

PLAN FOR SERVICES AND PLAN FOR AGRICULTURAL PRESERVATION

FAHMY ANNEXATION

Plan for Services

City of Waterford

INTRODUCTION

This Plan for Services has been prepared to provide background information in support of the proposed Fahmy Annexation (hereafter referred to as the Proposed Project) and to demonstrate the City of Waterford's ability to provide municipal services to the annexation area in a timely and efficient manner. The Plan for Services is intended to ensure compliance with the requirements of the Stanislaus County Local Agency Formation Commission (LAFCo) and other applicable regulatory standards.

This document has been prepared pursuant to California Government Code Section 56653, which requires that applications for a change of organization or reorganization be accompanied by a plan for providing services. The Plan for Services identifies existing and proposed service providers, describes service capabilities and infrastructure, and evaluates the City's ability to finance and extend municipal services to the Proposed Project.

The purpose of the Proposed Project is to allow the project to connect to City of Waterford municipal services and to establish an orderly and logical City boundary consistent with long-term planning objectives.

The Proposed Project is subject to review under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 et seq.), which provides LAFCo with authority over changes in local governmental boundaries. Pursuant to the criteria set forth in California Government Code Section 56337, the proposed annexation is supported by the following findings:

1. Lands within the annexation area are designated for urban uses under the City of Waterford General Plan.
2. The proposed annexation area is located within the City of Waterford's Primary Sphere of Influence.
3. The annexation proposes an orderly and logical boundary and is contiguous to the existing City limits.

4. The annexation represents a logical extension of the City's boundaries and can be served by existing and planned municipal infrastructure.

BACKGROUND

The Proposed Project is consistent with and implements the intent of the City of Waterford Vision 2025 General Plan. The Proposed Project and subsequent subdivision would facilitate new residential development in a manner that reflects thoughtful, orderly, and efficient planning within the City's planned growth framework. The Project site is located adjacent to existing City limits and would be served by municipal infrastructure and public services, thereby promoting logical boundary expansion and avoiding leapfrog development.

The Proposed Project supports the Vision 2025 General Plan's goals and policies related to managed growth, efficient service delivery, and the provision of housing opportunities within areas planned for urban development. By extending City services to the project site and incorporating the property into the City's land use and regulatory framework, the project ensures development occurs in a coordinated and fiscally responsible manner consistent with the City's long-term planning objectives.

The Land Use Plan of the City of Waterford's Vision 2025 General Plan identifies the Proposed Project as being located within the City's adopted Primary Sphere of Influence (SOI). The site is designated Low Density Residential (LD). Pursuant to the Vision 2025 General Plan, the Low Density Residential designation is intended to accommodate predominantly single-family detached residential development, while also allowing for a range of compatible single-family housing types. These may include alternative formats such as condominium units and zero lot-line residential development, consistent with applicable development standards and implementing zoning regulations.

Annexation and Pre-Zoning

The Project site is currently located within unincorporated Stanislaus County and lies within the City of Waterford's adopted SOI. The Proposed Project would incorporate six (6) existing legal parcels into the City of Waterford, identified by the following Assessor Parcel Numbers (APNs): 080-003-050, 080-003-012, 080-003-015, 080-003-034, 080-003-040, and 080-003-049.

The Project site is contiguous with the existing City limits along its eastern and southern boundaries, allowing for the logical extension of municipal boundaries and services. The site is generally bounded by North Reinway Avenue to the east, State Route 132 to the south, and the Modesto Irrigation District (MID) Main Canal and North Eucalyptus Avenue to the west.

The Project site is predominantly undeveloped and includes four (4) existing residences and an existing Mobile Home and RV Park (Space in the Shade Mobile Home), located at 11819 Yosemite Boulevard (APN 080-003-040). The Mobile Home and RV Park consists of forty-three (43) spaces,

the majority of which are currently occupied. The existing mobile home and RV park is assumed to remain in place and is included in overall service planning assumptions.

Upon approval of the annexation request, the Project site would be pre-zoned consistent with the City of Waterford's Vision 2025 General Plan land use designations. Based on applicable General Plan designations, the overall development capacity within the annexation area is estimated at approximately 207 single-family residential units, inclusive of the 43 existing mobile home/RV park units and the 98 single-family residential lots proposed as part of the subdivision. No additional development beyond the 98 lots is proposed at this time.

APN 080-003-050 is pre-zoned Planned Community (PC) to allow for flexibility in lot sizes below the minimum lot size required under the Residential Single (RS) zoning district. All other applicable development standards, including setbacks, lot coverage, and height, would conform to the RS zoning standards as implemented through the PC designation.

Tentative Subdivision Map and Infrastructure

The Proposed Project includes a Tentative Subdivision Map to subdivide approximately 19.2 acres of the annexation area into ninety-eight (98) single-family residential lots, along with one parcel reserved for a sanitary sewer pump station.

Sanitary sewer service would be provided through a pump station located within the subdivision. Wastewater would be conveyed via a six-inch force main extending approximately 2,470 feet south along North Reinway Avenue to an existing manhole at the intersection of South Reinway Avenue and Washington Road.

Storm drainage runoff would be conveyed through a gravity-fed system to a future storm drainage trunk main in North Eucalyptus Avenue. Stormwater would be discharged through a metering structure and overflow pipe to an existing twelve-inch storm drain line in North Reinway Avenue. Discharge flows would be metered to match pre-development runoff conditions, ensuring downstream drainage facilities are not adversely impacted. Any stagnant water within the storm drainage network would be addressed through underground percolation systems along North Eucalyptus Avenue, utilizing either dry wells or French drain systems, as appropriate.

Water service would be provided through a looped water system within the proposed internal roadways. An eight-inch water main would be installed along North Eucalyptus Avenue to serve the Project frontage and accommodate future extensions. The subdivision would connect to the existing municipal water system at two (2) points along North Reinway Avenue, including one connection at the project entrance and an additional connection via an easement across Lots 90 and 93. A water line would also be installed within the northern stub street to allow for future system connectivity.

Development Characteristics and Access

Physical development of individual residential units is not proposed at this time. Future development of the subdivided lots would be subject to separate discretionary approvals and would be required to comply with the City of Waterford Zoning Ordinance, including Section 17.20 (General Residential Districts), as well as all applicable municipal standards and regulations. Ultimately, land uses within the subdivision would be consistent with permitted uses in the Residential Single (RS) zoning district.

Typical lot sizes within the subdivision would be approximately 6,000 square feet. Primary vehicular access to the Project site would be provided from North Reinway Avenue, North Eucalyptus Avenue, and the proposed internal roadway identified as “Street A.”

WATER SUPPLY

The City will require any future applicant/developer to construct the water supply infrastructure necessary to serve the Proposed Project area and future development. Annexation of the subject area will be required, with any development, to connect to the City of Waterford Domestic Water System.

Water supply for the Proposed Project area would be provided by the City of Waterford, which is responsible for supplying all urban water demands within the City of Waterford, including the River Pointe subdivision and future development within the City’s SOI. The City’s water system is planned and operated to expand in a logical and orderly manner to serve growth areas identified in the General Plan and SOI.

Existing agricultural uses on the Project site are currently served by the Modesto Irrigation District (MID) through a main canal located along the southern boundary of the site and a private 30-inch concrete pipeline traversing the site from east to west. Upon annexation and urban development, water service would transition from agricultural surface water supplies to the City of Waterford’s municipal groundwater-based system.

Water System Ownership and Planning Framework

The City of Waterford relies exclusively on groundwater as its potable water source and does not currently utilize surface water for municipal supply. On July 1, 2015, the City negotiated and completed the acquisition of the Del Este Water System from the City of Modesto, thereby becoming the owner and operator of water utility services within the City of Waterford and the unincorporated community of Hickman.

To support long-term planning and system reliability, the City entered into a contract with Shoreline Engineering and Restoration in September 2015 to prepare a comprehensive Water Master Plan for the Waterford and Hickman water systems. The final draft of the Water Master

Plan was published in April 2016 and provides an evaluation of existing system conditions, identifies deficiencies, and outlines phased capital improvement strategies to accommodate future growth through a long-range planning horizon extending to approximately 2070.

The City also prepares and maintains an Urban Water Management Plan (UWMP), which evaluates current and projected water demands and identifies water supply strategies necessary to serve anticipated growth consistent with state water planning requirements.

Water Supply Capacity and Demand

The City of Waterford currently operates eight (8) active groundwater production wells, which serve as the primary source of potable water. Individual well capacities range from approximately 305 gallons per minute (gpm) to 800 gpm. The combined gross production capacity of these wells is approximately 4,425 gpm. In accordance with State Water Code requirements and operational constraints, the City's net well production capacity is approximately 3,625 gpm.

Based on data from the 2016 Water Master Plan, the City's total water supply and distribution capacity is estimated at approximately 4,020 gpm. Average annual water demand is approximately 1,413 acre-feet per year, equivalent to approximately 875 gpm. The City's maximum daily demand recorded in 2016 was approximately 1,662 gpm, which is representative of peak-day pumping conditions.

According to the City of Waterford Municipal Service Review (MSR) (July 2007), peak hour water demands for the former Del Este system, excluding the Grupe River Pointe development, were estimated at approximately 5.23 million gallons per day (mgd), equivalent to approximately 3,632 gpm. At peak hour demand conditions, the Waterford Water System operates near this demand level; however, system planning, operational management, and phased capital improvements are designed to ensure reliable service as demand increases over time.

The City has reviewed its current water supply capacity and distribution system and has determined that existing facilities, combined with planned improvements identified in the Water Master Plan, are sufficient to accommodate future residential growth within the SOI, including the Proposed Project.

Water System Improvements and Project Demand

The Proposed Project will connect to the City of Waterford's municipal water system and would be required to comply with all applicable City standards, water quality regulations, groundwater management requirements, and adopted master plans. The Project would pay all applicable water connection fees, development impact fees, and improvement costs, ensuring that it contributes its fair share toward system expansion and long-term reliability.

As water demand continues to increase citywide, the City will continue to implement the recommendations of the 2016 Water Master Plan, including infrastructure upgrades, system

looping, additional storage, and potential future well improvements, as necessary to maintain adequate service levels.

Service Adequacy and Conclusion

Based on the City's existing groundwater production capacity, current average and peak demand levels, adopted planning documents, and long-term capital improvement strategies, the City of Waterford has adequate water supply and distribution capacity to serve the Proposed Project area. The extension of water service would occur in an orderly and efficient manner consistent with the City's General Plan, Urban Water Management Plan, and Water Master Plan.

The Proposed Project would not result in the duplication of water services and would allow for the coordinated expansion of the municipal water system within the City's Sphere of Influence, consistent with the requirements of Government Code §56653 and the Cortese-Knox-Hertzberg Local Government Reorganization Act.

WASTEWATER COLLECTION AND TREATMENT

The Proposed Project currently has an existing wastewater facility within the immediate vicinity of the subdivision. The nearest connection point to the City of Waterford's domestic wastewater system is located within North Reinway Avenue. The Proposed Project will be served by the City's sewer infrastructure, with a parcel within the subdivision designated for a new sanitary sewer pump station (Lot A).

Wastewater from the subdivision will be conveyed via a new gravity sewer system within the proposed streets to the on-site pump station. From there, sewage will be pumped through a six-inch force main south along North Reinway Avenue for approximately 2,470 feet to an existing manhole at the intersection of South Reinway Avenue and Washington Road, connecting to the City's collection system. All wastewater improvements will be designed and constructed in accordance with the City's Vision 2025 General Plan Goals and Policies, the Waterford Municipal Code, and applicable wastewater treatment master plans.

Existing Wastewater System

Per the City's 2007 Municipal Service Review (MSR), the City of Waterford operates and maintains a wastewater collection, treatment, and disposal system with a total treatment capacity of 1.0 million gallons per day (mgd). The system consists of a network of gravity sewers, force mains, and lift stations, all of which convey wastewater to a single Wastewater Treatment Plant (WWTP) located just south of Riverside Drive on a bluff above the northern bank of the Tuolumne River.

The City's sewer system serves approximately 8,500 residents, encompassing residential, retail, office, commercial, and light industrial land uses. The wastewater collection system includes approximately 26 miles of nine (9) gravity sewer lines, 1.5 miles of force mains, roughly 200 manholes, and four (4) lift stations. Sewer mainlines are composed of various materials depending

on their age, including vitrified clay pipe (VCP) and polyvinyl chloride (PVC). The City's primary operational goal is to maintain uninterrupted sewage flow, avoiding health hazards, effluent leakage, or water infiltration and inflow.

The current average wastewater flow is approximately 0.585 mgd, which represents roughly 75 gallons per person per day. Projected build out of the current City limits is estimated to increase flows to 0.780 mgd, which remains within the treatment capacity of the WWTP. Sewer infrastructure is generally located within reasonable proximity to all vacant lands within City limits, with planned infrastructure expansions coordinated with new development. Recent sewer extensions, including from Yosemite Boulevard to Vineyard Road, further support capacity for anticipated growth.

The City currently has adequate wastewater treatment and collection capacity to accommodate build-out under the General Plan. The Proposed Project's wastewater demand is not expected to exceed existing system capacity and will integrate seamlessly with the City's existing collection and treatment infrastructure.

STORMWATER

The Proposed Project will implement a comprehensive stormwater management system designed to protect downstream infrastructure, maintain pre-development flow rates, and enhance water quality. An existing twelve-inch storm drainage manhole is located within North Reinway Avenue approximately 140-feet south of the subdivision boundary. Stormwater runoff from the subdivision will be conveyed via a new gravity system to the future storm drainage trunk main in North Eucalyptus Avenue. Stormwater will be discharged through a metering structure and overflow pipe into the existing twelve-inch storm drainage line in North Reinway Avenue, with discharge rates controlled to match pre-development conditions to prevent overloading downstream stormwater systems.

To manage infiltration and avoid stagnation, the stormwater system will incorporate an underground percolation network along North Eucalyptus Avenue, employing a series of four (4) Drywells or French Drain systems. This design ensures that water not conveyed to the municipal system can percolate into the subsurface, supporting groundwater recharge and reducing surface runoff.

The Proposed Project will also include Low-Impact Development (LID) design measures, consistent with current stormwater management best practices. These measures may include bioretention areas, vegetated swales, and other features that reduce runoff volume, improve water quality, and enhance site drainage.

A Stormwater Facility Operation and Maintenance Plan will be prepared for the Proposed Project, outlining procedures to ensure that all stormwater control measures are inspected, maintained, and adequately funded for the life of the project. All stormwater infrastructure and management

practices will comply with the City’s Vision 2025 General Plan Goals and Policies, the Waterford Municipal Code, and adopted storm drain, water, and wastewater master plans.

Through this design, the Proposed Project will ensure safe, effective, and sustainable stormwater management, minimizing the risk of flooding, protecting downstream systems, and supporting water quality improvements consistent with City standards.

FIRE PROTECTION SERVICES

Fire protection and emergency medical services for the Proposed Project would be provided by the Stanislaus Consolidated Fire Protection District (SCFPD), which currently serves the City of Waterford and surrounding unincorporated areas within its Sphere of Influence. SCFPD is a full-service, all-risk fire protection district that provides fire suppression, emergency medical response, rescue services, hazardous materials response, wildland fire suppression, water rescue operations, and fire prevention services.

Governance and Administrative Structure

SCFPD operates under the policy direction of a Board of Directors, which is responsible for governance oversight, adoption of budgets, establishment of service levels, and ensuring compliance with applicable state and local regulations. The District’s day-to-day operations are administered by the Fire Chief, who is responsible for overall leadership, strategic planning, emergency response readiness, personnel management, and coordination with local, regional, and state agencies.

The Fire Chief is supported by a Deputy Chief of Operations, who oversees field operations, emergency response coordination, and operational readiness across the District. Administrative functions, including finance, budgeting, payroll, and records management, are supported by a Finance and Administrative Manager and administrative support staff. This administrative structure provides the fiscal and organizational capacity necessary to maintain existing service levels and accommodate future growth within the District’s service area.

Operational Command and Staffing

SCFPD’s operational command structure is organized through a Battalion Chief system, which provides direct supervision of fire stations, emergency response units, and suppression personnel. Battalion Chiefs oversee shift operations, incident command, training compliance, and maintenance of adopted response standards throughout the District.

District-wide, SCFPD operates six (6) fire stations, consisting of five (5) fully staffed stations and one (1) unstaffed station, and employs approximately 56 full-time personnel and two (2) part-time personnel. SCFPD responds to more than 4,200 calls for service annually, including medical aids, structural fires, hazardous materials incidents, wildland fires, water rescues, and other emergency responses.

Station No. 24 – Waterford Service Area

Fire protection services to the Proposed Project would be provided primarily by SCFPD Station No. 24, located at 129 E Street in downtown Waterford, approximately 1.2 miles southeast of the Project site. Station No. 24 is a 7,600-square-foot facility, constructed in 2017, and is staffed 24 hours per day, seven days per week, with three full-time personnel per shift.

Station No. 24 houses the following apparatus and specialized resources:

- One (1) Type 1 Engine
- One (1) Type 3 Brush Rig
- One (1) Water Rescue Boat
- One (1) Office of Emergency Services (OES) Type 1 Engine

The station's water rescue boat provides specialized response coverage for Modesto Reservoir, Turlock Lake, and a substantial portion of the Tuolumne River, enhancing the District's regional emergency response capabilities.

Service Demand and Performance

SCFPD maintains a strong emergency response profile and has demonstrated the capacity to meet existing service demands. Historical call data indicates that in 2014, SCFPD Station No. 24 received 1,790 calls for service, of which 1,083 were EMS/rescue-related, 154 were fire related, and 301 were classified as good intent calls. During the same period, the District as a whole responded to 4,235 incidents, reflecting a broad range of emergency service activities across its service area.

Fire Protection Rating and Service Quality

The Insurance Services Office (ISO) currently rates the overall SCFPD service area as a Class 2 under the Public Protection Classification Program, on a scale of 1 to 10, with 1 representing the highest level of fire protection. The ISO rating evaluates factors such as emergency communications, staffing, apparatus deployment, training, response capability, and water supply for fire suppression. The District's ISO rating reflects a high level of fire protection service for both existing and future development.

Financing and Growth-Related Improvements

The City of Waterford and SCFPD coordinate to ensure that new development contributes its fair share toward facilities and services required to accommodate growth. Development Impact Fees, adopted pursuant to Government Code § 66000 et seq., serve as the primary funding mechanism for new or expanded fire protection facilities, equipment, and capital improvements necessitated by new development.

SCFPD recently updated its Development Impact Fees through preparation of a Facilities Impact Study (2024), which evaluates the District’s long-term facility and equipment needs to serve future growth within its service area. The District’s recently adopted impact fee is \$0.86 per square foot of new development. Impact fees collected from new development within the Proposed Project, along with ongoing revenues from property taxes and other District funding sources, would be used to support capital improvements and service expansion as needed.

In addition, SCFPD maintains a special assessment for fire protection services. As new parcels are created within the Proposed Project, each parcel would contribute to this assessment to finance the ongoing provision of fire protection and emergency response services.

Based on SCFPD’s established governance structure, operational command framework, station staffing, apparatus resources, response capabilities, and adopted financing mechanisms, the District has adequate organizational capacity and service capability to provide fire protection and emergency medical services to the Proposed Project. The Proposed Project would not result in duplication of services and would allow for the orderly, efficient, and fiscally sustainable extension of fire protection services consistent with the requirements of the Cortese-Knox-Hertzberg Local Government Reorganization Act and Government Code §56653.

POLICE PROTECTION SERVICES

Law enforcement services for the Proposed Project would be provided by Waterford Police Services, which operates under contract with the Stanislaus County Sheriff’s Department. The City of Waterford entered into a law enforcement services agreement with Stanislaus County in July 1998, at which time the former Waterford Police Department transitioned to Waterford Police Services. This contractual arrangement allows the City to provide comprehensive, professional police services while leveraging the personnel, resources, and specialized units of the Stanislaus County Sheriff’s Department.

Organization and Staffing

Waterford Police Services is staffed by both full-time and extra-help personnel from the Stanislaus County Sheriff’s Department. A total of eleven (11) sworn positions are assigned to serve the City of Waterford, including one Lieutenant, one Sergeant, and seven Deputy Sheriffs, along with two administrative positions that support law enforcement operations. The Lieutenant serves as the Chief of Police, currently Chief David Mullins, and is funded jointly, with 50 percent of the position funded by the City of Waterford.

The remaining sworn and administrative positions assigned to Waterford Police Services are fully funded by the City. This staffing model provides dedicated local law enforcement coverage while allowing access to Countywide law enforcement resources as needed.

Facilities and Service Area

Waterford Police Services operates from a police station located at 115 E Street, approximately 1.25 miles east of the Project site. From this location, officers provide patrol, traffic enforcement, investigations, and community-oriented policing services throughout the City of Waterford, including areas proposed for annexation.

Service Standards and Performance

The law enforcement services agreement between the City of Waterford and the Stanislaus County Sheriff specifies a minimum staffing standard of one sworn officer per 1,000 residents. As of July 2023, the City's estimated population was 9,323 residents, resulting in an officer to population ratio of approximately 1.18 sworn officers per 1,000 residents, which exceeds the minimum contractual standard.

Waterford Police Services responded to 4,433 calls for service in 2024, with an average response time of approximately 5 minutes, which is within the City's adopted General Plan response time goals. These performance metrics demonstrate the Department's ability to provide timely and effective law enforcement services to existing development within the City.

Specialized Law Enforcement Services

In addition to locally assigned personnel, Waterford Police Services has access to a wide range of specialized Sheriff's Department units operating out of the Sheriff's Operations Center on Hackett Road in Modesto. These specialized services include, but are not limited to, investigations related to felony assaults, crimes against children, fraud, narcotics enforcement, gang and street crimes, and other complex or resource-intensive law enforcement activities. This arrangement enhances the City's ability to respond to serious incidents without the need to maintain specialized units at the local level.

Funding and Growth-Related Impacts

The City's total budget for Waterford Police Services for Fiscal Year 2024/2025 is approximately \$2,525,494. Law enforcement operations are funded primarily through the City's General Fund, while capital improvements and facility needs are supported through Capital Facilities Fees (CFF) collected from new development.

Approved and pending development projects within the City, including the Proposed Project, are anticipated to generate additional demand for law enforcement services. The Proposed Project would be required to pay all applicable Capital Facilities Fees, including the portion allocated for police services. Payment of these fees is intended to offset or mitigate the incremental impacts of new development on law enforcement facilities and services and to ensure that service levels remain consistent with adopted standards.

Based on existing staffing levels, contractual service standards, response time performance, access to specialized County law enforcement resources, and established funding mechanisms, Waterford Police Services has adequate capacity to provide police protection services to the Proposed Project. Extension of police services to the annexation area would occur in an orderly and efficient manner, would not require construction of new police facilities at this time, and would be consistent with the requirements of Government Code §56653 and the policies of the Cortese-Knox-Hertzberg Local Government Reorganization Act.

FINANCING

The Proposed Project will be fully financed by the Project Proponent. All on-site and Project-specific infrastructure improvements will be funded through private financing and constructed at the Project Proponent's expense.

Public facilities and services associated with the Proposed Project would similarly be funded by the developer through the payment of all applicable City development impact fees, connection fees, and other required assessments in effect at the time of development, consistent with City policies and adopted fee programs. These fees are intended to offset the costs associated with the provision of public facilities and services necessitated by the Proposed Project.

Long-term operation and maintenance of public facilities serving the Proposed Project would be made possible through annexation into Community Facilities District (CFD) No. 2019-01. Ongoing maintenance costs would be funded through CFD assessments, in combination with applicable City enterprise funds and other municipal revenue sources, as appropriate. As a result, the Proposed Project is not anticipated to result in an undue fiscal burden on the City of Waterford or other service providers, as the Proposed Project will contribute proportionately to both the capital and long-term maintenance costs associated with public services and infrastructure.

Plan for Agricultural Preservation

The purpose of a Plan for Agricultural Preservation is to assist the LAFCo Commission in determining how the annexation of the Proposed Project meets the stated goals of LAFCo's Agricultural Preservation Policy.

This Plan for Agricultural Preservation includes:

1. A detailed analysis of direct and indirect impacts to agricultural resources on the site and surrounding area, including a detailed description of the agricultural resources affected and information regarding Williamson Act lands,
2. A discussion on existing and proposed densities,
3. A description of relevant County and City General Plan policies and specific plan,
4. A discussion on consistency with regional planning efforts,
5. An analysis of mitigation measures and strategies to minimize loss of agricultural lands,
6. A discussion on alternative lands located within the sphere of influence,

7. Possible growth or phasing of the development,
8. Minimization of use of agricultural land, and
9. Preparation for the planned, orderly, and efficient use of land.

Detailed Analysis of Direct and Indirect Impacts to Agricultural Resources on the Site and Surrounding Area

The Proposed Project contains approximately 29.18 acres of Prime Farmland that will be permanently converted for development the Proposed Project, including the Tentative Subdivision Map and the pre-zoning for residential use. Of the total 43.27 acres for the Project site, 19.2 acres will be subdivided to create ninety-eight (98) new single-family residential lots, permanently removing this portion from agricultural production.

The City's Vision 2025 General Plan Environmental Impact Report anticipated development of the Project area as part of the overall evaluation of the buildout of the City. While the City has incorporated all available mitigation for the loss of agriculture land in the form of General Plan policies and implementation strategies, the extent of urban development under the General Plan inherently involves the conversion of high-quality agricultural land.

The Proposed Project is bounded by agricultural lands to the north and west. Indirect impacts include potential conflicts between new residential uses and existing agricultural operations (e.g., noise, dust, and privacy).

Williamson Act Lands

There are no Williamson Act Contracts within the Proposed annexation area.

Existing and Proposed Densities

The Stanislaus County General Plan Land Use Element designates the proposed Annexation Area as Agriculture (A), and those lands are zoned by Stanislaus County as A-2-10. The density for A-2-10 is generally 0.10 dwelling units per acre. Currently, the Project site consists primarily of agricultural lands; however, a portion of the Project site consists of the existing Space in the Shade Mobile Home Park, which currently provides forty-three (43) mobile home and RV spaces for rent, and is located at the southern portion of the Project site immediately adjacent to Yosemite Boulevard.

Proposed Annexation and Proposed Densities

The Proposed Project includes a Tentative Subdivision Map that would permit the development of ninety-eight (98) residential units. The Proposed Project is designated as Low-Density Residential (LD) by the Waterford Vision 2025 General Plan. The LD designation allows for 4 to 6 dwelling units per gross acre. The subdivision of the 19.2-acre portion will result in an average density of

approximately five (5) dwelling units per acre. This is consistent with the City's Vision 2025 General Plan requirements.

Relevant Waterford Vision 2025 General Plan Policies

The Waterford Vision 2025 General Plan includes goals and policies that aim to sustain and preserve existing and future agricultural lands. The Waterford Vision 2025 General Plan states:

Policy UE-1: Promotes annexation of developed areas within the City's Sphere of Influence. The Proposed Project is located within Waterford's Sphere of Influence. The Project site is also partially developed with the Space in the Shade Mobile Home Park.

Policy UE-3: The City shall accommodate urban development on non-prime soils whenever feasible. This policy calls for the City to oppose development in the SOI that is not proposed for annexation into the City. The Proposed Project includes an annexation into the City of Waterford.

Policy UE-4: The City shall control the timing, density, and location of new land uses within its urban expansion boundaries to reflect the availability of urban and utility services. The Project site is located directly contiguous to the City's western boundary line. The Proposed Project includes an application for annexation, pre-zoning, and a tentative subdivision map.

Policy L-1.3: Encourage a diversity of lot sizes in residential subdivisions. The Proposed Project includes pre-zoning 20.08 acres as Planned Development. The PD zoning will allow the development of 5,500 square foot lot sizes, smaller than the 6,000 square feet required for the Low Density Residential District.

Policy PF-1.5: Assure that Expansion of the City Results in the Enhancement of Municipal Services and Facilities within Waterford Without Increasing Costs to the Existing City. It has been determined that the current water, sewer, and stormwater infrastructure can accommodate this Proposed annexation.

Policy OS-B-1: Protect agricultural areas outside the City's urban growth area from urban impacts. The Project Proponent has entered into a Memorandum of Understanding with the California Farmland Trust.

Policy OS-B-2: Relieve pressures on converting areas containing large concentrations "prime" agricultural soils to urban uses by providing adequate urban development land within the Waterford urban growth area. The Proposed Project is located within the City's Sphere of Influence.

Policy SD-4.1: Preserve the City's Prime agricultural soil resources. The Proposed Project is located within the City's Sphere of Influence.

Consistency with Regional Planning Efforts

The Proposed Project is consistent with the Waterford Vision 2025 General Plan and implements the General Plan goals, policies, and objectives.

In addition, the proposed project follows the guidelines of the San Joaquin Valley Regional Blueprint (Blueprint) and follows principles of smart growth that are reflected in the Waterford General Plan. The Blueprint promotes increases in development densities over time to accommodate a growth that is consistent with realities in both communities and the marketplace overall. In addition to this added growth across the region, the Blueprint recognizes that more compact development can be utilized as a more cost effective and sustainable approach to managing urban growth. Specifically, the Vision 2025 General Plan is consistent with the following Smart Growth Principles that the Blueprint is based upon: creating a range of housing opportunities and choices; creating walkable neighborhoods; fostering distinctive, attractive communities with a strong sense of place; containing a mix of land uses; strengthening and directing development towards existing communities; taking advantage of compact building design; enhancing the economic vitality of the region; and supporting actions that encourage environmental resource management.

The Project site is located within the City's Primary Sphere of Influence (SOI), which was approved by the Stanislaus Local Agency Formation Commission (LAFCo) in 2007. The Proposed Project meets applicable LAFCo policies necessary to support annexation.

Analysis of Mitigation Measures and Strategies Proposed to Minimize Loss of Agricultural Lands

Mitigation Measure Ag.-1 of the Fahmy Annexation IS/MND requires the following:

“Prior to the filing of an annexation request to the Stanislaus LAFCo, the Developer and/or Project Proponent shall provide to the City of Waterford Planning Department a Plan for Agricultural Preservation which shall include written evidence of compliance with Stanislaus LAFCo Policy 22.”

The Stanislaus LAFCo Policy 22 requires a Plan for Agricultural Preservation to be submitted that outlines the information included in this Plan. The Plan for Agricultural Preservation demonstrate how the Proposed Project meets the stated goals of LAFCO's Agricultural Preservation Policy.

Pursuant to Stanislaus LAFCo Policy 22, the City of Waterford is requiring a 1:1 mitigation for the loss of approximately 29.18 acres of Prime Farmland in the Project site. Of the 29.18 acres, 18.5 acres are located within the Proposed area of the Tentative Subdivision Map. In order to satisfy this mitigation requirement, the Project Applicant has entered into a Memorandum of Understanding (MOU) with the California Farmland Trust that requires the payment of in-lieu fees to the Trust on a per acre basis. Per the MOU, dated December 9, 2025 the Applicant will be required to pay \$15,034 per acre of the 18.5 acres of Prime Farmland within the Proposed area of the Tentative Subdivision Map. This mitigation fee will be applicable to the 10.68 acres of Prime Farmland located to the south of the Proposed subdivision in the Project area.

The Proposed Project implements the General Plan Policy UE-1 by prioritizing annexation within the existing Primary Sphere of Influence rather than expanding beyond planned growth boundaries.

Alternative Land within the Sphere of Influence

In 2007, the Lake Pointe Master Development Plan (MDP) was approved and annexed into the City of Waterford. Lake Pointe is 425-acres in size and is located along the City's northeast boundary. The Lake Pointe MDP has remained undeveloped since its annexation. However, the City has received and is currently processing a Tentative Subdivision Map application for 412 single-family lots on three (3) parcels totaling 73.6 acres. The Proposed Project in the Lake Pointe MDP would be developed in two (2) phases.

Several infrastructure improvements are required in order for the Lake Pointe MDP to be built out. According to the Lake Pointe Development Environment Review, dated September 2007, the MDP area would require new stormwater facilities, develop groundwater resources, construct a new storm drain system, and upgrade the City's wastewater treatment and disposal system. Because of this, the development of the MDP would entail a more complicated development process compared to the Proposed Project. The Proposed Project will connect to the existing utilities on N. Reinway Avenue. These new utility connections have been reviewed and it has been determined that the current water, sewer, and stormwater infrastructure can accommodate this Proposed Project. As previously discussed, the Proposed Project includes a Tentative Subdivision Map for ninety-eight (98) residential lots, which will be developed in one (1) phase. At this point, the development of the Proposed Project is more immediately than other available land within the City limits and SOI. The Proposed Project is located contiguous to the western city limits and provides additional housing development opportunities for the western side of Waterford.

Probable Growth/Phasing of Development

The Proposed Project includes a Vesting Tentative Subdivision Map (VTSM) to subdivide 19.21 acres of the total 43.27 acres into ninety-eight (98) residential lots and is anticipated to be developed in one (1) phase. As previously stated, the Proposed Project includes the developed Space in the Shade Mobile Home Park, which currently provides forty-three (43) mobile home and RV spaces for rent.

The remainder of the Project site (approximately 24 acres) will remain in its existing condition for the time being. The annexation allows these remaining properties to ultimately connect to City services as they are developed, but they will be required to apply for and obtain separate approval from the City for any future development.

Minimization of Use of Agricultural Land

The Proposed Project is entitled with a Prezone Application. The Proposed Project has been prezoned with the RS, Residential Single and PC, Planned Community designations. The use of PC,

Planned Community zoning district allows for smaller minimum lot sizes (5,500 sq. ft. vs 6,000 sq. ft.) and higher lot coverage (60% vs 40%). This zoning district allows for more efficient use of the specific parcels being removed from agriculture, maximizing the use of the converted land.

Planned, Orderly, and Efficient Use of Land

The Proposed Project is located within Waterford's SOI, is contiguous to the city limit, and implements the General Plan. The Proposed Project includes the installation of essential frontage improvements (curb, gutter, sidewalk) and roadway improvements to Eucalyptus Avenue and N. Reinway Avenue.

The City Engineer determined there is sufficient water, sewer, and stormwater capacity to serve the subdivision and the remainder of the site.

The Proposed Project will annex into the City's Community Facilities District (CFD) No. 2019-01 to fund long-term maintenance of public facilities, ensuring the development pays for its own service impacts.

Improvements to Eucalyptus Avenue are designed to relieve traffic volumes on N. Reinway Avenue, ensuring the transportation network can handle the transition from agriculture to residential use.