

Appendix A

Initial Study and Notice of Preparation Comments



NOTICE OF PREPARATION AND INITIAL STUDY

FOR THE

CROSSROADS WEST SPECIFIC PLAN

MARCH 2017

Prepared for:

City of Riverbank, Development Services Department
6707 3rd Street
Riverbank, CA 95367
(209) 863-7128

Prepared by:

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D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



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INITIAL STUDY CHECKLIST

PROJECT TITLE

Crossroads West Specific Plan Project

LEAD AGENCY NAME AND ADDRESS

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PURPOSE OF THE INITIAL STUDY

An Initial Study is a preliminary analysis which is prepared to determine the relative environmental impacts associated with a proposed project. It is designed as a measuring mechanism to determine if a project will have a significant adverse effect on the environment, thereby triggering the need to prepare an Environmental Impact Report (EIR). This Initial Study has been prepared consistent with the California Environmental Quality Act (CEQA) Guidelines Section 15063, to determine if the proposed Project may have a significant effect upon the environment.

PROJECT LOCATION AND SETTING

PROJECT LOCATION

The Crossroads West Specific Plan (CWSP) area (also-known-as “Project site” or “Plan Area”) is located within the unincorporated area of Stanislaus County. The approximately 390-acre Plan Area is adjacent to the City of Riverbank (City) limits to the north and east. The Plan Area is contained within the City’s existing Sphere of Influence (SOI), and the Plan Area was previously analyzed at a programmatic level in the City’s 2005-2025 General Plan Update Environmental Impact Report.

The Plan Area is bounded on the east by Oakdale Road, on the south by Claribel Road, on the north by the Modesto Irrigation District (MID) Main Canal and the City of Riverbank city limits, and on the west by those property lines approximately 0.5-mile west of Oakdale Road. The Plan Area is located within Section 34 of Township 2 South, Range 9 East Mount Diablo Meridian (MDBM). The Plan Area is within the Riverbank, California, 7.5-minute series quadrangle map. Figures 1 and 2 show the Project’s regional location and vicinity.

The Plan Area is made up of nine assessor parcels. The Plan Area Assessor Parcel Numbers (APNs) and associated acreages are listed in Table 1, and are displayed on Figure 3. It is noted that the acreages below do not include the roadway right of way or the main canal and lateral which pass through the Plan Area from the east to the west.

Table 1: Parcels Within the Plan Area

<i>APN</i>	<i>ACREAGE</i>
074-006-016	60.51
074-006-022	8.92
074-006-021	0.38
074-006-014	11.00
074-006-013	4.76
074-011-004	0.98
074-011-009	153.96
074-014-006	86.29
074-014-007	54.04
Total	380.84

SITE TOPOGRAPHY

The Plan Area is relatively flat with natural gentle slope from northeast to southwest. The Plan Area topography ranges in elevation from approximately 111 to 125 feet above mean sea level. Figure 4 shows the U.S. Geological Survey (USGS) Topographic Map of the Plan Area.

EXISTING SITE USES

The nine parcels that comprise the Plan Area are primarily used for agricultural operations including dairy operations, row crops, and fallow land. Seven home sites exist within the Plan Area and many of them have accessory structures on site including storage buildings, shop buildings, and barn structures. Additionally, an approximately 11-acre regional City park, the Riverbank Sports Complex, is currently developed in the northeastern portion of the Plan Area,

near the intersection of Morrill Road and Oakdale Road. Crawford Road and Morrill Road traverse the Plan Area from east to west.

MID provides water supply for the existing agricultural uses and maintains two easements in the Plan Area. An MID main canal with a crossing is located along the northern boundary of the Plan Area. Residential development is located just north of the Plan Area. Additionally, MID Lateral 6 traverses the southern portion of the Plan Area from northeast to southwest. A series of private irrigation ditches distribute the MID water from the on-site canals throughout the Plan Area. Figure 5 shows aerial imagery of the current existing site uses within the Plan Area.

EXISTING SURROUNDING USES

Uses immediately adjacent to the southeast, south, southwest, and west of the Plan Area include agricultural uses and residential uses, including ranchettes and large estates lots. Other existing uses east of the southerly portion of the Plan Area include a single family residential subdivision and a commercial center. Existing residential subdivisions also exist to the north, northeast, and east of the Plan Area. Other nearby uses include a commercial shopping center located east of the Plan Area at the northeastern intersection of Claribel Road and Oakdale Road.

GENERAL PLAN LAND USE DESIGNATIONS

The Plan Area is currently located within Stanislaus County and is outside the Riverbank city limits, but within the City's SOI.

EXISTING CITY OF RIVERBANK GENERAL PLAN LAND USE DESIGNATIONS

The City of Riverbank General Plan designates the Plan Area as Lower Density Residential (LDR 0.0 to 8.0 dwelling units per acre [du/ac]), Medium Density Residential (MDR 8.0 to 16.0 du/ac), Higher Density Residential (HDR 16.0 or more du/ac), Mixed Use (MU), Civic (C), Community Commercial (CC), and Park (P). Table 2 shows the City land use designations and acreages for the Plan Area.

Table 2: City Land Use Designations Within Plan Area

<i>LAND USE</i>	<i>ACREAGE</i>
Lower Density Residential (LDR)	111.92
Medium Density Residential (MDR)	119.91
Higher Density Residential (HDR)	10.50
Mixed Use (MU)	6.18
Civic (C)	33.61
Community Commercial (CC)	54.04
Park (P)	44.70
Total	380.84

Figure 6a depicts the City of Riverbank General Plan land use designations for the Plan Area and the surrounding areas. The General Plan contains the following standards to guide development for these land uses:

Lower Density Residential (LDR): The LDR land use designation includes single-family homes, one to each lot, developed at a net density of up to eight dwelling units per acre. Lots

would be at least 5,000 square feet in size. This category would primarily include detached units, but attached single-family units may be permitted, provided each unit has ground-floor living area and private outdoor open space.

Medium Density Residential (MDR): The MDR land use designation includes small-lot, single-family detached homes, attached single-family homes, and other residences developed at a net density of between eight and 16 dwelling units per acre. Lots would be at least 2,500 square feet in size.

Higher Density Residential (HDR): The HDR land use designation allows for all types of attached single-family and multi-family housing, including condominiums, apartment buildings, townhouses, and other similar residential structures developed at a net density of 16 or more dwelling units per acre.

Mixed Use (MU): The MU land use designation would accommodate neighborhood-scale retail uses, offices, personal and commercial services, and similar land uses. This is the primary category for Riverbank to accommodate neighborhood-serving retail, services, offices, and similar needs during the buildout of this General Plan. As such, this land use classification is anticipated to be mainly non-residential. However, the MU designation also explicitly allows for higher-density residential development in a vertical or horizontal mixed-use setting. This could include residential development above (on upper stories of a building) or adjacent to commercial operations on the same property.

Civic (C): The C land use designation includes civic and cultural land uses of various types. Examples include schools, places of worship, public facilities and infrastructure, community halls, and similar cultural and civic land uses. Where such land uses occur within an existing or planned neighborhood, they shall be designed to be compatible with the surrounding neighborhood. They shall be designed to be pedestrian friendly, include publicly accessible areas (where appropriate), and shall unify rather than divide neighborhoods. Certain land uses included in this category, such as day care centers, public facilities and services, place of religious worship, and other appropriate land uses will be allowed in other land use designations, as well, according to standards established in Riverbank's zoning ordinance.

Community Commercial (CC): The CC land use designation is anticipated to be developed for retail, employment, and/or commercial services. These areas are located along major roadways on the periphery of existing and planned neighborhoods. The maximum floor-area-ratio (FAR) is 0.3.

Park (P): The P land use designation includes active and passive parkland of all types. New and existing neighborhoods in Riverbank shall have close and convenient access to community parks, neighborhood parks, and smaller "pocket parks." This category can include public plazas, town squares, tot lots, parkways, linear parks, and other park space configurations.

EXISTING STANISLAUS COUNTY GENERAL PLAN LAND USE DESIGNATIONS

The Stanislaus County General Plan designates the Plan Area as Agriculture (AG). Figure 6b depicts the Stanislaus County General Plan land use designations for the Plan Area and the surrounding areas. The General Plan contains the following standards to guide development for this land use:

Agriculture (AG): The AG land use designation recognizes the value and importance of agriculture by acting to preclude incompatible urban development within agricultural areas. The designation is intended for areas of land which are presently or potentially desirable for agricultural usage. These are typically areas which possess characteristics with respect to location, topography, parcel size, soil classification, water availability and adjacent usage which, in proper combination, provide a favorable agricultural environment. This designation establishes agriculture as the primary use in land so designated, but allows dwelling units, limited agriculturally related commercial services, agriculturally related light industrial uses, and other uses which by their unique nature are not compatible with urban uses, provided they do not conflict with the primary use.

EXISTING STANISLAUS COUNTY ZONING DESIGNATIONS

The Stanislaus County Zoning Ordinance currently designates the Plan Area for General Agriculture 40 Acre (A-2-40) uses. The County General zoning designations for the Plan Area and surrounding area are shown on Figure 6c. The County Zoning Code contains the following standards to guide development for this designation:

General Agriculture 40 Acre (A-2-40): The A-2-40 zone supports and enhances agriculture as the predominant land use in the unincorporated areas of the County. These district regulations are also intended to protect open-space lands pursuant to Government Code Section 65910.

SURROUNDING GENERAL PLAN DESIGNATIONS

Lands to the north, northwest, and west of the Plan Area (within the County) consist of AG uses, and lands to the south, southwest, and southeast (within the County) are designated Urban Transition (UT).

Lands to the north of the Plan Area (within the City of Riverbank) are designated for LDR, CC, and MU uses. Lands to the east of the Plan Area (within the City of Riverbank) are part of the original Crossroads Specific Plan and are designated for LDR, CC, MU, and P uses. Areas surrounding the Plan Area to the west (within the City's SOI) have City designations of LDR, MDR, HDR, P, C, and Buffer/Greenway/Open Space (B/G/OS). The City of Riverbank and Stanislaus County General Plan land use designations for the Plan Area and surrounding areas are shown on Figures 6a and 6b, respectively.

PROJECT DESCRIPTION

PROJECT OBJECTIVES

Consistent with CEQA Guidelines Section 15124(b), a clear statement of objectives and the underlying purpose of the proposed Project shall be discussed. The principal objective of the

proposed Project is the approval and subsequent implementation of the CWSP Project (the proposed Project). The quantifiable objectives of the proposed Project include annexation of 387.5 acres of land into the Riverbank City limits, and the subsequent development of land, which will include: Low Density Residential, Medium Density Residential, High Density Residential, Regional Sports Park, Mixed Use, Elementary School, Park/Basin, Neighborhood Park, and transportation and utility improvements.

The CWSP Project identifies the following objectives:

- Create opportunities for housing types responsive to current market conditions, with the flexibility to adapt to changing market conditions.
- Create synergy between this new Specific Plan Area, containing a mixture of urban uses, with Riverbank's existing commercial node at Crossroads Shopping Center east of Oakdale Road across from the Project site.
- Develop the next logical planning area adjacent (to the west and northwest) of the City's major existing commercial node at Crossroads Shopping Center.
- Provide housing opportunities for employees expected in Riverbank through the re-use and development of the Riverbank Industrial Complex.
- Provide opportunities for Riverbank residents to buy new homes in a newly created neighborhood.
- Eliminate the planning peninsula created by the city limits in northwest Riverbank by "squaring off" the city limits to the westernmost city limits at Patterson Road and the MID Main Canal.
- Develop areas adjacent to the city limits so there is no leap-frog development that, for a residential and commercial project, has the fewest landowners with large parcels that improves the likelihood that the objectives of a specific plan can be achieved over time.
- Promote a balance of uses in the Plan including retail opportunities, schools, public facilities, parks and open space and varying density residential.
- Promote a mix of urban uses that are linked to regional amenities and transportation systems.
- Provide a variety of sidewalks and walkways throughout the Plan Area to promote connectivity, foster a sense of community and connect the residents of Riverbank to amenities and public facilities.
- Protect adjacent farmland operations by providing transitional buffers.
- Encourage energy efficiency and thoughtful use of resources through sustainable design practices and Low-Impact Design (LID) strategies.
- Promote friendly and inviting streetscapes through the use of landscape materials, street fixtures, furniture and design elements that reflect a high-quality development.
- Encourage the use of mixed architectural styles and materials.
- Reinforce existing retail uses to the east and designate sufficient retail, office and commercial land for job generating uses to improve the City's jobs-to-housing balance.
- Create a safe and accessible link between neighborhoods, community facilities and shopping centers within the plan area and to the surrounding neighborhoods.

PROJECT CHARACTERISTICS

The proposed Project includes development of up to 1,872 Low Density Residential (LDR) units, up to 192 Medium Density Residential (MDR) units, and up to 388 High Density Residential (HDR) units. The Project also includes up to 550,000 square feet (sf) of Mixed Use 1 (MU-1) uses, and up to 27,000 sf of Mixed Use 2 (MU-2) uses. It is noted that development in MU-1 could consist of a maximum of 550,000 sf of retail uses and no residential uses, or up to 350 units of residential uses and 360,000 sf of retail uses. The CWSP is designed to provide flexibility, so there are various other hypothetical combinations of retail and residential development, but not more than the maximum density presented would be allowed without an amendment approved by the City. Additionally, the proposed Project would increase the size of the existing 11-acre Regional Park, the Riverbank Sports Complex, to 22 acres. A 10 to 12-acre elementary school is also proposed within the Plan Area. The proposed Project would provide approximately 42 acres of park, open space, and Regional Sports Park uses. See Figure 8 for the conceptual land use plan.

The CWSP land use plan proposes three categories of residential land uses: LDR, Low Density Residential; MDR, Medium Density Residential; and HDR, High Density Residential. These residential designations provide varying densities that will ensure a mix of housing types and styles across the Plan Area. All future development within the residential land use categories will be subject to Design Review Approval to ensure consistency with the Design Guidelines and Development Standards set forth in the Crossroads West Specific Plan. The Conceptual Land Use Plan in Figure 8 identifies locations for such land uses. It is expected that within the LDR areas, a ten- to twelve-acre elementary school site will be provided as well as a one acre fire station site near the corner of Crawford and Oakdale Road.

The land use plan as proposed would permit residential development of between 1,539 to 2,852 residential units. For LDR, the CWSP assumes between 1,170 and 1,872 units on 234 acres, assuming a buildout at between 5 and 8 du/ac, after removing parks, schools, and collector and arterial road rights-of-way. For MDR, the CWSP assumes between 96 and 192 units on 12 acres, based upon a buildout of between 8 and 16 du/ac. Some MDR density development would be allowed in the LDR areas, although they would need to fall within the total LDR number unit range. For HDR, the CWSP assumes between 248 and 388 units on 15.5 acres, based upon a buildout at between 16 to 25 du/ac. It is noted that the CWSP is designed to provide maximum flexibility for design and response to market demands, so there are various other hypothetical combinations of residential development, but no more units than the maximum allowed would occur without an amendment approved by the City.

Additionally, the proposed mixed-use areas (MU-1 and MU-2) provide opportunities for retail development, office/commercial development, as well as some residential uses. As noted above, the MU-1 property could provide up to 550,000 sf of retail, but could similarly provide about 360,000 sf of retail and up to 350 MDR or HDR units. The MU-2 property is estimated to develop with up to 27,000 sf of retail, and approximately 25 to 50 MDR or HDR units. Overall, the CWSP proposes between 1,539 and 2,852 residential units, and between 387,000 sf and 577,000 sf of mixed uses.

Table 3 provides a summary of the land uses proposed for the CWSP.

Table 3: Land Use Summary

<i>MAP SYMBOL</i>	<i>ACREAGE</i>	<i>DENSITY RANGE</i>	<i>UNIT OR SF RANGE</i>
LDR – Low Density Residential	234	5 – 8 du/ac	1,170 – 1,872 du
MDR – Medium Density Residential	12	8 – 16 du/ac	96 – 192 du/ac
HDR – High Density Residential	15.5	16 – 25+ du/ac	248 – 388 du
MU-1 – Mixed Use 1	54	0 – 12 du/ac 0.25 FAR	0 – 350 du 360,000 – 550,000 sf
MU-2 – Mixed Use 2	5	10 – 20 du/ac 0.25 FAR	25 – 50 du 27,000 sf
P – Parks/Open Space/Regional Sports Park	42	N/A	N/A
S – Elementary School	12	N/A	N/A
Right of Way and MID Facilities	15.5	N/A	N/A
TOTAL	390.0	--	1,539 – 2,852 du 387,000 – 577,000 sf

NOTES: SF = SQUARE FEET; DU/AC = DWELLING UNITS PER ACRE; FAR = FLOOR-AREA-RATIO; N/A = NOT APPLICABLE.

The proposed Project includes Design Guidelines and Development Standards and would provide flexibility various housing and lot sizes. The proposed Design Guidelines shall apply to all residential and non-residential projects that are subject to Site Plan Approval. In any instance where there is a conflict between the Development Standards, Design Guidelines and City Zoning Ordinance, the Development Standards and Design Guidelines from the CWSP supersede and govern development within the Plan Area.

Proposed Land Uses

This section provides an in-depth look at the land use categories that make up the CWSP. These land use classifications are consistent with the underlying General Plan land use designations. Their location within the Plan Area, any special concerns or planning issues, and policies for their development are provided. Development Standards and Allowable Land Uses, Conditional Uses, and Design Guidelines have been prepared for each category and are provided herein.

Low Density Residential (LDR)

The LDR designation is intended to provide detached, single-family dwellings on a variety of lot sizes and neighborhood configurations. Lot sizes will vary, and are expected to range in size from about 4,000 square feet to 6,000 square feet. The CWSP also allows that up to 25% of an acre designated LDR may be developed at MDR densities.

The maximum number of units allowed on parcels designated LDR is 8 du/ac. The density range provides some flexibility and will accommodate 5 to 8 dwelling units per gross acre in the LDR designation, after deducting arterial and collector road right-of-way and any public facilities, like schools or parks. Average development density is calculated at 6.5 du/ac. The density range is provided to allow for a mix of lot sizes on different parcels throughout the Plan Area.

As shown on Figure 8, each of the LDR development areas, LDR-1, LDR-2, LDR-3 and LDR-4, will be required to provide a minimum development density of five du/ac, and can provide up to

25% of the area at MDR densities of eight to sixteen du/ac, so long as the entire area does not exceed 8 du/ac over the entire area.

The allowable land uses within the LDR areas of the Project conform to the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.031, R-1 Single-Family Residential District Permitted Uses. In addition, up to 25% of the area may be developed to MDR and if this is proposed, any MDR area will need to comply with the MDR standards contained in Table 5 of this document. Other uses may be permitted in the LDR land designation, subject to securing a Conditional Use Permit through the City of Riverbank Planning Department. Such uses are listed in the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.032, R-1 Single-Family Residential District Uses Permitted with a Use Permit.

In addition to the Design Guidelines proposed by the CWSP, Development Standards within the LDR Land Use shall be as follows:

- *Front yard and side yard of a corner lot* - not less than ten feet from the planned right-of-way line provided that no vehicle opening of any building is closer than 20 feet to the property line or planned right-of-way line toward which the opening faces. Corner lot driveways shall not be located on the half of the lot frontage nearest the radius return, or be closer than 20 feet to said radius return.
- *Side or rear yard when lot abuts an arterial* - ten feet.
- *Rear yard* – ten feet.
- *Side yard, interior lots all other cases* - five feet.
- *Detached accessory buildings* - six feet from any other buildings. Any proposed detached accessory building shall comply with Senate Bill (SB) 1069 and Assembly Bill (AB) 2299.

See Table 4 for lot specifications and Development Standards for the LDR designation.

Table 4: Low Density Residential Standards – 4,000 – 6,000 sf Lots

	STANDARD
<i>LOT SIZE (MINIMUM)</i>	
Area, Interior Lot	4,000 sf
Area, Corner Lot	6,000 sf
Width, Interior	40'
Width, Corner	50'
<i>DENSITY RANGE AND AVERAGE MINIMUM DENSITY</i>	
Allowable Density Range	1 – 8 du/ac
Average Density	6.0 du/ac
<i>SETBACKS (MINIMUM)</i>	
Front Yard	--
Living Space (First/Second Story)	10'
Porch	7'
Garage (Front/Side Entry)	20'/15'
Side Yard	--
Living Space (Interior)	5' one side of 10' (zero lot line)
Living Space (Corner)	10'
Wrap Around Porch (Corner)	5'
Detached Garage / Accessory Unit	5'

	<i>STANDARD</i>
Rear Yard	--
Living Space	10'
Front Entry Attached / Detached Garage (Accessory Unit)	10'
Garages with Rear Access	5'
Patio Covers	7' (maximum)
<i>COVERAGE (MAXIMUM)</i>	
Site Coverage	50 - 55%
Landscape Area Coverage	30%
<i>HEIGHT (MAXIMUM TO RIDGE)</i>	
Height Limit	30' (2 stories)

NOTES: SF = SQUARE FEET; DU/AC = DWELLING UNITS PER ACRE.

Medium Density Residential (MDR)

The MDR designation is intended to provide areas with smaller lot sizes for both attached and detached housing including but not limited to cluster homes, courtyard homes and townhomes. To promote a mix of lot sizes and product types, the lot sizes are expected to range from about 2,500 square feet to 4,500 square feet.

The maximum number of units allowed on parcels designated MDR is 16 dwelling units per acre. Flexibility is provided in this designation by allowing a range of densities from 8 to 16 du/ac with the average density at 12 dwelling units per acre. The density range is provided to allow for a mix of lot sizes and housing product types on different parcels throughout the Plan Area.

The allowable land uses within the MDR areas of the Plan conform to the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.046, R-2 Duplex Residential District Permitted Uses. Other uses may be permitted in the MDR land designation, subject to securing a Conditional Use Permit through the City of Riverbank Planning Department. Such uses are listed in the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.047, R-2 Duplex Residential District Uses Permitted with a Use Permit.

Where there is a conflict between the Development Standards, Design Guidelines and City Zoning Ordinance, the Development Standards and Design Guidelines from the CWSP supersede and govern development within the Plan Area. See Table 5 for lot specifications and Development Standards for the MDR designation.

Table 5: Medium Density Residential Standards – 2,500 – 4,500 sf Lots

	<i>STANDARD</i>
<i>LOT SIZE (MINIMUM)</i>	
Area, Interior Lot	2,500 sf
Area, Corner Lot	2,500 sf (minimum)
Width, Interior	25' (minimum)
Width, Corner	30'
<i>DENSITY RANGE AND ALLOWABLE RESIDENTIAL UNITS PER LOT</i>	
Overall Residential Density Range	8 - 16 du/ac
Average Density	1 primary du, no secondary du allowed

	STANDARD
<i>SETBACKS (MINIMUM)</i>	
Front Yard	--
Living Space (First/Second Story)	10'
Porch	5'
Garage (Front/Side Entry)	N/A
Side Yard	--
Living Space (Interior)	3' one side or 6' (zero lot line)
Living Space (Corner)	10'
Wrap Around Porch (Corner)	5'
Detached Garage / Accessory Unit	N/A
Rear Yard	--
Living Space	10'
Front Entry Attached / Detached Garage (Accessory Unit)	N/A
Garages with Rear Access	4'
Patio Covers	N/A
<i>COVERAGE (MAXIMUM)</i>	
Site Coverage	60 – 65%
<i>HEIGHT (MAXIMUM TO RIDGE)</i>	
Height Limit	40' (3 stories)
<i>PRIVATE OPEN SPACE (PER UNIT)</i>	
Minimum Area Dimension	300 sf / 15'
<i>COMMON OPEN SPACE (PER UNIT)</i>	
Minimum Area	300 sf

NOTES: SF = SQUARE FEET; DU/AC = DWELLING UNITS PER ACRE; N/A = NOT APPLICABLE.

High Density Residential (HDR)

The purpose of the HDR land use designation is to provide attached, higher density residential options to residents. The maximum density allowed within the HDR designation is 25 du/ac. This will be achieved through the approval and construction of multi-story buildings containing condominiums and apartment homes. Flexibility is allowed in terms of density in the HDR designation with a range of 16 to 25 du/ac.

FAR standards for the HDR designation:

- For single story buildings - 0.60
- For two story buildings - 0.80
- For three story buildings - 1.20

The allowable land uses within the HDR areas of the Plan conform to the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.061, R-3 Multiple-Family Residential District Permitted Uses. Other uses may be permitted in the HDR land designation, subject to securing a Conditional Use Permit through the City of Riverbank Planning Department. Such uses are listed in the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.062, R-3 Multiple Family Residential District Uses Permitted with a Use Permit.

In addition to the Design Guidelines proposed by the CWSP, Development Standards within the HDR Land Use shall be as follows:

- For dwellings and other main buildings - three stories but in no case to exceed 45 feet.
- For accessory buildings - 15 feet.
- For one and two family dwellings or non-dwelling main buildings - 6,000 square feet.
- For each unit in excess of two dwelling units - 2,000 square feet, not to exceed 20 units per net acre.
- Front yard and side yard of a corner lot - not less than 15 feet from the planned right-of-way line, provided that no vehicle opening of any building is closer than 20 feet to the property line or planned right-of-way line toward which the opening faces.
- Rear yard when lot backs up to an arterial - ten feet.
- Side or rear yard, interior lots, all other cases - five feet.
- Detached accessory buildings - ten feet from any other buildings.

In any instance where there is a conflict between the Development Standards and Design Guidelines or other City document, the Development Standards and Design Guidelines from the CWSP supersede and govern development within the Plan Area. See Table 6 for lot specifications and Development Standards for the HDR designation.

Table 6: High Density Residential Standards – Multi-Family/Apartments

	STANDARD
<i>FAR STANDARDS</i>	
Single-story building	0.60
Two-story building	0.80
Three-story building	1.20
<i>PERMITTED DENSITY (PER HDR LAND USE AREA AND INDIVIDUAL LOT)</i>	
Density Range	16 – 25 du/ac
Maximum Density	25 du/ac
Average Density	18 du/ac
<i>SETBACKS (MINIMUM)</i>	
Front Yard	--
Living Space (First/Second Story)	15'
Porch	10'
Garage (Front/Side Entry)	N/A
Side Yard	--
Living Space (Interior)	5'
Living Space (Corner)	10'
Rear Yard	--
Living Space	N/A
Front Entry Attached / Detached Garage (Accessory Unit)	N/A
Distance Between Buildings	20'
<i>RESIDENTIAL BUILDING SIZE AND MIX</i>	
Apartment or stacked flat units are to be in building unit modules of 8 – 12 units	

		STANDARD
<i>PRIVATE / PUBLIC OPEN SPACE (MINIMUM)</i>		
Private		100 sf per individual ground level unit 70 sf balconies for upper level units
Public (Common)		400 sf per unit
<i>COVERAGE</i>		
Site Coverage / Landscape Coverage		N/A
<i>HEIGHT (MAXIMUM)</i>		
Height Limit		45' (3 stories)
<i>PROJECTIONS</i>		
Building elements such as chimneys, bay windows, roof overhangs, and other projections may extend no greater than 24" into a front or side yard setback. Roof overhangs on porches may extend no greater than 24" beyond face of porch columns.		

NOTES: SF = SQUARE FEET; DU/AC = DWELLING UNITS PER ACRE; FAR = FLOOR-AREA-RATIO; N/A = NOT APPLICABLE.

Mixed Use 1 (MU-1)

The MU-1 component of the Project is intended to be developed as mainly retail uses. As permitted by the General Plan, some residential uses may be integrated into the MU-1 areas, but these would be secondary to the overall purpose of the area as providing an area for mixed use development.

The maximum floor area ratio (FAR) in the MU-1 area is 0.30. It is projected that the overall FAR for the entire 58 acres would be about 0.25. Any residential units within the MU-1 area could be provided through vertical integration, above retail or other MU-1 uses, or through horizontal integration in small development areas at low, medium, or high density intensities. While some residential may be incorporated into the area, a minimum of 39 acres of the site shall be used for retail commercial uses.

The allowable land use within the community MU-1 areas of the CWSP conforms to the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.092, and C2 General Community Commercial District Permitted Uses. Certain land use may be permitted upon securing a Conditional Use Permit (CUP) through the City of Riverbank Planning Department. Such uses are listed in City of Riverbank Land Usage Code, Title XV, Chapter 153-Zoning, Section 153.093, C-2 General Commercial District, Uses Permitted with a Use Permit, Mixed Use 1.

In addition to the design guidelines proposed by the CWSP, Development Standards within the MU-1 land use shall be those identified in City of Riverbank Land Usage Code Title XV, General Regulations starting at Section 153.180 which govern height limits, building site area, yards, etc., as supplemented hereafter.

In addition to the Design Guidelines proposed by the CWSP, Development Standards within the MU-1 land use shall be as follows:

- *Nuisances.* No operation shall be conducted on any premises in such a manner as to cause an unreasonable amount of noise, odor, dust, smoke, vibration or electrical interference detectable off the site.

- *Landscaping.* A landscaping plan for all uses (except single-family dwellings, duplexes and triplexes) including plant species, initial size, location, growth characteristics and method of irrigation shall be submitted to the Community Development Director and approved by a landscape architect prior to issuance of any permit. The required landscaping shall be installed prior to final inspection and shall be maintained by the property owner. Approval shall be based on the degree of compliance with landscape standards as adopted from time to time by the City Council and/or mandated by the State.
- *Trash and recycling storage area.* Trash and recycling bins (except single-family dwellings, duplexes, or dwelling groups) shall be provided in a fully enclosed and covered trash and recycling storage area. This area or areas shall be provided at locations that are readily accessible to residents and sanitation collectors and shall contain a hose bib and sanitary sewer drain.
- *Off-street parking.* Off-street parking shall be provided per the City of Riverbank Off-Street Parking Standards.
- *Site plan review.* Proposals to construct on a parcel shall be subject to site plan review by the Community Development Director prior to issuance of a building permit. This review shall include, but not be limited to, comparison of the Project with the Design Guidelines in Chapter 8 of the CWSP.

Mixed Use 2 (MU-2)

The MU-2 component of the Project is intended as a pedestrian-friendly environment with a mix of neighborhood serving retail uses, entertainment uses and office uses. The MU-2 areas will be highly visible from the surrounding neighborhoods within the plan area and are meant to provide basic services and gathering places to the residents of CWSP.

The maximum FAR is the allowable, buildable area of the MU-2 land use. Within the CWSP, a FAR of 0.35 is permitted for retail and neighborhood serving uses. There is potential for multi-story buildings with residential units above retail and neighborhood serving uses. These residential units would conform to the MDR standards with a density range of 8 to 16 du/ac.

The allowable land uses within the MU-2 areas of the CWSP conform to the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.076, C-1 Neighborhood Commercial Permitted Uses. Certain land uses may be permitted upon securing a Conditional Use Permit through the City of Riverbank Planning Department. Such uses are listed in the City of Riverbank Land Usage Code, Title XV, Chapter 153 – Zoning, Section 153.077, C-1 Neighborhood Commercial Conditional Permitted Uses.

In addition to the Design Guidelines proposed by the CWSP, Development Standards within the MU-2 land use shall be as follows:

- *Nuisances.* No operation shall be conducted on any premises in such a manner as to cause an unreasonable amount of noise, odor, dust, smoke, vibration or electrical interference detectable off the site.

- *Landscaping.* A landscaping plan for all uses (except single-family dwellings, duplexes and triplexes) including plant species, initial size, location, growth characteristics and method of irrigation shall be submitted to the Community Development Director and approved by a landscape architect prior to issuance of any permit. The required landscaping shall be installed prior to final inspection and shall be maintained by the property owner. Approval shall be based on the degree of compliance with landscape standards as adopted from time to time by the City Council and/or mandated by the State.
- *Trash and recycling storage area.* Trash and recycling bins (except single-family dwellings, duplexes, or dwelling groups) shall be provided in a fully enclosed and covered trash and recycling storage area. This area or areas shall be provided at locations that are readily accessible to residents and sanitation collectors and shall contain a hose bib and sanitary sewer drain. If food service, shall require tallow storage and a drain back to the grease interceptor.
- *Off-street parking.* Off-street parking shall be provided per the City of Riverbank Off-Street Parking Standards.
- *Site plan review.* Proposals to construct on a parcel shall be subject to site plan review by the Community Development Director prior to issuance of a building permit. This review shall include, but not be limited to, comparison of the Project with the approved Design Guidelines proposed by the CWSP.

Public and Quasi Public (PQ)

The purpose of the PQ land use designation is to provide facilities such as schools, fire stations, police stations or other civic buildings for use by the community at large. This land use may also be used for water storage tanks, pumping sites and well sites which would service the Plan Area. Per the City of Riverbank 2025 General Plan, two sites within the CWSP have been designated for schools and a potential fire station; however, the timing of these facilities is uncertain. The underlying land use designation for these parcels is LDR.

Buildings within the PQ land use designation of the CWSP are subject to a maximum FAR of 0.50.

Permitted uses within the PQ designation shall be for public use or for the use of the community at large. Examples of permitted uses are elementary, junior and high school sites and City/County facilities and buildings. Any permitted use is subject to request by the public agency and approval from the master developer. Any use requested in the PQ designation that is not a permitted use shall secure a Conditional Use Permit. These uses are subject to the discretion and approval by the City of Riverbank Community Development Director.

In addition to the Design Guidelines proposed by the CWSP, Development Standards within the PQ Land Use shall be subject to the Site Plan Review entitlement approval. In any instance where there is a conflict between the Development Standards, Design Guidelines and City Zoning Ordinance, the Development Standards and Design Guidelines from the CWSP will supersede and govern development within the Plan Area.

Parks / Open Space / Regional Sports Park (P)

The City of Riverbank Westside Regional Sports Park is within the boundaries of the CWSP. This regional sports park will be increased in size by a minimum of 11 acres. This regional sports park combined with a full, dual-use linear park system, neighborhood parks, and linear trails make up the park and open space network for the CWSP. The proposed elementary school site has been located close to these open space elements to allow for possible joint use of the facilities.

While the acreage calculations of park land and open space are conceptual at this stage, the CWSP will meet or exceed the City's park land requirements for both Regional Parks and Neighborhood Parks. The amount of this parkland dedication will be determined during Tentative Subdivision Map approval and will be based on the number of proposed residential lots. Any parkland area not provided within the Plan Area will need to be covered with in-lieu fees. The Plan Area is home to the 11-acre City's Regional Sports Park, which will be expanded and improved as part of the proposed Project. As shown in Figure 8, the CWSP includes an average of 9 acres of Neighborhood Park, 20-acres of dual-use park basin, and expansion of the Regional Sports Park to 22 acres. Park and open space lands used for storm drainage dual-use purposes will only be credited for 50% towards the required City of Riverbank park land dedication obligation.

Permitted uses in the Parks and Open Space designation will be limited to neighborhood parks, pocket parks, linear parks and dual use park basin facilities, water wells, tanks and other public facilities, as appropriate. Accessory buildings or structures built in conjunction with a park are also permitted in the Parks and Open Space designation.

Because of its specific function within the Plan Area, park land, landscape areas and open space are the only permitted uses for this designation. There are no conditional uses permitted. In addition to the Design Guidelines and Landscape Guidelines proposed by the CWSP, Development Standards within the Parks and Open Space Land Use shall be subject to the Site Plan Review entitlement approval in conjunction with new construction.

In any instance where there is a conflict between the Development Standards, Design Guidelines, Landscape Guidelines and City Zoning Ordinance, the Development Standards, Design Guidelines and Landscape Guidelines from the CWSP supersede and govern development within the Plan Area.

CIRCULATION AND ALTERNATIVE TRANSPORTATION

The proposed Project will expand the existing circulation system in the City of Riverbank. The Plan Area is a natural progression of the existing housing areas and street network on the southwestern side of the City and ties directly to the existing roadway network. The Plan Area is bound by Oakdale Road running north and south to the east, Claribel Road running east and west to the south. The closest main roadway to the west of the Plan Area is Coffee Road, which runs north and south. The Plan Area is bifurcated east to west by Morrill Road in the northern area of the site and Crawford Road running east to west midway of the site. Regional access to

the Plan Area is via State Route 99, which approximately seven miles west via Claribel Road. Oakdale Road and Claribel Road are classified as arterial streets in the City of Riverbank's General Plan. Arterial streets are designed to handle a higher volume of traffic and are typically placed on external boundaries of a project such as this to keep traffic moving and to prevent motorists from using the local streets. Morrill Road and Crawford Road are classified as collector streets in the City of Riverbank's General Plan. Collector streets are designed to funnel traffic onto arterials and other major roadways. Improvements are planned on Morrill Road and Crawford Road in order to accommodate the trips generated by the proposed Project. Additionally, the Project proposes to install bicycle paths and lanes within the development. These lanes will be connected where possible to existing City of Riverbank bicycle lanes to provide optimal connectivity to non-motorized modes of transportation.

Proposed Circulation System

The Plan Area is well suited for development because of the existing circulation system and roadways that exist in the vicinity. The CWSP proposes the construction of one additional collector street, running north and south of the Plan Area. This internal collector street will provide additional funneling of traffic through the Plan Area without a reliance on local streets. Several new local streets will also be constructed for the neighborhoods within the Plan Area. The exact location of these streets is unknown at this time as they will be determined during the tentative map approval process.

In addition to new roadways, the CWSP proposes to install bicycle paths and lanes within the development. These lanes will be connected where possible to existing City of Riverbank Bicycle Lanes to provide optimal connectivity to non-motorized modes of transportation. Working together, this network of roadways, bicycle lanes and walkways will provide convenient and safe access to all neighborhoods within the Plan Area. Construction of the roadway network will adhere to the adopted City Standards and Street Cross Sections. See Figure 9 for the proposed vehicular circulation system.

Arterial Streets

Arterial streets feature four travel lanes, sidewalks on both sides of the street, bike lanes and landscape strips. Arterial streets are intended to function like boulevards or thoroughfares and therefore do not allow on-street parking.

Collector Streets

Collector streets are smaller than arterials and typically only have two travel lanes, sidewalks on both sides of the street, bike lanes where applicable and landscape strips. On-street parking is allowed on collector streets as it is not uncommon for businesses to front onto collectors.

Local Residential Streets

These smaller streets are designed to handle small volume, neighborhood traffic with low speeds. The local residential streets proposed for the Project will feature two travel lanes,

sidewalk and landscape strips on both sides. On-street parking is permitted on local residential streets to provide additional parking for the residents of the neighborhoods within the plan area.

Cul-de-Sacs and Roundabouts

Cul-de-sacs are a popular street treatment in residential neighborhoods and are appealing to families with children because they provide a closed end street that does not allow through traffic. Cul-de-sacs proposed within the Plan Area will be designed and built according to City of Riverbank Street Standards and will provide adequate turning radius for emergency vehicles.

Roundabouts are often used as a method of traffic calming in neighborhoods and on collector streets and as focal points at the entrance of communities. The proposed Circulation Plan shows the possible location of roundabouts within the Plan Area. Roundabouts provide for the slowing of traffic on otherwise straight through street where speeds can escalate. Roundabouts also provide a place for public art displays, landscape treatments and traffic signage.

Proposed Alternative Transportation System

Alternative transportation includes bicycle lanes, pedestrian walkways, bus routes and other means of public transportation. Class I and Class II Bike Lanes will be integrated into the Circulation Plan for the Project. Pedestrian walkways and sidewalks will be provided throughout the Plan Area to encourage walking and jogging.

Bus routes and other public transit options will be planned for within the confines of the Plan Area. Riverbank Dial-a-Ride operates routes throughout the City and is anticipated to add additional routes as new development occurs. Stanislaus Regional Transit operates loop Route 60 through Riverbank and into Oakdale. These public transit providers will be integral partners in developing suitable bus turnout locations and bus shelter facilities within the Plan Area. To support the use of public transit, it is anticipated that these facilities will be placed near the highest intensity uses in the Plan Area including HDR and MU-1 areas. See Figure 10 for the proposed alternative transportation circulation system.

GENERAL PLAN AMENDMENTS

The proposed Project would require a City of Riverbank General Plan Amendment to the Land Use and Circulation Elements to change land uses in the Plan Area. Changes to the Land Use Element would include changing the approximately 390-acre Plan Area from LDR, MDR, HDR, MU, C, CC, and P to Specific Plan (SP). Figure 6a illustrates the current Riverbank General Plan land uses within the Plan Area. Proposed General Plan land uses are shown on Figure 7a. The proposed amendment to the City's Circulation Element would include relocation of certain planned roads identified in the General Plan.

SPECIFIC PLAN APPROVAL

A specific plan requires adoption by resolution or ordinance, following public hearings before both the Planning Commission and the City Council. Additional entitlement applications that are

necessary for the implementation of the Specific Plan may be made concurrently with the Specific Plan application.

ANNEXATION

The Plan Area is currently within Stanislaus County, and within the City of Riverbank's SOI. The proposed Project would result in the annexation of the APNs described in Table 1 into the City of Riverbank. This EIR covers the annexation of the parcels into the City of Riverbank, and it is intended to be used by Stanislaus County Local Agency Formation Commission (LAFCo) for their consideration of the annexation. Annexation of the Plan Area is consistent with the growth plans for the City of Riverbank.

PRE-ZONING

The Plan Area is currently within the jurisdiction of Stanislaus County. The County zoning for the entire Plan Area is A-2-40. The Stanislaus County Local Agency Formation Commission (LAFCo) will require the Plan Area to be pre-zoned by the City of Riverbank in conjunction with the proposed annexation. The City's pre-zoning for the Plan Area will include the Specific Plan (SP) zoning designation. The pre-zoning would go into effect upon annexation into the City of Riverbank. The proposed pre-zoning for the Plan Area is shown on Figure 7b.

UTILITIES AND PLANNED INFRASTRUCTURE IMPROVEMENTS

The construction of onsite infrastructure improvements would be required to accommodate development of the proposed Project, as described below.

Water System

The existing and proposed water system, as well as the City's water standards and guidelines, are discussed in detail below.

Existing Conditions

The City of Riverbank Domestic Water System provides two connection points for the proposed Project. There is an 8-inch line existing in Morrill Road just west of Oakdale Road that was constructed to serve the Riverbank Sports Complex in the northern end of the Plan Area. The 8-inch line connects to the City's existing water system at the intersection of Oakdale Road and Morrill Road and ultimately contributes to the residential water supply system east of Oakdale Road. The second connection is an existing 12" stub across Oakdale Road at Crawford Road. This line was placed during construction of the existing Crossroads development in anticipation for future growth to the west.

Proposed Water System

See Figure 10 for the proposed water system. Domestic water service will be provided to the Plan Area through the installation of water mains in the proposed arterial and collector roadways. Each land use will be connected to these main lines through an interconnected master water system. The installation of a 12-inch water main line from the existing stub at Crawford Road will service a portion of the Plan Area. Flows and demands for that portion of

the Plan Area will be determined at the design stage of development. This 12-inch line will serve as the initial supply for the first phase of development which is likely to occur on the east side of the Plan Area.

With the development of the MU-1 property at the corner of Claribel Road and Oakdale Road, connections will be made through a loop water system connecting to existing water lines in Oakdale Road and to a new water line constructed along the Claribel frontage of the MU-1 property. These lines will be looped through the Plan Area to serve development. In the future, when the new north south collector road is constructed as part of the residential development north of MID Lateral 6, and the MID Lateral 6 roadway crossing is constructed, the water lines north of MID Lateral 6 will be stubbed to the south side of MID Lateral 6 for future connection at the time of development of the MU-1 site.

In addition to the installation of water main lines, the proposed Project includes construction of a 1.69-million-gallon water tank to be in the linear park near MID Lateral 6. A booster pump station will be constructed in conjunction with the water tank to distribute water to areas that will not be adequately served by the 12-inch main line. The ultimate water system build out will feature a tie-in to the existing 12-inch line which will provide uniform water distribution for the balance of the Plan Area. A new water well is proposed to be located in the Regional Park expansion area near the MID Main Lateral in the northern portion of the Plan Area. This well will be used to supplement the overall water system for Crossroads West.

The construction timing of the new water tank and well will be determined by a water balance and consumption report prepared at the time of site development. All water improvements shown are part of the City's Master Water Plan and are funded through the payment of City capital fees, also known as System Development Fees. If an adequate amount of fee revenue has not been collected when the well and/or tank are required, the developer will be required to front the cost of the master water improvements, subject to reimbursement through fee offsets, and/or repayments as fees are collected from other areas in the City.

The City of Riverbank Public Works Department will be responsible for the operation and maintenance of the proposed water supply, transmission main lines, water storage tank, and well site upon approval and certification of the Improvement Plans submitted by the master developer.

Water Standards and Guidelines

The City of Riverbank requires all new residential, commercial mixed use, or industrial development to be served by a public water system. The proposed water system will be designed and constructed to operate at levels established by the City's Public Works Department. Standards and guidelines for the domestic water system shall include:

- Ensure the construction of a water system with adequate supply, transmission, and storage to meet the needs of the CWSP.
- Minimum water pressure shall be provided based on standards established by the City; this pressure shall be adequate throughout the day and during peak hour demands.

Minimum fire flows must be provided based on standards established by the City's Fire Department and Public Works Department.

- Individual water meter stubs will be provided to all new Mixed Use tenants and residential dwelling units; a water connection fee shall be charged for each meter requested based on the most current impact fee schedule established by the City.

Sanitary Sewer System

The existing and proposed sanitary sewer system, as well as the City's sanitary sewer standards and guidelines, are discussed in detail below.

Existing Conditions

The CWSP intends to tie-in to the City of Riverbank's existing sanitary sewer system at two different locations. An 8-inch line in Morrill Road, west of Oakdale Road, was installed to service the Regional Sports Park in the northern portion of the Plan Area. This line ties into the sewer manhole at the intersection of Oakdale Road and Morrill Road and is ultimately a part of the residential sewer collection system. An 18-inch line runs across Oakdale Road to Crawford Road, which was planned for the future development of the CWSP. This stub is an extension of the main trunk line that services the existing Crossroads development to the east and extends to Roselle Avenue.

Proposed Sanitary Sewer System

See Figure 11 for the proposed sanitary sewer system. To adequately service the Plan Area, new sewer main lines and an extension of the 18" trunk line will be constructed in the new arterial and collector roads in the Plan Area. These improvements will service the majority of the Plan Area; however, a portion of development south of Crawford Road will be required to utilize a sewer pump station that will be placed in the southwest portion of the site, near the MU-1 land use.

An 18-inch line in Crawford Road; a 10-inch line in Morrill Road; and an 8-inch line where Crawford Road intersects the westerly boundary of the Plan Area. All new sewer lines will be installed at varying slopes to provide the best service for the proposed Project. Should any area develop prior to the necessary sewer improvements or trunk line extension, this flow may be required to utilize a temporary lift station that connects to the 10-inch line in Morrill Road.

The development of the MU-1 property may require the construction of an interim sewer connection to the existing sewer line at the intersection of Oakdale Road and Crawford Road. If the MU-1 property proposes to develop in advance of substantial residential development north of MID Lateral 6, an interim sewer lift station can be constructed on the MU-1 property to serve the entire site and be connected by way of a force main and gravity lines to Oakdale Road on the eastern edge of the MU-1 property and up Oakdale Road to the Crawford Road connection. At the time the residential development occurs north of MID Lateral 6, and concurrent with the construction of the north-south collector roadway through the Plan Area and the construction of the bridge over MID Lateral 6, the sewer line will be extended to the south side of MID Lateral 6 to allow for a gravity connection from within the MU-1 property. If this occurs in advance of

development of the MU-1 property, then this connection will be available to serve the MU-1 property. If the MU-1 property site has constructed a temporarily lift station and connection along Oakdale Road, at the time the new sewer connection becomes available, the temporary pump station and force main will be abandoned and connected to the new gravity sewer line.

A preliminary analysis was performed on the downstream system in Roselle, north of the Crawford Road Lift Station (CRLS). The existing flows from the CRLS are greater than the capacity in the stretch of 18-inch from CRLS to Talbot Lift Station (TLS) and from TLS to First Street. Therefore, a force main or a new and larger gravity main would need to be extended to a point downstream where the existing gravity sewer has adequate capacity.

The reduction of the CRLS flows from the TLS flows would be 1,172 gallons per minute (gpm) ($3,272 - 2,100 = 1,172$). This flow is less than the 80 percent full capacity of the 18-inch line it currently ties into. Therefore, the existing line could remain and be utilized by the TLS. As mentioned above, the CRLS would need to have a force main extended past the TLS to a point where the gravity line could accept the flow plus any additional flow due to future upgrades to the CRLS. A proposed solution to the lack of capacity would be to extend a 16-inch force main from CRLS to the existing 30-inch sewer main near First Street.

Sanitary Sewer Standards and Guidelines

The City of Riverbank Sewer Collection System Master Plan provides the design criteria required for all new gravity flow sewer systems constructed within the City. The following criteria will apply to the sanitary sewer system installed for the Project:

- Ensure the construction of a sanitary sewer system with adequate transmission and storage to meet the needs of the CWSP.
- Sewers are required to be sized to meet minimum flows of 40 to 70 percent full.
- Maximum depth for sewer trunk lines is 30 feet; minimum depth for trunk lines is six feet.
- All future sewer lines, which will be incorporated into the sewer collection network, will be required to be comprised of mainly 8-inch lines and, where applicable, 6-inch lines.

Storm Drainage System

The following discussions provide details and guidelines which show the adherence to the City of Riverbank's LID Practices, MS4 Permit Regulations and CASQA compliance.

Existing Conditions

Currently, the Regional Sports Park located at the northern end of the Plan Area is the only existing development within the CWSP boundary that has drainage facilities to accommodate storm water runoff. The facilities at the Regional Sports Park were developed as part of the overall plan for the Park and tie into the existing City of Riverbank facilities located in Morrill Road and Oakdale Road. Any remaining storm runoff flows onto adjacent properties as there are no other formal drainage systems in the area. Some water is retained on-site and is used for

the agricultural uses that exist on the site. The runoff generally flows to the south and west as that is how the Plan Area naturally slopes.

Proposed Storm Drainage System

The City of Riverbank adopted a Low Impact Development Design and Specifications Manual to assist developers in meeting State and local mandates for storm water drainage. Negative impacts to the Stanislaus River, the San Joaquin Delta and regional wildlife have prompted many municipalities to design and adopt LID practices and guidelines. The CWSP is identified as a greenfield/rural residential property in the Low Impact Development Design and Specifications Manual and does not have any other land data available due to it being outside the current City limit line.

Figure 12 presents the proposed storm drain system. A standalone drainage system that will detain all storm water runoff on-site in detention basins is proposed. Because of the greenfield/rural residential designation within the Low Impact Development Design and Specifications Manual, maintaining existing hydrological conditions by conserving natural areas and existing drainage features is an important consideration, where possible. Impervious hardscape surfaces (i.e., conventional roofs and paving) will be designed to discharge to pervious areas to help filter and infiltrate the stormwater runoff. To further aid infiltration, native soil compaction in landscaped areas will be minimized.

Land planning for CWSP, the preliminary drainage studies, and the preliminary drainage design are integrated to emphasize water conservation, protect water quality, help reduce flooding, and improve the overall watershed health. The proposed LID practices are appropriate for the local and existing conditions found in the Plan Area.

The Project proposes to construct and use three major storm water detention basins. The first proposed basin may be located in the 11-acre expansion proposed for the Regional Sports Park and will drain the areas north of Morrill Road. The two remaining detention basins will be located north and south of the major collector road on the west side of the Plan Area.

Soil boring and percolation testing in the locations of the proposed retention ponds has been performed. Each pond had two percolation tests performed for a total of six tests along with one deep boring at each pond to classify the deeper underlying soil. The percolation tests were performed at a depth that would be consistent with the proposed bottom of the proposed retention ponds. These rates will be used as recommended in the report for design and sizing of the retention ponds. The deeper tests may be utilized for the design of an absorption trench to percolate any nuisance water that may occur.

LID practices can greatly improve storm water quality by encouraging processes (such as sedimentation, filtration, or evapotranspiration) which reduce the pollutants present in urban and suburban runoff. The CWSP will utilize LID guidelines and specifications throughout the proposed storm drainage system to ensure better water quality, recharging of ground water supplies where feasible, and reduce community infrastructure costs. While the City of Riverbank collects fees for storm water collection and disposal, the Plan Area will be exempted

from these fees. This exemption is appropriate as the CWSP will construct all necessary storm water collection and disposal facilities to serve the Plan Area, as well as set up a Community Facilities District (CFD) or similar type financing district to maintain the system. Should the City require any of these facilities to provide capacity above and beyond the needs of the CWSP, reimbursement may be considered.

Best Management Practices (BMP'S) go hand in hand with LID guidelines to help address significant water quality issues and hydrologic concerns that developments create. Several design goals are required by the City, including:

- conserve natural areas and drainages;
- minimize impervious surfaces, drain to pervious area;
- minimize soil compaction;
- mitigate peak runoff and associated erosion; and
- treat runoff in storm water BMPs.

Construction of the Project is anticipated to be phased and will be directed by demand and need. Because of this, temporary basins will be needed to handle storm water runoff until the permanent facilities are constructed. Water levels will not exceed four feet with two feet of freeboard for the temporary storm drain basins.

The landscape in the storm drain basins will serve two purposes: provide a visually appealing place for recreational activities, and serve as retention and assist in the detention of storm water runoff. Through the use of bio-swales, infiltration, inlets, and conduits, storm water will be managed efficiently while adhering to the strict standards set forth by the City of Riverbank LID Practices.

The MU-1 property of the CWSP intends to utilize onsite storage and transmission to the existing offsite basin in the existing Crossroads development. Preliminary calculations that were computed for the site and existing grades helped to determine that the existing basin just east of Oakdale Road and south of MID Lateral 6 has approximately 8 acre-feet of additional storage capacity available to serve the proposed Project. The on-site basin MU-1 is intended to be used in conjunction with underground storage of storm water, surface water storage in parking areas, and landscaped swale areas. The design and construction of these improvements will adhere to the City's LID Practices.

The MU-2 property will either need its own on-site collection system, or may tie into the collection facilities north or south of Morrill Road. The location of this connection will be determined as development occurs.

The MID Discharge Agreement currently on file for the existing Crossroads development will be modified to accommodate the proposed Project. The agreement currently permits the discharge out of existing basins into the MID Lateral 6 and will be modified to add the additional discharge from the proposed Project. On-site percolation will also be utilized if it is determined through soils analysis that storm water disposal is needed.

All new construction projects in the City of Riverbank are classified in the Low Impact Development Design and Specifications Manual based on their intended use (i.e., residential, Mixed Use 1 and 2, parking areas, etc.). The following design standards must be implemented for all project classifications:

- Mitigate peak run-off flow rates
- Conserve and create natural areas
- Minimize storm water pollutants of concern
- Protect slopes and channels
- Provide storm drain stenciling and signage
- Properly design outdoor material, trash, and recycling storage areas
- Provide proof of ongoing BMP practices and maintenance
- Incorporate treatment control BMP's for water quality

LID practices are most effective when they are dispersed throughout a development project. The CWSP has been designed with this in mind and features linear park drainage basins running north and south throughout the Plan Area. Treatment and attenuation of flows throughout the Plan Area can be achieved by draining sidewalks to vegetated filter strips, constructing parking lots with permeable pavement, and outletting roof leaders to the surface of a bio-retention area.

The Plan Area features mostly Greenfield Sandy Loam and Madera Sandy Loam soil with a hardpan layer below, anywhere from 20- to 54-inches from the surface. Hardpan conditions affect most of Riverbank and call for special consideration when considering filtration options for projects. Infiltration is acceptable for the CWSP because the hardpan layer is at a depth less than 10 feet and the soils types are well draining.

To summarize, the CWSP will conform to and utilize the LID practices set forth by the City of Riverbank. A combination of methods will be used in the Plan Area including underground filtration, which will be integrated into parking areas and landscape areas; bio-retention areas, such as the park basins; vegetated swales, which can be located in street landscape areas and parking lots; filter strips, designed to treat sheet flow from adjacent surfaces; and permeable pavement, which is a porous, load-bearing pavement that allows storm water runoff to pass through its surface layer.

Dry Utilities

Dry utilities for the Plan Area include electricity, natural gas, and telecommunication services. These services are not typically provided by the City and, therefore, rely on outside service providers. This section provides details on the dry utility providers who will service the Plan Area.

Electricity

Electricity service is available from two service providers for the CWSP area. Pacific Gas & Electric (PG&E) and MID show the Plan Area within their service boundaries and have

confirmed adequate supply for the area. While PG&E is available in the Plan Area, MID has facilities close by and, therefore, will be the primary electricity provider for the proposed Project. New power transmission lines will be installed underground, which conforms to the City Development Standards. Each MU-1 tenant and residential unit will be individually metered for their electricity use.

Natural Gas

The entire Plan Area falls within the service boundary for PG&E and, therefore, they will be the natural gas provider. Similar to electricity service, new transmission lines will be installed underground for the Project, which meets City requirements. Individual connections for retail tenants and residential units will be established for usage and billing purposes.

Telecommunications

Telecommunications services include phone service, fiber optics, and cable television. AT&T Residential Division will be the primary phone and fiber optic provider for residents of the Project. Charter Communications will be the primary cable television provider. AT&T Business Division will be the primary provider for the retail, MU-1, and civic uses within the Plan Area. As with the other utilities, all new transmission lines will be constructed underground to meet the requirements of the City.

Dry Utility Standards and Guidelines

The following criteria will apply to the dry utilities installed for the Project:

- Tentative subdivision maps and or development plans shall be submitted to the City and appropriate utility companies to confirm the location, sizing, and availability of service to the Plan Area.
- Builders within the Plan Area shall coordinate with all dry utility providers to ensure proper design guidelines and criteria are met when preparing improvement plans.
- Telecommunication services shall be provided to every residential unit within the Plan Area to enhance the opportunity for telecommuting and home-based businesses, thereby reducing the impacts related to transportation and air quality.
- All new transmission lines for electricity, natural gas, and telecommunications shall be constructed underground per City of Riverbank requirements, unless otherwise noted and approved by the City and the utility provider. This includes all transformers and secondary boxes. Switch gear boxes shall be properly screened from public view. Special attention shall be made to prevent any utility box from being a target for graffiti.
- Existing overhead transmission lines shall be placed underground, where practical.
- Service standards for dry utilities providers are established and enforced by the California Public Utilities Commission.

REQUESTED ENTITLEMENTS AND OTHER APPROVALS

The City of Riverbank will be the Lead Agency for the proposed Project, pursuant to the State Guidelines for Implementation of CEQA, Section 15050. Actions that would be required from the City include, but are not limited to, the following:

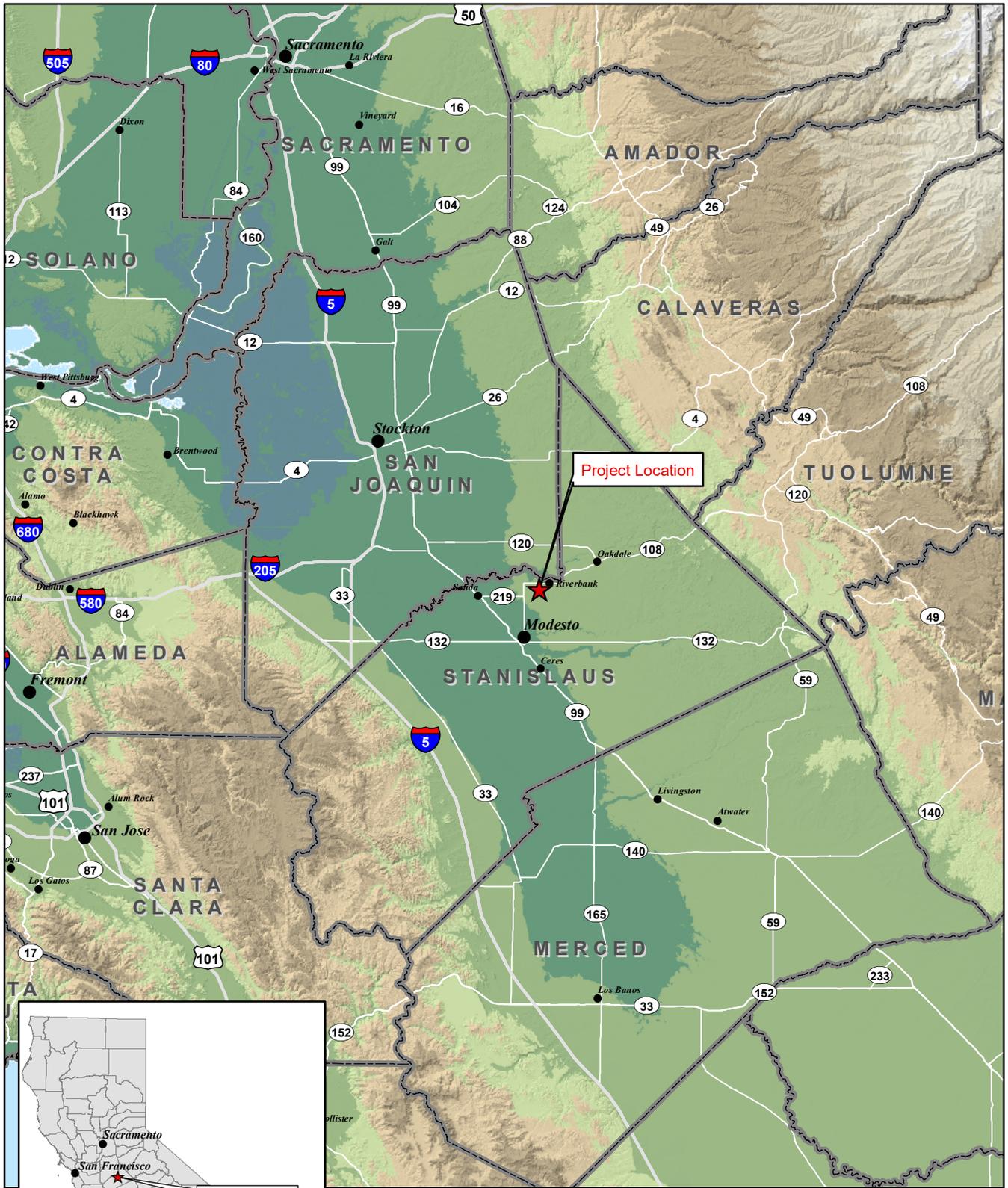
- Certification of the EIR;
- Adoption of the Mitigation Monitoring and Reporting Program;
- Approval of City of Riverbank General Plan Amendments;
- Approval of City of Riverbank Pre-zoning;
- Approval of Annexation;
- Approval of Specific Plan;
- Approval of Development Agreement;
- Approval of Subdivision Improvement Agreement;
- Approval of future tentative and final maps;
- Approval of future Improvement Plans;
- Approval of future Grading Plans;
- Approval of future Building Permits;
- Approval of future Site Plan and Design Review;
- City review and approval of Project utility plans; and
- Formation of a finance district (i.e. CFD or other finance district).

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED (E.G., PERMITS, ETC.)

The following agencies may be required to issue permits or approve certain aspects of the proposed Project. Other governmental agencies that may require approvals in connection with the Project include, but are not limited to, the following:

- California Department of Fish and Wildlife (CDFW);
- California Department of Transportation (Caltrans);
- Central Valley Regional Water Quality Control Board (CVRWQCB) - Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities pursuant to the Clean Water Act;
- Stanislaus LAFCO - Annexation;
- San Joaquin Valley Air Pollution Control District (SJVAPCD) - Approval of construction-related air quality permits;
- San Joaquin Valley Air Pollution Control District (SJVAPCD) - Authority to Construct, Permit to Operate for stationary sources of air pollution;
- Stanislaus County Health Department - Approval of restaurants and grease interceptors; and
- State Water Resources Control Board (SWRCB).

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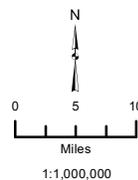


Project Location



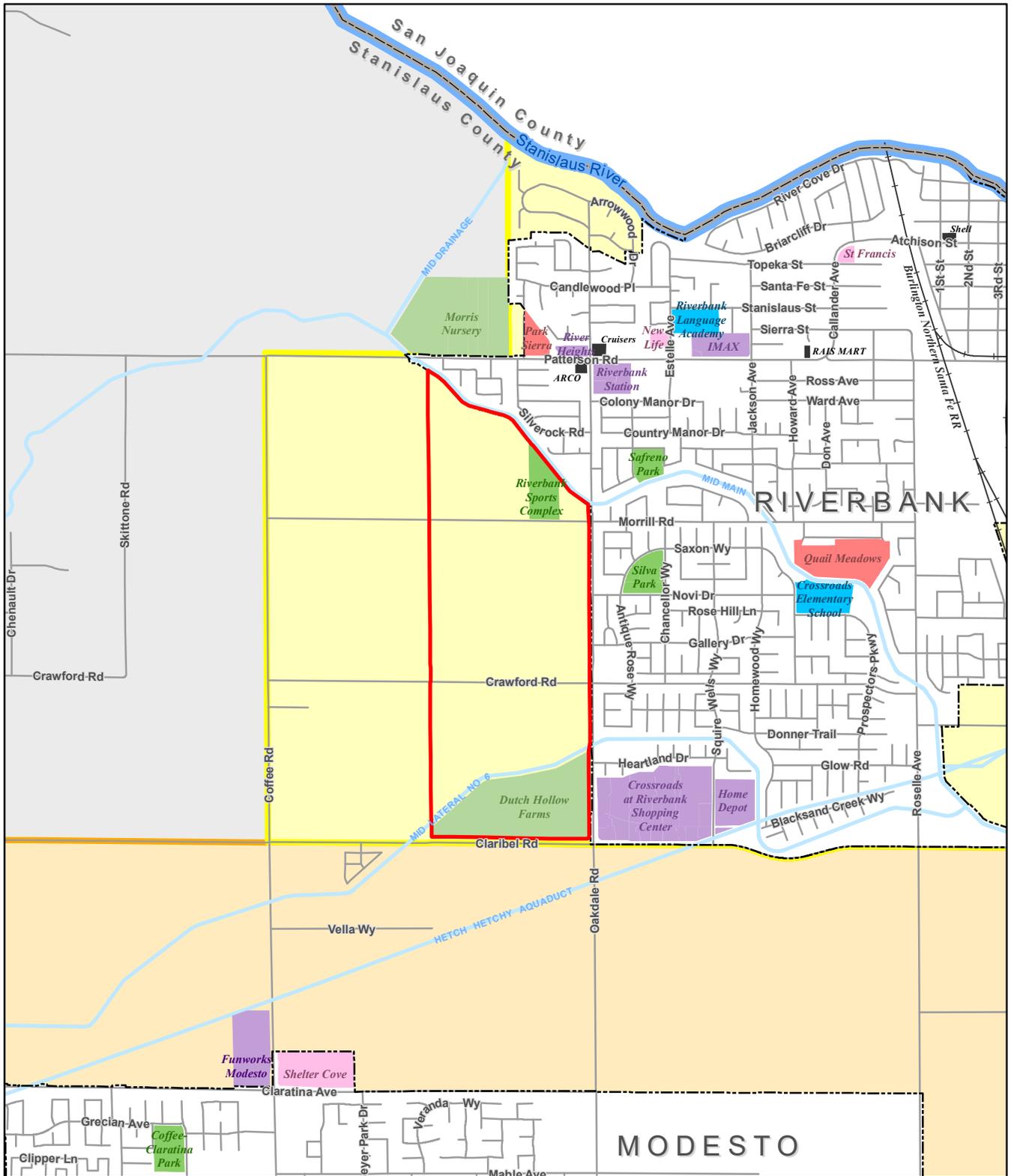
Project Location

CROSSROADS WEST SPECIFIC PLAN
Figure 1. Regional Location Map



Sources: CalAtlas. Map date: January 17, 2017.

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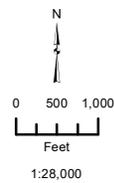


Legend

- Project Boundary
- City Boundary
- Riverbank SOI
- Modesto SOI
- County Boundary
- Canal
- Stanislaus River
- School
- Park
- Church
- Shopping/Entertainment
- Mobile Home Park
- Nursery/Farm
- Gas Station

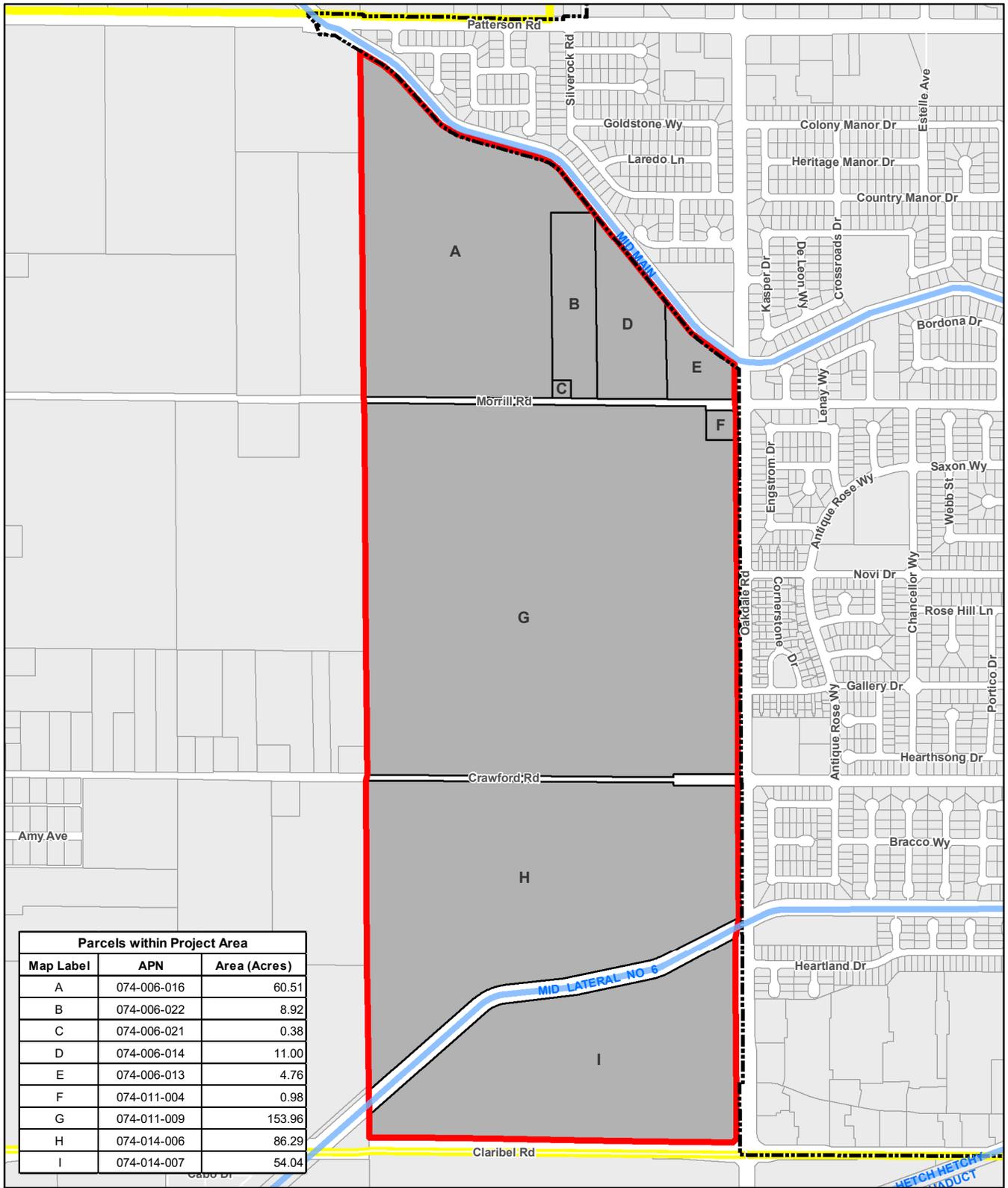
CROSSROADS WEST SPECIFIC PLAN

Figure 2. Vicinity Map



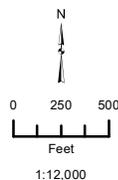
Sources: Stanislaus County GIS; Google Maps. Map date: January 18, 2017.

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Legend

- Project Boundary
- Assessor's Parcels
- Assessor's Parcels within Project Boundary
- Riverbank City Boundary
- Riverbank Sphere of Influence
- Canal

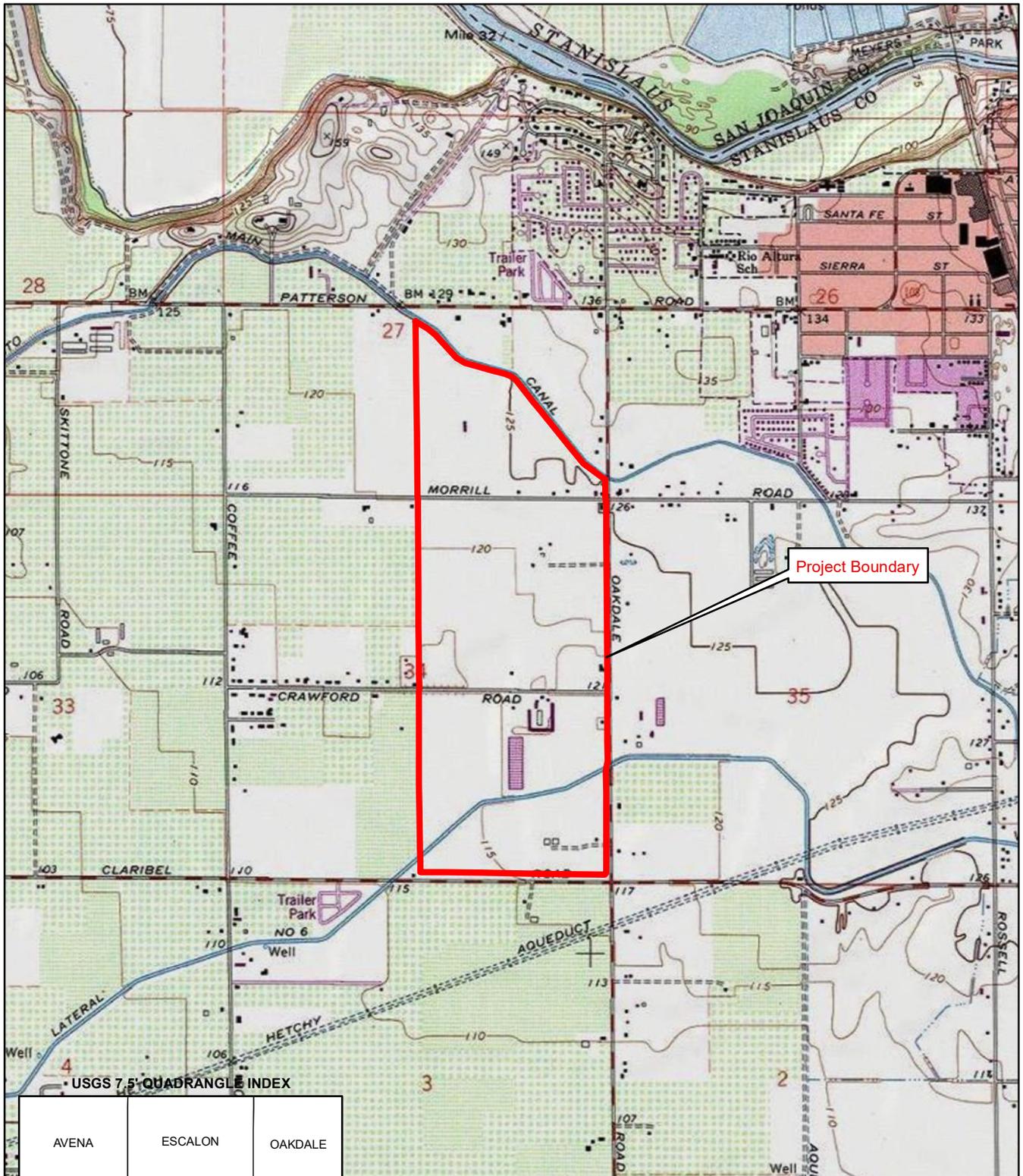


CROSSROADS WEST SPECIFIC PLAN

Figure 3. Assessor's Parcel Map

Sources: Stanislaus County GIS. Map date: January 17, 2017.

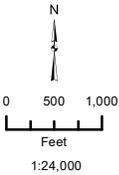
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USGS 7.5' QUADRANGLE INDEX

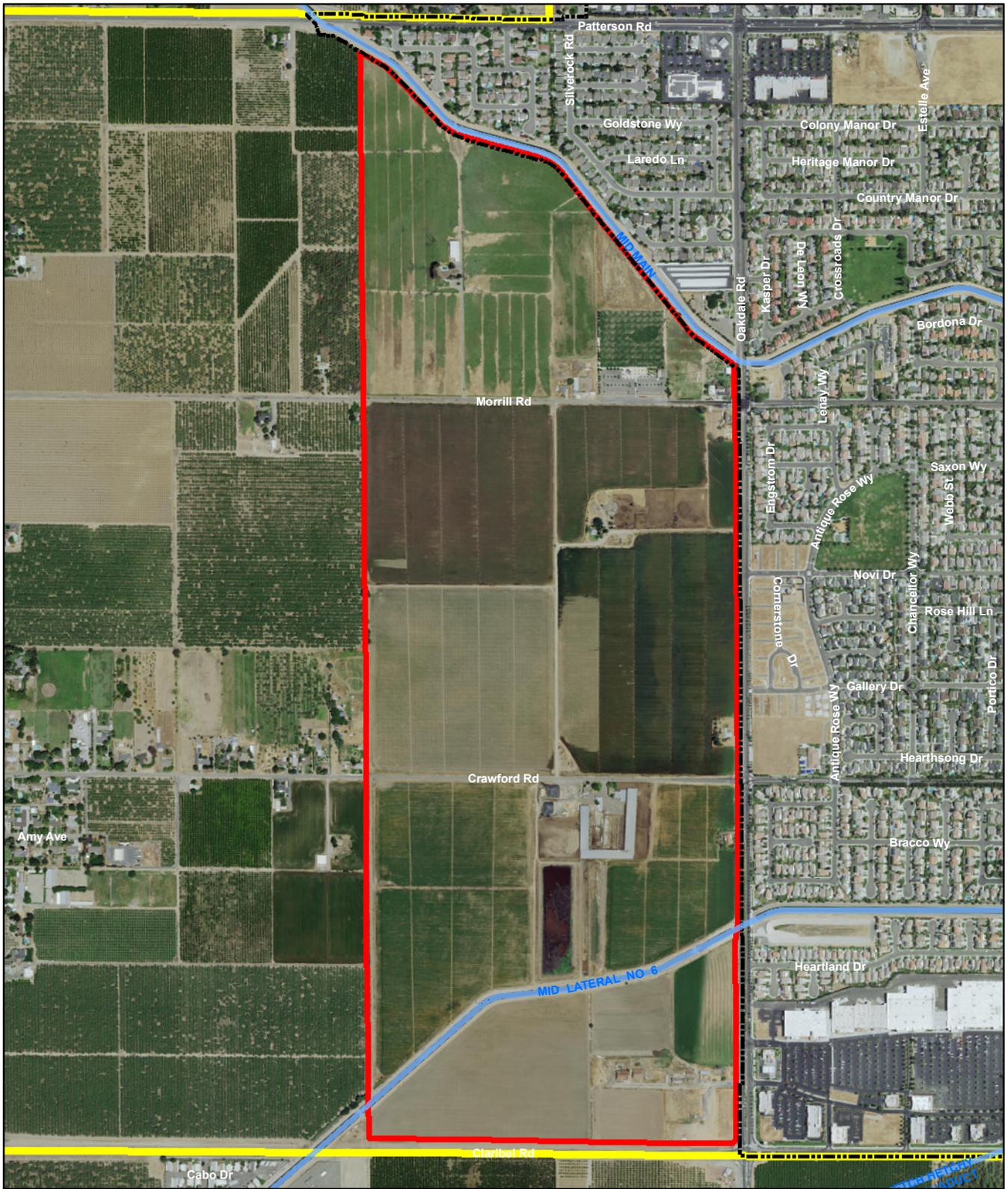
AVENA	ESCALON	OAKDALE
SALIDA	RIVERBANK	WATERFORD
BRUSH LAKE	CERES	DENAIR

CROSSROADS WEST SPECIFIC PLAN
 Figure 4. USGS Topographic Map
 Riverbank Quadrangle



Sources: Stanislaus County GIS; ArcGIS Online USGS Topographic Map Service. Map date: January 17, 2017.

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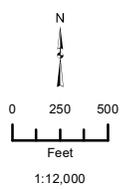


CROSSROADS WEST SPECIFIC PLAN

Figure 5. Aerial View of Project Site

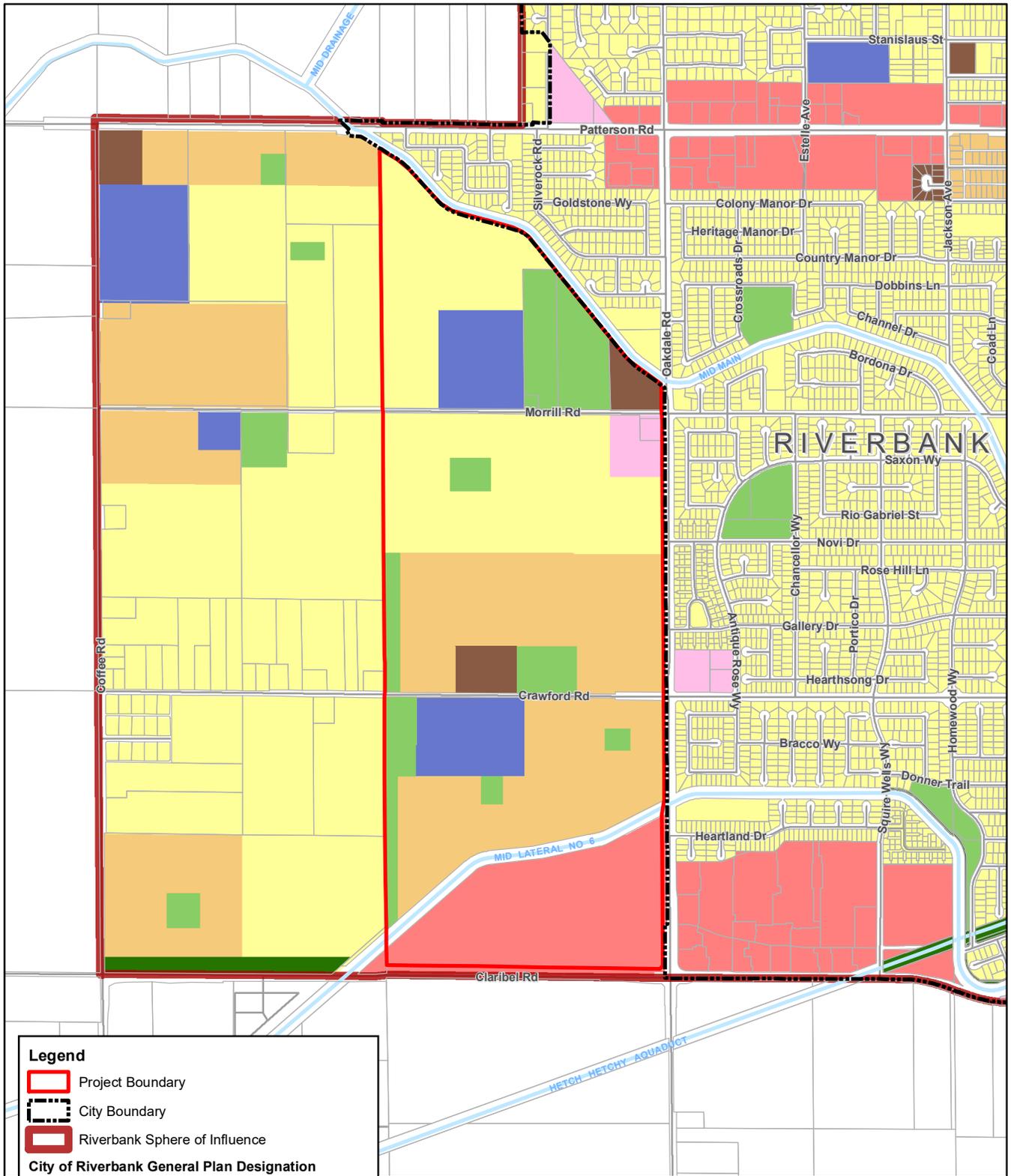
Legend

-  Project Boundary
-  Riverbank City Boundary
-  Riverbank Sphere of Influence
-  Canal



Sources: Stanislaus County GIS; ESRI's ArcGIS Online World Imagery Map Service. Map date: January 17, 2017.

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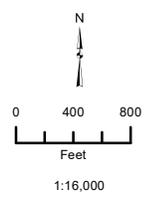


Legend

- Project Boundary
- City Boundary
- Riverbank Sphere of Influence

City of Riverbank General Plan Designation

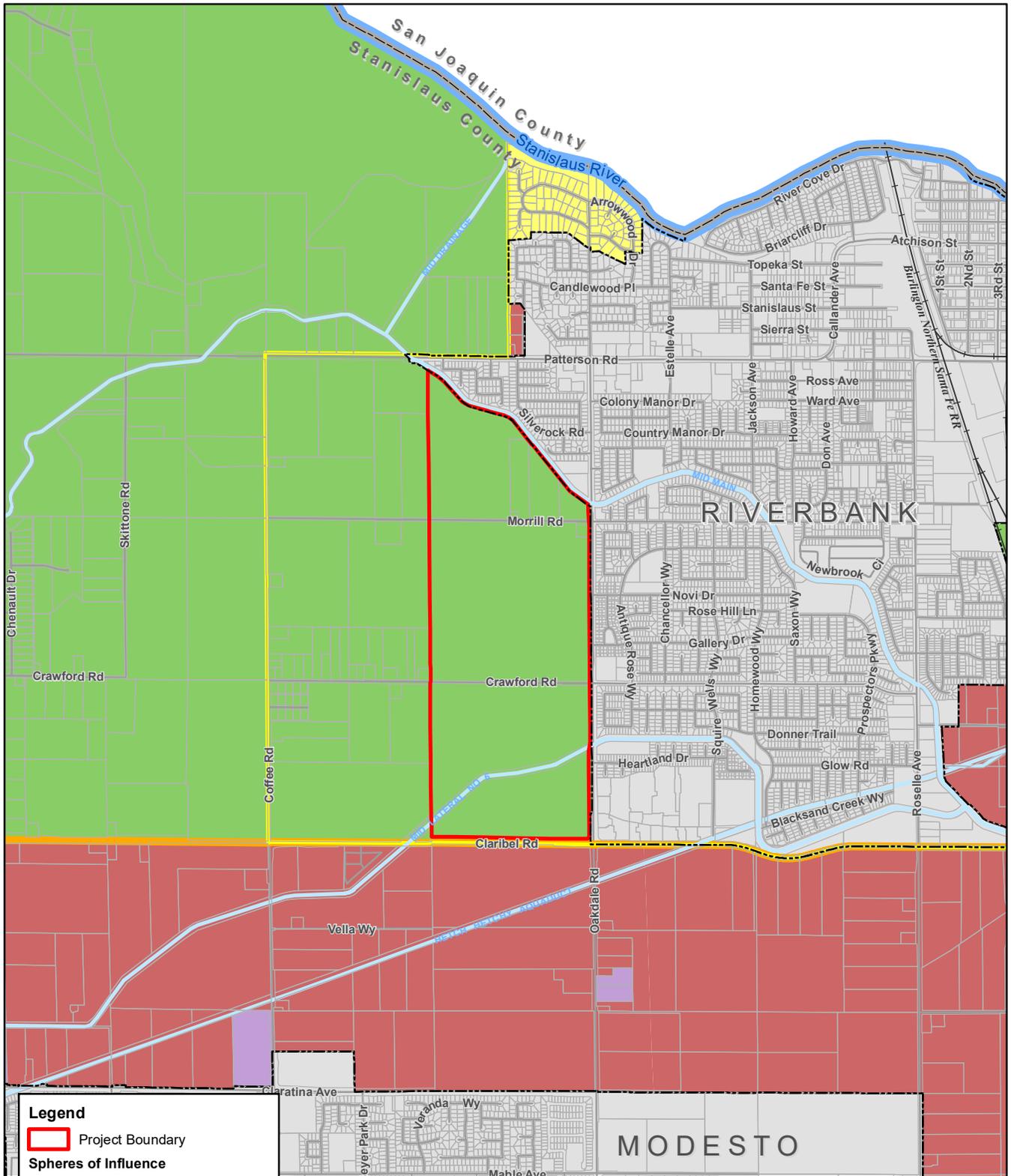
- LDR:Low Density Res 0-8 Units Per Acre
- MDR:Medium Density Res 8-16 Units Per Acre
- HDR:Higher-Density Res 16+ Units Per Acre
- C:Civic
- C/C:Community Commercial
- MU:Mixed Use
- B/G/OS:Buffer/Greenway/Open Space
- P:Park



CROSSROADS WEST SPECIFIC PLAN
 Figure 6a. Existing General Plan Land Use Designations
 City of Riverbank

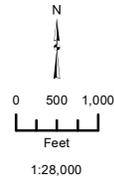
Sources: Stanislaus County GIS. Map date: February 8, 2017.

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Legend

- Project Boundary
- Spheres of Influence**
- Riverbank SOI
- Modesto SOI
- County General Plan Designation**
- AG-Agriculture
- LDR-Residential - Low Density
- PD-Planned Development
- UT-Urban Transition
- City Area



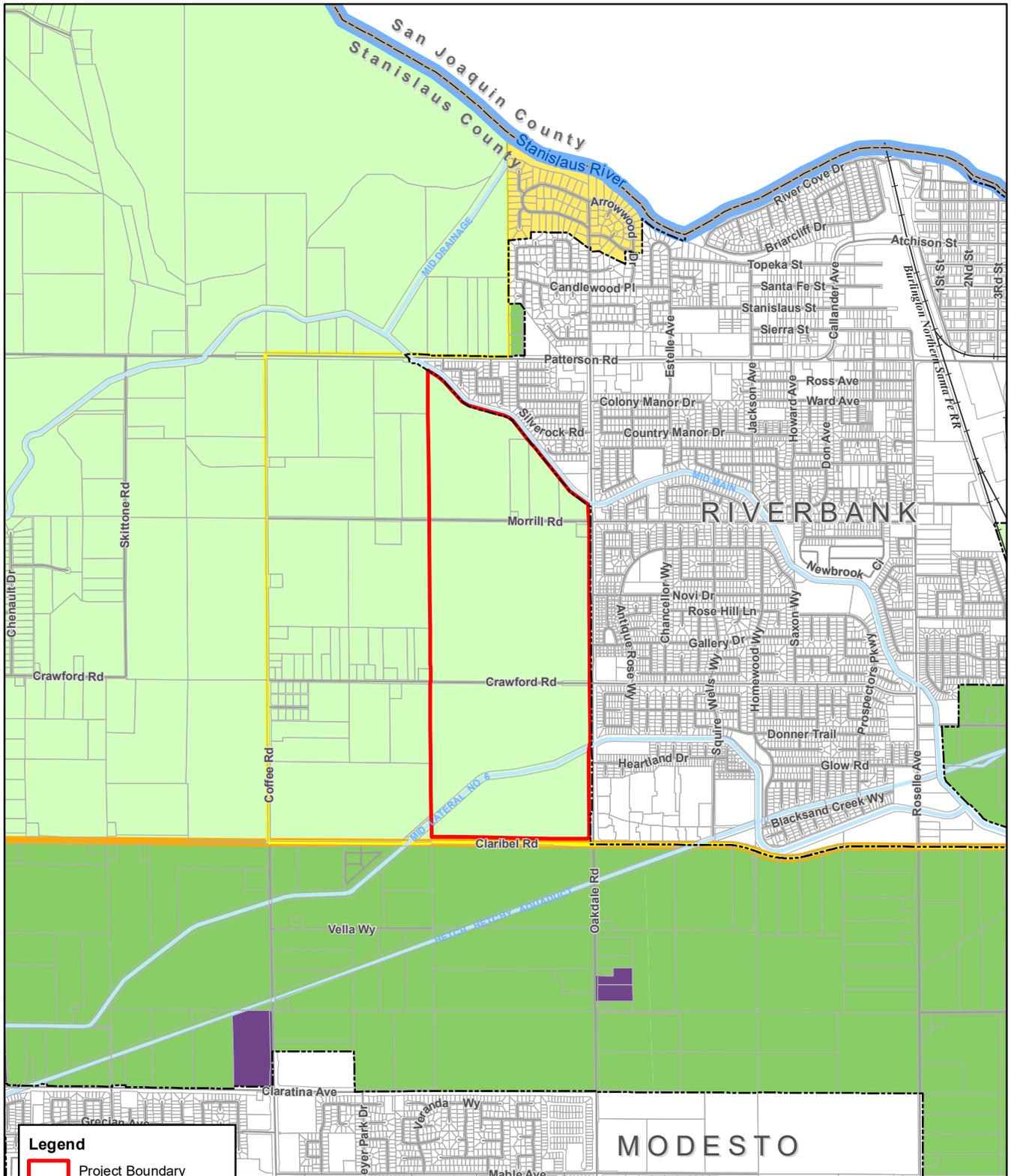
CROSSROADS WEST SPECIFIC PLAN

Figure 6b. Existing General Plan Land Use Designations

Stanislaus County

Sources: Stanislaus County GIS. Map date: February 8, 2017.

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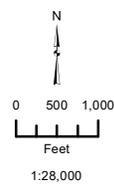
Legend

- Project Boundary
- Spheres of Influence**
- Riverbank SOI
- Modesto SOI
- County Zoning Designations**
- Rural Residential
- General AG 10 Acre UT
- General AG 40 Acre
- Planned Development

CROSSROADS WEST SPECIFIC PLAN

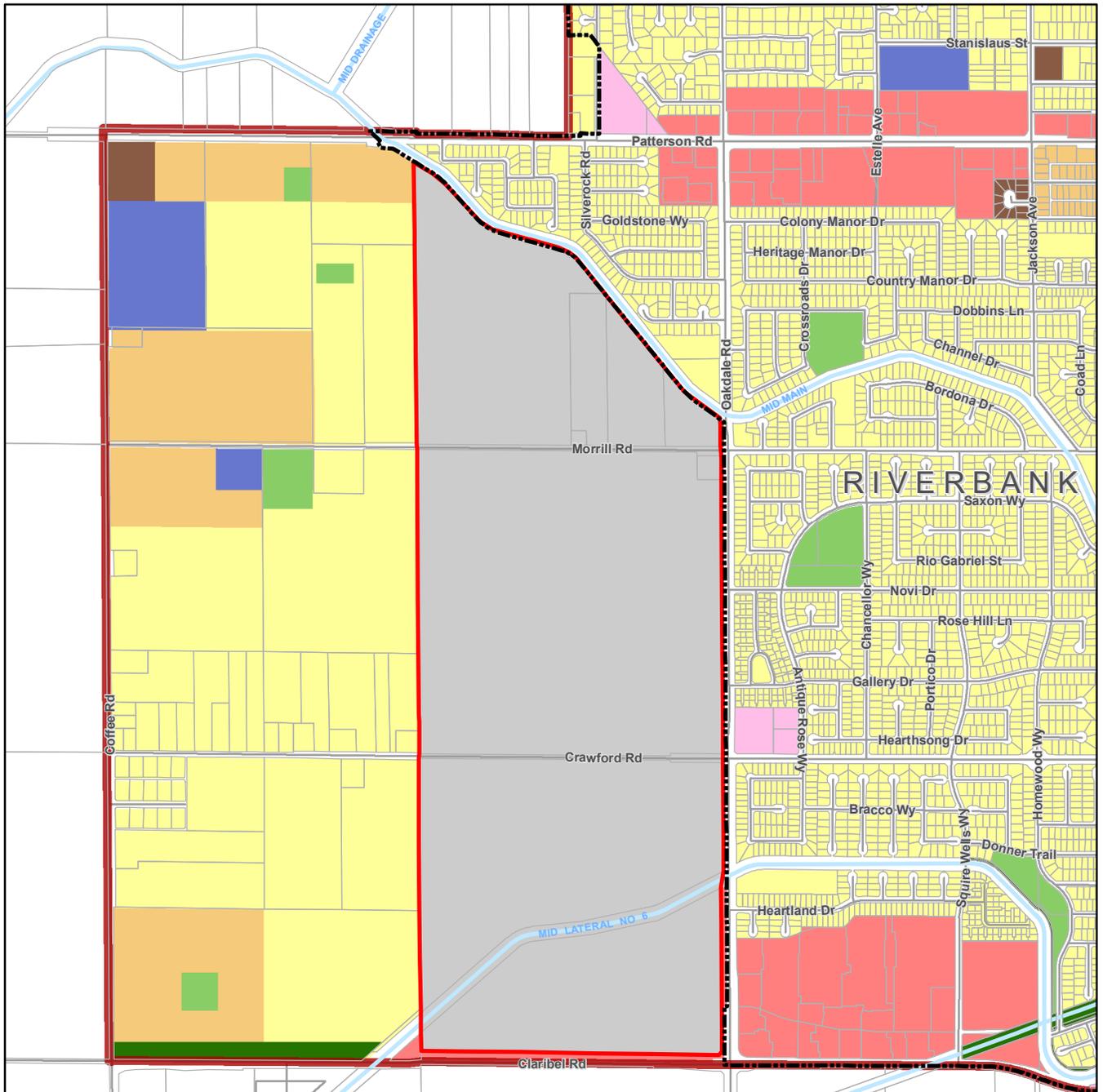
Figure 6c. Existing Zoning Designations

Stanislaus County



Sources: Stanislaus County GIS. Map date: February 8, 2017.

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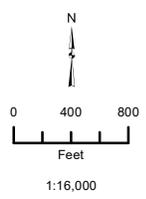


Legend

- Project Boundary
- City Boundary
- Riverbank Sphere of Influence

City of Riverbank General Plan Designation

- LDR:Low Density Res 0-8 Units Per Acre
- MDR:Medium Density Res 8-16 Units Per Acre
- HDR:Higher-Density Res 16+ Units Per Acre
- C:Civic
- C/C:Community Commercial
- MU:Mixed Use
- B/G/OS:Buffer/Greenway/Open Space
- P:Park
- SP: Specific Plan



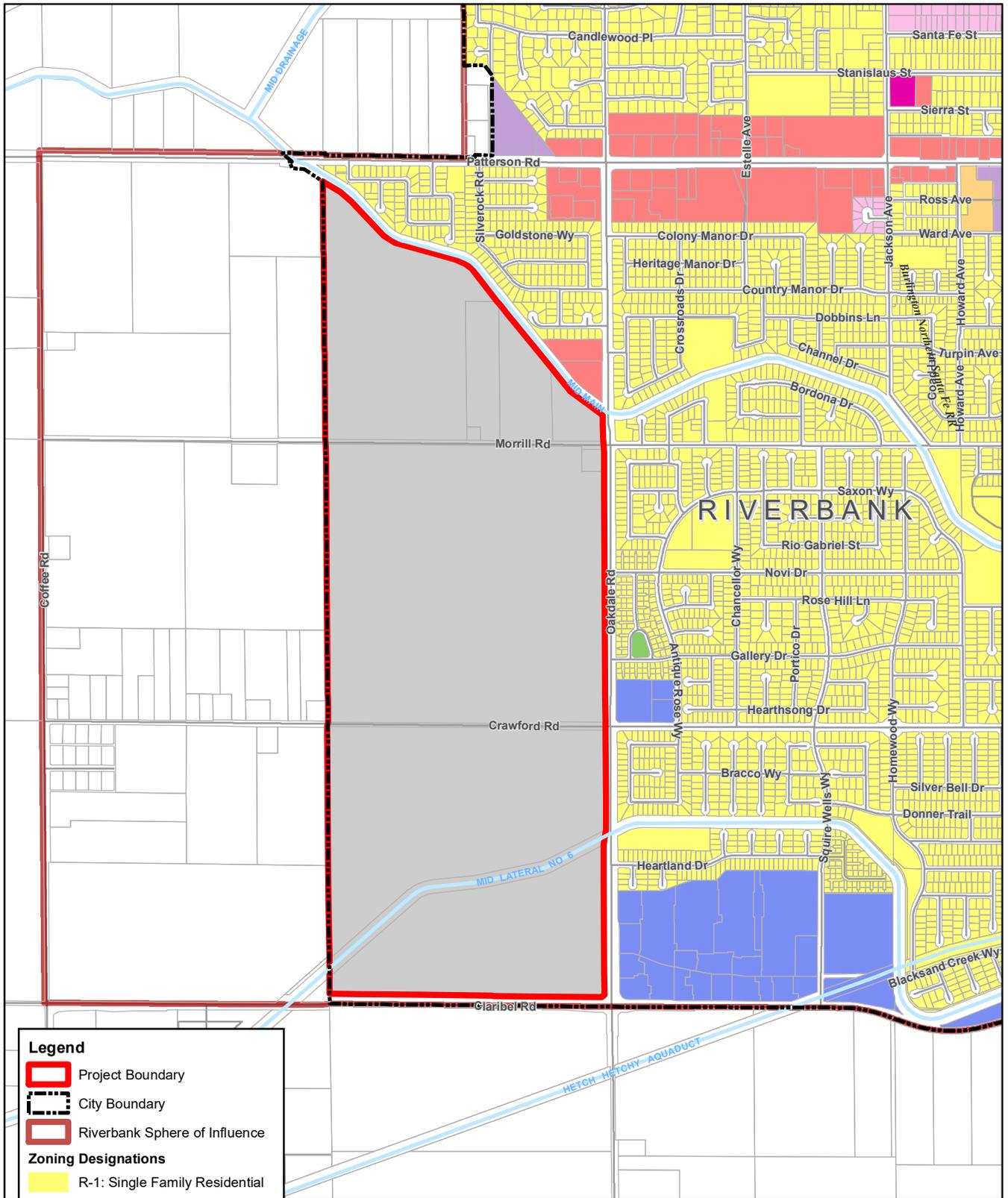
CROSSROADS WEST SPECIFIC PLAN

Figure 7a. Proposed General Plan Land Use Designations

City of Riverbank

Sources: Stanislaus County GIS. Map date: February 8, 2017.

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Legend

- Project Boundary
- City Boundary
- Riverbank Sphere of Influence

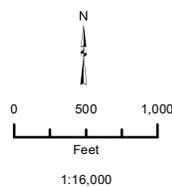
Zoning Designations

- R-1: Single Family Residential
- R-2: Duplex Residential
- R-3: Multi Family Residential
- C-1: Neighborhood Commercial
- C-2: General Commercial
- CM: Commercial-Industrial
- CX-1: Mixed Use
- Park
- SP: Specific Plan

CROSSROADS WEST SPECIFIC PLAN

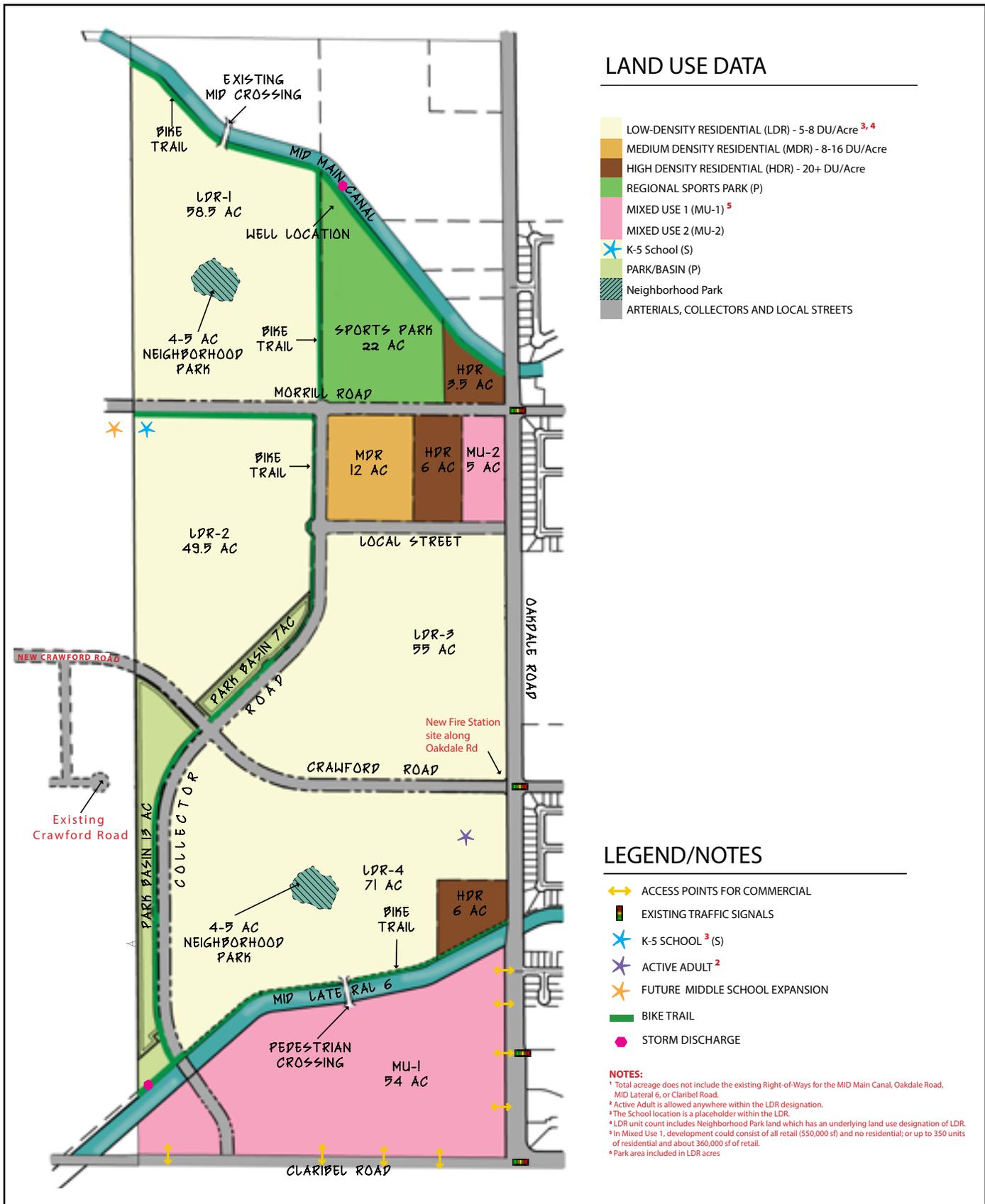
Figure 7b. Pre-zoning

City of Riverbank



Sources: Stanislaus County; City of Riverbank. Map date: February 8, 2017.

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LAND USE DATA

- LOW-DENSITY RESIDENTIAL (LDR) - 5-8 DU/Acre ^{3,4}
- MEDIUM DENSITY RESIDENTIAL (MDR) - 8-16 DU/Acre
- HIGH DENSITY RESIDENTIAL (HDR) - 20+ DU/Acre
- REGIONAL SPORTS PARK (P)
- MIXED USE 1 (MU-1) ⁵
- MIXED USE 2 (MU-2)
- K-5 School (S)
- PARK/BASIN (P)
- Neighborhood Park
- ARTERIALS, COLLECTORS AND LOCAL STREETS

LEGEND/NOTES

- ACCESS POINTS FOR COMMERCIAL
- EXISTING TRAFFIC SIGNALS
- K-5 SCHOOL ³ (S)
- ACTIVE ADULT ²
- FUTURE MIDDLE SCHOOL EXPANSION
- BIKE TRAIL
- STORM DISCHARGE

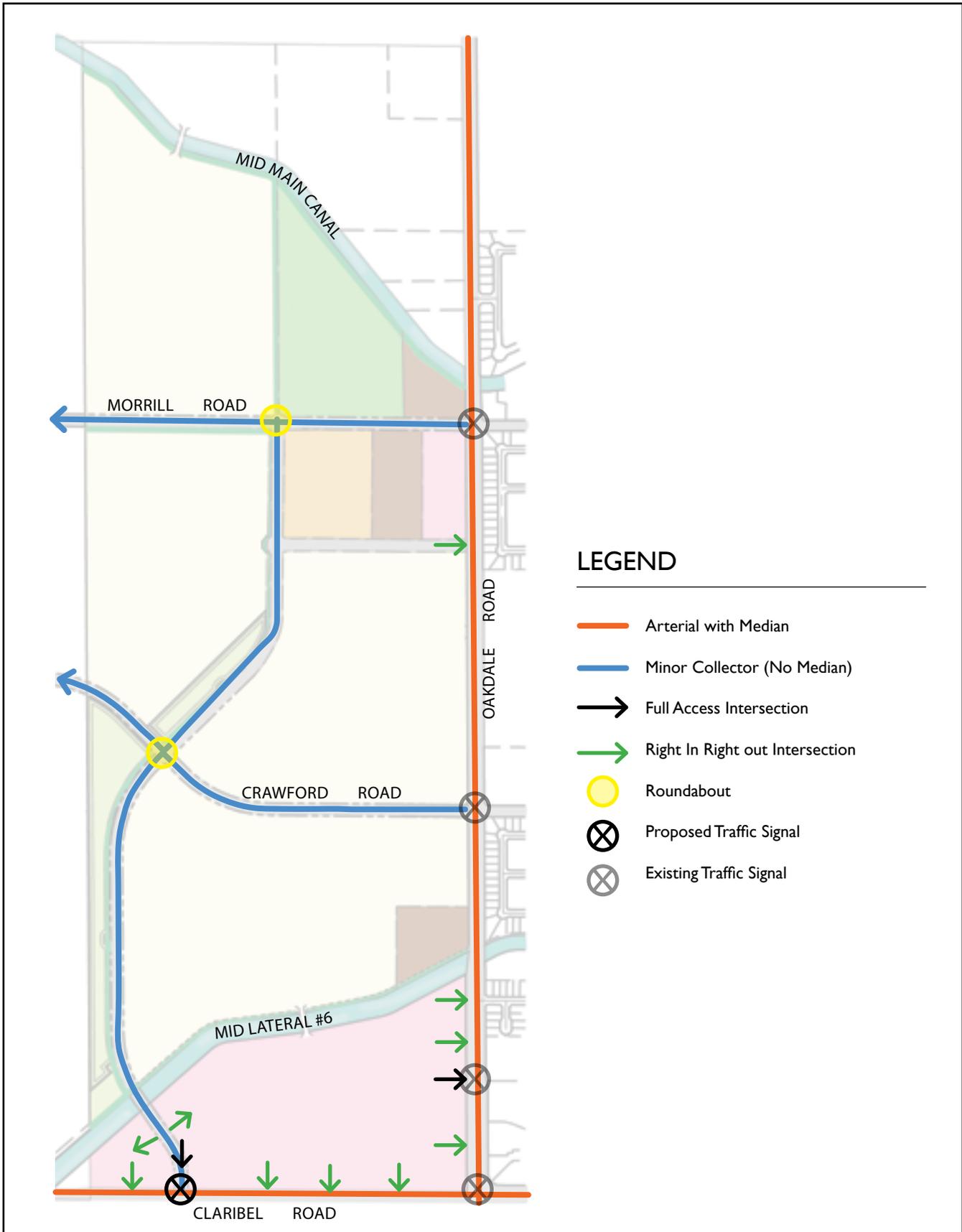
NOTES:
¹ Total acreage does not include the existing Right-of-Ways for the MID Main Canal, Oakdale Road, MID Lateral 6, or Claribel Road.
² Active Adult is allowed anywhere within the LDR designation.
³ The School location is a placeholder within the LDR.
⁴ LDR unit count includes Neighborhood Park land which has an underlying land use designation of LDR.
⁵ In Mixed Use 1, development could consist of all retail (550,000 sf) and no residential; or up to 350 units of residential and about 360,000 sf of retail.
⁶ Park area included in LDR acres



CROSSROADS WEST SPECIFIC PLAN
Figure 8. Conceptual Land Use Plan

Source: MVE, Inc. Map date: February 13, 2017.

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LEGEND

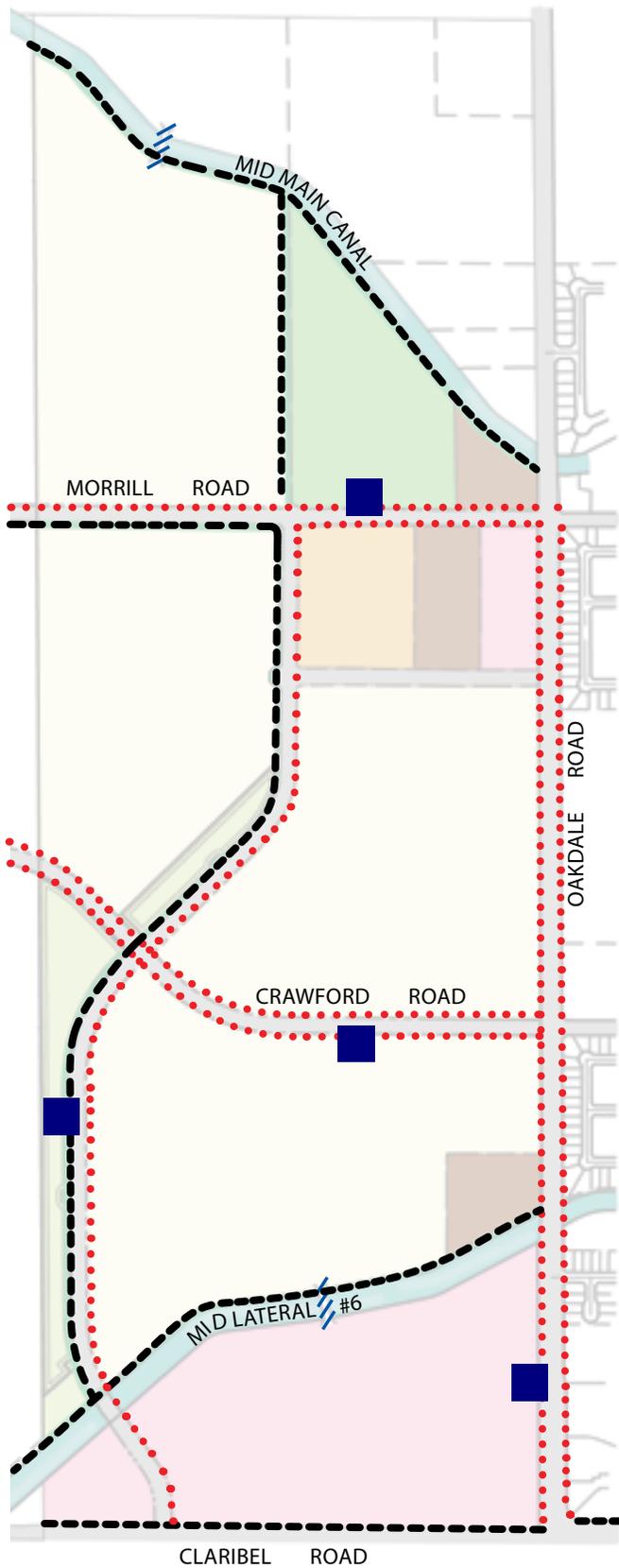
- Arterial with Median
- Minor Collector (No Median)
- Full Access Intersection
- Right In Right out Intersection
- Roundabout
- ⊗ Proposed Traffic Signal
- ⊗ Existing Traffic Signal



CROSSROADS WEST SPECIFIC PLAN
 Figure 9. Vehicular Circulation Map

Source: MVE, Inc. Map date: February 13, 2017.

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LEGEND

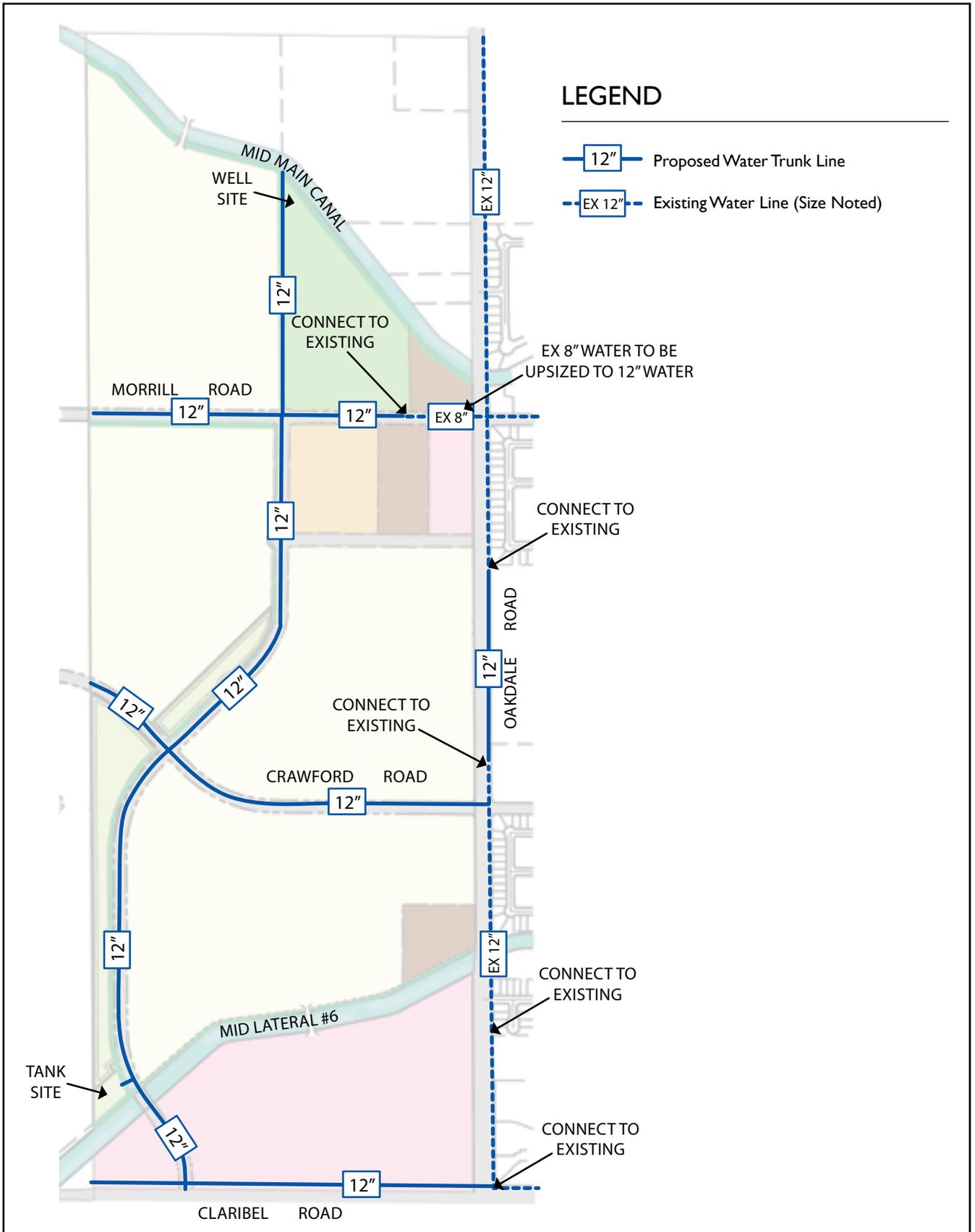
- Class I Bike Trails
- Class 2 Bike Lane
- //// Pedestrian Bridge Crossing
- Public Transit Locations



CROSSROADS WEST SPECIFIC PLAN

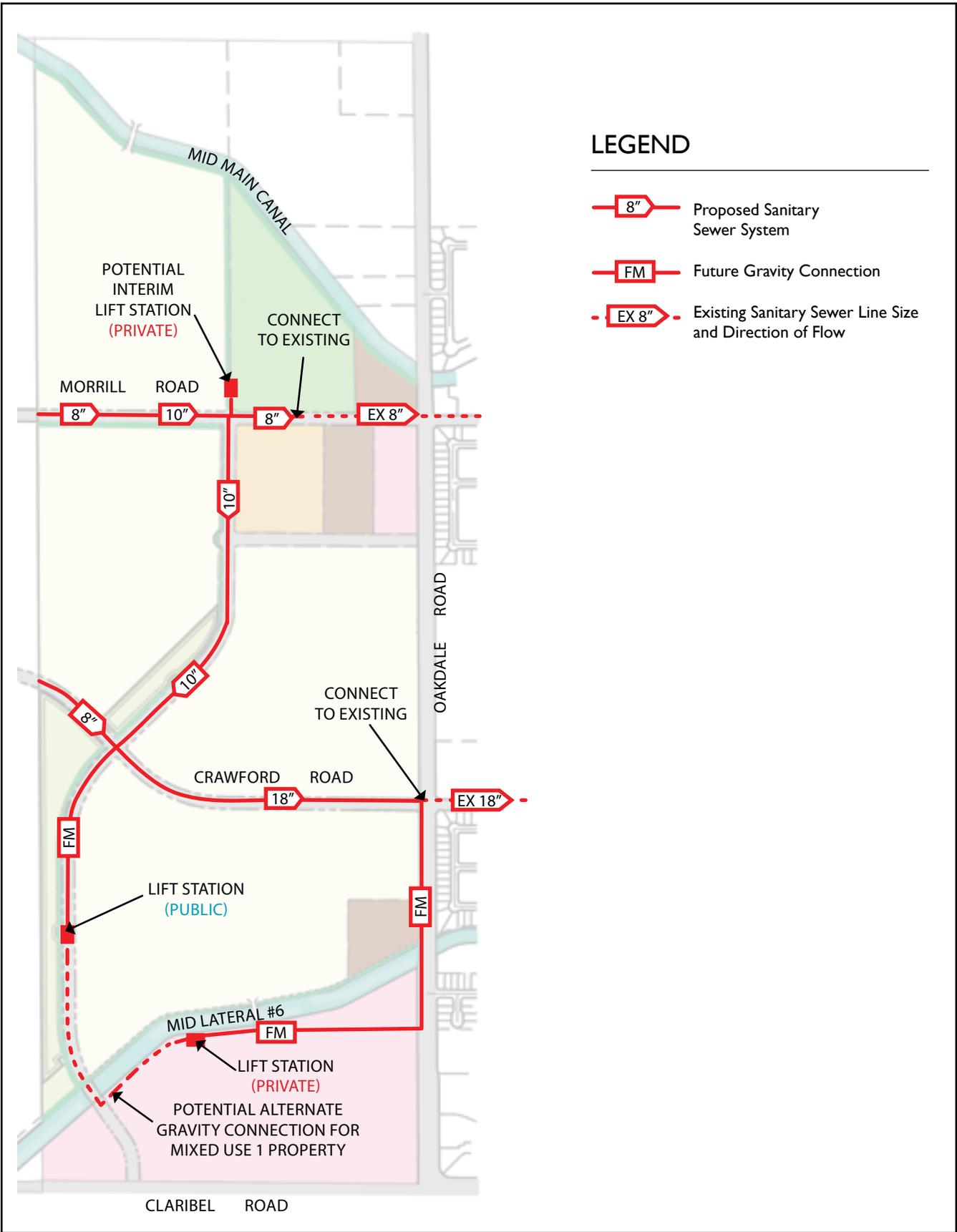
Figure 10. Alternative Transportation Circulation Map

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CROSSROADS WEST SPECIFIC PLAN
 Figure 11. Water System Map

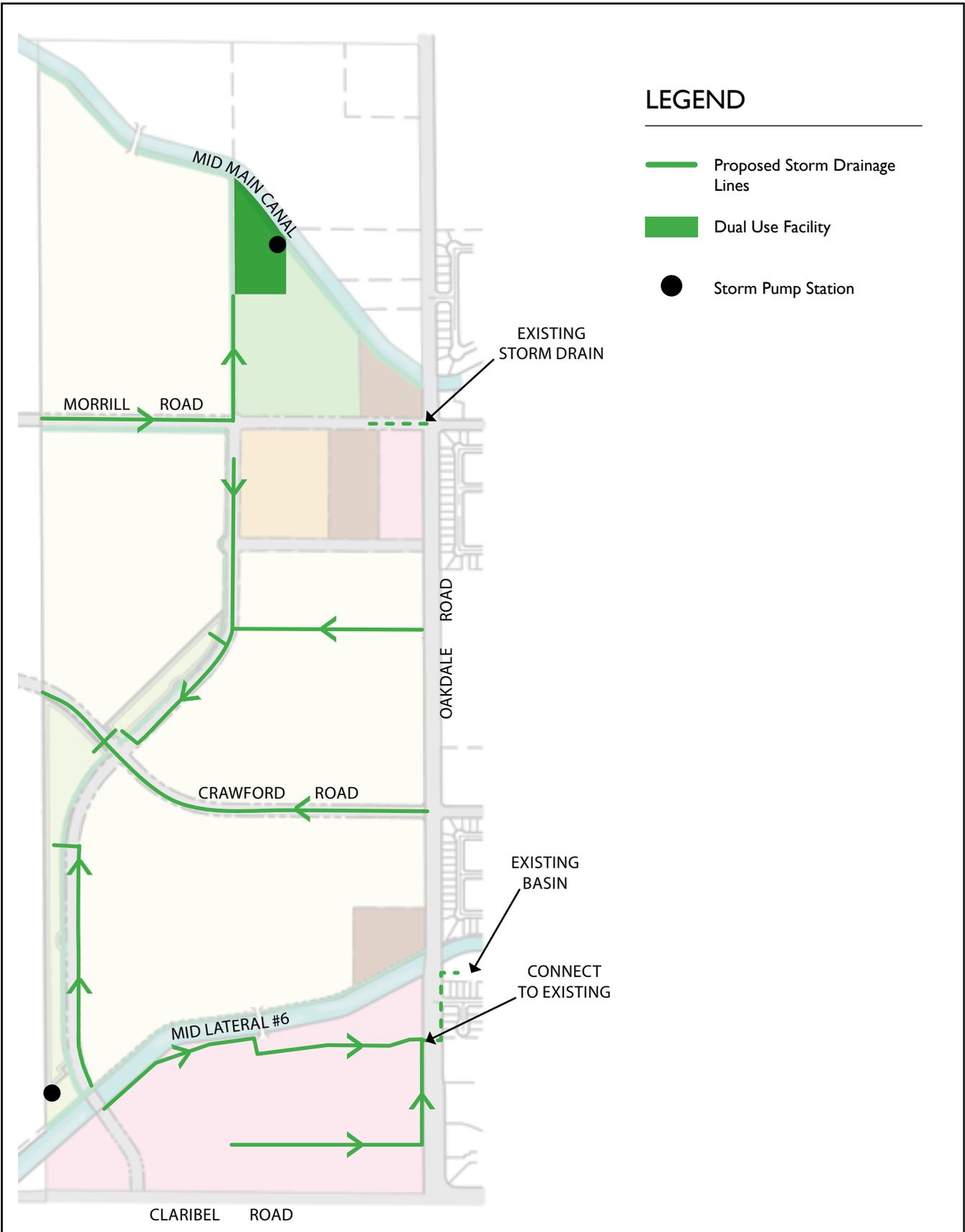
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CROSSROADS WEST SPECIFIC PLAN

Figure 12. Sanitary Sewer System Map

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LEGEND

- Proposed Storm Drainage Lines
- Dual Use Facility
- Storm Pump Station



CROSSROADS WEST SPECIFIC PLAN
 Figure 13. Storm Drain System Map

Source: MVE, Inc. Map date: February 13, 2017.

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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.

X	Aesthetics	X	Agriculture and Forest Resources	X	Air Quality
X	Biological Resources	X	Cultural Resources	X	Geology and Soils
X	Greenhouse Gasses	X	Hazards and Hazardous Materials	X	Hydrology and Water Quality
X	Land Use and Planning		Mineral Resources	X	Noise
X	Population and Housing	X	Public Services	X	Recreation
X	Transportation and Traffic	X	Tribal Cultural Resources	X	Utilities and Service Systems
X	Mandatory Findings of Significance				

DETERMINATION

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.
X	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

Date

EVALUATION INSTRUCTIONS

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, then 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).

- Reference 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 significance 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 significance

EVALUATION OF ENVIRONMENTAL IMPACTS

In each area of potential impact listed in this section, there are one or more questions which assess the degree of potential environmental effect. A response is provided to each question using one of the four impact evaluation criteria described below. A discussion of the response is also included.

- Potentially Significant Impact. This response is appropriate when there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries, upon completion of the Initial Study, an EIR is required.
- Less than Significant With Mitigation Incorporated. This response applies when 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.
- Less than Significant Impact. A less than significant impact is one which is deemed to have little or no adverse effect on the environment. Mitigation measures are, therefore, not necessary, although they may be recommended to further reduce a minor impact.
- No Impact. These issues were either identified as having no impact on the environment, or they are not relevant to the Project.

ENVIRONMENTAL CHECKLIST

This section of the Initial Study incorporates the most current Appendix "G" Environmental Checklist Form, contained in the CEQA Guidelines. Impact questions and responses are included in both tabular and narrative formats for each of the 18 environmental topic areas.

I. AESTHETICS-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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) Substantially degrade the existing visual character or quality of the site and its surroundings?	X			
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-d): It has been determined that the potential impacts on aesthetics caused by the proposed Project will require a more detailed analysis in the environmental impact report. As such, the lead agency will examine each of the four environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project will have a potentially significant impact on aesthetics. At this point, a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will provide a discussion of viewsheds, proximity to scenic roadways and scenic vistas, existing lighting standards, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts on aesthetics. This section of the environmental impact report will identify applicable General Plan policies that protect the visual values located along public roadways and surrounding land uses, and will also address the potential for the Project to substantially impair the visual character of the Project vicinity. The analysis will address any proposed design and landscaping plans developed by the applicant and provide a narrative description of the anticipated changes to the visual characteristics of the Plan Area because of Project implementation and the conversion of the existing on-site land uses. The analysis will also address potential impacts associated with light spillage onto adjacent properties during nighttime activities.

II. AGRICULTURE AND FOREST RESOURCES-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 1222(g)) or timberland (as defined in Public Resources Code section 4526)?				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			

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b), e): It has been determined that the potential impacts on agricultural resources caused by the proposed Project will require a more detailed analysis in the environmental impact report. As such, the lead agency will examine each of the four environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project will have a potentially significant impact on agriculture resources. At this point, a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will describe the character of the region’s agricultural lands, including maps of prime farmlands, other important farmland classifications, and protected farmland (including Williamson Act contracts). The County Agricultural Commissioner’s Office and the State Department of Conservation will be consulted and their respective plans, policies, laws, and regulations affecting agricultural lands will be presented within the analysis.

The environmental impact report will include thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to offset the loss of agricultural lands and Williamson Act cancellations as a result of Project implementation.

Responses c), d): There are no forest resources or zoning for forest lands located in the Plan Area. This CEQA topic is not relevant to the proposed Project and does not require further analysis.

III. AIR QUALITY-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with or obstruct implementation of the applicable air quality plan?	X			
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	X			
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	X			
d) Expose sensitive receptors to substantial pollutant concentrations?	X			
e) Create objectionable odors affecting a substantial number of people?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-e): Based on the current air quality conditions in the air basin it has been determined that the potential impacts on air quality caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the five environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on air quality. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include an air quality analysis that presents the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts on air quality. The Plan Area is located within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The air quality analysis will include the following:

- Regional air quality and local air quality near the Plan Area will be described. Meteorological conditions near the Plan Area that could affect air pollutant dispersal or transport will be described. Applicable air quality regulatory framework, standards, and significance thresholds will be discussed.
- Short-term (i.e., construction) increases in regional criteria air pollutants will be quantitatively assessed. The ARB-approved CalEEMod computer model will be used to

estimate regional mobile source and particulate matter emissions associated with the construction of the proposed Project.

- Long-term (operational) increases in regional criteria air pollutants will be quantitatively assessed for area source, mobile sources, and stationary sources. The ARB-approved CalEEMod computer model will be used to estimate emissions associated with the proposed Project. Exposure to odorous or toxic air contaminants will be assessed through a screening method as recommended by the SJVAPCD.
- Local mobile-source CO concentrations will be assessed through a CO screening method as recommended by the SJVAPCD.

IV. BIOLOGICAL RESOURCES-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 US Fish and Wildlife Service?	X			
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	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			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-f): Based on the documented special status species, sensitive natural communities, wetlands, and other biological resources in the region, it has been determined that the potential impacts on biological resources caused by the proposed Project will require a detailed analysis. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on biological resources. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will provide a summary of local biological resources, including descriptions and mapping of plant communities, the associated plant and wildlife

species, and sensitive biological resources known to occur, or with the potential to occur in the Project vicinity. The analysis will conclude with a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented in order to reduce impacts on biological resources and to ensure compliance with the federal and state regulations.

V. CULTURAL RESOURCES-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	X			
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	X			
d) Disturb any human remains, including those interred outside of formal cemeteries?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-d): Based on known historical and archaeological resources in the region, and the potential for undocumented underground cultural resources in the region, it has been determined that the potential impacts on cultural resources caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the four environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on cultural resources. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include an overview of the prehistory and history of the area, the potential for surface and subsurface cultural resources to be found in the area, the types of cultural resources that may be expected to be found, a review of existing regulations and policies that protect cultural resources, an impact analysis, and mitigation that should be implemented in order to reduce potential impacts to cultural resources. In addition, the CEQA process will include a request to the Native American Heritage Commission for a list of local Native American groups that should be contacted relative to this Project. The CEQA process will also include consultation with any Native American groups that have requested consultation with the City of Riverbank.

VI. GEOLOGY AND SOILS-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	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 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

RESPONSES TO CHECKLIST QUESTIONS

Responses a-d): It has been determined that the potential impacts from geology and soils will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact from geology and soils. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a review of existing geotechnical reports, published documents, aerial photos, geologic maps and other geological and geotechnical literature pertaining to the site and surrounding area to aid in evaluating geologic resources

and geologic hazards that may be present. The environmental impact report will include a description of the applicable regulatory setting, a description of the existing geologic and soils conditions on and around the Plan Area, an evaluation of geologic hazards, a description of the nature and general engineering characteristics of the subsurface conditions within the Plan Area, and the provision of findings and potential mitigation strategies to address any geotechnical concerns or potential hazards.

This section will provide an analysis including thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with geology and soils.

Response e): The proposed Project would connect to the municipal sewer system for wastewater disposal. Septic tanks or septic systems are not proposed as part of the Project. As such, this CEQA topic is not relevant to the proposed Project and does not require further analysis.

VII. GREENHOUSE GAS EMISSIONS -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 gasses?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a), b): Implementation of the proposed Project could generate greenhouse gases (GHGs) from a variety of sources, including but not limited to vehicle trips, vehicle idling, electricity consumption, water use, and solid waste generation. It has been determined that the potential impacts from greenhouse gas emissions by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact from greenhouse gas emissions. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a greenhouse gas emissions analysis pursuant to the requirements of Executive Order S-3-05 and The Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). The analysis will follow the California Air Pollution Control Officers Association (CAPCOA) white paper methodology and recommendations presented in Climate Change & CEQA, which was prepared in coordination with the California Air Resources Board and the Governor’s Office of Planning and Research as a common platform for public agencies to ensure that GHG emissions are appropriately considered and addressed under CEQA. This analysis will consider a regional approach toward determining whether GHG emissions are significant, and will present mitigation measures to reduce impacts. The discussion and analysis will include quantification of GHGs generated by the Project as well as a qualitative discussion of the Project’s consistency with any applicable state and local plans to reduce the impacts of climate change.

The environmental impact report will provide an analysis including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with greenhouse gas emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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 for people residing or working in the project area?	X			
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	X			
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	X			
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-h): It has been determined that the potential impacts from hazards and/or hazardous materials by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the seven environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact from hazards and/or hazardous materials. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a review of existing environmental site assessments and any other relevant studies for the Plan Area to obtain a historical record of environmental conditions. The analysis will also include a review of recent records and aerial photographs. A site reconnaissance will be performed to observe the site and potential areas of interest. Property owners/managers will be interviewed to gather information on the current and historical use of the properties, and the potential for Project implementation to introduce hazardous materials to and from the area during construction and operation. If environmental conditions are identified, mitigation measures, as applicable, will be identified to address the environmental conditions.

This section will provide an analysis including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with hazards and hazardous materials.

IX. HYDROLOGY AND WATER QUALITY-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Violate any water quality standards or waste discharge requirements?	X			
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	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, in a manner which would result in substantial erosion or siltation on- or off-site?	X			
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	X			
e) 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?	X			
f) Otherwise substantially degrade water quality?	X			
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	X			
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	X			
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	X			
j) Inundation by seiche, tsunami, or mudflow?			X	

RESPONSES TO CHECKLIST QUESTIONS

Responses a-i): Flood hazards can result from intense rain, snowmelt, cloudbursts, or a combination of the three, or from failure of a water impoundment structure, such as a dam. Floods from rainstorms generally occur between November and April and are characterized by high peak flows of moderate duration. Human activities have an effect on water quality when chemicals, heavy metals, hydrocarbons (auto emissions and car crank case oil), and other materials are transported with stormwater into drainage systems. Construction activities can increase sediment runoff, including concrete waste and other pollutants.

It has been determined that the potential impacts on hydrology and water quality caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the eight potentially significant environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on hydrology and water quality. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will present the existing FEMA flood zones, levee protection improvements, reclamation districts, and risk of flooding in the Plan Area and general vicinity.

The environmental impact report will summarize onsite hydrology and hydraulic calculations under existing and proposed conditions. Some of the specific items to be reviewed include: land use classification; acreage calculations; runoff coefficients; time of concentration; and methodology. Calculations will be reviewed for reasonableness and consistency with the site plan and with the City's master plans.

The environmental impact report will evaluate the potential construction and operational impacts of the proposed Project on water quality. This section will describe the surface drainage patterns of the Plan Area and adjoining areas, and identify surface water quality in the Plan Area based on existing and available data. This section will identify 303(d) listed impaired water bodies near the Plan Area. Conformity of the proposed Project to water quality regulations will also be discussed. Mitigation measures will be developed to incorporate Best Management Practices (BMPs), consistent with the requirements of the Central Valley Regional Water Quality Control Board (CVRWQCB) to reduce the potential for site runoff.

This section will provide an analysis including the methodology, thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with hydrology and water quality.

Response j): There are no significant bodies of water near the Plan Area that could be subject to a seiche or tsunami. Additionally, the Plan Area and the surrounding areas are essentially flat, which precludes the possibility of mudflows occurring in the Plan Area. This is a *less than significant* impact, and no additional analysis of this CEQA topic is warranted.

X. LAND USE AND PLANNING-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Physically divide an established community?	X			
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	X			
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	X			

RESPONSES TO CHECKLIST QUESTIONS

Response a-c): It has been determined that the potential land use and planning impacts caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of these environmental issues in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a detailed discussion of the Project entitlements, including Annexation, Pre-zoning, General Plan Amendments, and Development Agreements as it relates to the existing General Plan, Zoning Code, and other local regulations. The local, regional, state, and federal jurisdictions potentially affected by the Project will be identified, as well as their respective plans, policies, laws, and regulations, and potentially sensitive land uses. The proposed Project will be evaluated for consistency the City of Riverbank General Plan, the Zoning Ordinance, and other local planning documents. Planned development and land use trends in the region will be identified based on currently available plans. Reasonably foreseeable future development projects within the region will be noted, and the potential land use impacts associated with the Project will be presented.

This section will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to ensure consistency with the existing and planned land uses.

XI. MINERAL RESOURCES-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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

RESPONSES TO CHECKLIST QUESTIONS

Response a), b): There are no significant deposits of mineral resources located in the Plan Area, as delineated by the Mineral Resources and Mineral Hazards Mapping Program (MRMHMP). The Plan Area is not designated as a Mineral Resource Zone (MRZ). This CEQA topic is not relevant to the proposed Project and does not require further analysis.

XII. NOISE -- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	X			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	X			
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	X			
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	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 expose people residing or working in the project area to excessive noise levels?	X			
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-f): Based on existing and projected noise levels along roadways and adjacent rail lines, and the potential for noise generated during Project construction and operational activities, it has been determined that the potential impacts from noise caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of the six five potentially significant environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact from noise. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a noise study. The noise study will identify the noise level standards contained in the Stanislaus County and City of Riverbank General Plan Noise Elements which are applicable to this Project, as well as any germane, state and federal standards. Continuous (24-hour) and short-term noise measurements will be performed in the Plan Area and in the Project vicinity to quantify existing ambient noise levels from existing noise sources, including Plan Area roadways. The noise study will provide an estimate of existing traffic noise levels adjacent to the Project-area roadways through application of

accepted traffic noise prediction methodologies. Any significant noise sources other than local traffic within the Plan Area will be identified and quantified through noise level measurements. The noise study will identify all significant noise impacts due to and upon development of the proposed Project. The noise study will determine the land use compatibility of proposed commercial uses as it may affect existing noise sensitive receptors in the Plan Area. An assessment of construction noise impacts and potential mitigation measures will also be provided. The study will present appropriate and practical recommendations for noise control aimed at reducing any noise impacts.

The environmental impact report will include thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with noise.

XIII. POPULATION AND HOUSING-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Induce substantial 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 housing, necessitating the construction of replacement housing elsewhere?	X			
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	X			

RESPONSES TO CHECKLIST QUESTIONS

Response a-c): It has been determined that the potential population and housing impacts caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of these environmental issues in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include a detailed discussion of the Project characteristics, including Annexation, Pre-zoning, General Plan Amendments, Development Agreements, and housing proposed by the Project as it relates to the existing General Plan Housing Element, and other local regulations. The local, regional, state, and federal jurisdictions potentially affected by the Project will be identified, as well as their respective plans, policies, laws, and regulations, and potentially sensitive land uses. The proposed Project will be evaluated for consistency the City of Riverbank General Plan, the Zoning Ordinance, and other local planning documents. Planned development and housing and population trends in the region will be identified based on currently available plans.

This section will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to ensure population and housing consistency with the existing and planned land uses.

XIV. PUBLIC SERVICES-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	X			
ii) Police protection?	X			
iii) Schools?	X			
iv) Parks?	X			
v) Other public facilities?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a) i- v: Implementation of the proposed Project would result in increased demand for police, fire protection, schools, parks, and other public facilities in the area. It has been determined that the potential impacts from increased demands on public services caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of these five environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on public services. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

During the preparation of the environmental impact report, the public service providers will be consulted to determine existing service levels in the Plan Area. This would include documentation regarding existing staff levels, equipment and facilities, current service capacity, existing service boundaries, and planned service expansions. Master plans from such public service providers and City policies, programs, and standards associated with the provision of public services will be presented in the environmental impact report.

The environmental impact report will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented reduce impacts associated with public services.

XV. RECREATION-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	X			
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	X			

RESPONSES TO CHECKLIST QUESTIONS

Response a), b): Implementation of the proposed Project would result in increased demand for parks, and other recreational facilities in the area. It has been determined that the potential impacts from increased demands to recreation facilities caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine each of these environmental issues listed in the checklist above in the environmental impact report, and will decide whether the proposed Project has the potential to have a significant impact on recreational facilities. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered ***potentially significant*** until a detailed analysis is prepared in the environmental impact report.

During the preparation of the environmental impact report, the recreational facilities and services will be analyzed to determine existing service levels in the Plan Area. This would include documentation of existing and future facility needs, current service capacity, and planned service expansions. City policies, programs, and standards associated with the provision of public services will be presented in the environmental impact report.

The environmental impact report will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented reduce impacts associated with public services.

XVI. TRANSPORTATION AND TRAFFIC-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	X			
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	X			
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	X			
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	X			
e) Result in inadequate emergency access?	X			
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-f): The proposed Project includes the development of uses that will increase traffic on existing and planned roadways. The circulation design includes roadway improvements intended to accommodate traffic patterns in the area. Based on existing and projected traffic volume levels along roadways, it has been determined that the potential traffic impacts caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the EIR will examine each of the seven environmental issues listed in the checklist above in the EIR and will determine whether the proposed Project has the potential to have a significant impact from traffic. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is conducted in the EIR.

The environmental impact report will describe existing and future traffic conditions and will identify the trips generation, trip distribution, and vehicle miles traveled. The EIR will analyze

traffic impacts associated with the Project under existing and cumulative conditions. Potential impacts associated with site access, and on-site circulation will also be addressed in the EIR.

The potential transportation impacts will be analyzed using the Synchro traffic operations software, which is based on the Highway Capacity Manual. The traffic analysis will include an Existing Plus Project condition and a Cumulative Plus Project condition. Impacts to the bicycle, pedestrian, rail, and transit facilities and services will be also evaluated. Significant impacts will be identified in accordance with the established criteria. Mitigation measures will be identified to lessen the significance of impacts where feasible.

The environmental impact report will provide an analysis including the thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented reduce impacts associated with transportation/traffic.

XVII. TRIBAL CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) 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)?	X			
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resources to a California Native American tribe.	X			

Responses to Checklist Questions

Responses a-b): Based on known historical, cultural, tribal, and archaeological resources in the region, and the potential for undocumented underground cultural resources in the region, it has been determined that the potential impacts on tribal cultural resources caused by the proposed Project will require a detailed analysis in the environmental impact report. As such, the lead agency will examine the two environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on tribal cultural resources. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered **potentially significant** until a detailed analysis is prepared in the environmental impact report.

The environmental impact report will include an overview of the prehistory and history of the area, the potential for surface and subsurface tribal cultural resources to be found in the area, the types of tribal cultural resources that may be expected to be found, a review of existing regulations and policies that protect tribal cultural resources, an impact analysis, and mitigation that should be implemented in order to reduce potential impacts to tribal cultural resources. In addition, the CEQA process will include a request to the Native American Heritage Commission for a list of local Native American groups that should be contacted relative to this Project. The CEQA process will also include consultation with any Native American groups that have requested consultation with the City of Riverbank.

XVIII. UTILITIES AND SERVICE SYSTEMS-- WOULD THE PROJECT:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	X			
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	X			
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	X			
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects projected demand in addition to the providers existing commitments?	X			
f) Be served by a landfill with sufficient permitted capacity to accommodate the projects solid waste disposal needs?	X			
g) Comply with federal, state, and local statutes and regulations related to solid waste?	X			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-g): Implementation of the proposed Project would result in increased demands for utilities to serve the Project. As such, the EIR will examine each of the seven environmental issues listed in the checklist above in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact to utilities and service systems. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the EIR.

The environmental impact report will analyze wastewater, water, and storm drainage infrastructure, as well as other utilities (i.e. solid waste, gas, electric, etc.), that are needed to serve the proposed Project. The wastewater assessment will include a discussion of the proposed collection and conveyance system, treatment methods and capacity at the treatment plants, disposal location(s) and methods, and the potential for recycled water use for irrigation. The environmental impact report will analyze the impacts associated with on-site construction

of the conveyance system, including temporary impacts associated with the construction phase. The proposed infrastructure will be presented. The analysis will discuss the disposal methods and location, including environmental impacts and permit requirements associated with disposal of treated wastewater.

The storm drainage assessment will include a discussion of the proposed drainage collection system including impacts associated with on-site construction of the storm drainage system. The environmental impact report will identify permit requirements and mitigation needed to minimize and/or avoid impacts. The proposed infrastructure will be presented.

The environmental impact report will analyze the impacts associated with on-site and off-site construction of the water system, including temporary impacts associated with the construction phase. The environmental impact report will also identify permit requirements and mitigation needed to minimize and/or avoid impacts, and will present the proposed infrastructure as provided by the Plan Area engineering reports.

The environmental impact report will also address solid waste collection and disposal services for the proposed Project. This will include an assessment of the existing capacity and Project demands. The assessment will identify whether there is sufficient capacity to meet the Project demands.

The environmental impact report will provide thresholds of significance, a consistency analysis, cumulative impact analysis, and a discussion of feasible mitigation measures that should be implemented to reduce impacts associated with utilities and service systems.

XVIV. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of 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			

RESPONSES TO CHECKLIST QUESTIONS

Responses a-c): It has been determined that the potential for the proposed Project to: degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of a rare or endangered plant or animal; eliminate important examples of the major periods of California history or prehistory; create cumulatively considerable impacts; or adversely affect human beings will require more detailed analysis in an environmental impact report. As such, the EIR will examine each of these environmental issues in the environmental impact report and will decide whether the proposed Project has the potential to have a significant impact on these environmental issues. At this point a definitive impact conclusion for each of these environmental topics will not be made, rather all are considered *potentially significant* until a detailed analysis is prepared in the EIR.

REPORT PREPARERS

This document was prepared by De Novo Planning Group, Inc. of El Dorado Hills under the direction of the City of Riverbank. De Novo Planning Group staff participating in document preparation included the following:

- Steve McMurtry, Principal Planner
- Elise Carroll, Associate Planner

REFERENCES

California Department of Conservation Division of Mines and Geology. AB 3098 List – January 2017. Available at:

<http://www.conservation.ca.gov/dmr/SMARA%20Mines/ab_3098_list/Documents/January_2017-3098.pdf>.

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City of Riverbank. City of Riverbank General Plan 2005-2025. Adopted April 22, 2009.

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Stanislaus County. Stanislaus County General Plan 2015. Adopted August 23, 2016.

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CROSSROADS WEST SPECIFIC PLAN PROJECT

SCOPING MEETING NOTES

WEDNESDAY, APRIL 12, 2017 - 5:30 PM

The Scoping Meeting began with an introduction by John B. Anderson, contract planner with the City of Riverbank. The introduction included a brief history of the planning efforts associated with the proposed Crossroads West Specific Plan (CWSP) Project and project site, including past land use and planning efforts related to the site, and previous expansion of the City's Sphere of Influence (SOI) to include the site.

Steve McMurtry, Principal with De Novo Planning Group, gave a PowerPoint presentation that summarized the following: the purpose of the Scoping Meeting; the environmental review process; the project location, City and County land use and designations, and project characteristics and entitlements; the issues to be addressed in the Environmental Impact Report (EIR); the methods which the public can provide comments regarding the scope of the EIR; the next steps in the process, pursuant to the California Environmental Quality Act (CEQA); and the tentative schedule for the EIR.

Following the PowerPoint presentation, John B. Anderson provided the public with additional detail regarding the proposed entitlements, project features, and circulation. Members of the public were then prompted to provide any questions and/or comments regarding the project and the scope of the Draft EIR.

Some members of the public asked general questions regarding the proposed re-alignment of Crawford Road, including the timing of the construction and the specific location of the alignment. Many of these questions focused on the portion of Crawford Road located off-site and west of the CWSP project site. One commenter suggested gating off Crawford Road in order to prohibit through access, which could still be used for emergency vehicle access.

One member of the public voiced concerns regarding the proposed circulation plan. Another commenter generally questioned whether the project would result in agricultural irrigation impacts. Some members of the public also voiced concerns regarding interim circulation impacts that may occur off-site during the construction period. These concerns included the movement of construction vehicles and large trucks on Crawford Road, as well as the timing of roadway improvements on Crawford Road.

Additionally, one member of the public asked whether the EIR would address potential conflicts between existing agricultural uses and the proposed urban uses. This question was followed up with a question from a different commenter about the edge treatment (i.e., fencing) along the western project boundary. Another commenter who stated that she lived near one of the proposed linear park/detention areas questioned what, if any, fencing would be located near her property.



Some members of the public requested larger scale maps and plans for the project. Donna Kenney, Planning and Building Manager for the City of Riverbank, photocopied and brought back copies of the proposed land use plan to the meeting for immediate distribution.

Further, one commenter stated that traffic issues resulting from previous developments in the City have not been resolved. Another commenter then questioned whether the project included improvements to Morrill Road. A different member of the public suggested an emergency vehicle access gate be located at the end of Crawford Road, west of the project site. The same member of the public also disliked the proposed re-alignment of Crawford Road.

A representative of the Sylvan Union School District noted that the District had recently submitted an NOP comment letter regarding the project. She stated that the proposed location of the elementary school site was not favored by the District. This was largely due to the fact that the District prefers more centrally-located sites in order to reduce the reliance on bus transportation and promote walkability. She also stated that this comment letter included a map of the project site with three preferred locations for the proposed elementary school site.

Some members of the public generally questioned when groundbreaking for the project would occur. Another member noted that the City still has much potential for infill development east of the project site, and that these areas should be priorities for growth.

One commenter asked whether hazardous materials would be analyzed and whether remediation would be required.

Once the public was finished commenting and asking questions regarding the project, the meeting was adjourned.

Elise Carroll

From: John Anderson <john@jbandersonplanning.com>
Sent: Monday, April 17, 2017 8:42 AM
To: 'Al Dadesho'
Cc: Donna M. Kenney; Steve McMurtry; 'Elise Carroll'
Subject: RE: Crossroads west

Al:

I received your message will be responding shortly.

JBA

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

Ripon, CA 95366

PH: (209) 599-8377

Fax: (209) 599-8399

From: Al Dadesho [mailto:al@t3direct.com]
Sent: Thursday, April 13, 2017 2:02 PM
To: john@jbandersonplanning.com
Subject: Crossroads west

John,

I am the owner of property at 2173 Morrill Road, Modesto/Riverbank. This is a 4.76 acre parcel at corner of Morrill Road and Oakdale Road adjacent to the sport complex.

I talked to you briefly after the meeting last night.

My question is:

What is the process of splitting my property with one 3 acre parcel along the east side of property adjacent to sport complex? And keep remaining 2.76 acres with our current residence?

I am ok with the high density designations for the property, but we may elect to stay and not move. This would make it where we could sell the 3 acre parcel and stay in our home of approx. 25 years.

Please let me know

Albert Dadesho

President

Toll Free: 866.731.7717 x 101 | Direct Line: 209.593.1121 | Fax: 209.551.2383

4660 Spyres Way Bldg 1 | Modesto, CA 95356

www.t3direct.com



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File No. 38075.00001

April 21, 2017

VIA E-MAIL AND U.S. MAIL

John B. Anderson, Project Planner
City of Riverbank, Development Services Department
6707 3rd Street, South Hall
Riverbank, CA 95367
john@jbandersonplanning.com

Re: March 2017 Notice of Preparation and Initial Study for the Crossroads
West Specific Plan

Dear Mr. Anderson:

Our client, the Stanislaus Consolidated Fire Protection District (Fire District), is in receipt of the Notice of Preparation (NOP) and Initial Study for the Crossroads West Specific Plan (CRWSP or Project) in the City of Riverbank (City). The Fire District values the opportunity to comment on the proposed Project to ensure that the Fire District continues to meet the service delivery needs of the Riverbank community. To that end, the Fire District Board of Directors established an ad hoc committee to work with the City during this Project and provide a detailed and thorough review of all Project-related documents. The Fire District was hopeful that it could have more time to submit comments on the NOP, but the City unfortunately denied a short seven day extension requested by the District. Based on the Fire District's commitment to providing fire protection services, we hereby submit our comments on the NOP regarding the scope and contents of the Environmental Impact Report (EIR), including the topics for which the Fire District believe analysis is required to ensure the EIR adequately ascertains, discloses, and feasibly mitigates, the potential environmental impacts of the Project.

The CRWSP NOP and Initial Study, in accordance with the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.* (CEQA); California Code of Regs., Title 14, § 15000 *et seq.* (State CEQA Guidelines)), discloses that the potential impacts from increased demands on fire protection services caused by the proposed Project will require a detailed analysis in the EIR. As such, and in accordance with Public Resources Code section 21080.4(a) and State CEQA Guidelines section 15082(b), the Fire District has compiled the following list of critical concerns that it requests be addressed in the scope and content of the CRWSP EIR. It is essential that these concerns are adequately addressed in the EIR to ensure that the level of fire protection services being provided by the Fire District to already-established areas of the community are not compromised by the Project.



BEST BEST & KRIEGER
ATTORNEYS AT LAW

John B. Anderson, Project Planner
April 21, 2017
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- Per City General Plan Policy PUBLIC-7.1, the EIR must confirm that the Project will have adequate fire flow pressure in relation to structure size, design, requirements for construction, and/or built-in fire protection systems. Absent that, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- Per City General Plan Policy PUBLIC-7.2, the EIR must confirm that that the Project infrastructure can ensure a minimum fire flow pressure of 1,500 GPM (sustainable for at least two hours) for residential use and a minimum fire flow pressure of 3,600 GPM (sustainable for longer periods) for larger residences and other building types, depending on the particular use and structure characteristics. Absent that, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- Per City General Plan Policy PUBLIC-7.3, the EIR must confirm that the Project will include a location for a new fire station to ensure the appropriate level of service (including adequate response time per Policy PUBLIC-7.5), community compatibility, and efficiency. The NOP states that a one-acre parcel has been designated for the proposed fire station at the corner of Crawford and Oakdale Road. However, the Fire District preliminarily estimates that a minimum 1.25-acre site may be needed to meet the District's needs. Similar projects we have evaluated have provided a site capable of encompassing 20 parking stalls, 4,000 square feet of administrative office space, and a 6,000 square foot fire station. The Fire District believes a further assessment by the City regarding the necessary lot size to accommodate the functions of the proposed fire station is required. Absent the Project's provision of an adequately sized site for a new fire station, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- As required by City General Plan Policy PUBLIC-7.5, the EIR should include the results of a response survey to verify that the proposed location of the new fire station will meet response times within the established limits. If the survey shows that the proposed location will not meet response times within the established limits the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- The EIR should include the results of a staffing survey to identify the impacts to the existing staffing levels and proposed staffing needs in the CRWSP area, and per City General Plan Policy PUBLIC-7.4, include substantial evidence reflecting coordination with fire protection providers, including through reciprocity



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John B. Anderson, Project Planner
April 21, 2017
Page 3

arrangements, to ensure equipment, staffing, and facilities for emergency medical services, urban search and rescue, hazardous materials emergency response, and other relevant needs. Absent this, the EIR must require all feasible mitigation necessary to reduce the impact of insufficient staffing to a less than significant level.

- Per City General Plan Policy PUBLIC-7.5, the EIR should include a traffic analysis supported by substantial evidence that includes a determination as to whether the controlled ingress and egress at the proposed fire station location will assist in meeting the response times stated in City General Plan Policy PUBLIC-7.5. Also, per City General Plan Policy PUBLIC-7.5, the EIR must confirm that the emergency response system is capable of achieving the following standards in 95% of all cases: first fire emergency response unit within six minutes of dispatch; full alarm assignment within 10 minutes of dispatch; and second alarm assignment within 15 minutes of dispatch. Absent this, the EIR must require all feasible mitigation necessary to ensure that, with operation of the Project, adequate response times can be met.
- The EIR should include an assessment of current and proposed capital fee structures needed to effectively support the construction of a new fire station and equipment needs for the CRWSP area. Absent such information, the EIR must require all feasible mitigation necessary to ensure that a new fire station and the equipment needs of the CRWSP area can be funded.
- The EIR should include confirmation, supported by substantial evidence, that water supplies for fire protection will meet or exceed the requirements established in the City's General Plan, City standards, and applicable building and fire codes. Absent such information, the EIR must require all feasible mitigation necessary to ensure that adequate water supplies will be provided.
- The EIR should include confirmation, supported by substantial evidence, that all proposed structures within the CRWSP area will be constructed to meet all applicable building and fire codes.
- The EIR should include confirmation, supported by substantial evidence, that that Project roadways will meet or exceed the requirements for fire apparatus access based on the City's standards and applicable building and fire codes.

Additionally, to assist in identifying potential mitigation measures, the Fire District has initiated negotiations with financial and planning consultants to develop the requested Fire



BEST BEST & KRIEGER
ATTORNEYS AT LAW

John B. Anderson, Project Planner

April 21, 2017

Page 4

District Master Plan and establishment of a new capital fee structure for the CRWSP area, both of which are referenced in the NOP.

As previously stated in the Fire District's July 25, 2016 letter to City Manager Jill Anderson, the Fire District remains committed to collaborating and working cooperatively with the City on the future development of the CRWSP area. To ensure this is a deliberative process, the Fire District will extend an invitation to City Administration to attend the next Crossroads West Ad Hoc Committee meeting.

The Fire District is committed to providing the highest level of fire protection services to the citizens of the City. In this letter, we have attempted to focus primarily on the areas of analysis that we believe will be necessary to ensure an EIR that discloses and evaluates the full range of potential impacts to fire protection services. We do, however, reserve the right to raise other concerns as the EIR is developed. We appreciate your consideration of the Fire District's comments on the NOP and Initial Study, and we look forward to your responses to the comments and to engaging in review of the Draft EIR when it is prepared.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Diaz', with a long horizontal flourish extending to the right.

Christopher J. Diaz
for BEST BEST & KRIEGER LLP

cc: Stanislaus Consolidated Fire Protection District Board of Directors

Elise Carroll

From: John Anderson <john@jbandersonplanning.com>
Sent: Monday, April 17, 2017 1:54 PM
To: Steve McMurtry; 'Elise Carroll'
Cc: Donna M. Kenney
Subject: FW: Riverbank-Crossroads West Specific Plan

FYI

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

Ripon, CA 95366

PH: (209) 599-8377

Fax: (209) 599-8399

From: Fuentes, Eduardo@DOT [mailto:eduardo.fuentes@dot.ca.gov]
Sent: Monday, April 17, 2017 1:29 PM
To: john@jbandersonplanning.com
Subject: Riverbank-Crossroads West Specific Plan

Hello, see comments below:

Page 86 Transportation and Traffic of NOP states that a detailed analysis to determine the traffic impacts will be done in the EIR stage since the increase in traffic will create a potentially significant impact. Please provide a Traffic Impact Analysis, which analyzes intersections on SR 108 being impacted by project traffic, in order to determine proper impacts and required mitigation(s) to SR 108.

Please let me know if you have any questions.

Thank You,

Eduardo Fuentes
Metropolitan Planning
Caltrans District-10
209-948-7783

Elise Carroll

From: John Anderson <john@jbandersonplanning.com>
Sent: Wednesday, May 10, 2017 10:23 AM
To: 'Fuentes, Eduardo@DOT'
Cc: 'Pheng, Sinaren@DOT'; 'Dumas, Thomas A@DOT'; 'Zarzuela, Homer B@DOT'; machadom@stancounty.com; Donna M. Kenney; Kenneth D. Anderson P. E. #13; Steve McMurtry; 'Elise Carroll'
Subject: RE: CRWSP - Traffic Analysis - City of Riverbank

Perfect.....thanks so much for the reply.

JBA

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

Ripon, CA 95366

PH: (209) 599-8377

Fax: (209) 599-8399

From: Fuentes, Eduardo@DOT [mailto:eduardo.fuentes@dot.ca.gov]
Sent: Wednesday, May 10, 2017 10:03 AM
To: John Anderson
Cc: Pheng, Sinaren@DOT; Dumas, Thomas A@DOT; Zarzuela, Homer B@DOT; machadom@stancounty.com
Subject: RE: CRWSP - Traffic Analysis - City of Riverbank

Hello John,

We (Caltrans) believe the intersections of greatest concern are the ones highlighted in green as shown.

1. SR 108 / Coffee Road
2. SR 108 / Oakdale Road
3. Morrill Road / Coffee Road
4. Morrill Road / Oakdale Road
5. Crawford Road / Coffee Road
6. Crawford Road / Oakdale Road
7. Claribel Road / McHenry Avenue
8. Claribel Road / Coffee Road
9. Claribel Road / Oakdale Road
10. Claribel Road / Squire Wells Way
11. Claribel Road / Roselle Avenue
12. Claribel Road / Terminal Avenue
13. Claratina Road / Oakdale Road
14. Oakdale Road / Crossroads SC's North Access
15. Claus at Claribel
16. Roselle at Sylvan
17. Oakdale at Sylvan
18. Coffee at Claratina

Thank You,
Eduardo

From: John Anderson [<mailto:john@jbandersonplanning.com>]

Sent: Thursday, April 27, 2017 4:17 PM

To: Patrick Kelly <pkelly@modestogov.com>; Cynthia Birdsill <cbirdsill@modestogov.com>; Fuentes, Eduardo@DOT <eduardo.fuentes@dot.ca.gov>; Matt Machado <machadom@co.stanislaus.ca.us>; cavanahp@stancounty.com

Cc: Donna M. Kenney <dkenney@riverbank.org>; Steve McMurtry <smcmurtry@denovoplanning.com>; Kenneth D. Anderson P. E. #13 <kanderson@kdanderson.com>; Kathleen Cleek <kcleek@riverbank.org>; William Kull <wkull@gkengineers.com>

Subject: CRWSP - Traffic Analysis - City of Riverbank

Importance: High

As you are aware I have been retained by the City of Riverbank to work on the Crossroads West development and will be managing the consulting team preparing the environmental evaluation of the same.

Please be aware that we have instructed our consultants to take physical traffic counts at the intersections referenced below. Our intent is to utilize the latest traffic model associated with the NCC, once this model has been released from CALTRANS for use on local projects.

I would ask you to please review the list of intersections below to confirm these are the intersections of greatest concern. Your assistance in this regard is appreciated.

1. SR 108 / Coffee Road
2. SR 108 / Oakdale Road
3. Morrill Road / Coffee Road
4. Morrill Road / Oakdale Road
5. Crawford Road / Coffee Road
6. Crawford Road / Oakdale Road
7. Claribel Road / McHenry Avenue
8. Claribel Road / Coffee Road
9. Claribel Road / Oakdale Road
10. Claribel Road / Squire Wells Way
11. Claribel Road / Roselle Avenue
12. Claribel Road / Terminal Avenue
13. Claratina Road / Oakdale Road
14. Oakdale Road / Crossroads SC's North Access
15. Claus at Claribel
16. Roselle at Sylvan
17. Oakdale at Sylvan
18. Coffee at Claratina

Thanks in advance.

JBA

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

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City of Modesto
Community and Economic
Development Department/Planning Division
1010 Tenth Street, Third Floor
Modesto, CA 95354

April 19, 2017

John B. Anderson
City of Riverbank
6707 3rd Street (South Hall)
Riverbank CA 95367

RE: Crossroads West Specific Plan EIR Notice of Preparation

Dear Mr. Anderson:

Thank you for the opportunity to provide comments regarding the subject Notice of Preparation. The City of Modesto understands that the City of Riverbank proposes to annex approximately 390 acres for development of the Crossroads West Specific Plan area. The City of Modesto offers the following comment.

The City of Modesto and the City of Riverbank share a common General Plan boundary along Claribel Road. The City of Modesto is concerned with future growth along the Claribel Road corridor, and impacts resulting from said future growth along the corridor and to intersecting roadways within Modesto's SOI. The City of Modesto provided comments on the original Crossroads project via letters dated July 11 and July 28, 2003. In those letters, we raised concerns related to impacts from the Crossroads project on the integrity of Claribel Road, the planned Expressway at the time of the Crossroads entitlement, and failure of the Crossroads EIR to fully evaluate and mitigate impacts upon the surrounding roadway network.

Claribel Road is currently a two-lane road that carries much more traffic than it was originally designed for. The facility presently operates at a Level of Service (LOS) E, and is forecast to deteriorate to LOS F if much-needed improvements are not made. Because traffic improvements were not adequately addressed by the Crossroads project, the City of Modesto seeks assurances that these same mistakes will not be repeated, and that all necessary traffic concerns, deficiencies and improvements will be addressed with this proposed Crossroads West project. The Crossroads West Specific Plan EIR must document the measures to be

John B. Anderson
April 19, 2017
Page 2

established by the City of Riverbank to ensure that adequate improvements are made to the existing roadway network in order to mitigate traffic-related impacts resulting from the proposed Project.

We appreciate the opportunity to submit our comments regarding the City Riverbank's NOP related to the proposed Crossroads West Specific Plan, EIR and annexation. If you have any questions regarding these comments, please feel free to contact Patrick Kelly, Planning Manager, at 209.577.5268 or by email at pkelly@modestogov.com.

Sincerely,



Patrick Kelly, AICP
Planning Manager

- c. Joseph P. Lopez, Acting City Manager
Cynthia Birdsill, Director of Community & Economic Development



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

March 22, 2017

To: Reviewing Agencies
Re: Crossroads West Specific Plan
SCH# 2017032062

Attached for your review and comment is the Notice of Preparation (NOP) for the Crossroads West Specific Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

John B. Anderson
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017032062
Project Title Crossroads West Specific Plan
Lead Agency Riverbank, City of

Type NOP Notice of Preparation
Description Project includes up to 1,872 LDR units, up to 192 MDR units, up to 388 HDR units, up to 550 sq. ft. of Mixed Use 1 uses, and up to 27,000 sq. ft. of MU 2 uses. The project includes approx. 42 acres of park, open space, and Regional Sports Park uses. The project would require a General Plan Amendment to change use designations to Specific Plan for the entire site. The project would require annexation and rezoning of the entire project site to Specific Plan (SP).

Lead Agency Contact

Name John B. Anderson
Agency City of Riverbank
Phone 209-863-7128 **Fax**
email
Address 6707 3rd Street, South Hall
City Riverbank **State** CA **Zip** 95367

Project Location

County Stanislaus
City Riverbank
Region
Cross Streets Claribel Road/Oakdale Road
Lat / Long
Parcel No.
Township 2S **Range** 9E **Section** 27, 34 **Base** MDMB

Proximity to:

Highways
Airports
Railways BNSF Railway
Waterways Stanislaus River
Schools Stockard ES, Beyer HS
Land Use GP:Ag. (county), and LDR, MDR, HDR, MU, C, CC, P (City); Zoning (Co.): General Ag (A-2-40)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Central Valley Flood Protection Board; Department of Parks and Recreation; Department of Fish and Wildlife, Region 4; Delta Stewardship Council; Department of Housing and Community Development; Native American Heritage Commission; Office of Emergency Services, California; Public Utilities Commission; State Lands Commission; Caltrans, District 10; State Water Resources Control Board, Division of Drinking Water; Department of Toxic Substances Control; Regional Water Quality Control Bd., Region 5 (Sacramento); Delta Protection Commission; San Joaquin River Conservancy

Date Received 03/22/2017 **Start of Review** 03/22/2017 **End of Review** 04/20/2017

2017032062

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P. O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Crossroads West Specific Plan
Lead Agency: City of Riverbank
Mailing Address: 6706 3rd Street, South Hall
City: Riverbank Zip: 95367
Contact Person: John B. Anderson
Phone: (209) 863-7128
County: Stanislaus

Project Location: County: Stanislaus City/Nearest Community: Riverbank
Cross Streets: Claribel Road/Oakdale Road Zip Code: 95357
Lat. / Long.: Total Acres: 390
Assessor's Parcel No.: Section: 27, 34 Twp.: 2S Range: 9E Base: MDMB
Within 2 Miles: State Hwy #: N/A Waterways: Stanislaus River
Airports: N/A Railways: BNSF Railway Schools: Stockard ES, Beyer HS

Document Type:
CEQA: [X] NOP [] Draft EIR [] NEPA [] NOI
[] Early Cons [] Supplement/Subsequent EIR [] EA
[] Neg Dec (Prior SCH No.) [] Draft EIS
[] Mit Neg Dec Other [] FONSI
Other: [] Joint Document
[] Final Document
[] Other

STATE CLEARINGHOUSE

Local Action Type:
[] General Plan Update [X] Specific Plan [] Rezone [X] Annexation
[X] General Plan Amendment [] Master Plan [X] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [X] Site Plan [X] Land Division (Subdivision, etc.) [] Other

Development Type:
[X] Residential: Units 2,852 Acres
[] Office: Sq.ft. Acres Employees
[X] Commercial: Sq.ft. 577k Acres 95.0 Employees
[] Industrial: Sq.ft. Acres Employees
[X] Educational 12-acre Elementary School site
[X] Recreational 42 acres of parks, fields, misc.
[] Water Facilities: Type MGD
[X] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:
[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [] Minerals [X] Soil Erosion/Compaction/Grading [X] Wildlife
[] Coastal Zone [X] Noise [X] Solid Waste [X] Growth Inducing
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Land Use
[X] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [X] Cumulative Effects
[X] Other Green House Gas Emissions, Energy

Present Land Use/Zoning/General Plan Designation:
GP: Ag. (County), and LDR, MDR, HDR, MU, C, CC, P (City); Zoning (Co.): General Ag (A-2-40)

Project Description: (please use a separate page if necessary)
The project includes up to 1,872 LDR units, up to 192 MDR units, up to 388 HDR units, up to 550 square feet (sf) of Mixed Use (MU) 1 uses, and up to 27,000 sf of MU 2 uses. The project includes approximately 42 acres of park, open space, and Regional Sports Park uses. The project would require a General Plan Amendment to change use designations to Specific Plan (SP) for the entire site. The project would require annexation and pre zoning of the entire project site to Specific Plan (SP).

<input type="checkbox"/> Resources Agency Nadell Gayou	<input type="checkbox"/> Fish & Wildlife Region 1E Laurie Harnsberger	<input type="checkbox"/> OES (Office of Emergency Services) Monique Wilber	<input type="checkbox"/> Caltrans, District 8 Mark Roberts	<input type="checkbox"/> Regional Water Quality Control Board (RWQCB)
<input type="checkbox"/> Dept. of Boating & Waterways Denise Peterson	<input type="checkbox"/> Fish & Wildlife Region 2 Jeff Drongesen	<input type="checkbox"/> Native American Heritage Comm. Debbie Treadway	<input type="checkbox"/> Caltrans, District 9 Gayle Rosander	<input type="checkbox"/> RWQCB 1 Cathleen Hudson North Coast Region (1)
<input type="checkbox"/> California Coastal Commission Elizabeth A. Fuchs	<input type="checkbox"/> Fish & Wildlife Region 3 Craig Weightman	<input type="checkbox"/> Public Utilities Commission Supervisor	<input type="checkbox"/> Caltrans, District 10 Tom Dumas	<input type="checkbox"/> RWQCB 2 Environmental Document Coordinator San Francisco Bay Region (2)
<input type="checkbox"/> Colorado River Board Lisa Johansen	<input type="checkbox"/> Fish & Wildlife Region 4 Julie Vance	<input type="checkbox"/> Santa Monica Bay Restoration Guangyu Wang	<input type="checkbox"/> Caltrans, District 11 Jacob Armstrong	<input type="checkbox"/> RWQCB 3 Central Coast Region (3)
<input type="checkbox"/> Dept. of Conservation Crina Chan	<input type="checkbox"/> Fish & Wildlife Region 5 Leslie Newton-Reed Habitat Conservation Program	<input type="checkbox"/> State Lands Commission Jennifer Deleong	<input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> RWQCB 4 Teresa Rodgers Los Angeles Region (4)
<input type="checkbox"/> California Energy Commission Eric Knight	<input type="checkbox"/> Fish & Wildlife Region 6 Tiffany Ellis Habitat Conservation Program	<input type="checkbox"/> Tahoe Regional Planning Agency (TRPA) Cherry Jacques	<input type="checkbox"/> Caltrans, District 12 Maureen El Harake	<input type="checkbox"/> RWQCB 5 Central Valley Region (5)
<input type="checkbox"/> Cal Fire Dan Foster	<input type="checkbox"/> Fish & Wildlife Region 6 I/M Heidi Calvert Inyo/Mono, Habitat Conservation Program	<input type="checkbox"/> Cal State Transportation Agency CalSTA	<input type="checkbox"/> Air Resources Board Airport & Freight Jack Wursten	<input type="checkbox"/> RWQCB 5F Central Valley Region (5) Fresno Branch Office
<input type="checkbox"/> Central Valley Flood Protection Board James Herota	<input type="checkbox"/> Dept. of Fish & Wildlife M William Paznokas Marine Region	<input type="checkbox"/> Caltrans - Division of Aeronautics Philip Critchmins	<input type="checkbox"/> Transportation Projects Nesamani Kalandiyyur	<input type="checkbox"/> RWQCB 5R Central Valley Region (5) Redding Branch Office
<input type="checkbox"/> Office of Historic Preservation Ron Parsons	<input type="checkbox"/> Other Departments	<input type="checkbox"/> Caltrans - Planning HQ LD-IGR Christian Bushong	<input type="checkbox"/> State Water Resources Control Board Regional Programs Unit Division of Financial Assistance	<input type="checkbox"/> RWQCB 6 Lahontan Region (6)
<input type="checkbox"/> Dept of Parks & Recreation Environmental Stewardship Section	<input type="checkbox"/> Food & Agriculture Sandra Schubert Dept. of Food and Agriculture	<input type="checkbox"/> California Highway Patrol Suzann Ikeuchi Office of Special Projects	<input type="checkbox"/> State Water Resources Control Board Cindy Forbes - Asst Deputy Division of Drinking Water	<input type="checkbox"/> RWQCB 6V Lahontan Region (6) Victorville Branch Office
<input type="checkbox"/> California Department of Resources, Recycling & Recovery Sue O'Leary	<input type="checkbox"/> Dept. of General Services Cathy Buck Environmental Services Section	<input type="checkbox"/> Dept. of Transportation	<input type="checkbox"/> State Water Resources Control Board Div. Drinking Water # _____	<input type="checkbox"/> RWQCB 7 Colorado River Basin Region (7)
<input type="checkbox"/> S.F. Bay Conservation & Dev't. Comm. Steve Goldbeck	<input type="checkbox"/> Delta Stewardship Council Kevan Samsam	<input type="checkbox"/> Caltrans, District 1 Rex Jackman	<input type="checkbox"/> State Water Resources Control Board Student Intern, 401 Water Quality Certification Unit Division of Water Quality	<input type="checkbox"/> RWQCB 8 Santa Ana Region (8)
<input type="checkbox"/> Dept. of Water Resources Agency Nadell Gayou	<input type="checkbox"/> Housing & Comm. Dev. CEQA Coordinator Housing Policy Division	<input type="checkbox"/> Caltrans, District 2 Marcelino Gonzalez	<input type="checkbox"/> State Water Resources Control Board Phil Crader Division of Water Rights	<input type="checkbox"/> RWQCB 9 San Diego Region (9)
<input type="checkbox"/> Fish and Game	<input type="checkbox"/> Independent Commissions, Boards Delta Protection Commission Erik Vink	<input type="checkbox"/> Caltrans, District 3 Eric Federicks - South Susan Zanchi - North	<input type="checkbox"/> Dept. of Toxic Substances Control CEQA Tracking Center	<input type="checkbox"/> Other Delta Protection Conservancy
<input type="checkbox"/> Dept. of Fish & Wildlife Scott Flint Environmental Services Division	<input type="checkbox"/> Fish & Wildlife Region 1 Curt Babcock	<input type="checkbox"/> Caltrans, District 4 Patricia Maurice	<input type="checkbox"/> Dept. of Pesticide Regulation CEQA Coordinator	<input type="checkbox"/> San Joaquin River Conservancy

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



March 29, 2017

John Anderson
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

RE: SCH#2017032062, Crossroads West Specific Plan, Stanislaus County

Dear Mr. Anderson:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or

tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
- a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

Central Valley Regional Water Quality Control Board

13 April 2017

John B. Anderson
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

CERTIFIED MAIL
91 7199 9991 7036 6989 0516

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CROSSROADS WEST SPECIFIC PLAN PROJECT, SCH# 2017032062, STANISLAUS COUNTY

Pursuant to the State Clearinghouse's 22 March 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environment Impact Report* for the Crossroads West Specific Plan Project, located in Stanislaus County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases,

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan

(SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering

discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



Stephanie Tadlock
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

CWSP - NOP



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



April 21, 2017

John B. Anderson
City of Riverbank
6707 3rd Street South Hall
Riverbank, CA 95367

Project: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Crossroads West Specific Plan Project

District CEQA Reference No: 20170345

Dear Mr. Anderson:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Notice of Preparation (NOP) for the Crossroads West Specific Plan (CWSP) Project. Per the NOP, the proposed project includes the development of up to 1,872 Low Density Residential (LDR) units, up to 192 Medium Density Residential (MDR) units, and up to 388 High Density Residential (HDR) units. The proposed project also includes up to 550,000 square feet of Mixed Use 1 (MU-1) uses and up to 27,000 square feet of Mixed Use 2 (MU-2) uses. Development in MU-1 could consist of a maximum of 550,000 square foot of retail uses and no residential uses or up to 350 units of residential uses and 360,000 square foot of retail uses. The proposed project is designed to provide flexibility so there are various other hypothetical combinations of retail and residential development, but not more than the maximum density presented would be allowed without an amendment approved by the City. Additionally, the proposed project would increase the size of the existing 11-acre Riverbank Sports Complex to 22 acres. A 10 to 12 acre elementary school is also proposed along with 42 acres of park, and open space uses The District offers the following comments:

Emissions Analysis

- 1) At the federal level for the National Ambient Air Quality Standards (NAAQS), the District is currently designated as extreme nonattainment for the 8-hour ozone standards; nonattainment for the PM2.5 standards; and attainment for the 1-Hour ozone, PM10 and CO standards. At the state level, the District is currently designated as nonattainment for the 8-hour ozone, PM10, and PM2.5 California

Seyed Sadredin
Executive Director/Air Pollution Control Officer

<p>Northern Region 4800 Enterprise Way Modesto, CA 95356-8718 Tel: (209) 557-6400 FAX: (209) 557-6475</p>	<p>Central Region (Main Office) 1990 E. Gettysburg Avenue Fresno, CA 93726-0244 Tel: (559) 230-6000 FAX: (559) 230-6061</p>	<p>Southern Region 34946 Flyover Court Bakersfield, CA 93308-9725 Tel: 661-392-5500 FAX: 661-392-5585</p>
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Ambient Air Quality Standards (CAAQS). The District recommends that the Air Quality section of the Environmental Impact Report (EIR) include a discussion of the following impacts:

- a) **Criteria Pollutants:** Project related criteria pollutant emissions should be identified and quantified. The discussion should include existing and post-project emissions.
 - i) **Construction Emissions:** Construction emissions are short-term emissions and should be evaluated separate from operational emissions. The District recommends preparation of an Environmental Impact Report (EIR) if annual construction emissions cannot be reduced or mitigated to below the following levels of significance: 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM10).
 - *Recommended Mitigation:* To reduce impacts from construction related exhaust emissions, the District recommends feasible mitigation for the project to utilize off-road construction fleets that can achieve fleet average emissions equal to or cleaner than the Tier III emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. This can be achieved through any combination of uncontrolled engines and engines complying with Tier III and above engine standards.
 - ii) **Operational Emissions:** Operational Emissions: Permitted (stationary sources) and non-permitted (mobile sources) sources should be analyzed separately. The District recommends preparation of an Environmental Impact Report (EIR) if the sum of annual permitted and the sum of the annual non-permitted emissions each cannot be reduced or mitigated to below the following levels of significance: 10 tons per year of oxides of nitrogen (NOx), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM10).
 - *Recommended Mitigation:* Project related impacts on air quality can be reduced through incorporation of design elements, for example, that increase energy efficiency, reduce vehicle miles traveled, and reduce construction exhaust related emissions. However, design elements and compliance with District rules and regulations may not be sufficient to reduce project related impacts on air quality to a less than significant level. Another example of a feasible mitigation measure is the mitigation of project emissions through a Voluntary Emission Reduction Agreement (VERA). The VERA is an instrument by which the project proponent provides monies to the District, which is used by the District to fund emission reduction projects that achieve the reductions required by the

lead agency. District staff is available to meet with project proponents to discuss a VERA for specific projects. For more information, or questions concerning this topic, please call District Staff at (559) 230-6000.

- iii) **Recommended Model:** Project related criteria pollutant emissions should be identified and quantified. Emissions analysis should be performed using CalEEMod (**California Emission Estimator Model**), which uses the most recent approved version of relevant Air Resources Board (ARB) emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.
- b) **Nuisance Odors:** The proposed project should be evaluated to determine the likelihood that the project would result in nuisance odors. Nuisance odors are subjective, thus the District has not established thresholds of significance for nuisance odors. Nuisance odors may be assessed qualitatively taking into consideration of project design elements and proximity to off-site receptors that potentially would be exposed objectionable odors.
- c) **Health Impacts:** Project related health impacts should be evaluated to determine if emissions of toxic air contaminants (TAC) will pose a significant health risk to nearby sensitive receptors. TACs are defined as air pollutants that which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. The most common source of TACs can be attributed to diesel exhaust fumes that are emitted from both stationary and mobile sources. Health impacts may require a detailed health risk assessment (HRA).

Prior to conducting an HRA, an applicant may perform a prioritization on all sources of emissions to determine if it is necessary to conduct an HRA. A prioritization is a screening tool used to identify projects that may have significant health impacts. If the project has a prioritization score of 10 or more, the project has the potential to exceed the District's significance threshold for health impacts of 20 in a million and an HRA should be performed.

If an HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach. The proposed project would be considered to have a significant health risk if the HRA demonstrates that project related health impacts would exceed the District's significance threshold of 20 in a million.

More information on TACs, prioritizations and HRAs can be obtained by:

- E-mailing inquiries to: hramodeler@valleyair.org; or
- Visiting the District's website at:
http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

- 2) In addition to the discussions on potential impacts identified above, the District recommends the EIR also include the following discussions:
 - a) A discussion of the methodology, model assumptions, inputs and results used in characterizing the project's impact on air quality. To comply with CEQA requirements for full disclosure, the District recommends that the modeling outputs be provided as appendices to the EIR. The District further recommends that the District be provided with an electronic copy of all input and output files for all modeling.
 - b) A discussion of the components and phases of the project and the associated emission projections, including ongoing emissions from each previous phase.
 - c) A discussion of project design elements and mitigation measures, including characterization of the effectiveness of each mitigation measure incorporated into the project.
 - d) A discussion of whether the project would result in a cumulatively considerable net increase of any criteria pollutant or precursor for which the San Joaquin Valley Air Basin is in non-attainment. More information on the District's attainment status can be found online by visiting the District's website at: <http://valleyair.org/aqinfo/attainment.htm>.

District Rules and Regulations

- 3) The proposed project may be subject to District rules and regulations, including: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).
- 4) The proposed project may require District permits. Prior to the start of construction the project proponent should contact the District's Small Business Assistance Office at (209) 557-6446 to determine if an Authority to Construct (ATC) is required.
- 5) The proposed project would equal or exceed the relevant District Rule 9510 (Indirect Source Review) applicability threshold of 50 residential units, 2,000 square feet of commercial space, and 9,000 square feet of educational space. Therefore, the District concludes that the proposed project is subject to District Rule 9510.

Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees. If approval of the subject project constitutes the last discretionary approval by your agency, the

District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at: <http://www.valleyair.org/ISR/ISRHome.htm>.

- 6) Particulate Matter 2.5 microns or less in size (PM2.5) from under-fired charbroilers (UFCs) pose immediate health risk. Since the cooking of meat can release carcinogenic PM2.5 species like polycyclic aromatic hydrocarbons (PAH), controlling emissions from under-fired charbroilers will have a substantial positive impact on public health.

Charbroiling emissions occur in populated areas, near schools and residential neighborhoods, resulting in high exposure levels for sensitive Valley residents. The air quality impacts on neighborhoods near restaurants with UFCs can be significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. This potential for neighborhood-level concentration of emissions during evening or multi-day stagnation events raises environmental concerns.

In addition, the cooking emissions source category is one of the largest single contributors of directly emitted PM2.5 in the Valley. Photochemical modeling conducted for the 2012 PM2.5 Plan showed that reducing commercial charbroiling emissions is critical to achieving PM2.5 attainment in the Valley.

The District committed to amend Rule 4692 (Commercial Charbroiling) in 2016, with a 2017 compliance date, to add emission control requirements for UFCs, as committed to in the District's 2012 PM2.5 Plan. Installing charbroiler emissions control systems during construction of new facilities is likely to result in substantial economic benefit compared to costly retrofitting.

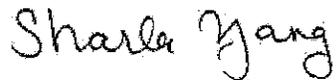
Therefore, the District strongly recommends that your agency require new restaurants that will operate UFCs to install emission control systems during the construction phase. To ease the financial burden for Valley businesses that wish to install control equipment before it is required, the District is offering incentive funding during the time leading up to the amendment to the rule. Restaurants with UFCs may be eligible to apply for funding to add emission control systems. Please contact the District at (559) 230-5858 for more information.

- 7) The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446. Current District rules can be found online at the District's website at: www.valleyair.org/rules/1ruleslist.htm.

The District recommends that a copy of the District's comments be provided to the project proponent. If you have any questions or require further information, please call Sharla Yang at (559) 230-5934.

Sincerely,

Arnaud Marjollet
Director of Permit Services

A handwritten signature in cursive script that reads "Sharla Yang".

For Brian Clements
Program Manager

AM: sy

John Anderson

From: Fuentes, Eduardo@DOT <eduardo.fuentes@dot.ca.gov>
Sent: Monday, April 17, 2017 1:29 PM
To: john@jbandersonplanning.com
Subject: Riverbank-Crossroads West Specific Plan

Hello, see comments below:

Page 86 Transportation and Traffic of NOP states that a detailed analysis to determine the traffic impacts will be done in the EIR stage since the increase in traffic will create a potentially significant impact. Please provide a Traffic Impact Analysis, which analyzes intersections on SR 108 being impacted by project traffic, in order to determine proper impacts and required mitigation(s) to SR 108.

Please let me know if you have any questions.

Thank You,

Eduardo Fuentes
Metropolitan Planning
Caltrans District-10
209-948-7783

4-17-17

FORWARDED TO

- ED ANDERSON

- DENNIS PLANNING

April 21, 2017

John B. Anderson
City of Riverbank
6707 3rd St., South Hall
Riverbank, CA 95367

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
FOR THE CROSSROADS WEST SPECIFIC PLAN PROJECT**

Dear Mr. Anderson:

Thank you for the opportunity to review the Notice of Preparation and Initial Study for the Crossroads West Specific Plan. As Lead Agency, the City of Riverbank is responsible for considering the effects, both individual and collective, of all activities involved in the project (Public Resources Code §21000 et seq). LAFCO, as a Responsible Agency, will utilize the CEQA documents prepared by the City in reviewing any future annexation within the updated Specific Plan area. The following comments are provided for the City's consideration:

- **Change of Organization (Annexation):** An annexation to a city requires LAFCO to consider several factors as outlined in Government Code Section 56668. The factors cover a wide variety of items and include: orderly growth, impacts to surrounding areas and agricultural lands, social and economic interests, and consistency with local plans and policies.
- **Agricultural Resources:** One of LAFCO's main charges, as set forth by the Legislature, is to protect and promote agriculture. The Commission has adopted an Agricultural Preservation Policy that requires applicants to prepare a "Plan for Agricultural Preservation" for annexation proposals that will impact agricultural lands. The Plan must include information such as the proposal's direct and indirect impacts to agricultural resources, the availability of other lands in the City's existing boundaries, and relevant General Plan policies. The Plan must also specify the method or strategy proposed to minimize the loss of agricultural lands. The information provided in the Plan should be consistent with the environmental documentation prepared by the City.
- **Plan for Providing Services:** Pursuant to LAFCO policies and Government Code §56653, the proposal must show that the City has the necessary services available to serve the proposed annexation area. This analysis must include detailed evidence of current and future service levels, sufficient sewer capacity, sufficient quantities and quality of water, police and fire services, and financing mechanisms for these services. Evidence must also be provided indicating that the annexing agency can at least maintain the current level of public services already provided within its boundaries.

- **Impacts to Special Districts:** The proposed Specific Plan Area is currently within the boundaries of the Stanislaus Consolidated Fire Protection District and Modesto Irrigation District. As part of the proposal's review, LAFCO will also consider impacts to these agencies as a result of the annexation. Pursuant to LAFCO policy, the Commission will deny proposals that would result in significant immitigable adverse effects upon other service recipients or other agencies servicing the affected area unless the approval is conditioned to avoid such impacts. The environmental analysis should identify if any future annexation will include new tax sharing agreements or assessments and include a discussion of any impacts as a result.

If you have any questions regarding these comments, please contact our office at (209) 525-7660.

Sincerely,



Sara Lytle-Pinhey
Executive Officer



CHIEF EXECUTIVE OFFICE

Stan Risen
Chief Executive Officer

Patricia Hill Thomas
*Chief Operations Officer/
Assistant Executive Officer*

Keith D. Boggs
Assistant Executive Officer

Jody Hayes
Assistant Executive Officer

1010 10th Street, Suite 6800, Modesto, CA 95354
Post Office Box 3404, Modesto, CA 95353-3404

Phone: 209.525.6333 Fax 209.544.6226

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

April 21, 2017

John B. Anderson, Project Planner
City of Riverbank
Development Services Department
6707 3rd Street, South Hall
Riverbank, CA 95367

**SUBJECT: ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS
WEST SPECIFIC PLAN PROJECT – NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING**

Mr. Anderson:

Thank you for the opportunity to review and comment on the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and provides the following comments:

Agricultural Resources

The proposed project will convert approximately 380 acres of land located west of the current Riverbank City Limits and currently designated as Agriculture in the Stanislaus County General Plan to non-agricultural uses. The Environmental Impact Report (EIR) should evaluate the conversion of prime agricultural land to non-agricultural uses. The EIR analysis should also evaluate whether the conversion of the agricultural lands will have a significant adverse effect on surrounding farming operations located outside, but adjacent to the project site. The analysis should evaluate direct, indirect and cumulative effects of the conversion of prime agricultural resources to non-agricultural uses.

As a potential mitigation measure, Policy 2.15 of the County's Agricultural Element requires replacement of agricultural land at a 1:1 ratio with agricultural land of equal or greater quality located in Stanislaus County when agriculturally designated land is amended to a residential land use designation.

**ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC
PLAN PROJECT – NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT
REPORT AND SCOPING MEETING**

April 21, 2017

Page 2

The environmental assessment of the proposed project should also articulate the effectiveness of any proposed conservation easements and/or any in-lieu fees to preserving agricultural land uses. In accordance with the County agricultural conservation polices, the City is encouraged, to the greatest extent possible, to direct development away from the County's most productive agricultural area.

Traffic/Circulation

Public Works looks forward to working with the City of Riverbank in developing the Traffic Impact Analysis area of study for the Crossroads West Specific Plan.

The ERC appreciates the opportunity to comment on this project.

Sincerely,



Patrick Cavanah
Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

April 17, 2017

City of Riverbank
Attention: John B. Anderson
6707 3rd Street South Hall
Riverbank, CA 95367

RE: *Environmental Impact Report (EIR) for the Crossroads West Specific Plan*
Location: E/of Oakdale Rd, s/by Claribel Rd

Thank you for the opportunity to comment on this referral. Following are the recommendations from our Risk & Property, Electrical, Irrigation, and Domestic Water Divisions:

Irrigation

- Modesto Irrigation District (MID) operates an expansive system of canals, ditches, and pipelines which provide irrigation service to lands within its irrigation service area. The City of Riverbank's (City) proposed Crossroads West Specific Plan (Crossroads) area lies within MID's irrigation service area. Please see the attached project site map for clarification purposes. Planned urban development within MID's irrigation service area typically requires the upgrade and/or relocation of existing MID infrastructure to accommodate planned development.
- In general, MID won't allow for piecemeal facility relocation projects of its existing irrigation infrastructure and recommends pre-consultation with MID Civil Engineering staff during preliminary planning. The City's Crossroads West Specific Plan update must provide a regional approach to the proposed modifications and/or relocations of MID's existing infrastructure.
- While there may be additional project specific conditions, the below noted conditions of approval may apply to specific projects within the proposed Crossroads expansion. It should be noted that any and all project-specific conditions of approval are subject to change by MID.
 - No new stormwater discharges will be permitted into MID's irrigation infrastructure unless a Stormwater Discharge Agreement has been approved by the MID Board of Directors.
 - Stormwater infrastructure must be designed to meet required holding times during historical stormwater events and must meet water quality requirements set forth by MID.
 - Future stormwater discharge into the MID Main Canal is limited to the upper northwest corner of the proposed Crossroads area. Due to discharge limitations, discharge into MID's Main Canal may only be permitted downstream of the Hardy Weir. Please see the attached project site map for clarification purposes.
 - Future stormwater discharge into MID's Lateral No. 6 is also limited in capacity. Therefore, modification of the existing Crossroads MID Discharge Agreement as noted in the last paragraph on page 24 of the Crossroads West Specific Plan will need to be discussed with MID Civil Engineering Department staff.

- Due to limited capacity in MID's Main Canal and Lateral No. 6, MID requires all stormwater runoff north of the proposed Crawford Road be diverted to MID's Main Canal downstream of the Hardy Weir. All stormwater runoff south of the proposed Crawford Road must be diverted into MID's Lateral No. 6.
- MID requires written recorded easements or Grant in Fee title for its irrigation and drainage infrastructure.
- MID won't allow irrigation infrastructure to be installed within roadways.
- Relocation of MID irrigation infrastructure to the benefit of the development must be coordinated and approved by MID. All costs associated with design, approval and analysis of relocations shall be at the Developer's expense.
- License Agreements are required for any existing encroachments or proposed improvements within the current or requested MID easement/right-of-way.
- No public access, such as pedestrian crossings, will be permitted within MID Lateral right-of-way.
- A bridge must be constructed for the proposed vehicle circulation across MID's Lateral No. 6.
- The Developer should provide private irrigation and drainage easements as necessary to insure that existing irrigation customers maintain access to necessary irrigation and drainage infrastructure.
- MID will require a Facility Modification Agreement before any work can be done on MID irrigation infrastructure.
- MID requires the installation of a six (6) foot tall solid masonry wall, or MID pre-approved equivalent, prior to any development adjacent to MID Laterals.
- The Developer must provide drainage for stormwater runoff that may accumulate between MID's Lateral(s) and the MID-required six foot tall solid masonry wall.
- MID will require the Developer to submit to MID's Civil Engineering Department the proposed plans, MID's *Application for Land Development Project Review* form, and the respective fees as noted on the Application.
- All work that may affect irrigation facilities must occur during the non-irrigation season (typically November 1 to March 1). Irrigation service must not be interrupted.

Domestic Water/Risk & Property

- No comments at this time.

Electrical

- The attached map shows the approximate location of the District's existing electrical facilities in the project area.
- In conjunction with related site/road improvement requirements, existing overhead and underground electric facilities within or adjacent to the proposed plan shall be protected, relocated or removed as required by the District's Electric Engineering Department. Appropriate easements for electric facilities shall be granted when specific areas are developed.

- Relocation or Installation of electric facilities shall conform to the District's Electric Service Rules.
- Costs for relocation and/or undergrounding the District's electrical facilities at the request of others will be borne by the requesting party. Estimates for relocating or undergrounding existing facilities will be supplied upon request.
- MID currently has existing overhead 69,000 volt and 12,000 volt electric facilities within and adjacent to the subject area and prefers to maintain the existing overhead electrical facilities, where practical, due to economic, reliability and operating concerns. Existing and future 69,000 volt overhead lines cannot be installed underground. MID reserves the right to install new 69,000 volt overhead electrical facilities along any street for the purpose of maintaining a reliable electric system and servicing future development associated with future expansion into undeveloped land.
- A 10' PUE is required along all existing and proposed street frontages.
- MID requires a 15' PUE along all properties that are adjacent to road Right-of-Way and have overhead high voltage electric transmission and distribution lines adjacent to them. These easements are necessary in order to protect the existing overhead high voltage lines and maintain necessary safety clearances.
- The Modesto Irrigation District reserves its future right to utilize its property, including the MID canals in a manner it deems necessary for the installation and maintenance of overhead or underground electric and telecommunication facilities. These needs, which have not yet been determined, may consist of new towers, poles, cross arms, wires, cables, braces, insulators, transformers, service lines, control structures and any necessary appurtenances, as may in the District's opinion, be necessary or desirable. Maintain a minimum 20 ft. clearance adjacent to the existing 69,000 volt and 12,000 volt overhead lines along MID Lateral No. 6
- Electric service to individual parcels within the proposed Specific Plan may not be available at this time. Customers should contact the District's Electric Engineering Department when parcels are ready for development.

The Modesto Irrigation District reserves its future rights to utilize its property, including its canal and electrical easements and rights-of-way, in a manner it deems necessary for the installation and maintenance of electric, irrigation, agricultural and urban drainage, domestic water and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, crossarms, wires, cables, braces, insulators, transformers, service lines, open channels, pipelines, control structures and any necessary appurtenances, as may, in District's opinion, be necessary or desirable.

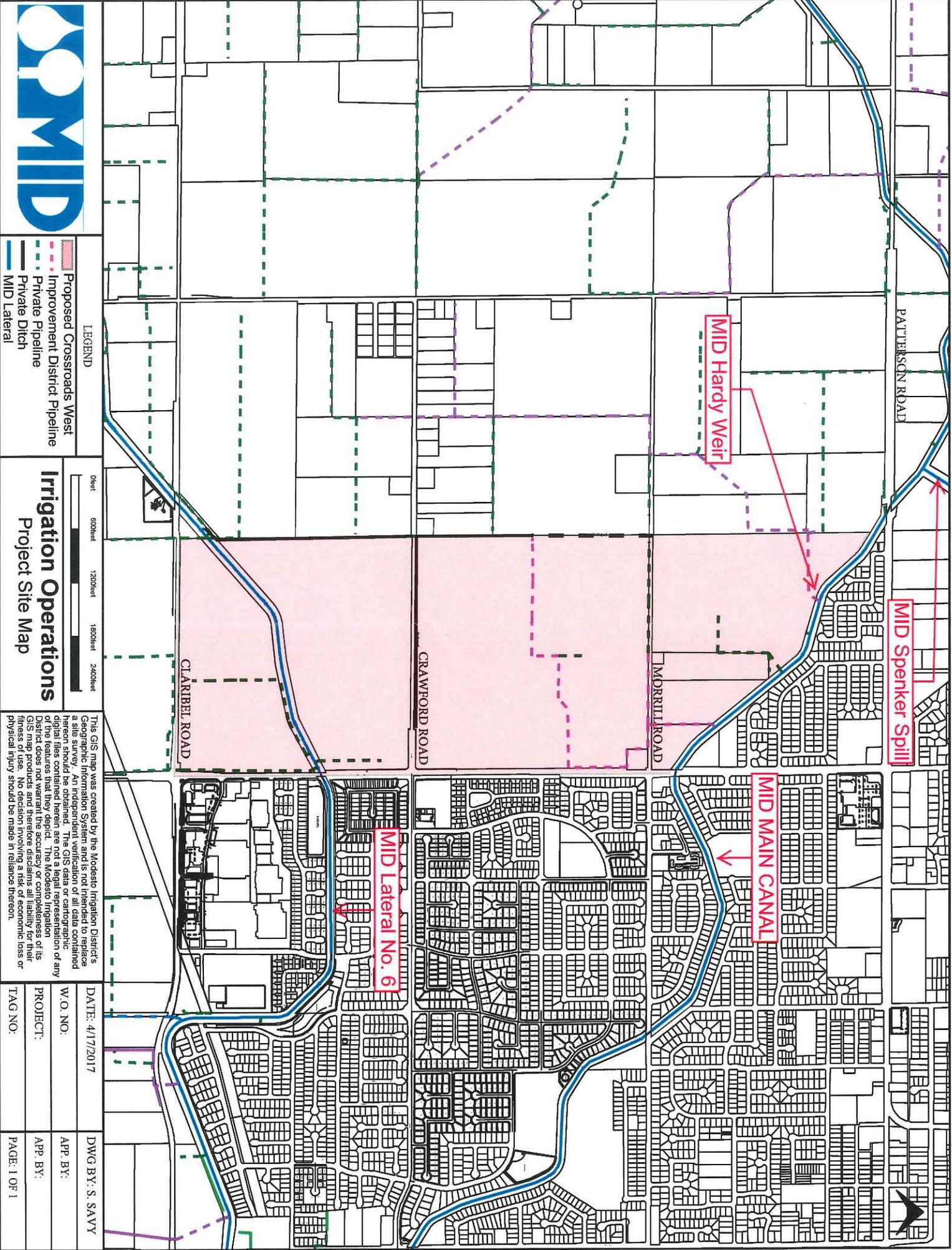
If you have any questions, please contact me at 526-7447.

Sincerely,



Lien Campbell
Risk & Property Analyst

Copy: DeNovo Planning Group, Attention: Steve McMurtry
File



PATTERSON ROAD

MID Spenker Spill

MID Hardy Weir

MORRILL ROAD

CRAWFORD ROAD

CLARIBEL ROAD

MID MAIN CANAL

MID Lateral No. 6

LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral



**Irrigation Operations
Project Site Map**

This GIS map was created by the Modesto Irrigation District's GIS department. Information is provided as a service to the public and is not intended to be used for any purpose other than that for which it was provided. The GIS data or cartographic digital files contained herein are not a legal representation of any of the features that they depict. The Modesto Irrigation District does not warrant the accuracy or completeness of its GIS map products and therefore disclaims all liability for their fitness of use. No decision involving a risk of economic loss or physical injury should be made in reliance thereon.

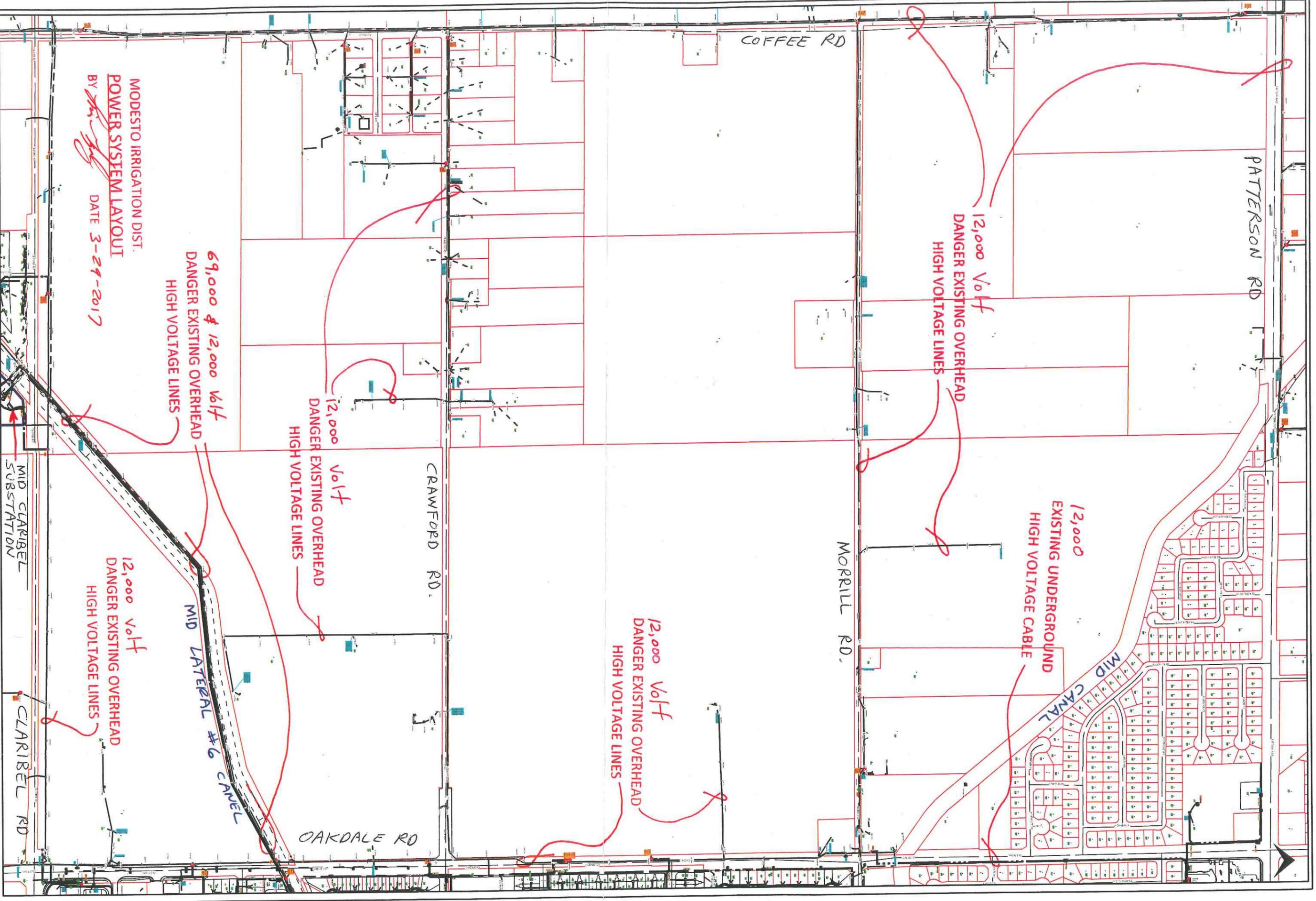
DATE: 4/17/2017	DWG BY: S. SAVY
W.O. NO:	APP. BY:
PROJECT:	APP. BY:
TAG NO:	PAGE: 1 OF 1



NO.	REVISION	DATE

0feet	400feet	800feet	1200feet	1600feet	2000feet
CROSSROADS WEST SPECIFIC PLAN Riverbank					

DATE: 03/28/2017	DWG BY: lauisg
W.O. NO.:	APP. BY:
PROJECT:	APP. BY:
TAG NO.:	PAGE: 1 OF 1



MODESTO IRRIGATION DIST.
 POWER SYSTEM LAYOUT
 BY *[Signature]*
 DATE 3-29-2017

69,000 & 12,000 Volt
 DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

12,000
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

April 18, 2017

City of Riverbank
Attention: John B. Anderson
6707 3rd Street South Hall
Riverbank, CA 95367

RE: Notion of Preparation and Initial Study (NOP/IS)
Location: City of Riverbank city limits to the North & East

Thank you for the opportunity to comment on this referral. Following are the recommendations from our Risk & Property, Electrical, Irrigation, and Domestic Water Divisions:

Irrigation

- Modesto Irrigation District (MID) operates an expansive system of canals, ditches, and pipelines which provide irrigation service to lands within its irrigation service area. The City of Riverbank's (City) proposed Crossroads West Specific Plan (Crossroads) area lies within MID's irrigation service area. Please see the attached project site map for clarification purposes. Planned urban development within MID's irrigation service area typically requires the upgrade and/or relocation of existing MID infrastructure to accommodate planned development.
- In general, MID won't allow for piecemeal facility relocation projects of its existing irrigation infrastructure and recommends pre-consultation with MID Civil Engineering staff during preliminary planning. The City's Crossroads West Specific Plan update must provide a regional approach to the proposed modifications and/or relocations of MID's existing infrastructure.
- While there may be additional project specific conditions, the below noted conditions of approval may apply to specific projects within the proposed Crossroads expansion. It should be noted that any and all project-specific conditions of approval are subject to change by MID.
 - No new stormwater discharges will be permitted into MID's irrigation infrastructure unless a Stormwater Discharge Agreement has been approved by the MID Board of Directors.
 - Stormwater infrastructure must be designed to meet required holding times during historical stormwater events and must meet water quality requirements set forth by MID.
 - Future stormwater discharge into the MID Main Canal is limited to the upper northwest corner of the proposed Crossroads area. Due to discharge limitations, discharge into MID's Main Canal may only be permitted downstream of the Hardy Weir. Please see the attached project site map for clarification purposes.
 - Future stormwater discharge into MID's Lateral No. 6 is also limited in capacity. Therefore, modification of the existing Crossroads MID Discharge Agreement as noted in the last paragraph on page 24 of the Crossroads West Specific Plan will need to be discussed with MID Civil Engineering Department staff.

- Due to limited capacity in MID's Main Canal and Lateral No. 6, MID requires all stormwater runoff north of the proposed Crawford Road be diverted to MID's Main Canal downstream of the Hardy Weir. All stormwater runoff south of the proposed Crawford Road must be diverted into MID's Lateral No. 6.
- MID requires written recorded easements or Grant in Fee title for its irrigation and drainage infrastructure.
- MID won't allow irrigation infrastructure to be installed within roadways.
- Relocation of MID irrigation infrastructure to the benefit of the development must be coordinated and approved by MID. All costs associated with design, approval and analysis of relocations shall be at the Developer's expense.
- License Agreements are required for any existing encroachments or proposed improvements within the current or requested MID easement/right-of-way.
- No public access, such as pedestrian crossings, will be permitted within MID Lateral right-of-way.
- A bridge must be constructed for the proposed vehicle circulation across MID's Lateral No. 6.
- The Developer should provide private irrigation and drainage easements as necessary to insure that existing irrigation customers maintain access to necessary irrigation and drainage infrastructure.
- MID will require a Facility Modification Agreement before any work can be done on MID irrigation infrastructure.
- MID requires the installation of a six (6) foot tall solid masonry wall, or MID pre-approved equivalent, prior to any development adjacent to MID Laterals.
- The Developer must provide drainage for stormwater runoff that may accumulate between MID's Lateral(s) and the MID-required six foot tall solid masonry wall.
- MID will require the Developer to submit to MID's Civil Engineering Department the proposed plans, MID's *Application for Land Development Project Review* form, and the respective fees as noted on the Application.
- All work that may affect irrigation facilities must occur during the non-irrigation season (typically November 1 to March 1). Irrigation service must not be interrupted.

Domestic Water/Risk & Property

- No comments at this time.

Electrical

- The attached drawings are marked showing the approximate location of the District's existing electrical facilities.
- In conjunction with related site improvement requirements, existing overhead and underground electric facilities within or adjacent to the proposed development shall be protected, relocated or removed as required by the District's Electric Engineering Department. Appropriate easements for relocation of electric facilities shall be granted as required.

- Costs for relocation and/or undergrounding the Districts facilities at the request of others will be borne by the requesting party. Estimates for relocating or undergrounding existing facilities will be supplied upon request.
- Relocation or Installation of electric facilities shall conform to the Districts Electric Service Rules.
- A 15' clearance shall be maintained adjacent to the existing 12kv overhead high voltage lines in order to protect the existing electric facilities and to maintain necessary safety clearances.
- A 10' PUE is required along all existing and proposed street frontages. The easements are required to protect the overhead and underground electric facilities and maintain necessary safety clearances.
- High voltage 69,000 volt and 12,000 volt overhead/underground lines and overhead/underground secondary cables are located along Oakdale Rd, Claribel Rd, Morrill Rd and within the project area. Extreme caution should be taken when operating heavy equipment, using a crane, backhoes, hand held tools or any other type of equipment near the underground and overhead high voltage electric facilities.
- The Modesto Irrigation District reserves its future right to utilize its property, including the MID canal adjacent to PARCEL 074-014-006, in a manner it deems necessary for the installation of electric and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, high voltage electric overhead lines, cross arms, braces, insulators, transformers, service lines, control structures and any necessary appurtenances, as may, in the District's opinion, be necessary or desirable.
- Any specific issues related to high density residential development will be addressed when construction projects are submitted for review.
- Customer should contact the District's Electric Engineering Department attention Linh Nguyen at (209) 526-7438 if additional information is required. Additional easements may be required with development of this project.

The Modesto Irrigation District reserves its future rights to utilize its property, including its canal and electrical easements and rights-of-way, in a manner it deems necessary for the installation and maintenance of electric, irrigation, agricultural and urban drainage, domestic water and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, crossarms, wires, cables, braces, insulators, transformers, service lines, open channels, pipelines, control structures and any necessary appurtenances, as may, in District's opinion, be necessary or desirable.

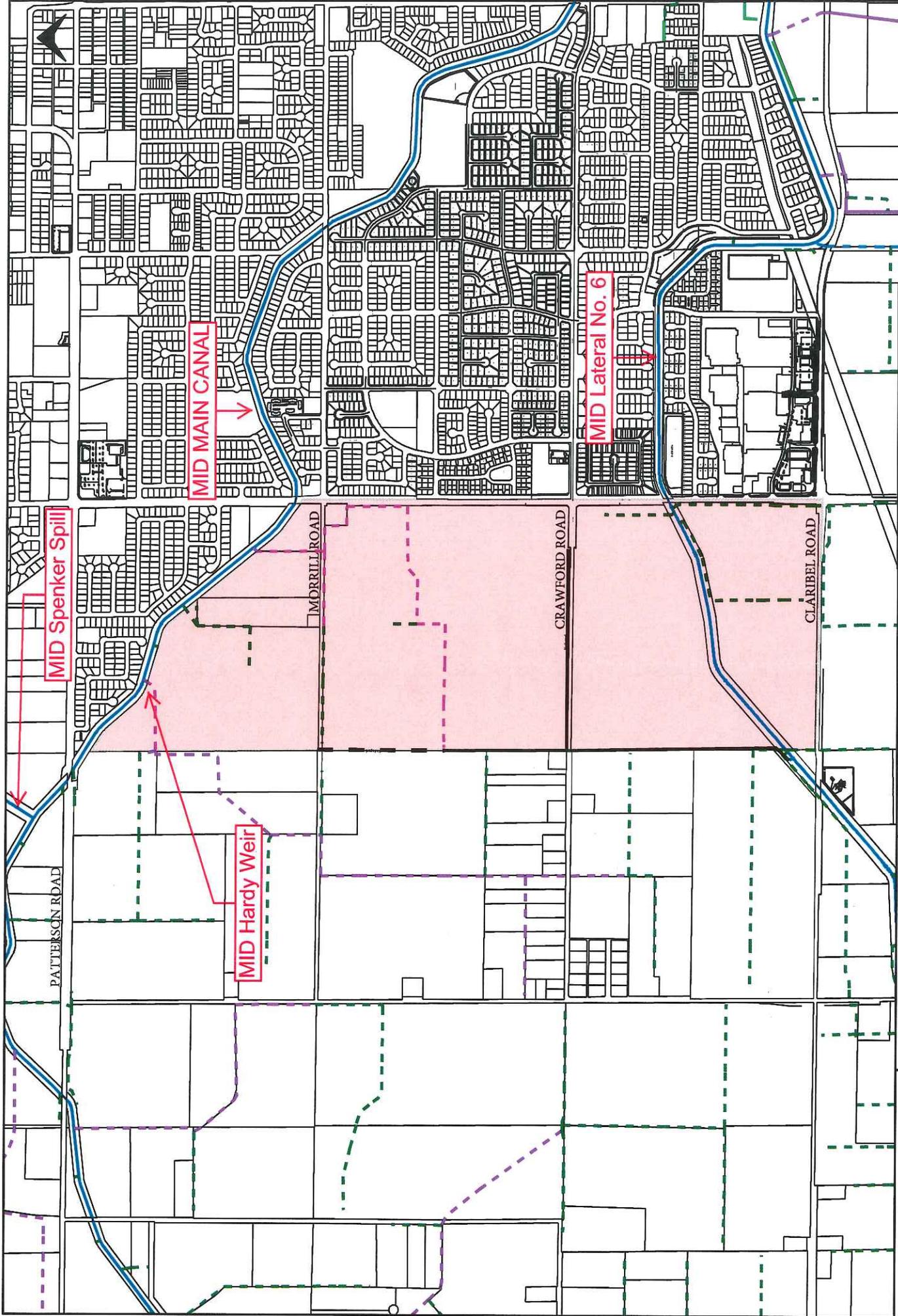
If you have any questions, please contact me at 526-7447.

Sincerely,



Lien Campbell
Risk & Property Analyst

Copy: File



LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral

**Irrigation Operations
Project Site Map**

0feet 600feet 1200feet 1800feet 2400feet

W.O. NO.: _____

PROJECT: _____

TAG NO.: _____

DATE: 4/17/2017

DWG BY: S. SAVY

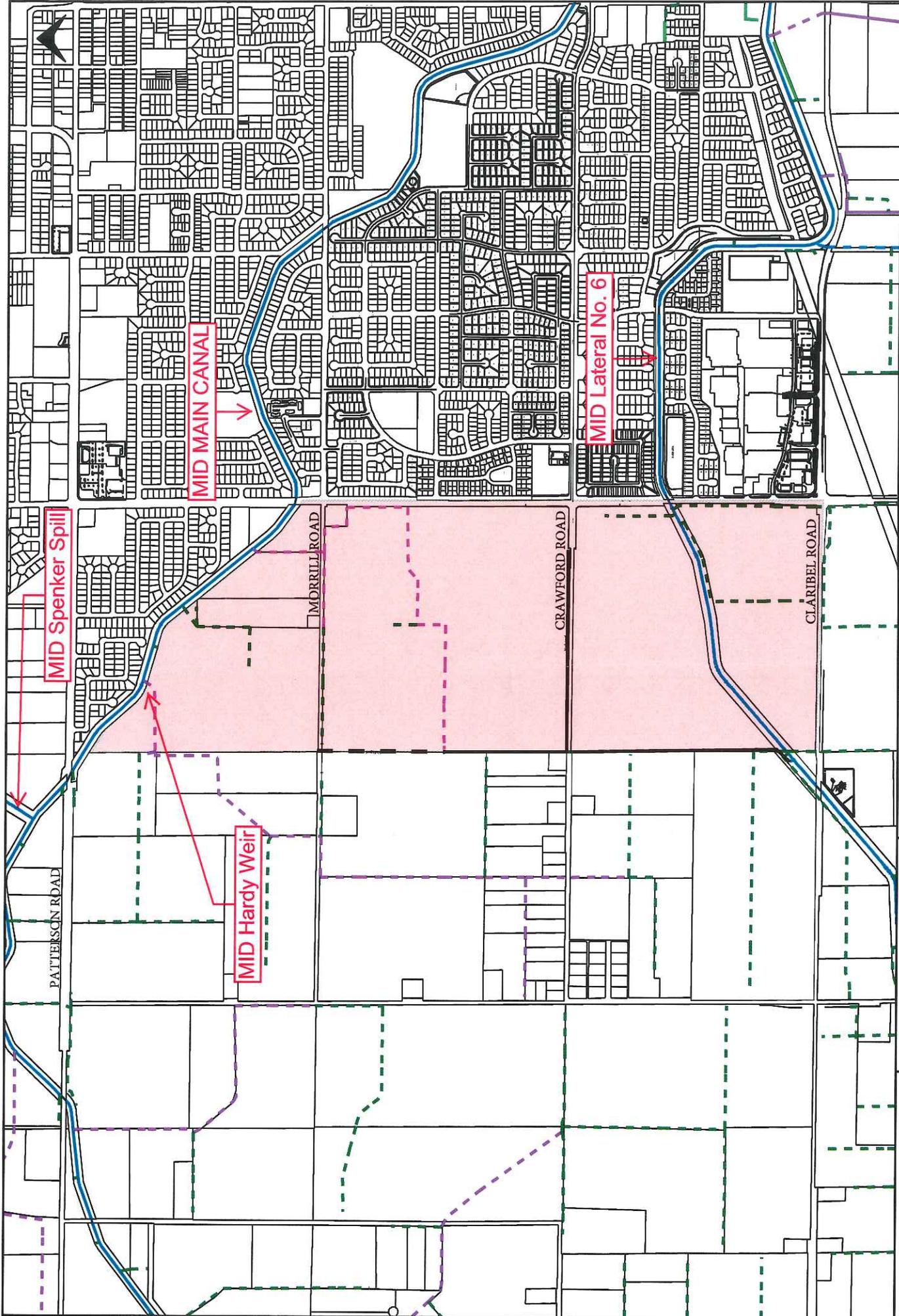
APP. BY: _____

APP. BY: _____

PAGE: 1 OF 1

This GIS map was created by the Modesto Irrigation District's Geographic Information System and is not intended to replace a site survey. An independent verification of all data contained in this site survey is required. The Modesto Irrigation District's digital files contained herein are a best representation of any of the features that they depict. The Modesto Irrigation District does not warrant the accuracy or completeness of its GIS map products and therefore disclaims all liability for their fitness of use. No decision involving a risk of economic loss or physical injury should be made in reliance thereon.





LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral

Scale

0feet 60feet 120feet 180feet 240feet

Scale Bar

0 60 120 180 240

Scale Text

0feet 60feet 120feet 180feet 240feet

Irrigation Operations
Project Site Map

DISCLAIMER

This GIS map was created by the Modesto Irrigation District's Geographic Information System and is not intended to replace the information contained in the GIS data files. The GIS data files contained herein are not a legal representation of any of the features that they depict. The Modesto Irrigation District does not warrant the accuracy or completeness of its GIS map products and therefore disclaims all liability for their fitness of use. No decision involving a risk of economic loss or physical injury should be made in reliance thereon.

DATE: 4/17/2017

W.O. NO.:

PROJECT:

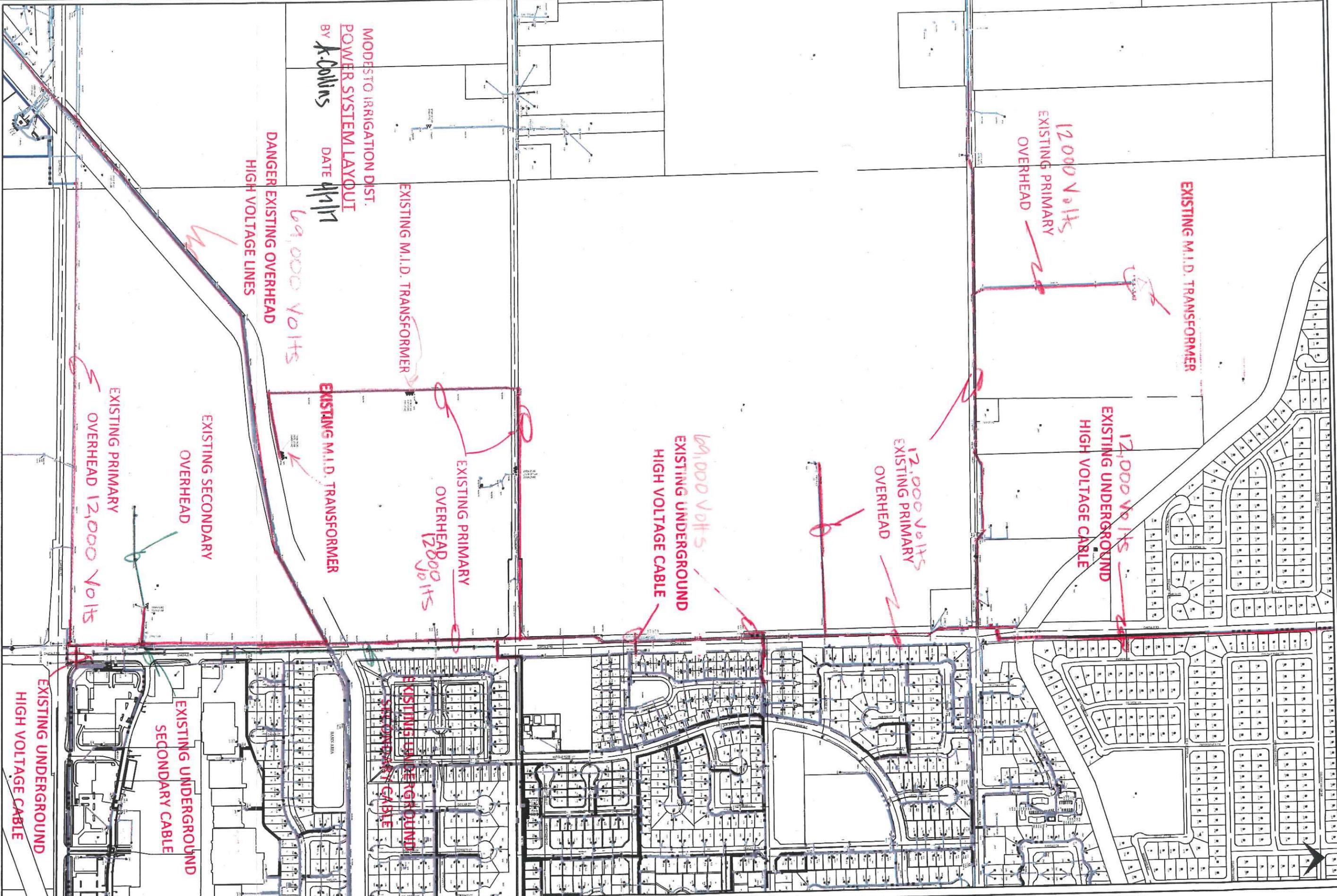
TAG NO.:

DWG BY: S. SAVY

APP. BY:

APP. BY:

PAGE: 1 OF 1



MODESTO IRRIGATION DIST.
 POWER SYSTEM LAYOUT
 BY *K. Collins*
 DATE *4/1/17*

DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

69,000 Volts

EXISTING M.I.D. TRANSFORMER

EXISTING M.I.D. TRANSFORMER

EXISTING PRIMARY
 OVERHEAD
12,000 Volts

69,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

12,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

EXISTING M.I.D. TRANSFORMER

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

EXISTING PRIMARY
 OVERHEAD

12,000 Volts

EXISTING SECONDARY
 OVERHEAD

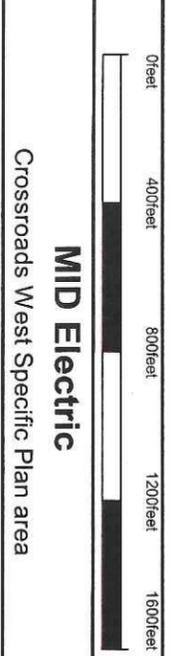
EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

EXISTING UNDERGROUND
 SECONDARY CABLE

EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

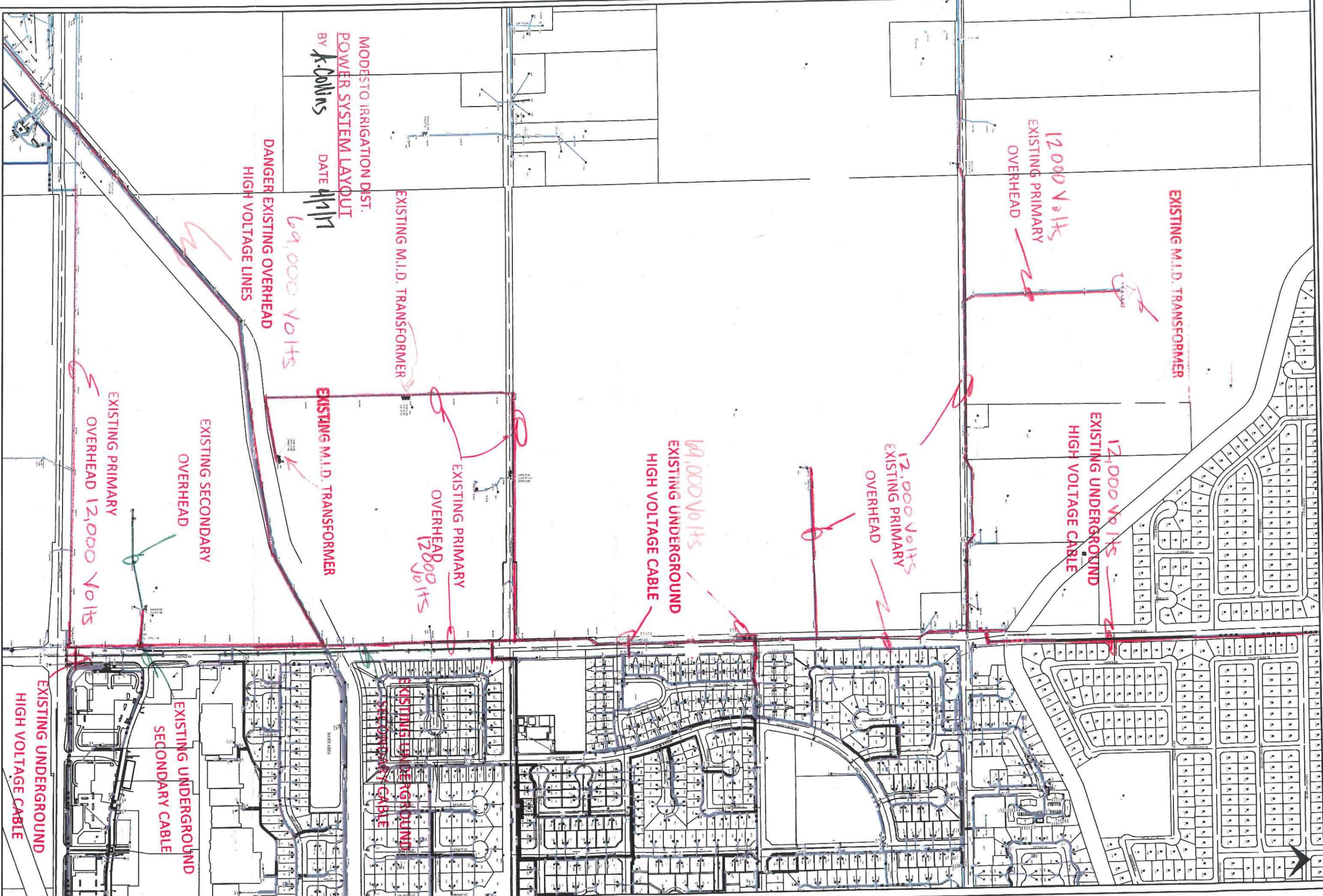


NO.	REVISION	DATE



DATE: 04/06/2017	DWG BY: Amadad73
W.O. NO:	APP. BY:
PROJECT:	APP. BY:
TAG NO:	PAGE: 1 OF 1

MID Electric
 Crossroads West Specific Plan area



MODESTO IRRIGATION DIST.
 POWER SYSTEM LAYOUT
 BY *K. Collins*
 DATE *4/1/17*

DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

69,000 Volts

EXISTING M.I.D. TRANSFORMER

EXISTING M.I.D. TRANSFORMER

EXISTING PRIMARY
 OVERHEAD
12,000 Volts

19,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

EXISTING M.I.D. TRANSFORMER

12,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

EXISTING PRIMARY

OVERHEAD *12,000 Volts*

EXISTING SECONDARY
 OVERHEAD

EXISTING UNDERGROUND
 SECONDARY CABLE

EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE



NO.	REVISION	DATE



MID Electric
 Crossroads West Specific Plan area

DATE: 04/06/2017	DWG BY: Amadaul713
W.O. NO:	APP BY:
PROJECT:	APP BY:
TAG NO:	PAGE: 1 OF 1



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San Diego
(619) 525-1300

Washington, DC
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Christopher J. Diaz
(925) 977-3309
christopher.diaz@bbklaw.com
File No. 38075.00001

April 21, 2017

VIA E-MAIL AND U.S. MAIL

John B. Anderson, Project Planner
City of Riverbank, Development Services Department
6707 3rd Street, South Hall
Riverbank, CA 95367
john@jbandersonplanning.com

Re: March 2017 Notice of Preparation and Initial Study for the Crossroads
West Specific Plan

Dear Mr. Anderson:

Our client, the Stanislaus Consolidated Fire Protection District (Fire District), is in receipt of the Notice of Preparation (NOP) and Initial Study for the Crossroads West Specific Plan (CRWSP or Project) in the City of Riverbank (City). The Fire District values the opportunity to comment on the proposed Project to ensure that the Fire District continues to meet the service delivery needs of the Riverbank community. To that end, the Fire District Board of Directors established an ad hoc committee to work with the City during this Project and provide a detailed and thorough review of all Project-related documents. The Fire District was hopeful that it could have more time to submit comments on the NOP, but the City unfortunately denied a short seven day extension requested by the District. Based on the Fire District's commitment to providing fire protection services, we hereby submit our comments on the NOP regarding the scope and contents of the Environmental Impact Report (EIR), including the topics for which the Fire District believe analysis is required to ensure the EIR adequately ascertains, discloses, and feasibly mitigates, the potential environmental impacts of the Project.

The CRWSP NOP and Initial Study, in accordance with the California Environmental Quality Act (Pub. Resources Code, § 21000 *et seq.* (CEQA); California Code of Regs., Title 14, § 15000 *et seq.* (State CEQA Guidelines)), discloses that the potential impacts from increased demands on fire protection services caused by the proposed Project will require a detailed analysis in the EIR. As such, and in accordance with Public Resources Code section 21080.4(a) and State CEQA Guidelines section 15082(b), the Fire District has compiled the following list of critical concerns that it requests be addressed in the scope and content of the CRWSP EIR. It is essential that these concerns are adequately addressed in the EIR to ensure that the level of fire protection services being provided by the Fire District to already-established areas of the community are not compromised by the Project.

38075.00001\29727822.2



BEST BEST & KRIEGER
ATTORNEYS AT LAW

John B. Anderson, Project Planner
April 21, 2017
Page 3

arrangements, to ensure equipment, staffing, and facilities for emergency medical services, urban search and rescue, hazardous materials emergency response, and other relevant needs. Absent this, the EIR must require all feasible mitigation necessary to reduce the impact of insufficient staffing to a less than significant level.

- Per City General Plan Policy PUBLIC-7.5, the EIR should include a traffic analysis supported by substantial evidence that includes a determination as to whether the controlled ingress and egress at the proposed fire station location will assist in meeting the response times stated in City General Plan Policy PUBLIC-7.5. Also, per City General Plan Policy PUBLIC-7.5, the EIR must confirm that the emergency response system is capable of achieving the following standards in 95% of all cases: first fire emergency response unit within six minutes of dispatch; full alarm assignment within 10 minutes of dispatch; and second alarm assignment within 15 minutes of dispatch. Absent this, the EIR must require all feasible mitigation necessary to ensure that, with operation of the Project, adequate response times can be met.
- The EIR should include an assessment of current and proposed capital fee structures needed to effectively support the construction of a new fire station and equipment needs for the CRWSP area. Absent such information, the EIR must require all feasible mitigation necessary to ensure that a new fire station and the equipment needs of the CRWSP area can be funded.
- The EIR should include confirmation, supported by substantial evidence, that water supplies for fire protection will meet or exceed the requirements established in the City's General Plan, City standards, and applicable building and fire codes. Absent such information, the EIR must require all feasible mitigation necessary to ensure that adequate water supplies will be provided.
- The EIR should include confirmation, supported by substantial evidence, that all proposed structures within the CRWSP area will be constructed to meet all applicable building and fire codes.
- The EIR should include confirmation, supported by substantial evidence, that that Project roadways will meet or exceed the requirements for fire apparatus access based on the City's standards and applicable building and fire codes.

Additionally, to assist in identifying potential mitigation measures, the Fire District has initiated negotiations with financial and planning consultants to develop the requested Fire



BEST BEST & KRIEGER
ATTORNEYS AT LAW

John B. Anderson, Project Planner
April 21, 2017
Page 2

- Per City General Plan Policy PUBLIC-7.1, the EIR must confirm that the Project will have adequate fire flow pressure in relation to structure size, design, requirements for construction, and/or built-in fire protection systems. Absent that, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- Per City General Plan Policy PUBLIC-7.2, the EIR must confirm that that the Project infrastructure can ensure a minimum fire flow pressure of 1,500 GPM (sustainable for at least two hours) for residential use and a minimum fire flow pressure of 3,600 GPM (sustainable for longer periods) for larger residences and other building types, depending on the particular use and structure characteristics. Absent that, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- Per City General Plan Policy PUBLIC-7.3, the EIR must confirm that the Project will include a location for a new fire station to ensure the appropriate level of service (including adequate response time per Policy PUBLIC-7.5), community compatibility, and efficiency. The NOP states that a one-acre parcel has been designated for the proposed fire station at the corner of Crawford and Oakdale Road. However, the Fire District preliminarily estimates that a minimum 1.25-acre site may be needed to meet the District's needs. Similar projects we have evaluated have provided a site capable of encompassing 20 parking stalls, 4,000 square feet of administrative office space, and a 6,000 square foot fire station. The Fire District believes a further assessment by the City regarding the necessary lot size to accommodate the functions of the proposed fire station is required. Absent the Project's provision of an adequately sized site for a new fire station, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- As required by City General Plan Policy PUBLIC-7.5, the EIR should include the results of a response survey to verify that the proposed location of the new fire station will meet response times within the established limits. If the survey shows that the proposed location will not meet response times within the established limits the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- The EIR should include the results of a staffing survey to identify the impacts to the existing staffing levels and proposed staffing needs in the CRWSP area, and per City General Plan Policy PUBLIC-7.4, include substantial evidence reflecting coordination with fire protection providers, including through reciprocity



BEST BEST & KRIEGER
ATTORNEYS AT LAW

John B. Anderson, Project Planner
April 21, 2017
Page 4

District Master Plan and establishment of a new capital fee structure for the CRWSP area, both of which are referenced in the NOP.

As previously stated in the Fire District's July 25, 2016 letter to City Manager Jill Anderson, the Fire District remains committed to collaborating and working cooperatively with the City on the future development of the CRWSP area. To ensure this is a deliberative process, the Fire District will extend an invitation to City Administration to attend the next Crossroads West Ad Hoc Committee meeting.

The Fire District is committed to providing the highest level of fire protection services to the citizens of the City. In this letter, we have attempted to focus primarily on the areas of analysis that we believe will be necessary to ensure an EIR that discloses and evaluates the full range of potential impacts to fire protection services. We do, however, reserve the right to raise other concerns as the EIR is developed. We appreciate your consideration of the Fire District's comments on the NOP and Initial Study, and we look forward to your responses to the comments and to engaging in review of the Draft EIR when it is prepared.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Diaz', written over a horizontal line.

Christopher J. Diaz
for BEST BEST & KRIEGER LLP

cc: Stanislaus Consolidated Fire Protection District Board of Directors



SYLVAN UNION SCHOOL DISTRICT

605 SYLVAN AVENUE ✦ MODESTO, CA 95350 ✦ (209) 574-5000 ✦ FAX: (209) 524-2672

www.sylvan.k12.ca.us

April 11, 2017

DEBRA M. HENDRICKS
Superintendent
dhendricks@sylvan.k12.ca.us

City of Riverbank
Attn: John B. Anderson, Planner
6707 3rd Street South Hall
Riverbank, CA 95367

BOARD OF TRUSTEES

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Board President

CYNTHIA LINDSEY
Vice President

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Member

GEORGE RAWE
Member

JENNIFER MIYAKAWA
Member

Re: Notice of Preparation of an Environmental Impact Report for the
Crossroads West Specific Plan

Dear Mr. Anderson:

Sylvan Union School District staff has reviewed the information provided for the above referenced project. The following concerns are submitted:

1. Placement of the school. The placement of an elementary and a middle school should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
2. The district provided a map of 3 different preferred areas within the specific plan for schools per your request on April 21, 2016, but the school designation in this document does not reflect the requested change.
3. 30 acres of land are needed to build one elementary school (10 acres) and one middle school (20 acres). (See attached map)
4. Schools must not be planned in areas that require environmental remediation.
5. The project may yield housing units beyond the district's busing policy of 1 mile for elementary students and 2 miles for middle school students. Therefore, please insure that provisions are provided to establish suitable (safe) school bus stops for the area.
6. Based on the Land Use Designation and units per acre provided on page 3 and 4 of the report, and based on student yield factor from our Developer Fee Justification Study, the projected number of students projected is:
 - Elementary 668 students (TK-5th Grade)
 - Middle School 369 additional Riverbank Students (Grades 6, 7, 8)
 - Currently there are 483 middle school students residing in Riverbank, projecting a total middle school enrollment of 852 students.

Thank you for the opportunity to provide input. If you have any questions or comments, please contact Yvonne Perez, Assistant Superintendent of Business Services at (209) 574-5000 ext 233.

Sincerely,


Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees

Our Mission:

To provide a dynamic, broad-based education that prepares each child to be a contributing member of society.



LAND USE DATA

- LOW-DENSITY RESIDENTIAL (LDR) - 0-8 DU/Acre³
- MEDIUM DENSITY RESIDENTIAL (MDR) - 8-16 DU/Acre
- HIGH DENSITY RESIDENTIAL (HDR) - 16+ DU/Acre
- REGIONAL SPORTS PARK (P)
- MIXED USE¹ (MU)
- MIXED USE² (MU)
- COMMUNITY COMMERCIAL (CC)
- K-5 SCHOOL (S)
- PUBLIC/QUASI-PUBLIC (PQ)
- PARK/BASIN (P)
- ARTERIALS, COLLECTORS AND LOCAL STREETS

Acres	DU's	Average DU/Acre	S.F.
226	1,356	6	-
20	240	12	-
12	300	25	-
22	-	-	-
3.5	80	23	-
5	50	10	25,000
58.4	174	-	500,000
12	-	-	-
1.4	-	-	-
17.5	-	-	-
24.6	-	-	-
390.4¹	2,200		525,000

LEGEND/NOTES

- ACCESS POINTS FOR COMMERCIAL
- EXISTING TRAFFIC SIGNALS
- K-5 SCHOOL³ (S)
- ACTIVE ADULT²
- FUTURE MIDDLE SCHOOL EXPANSION
- BIKE TRAIL
- STORM DISCHARGE

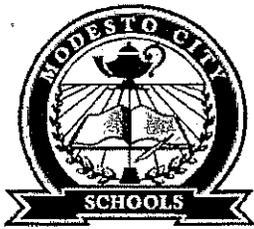
NOTES:

- ¹ Total acreage does not include the existing Right-of-Ways for the MID Main Canal, Oakdale Road, MID Lateral 6, or Claribel Road
- ² Active Adult is allowed anywhere within the LDR zoning designation
- ³ The School location is a placeholder within the LDR zone.



Figure 4 – Proposed Crossroads West Land Use Map





April 18, 2017

John B. Anderson
Contract Planner
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

Board of Education

Sue Zwahlen
President

David Allan
Vice President

Chad Brown
Board Member

Steven Grenbeaux
Board Member

Cindy Marks
Board Member

Amy Elliott Neumann
Board Member

John Walker
Board Member

Re: Response to Notice of Preparation, Crossroads West Specific Plan

Dear Mr. Anderson,

Thank you for the Notice of Preparation (NOP) to Modesto City Schools regarding the City of Riverbank's preparation of the EIR for the Crossroads West Specific Plan.

As we have identified in previous comments on the Specific Plan, Modesto City Schools (high school district grades 9-12) and Sylvan Union School District (elementary district K-8) will serve the Crossroads West area.

Both Modesto City Schools and Sylvan Union School District will have potentially significant impacts from the Specific Plan Area due to increased demand for public services, K-12 school capacities.

According to the NOP, the following impacts, at build out, of Crossroads West, specific to the Modesto City Schools, high schools are as follows.

- 1,872 low density units will generate 329 additional high school students, based on a .176 student generation rate.
- 192 medium density housing units will generate 34 additional high school students, based on a .176 student generation rate.

The Crossroads West Specific Plan area is currently in the Beyer High School attendance area. Please note the Board of Education may change high school attendance boundaries to accommodate enrollment at any time.

- Busing policy for high school students begins at the three mile distance from the school of attendance. Some of the southerly portions of the Specific Plan area may be within walking distance to Beyer High School, but most will require busing.



Modesto City Schools
426 Locust Street
Modesto California
95351
209.574.1500
www.mcs4kids.com

As a result, please consider the need for appropriate school bus transportation in the circulation plan as well as school bus stops.

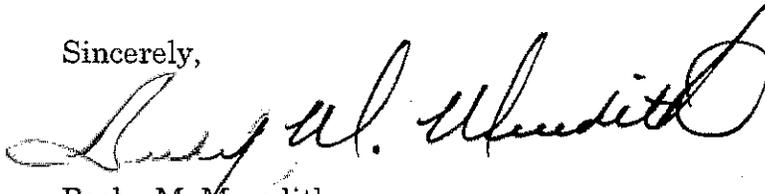
Beyer High School is at approximately 75% capacity. However, some of this capacity comes from relocatable buildings that are well past their useful lives and may be removed from this campus. Enochs High School is at approximately 90% capacity.

- A funding plan for school capital facilities to accommodate growth, that includes both the high school District and the Sylvan Union School District, should be prepared.

Modesto City Schools and Sylvan Union School District plan to work together with you and the proponents of Crossroads West for mutually acceptable solutions to these expected impacts.

Thank you for the opportunity to comment. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Becky M. Meredith
Senior Director, Business Services
Modesto City Schools
426 Locust Street
Modesto, CA 95351
209.492.5002

CALLS
04/19 @ 10:30 AM

c: Pam Able, Superintendent, Modesto City Schools
Debra Hendricks, Superintendent, Sylvan Union School District
Yvonne Perez, Assistant Superintendent, Sylvan Union School District



City of Modesto
Community and Economic
Development Department/Planning Division
1010 Tenth Street, Third Floor
Modesto, CA 95354

April 19, 2017

John B. Anderson
City of Riverbank
6707 3rd Street (South Hall)
Riverbank CA 95367

RE: Crossroads West Specific Plan EIR Notice of Preparation

Dear Mr. Anderson:

Thank you for the opportunity to provide comments regarding the subject Notice of Preparation. The City of Modesto understands that the City of Riverbank proposes to annex approximately 390 acres for development of the Crossroads West Specific Plan area. The City of Modesto offers the following comment.

The City of Modesto and the City of Riverbank share a common General Plan boundary along Claribel Road. The City of Modesto is concerned with future growth along the Claribel Road corridor, and impacts resulting from said future growth along the corridor and to intersecting roadways within Modesto's SOI. The City of Modesto provided comments on the original Crossroads project via letters dated July 11 and July 28, 2003. In those letters, we raised concerns related to impacts from the Crossroads project on the integrity of Claribel Road, the planned Expressway at the time of the Crossroads entitlement, and failure of the Crossroads EIR to fully evaluate and mitigate impacts upon the surrounding roadway network.

Claribel Road is currently a two-lane road that carries much more traffic than it was originally designed for. The facility presently operates at a Level of Service (LOS) E, and is forecast to deteriorate to LOS F if much-needed improvements are not made. Because traffic improvements were not adequately addressed by the Crossroads project, the City of Modesto seeks assurances that these same mistakes will not be repeated, and that all necessary traffic concerns, deficiencies and improvements will be addressed with this proposed Crossroads West project. The Crossroads West Specific Plan EIR must document the measures to be

John B. Anderson
April 19, 2017
Page 2

established by the City of Riverbank to ensure that adequate improvements are made to the existing roadway network in order to mitigate traffic-related impacts resulting from the proposed Project.

We appreciate the opportunity to submit our comments regarding the City Riverbank's NOP related to the proposed Crossroads West Specific Plan, EIR and annexation. If you have any questions regarding these comments, please feel free to contact Patrick Kelly, Planning Manager, at 209.577.5268 or by email at pkelly@modestogov.com.

Sincerely,



Patrick Kelly, AICP
Planning Manager

- c. Joseph P. Lopez, Acting City Manager
Cynthia Birdsill, Director of Community & Economic Development

April 17, 2017

City of Riverbank
Attention: John B. Anderson
6707 3rd Street South Hall
Riverbank, CA 95367

RE: *Environmental Impact Report (EIR) for the Crossroads West Specific Plan*
Location: E/of Oakdale Rd, s/by Claribel Rd

Thank you for the opportunity to comment on this referral. Following are the recommendations from our Risk & Property, Electrical, Irrigation, and Domestic Water Divisions:

Irrigation

- Modesto Irrigation District (MID) operates an expansive system of canals, ditches, and pipelines which provide irrigation service to lands within its irrigation service area. The City of Riverbank's (City) proposed Crossroads West Specific Plan (Crossroads) area lies within MID's irrigation service area. Please see the attached project site map for clarification purposes. Planned urban development within MID's irrigation service area typically requires the upgrade and/or relocation of existing MID infrastructure to accommodate planned development.
- In general, MID won't allow for piecemeal facility relocation projects of its existing irrigation infrastructure and recommends pre-consultation with MID Civil Engineering staff during preliminary planning. The City's Crossroads West Specific Plan update must provide a regional approach to the proposed modifications and/or relocations of MID's existing infrastructure.
- While there may be additional project specific conditions, the below noted conditions of approval may apply to specific projects within the proposed Crossroads expansion. It should be noted that any and all project-specific conditions of approval are subject to change by MID.
 - No new stormwater discharges will be permitted into MID's irrigation infrastructure unless a Stormwater Discharge Agreement has been approved by the MID Board of Directors.
 - Stormwater infrastructure must be designed to meet required holding times during historical stormwater events and must meet water quality requirements set forth by MID.
 - Future stormwater discharge into the MID Main Canal is limited to the upper northwest corner of the proposed Crossroads area. Due to discharge limitations, discharge into MID's Main Canal may only be permitted downstream of the Hardy Weir. Please see the attached project site map for clarification purposes.
 - Future stormwater discharge into MID's Lateral No. 6 is also limited in capacity. Therefore, modification of the existing Crossroads MID Discharge Agreement as noted in the last paragraph on page 24 of the Crossroads West Specific Plan will need to be discussed with MID Civil Engineering Department staff.

- Due to limited capacity in MID's Main Canal and Lateral No. 6, MID requires all stormwater runoff north of the proposed Crawford Road be diverted to MID's Main Canal downstream of the Hardy Weir. All stormwater runoff south of the proposed Crawford Road must be diverted into MID's Lateral No. 6.
- MID requires written recorded easements or Grant in Fee title for its irrigation and drainage infrastructure.
- MID won't allow irrigation infrastructure to be installed within roadways.
- Relocation of MID irrigation infrastructure to the benefit of the development must be coordinated and approved by MID. All costs associated with design, approval and analysis of relocations shall be at the Developer's expense.
- License Agreements are required for any existing encroachments or proposed improvements within the current or requested MID easement/right-of-way.
- No public access, such as pedestrian crossings, will be permitted within MID Lateral right-of-way.
- A bridge must be constructed for the proposed vehicle circulation across MID's Lateral No. 6.
- The Developer should provide private irrigation and drainage easements as necessary to insure that existing irrigation customers maintain access to necessary irrigation and drainage infrastructure.
- MID will require a Facility Modification Agreement before any work can be done on MID irrigation infrastructure.
- MID requires the installation of a six (6) foot tall solid masonry wall, or MID pre-approved equivalent, prior to any development adjacent to MID Laterals.
- The Developer must provide drainage for stormwater runoff that may accumulate between MID's Lateral(s) and the MID-required six foot tall solid masonry wall.
- MID will require the Developer to submit to MID's Civil Engineering Department the proposed plans, MID's *Application for Land Development Project Review* form, and the respective fees as noted on the Application.
- All work that may affect irrigation facilities must occur during the non-irrigation season (typically November 1 to March 1). Irrigation service must not be interrupted.

Domestic Water/Risk & Property

- No comments at this time.

Electrical

- The attached map shows the approximate location of the District's existing electrical facilities in the project area.
- In conjunction with related site/road improvement requirements, existing overhead and underground electric facilities within or adjacent to the proposed plan shall be protected, relocated or removed as required by the District's Electric Engineering Department. Appropriate easements for electric facilities shall be granted when specific areas are developed.

- Relocation or Installation of electric facilities shall conform to the District's Electric Service Rules.
- Costs for relocation and/or undergrounding the District's electrical facilities at the request of others will be borne by the requesting party. Estimates for relocating or undergrounding existing facilities will be supplied upon request.
- MID currently has existing overhead 69,000 volt and 12,000 volt electric facilities within and adjacent to the subject area and prefers to maintain the existing overhead electrical facilities, where practical, due to economic, reliability and operating concerns. Existing and future 69,000 volt overhead lines cannot be installed underground. MID reserves the right to install new 69,000 volt overhead electrical facilities along any street for the purpose of maintaining a reliable electric system and servicing future development associated with future expansion into undeveloped land.
- A 10' PUE is required along all existing and proposed street frontages.
- MID requires a 15' PUE along all properties that are adjacent to road Right-of-Way and have overhead high voltage electric transmission and distribution lines adjacent to them. These easements are necessary in order to protect the existing overhead high voltage lines and maintain necessary safety clearances.
- The Modesto Irrigation District reserves its future right to utilize its property, including the MID canals in a manner it deems necessary for the installation and maintenance of overhead or underground electric and telecommunication facilities. These needs, which have not yet been determined, may consist of new towers, poles, cross arms, wires, cables, braces, insulators, transformers, service lines, control structures and any necessary appurtenances, as may in the District's opinion, be necessary or desirable. Maintain a minimum 20 ft. clearance adjacent to the existing 69,000 volt and 12,000 volt overhead lines along MID Lateral No. 6
- Electric service to individual parcels within the proposed Specific Plan may not be available at this time. Customers should contact the District's Electric Engineering Department when parcels are ready for development.

The Modesto Irrigation District reserves its future rights to utilize its property, including its canal and electrical easements and rights-of-way, in a manner it deems necessary for the installation and maintenance of electric, irrigation, agricultural and urban drainage, domestic water and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, crossarms, wires, cables, braces, insulators, transformers, service lines, open channels, pipelines, control structures and any necessary appurtenances, as may, in District's opinion, be necessary or desirable.

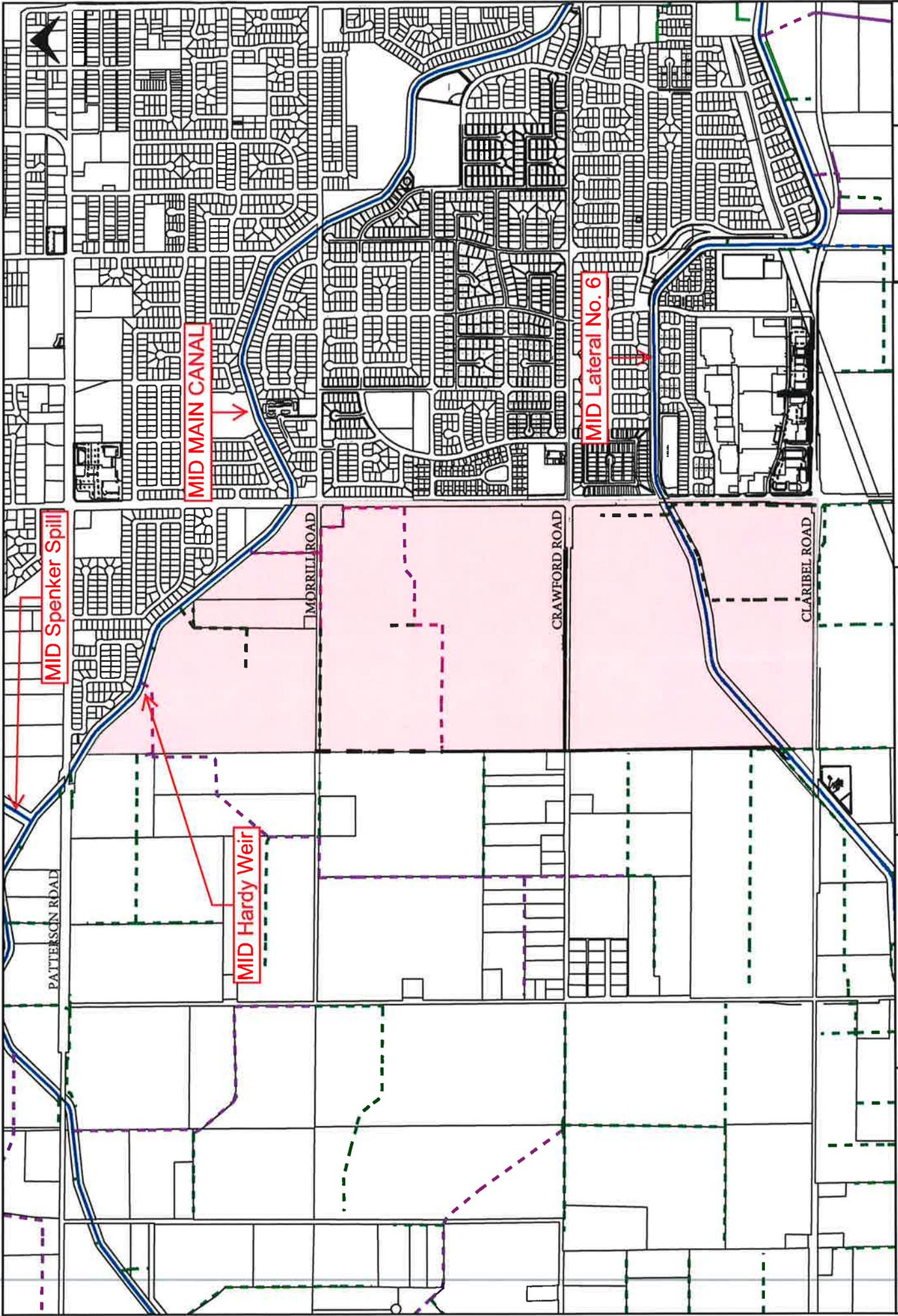
If you have any questions, please contact me at 526-7447.

Sincerely,



Lien Campbell
Risk & Property Analyst

Copy: DeNovo Planning Group, Attention: Steve McMurtry
File



MID Spenker Spill

MID MAIN CANAL

MID Hardy Weir

MID Lateral No. 6

MERRILL ROAD

CRAWFORD ROAD

CLARIBEL ROAD

PATTERSON ROAD



LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral

Irrigation Operations
Project Site Map

0feet 60feet 120feet 180feet 240feet



This GIS map was created by the Modesto Irrigation District's Geographic Information System and is not intended to replace a site survey. An independent verification of all data contained herein should be obtained. The GIS data or cartographic digital files contained herein are not a legal representation of any of the features that they depict. The Modesto Irrigation District does not warrant the accuracy or completeness of its GIS map products and therefore disclaims all liability for their fitness of use. No decision involving a risk of economic loss or physical injury should be made in reliance thereon.

DATE: 4/17/2017

W.O. NO:

PROJECT:

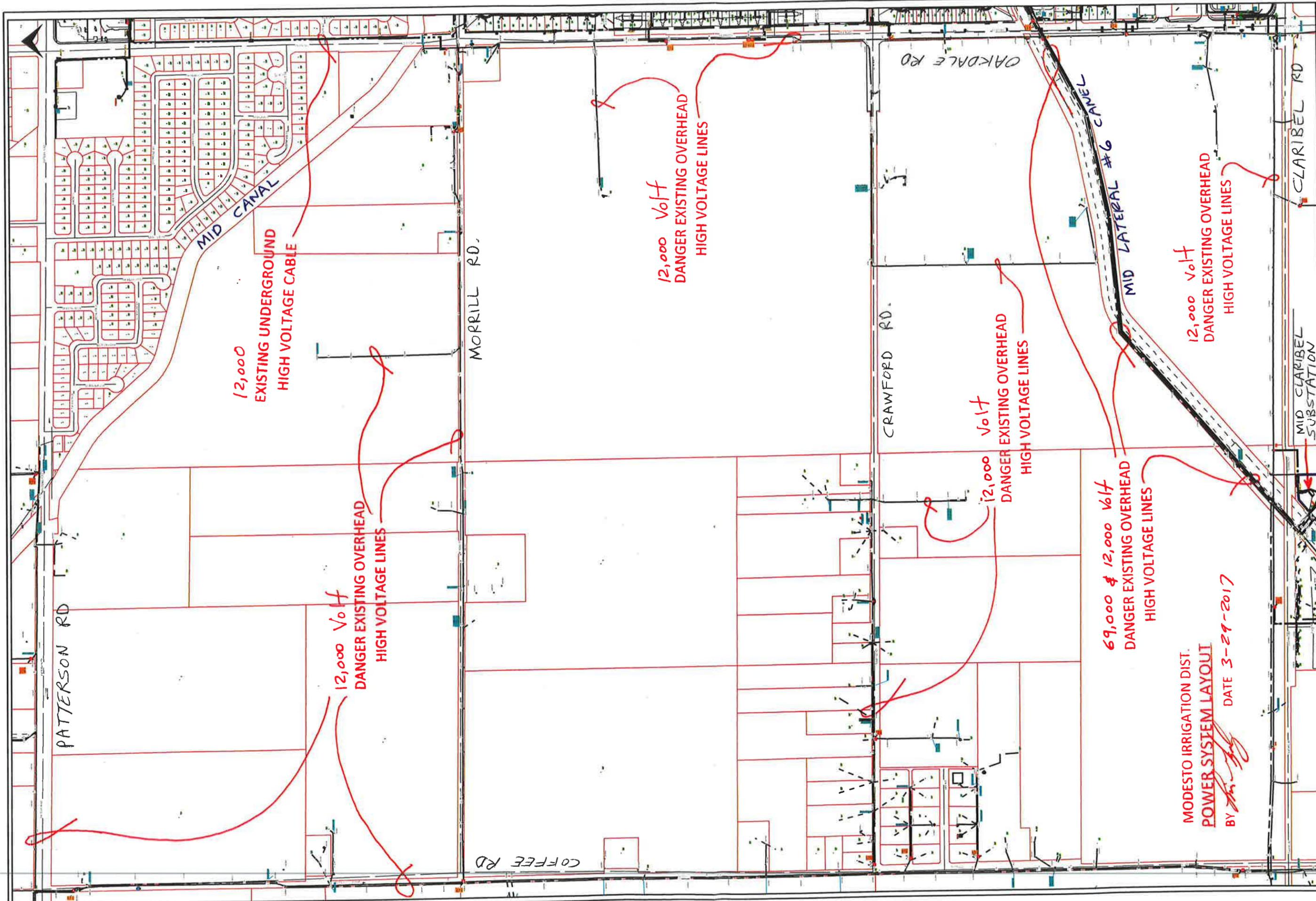
TAG NO:

DWG BY: S. SAVY

APP BY:

APP BY:

PAGE: 1 OF 1



MODESTO IRRIGATION DIST.
 POWER SYSTEM LAYOUT
 BY *[Signature]*
 DATE 3-29-2017

69,000 & 12,000 Volt
 DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

12,000 Volt
 DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

12,000 Volt
 DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

12,000
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

12,000 Volt
 DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES



NO.	REVISION	DATE

CROSSROADS WEST SPECIFIC PLAN

Riverbank

DWG BY: jousig	DATE: 03/28/2017	200feet
APP. BY:	W.O. NO.:	1600feet
APP. BY:	PROJECT:	1200feet
PAGE: 1 OF 1	TAG NO.:	800feet

April 18, 2017

City of Riverbank
Attention: John B. Anderson
6707 3rd Street South Hall
Riverbank, CA 95367

RE: Notion of Preparation and Initial Study (NOP/IS)
Location: City of Riverbank city limits to the North & East

Thank you for the opportunity to comment on this referral. Following are the recommendations from our Risk & Property, Electrical, Irrigation, and Domestic Water Divisions:

Irrigation

- Modesto Irrigation District (MID) operates an expansive system of canals, ditches, and pipelines which provide irrigation service to lands within its irrigation service area. The City of Riverbank's (City) proposed Crossroads West Specific Plan (Crossroads) area lies within MID's irrigation service area. Please see the attached project site map for clarification purposes. Planned urban development within MID's irrigation service area typically requires the upgrade and/or relocation of existing MID infrastructure to accommodate planned development.
- In general, MID won't allow for piecemeal facility relocation projects of its existing irrigation infrastructure and recommends pre-consultation with MID Civil Engineering staff during preliminary planning. The City's Crossroads West Specific Plan update must provide a regional approach to the proposed modifications and/or relocations of MID's existing infrastructure.
- While there may be additional project specific conditions, the below noted conditions of approval may apply to specific projects within the proposed Crossroads expansion. It should be noted that any and all project-specific conditions of approval are subject to change by MID.
 - No new stormwater discharges will be permitted into MID's irrigation infrastructure unless a Stormwater Discharge Agreement has been approved by the MID Board of Directors.
 - Stormwater infrastructure must be designed to meet required holding times during historical stormwater events and must meet water quality requirements set forth by MID.
 - Future stormwater discharge into the MID Main Canal is limited to the upper northwest corner of the proposed Crossroads area. Due to discharge limitations, discharge into MID's Main Canal may only be permitted downstream of the Hardy Weir. Please see the attached project site map for clarification purposes.
 - Future stormwater discharge into MID's Lateral No. 6 is also limited in capacity. Therefore, modification of the existing Crossroads MID Discharge Agreement as noted in the last paragraph on page 24 of the Crossroads West Specific Plan will need to be discussed with MID Civil Engineering Department staff.

- Due to limited capacity in MID's Main Canal and Lateral No. 6, MID requires all stormwater runoff north of the proposed Crawford Road be diverted to MID's Main Canal downstream of the Hardy Weir. All stormwater runoff south of the proposed Crawford Road must be diverted into MID's Lateral No. 6.
- MID requires written recorded easements or Grant in Fee title for its irrigation and drainage infrastructure.
- MID won't allow irrigation infrastructure to be installed within roadways.
- Relocation of MID irrigation infrastructure to the benefit of the development must be coordinated and approved by MID. All costs associated with design, approval and analysis of relocations shall be at the Developer's expense.
- License Agreements are required for any existing encroachments or proposed improvements within the current or requested MID easement/right-of-way.
- No public access, such as pedestrian crossings, will be permitted within MID Lateral right-of-way.
- A bridge must be constructed for the proposed vehicle circulation across MID's Lateral No. 6.
- The Developer should provide private irrigation and drainage easements as necessary to insure that existing irrigation customers maintain access to necessary irrigation and drainage infrastructure.
- MID will require a Facility Modification Agreement before any work can be done on MID irrigation infrastructure.
- MID requires the installation of a six (6) foot tall solid masonry wall, or MID pre-approved equivalent, prior to any development adjacent to MID Laterals.
- The Developer must provide drainage for stormwater runoff that may accumulate between MID's Lateral(s) and the MID-required six foot tall solid masonry wall.
- MID will require the Developer to submit to MID's Civil Engineering Department the proposed plans, MID's *Application for Land Development Project Review* form, and the respective fees as noted on the Application.
- All work that may affect irrigation facilities must occur during the non-irrigation season (typically November 1 to March 1). Irrigation service must not be interrupted.

Domestic Water/Risk & Property

- No comments at this time.

Electrical

- The attached drawings are marked showing the approximate location of the District's existing electrical facilities.
- In conjunction with related site improvement requirements, existing overhead and underground electric facilities within or adjacent to the proposed development shall be protected, relocated or removed as required by the District's Electric Engineering Department. Appropriate easements for relocation of electric facilities shall be granted as required.

- Costs for relocation and/or undergrounding the Districts facilities at the request of others will be borne by the requesting party. Estimates for relocating or undergrounding existing facilities will be supplied upon request.
- Relocation or Installation of electric facilities shall conform to the Districts Electric Service Rules.
- A 15' clearance shall be maintained adjacent to the existing 12kv overhead high voltage lines in order to protect the existing electric facilities and to maintain necessary safety clearances.
- A 10' PUE is required along all existing and proposed street frontages. The easements are required to protect the overhead and underground electric facilities and maintain necessary safety clearances.
- High voltage 69,000 volt and 12,000 volt overhead/underground lines and overhead/underground secondary cables are located along Oakdale Rd, Claribel Rd, Morrill Rd and within the project area. Extreme caution should be taken when operating heavy equipment, using a crane, backhoes, hand held tools or any other type of equipment near the underground and overhead high voltage electric facilities.
- The Modesto Irrigation District reserves its future right to utilize its property, including the MID canal adjacent to PARCEL 074-014-006, in a manner it deems necessary for the installation of electric and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, high voltage electric overhead lines, cross arms, braces, insulators, transformers, service lines, control structures and any necessary appurtenances, as may, in the District's opinion, be necessary or desirable.
- Any specific issues related to high density residential development will be addressed when construction projects are submitted for review.
- Customer should contact the District's Electric Engineering Department attention Linh Nguyen at (209) 526-7438 if additional information is required. Additional easements may be required with development of this project.

The Modesto Irrigation District reserves its future rights to utilize its property, including its canal and electrical easements and rights-of-way, in a manner it deems necessary for the installation and maintenance of electric, irrigation, agricultural and urban drainage, domestic water and telecommunication facilities. These needs, which have not yet been determined, may consist of poles, crossarms, wires, cables, braces, insulators, transformers, service lines, open channels, pipelines, control structures and any necessary appurtenances, as may, in District's opinion, be necessary or desirable.

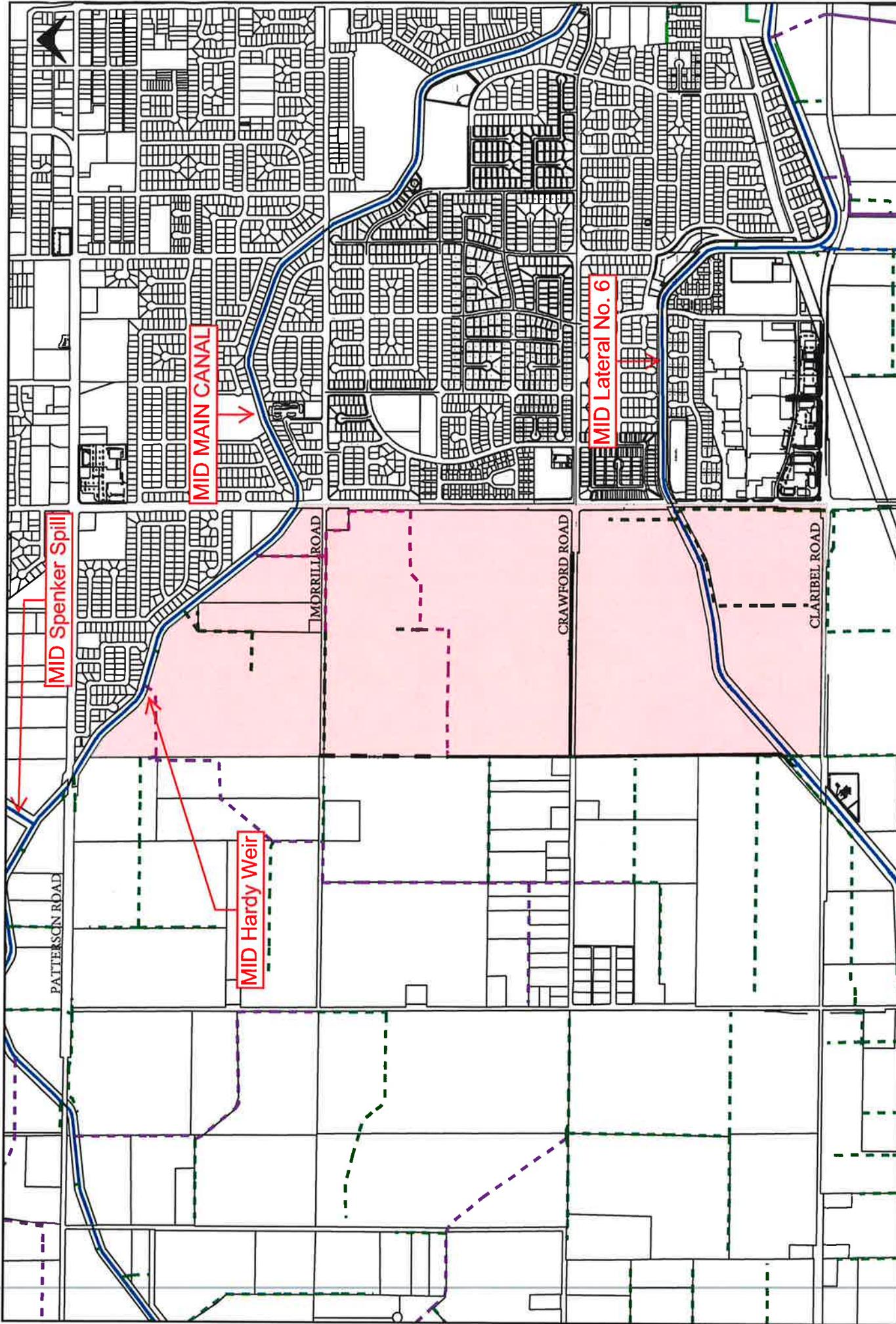
If you have any questions, please contact me at 526-7447.

Sincerely,



Lien Campbell
Risk & Property Analyst

Copy: File



MID Spenker Spill

MID MAIN CANAL

MID Hardy Weir

MID Lateral No. 6

PATTERSON ROAD

MERRILL ROAD

CRAWFORD ROAD

CLARIBEL ROAD

LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral



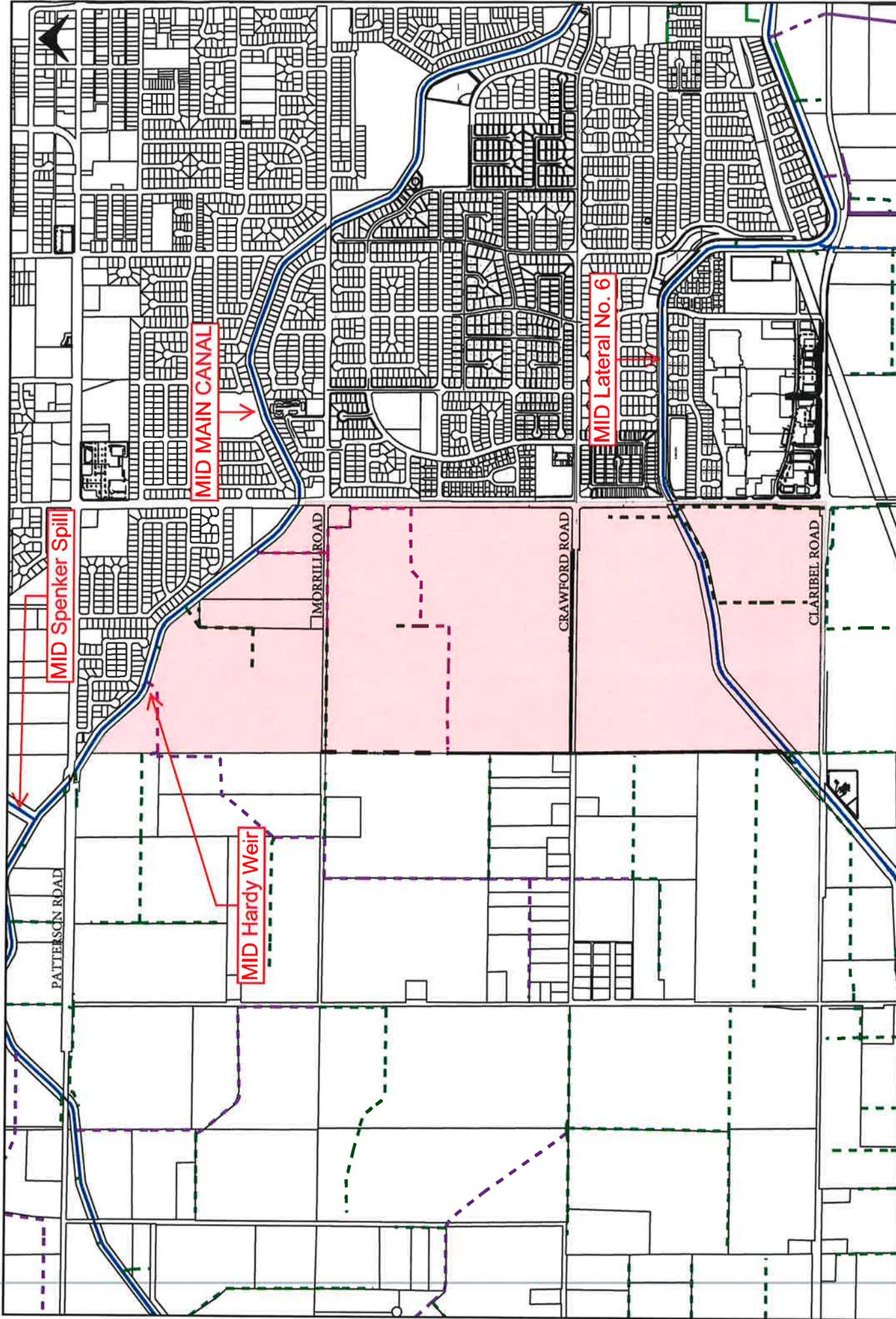
Irrigation Operations

Project Site Map

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DATE: 4/17/2017	DWG BY: S. SAVY
W.O. NO:	APP. BY:
PROJECT:	APP. BY:
TAG NO:	PAGE: 1 OF 1





MID Spenker Spill

MID MAIN CANAL

MID Lateral No. 6

MID Hardy Weir

MIDRRILL ROAD

CRAWFORD ROAD

CLARIBEL ROAD

PATTERSON ROAD

DWG BY: S. SAVY	DATE: 4/17/2017
APP. BY:	W.O. NO:
APP. BY:	PROJECT:
PAGE: 1 OF 1	TAG NO:

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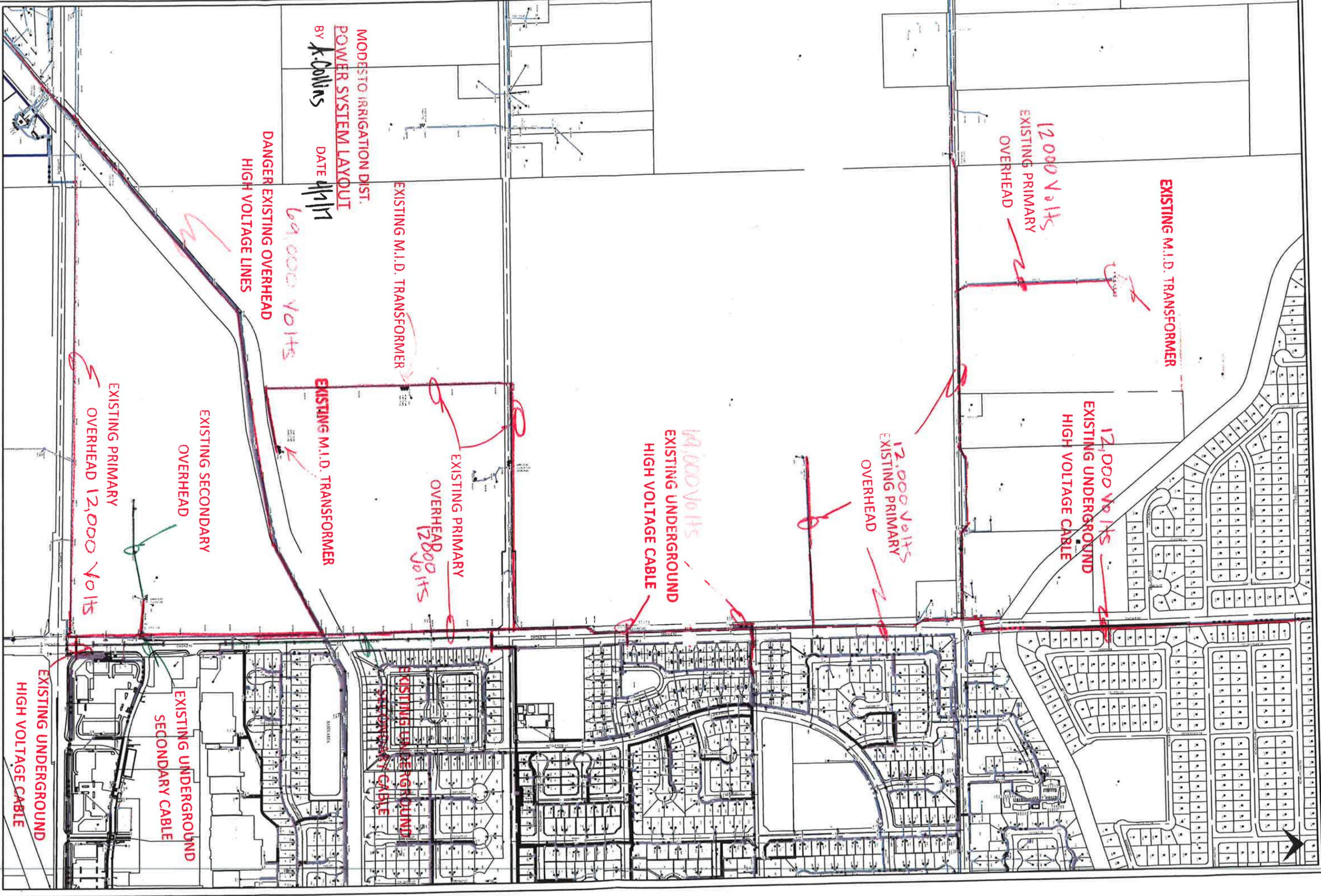
Irrigation Operations
Project Site Map

0feet 600feet 1200feet 1800feet 2400feet

LEGEND

- Proposed Crossroads West
- Improvement District Pipeline
- Private Pipeline
- Private Ditch
- MID Lateral





MODESTO IRRIGATION DIST.
POWER SYSTEM LAYOUT
 BY *K. Collins*
 DATE *4/1/17*

EXISTING M.I.D. TRANSFORMER

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

12,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

14,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

EXISTING M.I.D. TRANSFORMER

EXISTING PRIMARY
 OVERHEAD
12,000 Volts

EXISTING M.I.D. TRANSFORMER

DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

69,000 Volts

EXISTING PRIMARY
 OVERHEAD
12,000 Volts

EXISTING SECONDARY
 OVERHEAD

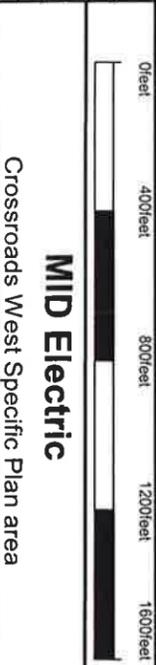
EXISTING UNDERGROUND
 SECONDARY CABLE

EXISTING UNDERGROUND
 SECONDARY CABLE

EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

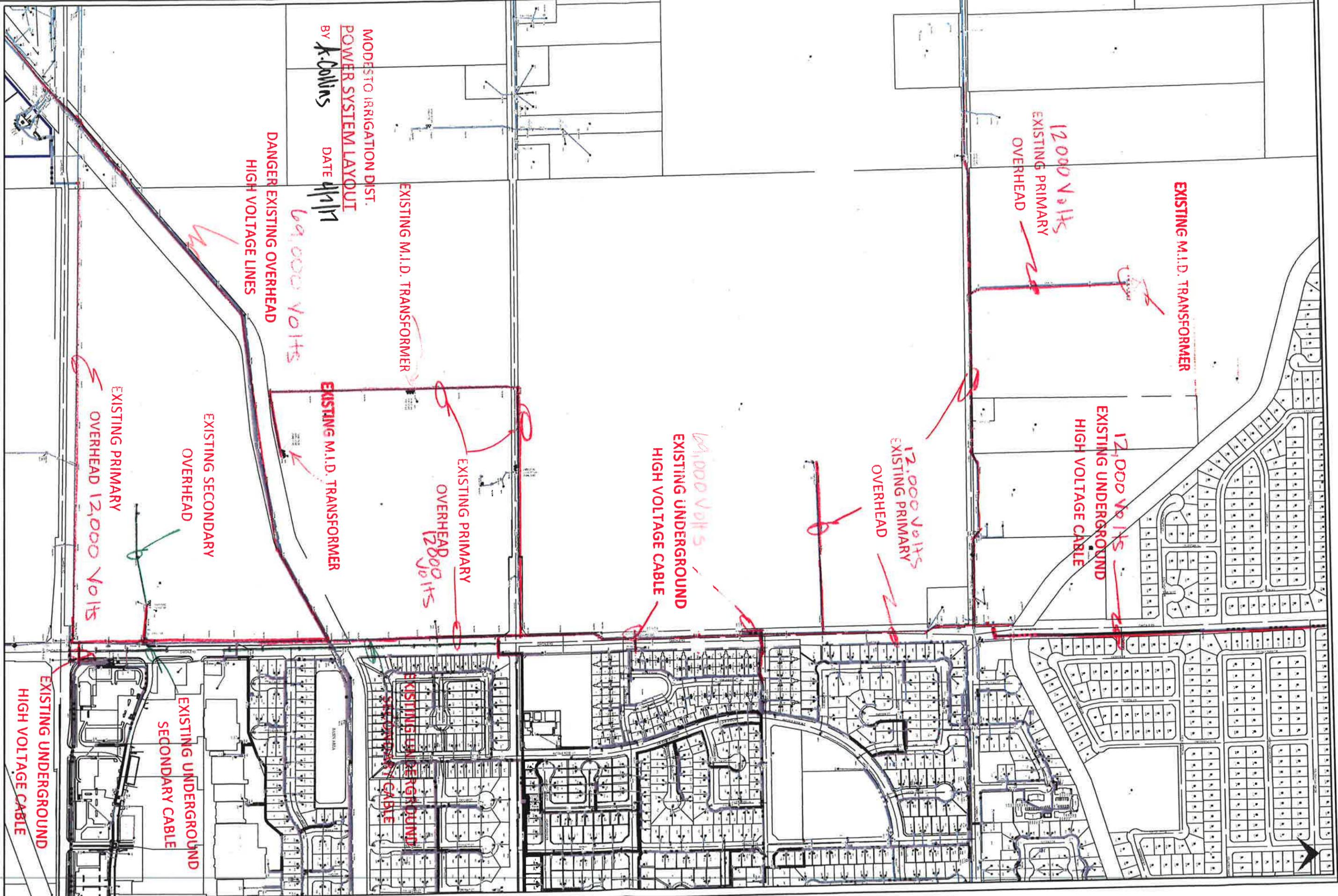


NO.	REVISION	DATE



DATE: 04/06/2017	DWG BY: Amundahl0713
W.O. NO:	APP BY:
PROJECT:	APP BY:
TAG NO:	PAGE: 1 OF 1

MID Electric
 Crossroads West Specific Plan area



MODESTO IRRIGATION DIST.
POWER SYSTEM LAYOUT
 BY *K. Collins*
 DATE *4/1/17*

EXISTING M.I.D. TRANSFORMER

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

12,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

12,000 Volts
 EXISTING PRIMARY
 OVERHEAD

69,000 Volts
 EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE

EXISTING M.I.D. TRANSFORMER

EXISTING PRIMARY
 OVERHEAD
12,800 Volts

EXISTING M.I.D. TRANSFORMER

DANGER EXISTING OVERHEAD
 HIGH VOLTAGE LINES

EXISTING SECONDARY
 OVERHEAD

EXISTING PRIMARY
 OVERHEAD
12,000 Volts

EXISTING UNDERGROUND
 SECONDARY CABLE

EXISTING UNDERGROUND
 HIGH VOLTAGE CABLE



NO.	REVISION	DATE



DATE: 04/06/2017
 W.O. NO.:
 PROJECT:
 TAG NO:

MID Electric
 Crossroads West Specific Plan area

DWG. BY: *Amend/DJT*
 APP. BY:
 APP. BY:
 PAGE: 1 OF 1



April 18, 2017

John B. Anderson
Contract Planner
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

Board of Education

Sue Zwahlen
President

David Allan
Vice President

Chad Brown
Board Member

Steven Grenbeaux
Board Member

Cindy Marks
Board Member

Amy Elliott Neumann
Board Member

John Walker
Board Member

Re: Response to Notice of Preparation, Crossroads West Specific Plan

Dear Mr. Anderson,

Thank you for the Notice of Preparation (NOP) to Modesto City Schools regarding the City of Riverbank's preparation of the EIR for the Crossroads West Specific Plan.

As we have identified in previous comments on the Specific Plan, Modesto City Schools (high school district grades 9-12) and Sylvan Union School District (elementary district K-8) will serve the Crossroads West area.

Both Modesto City Schools and Sylvan Union School District will have potentially significant impacts from the Specific Plan Area due to increased demand for public services, K-12 school capacities.

According to the NOP, the following impacts, at build out, of Crossroads West, specific to the Modesto City Schools, high schools are as follows.

- 1,872 low density units will generate 329 additional high school students, based on a .176 student generation rate.
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The Crossroads West Specific Plan area is currently in the Beyer High School attendance area. Please note the Board of Education may change high school attendance boundaries to accommodate enrollment at any time.

- Busing policy for high school students begins at the three mile distance from the school of attendance. Some of the southerly portions of the Specific Plan area may be within walking distance to Beyer High School, but most will require busing.



Modesto City Schools
426 Locust Street
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95351
209.574.1500
www.mcs4kids.com

As a result, please consider the need for appropriate school bus transportation in the circulation plan as well as school bus stops.

Beyer High School is at approximately 75% capacity. However, some of this capacity comes from relocatable buildings that are well past their useful lives and may be removed from this campus. Enochs High School is at approximately 90% capacity.

- A funding plan for school capital facilities to accommodate growth, that includes both the high school District and the Sylvan Union School District, should be prepared.

Modesto City Schools and Sylvan Union School District plan to work together with you and the proponents of Crossroads West for mutually acceptable solutions to these expected impacts.

Thank you for the opportunity to comment. Please do not hesitate to contact me with any questions or concerns.

Sincerely,



Becky M. Meredith
Senior Director, Business Services
Modesto City Schools
426 Locust Street
Modesto, CA 95351
209.492.5002

c: Pam Able, Superintendent, Modesto City Schools
Debra Hendricks, Superintendent, Sylvan Union School District
Yvonne Perez, Assistant Superintendent, Sylvan Union School District



SYLVAN UNION SCHOOL DISTRICT

605 SYLVAN AVENUE ✦ MODESTO, CA 95350 ✦ (209) 574-5000 ✦ FAX: (209) 524-2672

www.sylvan.k12.ca.us

April 11, 2017

DEBRA M. HENDRICKS
Superintendent
dhendricks@sylvan.k12.ca.us

City of Riverbank
Attn: John B. Anderson, Planner
6707 3rd Street South Hall
Riverbank, CA 95367

BOARD OF TRUSTEES

TERRIANN ZEEK
Board President

CYNTHIA LINDSEY
Vice President

DAVID COLLINS
Member

GEORGE RAWE
Member

JENNIFER MIYAKAWA
Member

Re: Notice of Preparation of an Environmental Impact Report for the
Crossroads West Specific Plan

Dear Mr. Anderson:

Sylvan Union School District staff has reviewed the information provided for the above referenced project. The following concerns are submitted:

1. Placement of the school. The placement of an elementary and a middle school should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
2. The district provided a map of 3 different preferred areas within the specific plan for schools per your request on April 21, 2016, but the school designation in this document does not reflect the requested change.
3. 30 acres of land are needed to build one elementary school (10 acres) and one middle school (20 acres). (See attached map)
4. Schools must not be planned in areas that require environmental remediation.
5. The project may yield housing units beyond the district's busing policy of 1 mile for elementary students and 2 miles for middle school students. Therefore, please insure that provisions are provided to establish suitable (safe) school bus stops for the area.
6. Based on the Land Use Designation and units per acre provided on page 3 and 4 of the report, and based on student yield factor from our Developer Fee Justification Study, the projected number of students projected is:
 - Elementary 668 students (TK-5th Grade)
 - Middle School 369 additional Riverbank Students (Grades 6, 7, 8)
 - Currently there are 483 middle school students residing in Riverbank, projecting a total middle school enrollment of 852 students.

Thank you for the opportunity to provide input. If you have any questions or comments, please contact Yvonne Perez, Assistant Superintendent of Business Services at (209) 574-5000 ext 233.

Sincerely,

Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees

Our Mission:

To provide a dynamic, broad-based education that prepares each child to be a contributing member of society.

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



March 29, 2017

John Anderson
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

RE: SCH#2017032062, Crossroads West Specific Plan, Stanislaus County

Dear Mr. Anderson:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or

tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.

Elise Carroll

From: Steve McMurtry <smcmurtry@denovoplanning.com>
Sent: Monday, April 17, 2017 10:25 AM
To: 'Elise Carroll'
Subject: FW: Riverbank NOP/IS - Comment

Steve McMurtry, Principal
De Novo Planning Group
916-580-9818
www.denovoplanning.com

1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762

From: John Anderson [mailto:john@jbandersonplanning.com]
Sent: Monday, April 17, 2017 9:00 AM
To: 'Todd Whiteside' <toddwhiteside@hotmail.com>
Cc: Donna M. Kenney <dkenney@riverbank.org>; Steve McMurtry <smcmurtry@denovoplanning.com>
Subject: RE: Riverbank NOP/IS - Comment

Todd:

I received your message and will respond to your questions and comments shortly.

JBA

John B. Anderson
J.B. ANDERSON LAND USE PLANNING
139 S. Stockton Avenue
Ripon, CA 95366
PH: (209) 599-8377
Fax: (209) 599-8399

From: Todd Whiteside [mailto:toddwhiteside@hotmail.com]
Sent: Wednesday, April 12, 2017 8:17 PM
To: john@jbandersonplanning.com
Subject: Riverbank NOP/IS - Comment

John,

I'd like the EIR to address:

1. What happens with the new Crawford Road at the West most boundary
2. What happens at the boundary between new park and new residential and existing agriculture and existing ranchettes.

I think this boundary should be something like a block wall.

Best regards,

Todd

R. Todd Whiteside
1549 Crawford Road, 95357
h 209.571.1236 / c 209.605.6738

Elise Carroll

From: Elise Carroll <ecarroll@denovoplanning.com>
Sent: Friday, April 14, 2017 12:36 PM
To: 'Elise Carroll'
Subject: FW: SCOPING MEETING

From: rick kimble [<mailto:dockimble@att.net>]
Sent: Monday, April 03, 2017 8:01 PM
To: john@jbandersonplanning.com
Cc: Rick Kimble
Subject: SCOPING MEETING

Before undertaking yet another project I'd like to ascertain the condition of the city's infrastructure.

Do we have a waste water treatment plant capable of handling all these additional residents/businesses?

We can see the roads are in such disrepair adding more vehicles would be a joke.

How will the city address the public safety issues? We currently cannot get the police to respond to the simplest crimes. How will this improve with all these new buildings plus the additional hampering of the legalized marijuana burden?

Fire safety support available?

Can the current public works staff handle the additional work without increasing their size?

I'd also like to question the city's financial situation.

Has the city solved the disasters of the Del Rio restaurant and the Riverbank Industrial Complex? The issues concerning both of these promised "gold mines" have hampered the city for years.

The redevelopment of the downtown has not met the illusions of grandeur that the city council promised 5 years ago. How many pre-existing businesses are still around? Will this new project better that record?

Will this new project add more "meat" to our economy or will these be just more "service" jobs?

The city still dumps money and support into a park (Jacob Meters) that is neither located within the city limits nor the county limits but into the fanciful "sphere of influence". One of the highest crime areas in the SOI. Why do we think this new project will be any more beneficial?

In closing I'd like to see the city consolidate and complete all these hanging issues (and many others not mentioned in this comment note) before taking on more. A 20 year general plan is a unrealistic goal. Without a valid crystal ball who can predict what is in the future? Certainly not the city council. Yet that is what you are basing this new project on. Pitiful!

Rick Kimble

25 year resident of Riverbank who has seen more city council losses than wins.

April 21, 2017

John B. Anderson
City of Riverbank
6707 3rd Street South Hall
Riverbank, CA 95367

Project: Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Crossroads West Specific Plan Project

District CEQA Reference No: 20170345

Dear Mr. Anderson:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Notice of Preparation (NOP) for the Crossroads West Specific Plan (CWSP) Project. Per the NOP, the proposed project includes the development of up to 1,872 Low Density Residential (LDR) units, up to 192 Medium Density Residential (MDR) units, and up to 388 High Density Residential (HDR) units. The proposed project also includes up to 550,000 square feet of Mixed Use 1 (MU-1) uses and up to 27,000 square feet of Mixed Use 2 (MU-2) uses. Development in MU-1 could consist of a maximum of 550,000 square foot of retail uses and no residential uses or up to 350 units of residential uses and 360,000 square foot of retail uses. The proposed project is designed to provide flexibility so there are various other hypothetical combinations of retail and residential development, but not more than the maximum density presented would be allowed without an amendment approved by the City. Additionally, the proposed project would increase the size of the existing 11-acre Riverbank Sports Complex to 22 acres. A 10 to 12 acre elementary school is also proposed along with 42 acres of park, and open space uses The District offers the following comments:

Emissions Analysis

- 1) At the federal level for the National Ambient Air Quality Standards (NAAQS), the District is currently designated as extreme nonattainment for the 8-hour ozone standards; nonattainment for the PM_{2.5} standards; and attainment for the 1-Hour ozone, PM₁₀ and CO standards. At the state level, the District is currently designated as nonattainment for the 8-hour ozone, PM₁₀, and PM_{2.5} California

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Ambient Air Quality Standards (CAAQS). The District recommends that the Air Quality section of the Environmental Impact Report (EIR) include a discussion of the following impacts:

- a) **Criteria Pollutants:** Project related criteria pollutant emissions should be identified and quantified. The discussion should include existing and post-project emissions.
 - i) **Construction Emissions:** Construction emissions are short-term emissions and should be evaluated separate from operational emissions. The District recommends preparation of an Environmental Impact Report (EIR) if annual construction emissions cannot be reduced or mitigated to below the following levels of significance: 10 tons per year of oxides of nitrogen (NO_x), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM₁₀).
 - *Recommended Mitigation:* To reduce impacts from construction related exhaust emissions, the District recommends feasible mitigation for the project to utilize off-road construction fleets that can achieve fleet average emissions equal to or cleaner than the Tier III emission standards, as set forth in §2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 Code of Federal Regulations. This can be achieved through any combination of uncontrolled engines and engines complying with Tier III and above engine standards.
 - ii) **Operational Emissions:** Operational Emissions: Permitted (stationary sources) and non-permitted (mobile sources) sources should be analyzed separately. The District recommends preparation of an Environmental Impact Report (EIR) if the sum of annual permitted and the sum of the annual non-permitted emissions each cannot be reduced or mitigated to below the following levels of significance: 10 tons per year of oxides of nitrogen (NO_x), 10 tons per year of reactive organic gases (ROG), or 15 tons per year particulate matter of 10 microns or less in size (PM₁₀).
 - *Recommended Mitigation:* Project related impacts on air quality can be reduced through incorporation of design elements, for example, that increase energy efficiency, reduce vehicle miles traveled, and reduce construction exhaust related emissions. However, design elements and compliance with District rules and regulations may not be sufficient to reduce project related impacts on air quality to a less than significant level. Another example of a feasible mitigation measure is the mitigation of project emissions through a Voluntary Emission Reduction Agreement (VERA). The VERA is an instrument by which the project proponent provides monies to the District, which is used by the District to fund emission reduction projects that achieve the reductions required by the

lead agency. District staff is available to meet with project proponents to discuss a VERA for specific projects. For more information, or questions concerning this topic, please call District Staff at (559) 230-6000.

- iii) **Recommended Model:** Project related criteria pollutant emissions should be identified and quantified. Emissions analysis should be performed using CalEEMod (**C**alifornia **E**mission **E**stimator **M**odel), which uses the most recent approved version of relevant Air Resources Board (ARB) emissions models and emission factors. CalEEMod is available to the public and can be downloaded from the CalEEMod website at: www.caleemod.com.
- b) **Nuisance Odors:** The proposed project should be evaluated to determine the likelihood that the project would result in nuisance odors. Nuisance odors are subjective, thus the District has not established thresholds of significance for nuisance odors. Nuisance odors may be assessed qualitatively taking into consideration of project design elements and proximity to off-site receptors that potentially would be exposed objectionable odors.
- c) **Health Impacts:** Project related health impacts should be evaluated to determine if emissions of toxic air contaminants (TAC) will pose a significant health risk to nearby sensitive receptors. TACs are defined as air pollutants that which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. The most common source of TACs can be attributed to diesel exhaust fumes that are emitted from both stationary and mobile sources. Health impacts may require a detailed health risk assessment (HRA).

Prior to conducting an HRA, an applicant may perform a prioritization on all sources of emissions to determine if it is necessary to conduct an HRA. A prioritization is a screening tool used to identify projects that may have significant health impacts. If the project has a prioritization score of 10 or more, the project has the potential to exceed the District's significance threshold for health impacts of 20 in a million and an HRA should be performed.

If an HRA is to be performed, it is recommended that the project proponent contact the District to review the proposed modeling approach. The proposed project would be considered to have a significant health risk if the HRA demonstrates that project related health impacts would exceed the District's significance threshold of 20 in a million.

More information on TACs, prioritizations and HRAs can be obtained by:

- E-mailing inquiries to: hramodeler@valleyair.org; or
- Visiting the District's website at:
http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

- 2) In addition to the discussions on potential impacts identified above, the District recommends the EIR also include the following discussions:
 - a) A discussion of the methodology, model assumptions, inputs and results used in characterizing the project's impact on air quality. To comply with CEQA requirements for full disclosure, the District recommends that the modeling outputs be provided as appendices to the EIR. The District further recommends that the District be provided with an electronic copy of all input and output files for all modeling.
 - b) A discussion of the components and phases of the project and the associated emission projections, including ongoing emissions from each previous phase.
 - c) A discussion of project design elements and mitigation measures, including characterization of the effectiveness of each mitigation measure incorporated into the project.
 - d) A discussion of whether the project would result in a cumulatively considerable net increase of any criteria pollutant or precursor for which the San Joaquin Valley Air Basin is in non-attainment. More information on the District's attainment status can be found online by visiting the District's website at: <http://valleyair.org/aqinfo/attainment.htm>.

District Rules and Regulations

- 3) The proposed project may be subject to District rules and regulations, including: Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).
- 4) The proposed project may require District permits. Prior to the start of construction the project proponent should contact the District's Small Business Assistance Office at (209) 557-6446 to determine if an Authority to Construct (ATC) is required.
- 5) The proposed project would equal or exceed the relevant District Rule 9510 (Indirect Source Review) applicability threshold of 50 residential units, 2,000 square feet of commercial space, and 9,000 square feet of educational space. Therefore, the District concludes that the proposed project is subject to District Rule 9510.

Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees. If approval of the subject project constitutes the last discretionary approval by your agency, the

District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at: <http://www.valleyair.org/ISR/ISRHome.htm>.

- 6) Particulate Matter 2.5 microns or less in size (PM_{2.5}) from under-fired charbroilers (UFCs) pose immediate health risk. Since the cooking of meat can release carcinogenic PM_{2.5} species like polycyclic aromatic hydrocarbons (PAH), controlling emissions from under-fired charbroilers will have a substantial positive impact on public health.

Charbroiling emissions occur in populated areas, near schools and residential neighborhoods, resulting in high exposure levels for sensitive Valley residents. The air quality impacts on neighborhoods near restaurants with UFCs can be significant on days when meteorological conditions are stable, when dispersion is limited and emissions are trapped near the surface within the surrounding neighborhoods. This potential for neighborhood-level concentration of emissions during evening or multi-day stagnation events raises environmental concerns.

In addition, the cooking emissions source category is one of the largest single contributors of directly emitted PM_{2.5} in the Valley. Photochemical modeling conducted for the 2012 PM_{2.5} Plan showed that reducing commercial charbroiling emissions is critical to achieving PM_{2.5} attainment in the Valley.

The District committed to amend Rule 4692 (Commercial Charbroiling) in 2016, with a 2017 compliance date, to add emission control requirements for UFCs, as committed to in the District's 2012 PM_{2.5} Plan. Installing charbroiler emissions control systems during construction of new facilities is likely to result in substantial economic benefit compared to costly retrofitting.

Therefore, the District strongly recommends that your agency require new restaurants that will operate UFCs to install emission control systems during the construction phase. To ease the financial burden for Valley businesses that wish to install control equipment before it is required, the District is offering incentive funding during the time leading up to the amendment to the rule. Restaurants with UFCs may be eligible to apply for funding to add emission control systems. Please contact the District at (559) 230-5858 for more information.

- 7) The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (209) 557-6446. Current District rules can be found online at the District's website at: www.valleyair.org/rules/1ruleslist.htm.

The District recommends that a copy of the District's comments be provided to the project proponent. If you have any questions or require further information, please call Sharla Yang at (559) 230-5934.

Sincerely,

Arnaud Marjollet
Director of Permit Services



For Brian Clements
Program Manager

AM: sy



CHIEF EXECUTIVE OFFICE

Stan Risen
Chief Executive Officer

Patricia Hill Thomas
Chief Operations Officer/
Assistant Executive Officer

Keith D. Boggs
Assistant Executive Officer

Jody Hayes
Assistant Executive Officer

1010 10th Street, Suite 6800, Modesto, CA 95354
Post Office Box 3404, Modesto, CA 95353-3404

Phone: 209.525.6333 Fax 209.544.6226

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

April 21, 2017

John B. Anderson, Project Planner
City of Riverbank
Development Services Department
6707 3rd Street, South Hall
Riverbank, CA 95367

**SUBJECT: ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS
WEST SPECIFIC PLAN PROJECT – NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING**

Mr. Anderson:

Thank you for the opportunity to review and comment on the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and provides the following comments:

Agricultural Resources

The proposed project will convert approximately 380 acres of land located west of the current Riverbank City Limits and currently designated as Agriculture in the Stanislaus County General Plan to non-agricultural uses. The Environmental Impact Report (EIR) should evaluate the conversion of prime agricultural land to non-agricultural uses. The EIR analysis should also evaluate whether the conversion of the agricultural lands will have a significant adverse effect on surrounding farming operations located outside, but adjacent to the project site. The analysis should evaluate direct, indirect and cumulative effects of the conversion of prime agricultural resources to non-agricultural uses.

As a potential mitigation measure, Policy 2.15 of the County's Agricultural Element requires replacement of agricultural land at a 1:1 ratio with agricultural land of equal or greater quality located in Stanislaus County when agriculturally designated land is amended to a residential land use designation.

**ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC
PLAN PROJECT – NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT
REPORT AND SCOPING MEETING**

April 21, 2017

Page 2

The environmental assessment of the proposed project should also articulate the effectiveness of any proposed conservation easements and/or any in-lieu fees to preserving agricultural land uses. In accordance with the County agricultural conservation polices, the City is encouraged, to the greatest extent possible, to direct development away from the County's most productive agricultural area.

Traffic/Circulation

Public Works looks forward to working with the City of Riverbank in developing the Traffic Impact Analysis area of study for the Crossroads West Specific Plan.

The ERC appreciates the opportunity to comment on this project.

Sincerely,



Patrick Cavanah
Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

Elise Carroll

From: Steve McMurtry <smcmurtry@denovoplanning.com>
Sent: Thursday, April 20, 2017 10:20 PM
To: 'Elise Carroll'
Subject: FW: Crossroads West Follow Up
Attachments: 20170420090141399.pdf

Importance: High

Steve McMurtry, Principal
De Novo Planning Group
916-580-9818
www.denovoplanning.com

1020 Suncast Lane, Suite 106
El Dorado Hills, CA 95762

From: John Anderson [mailto:john@jbandersonplanning.com]
Sent: Thursday, April 20, 2017 9:19 AM
To: 'Carissa Higginbotham' <chigginbotham@scfpd.us>; 'Donna M. Kenney' <dkenney@riverbank.org>; Chief Mike Wapnowski <mwapnowski@scfpd.us>
Cc: Sean Scully <sscully@riverbank.org>; Steve McMurtry <smcmurtry@denovoplanning.com>
Subject: RE: Crossroads West Follow Up
Importance: High

Carissa and Mike:

Based on my conversation with your Board President yesterday there are two points of clarification I need to make.

Fire Station Size and Purpose

The discussion dating back to March 10, 2015 with Chief Bradley, Ken Slaymon Sr. and Wapnowski was that the new fire station would occupy $\frac{1}{2}$ to $\frac{3}{4}$ of an acre and be similar to the Modesto Fire Station at the south western corner of Prescott and Palendale Ave's. Certainly the station site can be of whatever size is necessary to accomplish the service demands of your department based on your adopted Fire Master Plan. The City does not chose the size nor the official location of your facilities and will rely of course on your expert recommendations.

Riverbank General Plan Compliance

Attached for your reference are polices adopted by the Riverbank City Council and incorporated into the Riverbank General Plan which state Fire Protection Services must be adequate to serve the needs of existing as well (future) planned development. The developer of the CRWSP must address their projects compliance with these adopted General Plan Policies. I would expect that your NOP comments could restate these adopted policies with the expectation that the CRWSP would be required to comply with the Riverbank General Plan.

I hope this helps you folks with your comments on the published NOP for the CRWSP.

Thanks in advance.

JBA

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

Ripon, CA 95366

PH: (209) 599-8377

Fax: (209) 599-8399

From: John Anderson [<mailto:John@jbandersonplanning.com>]

Sent: Tuesday, April 18, 2017 4:09 PM

To: 'Carissa Higginbotham'; 'Donna M. Kenney'; Chief Mike Wapnowski (mwapnowski@scfpd.us)

Cc: Sean Scully (sscully@riverbank.org); Steve McMurtry (smcmurtry@denovoplanning.com)

Subject: RE: Crossroads West Follow Up

Importance: High

Carissa:

Thanks for allowing me to conduct a conference call with Chief Wapnowski today. I understand that you are attempting to schedule a meeting with the Ad Hoc Committee commissioned to study the CRWSP for next Wednesday the 26th. Having the draft minutes from the past meetings would allow me to address key concerns of your District.

I will not be able to honor any extensions on the NOP filing deadline. I am sorry for this, but if I extend the filing deadline for the District I will be required to extend the deadline for all interested parties. Please keep in mind I have consistently shared the progress of this project with Chief Daly over the last year or so and even forward an advanced notice of the NOP filing on March 12th, about one week before the official NOP filing. We will obviously be working on the Draft EIR over the next several months and will continue to keep the Fire District in the loop on all project related details. This is to say that your input will be allowed during the entire EIR process and does not end with the NOP deadline of April 21, 2017.

As I have described, we are interested in knowing if the facts we published in the NOP filing are correct or if additional details need to be studied by our consultants. For example, we have heard that the District may need additional land upon which you intend to build a West Side Fire Station. If this is the case, we need to know the plans of the District so that we can accommodate your facility needs.

Attached is the current processing schedule for the CRWSP which suggest that we should have a Draft EIR published near the middle to end of August 2017.

Our understanding was after our meeting of January 9, 2017 that the District was to hire Citigate and CPFG to prepare both the Fire Master Plan and Capital fee evaluation. I was told today that this work has not been authorized by your Board. It will be critical for the District to have an adopted Master Plan and fee evaluation to justify appropriate mitigation for the CRWSP area as well other area wide developments. These studies should be applied to the CEQA documentation presented for the CRWSP as well as other future developments. The Districts delay in getting these studies started is of great concern to Riverbank.

Looking forward to future discussions regarding this project.

JBA

John B. Anderson

J.B. ANDERSON LAND USE PLANNING

139 S. Stockton Avenue

Ripon, CA 95366

PH: (209) 599-8377

Fax: (209) 599-8399

From: Carissa Higginbotham [<mailto:chigginbotham@scfpd.us>]

Sent: Tuesday, April 18, 2017 11:14 AM

To: John Anderson; 'Donna M. Kenney'
Subject: RE: Crossroads West Follow Up

Yes, please pencil it in tentatively for the 26th and I'll confirm. The committee hasn't approved any final meeting minutes yet, but I have the meeting recordings or can send you draft minutes tomorrow.

Would you be willing to grant our organization an extension to the April 21st deadline to submit comments?

Thank you for your consideration.

Carissa Higginbotham

Administrative Assistant III/Board Clerk
Deputy Public Information Officer
Stanislaus Consolidated Fire Protection District
[3324 Topeka Street](#)
[Riverbank, CA 95367](#)
Office: (209) 869-7470 | Cell: (209) 225-0676 | Fax: (209) 869-7475
Email: chigginbotham@scfpd.us

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Subscribe to Stanislaus Consolidated Fire Protection District on [YouTube](#) and [Nixle](#)

From: John Anderson [<mailto:john@jbandersonplanning.com>]
Sent: Tuesday, April 18, 2017 10:01 AM
To: Carissa Higginbotham <chigginbotham@scfpd.us>; 'Donna M. Kenney' <dkenney@riverbank.org>
Subject: RE: Crossroads West Follow Up

Carissa:

Thanks for the note. Shall I pencil in a possible meeting for the 26th at 3:00 PM????

Also did you get my prior message, "are there minutes of these meetings?"

Thanks in advance.

JBA

John B. Anderson
J.B. ANDERSON LAND USE PLANNING
139 S. Stockton Avenue
Ripon, CA 95366
PH: (209) 599-8377
Fax: (209) 599-8399

From: Carissa Higginbotham [<mailto:chigginbotham@scfpd.us>]
Sent: Tuesday, April 18, 2017 8:35 AM
To: Donna M. Kenney
Cc: John Anderson
Subject: RE: Crossroads West Follow Up

Good morning,

We do not have a meeting scheduled yet. We must post the agenda for a Committee Meeting for 72 hours prior to it to ensure Brown Act compliance and I did not learn of your availability until it was too late for a meeting to be scheduled this week with the Committee. I advised President Zanker of Mr. Anderson's availability on the 26th and am awaiting confirmation from her as to whether she wants to schedule something on that day or do something at the staff level sooner.

I will be in touch!

Carissa

From: Donna M. Kenney [<mailto:dkenney@riverbank.org>]
Sent: Tuesday, April 18, 2017 7:45 AM
To: Carissa Higginbotham <chigginbotham@scfpd.us>
Cc: John Anderson <john@jbandersonplanning.com>
Subject: RE: Crossroads West Follow Up

Hi Carissa,

Just following up on yesterday's email. Do we have a meeting this afternoon or tomorrow afternoon? Thanks,
Donna

Donna M. Kenney, AICP MCRP
Planning and Building Manager
City of Riverbank, California
(209) 863-7124

City Office Hours:

Monday – Thursday: 7:30 a.m. – 5:30 p.m.

Alternating Fridays: 8:00 a.m. – 5:00 p.m.

www.riverbank.org

In April 2017, City offices will be closed on the 21st.

In May 2017, City offices will be closed on the 5th, 19th, and 29th.

From: Donna M. Kenney
Sent: Monday, April 17, 2017 11:29 AM
To: 'Carissa Higginbotham'
Cc: 'John Anderson'
Subject: RE: Crossroads West Follow Up

Hi Caressa,

I just got off the phone with John Anderson. Both he and I are available to meet today, tomorrow or Wednesday at 3 pm. Please let us know as soon as possible so we can get the meeting on our calendars. As I mentioned last Thursday, this project is a priority for us and we are flexible. Ms. Zanker has concerns about getting Fire comments in and we want to address those concerns. Thanks, Donna

Donna M. Kenney, AICP MCRP
Planning and Building Manager

City of Riverbank, California
(209) 863-7124

City Office Hours:

Monday – Thursday: 7:30 a.m. – 5:30 p.m.

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www.riverbank.org

In April 2017, City offices will be closed on the 21st.

In May 2017, City offices will be closed on the 5th, 19th, and 29th.

From: Carissa Higginbotham [<mailto:chigginbotham@scfpd.us>]

Sent: Friday, April 14, 2017 4:14 PM

To: Donna M. Kenney

Subject: Crossroads West Follow Up

Good afternoon, Ms. Kenney:

Thank you for joining us for the Crossroads West Committee meeting yesterday. As requested, I have added you to the email distribution list for all SCFPD Board and committee meeting notifications. Regarding the scheduling of the next meeting that we hoped to have early next week, it appears that Mr. Anderson's availability, unfortunately, doesn't coincide with our Committee Members' and we may have to try for the following week. Since this means they will be meeting AFTER the EIR Prep comment/response due date, please let me know when you have a chance to talk to him about the Committee's request for an extension so I can include his response in my message to them about the scheduling of the next meeting.

Have a wonderful holiday weekend,

Carissa Higginbotham

Administrative Assistant III/Board Clerk
Deputy Public Information Officer
Stanislaus Consolidated Fire Protection District

[3324 Topeka Street](#)
[Riverbank, CA 95367](#)

Office: (209) 869-7470 | Cell: (209) 225-0676 | Fax: (209) 869-7475

Email: chigginbotham@scfpd.us

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April 21, 2017

John B. Anderson
City of Riverbank
6707 3rd St., South Hall
Riverbank, CA 95367

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT
FOR THE CROSSROADS WEST SPECIFIC PLAN PROJECT**

Dear Mr. Anderson:

Thank you for the opportunity to review the Notice of Preparation and Initial Study for the Crossroads West Specific Plan. As Lead Agency, the City of Riverbank is responsible for considering the effects, both individual and collective, of all activities involved in the project (Public Resources Code §21000 et seq). LAFCO, as a Responsible Agency, will utilize the CEQA documents prepared by the City in reviewing any future annexation within the updated Specific Plan area. The following comments are provided for the City's consideration:

- **Change of Organization (Annexation):** An annexation to a city requires LAFCO to consider several factors as outlined in Government Code Section 56668. The factors cover a wide variety of items and include: orderly growth, impacts to surrounding areas and agricultural lands, social and economic interests, and consistency with local plans and policies.
- **Agricultural Resources:** One of LAFCO's main charges, as set forth by the Legislature, is to protect and promote agriculture. The Commission has adopted an Agricultural Preservation Policy that requires applicants to prepare a "Plan for Agricultural Preservation" for annexation proposals that will impact agricultural lands. The Plan must include information such as the proposal's direct and indirect impacts to agricultural resources, the availability of other lands in the City's existing boundaries, and relevant General Plan policies. The Plan must also specify the method or strategy proposed to minimize the loss of agricultural lands. The information provided in the Plan should be consistent with the environmental documentation prepared by the City.
- **Plan for Providing Services:** Pursuant to LAFCO policies and Government Code §56653, the proposal must show that the City has the necessary services available to serve the proposed annexation area. This analysis must include detailed evidence of current and future service levels, sufficient sewer capacity, sufficient quantities and quality of water, police and fire services, and financing mechanisms for these services. Evidence must also be provided indicating that the annexing agency can at least maintain the current level of public services already provided within its boundaries.

- **Impacts to Special Districts:** The proposed Specific Plan Area is currently within the boundaries of the Stanislaus Consolidated Fire Protection District and Modesto Irrigation District. As part of the proposal's review, LAFCO will also consider impacts to these agencies as a result of the annexation. Pursuant to LAFCO policy, the Commission will deny proposals that would result in significant immitigable adverse effects upon other service recipients or other agencies servicing the affected area unless the approval is conditioned to avoid such impacts. The environmental analysis should identify if any future annexation will include new tax sharing agreements or assessments and include a discussion of any impacts as a result.

If you have any questions regarding these comments, please contact our office at (209) 525-7660.

Sincerely,



Sara Lytle-Pinhey
Executive Officer



SYLVAN UNION SCHOOL DISTRICT

605 SYLVAN AVENUE ✦ MODESTO, CA 95350 ✦ (209) 574-5000 ✦ FAX: (209) 524-2672

www.sylvan.k12.ca.us

April 11, 2017

DEBRA M. HENDRICKS
Superintendent
dhendricks@sylvan.k12.ca.us

City of Riverbank
Attn: John B. Anderson, Planner
6707 3rd Street South Hall
Riverbank, CA 95367

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Board President

CYNTHIA LINDSEY
Vice President

DAVID COLLINS
Member

GEORGE RAWE
Member

JENNIFER MIYAKAWA
Member

Re: Notice of Preparation of an Environmental Impact Report for the
Crossroads West Specific Plan

Dear Mr. Anderson:

Sylvan Union School District staff has reviewed the information provided for the above referenced project. The following concerns are submitted:

1. Placement of the school. The placement of an elementary and a middle school should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
2. The district provided a map of 3 different preferred areas within the specific plan for schools per your request on April 21, 2016, but the school designation in this document does not reflect the requested change.
3. 30 acres of land are needed to build one elementary school (10 acres) and one middle school (20 acres). (See attached map)
4. Schools must not be planned in areas that require environmental remediation.
5. The project may yield housing units beyond the district's busing policy of 1 mile for elementary students and 2 miles for middle school students. Therefore, please insure that provisions are provided to establish suitable (safe) school bus stops for the area.
6. Based on the Land Use Designation and units per acre provided on page 3 and 4 of the report, and based on student yield factor from our Developer Fee Justification Study, the projected number of students projected is:
 - Elementary 668 students (TK-5th Grade)
 - Middle School 369 additional Riverbank Students (Grades 6, 7, 8)
 - Currently there are 483 middle school students residing in Riverbank, projecting a total middle school enrollment of 852 students.

Thank you for the opportunity to provide input. If you have any questions or comments, please contact Yvonne Perez, Assistant Superintendent of Business Services at (209) 574-5000 ext 233.

Sincerely,


Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees

Our Mission:

To provide a dynamic, broad-based education that prepares each child to be a contributing member of society.



LAND USE DATA

- LOW-DENSITY RESIDENTIAL (LDR) - 0-8 DU/Acre¹
- MEDIUM DENSITY RESIDENTIAL (MDR) - 8-16 DU/Acre
- HIGH DENSITY RESIDENTIAL (HDR) - 16+ DU/Acre
- REGIONAL SPORTS PARK (P)
- MIXED USE¹ (MU)
- MIXED USE² (MU)
- COMMUNITY COMMERCIAL (CC)
- K-5 School (S)
- PUBLIC/QUASI-PUBLIC (PQ)
- PARK/BASIN (P)
- ARTERIALS, COLLECTORS AND LOCAL STREETS

Acres	D.U.'s	Average D.U./Acre	S.F.
226	1,356	6	-
20	240	12	-
12	300	25	-
22	-	-	-
3.5	60	23	-
5	50	10	25,000
58.4	174	-	500,000
12	-	-	-
1.4	-	-	-
17.5	-	-	-
24.6	-	-	-
390.4¹	2,200		525,000

LEGEND/NOTES

- ACCESS POINTS FOR COMMERCIAL
- EXISTING TRAFFIC SIGNALS
- K-5 SCHOOL¹ (S)
- ACTIVE ADULT²
- FUTURE MIDDLE SCHOOL EXPANSION
- BIKE TRAIL
- STORM DISCHARGE

NOTES:
¹ Total acreage does not include the existing Right-of-Ways for the MID Main Canal, Oakdale Road, MID Lateral 6, or Claribel Road.
² Active Adult is allowed anywhere within the LDR zoning designation.
³ The School location is a placeholder within the LDR zone.



Figure 4 – Proposed Crossroads West Land Use Map



Central Valley Regional Water Quality Control Board

13 April 2017

John B. Anderson
City of Riverbank
6707 3rd Street, South Hall
Riverbank, CA 95367

CERTIFIED MAIL
91 7199 9991 7036 6989 0516

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, CROSSROADS WEST SPECIFIC PLAN PROJECT, SCH# 2017032062, STANISLAUS COUNTY

Pursuant to the State Clearinghouse's 22 March 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environment Impact Report for the Crossroads West Specific Plan Project*, located in Stanislaus County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases,

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:

http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan

(SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/.

For more information on the Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml.

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

Waste Discharge Requirements

Discharges to Waters of the State

If USACOE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at: http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering

discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.



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Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento