



FINAL  
ENVIRONMENTAL IMPACT REPORT

FOR THE

CROSSROADS WEST SPECIFIC PLAN  
(SCH: 2017032062)

JANUARY 2019

*Prepared for:*

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

*Prepared by:*

De Novo Planning Group  
1020 Suncastr Lane, Suite 106  
El Dorado Hills, CA 95762  
(916) 580-9818

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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FINAL EIR

<b>Chapter</b>	<b>Page Number</b>
Executive Summary.....	ES-1
1.0 Introduction .....	1.0-1
1.1 Purpose and Intended Uses of the EIR .....	1.0-1
1.2 Environmental Review Process <a href="http://www.esg.montana.edu/gl/xy-data2.html">http://www.esg.montana.edu/gl/xy-data2.html</a> .	1.0-2
1.3 Organization of the Final EIR .....	1.0-3
2.0 Comments on Draft EIR and Responses .....	2.0-1
2.1 Introduction .....	2.0-1
2.2 List of Commenters.....	2.0-1
2.3 Comments and Responses.....	2.0-2
3.0 Errata .....	3.0-1
3.1 Revisions to the Draft EIR .....	3.0-1
4.0 Final Mitigation Monitoring and Reporting Program .....	4.0-1
4.1 Mitigation Monitoring and Reporting Program.....	4.0-1
 <b>Tables</b>	 <b>Page Number</b>
Table 2.0-1: List of Commenters on Draft EIR .....	2.0-1

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## INTRODUCTION

The City of Riverbank (City) determined that a Program-level environmental impact report (EIR) was required for the proposed Crossroads West Specific Plan (CWSP) pursuant to the requirements of the California Environmental Quality Act (CEQA).

The program-level analysis considers the broad environmental effects of the CWSP. CEQA Guidelines Section 15168 states that a program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

- 1) Geographically,
- 2) As logical parts in the chain of contemplated actions,
- 3) In connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program, or
- 4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The program-level analysis considers the broad environmental effects of the proposed CWSP. The EIR examines all phases of the project including planning, construction and operation. The program-level approach is appropriate for the CWSP because it allows comprehensive consideration of the reasonably anticipated scope of development plan; however, not all aspects of the future development are known at this stage in the planning process. Development projects in the Plan Area that require further discretionary approvals will be examined in light of this EIR to determine whether additional environmental documentation must be prepared.

## PROJECT DESCRIPTION

The following provides a brief summary and overview of the proposed Project. Section 2.0 of the Draft EIR includes a detailed description of the proposed Project, including maps and graphics. The reader is referred to Section 2.0 of the Draft EIR for a more complete and thorough description of the components of the proposed Project.

The CWSP area (also-known-as “Project site” or “Plan Area”) is located within the unincorporated area of Stanislaus County. The approximately 380-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 nine parcels that comprise the Plan Area are primarily used for agricultural operations including a cow dairy operation with 550 milking cows, 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.

Modesto Irrigation District (MID) provides water supply for the existing agricultural uses and maintains two easements on the Plan Area: a MID main canal with a crossing is located along the northern boundary of the Plan Area, and 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 ditches throughout the Plan Area.

The Plan Area is bounded on the east by Oakdale Road, on the south by Claribel Road, on the north by the 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 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. The plan accommodates the possibility for a future 10 to 12-acre elementary school as well as a 20 acre middle school within the Plan Area. The proposed Project would provide approximately 42 acres of park, open space, and Regional Sports Park uses.

The Project also includes a request for approval of General Plan Amendments, Specific Plan, pre-zoning, annexation of the entire Project site. The developers of the MU-1 "Mixed Use" area have concurrently filed an application for a Development Agreement, Tentative Map and Preliminary Development Plan to be considered as part of the approval action. Changes to the Land Use Element would include changing the approximately 380-acre Plan Area from LDR, MDR, HDR, MU, Civic (C), Community Commercial (CC), and Park (P) to Specific Plan (SP). The proposed Project would also require pre-zoning of the Project site. The City's pre-zoning for the Plan Area will include the Specific Plan (SP) zoning designation.

The quantifiable objectives of the proposed Project include annexation of approximately 380 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.

Refer to Section 2.0, Project Description, in the Draft EIR for a more complete description of the details of the proposed Project.

## ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the Project or to the location of the Project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed Project. The alternatives analyzed in this EIR include the following five alternatives in addition to the proposed Project:

- No Build (No Build) Alternative
- Off-Site Location Alternative
- Increased Density Alternative
- Lower Density Alternative

These alternatives are described in detail in Section 5.0, Alternatives to the Proposed Project, in the Draft EIR.

The No Project (No Build) Alternative is the environmentally superior alternative. However, as required by CEQA, when the No Project (No Build) Alternative is the environmentally superior alternative, the environmentally superior alternative among the others must be identified. The Off-Site Location Alternative would not reduce impacts related to any environmental issue. The Increased Density Alternative would reduce impacts in eight areas, and the Lower Density Alternative would reduce impacts in one area. Therefore, the Increased Density Alternative would be the next environmentally superior alternative. It should be noted that the Increased Density Alternative does not fully meet all of the Project objectives.

## COMMENTS RECEIVED

The Draft EIR addressed environmental impacts associated with the proposed project that are known to the City, were raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. The Draft EIR discussed potentially significant impacts associated with aesthetics, agricultural resources, air quality, biological resources, cultural and tribal resources, geology and soils, greenhouse gases and climate change, hazards, hydrology and water quality, land use, population, and housing, noise, public services and recreation, transportation and circulation, and utilities.

During the NOP process, several comments were received related to the analysis that should be included in the Draft EIR. These comments are included as Appendix A of the Draft EIR, and were considered during preparation of the Draft EIR.

The City of Riverbank received 12 comment letters regarding the Draft EIR from public agencies and members of the public. These comment letters on the Draft EIR are identified in Table 2.0-1 of this Final EIR. The comments received during the Draft EIR review processes are addressed within this Final EIR.

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This Final Environmental Impact Report (Final EIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Riverbank (City) is the lead agency for the environmental review of the Crossroads West Specific Plan (Project) and has the principal responsibility for approving the project. This Final EIR assesses the expected environmental impacts resulting from approval of the project and associated impacts from subsequent development and operation of the project, as well as responds to comments received on the Draft Environmental Impact Report (Draft EIR).

## 1.1 PURPOSE AND INTENDED USES OF THE EIR

### CEQA REQUIREMENTS FOR A FINAL EIR

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This Final EIR for the proposed Project has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that a Final EIR consist of the following:

- the Draft EIR or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed Project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed development, and an obligation to balance a variety of public objectives, including economic, environmental, and social factors.

### PURPOSE AND USE

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The City of Riverbank, as the lead agency, has prepared this Final EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval, construction, and operation of the proposed Crossroads West Specific Plan. Responsible and trustee agencies that may use the EIR are identified in Chapters 1.0 and 2.0 of the Draft EIR.

The environmental review process enables interested parties to evaluate the proposed project in terms of its environmental consequences, to examine and recommend methods to eliminate or

## 1.0 INTRODUCTION

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reduce potential adverse impacts, and to consider a reasonable range of alternatives to the Project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all aspects of construction and operation of the proposed project. The details and operational characteristics of the proposed project are identified in Chapter 2.0, Project Description, of the Draft EIR (April 2018).

### 1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

#### NOTICE OF PREPARATION

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The City of Riverbank circulated an Initial Study (IS) and Notice of Preparation (NOP) of an EIR for the proposed Project on March 22, 2017 to State Clearinghouse, State Responsible Agencies, State Trustee Agencies, Other Public Agencies, and Organizations and Interested Persons. A public scoping meeting was held on April 12, 2017 to present the project description to the public and interested agencies, and to receive comments from the public and interested agencies regarding the scope of the environmental analysis to be included in the Draft EIR. Concerns raised in response to the NOP were considered during preparation of the Draft EIR. The IS and NOP comments are presented in Appendix A of the Draft EIR.

#### NOTICE OF AVAILABILITY AND DRAFT EIR

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The City of Riverbank published a public Notice of Availability (NOA) for the Draft EIR on June 18, 2018 inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH # 2017032062) and the County Clerk, and was published in a local newspaper pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review and comment from June 18, 2018 through August 2, 2018.

The Draft EIR contains a description of the Project, description of the environmental setting, identification of Project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less-than-significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

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## RESPONSE TO COMMENTS/FINAL EIR

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The City of Riverbank received 12 comment letters regarding the Draft EIR from public agencies and private citizens. These comment letters on the Draft EIR are identified in Table 2.0-1, and are found in Chapter 2.0 of this Final EIR.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR, as required by CEQA. This Final EIR also contains minor edits to the Draft EIR, which are included in Chapter 3.0, Errata. This document, as well as the Draft EIR as amended herein, constitutes the Final EIR.

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## CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

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The City of Riverbank will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the Riverbank City Council may certify the Final EIR in accordance with CEQA and City of Riverbank environmental review procedures and codes. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed project which intelligently take account of environmental consequences.

Upon review and consideration of the Final EIR, the Riverbank City Council may take action to approve, revise, or reject the Project. A decision to approve the Crossroads West Specific Plan, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093. A Mitigation Monitoring and Reporting Program, as described below, would also be adopted in accordance with Public Resources Code Section 21081.6(a) and CEQA Guidelines Section 15097 for mitigation measures that have been incorporated into or imposed upon the Project to reduce or avoid significant effects on the environment. This Mitigation Monitoring and Reporting Program has been designed to ensure that these measures are carried out during Project implementation, in a manner that is consistent with the EIR.

### 1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

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#### CHAPTER 1.0 – INTRODUCTION

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Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead, agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

**CHAPTER 2.0 – COMMENTS ON THE DRAFT EIR AND RESPONSES**

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Chapter 2.0 provides a list of commenters, copies of written and electronic comments made on the Draft EIR (coded for reference), and responses to those written comments.

**CHAPTER 3.0 – ERRATA**

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Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments received on the Draft EIR, as well as minor staff edits.

**CHAPTER 4.0 – FINAL MMRP**

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Chapter 4.0 consists of a Mitigation Monitoring and Reporting Program (MMRP). The MMRP is presented in a tabular format that presents the impacts, mitigation measure, and responsibility, timing, and verification of monitoring.

## 2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft Environmental Impact Report (EIR) for the Crossroads West Specific Plan (CWSP), were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or add “significant new information” that would require recirculation of the Draft EIR pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

## 2.2 LIST OF COMMENTERS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City of Riverbank during the 45-day public review period for the Draft EIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed.

**TABLE 2.0-1: LIST OF COMMENTERS ON DRAFT EIR**

<i>RESPONSE LETTER</i>	<i>INDIVIDUAL OR SIGNATORY</i>	<i>AFFILIATION</i>	<i>DATE</i>
A	Christopher Diaz	Best Best & Krieger, LLP	7-30-18
B	Tom Dumas	California Department of Transportation	7-27-18
C	Patrick Kelly	City of Modesto	8-2-18
D	Duane Wolterstorff	Modesto City Schools	8-2-18
E	Lien Campbell	Modesto Irrigation District	7-19-18
F	Annabel D. Gammon	Resident of Stanislaus County	8-2-18
G	Evelyn Halbert	Resident of Riverbank	8-2-18
H	Javier Camarena	Stanislaus Local Agency Formation Commission	8-2-18
I	Amber Minami	Stanislaus County Department of Environmental Resources, Hazardous Materials Division	7-23-18
J	Patrick Cavanah	Stanislaus County Environmental Review Committee	8-7-18 9-6-18
K	Scott Morgan	State of California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit	8-2-18
L	Debra Hendricks	Sylvan Union School District	7-30-18

### 2.3 COMMENTS AND RESPONSES

#### REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

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CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the Project and ways to avoid or mitigate the significant effects of the Project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the CWSP Draft EIR.

#### RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

- Each letter is lettered (i.e., Letter A, Letter B) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

Indian Wells  
(760) 568-2811  
Irvine  
(949) 263-2800  
Los Angeles  
(213) 617-8100  
Manhattan Beach  
(310) 643-8448



2001 N. Main Street, Suite 390, Walnut Creek, CA 94596  
Phone: (925) 977-3300 | Fax: (925) 977-1870 | www.bbklaw.com

Ontario  
(909) 889-8584  
Riverside  
(951) 688-1450  
Sacramento  
(916) 325-4000  
San Diego  
(619) 525-1300  
Washington, DC  
(202) 785-0800

Christopher J. Diaz  
(925) 977-3309  
christopher.diaz@bbklaw.com

July 30, 2018

**VIA E-MAIL AND OVERNIGHT DELIVERY**

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

Re: Comments On Crossroads West Specific Plan Draft EIR

Dear Mr. Anderson:

The Stanislaus Consolidated Fire Protection District (Fire District) is in receipt of the Draft Environmental Impact Report (Draft EIR) for the Crossroads West Specific Plan (Project) in the City of Riverbank (City). The Fire District values the opportunity to comment on the Draft EIR 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 to provide and oversee a detailed and thorough review of all Project-related documents, a commitment which required a significant expenditure of staff and counsel time. As part of that review, our legal counsel, Christopher Diaz, submitted a detailed April 21, 2017 comment letter to the City in response to its Notice of Preparation of the EIR, a letter which identified those topics for which the Fire District believes that analysis is required to ensure that the EIR adequately ascertains, discloses, and feasibly mitigates the potential environmental impacts of the Project (NOP Comment Letter).

A-1

Unfortunately, review of the Draft EIR shows that the City did not address the majority of the issues raised in the NOP Comment Letter, resulting in a Draft EIR that does not yet adequately ascertain, disclose, and feasibly mitigate all potential environmental impacts of the Project. Accordingly, and consistent with its commitment to ensure that the Fire District continues to meet the service delivery needs of the Riverbank community, and in compliance with State CEQA Guidelines section 15086(1) and 15087, the Fire District hereby submits the following comments on the Draft EIR:

- While Chapter 3.10, the Land Use, Population and Housing Chapter of the Draft EIR, includes a threshold to consider whether the Project would “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)

A-2



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

July 30, 2018  
Page 2

adopted for the purpose of avoiding or mitigating an environmental effect," the Draft EIR's analysis of this threshold fails to address any of the City's multiple General Plan policies that were the City adopted for the purpose of avoiding or mitigating the environmental effects of fire. (Draft EIR, pp. 3.10-8 – 3.10-13.) Specifically:

A-2  
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- o Despite the Fire District's request in its NOP Comment Letter, the Draft EIR does not reference or address City General Plan Policy PUBLIC-7.1, which requires that 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. This must be address in the Final EIR. Absent confirmation of adequate fire flow pressure, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- o Despite the Fire District's request in its NOP Comment Letter, the Draft EIR does not reference or address City General Plan Policy PUBLIC-7.2, which requires that the EIR 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. This must be address in the Final EIR. Absent confirmation that the Project can ensure the required minimum fire flow pressure, the EIR must require all feasible mitigation necessary to reduce such an impact to a less than significant level.
- o Despite the Fire District's request in its NOP Comment Letter, Chapter 3.10 of the Draft EIR does not reference or address City General Plan Policy PUBLIC-7.3, which requires that that 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 Draft EIR does state that "a fire station site" would "be located near the corner of Crawford and Oakdale Road" and, while the site is marked on Figure 2.0-8, the *Conceptual Land Use Plan*, the size of the site is never disclosed. (Draft EIR, p. 2.0-6.) 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.

A-3

A-4



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

July 30, 2018  
Page 3

- \* Chapter 3.12, Public Services and Recreation does reference City General Plan Policy PUBLIC-7.3, but states that "it is unclear at this time when the station [at the corner of Crawford and Oakdale Road] will be constructed. (Draft EIR, p. 3.12-17.) However, absent the Project's provision of an adequately-sized site for a new fire station, and a commitment to timely construct it, the EIR must require all feasible mitigation necessary to reduce such an impact with regard to the Project's inconsistency with General Plan Policy PUBLIC 7-3 to a less than significant level. It is not sufficient to simply to observe that the lack of certainty as to the timing of the construction of the future fire station would result in a significant and unavoidable impact with regard to the impacts of development of the fire station; the City cannot approve a project that is expressly inconsistent with a General Plan Policy, and the EIR must disclose the impacts related to this conflict and impose all feasible mitigation to avoid or mitigate the environmental effects of fires.
- Despite the Fire District's request in its NOP Comment Letter, Chapter 3.10 of the Draft EIR does not reference or address City General Plan Policy PUBLIC-7.5, which requires that 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. Per 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 Policy PUBLIC-7.5. Also, per 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.
- \* Chapter 3.12, Public Services and Recreation does reference City General Plan Policy PUBLIC-7.5, but references only an Insurance Services Office (ISO) Public Projection Classification Program survey 2014. Not only is this survey outdated, it does not include any analysis of response times in the Project area, meaning that is irrelevant to analysis of the Project's compliance with Policy PUBLIC-7.5. At the very least the EIR must employ the data provided in the *Standards of Response Time Coverage Study for the Stanislaus Regional Fire Agency Partners*, which includes an analysis of response times in the City. (A hard copy of this analysis is included as an enclosure with this comment letter.) While this survey too is from 2014, and an updating of its analysis is the next step required by the City to ensure full

A-4  
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A-5



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

July 30, 2018  
Page 4

disclosure in the EIR, this Study can assist with the City meeting its obligations under Policy PUBLIC -7.5 to verify that the proposed location of the new fire station will meet response times within the established limits. Critically, it is not sufficient to simply to observe that the lack of certainty as to the timing of the construction of the future fire station would result in a significant and unavoidable impact with regard to the impacts of development of the fire station; the City cannot approve a project that is expressly inconsistent with a General Plan Policy, and the EIR must disclose the impacts related to this conflict and impose all feasible mitigation to avoid or mitigate the environmental effects of fires.

A-5  
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- Despite the Fire District's request in its NOP Comment Letter, Chapter 3.10 of the Draft EIR does not reference or address City General Plan Policy PUBLIC 7.4, which requires that the EIR include substantial evidence reflecting coordination with fire protection providers, including through reciprocity 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.

A-6

- Chapter 3.12, Public Services and Recreation does reference City General Plan Policy PUBLIC-7.4, but, does not contain any evaluation whether the City will comply with this Policy in order to avoid inconsistency with its General Plan and to avoid or mitigation the environmental impacts of fire related to failure to comply with this Policy. (Draft EIR, pp. 3.12-7-3.12-8.)

- Despite the Fire District's request in its NOP Comment Letter, the EIR does not 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 Project area. Instead, all the Draft EIR contains is a non-binding statement that "the City of Riverbank and the SCFPD will work cooperatively to ensure new development pays its fair share for facilities associated with new growth" and the observation that the imposition of Fire Mitigation Fees provide the financial tools necessary to guarantee capacity will be available for the future." (Draft EIR, p. 3.12-18.) Instead, at the very least, to ensure all the adoption of all feasible mitigation, the EIR must include a mitigation measure comparable to MM 3.12-1 for Police Services, a measure already included in the Draft EIR, to require that, prior to the City recording a "Final Map" for each Project within the Plan Area, the owner of the project/map shall either annex the mapped property into a Community Facilities District ("CFD"), or create a new CFD for the mapped property, which will include funding for operational services with the Stanislaus Consolidated Fire Protection District.

A-7



**BEST BEST & KRIEGER**  
ATTORNEYS AT LAW

July 30, 2018  
Page 5

It is essential that these comments are adequately addressed in order 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. The Fire District's existing ratepayers must not be asked to make a choice between seeing their fire service lessened to accommodate the Project or to foot the bill for the fire service demands of the Project.

As a Responsible Agency for this Project, if the Fire District concludes that the Final EIR is inadequate for its purposes, under CEQA Guidelines section 15050 and 15096, it must challenge the adequacy of the EIR in court. Accordingly, we appreciate your consideration of the Fire District's comments on the Draft EIR, and look forward to the City's preparation of a Final EIR, or of a recirculated Draft EIR, that ensures the environmental review of the Project is adequate for the Fire District's purposes, and adequately ascertains, discloses, and feasibly mitigates all potential environmental impacts of the Project.

A-8

Sincerely,

Christopher J. Diaz  
For BEST BEST & KRIEGER LLP

Encl.: Standards of Response Time Coverage Study for  
the Stanislaus Regional Fire Agency Partners

cc: Stanislaus Consolidated Fire Protection District Board of Directors

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# CITYGATE ASSOCIATES, LLC

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■ FOLSOM (SACRAMENTO), CA

MANAGEMENT CONSULTANTS ■

■ ■

**STANDARDS OF  
RESPONSE COVERAGE  
STUDY FOR THE**

**STANISLAUS REGIONAL  
FIRE AGENCY PARTNERS**

*STATISTICAL APPENDIX*

April 22, 2014

■ ■



■ 2250 East Bidwell St., Ste #100 ■ Folsom, CA 95630  
(916) 458-5100 ■ Fax: (916) 983-2090



**TABLE OF CONTENTS**

<u>Section</u>	<u>Page</u>
1. Dataset Identification .....	1
1.1 Significant Time Stamping Problems .....	1
1.2 Naming Conventions .....	1
1.3 Data Quality .....	2
1.4 Analysis Period .....	2
2. Demand for Service .....	2
2.1 Breakdown by Incident Type .....	3
2.2 Breakdown by Property Type .....	13
2.3 Monthly Incident Demand .....	22
2.4 Demand by Station Area .....	25
2.5 Dollar Loss Incidents .....	26
2.6 Simultaneous Analysis .....	30
2.7 Aid Activity with Other Jurisdictions .....	31
2.8 Station Demand Percentage .....	32
3. Performance Measurements .....	33
3.1 Call Handling Time – Department-Wide .....	33
3.2 Turnout Time .....	34
3.3 Turnout Time by Station Area .....	35
3.4 Travel Time .....	36
3.5 Travel Time by Station Area .....	37
3.6 Call to Arrival Performance .....	37
3.7 Effective Response Force .....	38

**Table of Tables**

Table 1—Incidents: Count by Year .....	3
Table 2—Incidents: Count by Fire Department by Incident Type .....	3
Table 3—Incidents: Total Staff Hours by Fire Department by Incident Type .....	8
Table 4—Incidents: Count by Fire Department by Property Use .....	13
Table 5—Incidents: Total Staff Hours by Fire Department by Property Use .....	18
Table 6—Incidents: Count by Year by Station.....	26
Table 7—Incidents: Total Loss by Year by Station.....	27
Table 8—Incidents: Total Loss by Year by Incident Type .....	28
Table 9—Simultaneous Incidents: Count by Year by Station.....	30
Table 10—Incidents: Count by Aid Type .....	31
Table 11—Station Demand Spreadsheet.....	32
Table 12—Call Handling.....	34
Table 13—Turnout Time.....	34
Table 14—Incidents: 90% Performance Minutes by Year by Station (Turnout Time).....	35
Table 15—Travel Time .....	36
Table 16—Incidents: 90% Performance Minutes by Year by Station (Travel Time) .....	37
Table 17—Dispatch to Arrival .....	38



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## STANISLAUS REGIONAL FIRE AGENCY PARTNERS INCIDENT RESPONSE STATISTICS ANALYSIS

As part of Citygate Associates, LLC's Standards of Coverage (SOC) Assessment for the Stanislaus Regional Fire Agency Partners, this incident response statistical appendix to the main report volume was prepared based on an incident data assessment performed by *StatsFD*. This analysis considered three years of data and is intended to identify broad trends and areas in need of additional study.

### 1. DATASET IDENTIFICATION

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*This section describes the sources and quality of data used in this study.*

Modesto Regional Fire Authority provided NFIRS 5 incident and matching CAD apparatus response data for Modesto, Ceres, and Stanislaus County. Because of data changes from a new CAD system in 2010 the data range was narrowed to the 3-calendar-year period 1/1/2011 – 12/31/2013. This data includes a total of 88,844 incidents and 114,005 apparatus responses for the three fire departments.

#### 1.1 Significant Time Stamping Problems

Accurate timestamps are an important part of fire department public records. Many apparatus records, especially those early in the 3-year study period, are time-stamped using the same time for the time of the alarm, the time the apparatus is notified, and, frequently, the time the apparatus starts traveling to the scene of the emergency.

If it is our understanding the accuracy of the timestamp is related to whether a specific apparatus has a mobile data terminal. When the terminals are installed, distinct times are present. When they are not installed, the same time is frequently used for time of alarm, dispatch, and apparatus response.

This practice is risky from a liability perspective. If public records are subpoenaed, the time of alarm, dispatch, and travel to the scene will be closely scrutinized by legal counsel. Inaccurate timestamps will be subject to additional inquiry. In addition, the accuracy of these timestamps is essential to an accurate analysis of fire department operations.

#### 1.2 Naming Conventions

The Federal Emergency Management Agency's (FEMA) NFIRS 5 specifications set a maximum number of characters allowed to identify unique fire stations and responding companies. Stations are limited to 3 characters. Companies are limited to 5 characters. If Station IDs or Vehicle IDs exceed these specifications software vendors frequently truncate the ID to pass it on to the state or to FEMA without generating errors.

Consider this example. If Stanislaus County adopts the Station ID's ST31, ST32, ST33, and ST34, the software will truncate the last character and report all station activity as the 3-character ID "ST3." The same is true for company IDs exceeding 5 characters.

When identifying Stations and Vehicles, best practice is to keep ID's within federal specifications. This will help eliminate errors and assure your data exports completely identify stations and companies.

### 1.3 Data Quality

The agencies, via their shared dispatch center, use the current NFIRS 5 reporting standard.

Dataset strengths include the following:

1. Use of seconds in time fields
2. Multiple years of data available
3. Standardized incident numbers in NFIRS 5 and CAD data.

Dataset weaknesses include the following:

1. No consistent and distinct time of call timestamp
2. Time of call and time of dispatch frequently the same time
3. Poor time stamping of apparatus not equipped with mobile data terminals
4. Multiple vehicle IDs exceeding federal specifications.

### 1.4 Analysis Period

Data was assembled into the following calendar years:

- ◆ 2011
- ◆ 2012
- ◆ 2013

## 2. DEMAND FOR SERVICE

*Service demands are broken-down into specific incident types and property types. Dollar losses, simultaneous activity, and inter-departmental aid are also outlined in this section.*

In 2013 the three fire departments making up this Stanislaus Regional Fire Agency Partners study responded to 31,515 incidents for an average of 86.34 incidents per day. Of those incident responses, 2.24% were to fire, 62.86% were to EMS, and 34.90% were to other types of incidents.

Here is a breakdown of the number of incidents by fire department by year.

*There are 88,814 Incident records being analyzed.*

**Table 1—Incidents: Count by Year**

Fire Department	2011	2012	2013	Totals
Ceres	4,024	4,454	4,573	13,051
Modesto	20,666	22,073	22,972	65,711
Stanislaus	2,316	3,766	3,970	10,052
<b>Totals</b>	<b>27,006</b>	<b>30,293</b>	<b>31,515</b>	<b>88,814</b>

With each year incident volume is increasing in each of the three fire departments.

**2.1 Breakdown by Incident Type**

Below is a list of the incident types occurring in each of the three fire departments from 1/1/2011 – 12/31/2013. EMS dominates when measuring incident types by number of incidents. Notice the high number of “611 Dispatched & canceled en route” incidents.

Building fires rank 10<sup>th</sup> by incident count.

*There are 88,814 Incident records being analyzed.*

**Table 2—Incidents: Count by Fire Department by Incident Type**

Incident Type	Ceres	Modesto	Stanislaus	Totals
311 Medical assist, assist EMS crew	2,044	21,533	2,793	26,370
321 EMS call, excluding vehicle accident with injury	5,847	17,648	2,783	26,278
611 Dispatched & canceled en route	1,001	6,980	1,221	9,202
661 EMS call, party transported by non-fire agency		2,877	9	2,886
322 Vehicle accident with injuries	291	1,393	240	1,924
622 No incident found on arrival of incident address	34	1,439	128	1,601
553 Public service	16	1,473	84	1,573
324 Motor vehicle accident no injuries	184	869	176	1,229
554 Assist invalid	176	886	158	1,220
111 Building fire	215	697	200	1,112
300 Rescue, emergency medical call (EMS) call, other	1,029	12	23	1,064
700 False alarm or false call, other	83	776	39	898
651 Smoke scare, odor of smoke	194	530	115	839
600 Good intent call, other	37	515	36	588

Incident Type	Ceres	Modesto	Stanislaus	Totals
151 Outside rubbish, trash or waste fire	61	392	111	564
745 Alarm system sounded, no fire - unintentional	38	469	49	556
143 Grass fire	105	252	169	526
551 Assist police or other governmental agency	114	325	53	492
131 Passenger vehicle fire	87	315	75	477
550 Public service assistance, other	67	326	33	426
412 Gas leak (natural gas or LPG)	72	277	49	398
735 Alarm system sounded due to malfunction	60	181	143	384
154 Dumpster or other outside trash receptacle fire	39	307	37	383
510 Person in distress, other	17	211	137	365
142 Brush, or brush and grass mixture fire	47	252	63	362
500 Service Call, other	83	255	24	362
561 Unauthorized burning	76	173	94	343
150 Outside rubbish fire, other	52	202	35	289
743 Smoke detector activation, no fire - unintentional	78	193	18	289
552 Police matter	13	245	20	278
118 Trash or rubbish fire, contained	24	206	26	256
113 Cooking fire, confined to container	42	192	17	251
140 Natural vegetation fire, other	61	164	24	249
733 Smoke detector activation due to malfunction	42	158	48	248
323 Motor vehicle/pedestrian accident (MV Ped)	58	148	35	239
100 Fire, other	31	152	25	208
463 Vehicle accident, general cleanup	4	173	15	192
440 Electrical wiring/equipment problem, other	33	120	24	177
511 Lock-out	39	101	25	165
381 Rescue or EMS standby		148	6	154
444 Power line down	22	87	31	140
531 Smoke or odor removal	7	112	8	127
445 Arcing, shorted electrical equipment	25	82	18	125
740 Unintentional transmission of alarm, other	41	64	8	113
160 Special outside fire, other	15	92	5	112
653 Barbecue, tar kettle	13	70	24	107
711 Municipal alarm system, malicious false alarm	12	32	62	106
730 System malfunction, other	17	78	12	105

Incident Type	Ceres	Modesto	Stanislaus	Totals
411 Gasoline or other flammable liquid spill	15	78	8	101
400 Hazardous condition, other	13	71	11	95
671 Hazmat release investigation w/ no hazmat	4	77	12	93
631 Authorized controlled burning	9	26	55	90
710 Malicious, mischievous false call, other	18	66	5	89
424 Carbon monoxide incident	18	63	6	87
744 Detector activation, no fire - unintentional	11	67	9	87
900 Special type of incident, other	13	39	30	82
736 CO detector activation due to malfunction	5	63	10	78
520 Water problem, other	13	50	7	70
650 Steam, other gas mistaken for smoke, other	11	49	6	66
652 Steam, vapor, fog or dust thought to be smoke	20	31	14	65
112 Fires in structures other than in a building	21	38	5	64
522 Water or steam leak	9	46	6	61
352 Extrication of victim(s) from vehicle	13	27	20	60
715 Local alarm system, malicious false alarm	11	30	19	60
130 Mobile property (vehicle) fire, other	12	40	6	58
413 Oil or other combustible liquid spill	9	40	7	56
911 Citizen complaint	2	16	32	50
353 Removal of victim(s) from stalled elevator	4	43		47
571 Cover assignment, standby, moveup	24	1	21	46
746 Carbon monoxide detector activation, no CO	7	32	4	43
480 Attempted burning, illegal action, other	4	31	5	40
114 Chimney or flue fire, confined to chimney or flue	8	23	8	39
441 Heat from short circuit (wiring), defective/worn	5	24	9	38
461 Building or structure weakened or collapsed	7	28	2	37
132 Road freight or transport vehicle fire	9	21	6	36
363 Swift water rescue		3	28	31
542 Animal rescue	6	20	4	30
350 Extrication, rescue, other	9	19	1	29
442 Overheated motor	2	23	4	29
741 Sprinkler activation, no fire - unintentional	5	16	7	28
141 Forest, woods or wildland fire	1	11	14	26
162 Outside equipment fire	3	16	6	25

Incident Type	Ceres	Modesto	Stanislaus	Totals
410 Flammable gas or liquid condition, other	5	18	2	25
161 Outside storage fire	2	14	7	23
734 Heat detector activation due to malfunction	4	15	1	20
122 Fire in motor home, camper, recreational vehicle	5	7	7	19
320 Emergency medical service, other (conversion only)	4	11	3	18
422 Chemical spill or leak	4	13	1	18
621 Wrong location	4	8	5	17
714 Central station, malicious false alarm	1	10	6	17
731 Sprinkler activation due to malfunction	2	9	6	17
360 Water & ice related rescue, other	2	11	3	16
481 Attempt to burn	2	11	3	16
173 Cultivated trees or nursery stock fire	3	10	2	15
342 Search for person in water	2	9	4	15
421 Chemical hazard (no spill or leak)		13	2	15
137 Camper or recreational vehicle (RV) fire	6	7	1	14
171 Cultivated grain or crop fire	2	2	10	14
331 Lock-in (if lock out, use 511)	3	9	2	14
361 Swimming/recreational water areas rescue		4	9	13
170 Cultivated vegetation, crop fire, other	3	4	5	12
121 Fire in mobile home used as fixed residence	4	2	4	10
138 Off-road vehicle or heavy equipment fire		3	7	10
462 Aircraft standby		8	2	10
251 Excessive heat, scorch burns with no ignition		5	4	9
443 Light ballast breakdown	3	5	1	9
540 Animal problem, other	6	2	1	9
240 Explosion (no fire), other	1	5	2	8
420 Toxic condition, other		6	2	8
512 Ring or jewelry removal	1	7		8
365 Watercraft rescue	1	1	5	7
460 Accident, potential accident, other		4	3	7
632 Prescribed fire	2	4	1	7
351 Extrication of victim(s) from building/structure		5	1	6
541 Animal problem		6		6
721 Bomb scare - no bomb	2	4		6

Incident Type	Ceres	Modesto	Stanislaus	Totals
123 Fire in portable building, fixed location		3	2	5
134 Water vehicle fire		4	1	5
354 Trench/below grade rescue		5		5
340 Search, other		1	3	4
521 Water evacuation	1	3		4
116 Fuel burner/boiler malfunction, fire confined		1	2	3
152 Garbage dump or sanitary landfill fire	1		2	3
221 Overpressure rupture of air or gas pipe/pipeline		3		3
243 Fireworks explosion (no fire)	1	1	1	3
356 High angle rescue		1	2	3
451 Biological Hazard, Confirmed or Suspected	2	1		3
732 Extinguishing system activation due to malfunction		3		3
742 Extinguishing system activation	1	2		3
120 Fire in mobile prop. used as a fixed struc., other	1	1		2
136 Self-propelled motor home or recreational vehicle	1	1		2
155 Outside stationary compactor/compacted trash fire			2	2
3 Rescue & Emergency Medical Service Incidents	1	1		2
357 Extrication of victim(s) from machinery		2		2
423 Refrigeration leak		1	1	2
471 Explosive, bomb removal (for bomb scare, use 721)	1	1		2
482 Threat to burn		2		2
712 Direct tie to FD, malicious/false alarm		2		2
713 Telephone, malicious false alarm		1	1	2
800 Severe weather or natural disaster, other		1	1	2
812 Flood assessment		2		2
115 Incinerator overload or malfunction, fire confined			1	1
117 Commercial Compactor fire, confined to rubbish			1	1
133 Rail vehicle fire	1			1
153 Construction or demolition landfill fire		1		1
163 Outside gas or vapor combustion explosion		1		1
172 Cultivated orchard or vineyard fire			1	1
200 Overpressure rupture, explosion, overheat other		1		1
212 Overpressure rupture of steam boiler			1	1
220 Overpressure rupture from air or gas, other		1		1

Incident Type	Ceres	Modesto	Stanislaus	Totals
223 Air or gas rupture of pressure or process vessel		1		1
355 Confined space rescue			1	1
364 Surf rescue			1	1
555 Defective elevator, no occupants			1	1
56 Unauthorized burning		1		1
641 Vicinity alarm (incident in other location)	1			1
672 Biological Hazard Investigation, None Found		1		1
751 Biological Hazard, Malicious False Report		1		1
813 Wind storm, tornado/hurricane assessment			1	1
815 Severe weather or natural disaster standby			1	1
<b>Totals</b>	<b>13,051</b>	<b>65,711</b>	<b>10,052</b>	<b>88,814</b>

Here is the same selection of incidents, but this time incidents are ordered by the number of staff hours by incident type. Here we see the number of staff hours spent in building fires is greater than the number of staff hours for any of the three EMS incident types.

*There are 88,814 Incident records being analyzed.*

**Table 3—Incidents: Total Staff Hours by Fire Department by Incident Type**

Incident Type	Ceres	Modesto	Stanislaus	Totals
111 Building fire	2,360.04	21,535.12	2,529.14	26,424.30
321 EMS call, excluding vehicle accident with injury	4,659.85	17,093.14	2,392.32	24,145.31
311 Medical assist, assist EMS crew	1,230.58	17,749.73	2,206.23	21,186.54
322 Vehicle accident with injuries	727.11	2,966.87	628.36	4,322.34
611 Dispatched & canceled en route	256.22	2,890.01	445.5	3,591.73
142 Brush, or brush and grass mixture fire	418.91	2,328.85	461.32	3,207.08
143 Grass fire	401.69	1,263.12	815.65	2,480.46
661 EMS call, partly transported by non-fire agency		2,151.24	7.02	2,158.26
651 Smoke scare, odor of smoke	335.69	1,662.77	123.61	2,122.07
324 Motor vehicle accident no injuries	389.79	1,244.94	368.07	2,002.80
553 Public service	16.65	1,604.43	70.34	1,691.42
131 Passenger vehicle fire	198.39	1,172.67	251.25	1,622.31
151 Outside rubbish, trash or waste fire	164.08	1,084.62	238.17	1,486.87
551 Assist police or other governmental agency	388.35	916.61	108.61	1,413.57
622 No incident found on arrival of incident address	52.11	1,153.81	115.68	1,321.60

Incident Type	Ceres	Modesto	Stanislaus	Totals
412 Gas leak (natural gas or LPG)	138.53	1,024.81	108.32	1,271.66
554 Assist invalid	134.73	922.19	118.86	1,175.78
140 Natural vegetation fire, other	181.14	840.2	104.33	1,125.67
113 Cooking fire, confined to container	141.16	925.15	44.5	1,110.81
100 Fire, other	88.99	853.91	49.79	992.69
700 False alarm or false call, other	76.77	842.91	34.8	954.48
112 Fires in structures other than in a building	163.67	555.89	80.18	799.74
154 Dumpster or other outside trash receptacle fire	55.8	557.13	68.83	681.76
440 Electrical wiring/equipment problem, other	83.35	498.06	44.35	625.76
150 Outside rubbish fire, other	84.75	452.01	87.8	624.36
600 Good intent call, other	37.92	525.96	32.34	596.22
300 Rescue, emergency medical call (EMS) call, other	508.15	10.04	85.93	584.12
745 Alarm system sounded, no fire - unintentional	39.19	481.75	48.8	589.74
118 Trash or rubbish fire, contained	25.99	484.57	41.2	551.76
550 Public service assistance, other	68.06	425.83	34.35	528.24
352 Extrication of victim(s) from vehicle	176.1	162.81	149.63	488.54
500 Service Call, other	97	348.67	16.26	461.93
552 Police matter	17.1	406.08	18.68	441.86
531 Smoke or odor removal	13.83	413.73	7	434.56
463 Vehicle accident, general cleanup	45.21	345.42	39.13	429.76
160 Special outside fire, other	51.27	283.09	31.56	365.92
510 Person in distress, other	17.03	223.06	118.3	358.39
735 Alarm system sounded due to malfunction	83.84	178.32	113.14	355.3
400 Hazardous condition, other	20.74	319.47	13.18	353.39
743 Smoke detector activation, no fire - unintentional	68.09	239.69	9.33	317.11
323 Motor vehicle/pedestrian accident (MV Ped)	84.5	177.87	54.39	316.76
445 Arcing, shorted electrical equipment	66.72	221.17	25.35	313.24
733 Smoke detector activation due to malfunction	41.26	227.25	38.39	306.9
141 Forest, woods or wildland fire	17.7	157.91	127.27	302.88
561 Unauthorized burning	65.53	159.46	66.97	291.96
444 Power line down	82.91	187.7	40.37	290.98
132 Road freight or transport vehicle fire	71.08	163.86	30.34	265.28
411 Gasoline or other flammable liquid spill	42.32	203.37	10.1	255.79
424 Carbon monoxide incident	42.91	203.07	8.05	254.03



Incident Type	Geres	Modesto	Stanislaus	Totals
571 Cover assignment, standby, moveup	83.03	2.04	163.21	248.28
161 Outside storage fire	15.14	149.18	83.22	247.54
130 Mobile property (vehicle) fire, other	27.19	195.97	19.5	242.66
114 Chimney or flue fire, confined to chimney or flue	35.28	161.92	39.01	236.21
900 Special type of incident, other	16.87	148.92	55.04	220.83
381 Rescue or EMS standby		211.64	3.84	215.48
420 Toxic condition, other		183.27	5.05	188.32
122 Fire in motor home, camper, recreational vehicle	48.75	72.83	65.13	186.71
363 Swift water rescue		48.33	135.32	181.65
441 Heat from short circuit (wiring), defective/worn	23.81	134	20.29	177.9
442 Overheated motor	41.39	114.13	7.73	163.25
520 Water problem, other	26.79	119.26	14.04	160.11
671 Hazmat release investigation w/ no hazmat	4.1	142.21	11.08	157.39
353 Removal of victim(s) from stalled elevator	4.78	148.37		153.15
360 Water & ice related rescue, other	9.65	119.22	21.44	150.31
137 Camper or recreational vehicle (RV) fire	59.53	83.51	6.3	149.34
481 Building or structure weakened or collapsed	23.3	119.06	1.7	144.06
522 Water or steam leak	8.74	114.7	9.37	132.81
653 Barbecue, tar kettle	14.19	95.03	20.15	129.37
121 Fire in mobile home used as fixed residence	48.12	12.82	58.57	119.51
730 System malfunction, other	18.11	85.62	11.5	115.23
511 Lock-out	21.92	78.34	14.93	115.19
736 CO detector activation due to malfunction	4.55	88.94	14.15	107.64
350 Extrication, rescue, other	40.66	65.71	0.73	107.1
744 Detector activation, no fire - unintentional	10.18	80.98	12.61	103.75
631 Authorized controlled burning	13.18	22.49	66.57	102.24
342 Search for person in water	7.73	80.09	13.61	101.43
711 Municipal alarm system, malicious false alarm	9.96	45.15	44.68	99.69
162 Outside equipment fire	1.8	71.1	26.43	99.33
171 Cultivated grain or crop fire	13.24	11.52	70.76	95.52
413 Oil or other combustible liquid spill	11.27	67.17	15.57	94.01
650 Steam, other gas mistaken for smoke, other	9.82	75.79	7.79	93.4
740 Unintentional transmission of alarm, other	25.98	45.7	10.05	81.73
710 Malicious, mischievous false call, other	17.12	60.92	3.64	81.68

Incident Type	Ceres	Morongo	Stanislaus	Totals
741 Sprinkler activation, no fire - unintentional	12.72	54	14.76	81.48
652 Steam, vapor, fog or dust thought to be smoke	24.91	37.77	10.44	73.12
480 Attempted burning, illegal action, other	4.23	60.63	4.39	69.25
170 Cultivated vegetation, crop fire, other	18.44	21.48	26.49	66.41
410 Flammable gas or liquid condition, other	6.04	57.38	2.33	65.75
746 Carbon monoxide detector activation, no CO	12.9	49.85	1.92	64.67
361 Swimming/recreational water areas rescue		47.1	16.5	63.6
815 Severe weather or natural disaster standby			63.58	63.58
542 Animal rescue	7.16	27.2	25.92	60.28
481 Attempt to burn	4.92	39.13	16.2	60.25
422 Chemical spill or leak	5.06	62.22	0.63	57.91
365 Watercraft rescue	1.15	17.43	39.2	57.78
911 Citizen complaint	1.33	33.18	20.72	55.23
173 Cultivated trees or nursery stock fire	15.04	22.43	11.59	49.06
715 Local alarm system, malicious false alarm	6.98	24.79	16.86	47.63
421 Chemical hazard (no spill or leak)		40.5	1.34	41.84
731 Sprinkler activation due to malfunction	12.32	21.69	5.78	39.79
138 Off-road vehicle or heavy equipment fire		8.29	24.61	32.9
812 Flood assessment		32.61		32.61
123 Fire in portable building, fixed location		12.58	17.99	30.57
471 Explosive, bomb removal (for bomb scare, use 721)	5.41	24.71		30.12
734 Heat detector activation due to malfunction	5.55	23.69	0.76	30
251 Excessive heat, scorch burns with no ignition		26.44	3.27	29.71
423 Refrigeration leak		25.54	1.97	27.51
443 Light ballast breakdown	8.06	17.76	1.4	27.22
354 Trench/below grade rescue		25.23		25.23
340 Search, other		8.6	15	23.6
521 Water evacuation	8.78	12.1		20.88
721 Bomb scare - no bomb	5.19	14.77		19.96
356 High angle rescue		9.86	9.84	19.7
3 Rescue & Emergency Medical Service Incidents	0.59	18.91		19.5
462 Aircraft standby		16.17	3.17	19.34
117 Commercial Compactor fire, confined to rubbish			18.36	18.36
714 Central station, malicious false alarm	0.66	10.27	6.5	17.43



Incident Type	Ceres	Modesto	Stanislaus	Total
200 Overpressure rupture, explosion, overheat other		16.45		16.45
331 Lock-in (if lock out, use 511)	1.89	12.62	1.93	16.44
240 Explosion (no fire), other	4.92	9.66	1.52	16.1
116 Fuel burner/boiler malfunction, fire confined		14.25	1.66	15.91
621 Wrong location	1.54	8.85	5.49	15.88
120 Fire in mobile prop. used as a fixed struc., other	10.2	5.3		15.5
460 Accident, potential accident, other		9.24	6.12	15.36
540 Animal problem, other	10.64	2.54	0.36	13.54
136 Self-propelled motor home or recreational vehicle	3.62	9.44		13.06
320 Emergency medical service, other (conversion only)	2.93	8.48	1.62	13.03
751 Biological Hazard, Malicious False Report		11.94		11.94
134 Water vehicle fire		6.05	5.88	11.93
153 Construction or demolition landfill fire		11.59		11.59
355 Confined space rescue			11.32	11.32
742 Extinguishing system activation	7.69	2.97		10.66
351 Extrication of victim(s) from building/structure		9.77	0.67	10.44
512 Ring or jewelry removal	0.45	9.76		10.21
482 Threat to burn		9.62		9.62
155 Outside stationary compactor/compacted trash fire			8.52	8.52
541 Animal problem		8.28		8.28
221 Overpressure rupture of air or gas pipe/pipeline		8.25		8.25
152 Garbage dump or sanitary landfill fire	1.23		6.17	7.4
133 Rail vehicle fire	7.18			7.18
732 Extinguishing system activation due to malfunction		6.05		6.05
172 Cultivated orchard or vineyard fire			5.18	5.18
632 Prescribed fire	1.07	2.86	0.93	4.86
357 Extrication of victim(s) from machinery		4.73		4.73
115 Incinerator overload or malfunction, fire confined			4.67	4.67
223 Air or gas rupture of pressure or process vessel		3.28		3.28
451 Biological Hazard, Confirmed or Suspected	1.92	0.86		2.78
712 Direct tie to FD, malicious/false alarm		2.58		2.58
243 Fireworks explosion (no fire)	0.44	0.77	1.02	2.23
813 Wind storm, tornado/hurricane assessment			2.2	2.2
800 Severe weather or natural disaster, other		1.25	0.73	1.98

Incident Type	Ceres	Modesto	Stanislaus	Totals
713 Telephone, malicious false alarm		1.45	0.29	1.74
212 Overpressure rupture of steam boiler			1.71	1.71
220 Overpressure rupture from air or gas, other		1.35		1.35
555 Defective elevator, no occupants			0.79	0.79
163 Outside gas or vapor combustion explosion		0.71		0.71
364 Surf rescue			0.51	0.51
56 Unauthorized burning		0.48		0.48
641 Vicinity alarm (incident in other location)	0.32			0.32
672 Biological Hazard Investigation, None Found		0.17		0.17
<b>Totals</b>	<b>15,410.26</b>	<b>95,190.18</b>	<b>14,145.61</b>	<b>124,746.05</b>

**2.2 Breakdown by Property Type**

The chart below illustrates the count for property types receiving services during the past three calendar years. Family residences, roads, and nursing homes make up the top property types.

*There are 88,814 Incident records being analyzed.*

**Table 4—Incidents: Count by Fire Department by Property Use**

Property Use	Ceres	Modesto	Stanislaus	Totals
419 1 or 2 family dwelling	7,334	30,749	5,193	43,276
429 Multifamily dwellings	792	7,007	349	8,148
- Blank -	311	6,073	1,036	7,420
962 Residential street, road or residential driveway	451	4,905	148	5,504
963 Street or road in commercial area	494	1,528	378	2,400
311 24-hour care Nursing homes, 4 or more persons	67	1,975	106	2,148
965 Vehicle parking area	267	1,426	33	1,726
961 Highway or divided highway	264	949	219	1,432
459 Residential board and care	133	1,143	73	1,349
960 Street, other	147	652	238	1,037
449 Hotel/motel, commercial	209	607	6	822
400 Residential, other	356	37	415	808
161 Restaurant or cafeteria	88	631	45	764
938 Graded and cared-for plots of land	22	699	22	743
519 Food and beverage sales, grocery store	69	606	61	736
580 General retail, other	24	587	12	623



Property Use	Ceres	Modesto	Stanislaus	Totals
931 Open land or field	108	321	168	597
700 Manufacturing, processing	42	151	342	535
599 Business office	46	454	21	521
215 High school/junior high school/middle school	139	327	55	521
322 Alcohol or substance abuse recovery center	229	173	1	403
213 Elementary school, including kindergarten	131	218	33	382
500 Mercantile, business, other	57	293	13	363
131 Church, mosque, synagogue, temple, chapel	46	254	55	355
100 Assembly, other	22	314	5	341
936 Vacant lot	62	199	62	323
900 Outside or special property, other	71	197	39	307
439 Boarding/rooming house, residential hotels	148	76	72	296
581 Department or discount store	66	168	7	241
511 Convenience store	55	169	17	241
340 Clinics, Doctor's offices, hemodialysis centers	23	215	1	239
946 Lake, river, stream	25	85	113	223
162 Bar or nightclub	23	157	14	194
571 Service station, gas station	55	107	22	184
460 Dormitory type residence, other	1	172		173
331 Hospital - medical or psychiatric	5	152	4	161
173 Bus station	4	152	1	157
888 Fire station	61	38	57	156
241 Adult education center, college classroom	24	128		152
150 Public or government, other	71	74	3	148
655 Crops or orchard	9	16	120	145
891 Warehouse	23	18	90	131
951 Railroad right of way	23	74	25	122
579 Motor vehicle or boat sales, services, repair	19	54	24	97
300 Health care, detention, & correction, other	6	83	2	91
549 Specialty shop	17	66	4	87
342 Doctor, dentist or oral surgeon's office	12	74	1	87
361 Jail, prison (not juvenile)	37	41	8	86
321 Mental retardation/development disability facility	43	41	1	85
141 Athletic/health club	16	65		81

Property Use	Ceres	Modesto	Stanislaus	Totals
539 Household goods, sales, repairs	22	30	22	74
124 Playground	29	6	35	70
592 Bank	5	50	6	61
940 Water area, other	18	20	21	57
200 Educational, other	19	31	1	51
569 Professional supplies, services	11	37	2	50
365 Police station	21	19	7	47
808 Outbuilding or shed	9	24	13	46
557 Personal service, including barber & beauty shops	7	36		43
341 Clinic, clinic-type infirmary	11	23	9	43
PROPERTY USE	7	7	28	43
921 Bridge, trestle	11	24	7	42
151 Library		33	2	35
110 Fixed use recreation places, other	10	13	11	34
529 Textile, wearing apparel sales	3	21	7	31
174 Rapid transit station		31		31
984 Industrial plant yard - area	5	23	1	29
882 Parking garage, general vehicle		19	9	28
111 Bowling alley		28		28
983 Pipeline, power line or other utility right of way	2	2	23	27
323 Asylum, mental institution		26	1	27
155 Courthouse		26		26
926 Outbuilding, protective shelter	4	14	7	25
559 Recreational, hobby, home repair sales, pet store	8	16	1	25
183 Movie theater		20	5	25
343 Hemodialysis unit	13	11		24
122 Convention center, exhibition hall	3	17	4	24
UUU Undetermined		11	11	22
807 Outside material storage area	3	7	12	22
160 Eating, drinking places	8	12	1	21
120 Variable use amusement, recreation places	5	11	5	21
899 Residential or self-storage units	6	12	2	20
800 Storage, other	6	13	1	20
254 Day care, in commercial property	3	16	1	20



Property Use	Ceres	Modesto	Stanislaus	Totals
210 Schools, non-adult	3	15	2	20
123 Stadium, arena	3	16	1	20
121 Ballroom, gymnasium	2	17	1	20
564 Laundry, dry cleaning	2	15	1	18
211 Preschool	1	16	1	18
170 Passenger terminal, other		16		16
981 Construction site	1	14		15
880 Vehicle storage, other	5	9	1	15
363 Reformatory, juvenile detention center		15		15
181 Live performance theater		15		15
919 Dump, sanitary landfill	5	3	6	14
881 Parking garage, (detached residential garage)	1	10	3	14
144 Casino, gambling clubs		2	12	14
130 Places of worship, funeral parlors		14		14
140 Clubs, other	4	8	1	13
134 Funeral parlor		13		13
142 Clubhouse	1	11		12
NNN None		6	5	11
819 Livestock, poultry storage	4	2	5	11
669 Forest, timberland, woodland	3	2	6	11
659 Livestock production	3	1	7	11
600 Utility, defense, agriculture, mining, other	4	4	2	10
596 Post office or mailing firms	1	5	4	10
639 Communications center		7	2	9
464 Barracks, dormitory		9		9
182 Auditorium or concert hall	4	5		9
648 Sanitation utility	1	6	1	8
593 Office: veterinary or research	5	2	1	8
972 Aircraft runway		7		7
647 Water utility	1	4	2	7
974 Aircraft loading area		5		5
952 Railroad yard		4	1	5
332 Hospices		5		5
152 Museum	1	4		5

Property Use	Ceres	Modesfo	Stanislaus	Totals
935 Campsite with utilities			4	4
839 Refrigerated storage		2	2	4
842 Electrical distribution		4		4
640 Utility or Distribution system, other		3	1	4
629 Laboratory or science laboratory		2	2	4
180 Studio/theater, other		4		4
113 Electronic amusement center		2	1	3
112 Billiard center, pool hall		3		3
973 Aircraft taxi-way		2		2
937 Beach			2	2
849 Outside storage tank	1	1		2
845 Flammable liquid distribution, pipeline, flammable		1	1	2
644 Gas distribution, pipeline, gas distribution	1	1		2
615 Electric generating plant		1	1	2
610 Energy production plant, other		2		2
129 Amusement center: indoor/outdoor		2		2
115 Roller rink: indoor or outdoor		1	1	2
982 Oil or gas field			1	1
898 Dock, marina, pier, wharf			1	1
635 Computer center		1		1
255 Day care, in residence, licensed		1		1
171 Airport passenger terminal		1		1
116 Swimming facility: indoor or outdoor		1		1
<b>Totals</b>	<b>13,051</b>	<b>65,711</b>	<b>10,052</b>	<b>88,814</b>



The chart below lists the same annual Property Type breakdown but this time total staff hours are displayed. Here, Property Type rankings by staff hours remain fairly consistent with ranking by property type frequency:

*There are 88,814 Incident records being analyzed.*

**Table 5—Incidents: Total Staff Hours by Fire Department by Property Use**

Property Use	Ceres	Modesto	Stanislaus	Totals
419 1 or 2 family dwelling	7,595.93	48,767.37	6,554.77	62,918.07
429 Multifamily dwellings	752.23	9,700.23	296.74	10,749.20
962 Residential street, road or residential driveway	780	5,982	180.73	6,942.73
961 Highway or divided highway	780.06	2,502.81	541.58	3,824.45
931 Open land or field	433.8	2,218.74	955.04	3,607.58
- Blank -	65.4	2,544.54	462.08	3,072
963 Street or road in commercial area	615.72	1,842.97	605.88	3,064.57
311 24-hour care Nursing homes, 4 or more persons	35.58	1,896.12	95.45	2,027.15
965 Vehicle parking area	260.04	1,408.11	34.07	1,702.22
938 Graded and cared-for plots of land	33.64	1,433.83	61.98	1,529.65
960 Street, other	237.56	793.92	437.57	1,469.05
161 Restaurant or cafeteria	154.86	1,065.85	56.4	1,277.11
459 Residential board and care	120.53	979.35	58.13	1,158.01
900 Outside or special property, other	162.09	831.13	152.13	1,145.35
448 Hotel/motel, commercial	243.49	874.74	12.43	1,130.66
946 Lake, river, stream	91.75	645.65	377.89	1,115.29
580 General retail, other	18.59	910.17	122.9	1,051.66
936 Vacant lot	196.51	681.17	163.76	1,041.44
599 Business office	50.96	982.43	19.66	1,033.05
400 Residential, other	391.15	172.19	369.46	932.8
700 Manufacturing, processing	65.49	359.25	498.67	923.41
519 Food and beverage sales, grocery store	69.18	787.25	43.56	899.99
500 Mercantile, business, other	78.06	801.87	13.18	893.11
808 Outbuilding or shed	85.42	455.42	100.86	641.7
131 Church, mosque, synagogue, temple, chapel	36.82	464.03	41.71	542.56
215 High school/junior high school/middle school	114.49	309.15	41.75	465.39
213 Elementary school, including kindergarten	114.39	243.27	31.24	388.9
579 Motor vehicle or boat sales, services, repair	57.75	240.28	87.58	385.59

Property Use	Ceres	Modesto	Stanislaus	Totals
331 Hospital - medical or psychiatric	2.07	362.24	5.54	369.85
655 Crops or orchard	21.03	13.78	326.87	361.68
100 Assembly, other	79.03	263.33	2.96	345.32
549 Specialty shop	30.05	262.83	48.52	341.4
511 Convenience store	124.46	173.85	24.52	322.83
881 Parking garage, (detached residential garage)	29.69	226.63	59.45	315.77
581 Department or discount store	75.75	215.04	5.79	296.58
891 Warehouse	61.88	90.72	137.57	290.15
340 Clinics, Doctor's offices, hemodialysis centers	18.62	264.54	0.51	283.67
951 Railroad right of way	97.62	134.66	49.11	281.39
150 Public or government, other	75.84	188.39	1.55	265.78
888 Fire station	142.55	36.27	86.46	265.28
669 Forest, timberland, woodland	154.76	3.24	105.88	263.88
162 Bar or nightclub	30.36	203.78	13.29	247.43
322 Alcohol or substance abuse recovery center	116.67	129.43	0.53	246.63
940 Water area, other	42.54	88.34	106.01	236.89
241 Adult education center, college classroom	14.63	209.96		224.59
439 Boarding/rooming house, residential hotels	82.05	56.42	51.8	190.27
926 Outbuilding, protective shelter	18.04	136.2	32.66	186.9
800 Storage, other	5.52	117.31	50.28	173.11
571 Service station, gas station	49.01	102.92	16.43	168.36
592 Bank	4.73	126.5	19.03	150.26
361 Jail, prison (not juvenile)	34.15	103.51	9.04	146.7
807 Outside material storage area	14.12	60.02	64.72	138.86
460 Dormitory type residence, other	0.56	129.56		130.12
600 Utility, defense, agriculture, mining, other	81.92	20.88	21.26	124.06
984 Industrial plant yard - area	15.23	98.81	0.57	114.61
529 Textile, wearing apparel sales	1	99.21	5.37	105.58
300 Health care, detention, & correction, other	3.53	96.41	0.59	100.53
PROPERTY USE	19.55	18.59	58.03	96.17
569 Professional supplies, services	8.01	85.22	2.19	95.42
659 Livestock production	5.25	10	79.18	94.43
173 Bus station	4.07	88.27	0.33	92.67
200 Educational, other	9.62	81.04	0.74	91.4



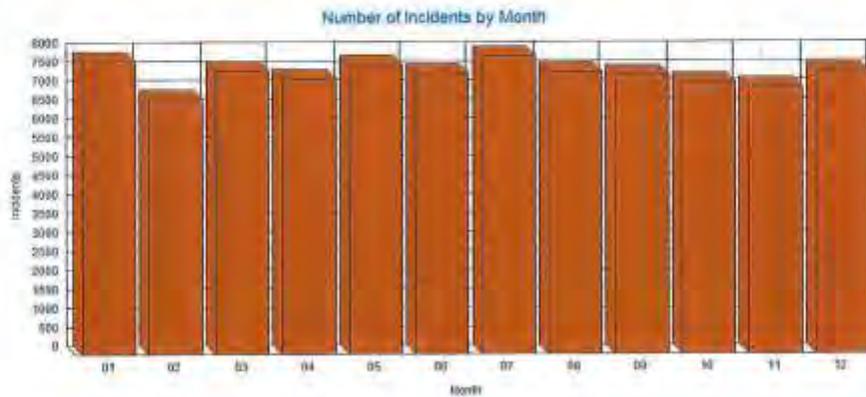
Property Use	Ceres	Modesto	Stanislaus	Totals
141 Athletic/health club	20.32	69.94		90.26
880 Vehicle storage, other	25.41	41.27	23.02	89.7
539 Household goods, sales, repairs	18.43	25.6	40.8	84.83
899 Residential or self-storage units	4.52	76.61	2.22	83.35
342 Doctor, dentist or oral surgeon's office	5.84	69.86	0.27	75.97
919 Dump, sanitary landfill	11.25	26.37	31.21	68.83
124 Playground	34.43	4.83	25.61	64.87
321 Mental retardation/development disability facility	26.98	35.93	0.57	63.48
557 Personal service, including barber & beauty shops	7.76	54.55		62.31
559 Recreational, hobby, home repair sales, pet store	7.59	47.2	0.34	55.13
921 Bridge, trestle	8.45	32.47	11.05	51.97
981 Construction site	1.47	48.84		50.31
819 Livestock, poultry storage	1.71	1.23	47.28	50.22
882 Parking garage, general vehicle		27.04	19.08	46.12
365 Police station	16.12	22.67	5.98	44.77
596 Post office or mailing firms	0.75	36.94	2.52	40.21
110 Fixed use recreation places, other	8.88	13.96	15.83	36.67
983 Pipeline, power line or other utility right of way	3.27	1.44	29.68	34.39
123 Stadium, arena	5.2	27.26	0.59	33.05
111 Bowling alley		32.06		32.06
564 Laundry, dry cleaning	9.12	20.84	0.37	30.33
323 Asylum, mental institution		28.6	0.74	29.34
151 Library		27.04	1.28	28.32
254 Day care, in commercial property	1.38	26.24	0.59	28.21
341 Clinic, clinic-type infirmary	5.07	16.81	4.7	26.58
155 Courthouse		26.54		26.54
140 Clubs, other	8	10.26	6.95	25.21
UUU Undetermined		11.34	12.96	24.3
639 Communications center		22.58	1.29	23.87
122 Convention center, exhibition hall	3.09	17.6	3.08	23.77
120 Variable use amusement, recreation places	6.26	14.4	3.04	23.7
343 Hemodialysis unit	11.73	11.3		23.03
849 Outside storage tank	8.05	13.26		21.33
174 Rapid transit station		21.1		21.1

Property Use	Ceres	Modesto	Stanislaus	Totals
130 Places of worship, funeral parlors		18.73		18.73
647 Water utility	9.75	5	3.33	18.08
183 Movie theater		13.9	2.92	16.82
363 Reformatory, juvenile detention center		16.66		16.66
211 Preschool	0.28	15.21	0.7	16.19
121 Ballroom, gymnasium	1.31	13.3	1.18	15.79
210 Schools, non-adult	1.73	11.94	1.14	14.81
181 Live performance theater		14.61		14.61
593 Office: veterinary or research	5.23	8.99	0.81	13.03
160 Eating, drinking places	4.7	7.59	0.52	12.81
180 Studio/theater, other		11.85		11.85
134 Funeral parlor		11.07		11.07
648 Sanitation utility	6.9	4.41	0.54	10.85
NNN None		3.48	7.03	10.51
182 Auditorium or concert hall	3.51	6.93		10.44
142 Clubhouse	0.26	10.07		10.33
935 Campsite with utilities			9.57	9.57
629 Laboratory or science laboratory		8.4	0.91	9.31
972 Aircraft runway		9.17		9.17
170 Passenger terminal, other		8.73		8.73
898 Dock, marina, pier, wharf			8.27	8.27
144 Casino, gambling clubs		1.33	6.34	7.67
152 Museum	2.02	5.41		7.43
464 Barracks, dormitory		6.73		6.73
642 Electrical distribution		6.46		6.46
640 Utility or Distribution system, other		4.52	0.52	5.04
332 Hospices		4.88		4.88
952 Railroad yard		3.45	0.78	4.23
973 Aircraft taxi-way		3.38		3.38
112 Billiard center, pool hall		3.18		3.18
839 Refrigerated storage		2.43	0.69	3.12
644 Gas distribution, pipeline, gas distribution	0.91	2.19		3.1
974 Aircraft loading area		2.64		2.64
937 Beach			2.6	2.6

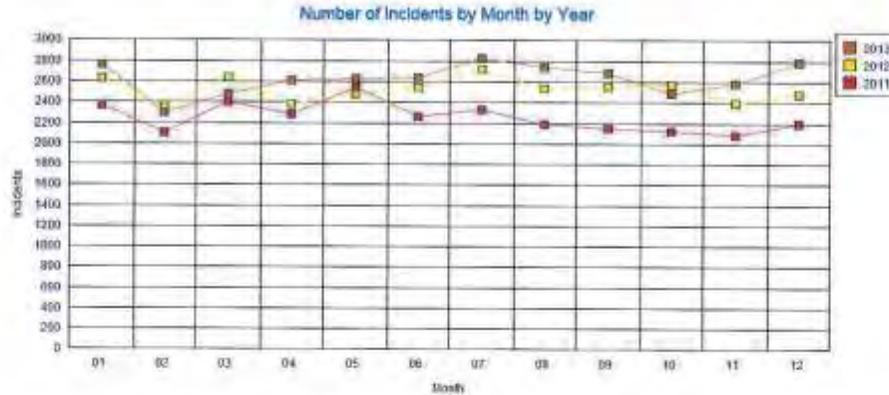
Property Use	Ceres	Modesto	Stanislaus	Totals
610 Energy production plant, other		2.21		2.21
113 Electronic amusement center		1.52	0.32	1.84
645 Flammable liquid distribution, pipeline, flammable		0.62	1.15	1.77
129 Amusement center: indoor/outdoor		1.67		1.67
115 Roller rink: indoor or outdoor		0.84	0.31	1.15
171 Airport passenger terminal		0.95		0.95
615 Electric generating plant		0.38	0.47	0.85
116 Swimming facility: indoor or outdoor		0.77		0.77
635 Computer center		0.75		0.75
982 Oil or gas field			0.5	0.5
255 Day care, in residence, licensed		0.11		0.11
<b>Totals</b>	<b>15,410.26</b>	<b>95,190.18</b>	<b>14,145.61</b>	<b>124,746.05</b>

**2.3 Monthly Incident Demand**

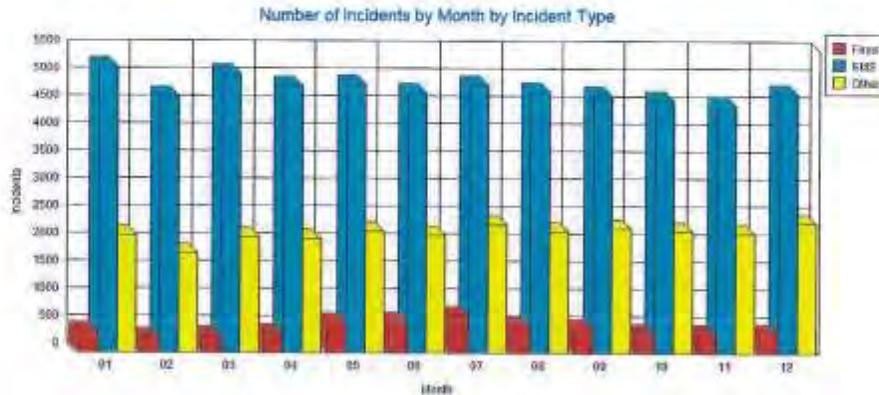
Monthly variations in the number of incidents tend to be minimal with a slight decrease in February.



This graph illustrates the increase in the number of incidents year to year. The greatest increase seems to be in the latter half of the year.



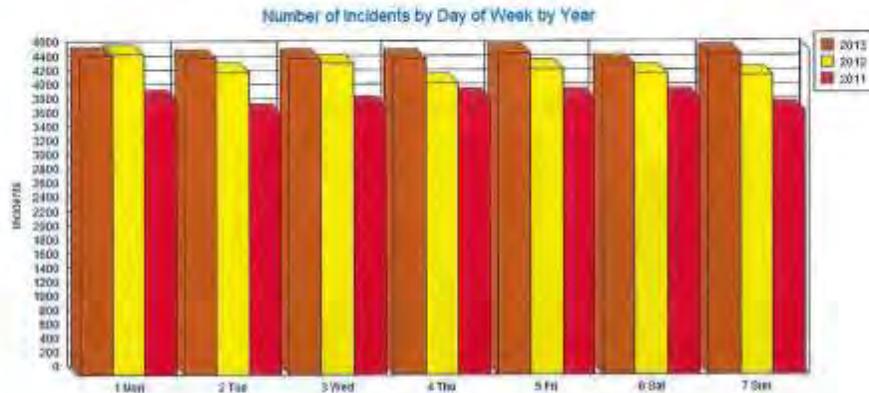
This breakdown illustrates an interesting trend in the number of fire incidents. While fire incidents are a lower percentage than EMS or Other types, they do tend to increase noticeably in the spring and summer months.



This graph compares incident activity by hour of day. The graph follows traditional fire department activity hours. Notice activity increases are tending to be greater in late morning through early evening hours.



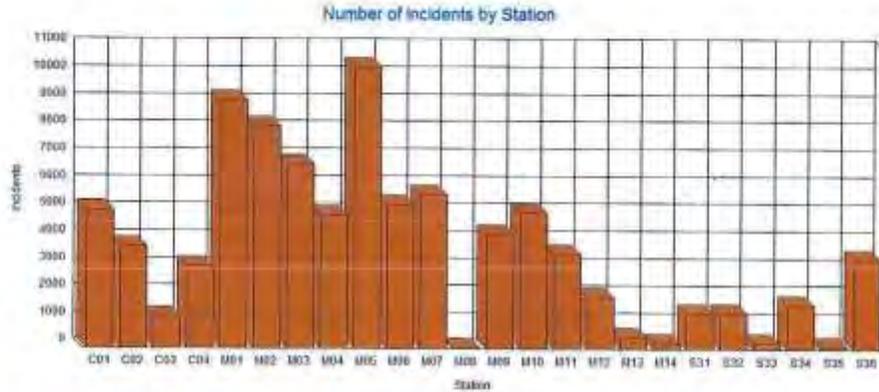
Incident activity by day of week remains fairly consistent during the work week with a substantial increase from year to year.



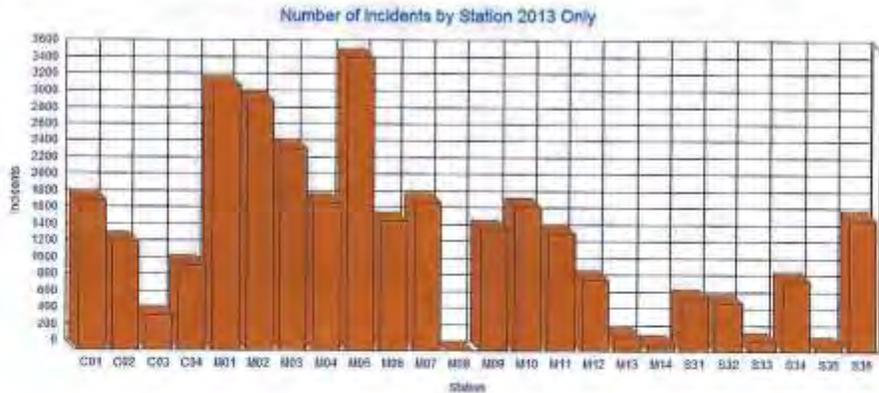
**2.4 Demand by Station Area**

The graph below illustrates incident volume by station for the past 3 years.

- ◆ Ceres = C
- ◆ Modesto = M
- ◆ Stanislaus = S



Here is the same graph illustrating the same station volume comparison for 2013 only.



While Station M08 is closed, several other fire stations show significantly fewer incidents than others.



### 2.5 Dollar Loss Incidents

Here is a breakdown of the number of dollar loss incidents by year from 2011 through 2013. Modesto's Station M01 and M10 have the highest counts of dollar loss incidents.

*There are 2,391 Incident records being analyzed.*

**Table 6—Incidents: Count by Year by Station**

City	Station	2011	2012	2013	Totals
Ceres	C01	40	36	32	108
	C02	26	31	35	92
	C03	7	4	8	19
	C04	16	19	20	55
Modesto	M01	100	102	109	311
	M02	56	58	104	218
	M03	44	30	44	118
	M04	45	43	39	127
	M05	74	84	78	237
	M06	62	52	31	145
	M07	47	35	23	105
	M08	1			1
	M09	37	48	41	126
	M10	134	121	69	324
	M11	20	24	46	90
	M12	6	24	30	60
	M13	2	6	8	16
	M14	1	3	4	8
Stanislaus	S31	5	21	31	57
	S32	2	14	18	34
	S33		9	8	17
	S34	5	23	32	60
	S35			4	4
	S36	5	23	31	59
	<b>Totals</b>	<b>735</b>	<b>810</b>	<b>846</b>	<b>2,391</b>

The chart below illustrates total dollar loss by station by year. Modesto's Station 02 has the highest amount of dollar loss.

*There are 2,391 Incident records being analyzed.*

**Table 7—Incidents: Total Loss by Year by Station**

City	Station	2011	2012	2013	Totals
Ceres	C01	551,345	746,765	237,951	1,536,061
	C02	583,000	940,365	390,550	1,913,915
	C03	32,100	166,500	13,500	212,100
	C04	280,455	224,430	83,672	588,557
Modesto	M01	2,442,403	1,314,713	1,501,216	5,258,332
	M02	1,009,317	1,375,093	2,941,290	5,325,700
	M03	486,912	635,375	1,351,252	2,473,539
	M04	409,470	545,076	1,245,523	2,200,069
	M05	1,450,026	900,249	1,132,473	3,482,748
	M06	624,388	837,702	244,525	1,706,615
	M07	1,168,237	483,493	142,050	1,793,780
	M08	500			500
	M09	187,162	176,958	1,286,773	1,650,893
	M10	1,425,186	1,635,750	1,690,405	4,751,341
	M11	66,903	269,256	993,646	1,329,805
	M12	177,703	350,698	428,852	957,253
	M13	5,202	37,104	188,304	230,610
	M14	40,000	8,000	95,600	144,600
Stanislaus	S31	270,300	1,054,062	605,000	1,929,362
	S32	3,000	140,100	451,950	595,050
	S33		703,200	161,725	864,925
	S34	62,900	114,425	1,135,553	1,312,878
	S35			54,000	54,000
	S36	140,500	420,730	562,165	1,123,395
	<b>Totals</b>	<b>11,417,009</b>	<b>13,081,044</b>	<b>16,937,975</b>	<b>41,436,028</b>

Using the same set of records, here is a breakdown of dollar loss by incident type:

*There are 2,391 Incident records being analyzed.*

**Table 8—Incidents: Total Loss by Year by Incident Type**

Incident Type	2011	2012	2013	Totals
100 Fire, other	155,653	19,411	110,895	285,959
111 Building fire	9,734,701	11,072,514	13,400,018	34,207,233
112 Fires in structures other than in a building	79,902	364,152	74,400	518,454
113 Cooking fire, confined to container	34,433	61,537	60,543	156,513
114 Chimney or flue fire, confined to chimney or flue	454	4,604	1,902	6,960
116 Fuel burner/boiler malfunction, fire confined		1,050		1,050
117 Commercial Compactor fire, confined to rubbish			5,000	5,000
118 Trash or rubbish fire, contained	4,172	8,145	6,702	19,019
120 Fire in mobile prop. used as a fixed struc., other			22,300	22,300
121 Fire in mobile home used as fixed residence	5,450	20,000	5	25,455
122 Fire in motor home, camper, recreational vehicle	87,500	62,800	206,500	356,800
123 Fire in portable building, fixed location	300	200	5,100	5,600
130 Mobile property (vehicle) fire, other	32,301	112,003	137,101	281,405
131 Passenger vehicle fire	697,208	902,493	897,628	2,497,329
132 Road freight or transport vehicle fire	269,500	163,601	734,701	1,167,802
133 Rail vehicle fire	5,000			5,000
134 Water vehicle fire	7,000	1,500		8,500
136 Self-propelled motor home or recreational vehicle			4,250	4,250
137 Camper or recreational vehicle (RV) fire		51,000	27,800	78,800
138 Off-road vehicle or heavy equipment fire	40,501	8,150	804,700	853,351
140 Natural vegetation fire, other	9,431	5,274	4,407	19,112
141 Forest, woods or wildland fire	4			4
142 Brush, or brush and grass mixture fire	3,320	6,416	9,203	18,939
143 Grass fire	11,866	60,325	19,462	91,653
150 Outside rubbish fire, other	9,433	11,005	13,876	34,314
151 Outside rubbish, trash or waste fire	58,605	25,827	60,418	144,850
153 Construction or demolition landfill fire		500		500
154 Dumpster or other outside trash receptacle fire	28,066	29,012	107,731	164,809
160 Special outside fire, other	10,305	32,730	27,102	70,137
161 Outside storage fire	26,003	2,052	27,677	55,732

Incident Type	2011	2012	2013	Totals
162 Outside equipment fire	2,351	25,801	52,600	80,752
163 Outside gas or vapor combustion explosion		100		100
170 Cultivated vegetation, crop fire, other		5,500	20,000	25,500
171 Cultivated grain or crop fire			45,000	45,000
173 Cultivated trees or nursery stock fire		4,100		4,100
200 Overpressure rupture, explosion, overheat other		1,000		1,000
240 Explosion (no fire), other	70,000			70,000
321 EMS call, excluding vehicle accident with injury	25,000		101	25,101
322 Vehicle accident with injuries			12,200	12,200
324 Motor vehicle accident no injuries			1,000	1,000
440 Electrical wiring/equipment problem, other		10,020		10,020
445 Arcing, shorted electrical equipment	200			200
480 Attempted burning, illegal action, other	1,000			1,000
522 Water or steam leak			35,000	35,000
550 Public service assistance, other	1,000			1,000
551 Assist police or other governmental agency		8,000		8,000
553 Public service	250	2		252
561 Unauthorized burning			150	150
600 Good intent call, other			2	2
611 Dispatched & canceled en route	5,500			5,500
651 Smoke scare, odor of smoke	600		2,701	3,301
700 False alarm or false call, other		20		20
900 Special type of incident, other		200		200
<b>Totals</b>	<b>11,417,009</b>	<b>13,081,044</b>	<b>16,937,975</b>	<b>41,436,028</b>

## 2.6 Simultaneous Analysis

Simultaneous incidents occur when other incidents are underway at the time the incident occurs. Simultaneous incidents have the most impact when they occur with the same station area.

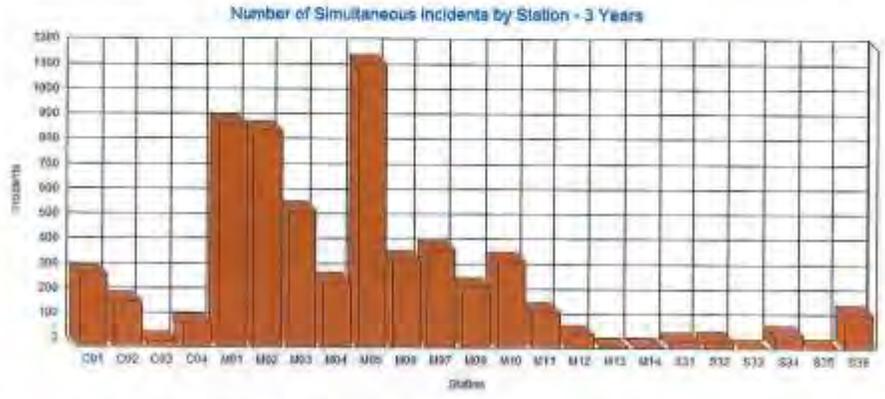
The chart below shows the number of simultaneous incidents by Station by Year. Modesto fire stations, especially Station M05, are most likely to experience simultaneous incident activity.

*There are 6,130 Incident records being analyzed.*

**Table 9—Simultaneous Incidents: Count by Year by Station**

City	Station	2011	2012	2013	Totals
Ceres	C01	76	100	115	291
	C02	55	81	67	183
	C03	9	6	10	24
	C04	39	23	34	96
Modesto	M01	291	280	325	896
	M02	225	274	372	871
	M03	143	165	243	551
	M04	80	89	96	265
	M05	386	389	363	1,138
	M06	135	123	95	353
	M07	109	137	147	393
	M09	69	81	96	246
	M10	99	138	113	350
	M11	32	41	72	145
	M12	6	19	31	56
	M13	3	2	2	7
	M14		3	1	4
	Stanislaus	S31	1	10	18
S32		2	19	10	31
S33			1	1	2
S34			22	35	57
S35		1		1	2
S36		2	68	70	140
	<b>Totals</b>	<b>1,762</b>	<b>2,051</b>	<b>2,317</b>	<b>6,130</b>

This graph shows the number of simultaneous incidents by station area over the three-year study period.



**2.7 Aid Activity with Other Jurisdictions**

The table below shows aid activity for 2013. Aid incidents account for a very small percentage of incidents in each fire department.

Here is a breakdown by aid type by year:

*There are 31,515 Incident records being analyzed.*

**Table 10—Incidents: Count by Aid Type**

Aid Type	Ceres	Modesto	Stantislous	Totals
1 Received	31	85	118	234
2 Automatic Aid Received	32	54	153	239
3 Given	159	73	113	345
4 Automatic Aid Given	88	78	69	215
5 Other Aid Given		4	2	6
N None	4,283	22,127	3,515	29,925
N1		545		545
N2		6		6
<b>Totals</b>	<b>4,573</b>	<b>22,972</b>	<b>3,970</b>	<b>31,515</b>

### 2.8 Station Demand Percentage

Here is a summary for overall activity percentage by Station for all incidents in 2013. The percentage listed is the percentage likelihood a particular station is involved in an incident at any given time. This number considers not only the number of incidents, but also the length of incidents. The busiest stations are listed first.

The top five busiest fire stations are in Modesto.

*Report based on 31,218 Incidents from 1/1/2013 to 12/31/2013.*

**Table 11—Station Demand Spreadsheet**

Station	Overall	Incidents
M02	12.66%	2,994
M01	10.71%	3,169
M05	10.60%	3,502
M03	8.97%	2,417
M10	6.74%	1,716
C01	6.74%	1,802
M04	6.28%	1,769
M07	5.92%	1,781
M09	5.68%	1,455
S36	5.46%	1,574
C02	4.99%	1,295
M11	4.97%	1,395
M06	4.74%	1,551
S34	3.70%	838
M12	3.56%	852
C04	3.55%	1,027
S31	2.92%	637
S32	2.28%	578
C03	1.79%	418
M13	0.85%	174
S35	0.74%	68
S33	0.69%	117
M14	0.43%	84

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### 3. PERFORMANCE MEASUREMENTS

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Fire department performance is measured as the amount of time it takes to reach 90% compliance with three component tasks: (1) Call Handling; (2) Turnout; and (3) Travel. These three components can be combined into a "Call to Arrival" measurement.

Call Handling Time (or Call Processing Time) measures the time from the initial request for assistance until the apparatus is "toned-out" or dispatched. National standards establish 60 seconds as the goal for accomplishing Call Handling for 90% of emergency incidents.

Turnout Time measures the performance of the company from the time the company is notified of the emergency until the company begins "wheels-turning" to the scene. Again, national standards generally establish a 60-second goal for 90% of turnouts to emergency incidents. Practically, however, fire departments adopt goals from 60 seconds to 120 seconds for this component task.

Travel Time measures the performance of the company from the time it begins to move toward the incident until the company arrives on the scene of the incident. National standards favor a 4-minute (240-second) first company arrival to 90% of emergency incidents.

Note: 90% compliance is not the same as an average. It is possible to have an average of 90 seconds for a particular task while it may be well over 3 minutes for the task to be accomplished for 90% of emergency incidents. What causes a divergence between average and 90% compliance is consistency. Consider this example:

If 1,000 incidents have a Call Handling Time between 85 and 90 seconds, the Call Handling operation can be characterized as "consistent." In this case, the Call Handling average and 90% compliance can be similar. However, if Call Handling Time varies from 25 seconds to 240 seconds then the average may still be near 90 seconds while 90% compliance takes over 180 seconds (3 minutes). Consistency is a key element of contemporary performance measurements.

All measurements have been based on fire and EMS responses to, as far as possible, eliminate non-emergency incidents.

#### 3.1 Call Handling Time – Department-Wide

Fewer than 10% of incidents have timestamps for the time a request for assistance was received. The infrequent use of this timestamp makes Call Handling measurements volatile, but in general the timestamps available suggest Call Handling performance of approximately 3 minutes with Ceres having better performance and Stanislaus having poorer call handling performance.

Call Handling Time performance is well below national standards of 60 seconds:

**Table 12—Call Handling**

Year	Ceres	Modesto	Stanislaus
Overall	2:39	3:06	3:24
2011	2:49	3:30	3:57
2012	2:27	3:24	3:16
2013	2:39	2:55	3:18

While Call Handling for EMS incidents is around 3-minutes, Call Handling for fires is well over 3-minutes in Modesto and Stanislaus. This may suggest delays resolving the location of fires. Building fire Call Handling is under 3-minutes while Wildland fire Call Handling is over 4-minutes. Another factor may be delays caused by determining the apparatus to assign to non-building fire incidents.

There were too few Time of Call timestamps available for Ceres to determine any valid patterns.

### 3.2 Turnout Time

Turnout performance is well below national standards.

**Table 13—Turnout Time**

Year	Ceres	Modesto	Stanislaus
Overall	2:22	2:52	3:14
2011	2:30	3:00	
2012	2:25	2:53	3:13
2013	2:17	2:48	3:15

The best turnout times are in Ceres with poorer turnout times in Stanislaus. However, all three fire departments have turnout time performance far less than the 60 national standard, or a more practical measurement of 90% compliance in 2-minutes.

**3.3 Turnout Time by Station Area**

*There are 44,917 Incident records being analyzed.*

**Table 14—Incidents: 90% Performance Minutes by Year by Station (Turnout Time)**

City	Station	2011	2012	2013
Ceres	C01	2:31	2:30	2:14
	C02	2:11	2:05	2:02
	C03	2:35	2:26	2:23
	C04	2:39	2:34	2:32
Modesto	M01	3:03	3:01	3:06
	M02	2:54	2:54	2:45
	M03	2:55	2:30	2:43
	M04	3:08	3:09	2:39
	M05	2:46	2:43	2:34
	M06	3:01	2:45	2:52
	M07	2:54	2:49	2:34
	M09	3:06	2:54	3:05
	M10	2:57	3:10	2:45
	M11	3:34	3:09	2:48
	M12	2:39	2:53	2:41
	M13	3:35	3:09	3:08
	M14	2:35	2:29	3:41
	Stanislaus	S31	N/A	2:58
S32		N/A	3:16	3:06
S33		N/A	3:32	3:48
S34		N/A	2:59	2:59
S35		N/A	3:46	3:15
S36		N/A	3:28	3:25

### 3.4 Travel Time

Travel Time performance is also well below national standards.

**Table 15—Travel Time**

Year	Ceres	Modesto	Stanislaus
Overall	5:02	5:13	7:09
2011	5:53	6:00	8:35
2012	4:29	4:46	6:19
2013	4:33	4:47	6:24

Ceres and Modesto have similar Travel Time performance. Travel times in Stanislaus are nearly 2 minutes longer.

**3.5 Travel Time by Station Area**

*There are 55,437 Incident records being analyzed.*

**Table 16—Incidents: 90% Performance Minutes by Year by Station (Travel Time)**

City	Station	2011	2012	2013
Ceres	C01	5:35	4:16	4:18
	C02	5:53	4:48	4:54
	C03	6:48	5:03	4:53
	C04	5:53	4:11	4:26
Modesto	M01	8:00	4:34	4:40
	M02	5:43	4:35	4:29
	M03	6:00	4:21	4:42
	M04	6:00	4:35	4:10
	M05	5:36	4:21	4:35
	M06	6:00	4:34	4:17
	M07	6:08	4:52	4:58
	M09	6:10	5:25	
	M10	6:11	5:22	5:16
	M11	6:00	5:25	4:33
	M12	5:25	5:46	5:36
	M13	9:08	9:42	8:34
	M14	9:27	8:03	6:53
	Stanislaus	S31	7:34	6:12
S32		6:16	5:15	5:17
S33		3:52	6:23	7:01
S34		8:10	7:27	8:12
S35			14:08	14:24
S36		7:51	6:12	6:05
ST3*		8:43		

\* 2011 station reference.

**3.6 Call to Arrival Performance**

Given the fact that few timestamps exist for the time the call was received any analysis of Call to Arrival would be inaccurate.

A more accurate calculation would be Dispatch to Arrival since the time of dispatch is tracked consistently in the data. But again this calculation may not be accurate since apparatus without mobile data terminals fail to accurately record key timestamps.

**Table 17—Dispatch to Arrival**

Year	Ceres	Modesto	Stanislaus
Overall	6:14	6:48	8:44
2011	6:13	6:44	9:04
2012	6:16	6:52	8:32
2013	6:13	6:47	8:44

### 3.7 Effective Response Force

An Effective Response Force is defined as a team of Engine, Rescue and Chief vehicles arriving at the scene of a Building Fire. In order to accurately calculate ERF arrivals all timestamps of all vehicles must be accurate. Given current time stamping an accurate calculation of ERF is not possible.

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**CITYGATE ASSOCIATES, LLC**

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■ FOLSOM (SACRAMENTO), CA

MANAGEMENT CONSULTANTS ■

# Draft Report

■ ■

## STANDARDS OF COVER ASSESSMENT

# MODESTO REGIONAL FIRE AGENCY PARTNERS

*VOLUME 3 OF 3 –  
MAP ATLAS*

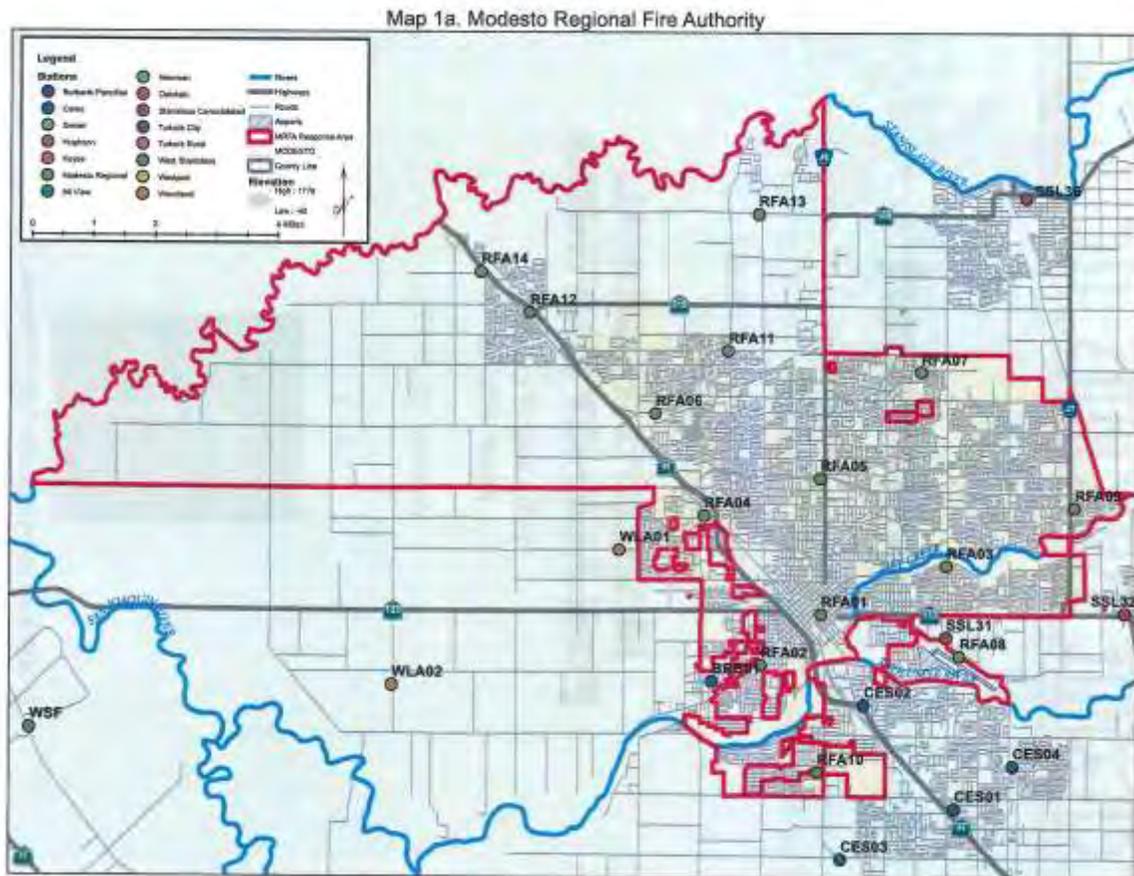
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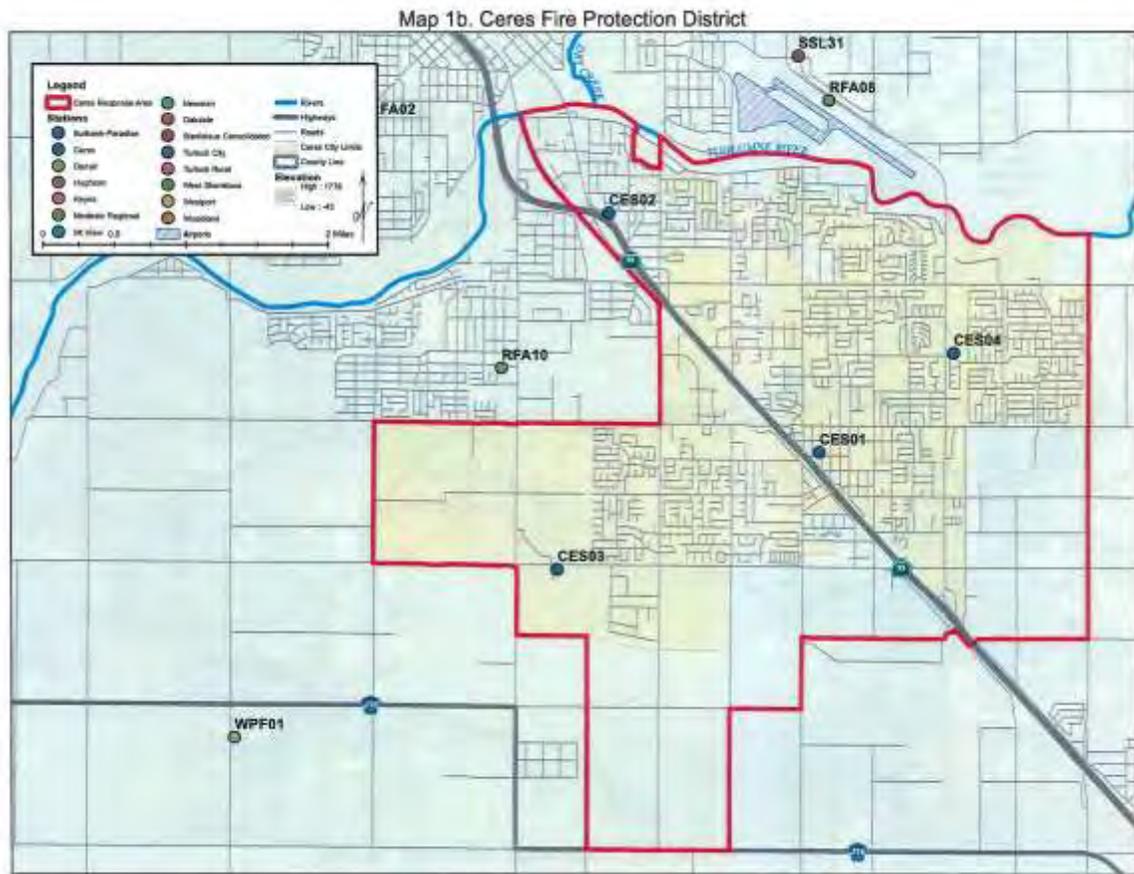
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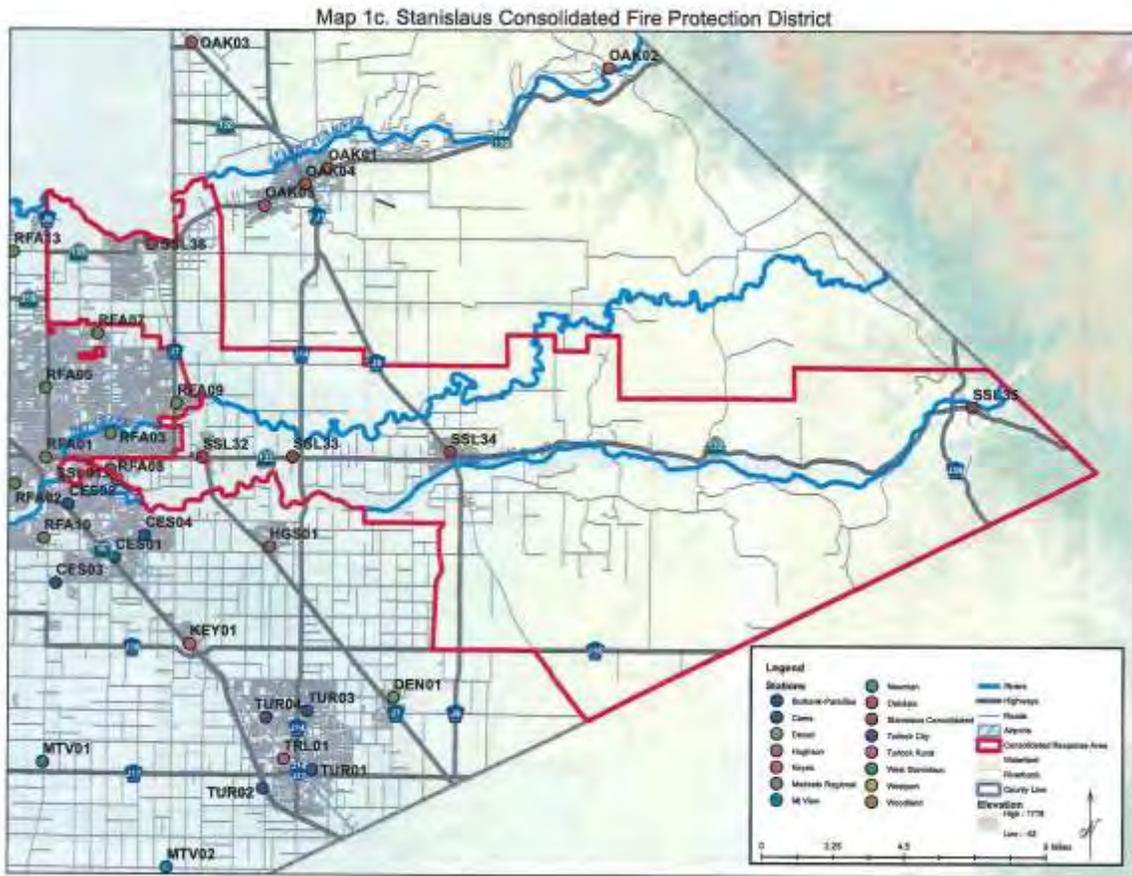


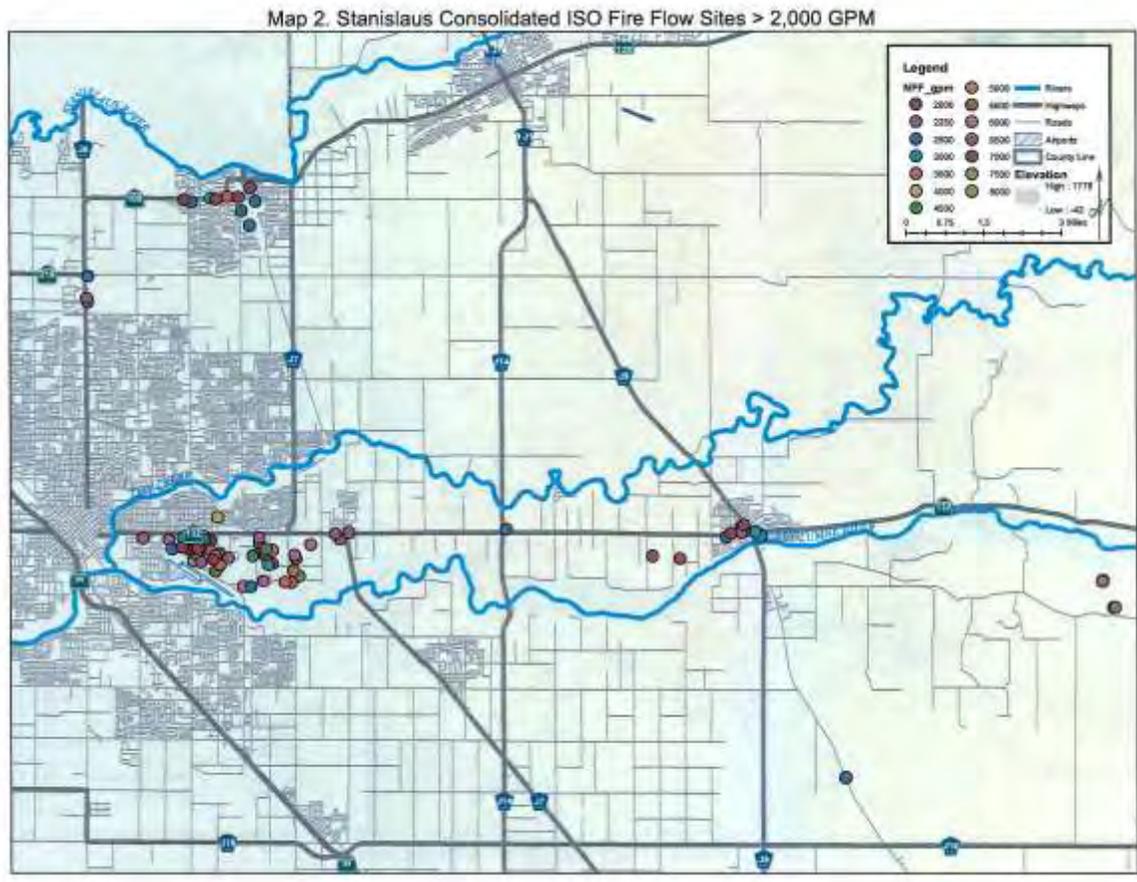
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(916) 458-5100 ■ Fax: (916) 983-2090

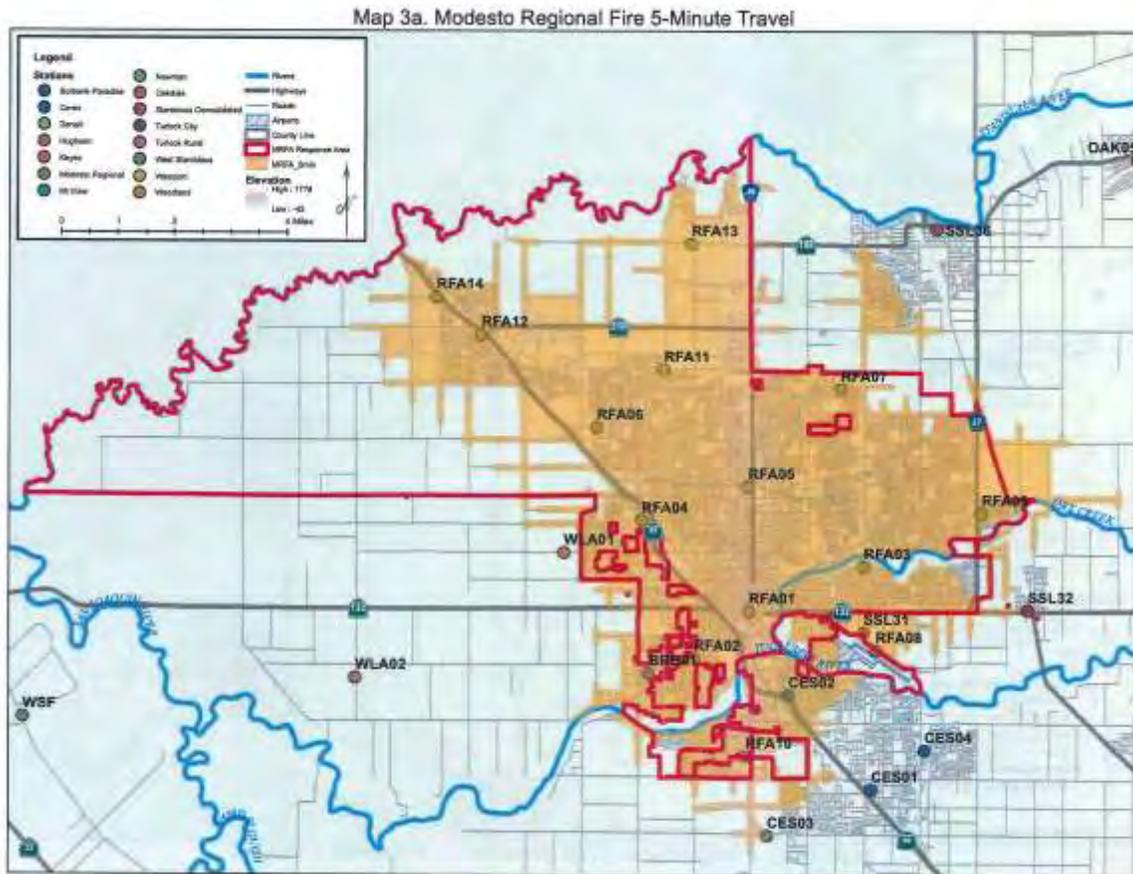


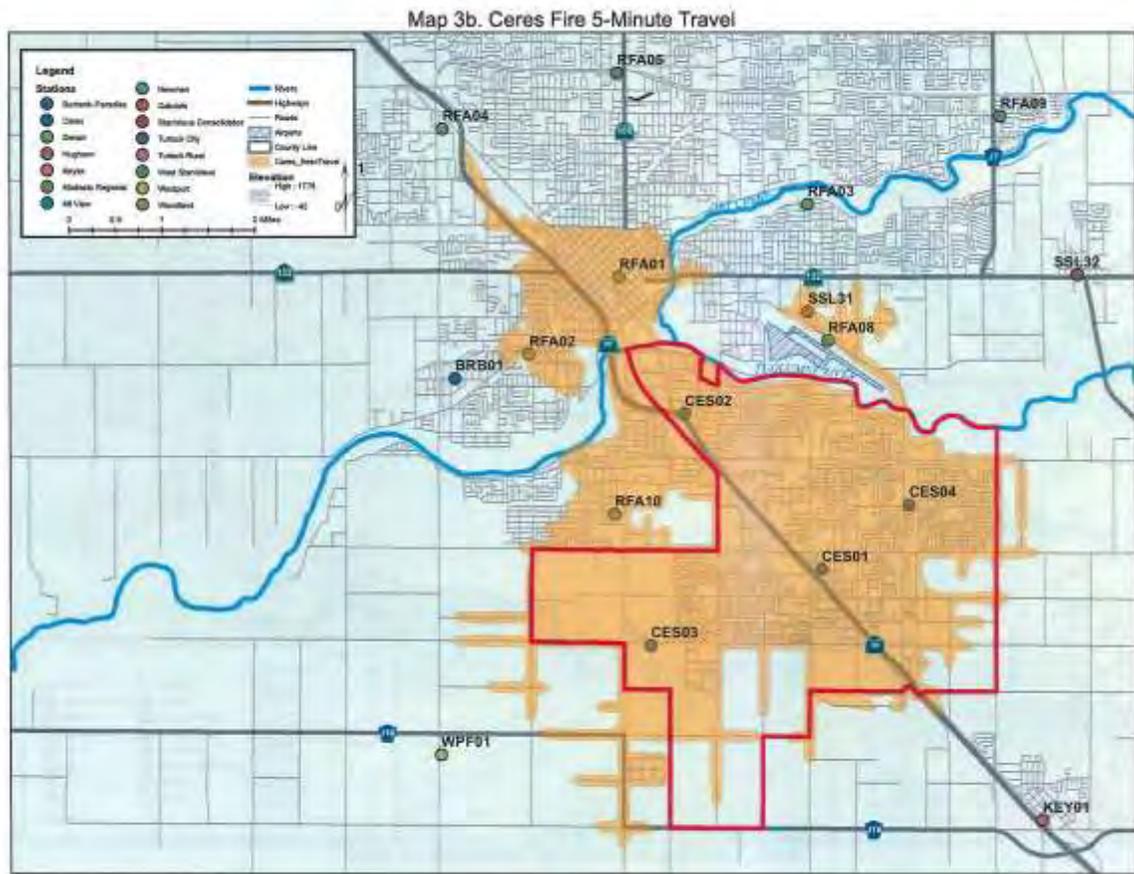




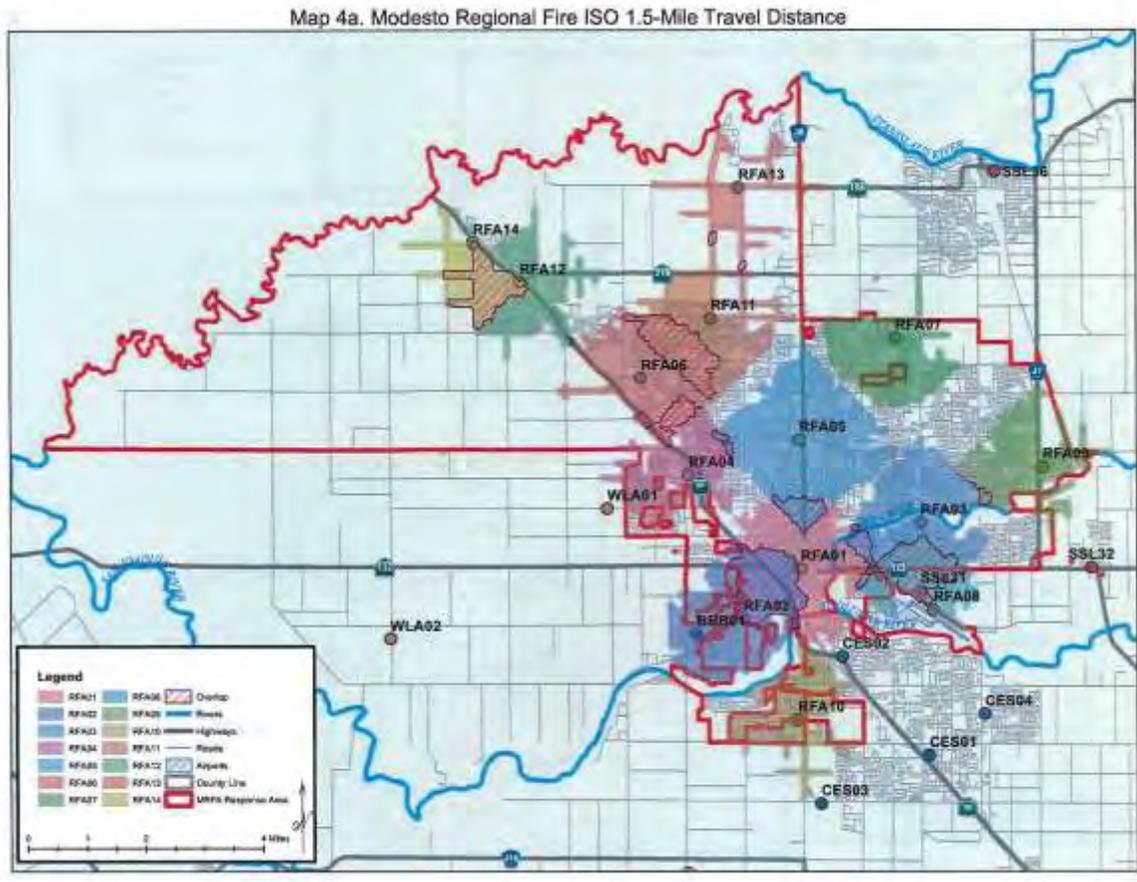


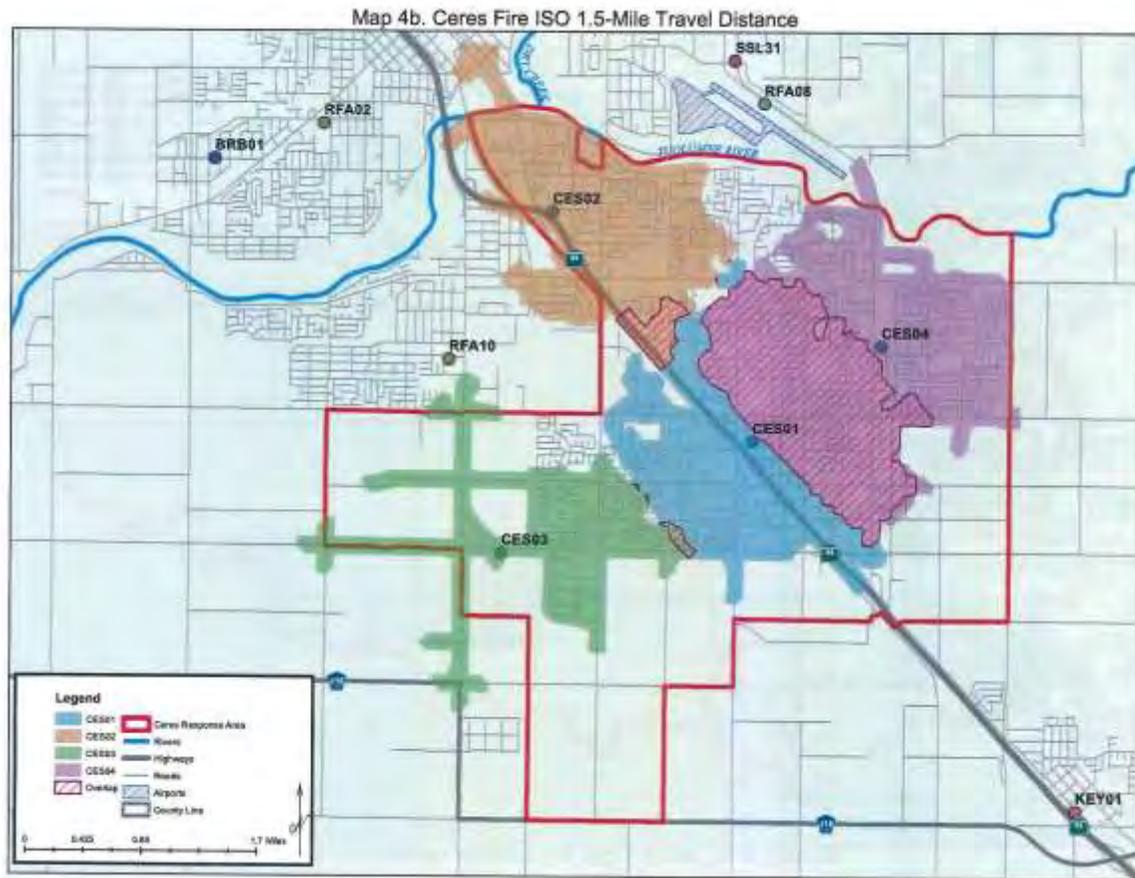


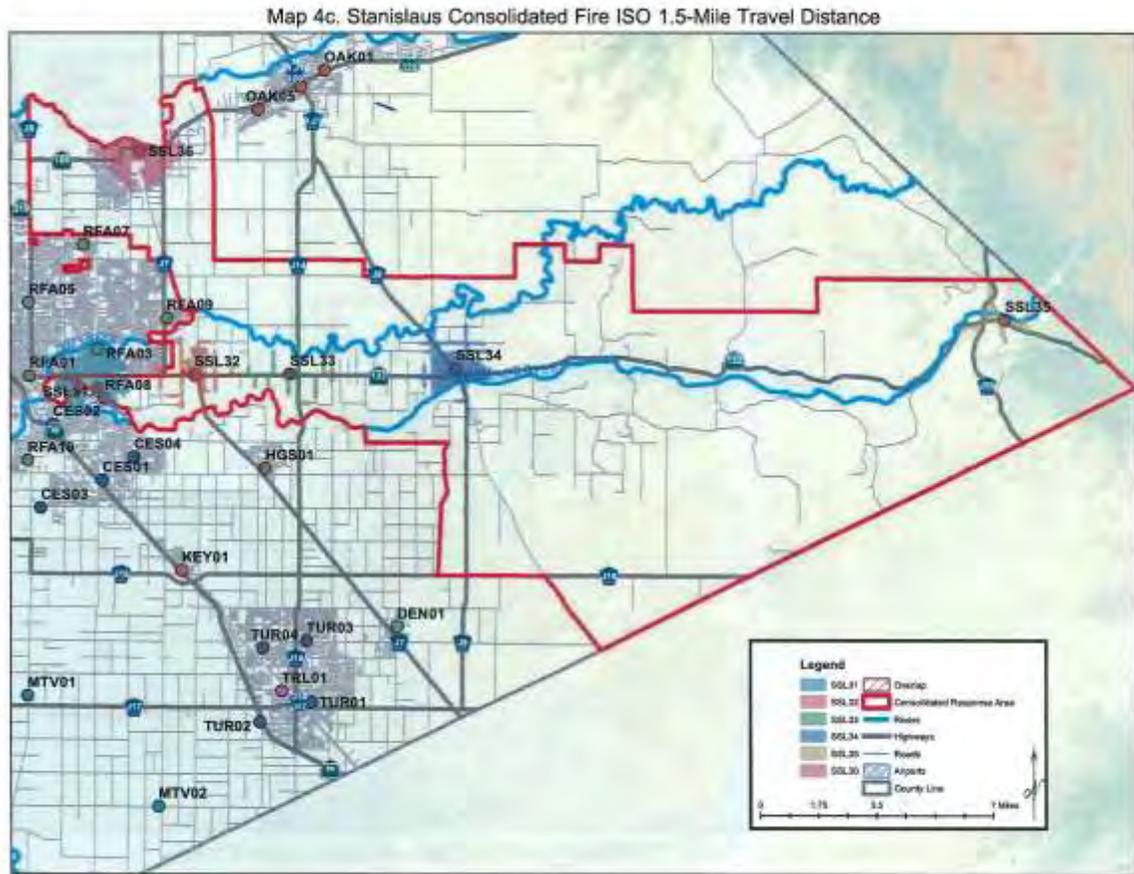


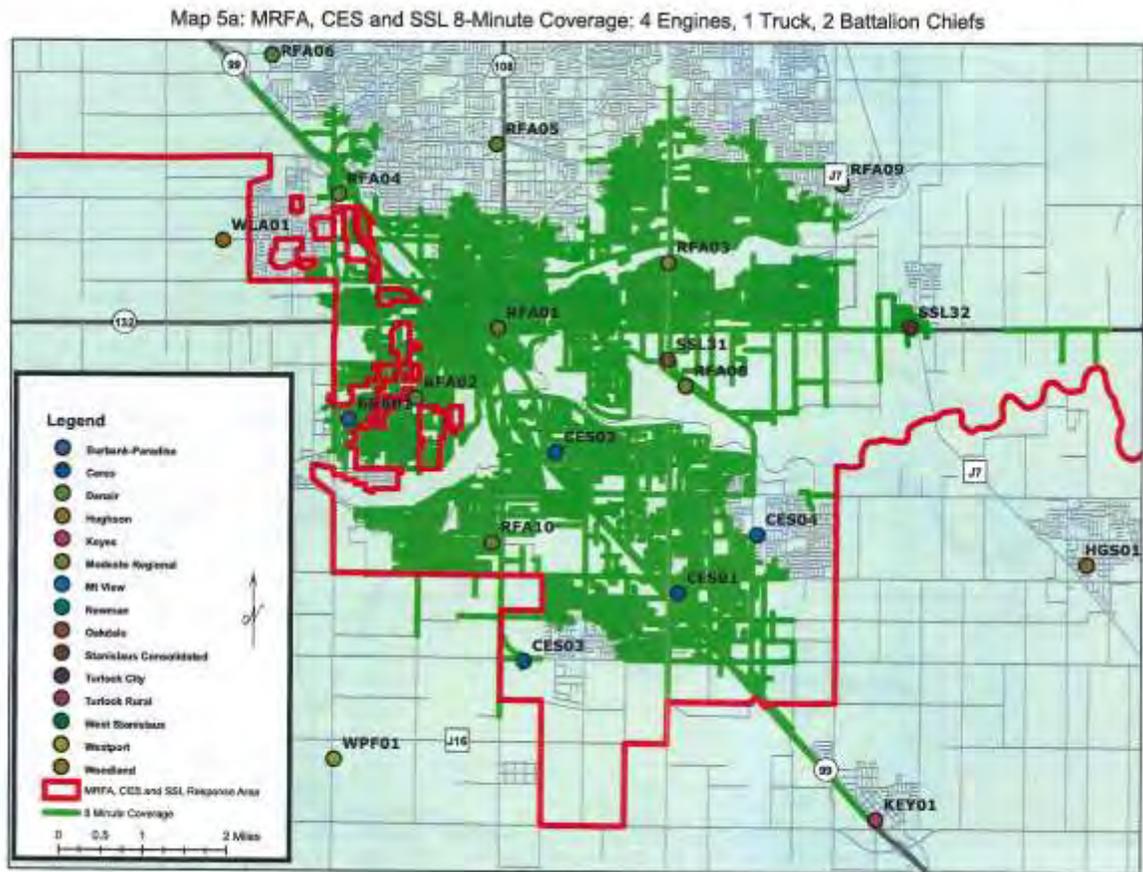


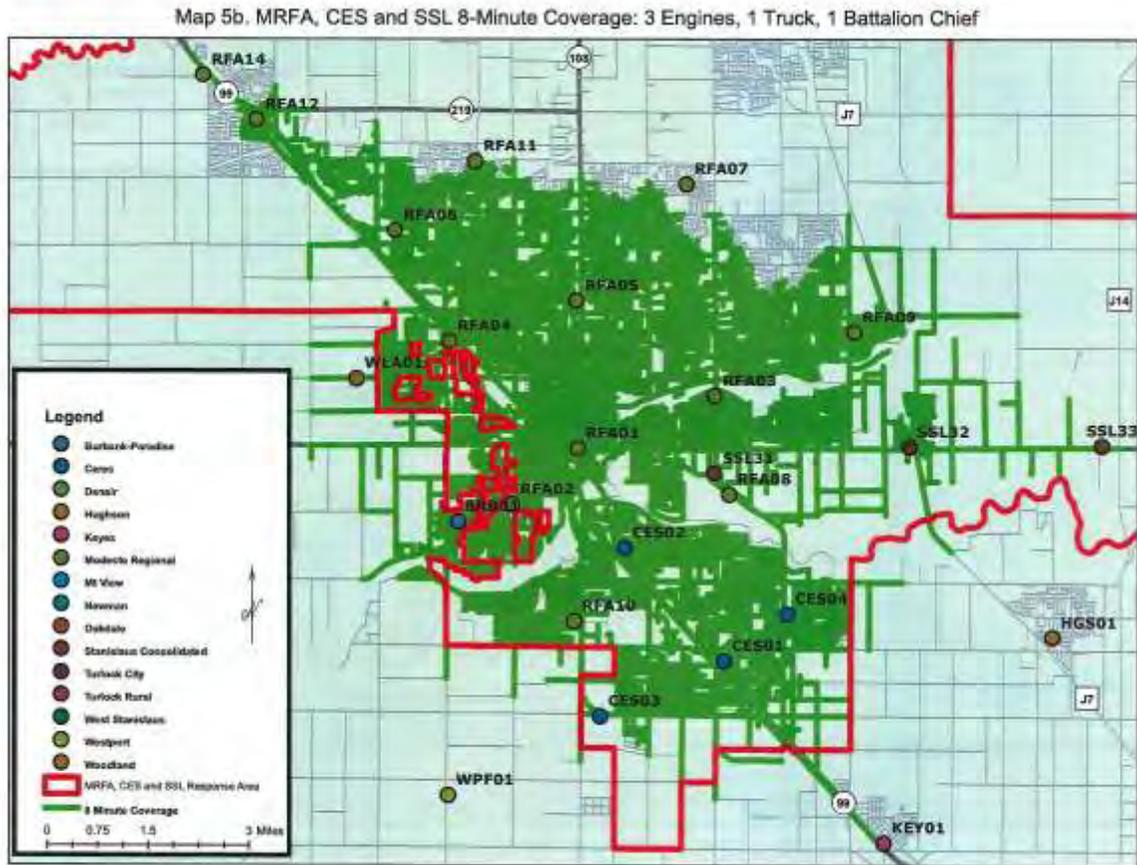


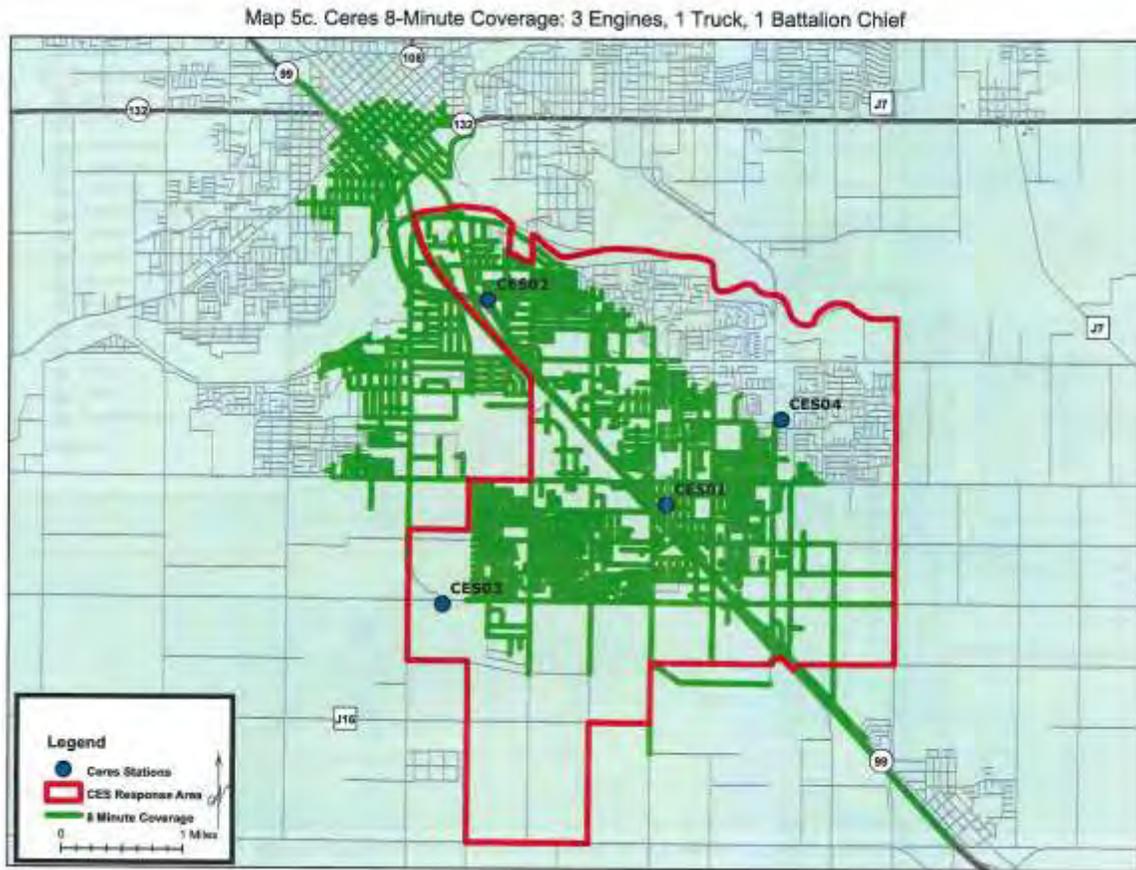




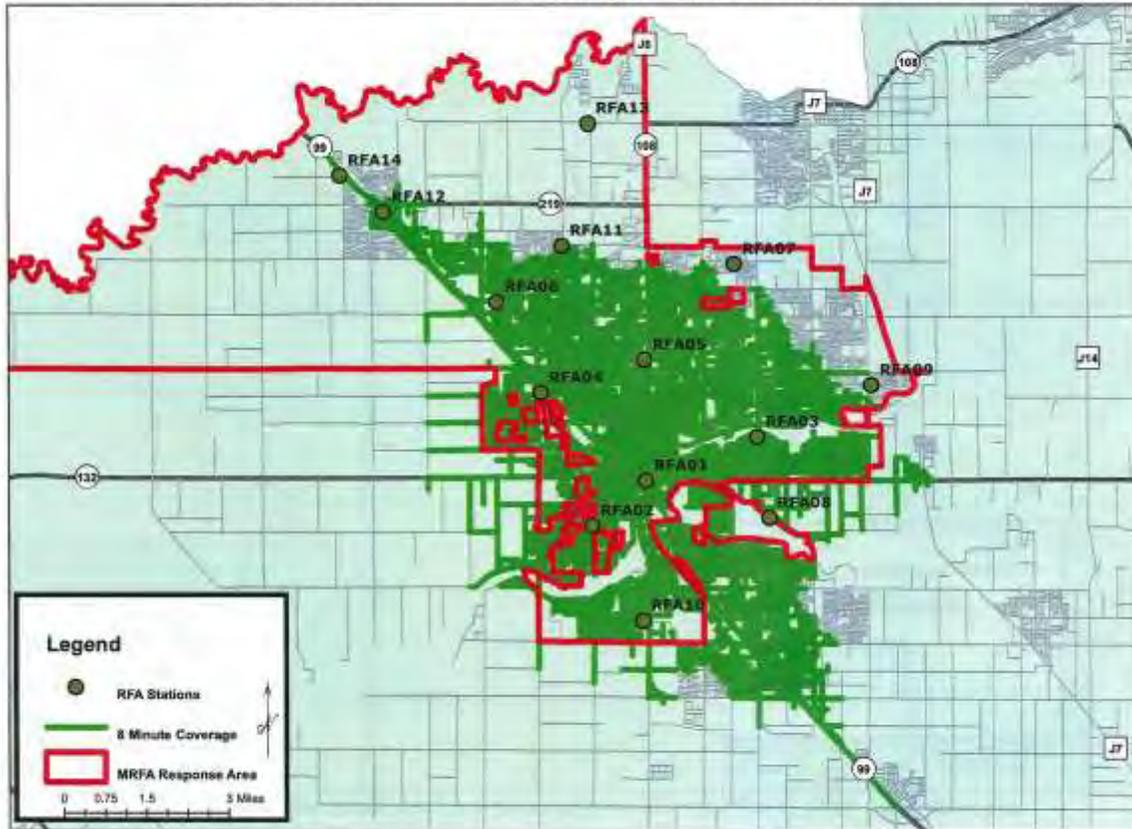


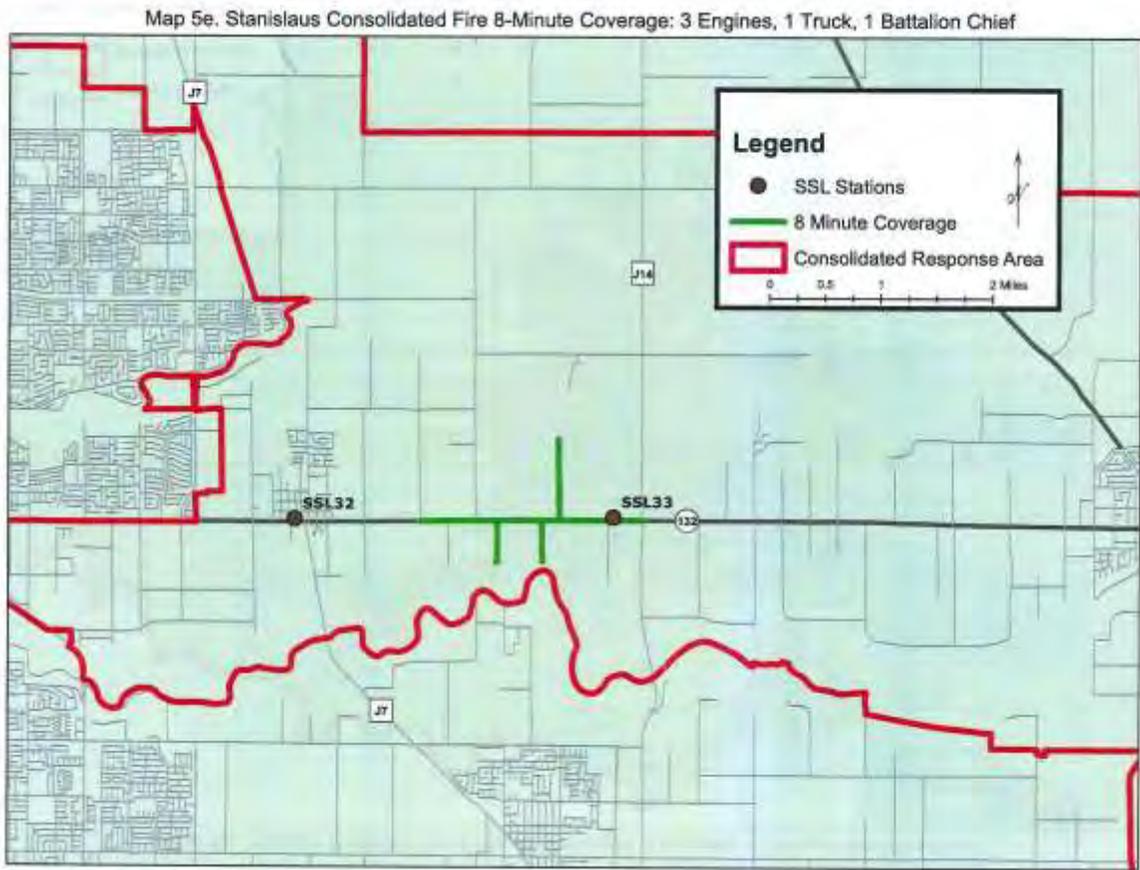


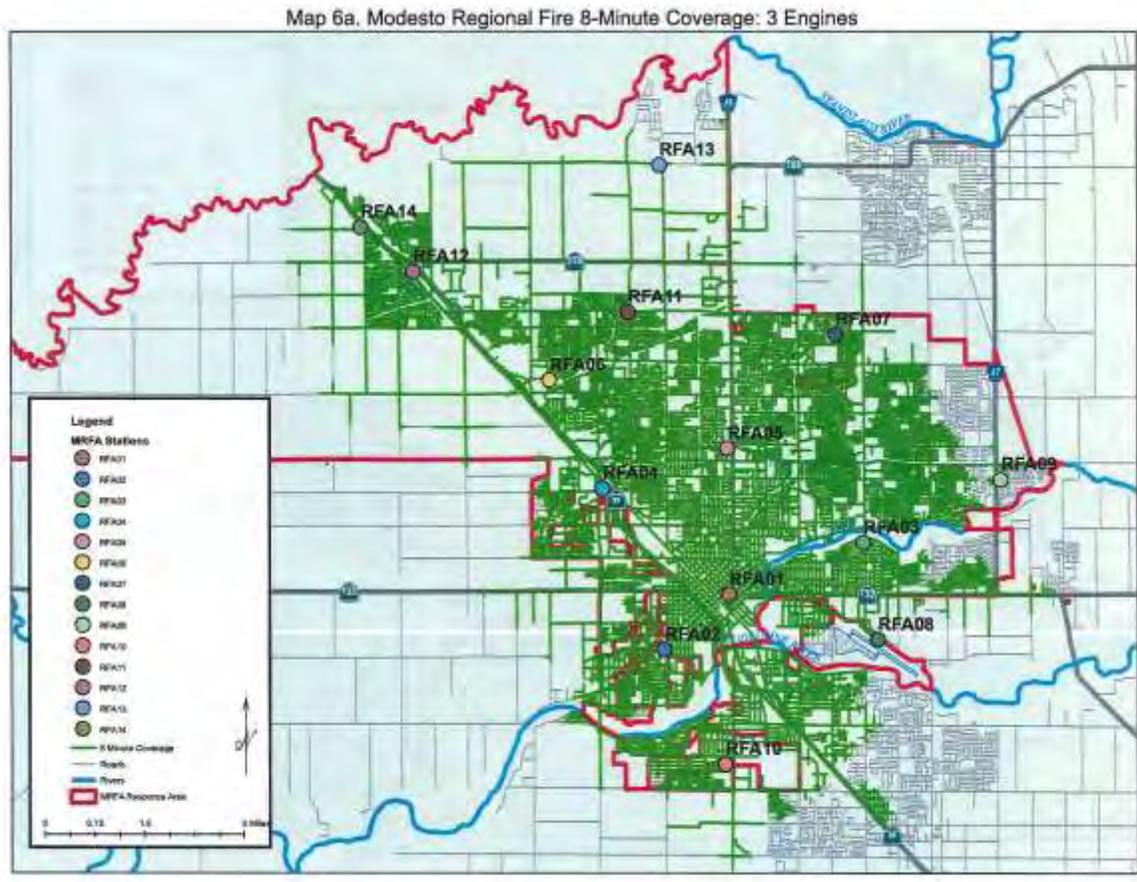


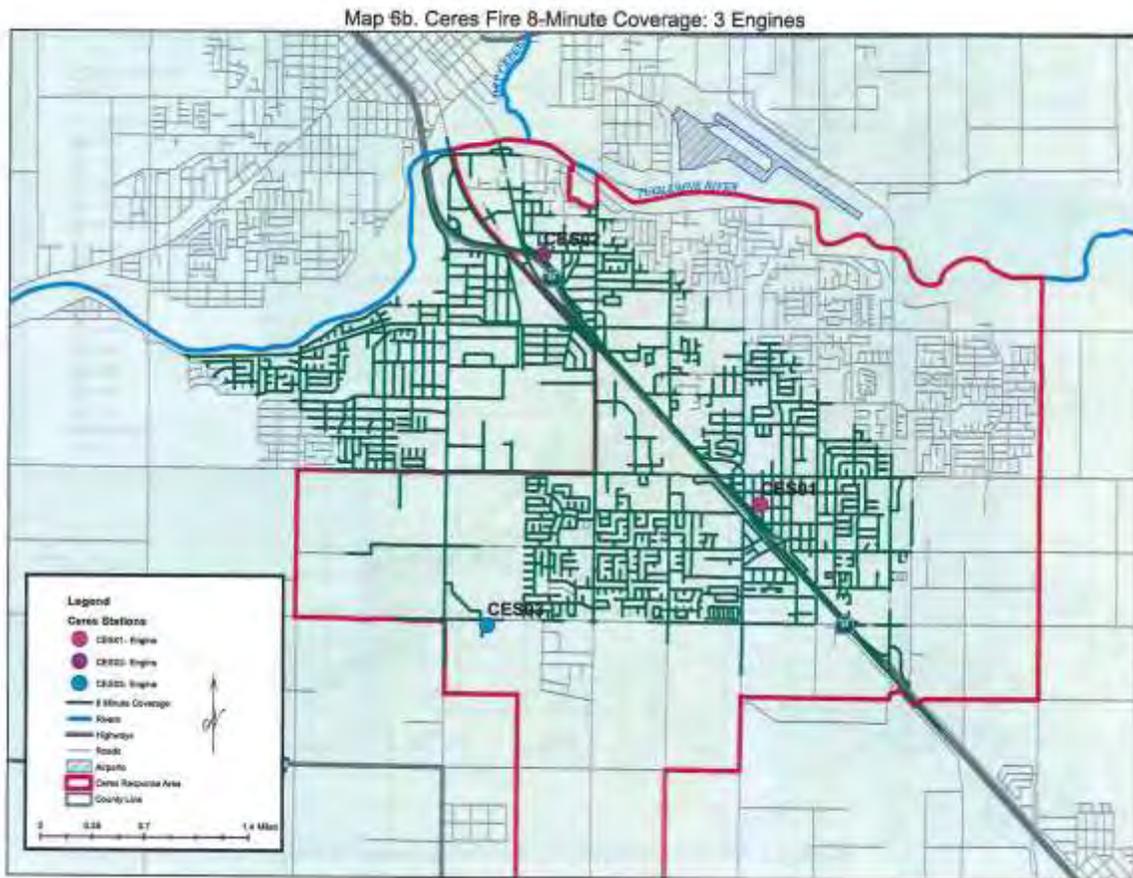


Map 5d. Modesto Regional Fire 8-Minute Coverage: 3 Engines, 1 Truck, 1 Battalion Chief

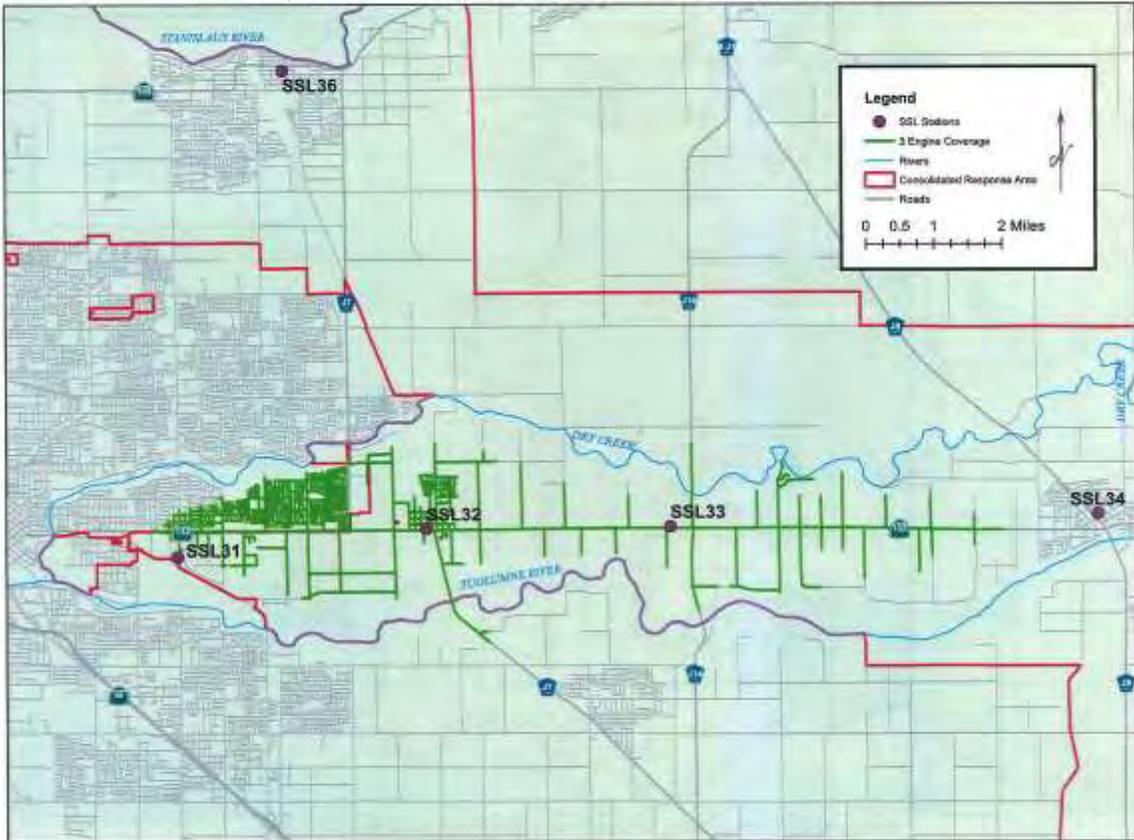


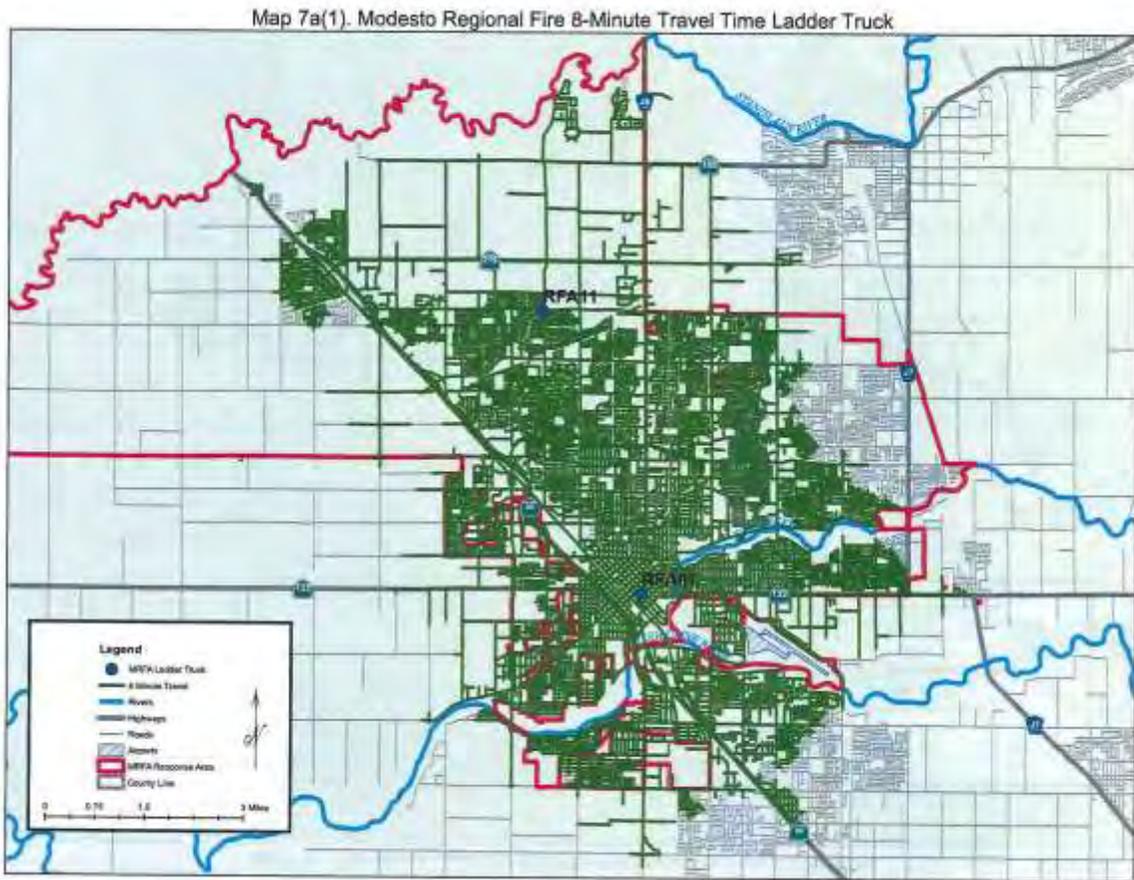


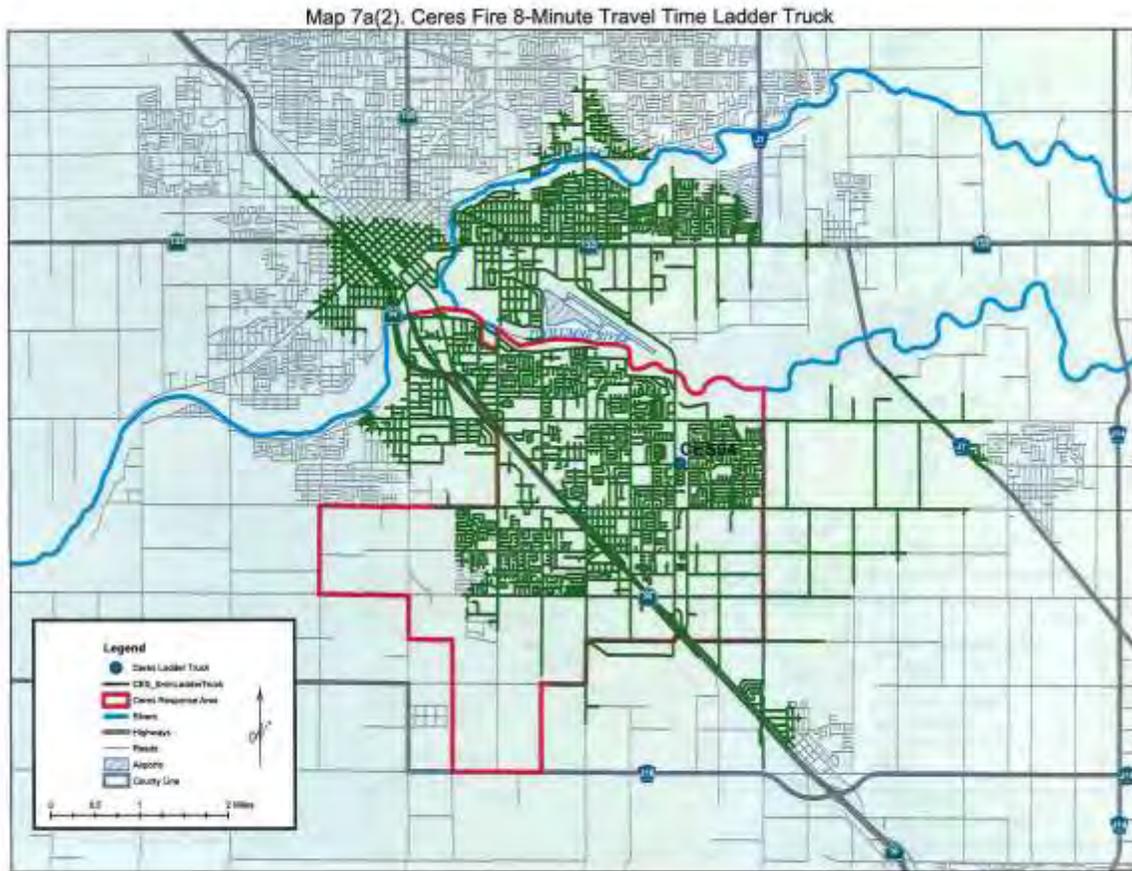




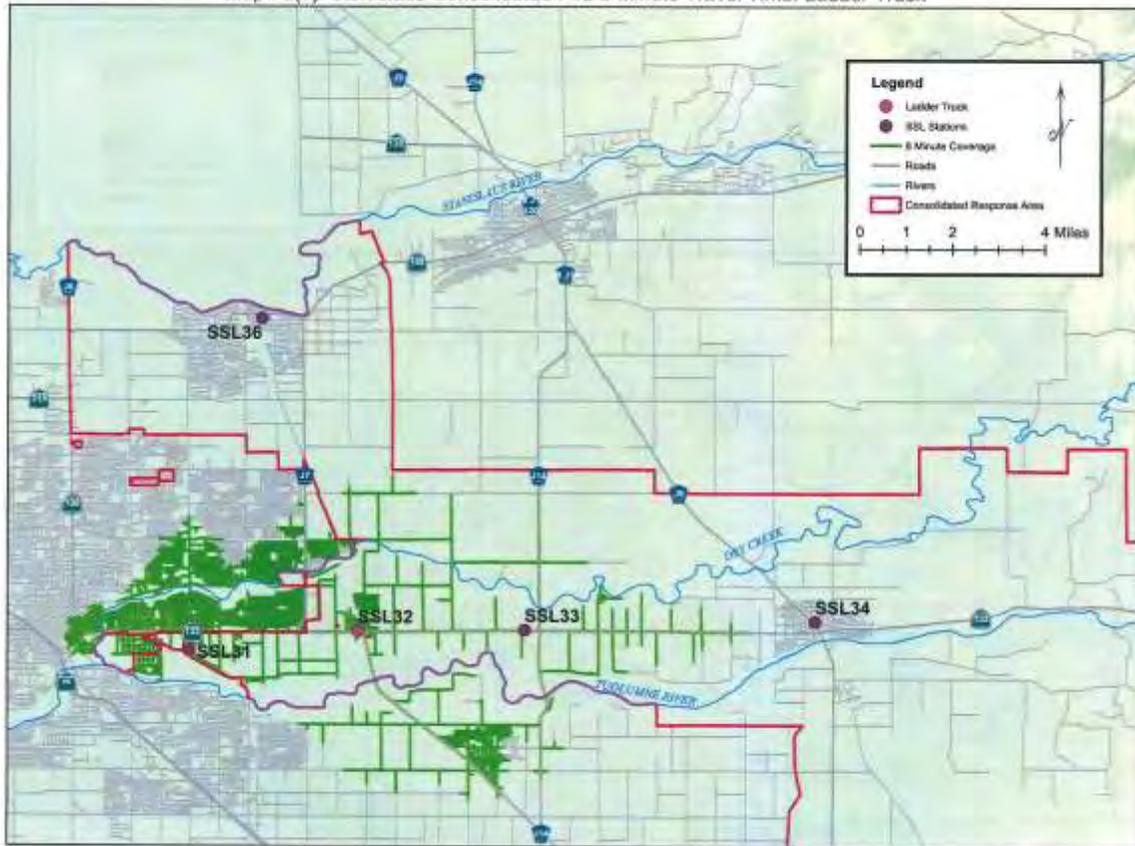
Map 6c. Stanislaus Consolidated Fire 8-Minute Coverage: 3 Engines

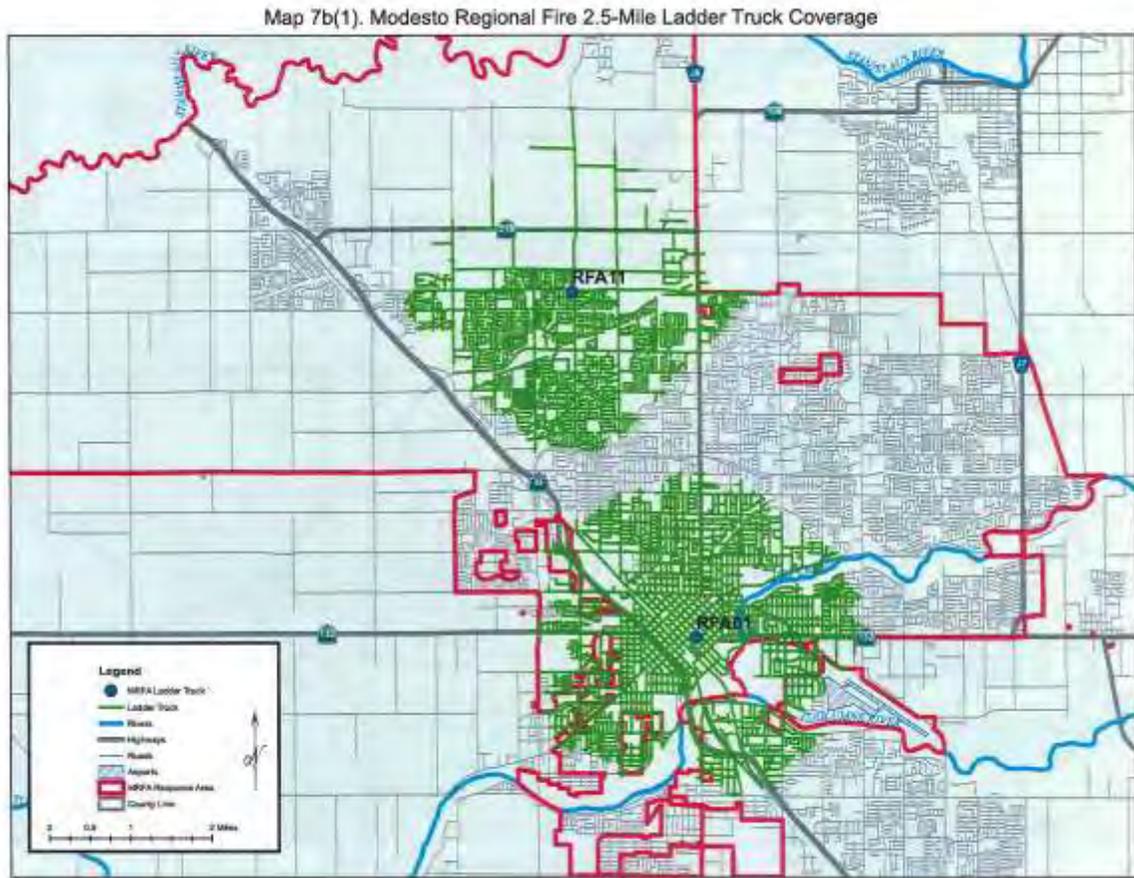




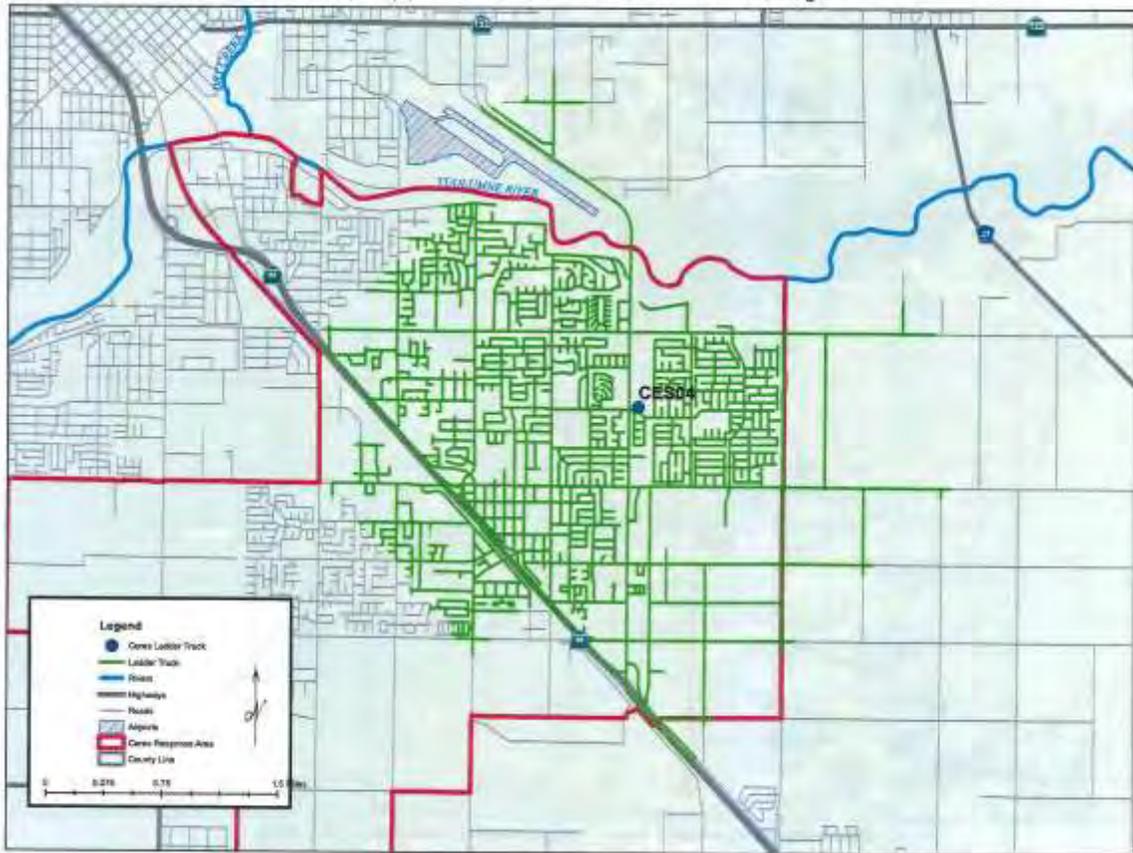


Map 7a(3). Stanislaus Consolidated Fire 8-Minute Travel Time: Ladder Truck

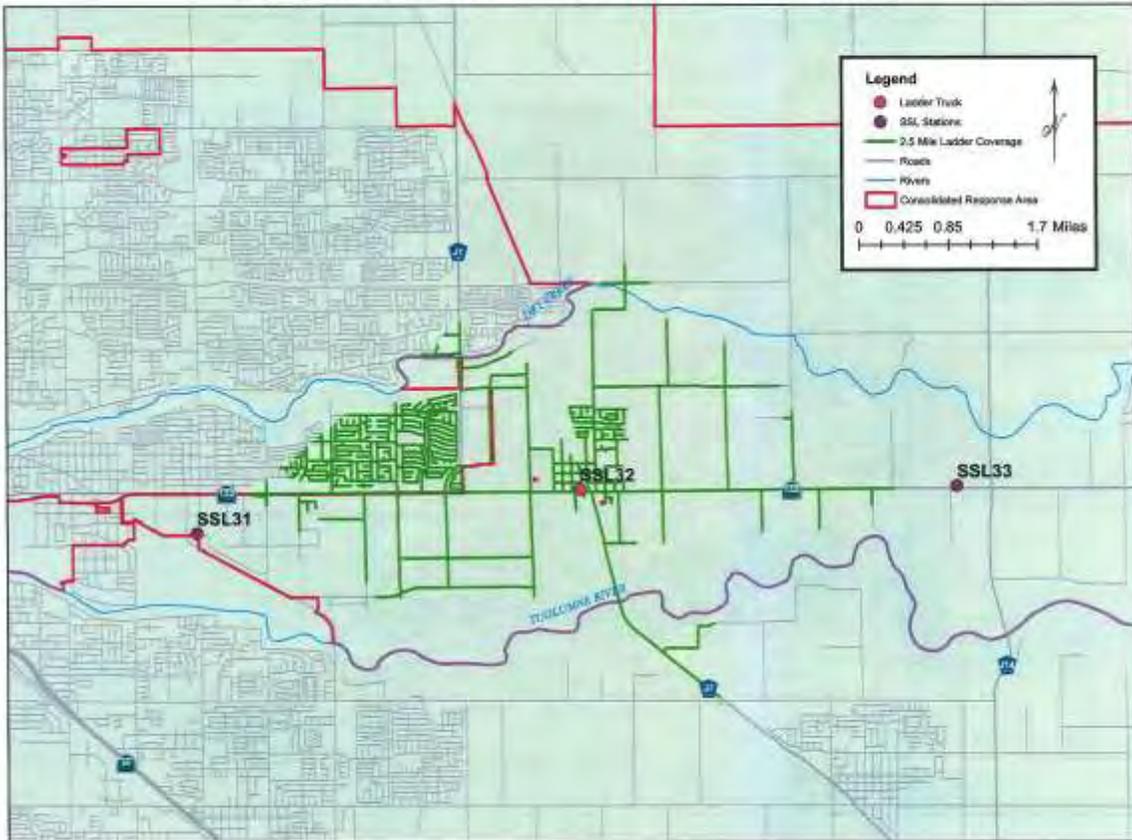


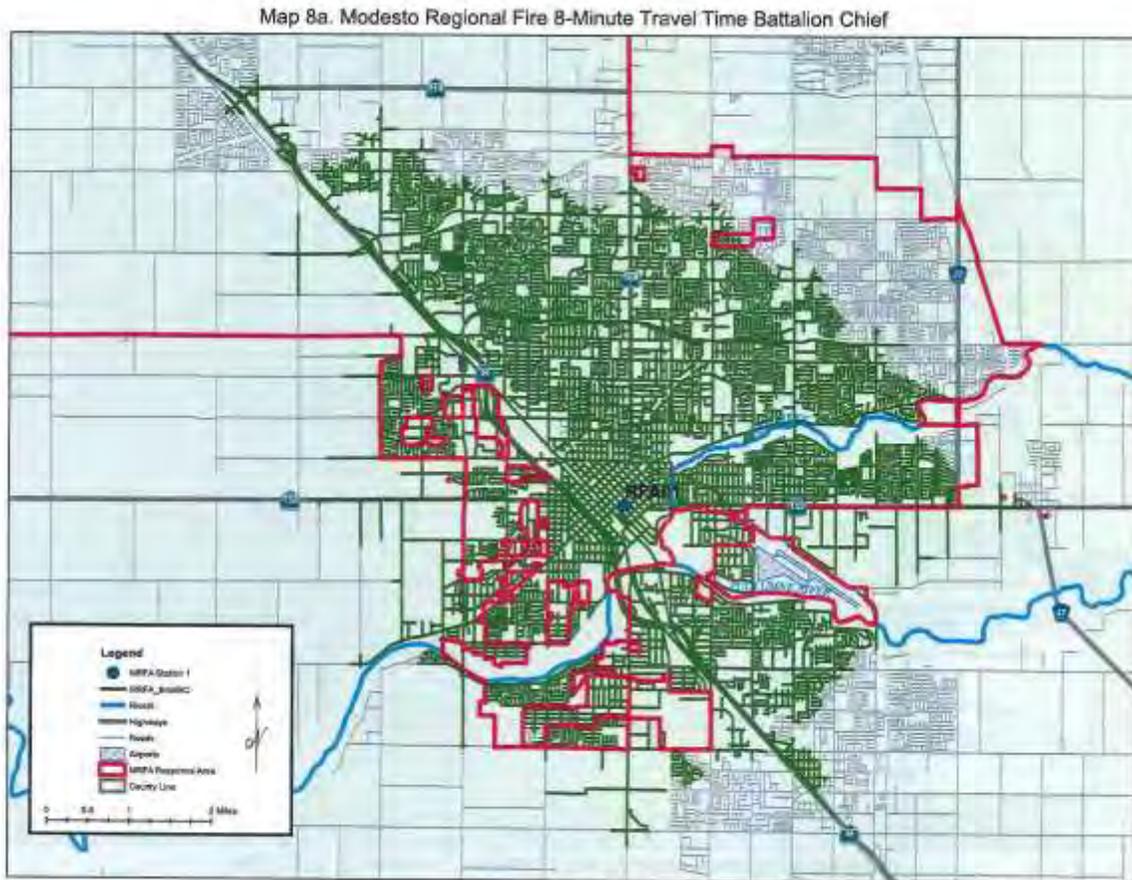


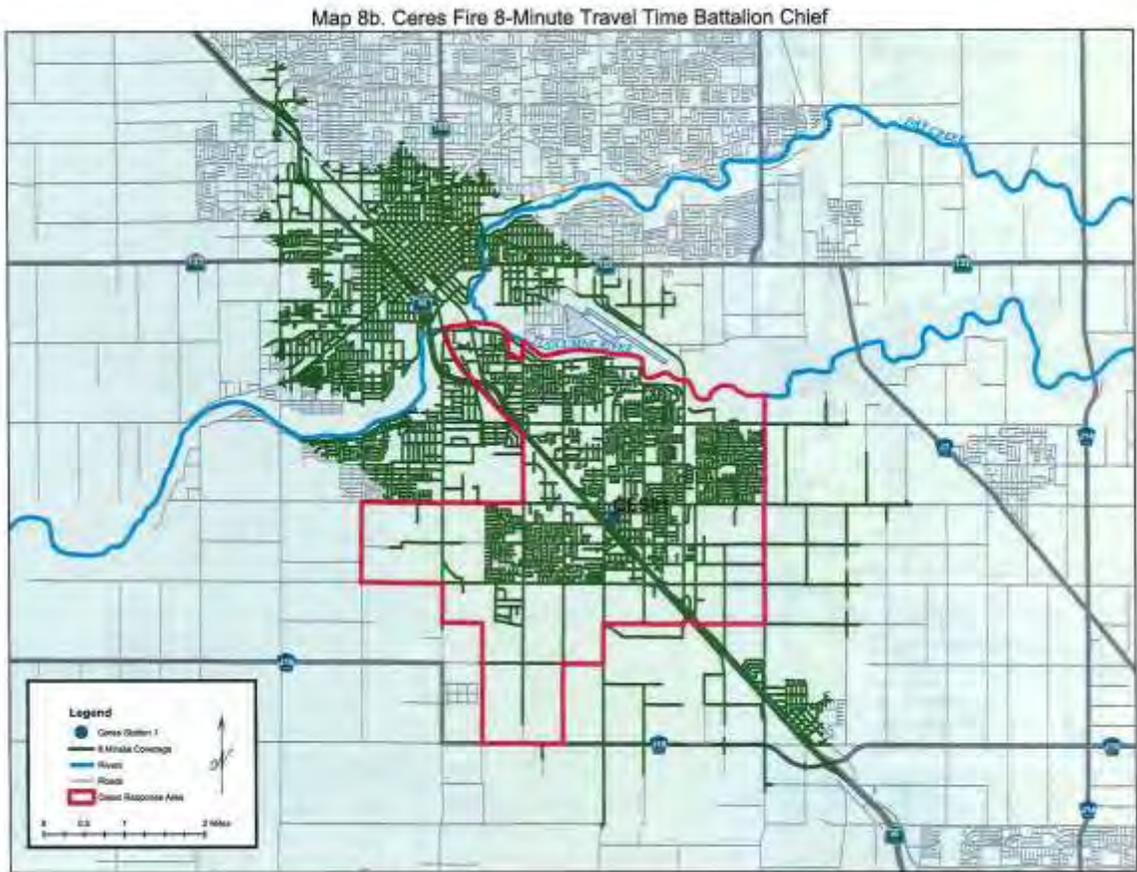
Map 7b(2). Ceres Fire 2.5-Mile Ladder Truck Coverage



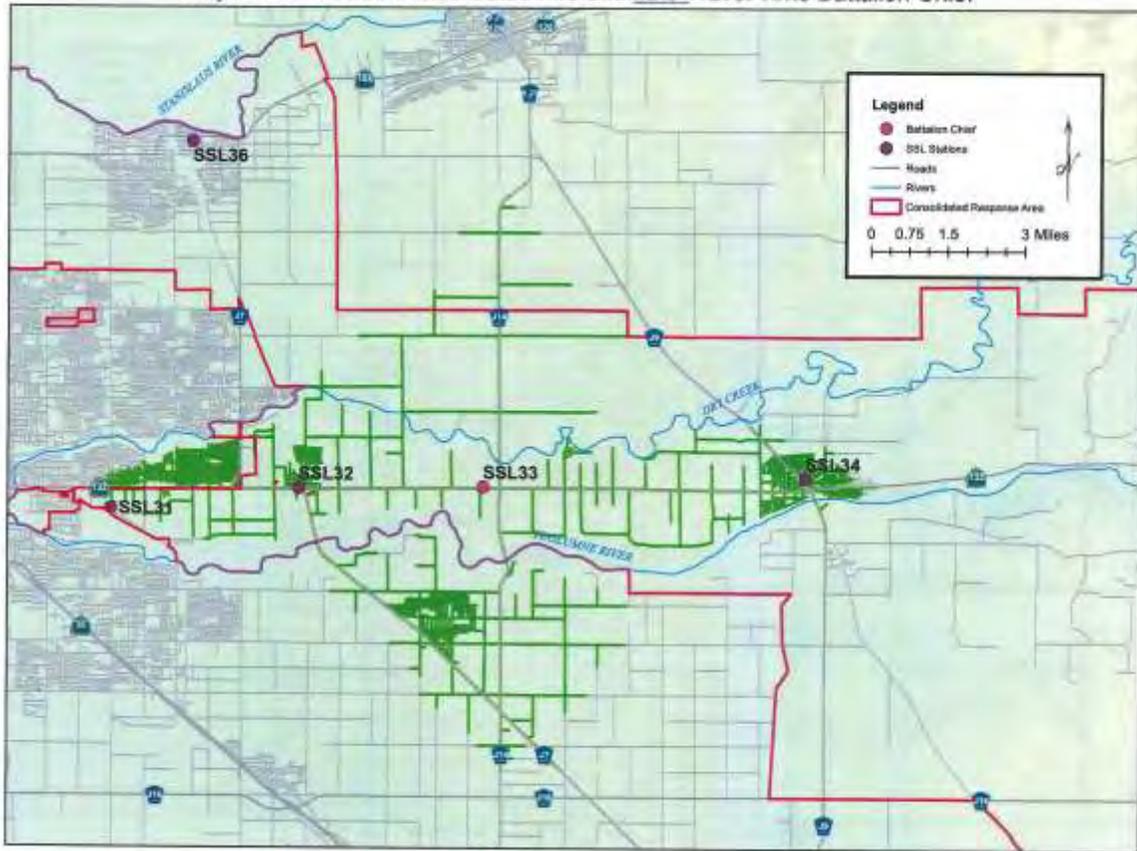
Map 7b(3). Stanislaus Consolidated Fire 2.5-Mile Ladder Truck Coverage

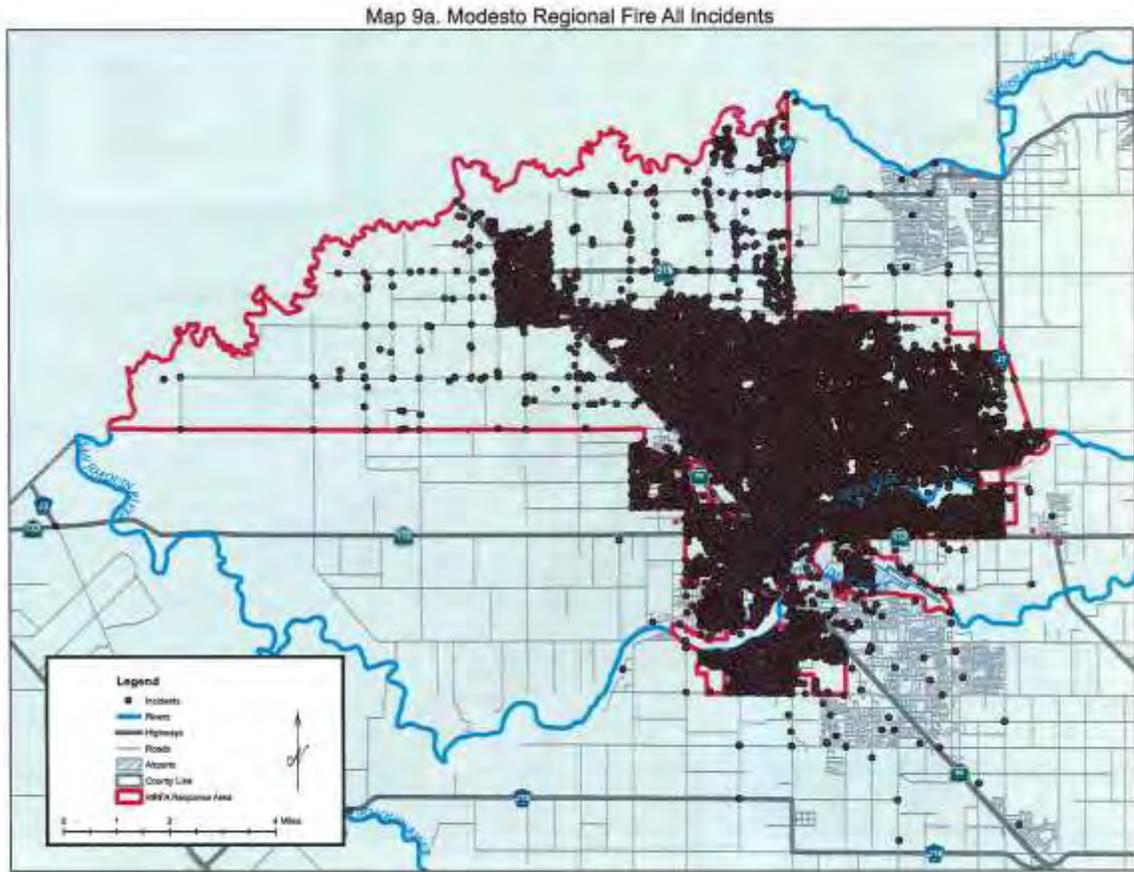


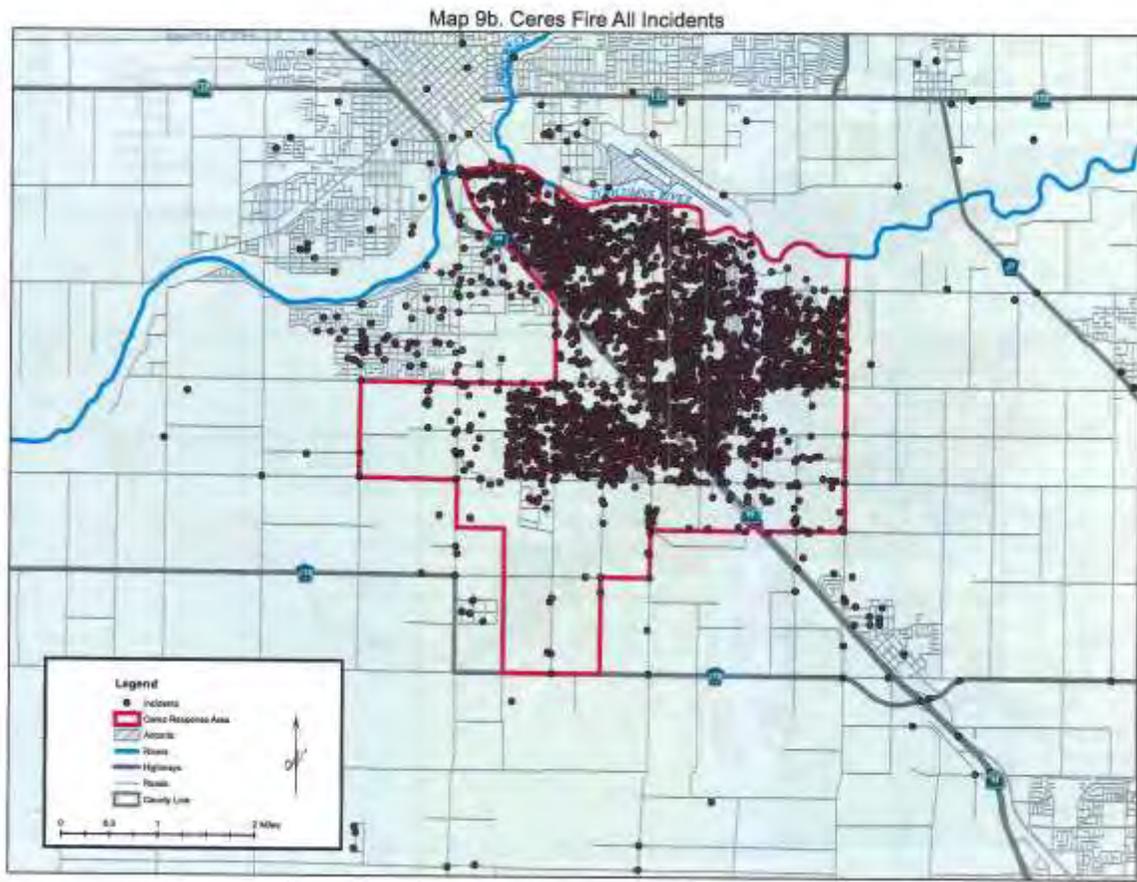


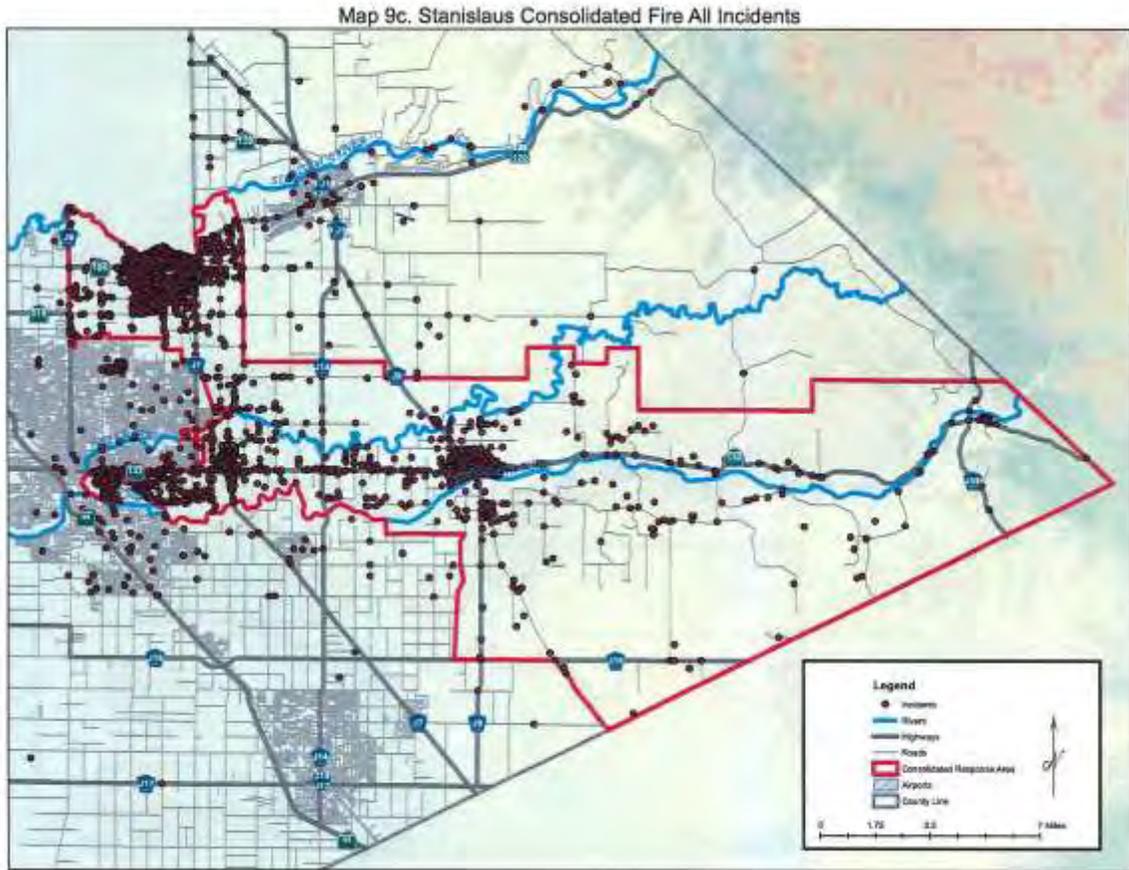


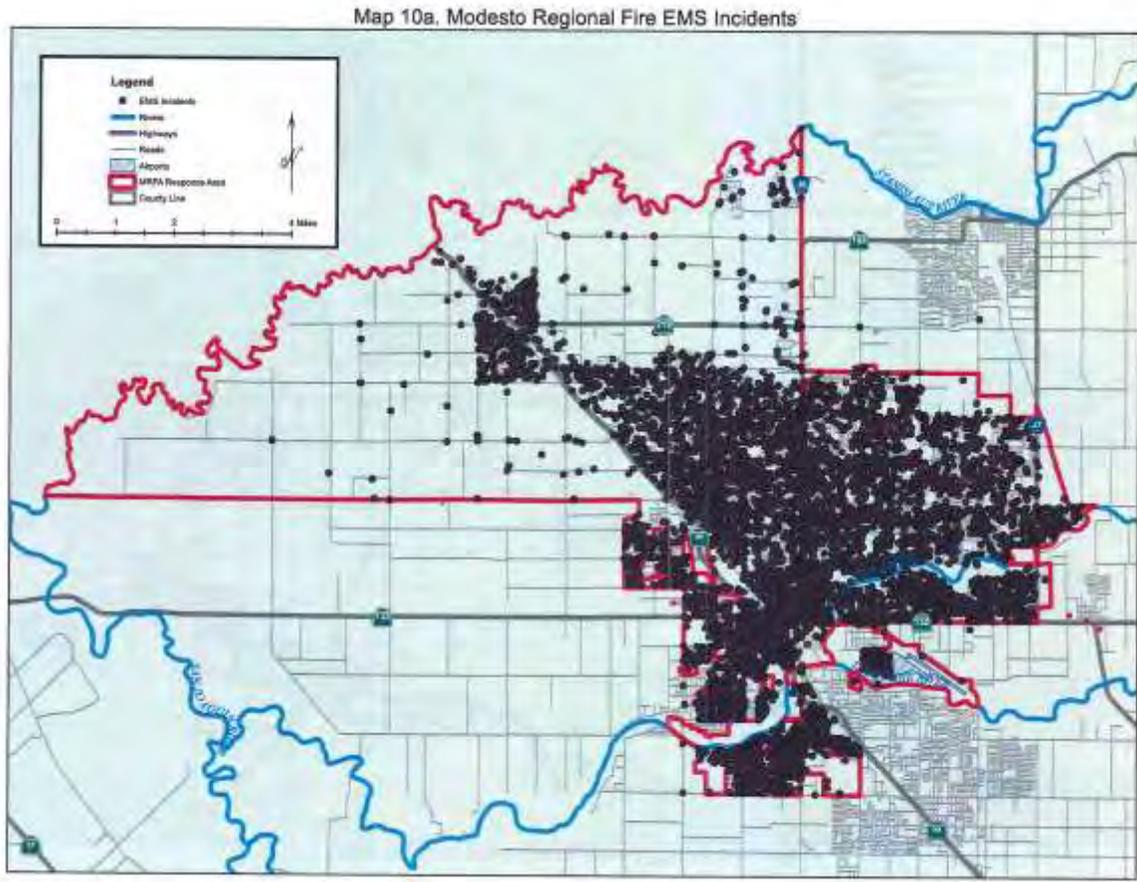
Map 8c. Stanislaus Consolidated Fire 8-Minute Travel Time Battalion Chief

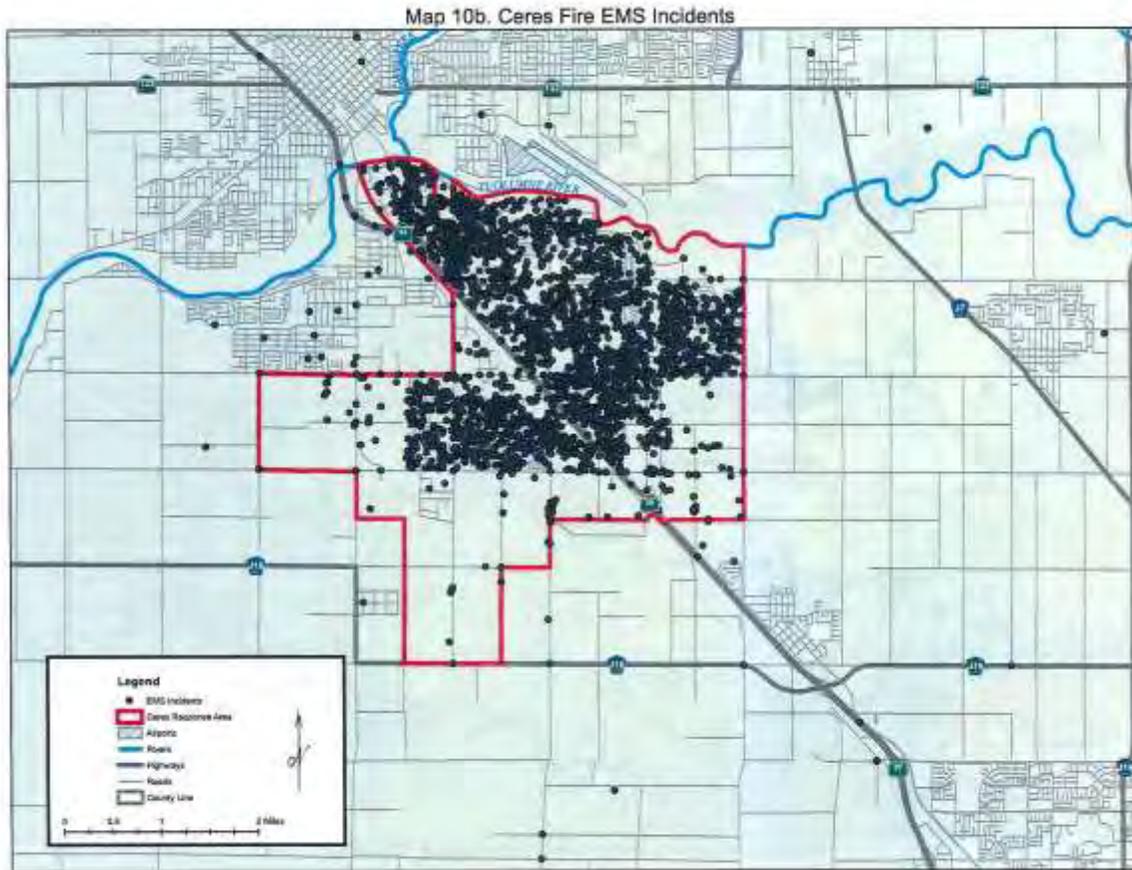


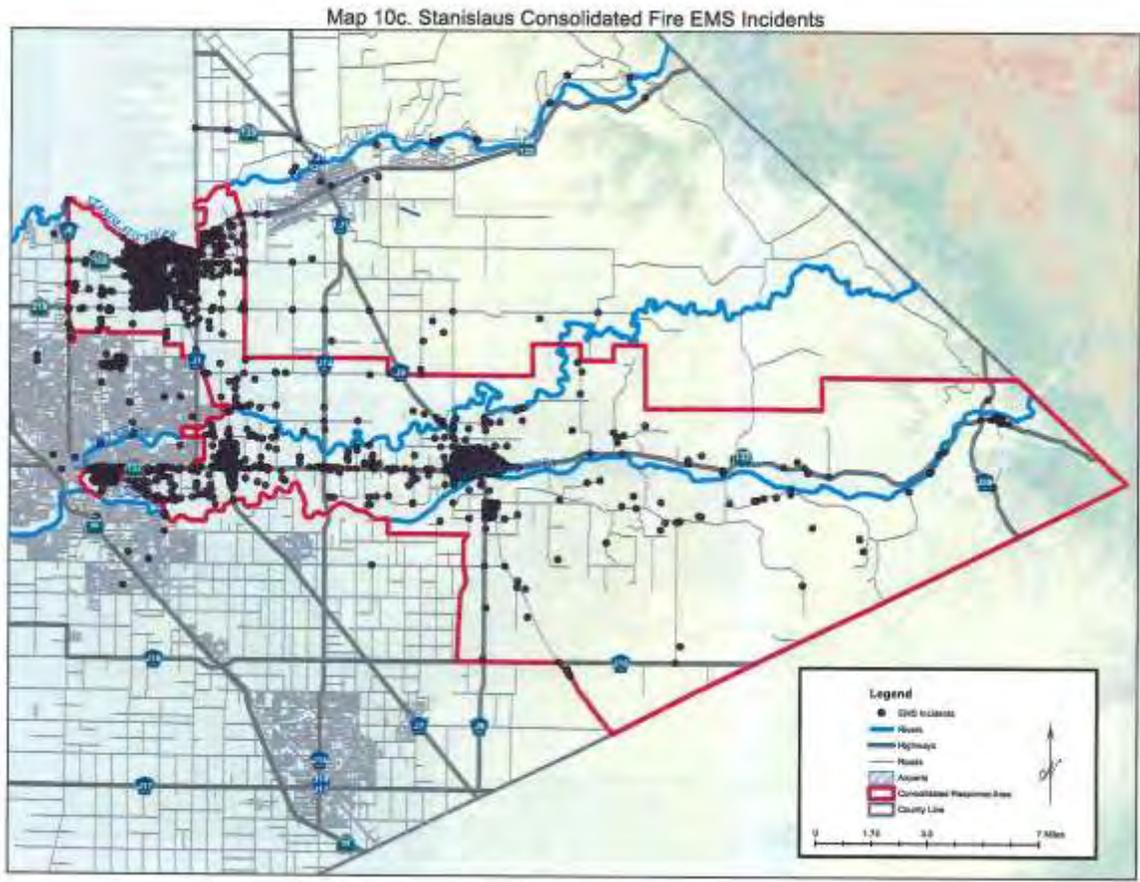




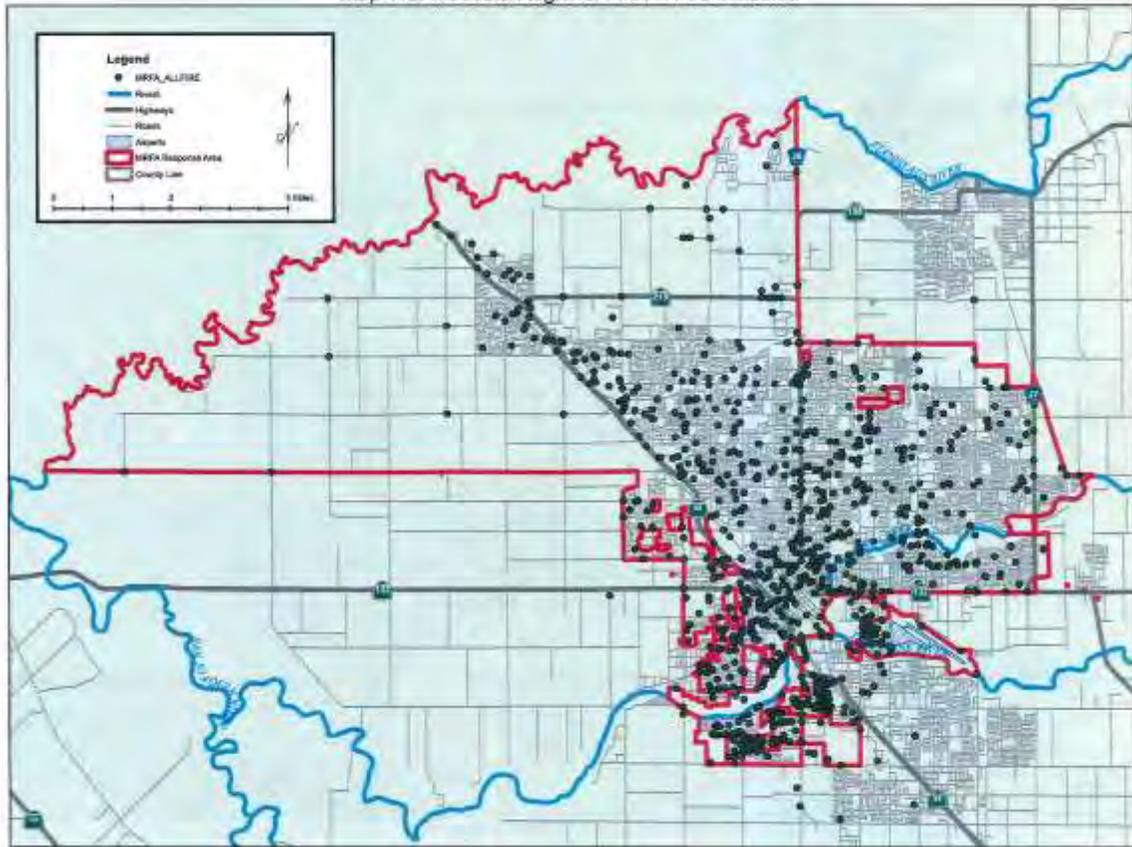


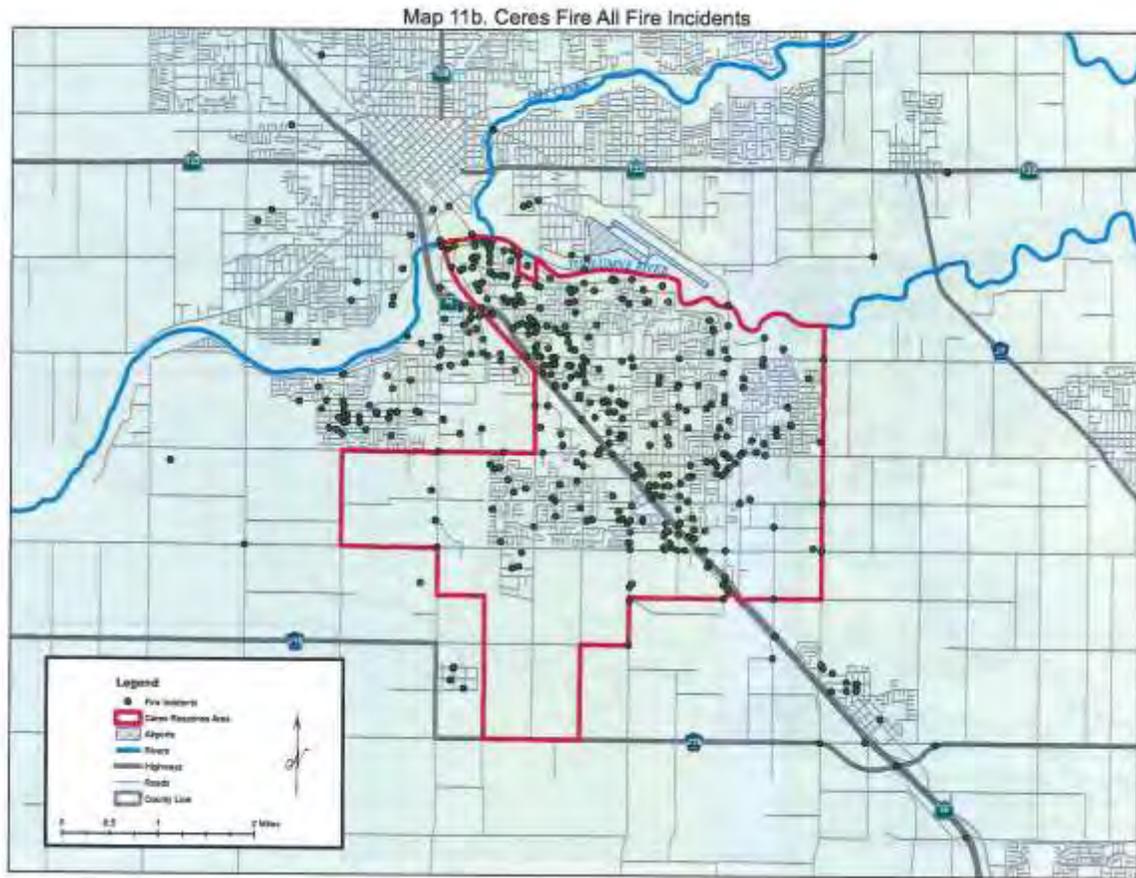


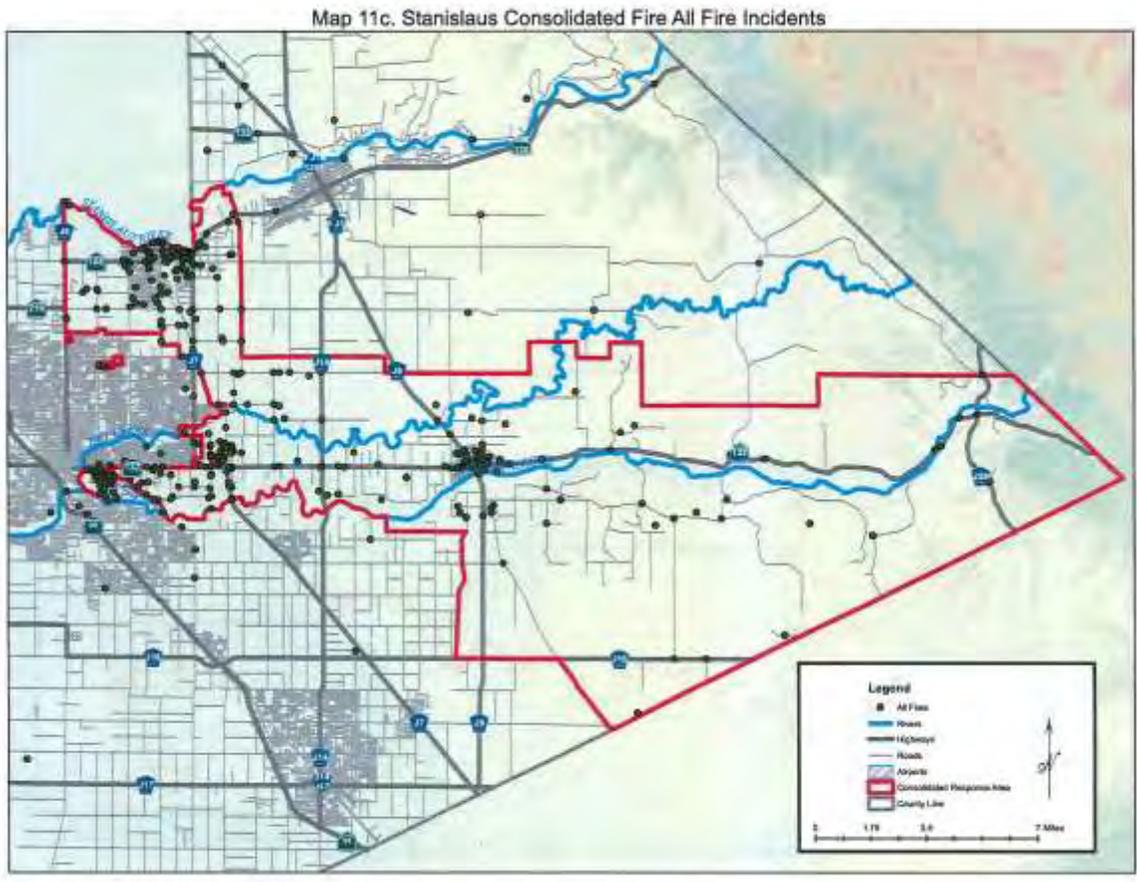




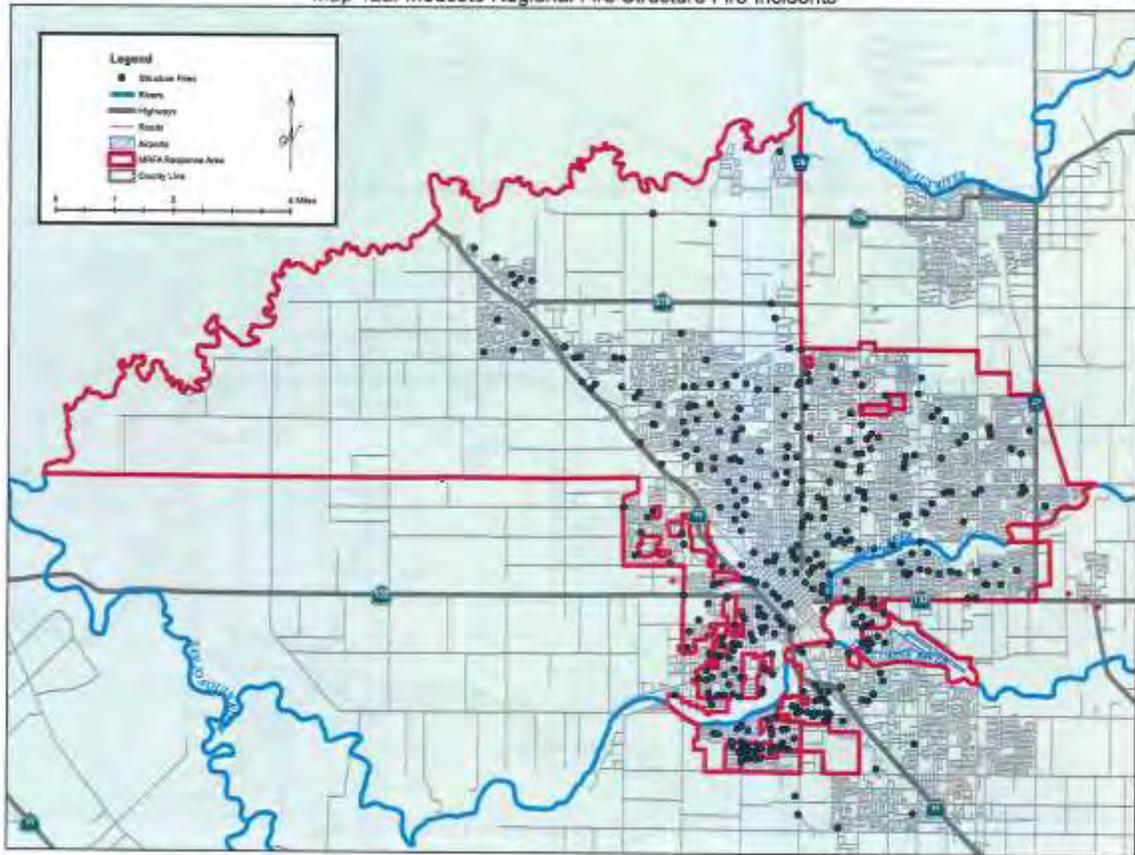
Map 11a. Modesto Regional Fire All Fire Incidents



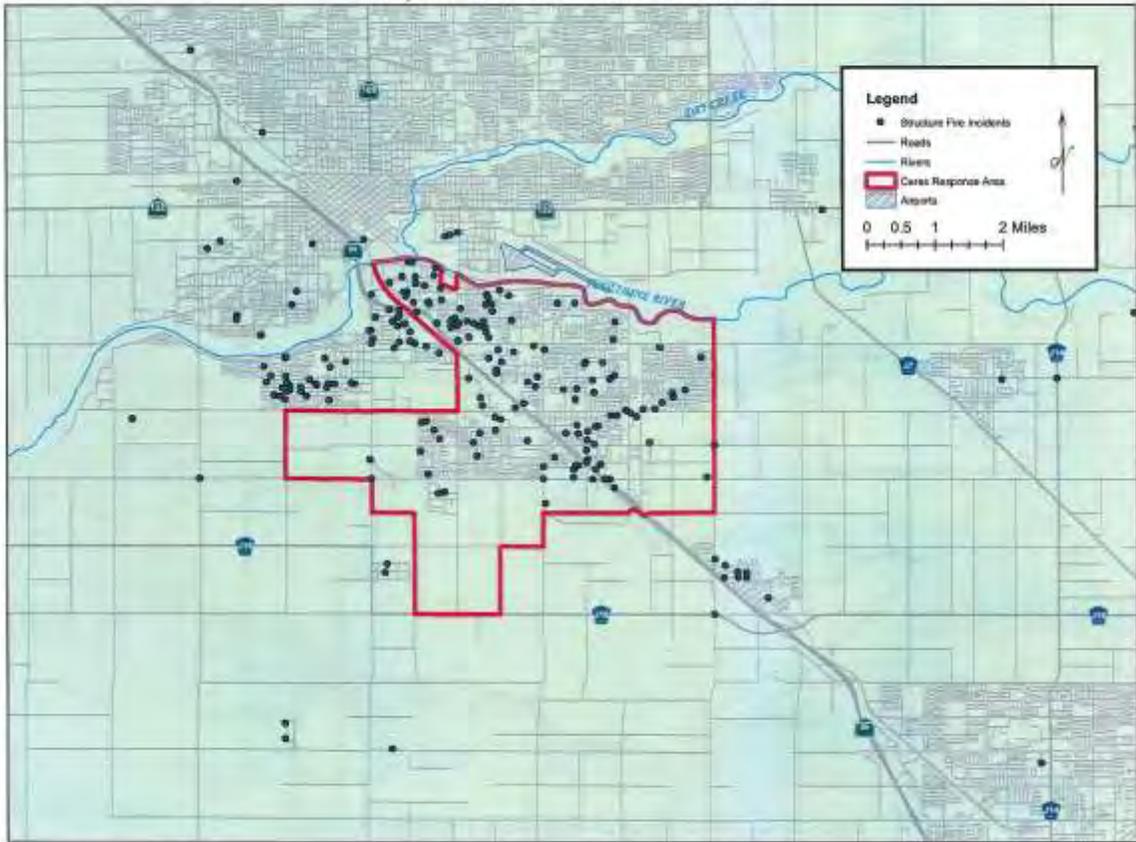




Map 12a. Modesto Regional Fire Structure Fire Incidents

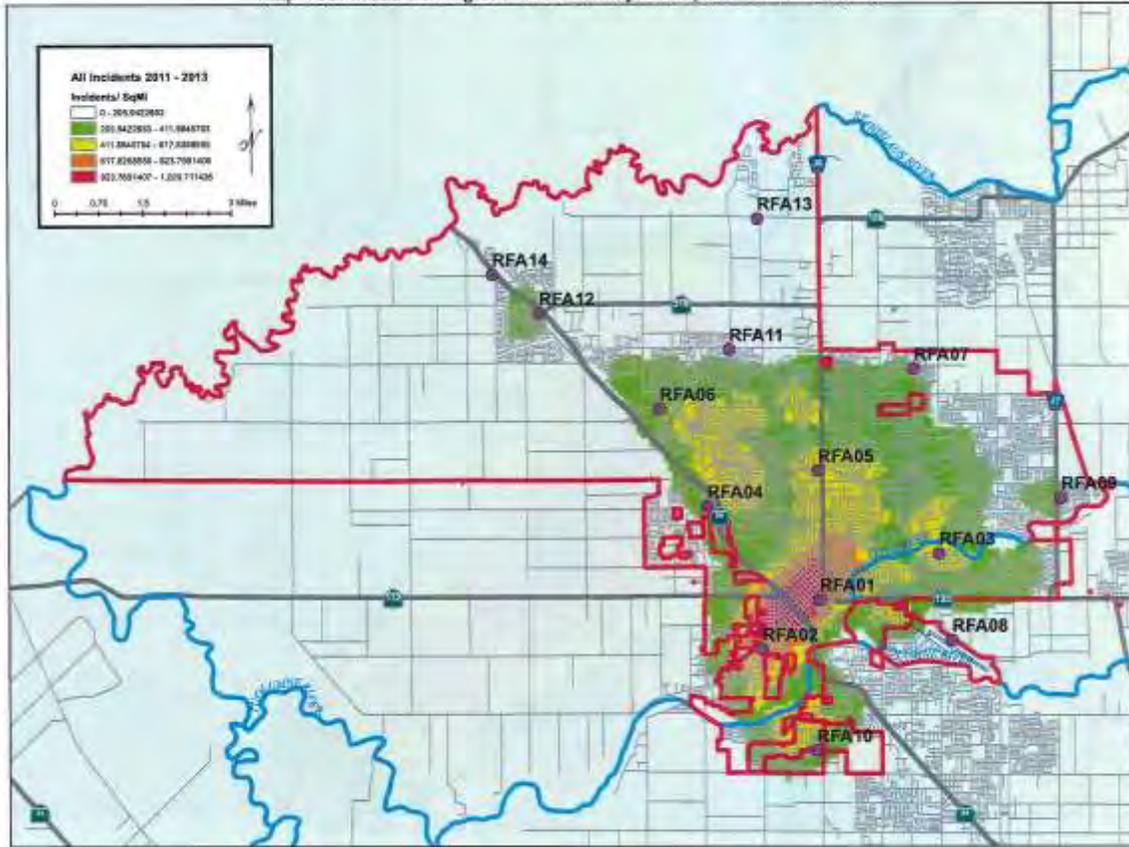


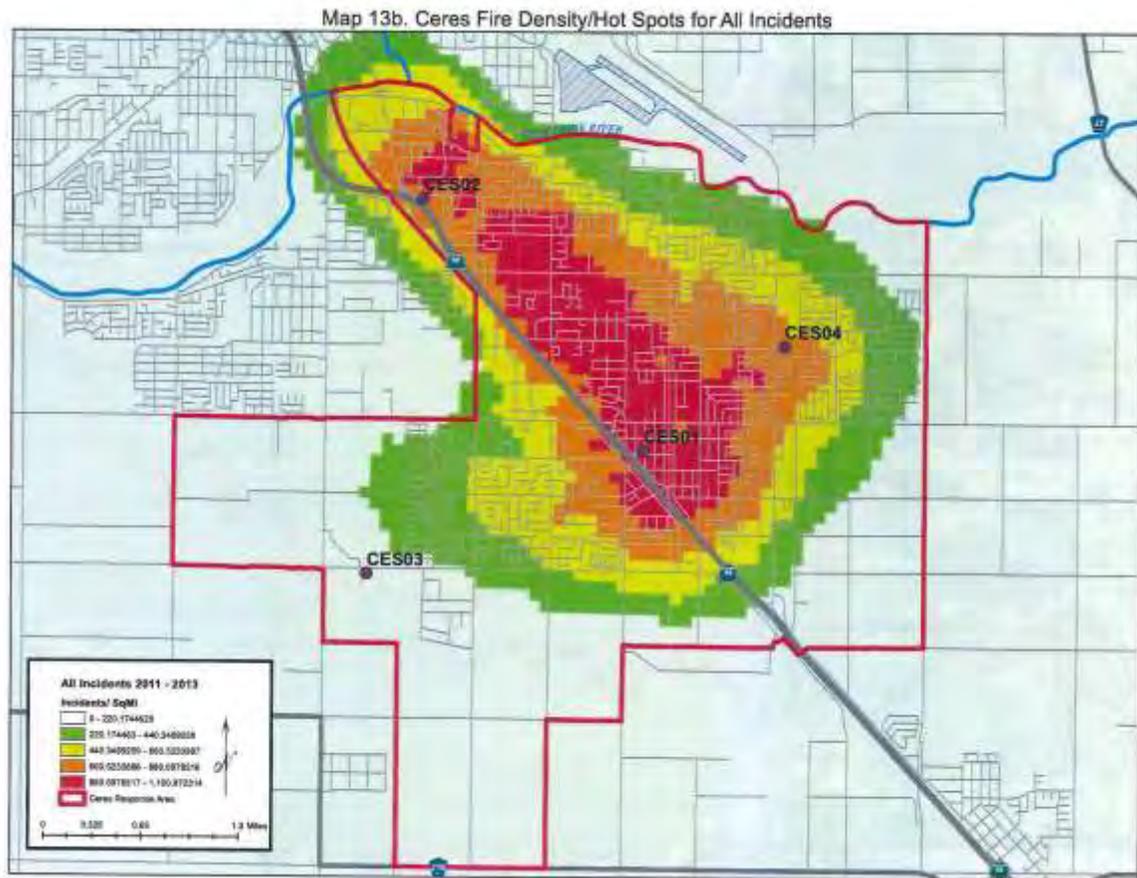
Map 12b. Ceres Fire Structure Fire Incidents



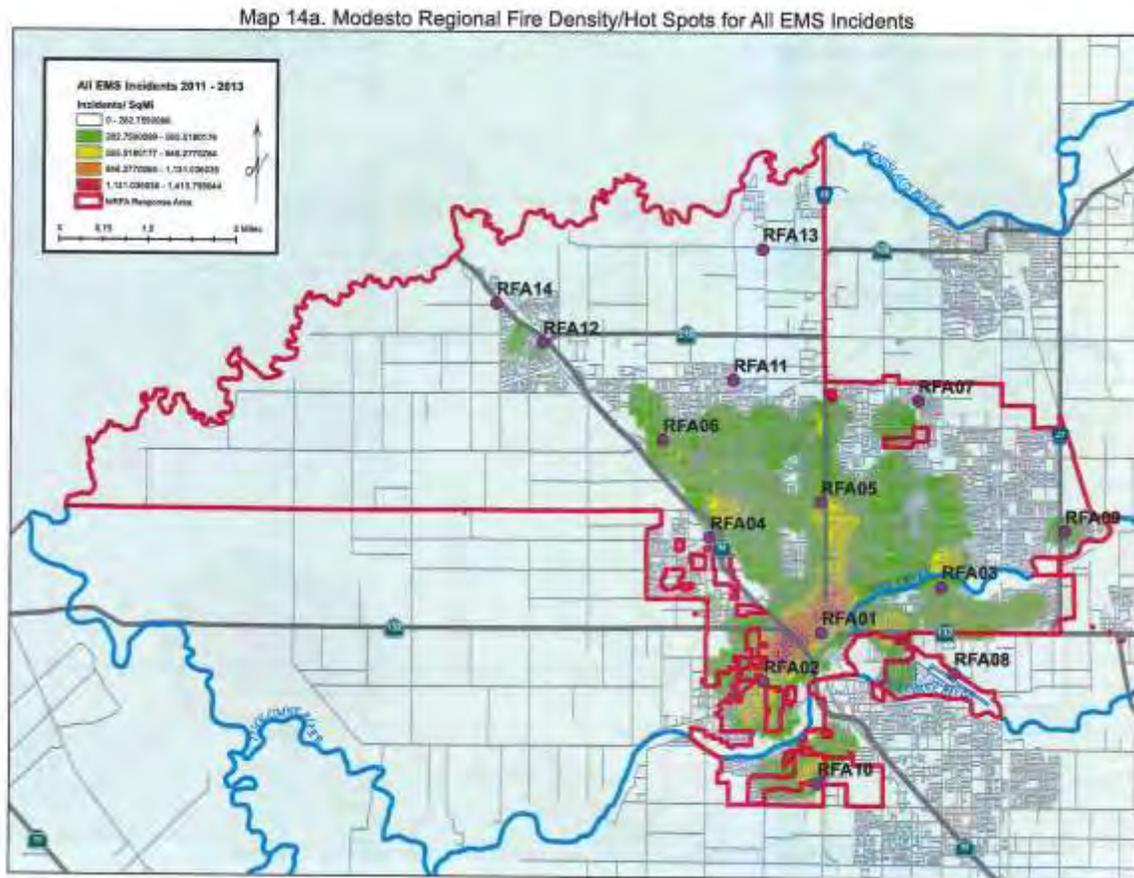


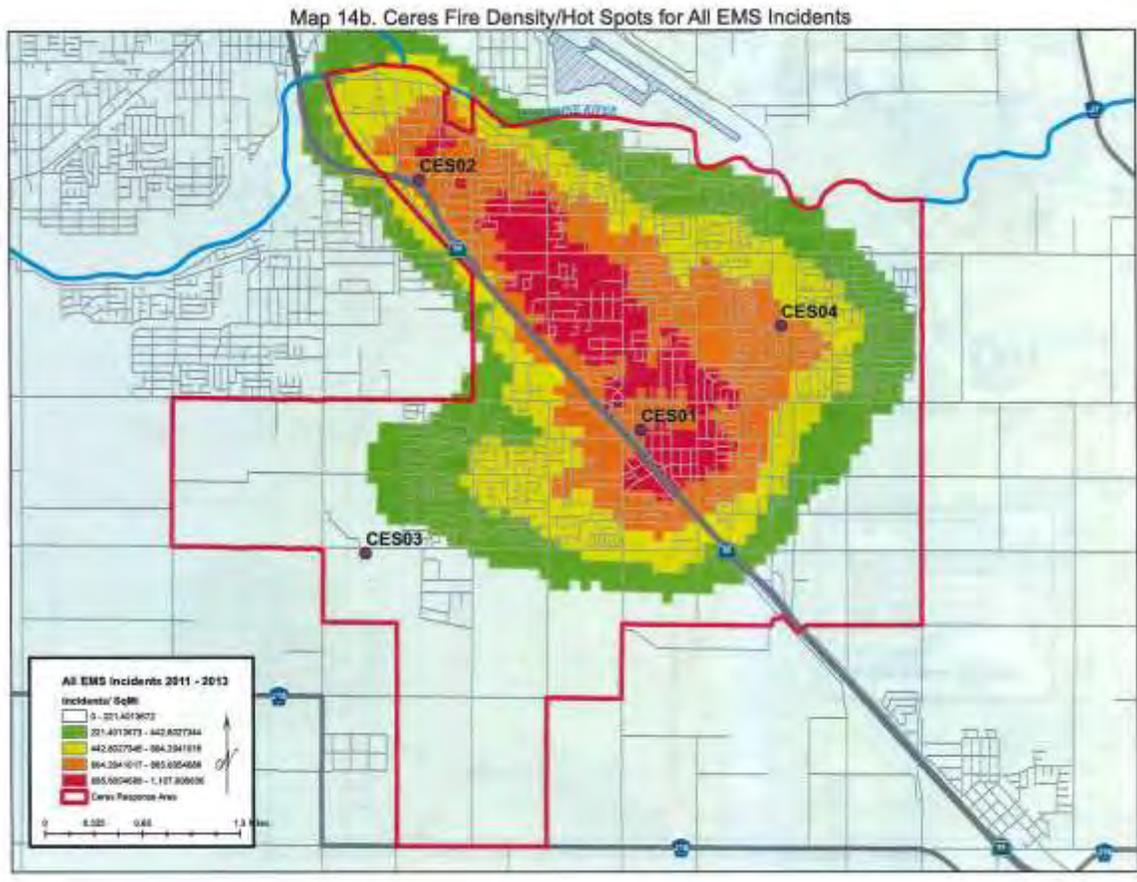
Map 13a. Modesto Regional Fire Density/Hot Spots for All Incidents

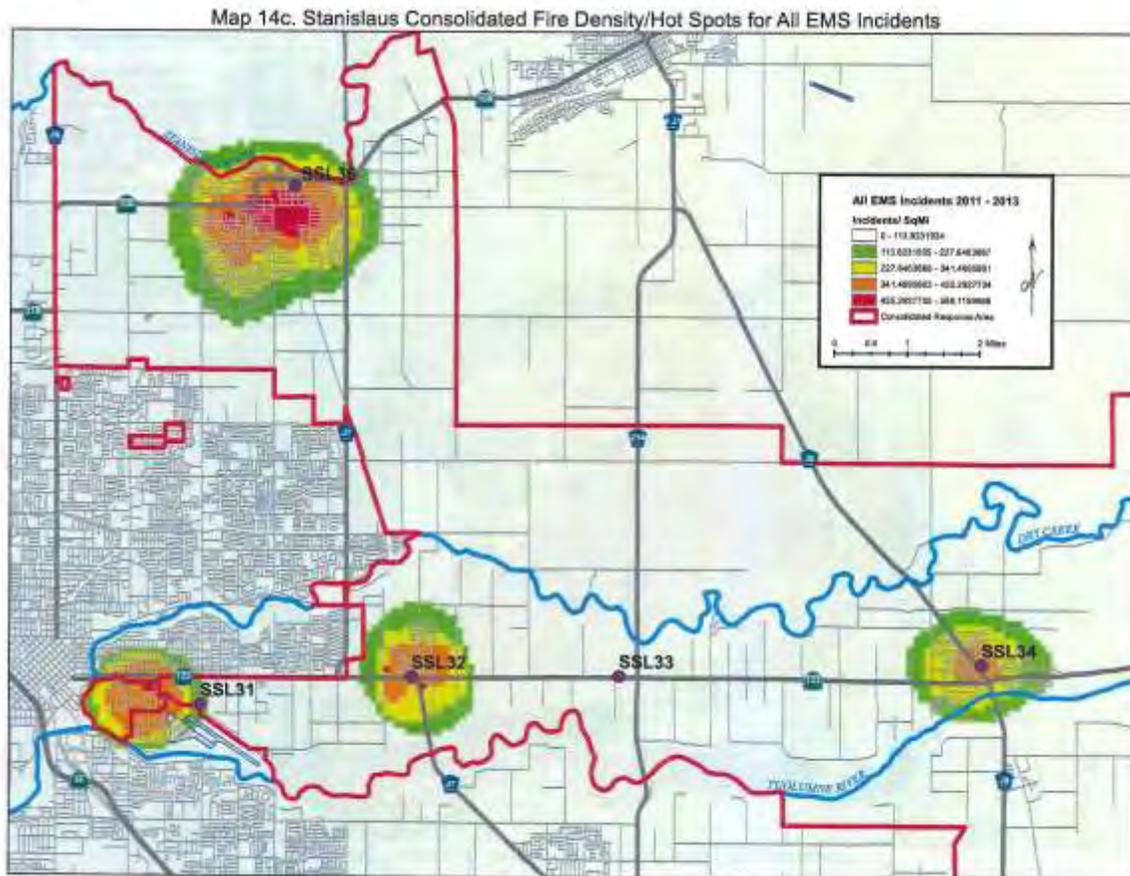




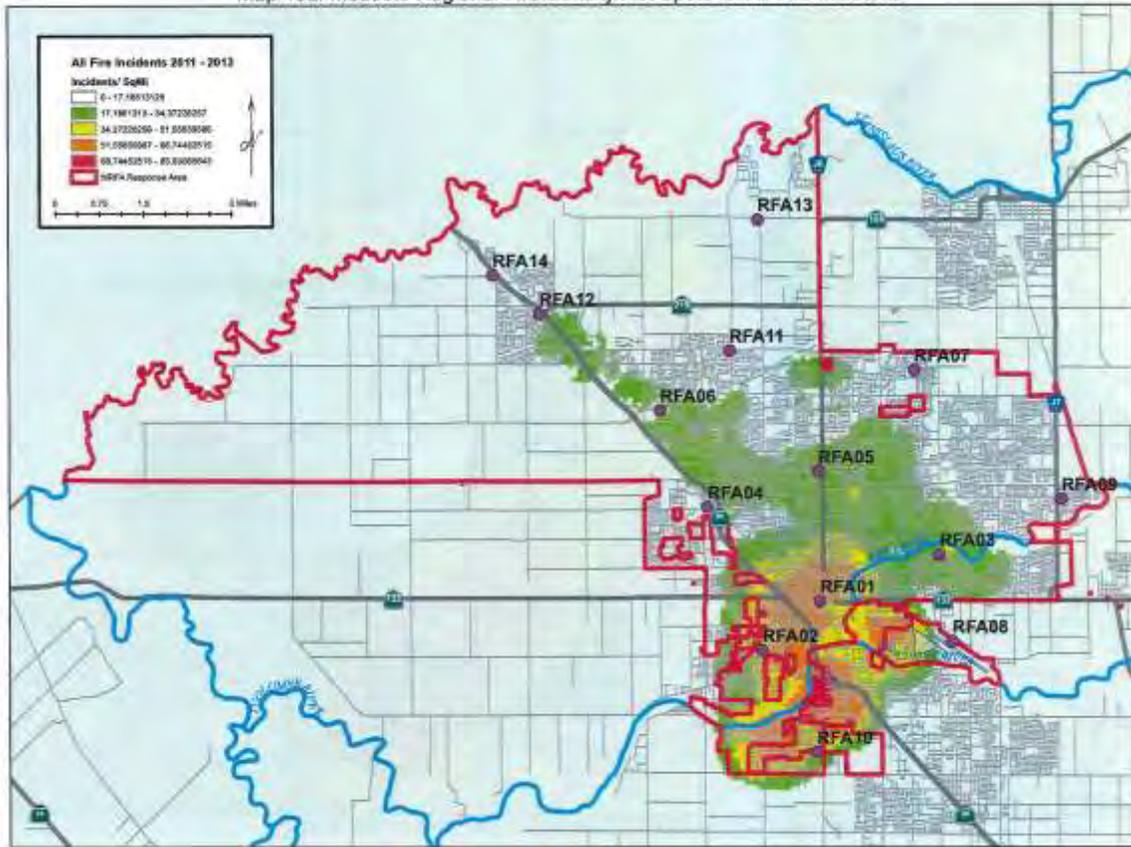


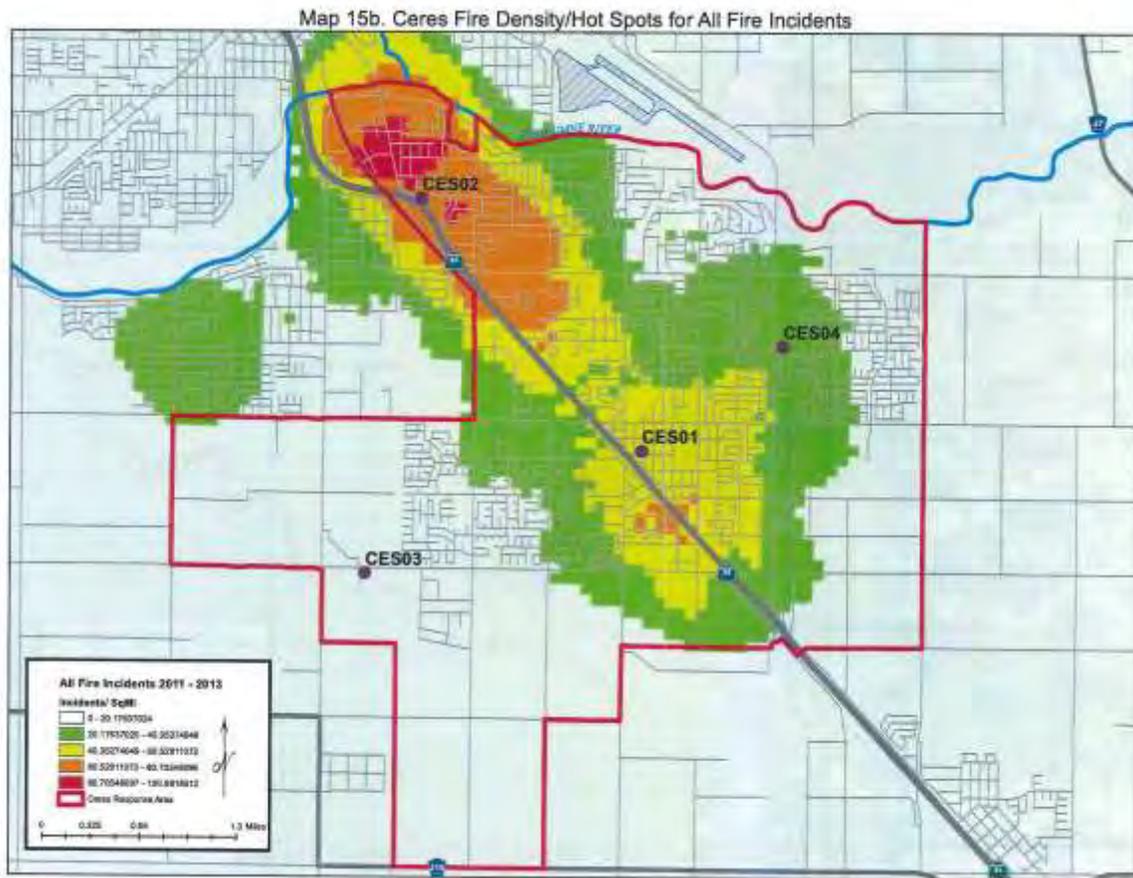


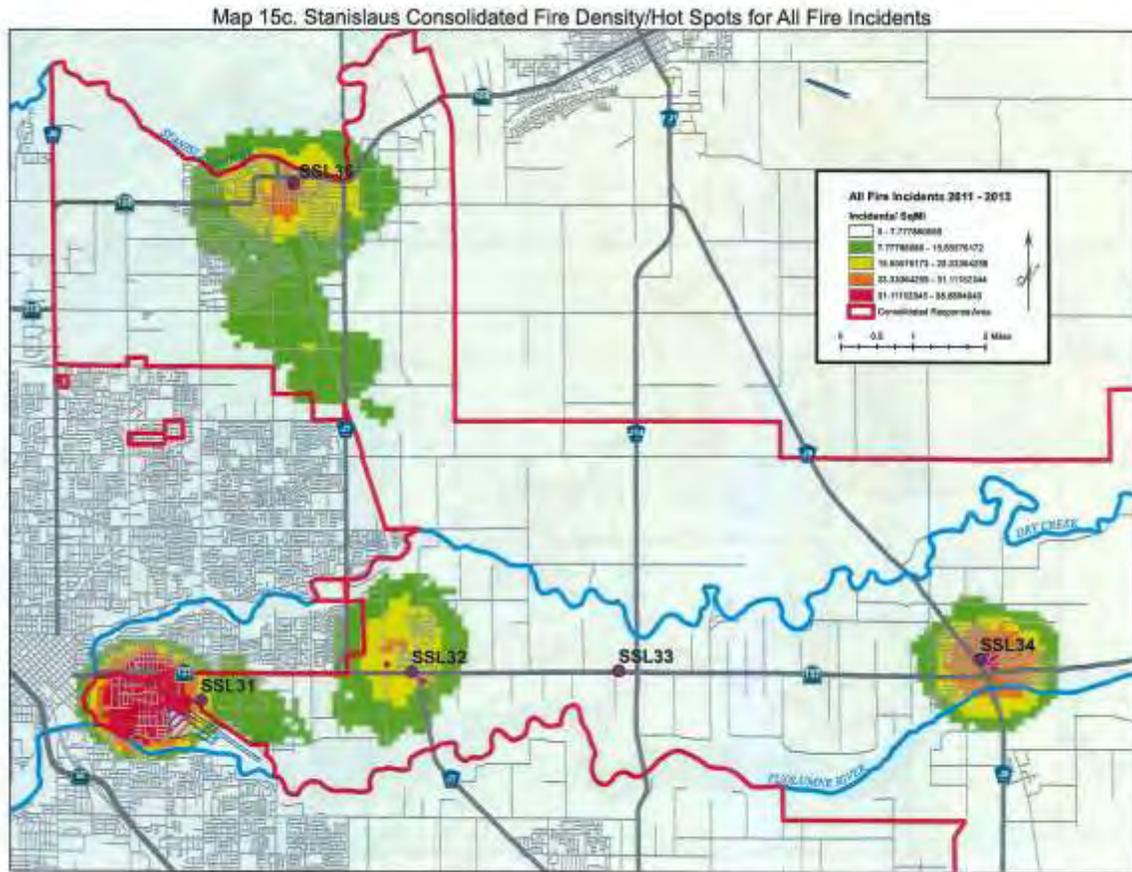




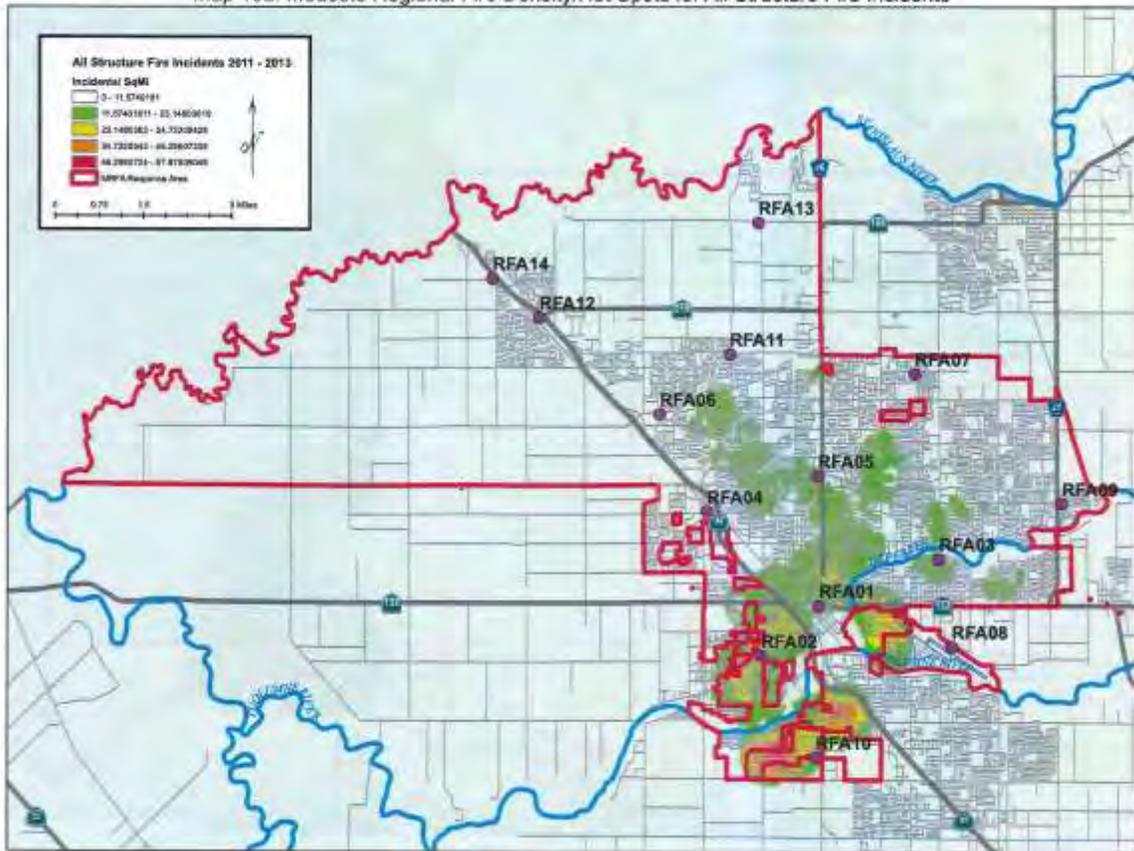
Map 15a. Modesto Regional Fire Density/Hot Spots for All Fire Incidents

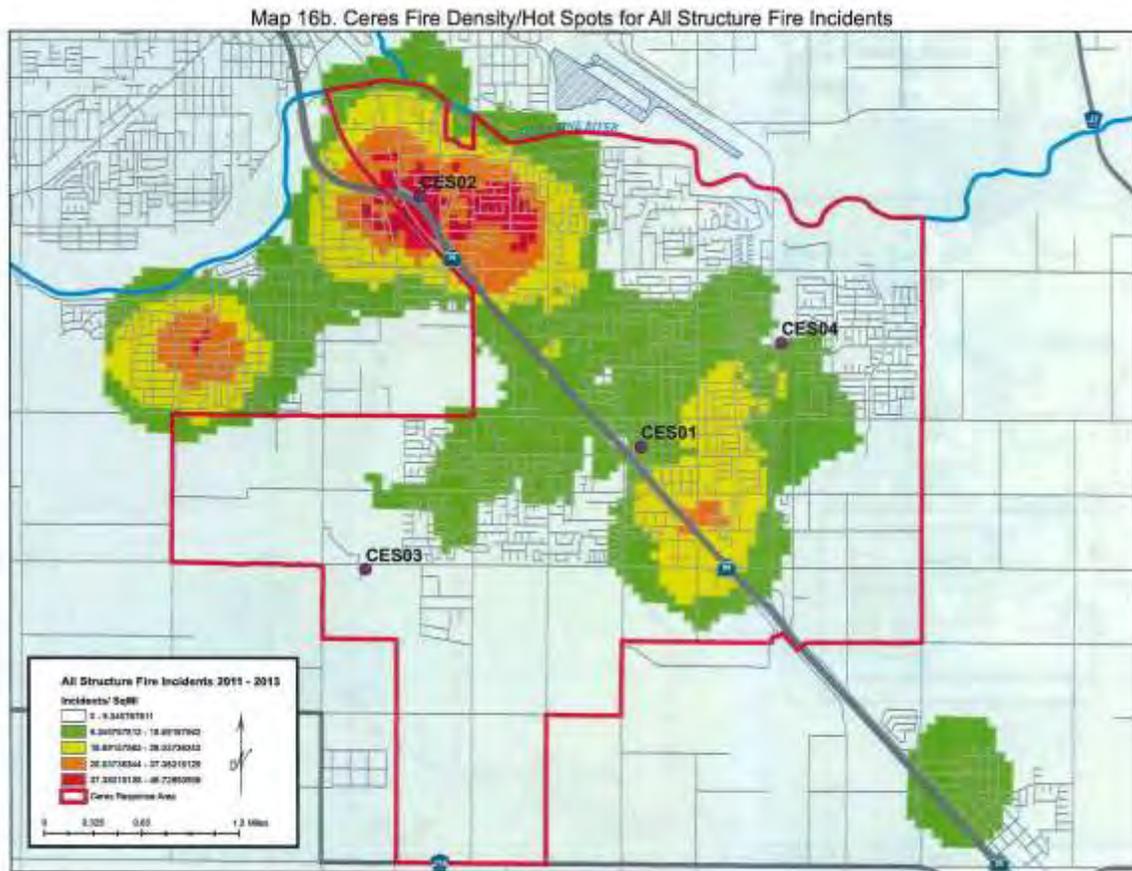


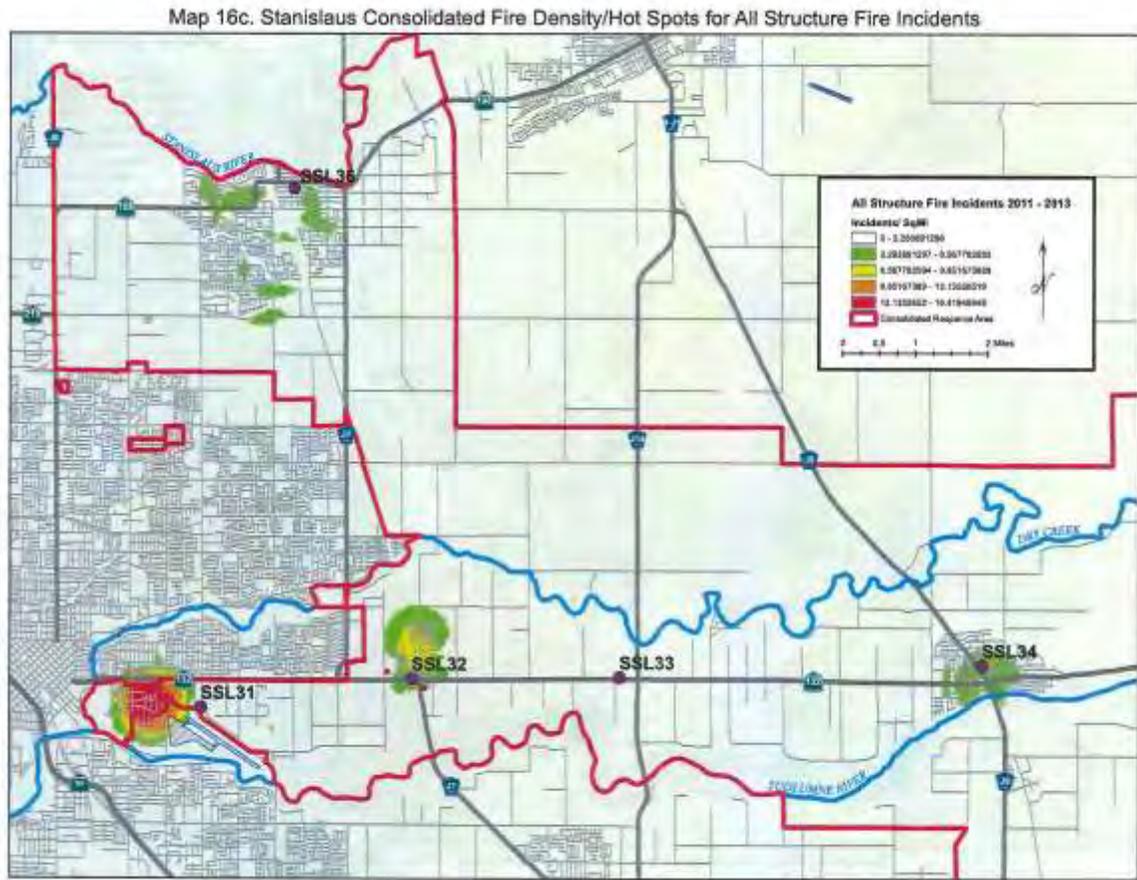




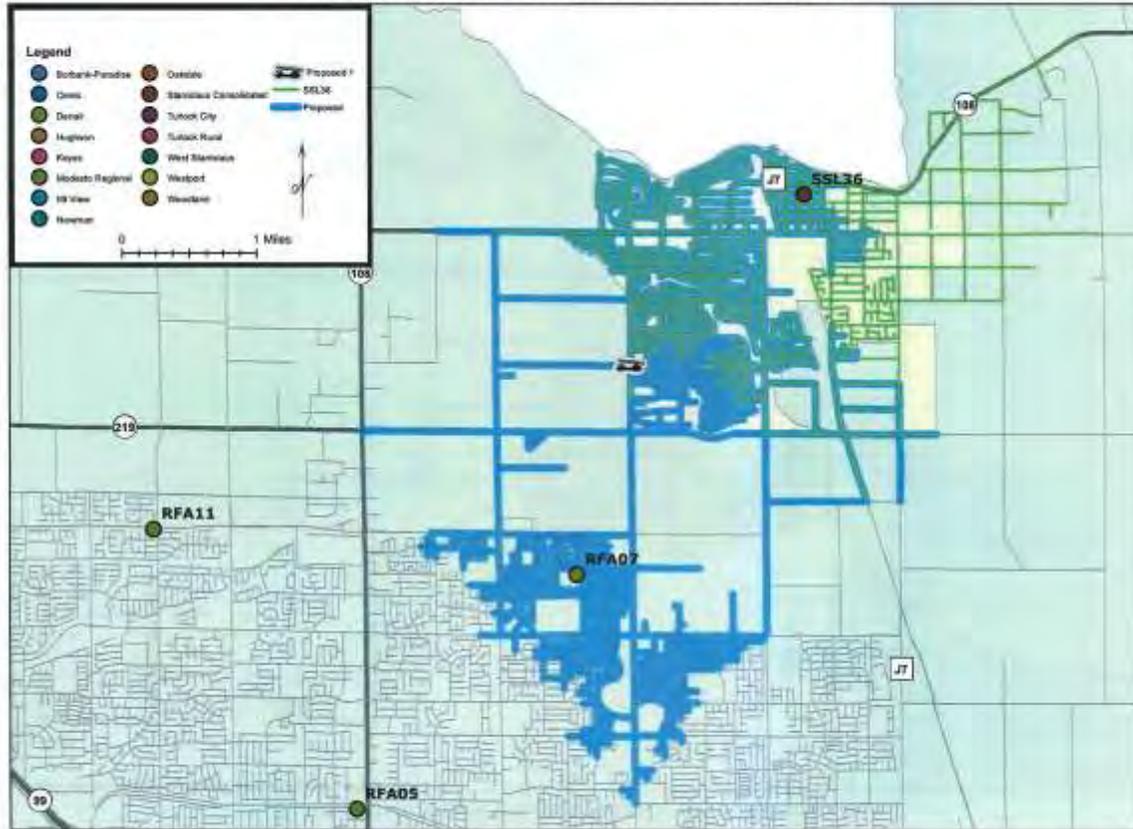
Map 16a. Modesto Regional Fire Density/Hot Spots for All Structure Fire Incidents



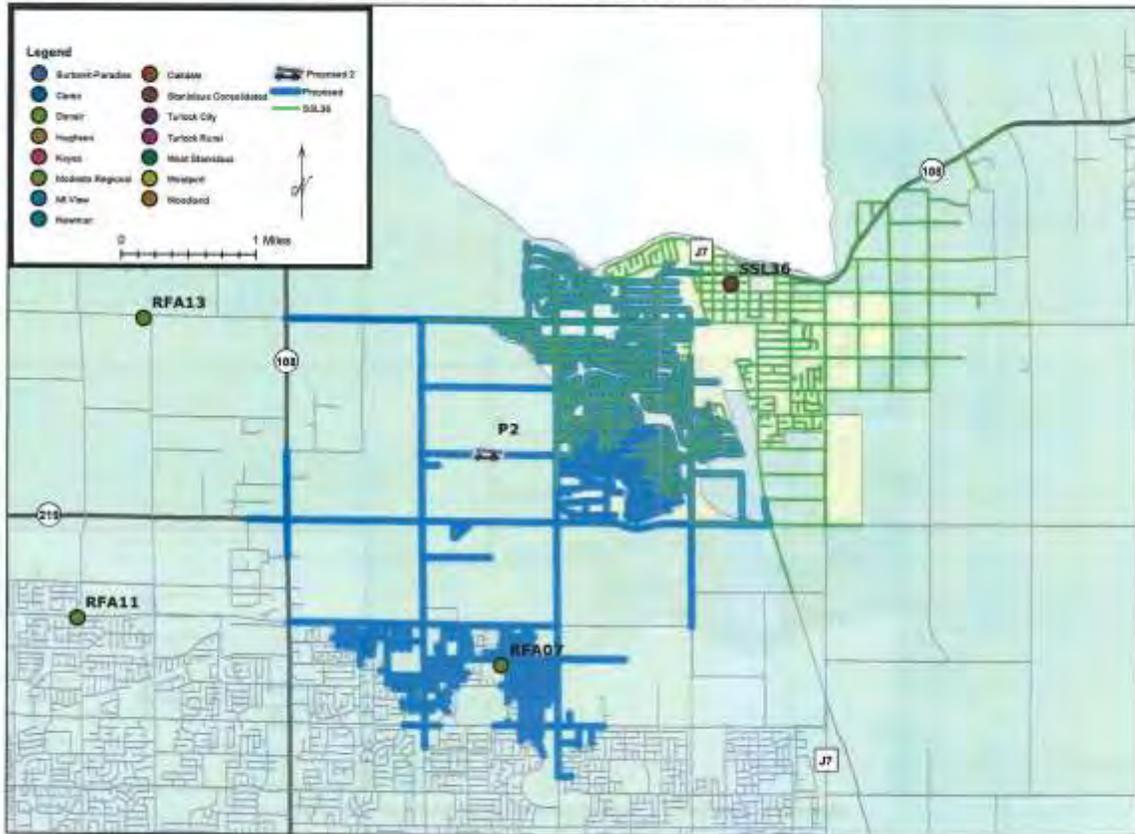




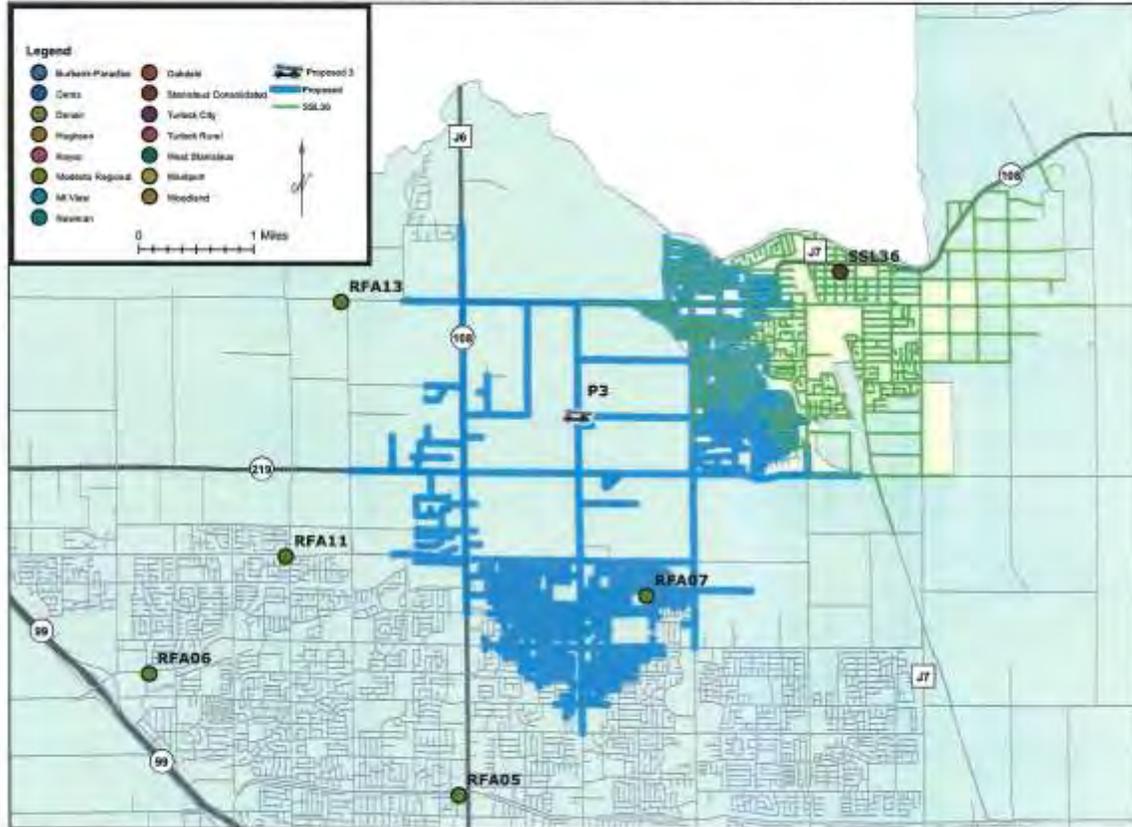
Map 17a. Riverbank Proposed Station 1: 5-Minute Response



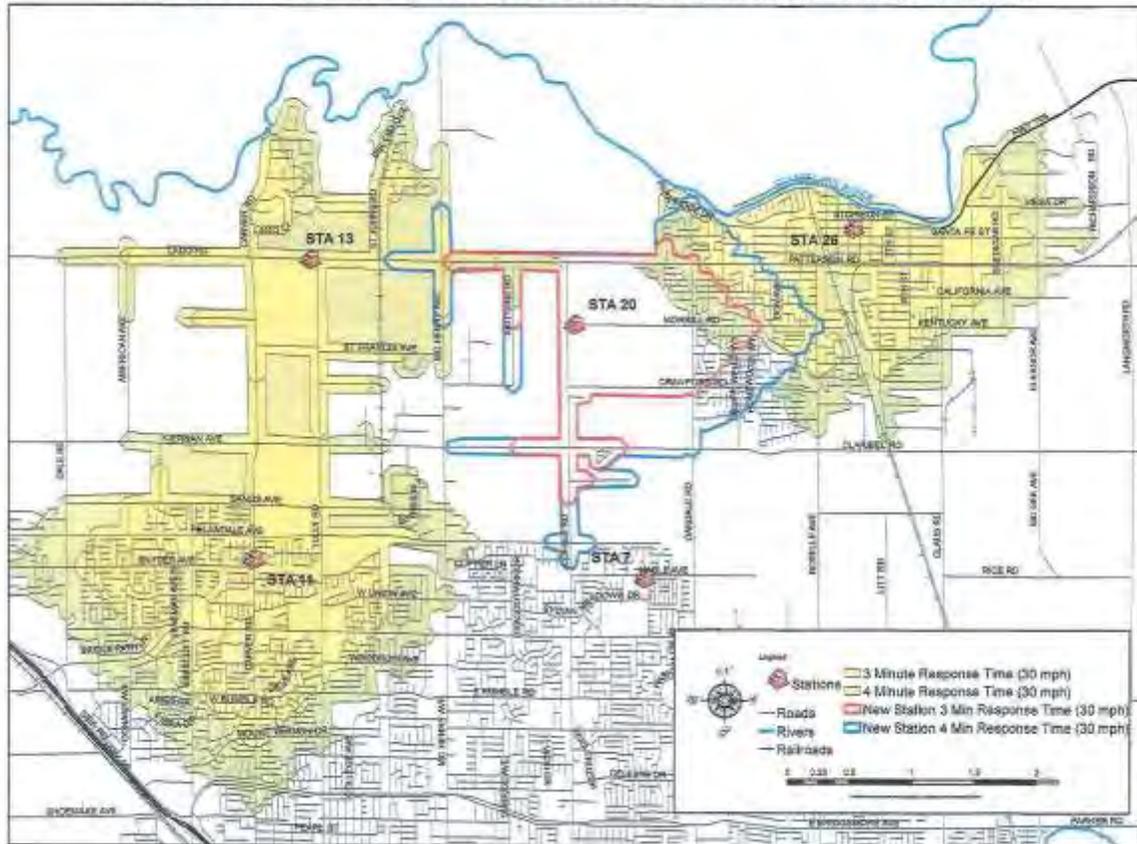
Map 17b. Riverbank Proposed Station 2: 5-Minute Response

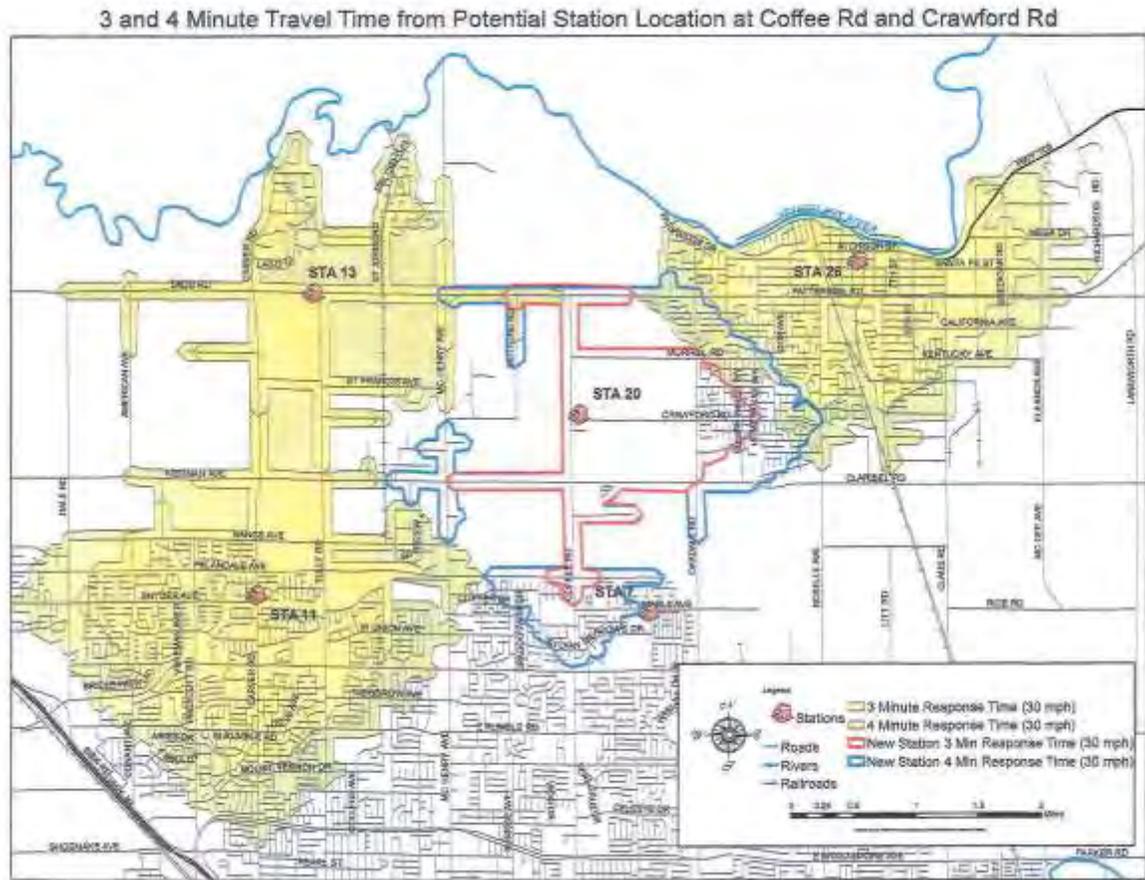


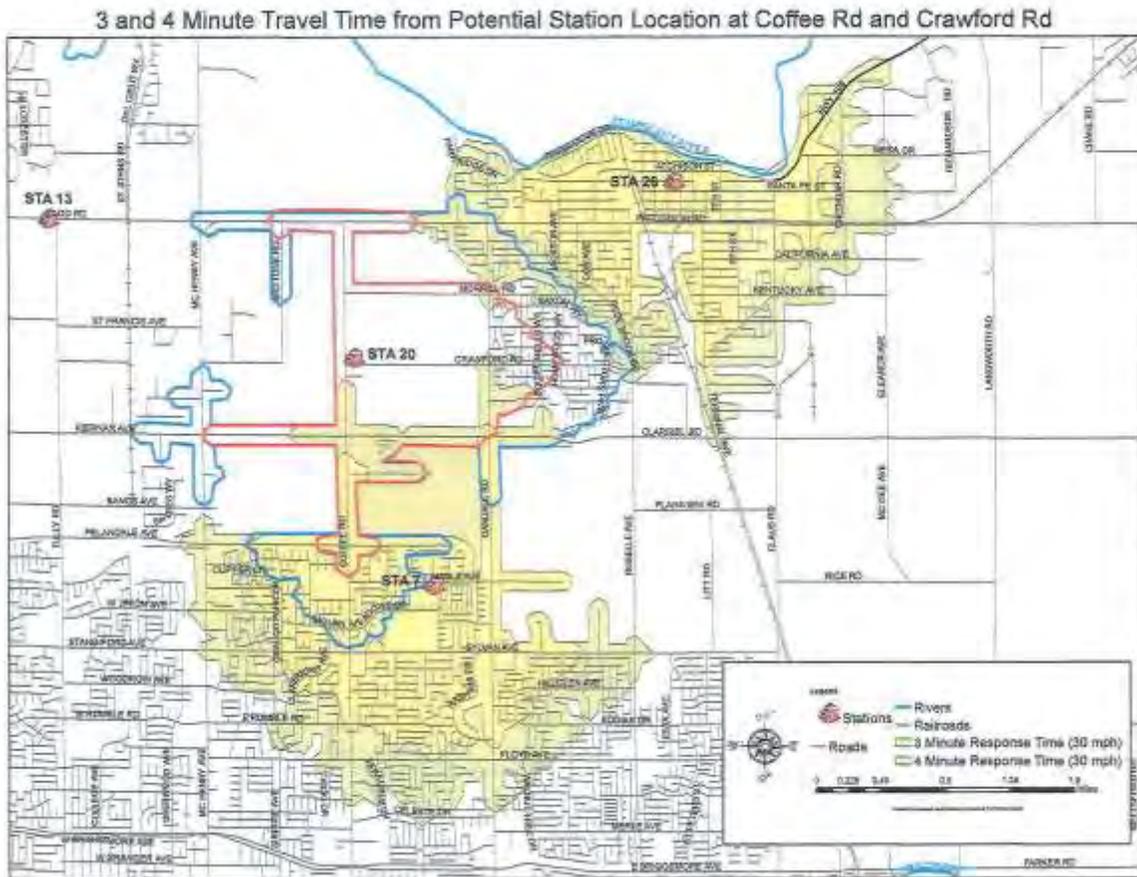
Map 17c. Riverbank Proposed Station 3: 5-Minute Response



3 and 4 Minute Travel Time from Potential Station Location at Coffee Rd and Morrill Rd







**Response to Letter A: Christopher Diaz, Best Best & Krieger, LLP**

**Response A-1:** This comment is noted. This comment serves as an introduction to the comment letter from Stanislaus Consolidated Fire Protection District (District). It is noted that all of the comments included in the Notice of Preparation letters submitted to the City during the public comment period were considered during preparation of the Draft EIR and are included in Appendix A of the Draft EIR. No further response is necessary.

**Response A-2:** The commenter notes that the Draft EIR references the CEQA standard in Chapter 3.10, which requires the City to determine whether the Project would “conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project... adopted for the purpose of avoiding or mitigating an environmental effect.”

This comment services as an introduction statement leading into more specific comments and concerns related to fire service. See Responses A-3, A-4, A-5, and A-6 for specific responses to each of the bulleted concerns.

**Response A-3:** The commenter notes that 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.

It is noted that the City’s adopted Design Standards for water facilities require adequate fire flow pressure.<sup>1</sup> Specifically, the City’s Design Standards state that “Private on-site fire protection systems include hydrants and building sprinkler systems, and shall be installed per the requirements of the City Building Code, [the City’s] Standard Specifications, and the requirements of the Stanislaus Consolidated Fire District.” The City anticipates that the District will continue to be an active partner in permitting and project specific applications and approvals.

Impacts associated with fire services are discussed in Chapter 3.12, Public Services and Recreation, of the Draft EIR. The policy referenced in the comment (Policy Public-7.1) is included on page 3.12-10 of the Draft EIR. As noted on page 3.12-18 of the Draft EIR, the City of Riverbank and the District will work cooperatively to ensure new development pays its fair share for facilities associated with new growth. The imposition of Fire Mitigation Fees provide the financial tools necessary to guarantee capacity to serve will be available in the future. In addition, the General Plan recognizes the need for increased fire services for new development and sets forth policies that support fire protection staffing, facilities, and minimum fire flow requirements. Ultimately, the City of Riverbank would have oversight for assessing future fees for the Project, and it is their intent to collect development fees to offset the demand for new services.

The proposed Project water supply is discussed in Section 3.14.2, Water Supplies, of Chapter 3.14, Utilities, of the Draft EIR. As discussed on pages 3.14-17 and 3.14-18, it is

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<sup>1</sup> <https://www.riverbank.org/DocumentCenter/View/634/STANDARDS-WATER-SECT-5>

estimated that at full build-out for the entire General Plan area (i.e., future demand within the City limits and General Plan Area), the projected water demand will be 3.4 times the 2010 production, or 14,610 acre-feet per year (AFY). Suggested facilities for the entire General Plan Area include the addition of sixteen new groundwater wells (including Well No. 11), each at a capacity of 1,500 gallons per minute (gpm). These additional wells are needed in order to meet 20 percent reserve capacity provisions and maximum daily demands, as well as fire flows and emergency storage requirements at buildout conditions. It is noted that the proposed CWSP would require a decreased water supply compared to what would be allowed under the City's current General Plan land use designations for the site. No additional mitigation is needed in the Draft EIR.

**Response A-4:** The commenter notes that the "Draft EIR does not reference or address City General Plan Policy PUBLIC-7.3, which requires that that 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 commenter further states that "The Draft EIR does state that "a fire station site" would "be located near the corner of Crawford and Oakdale Road" and, while the site is marked on Figure 2.0-8, the Conceptual Land Use Plan, the size of the site is never disclosed. (Draft EIR, p. 2.0-6.)" The commenter indicates that the Fire District preliminarily estimates that a minimum 1.25-acre site may be needed to meet the District's needs, and that it should be capable of encompassing 20 parking stalls, 4,000 square feet of administrative office space, and a 6,000 square foot fire station. The commenter indicates that the Fire District believes a further assessment is necessary.

This comment is noted. As noted on pages 3.12-17, 3.12-18, and 3.13-16 of Chapters 3.12 and 3.13, the Draft EIR identifies the potential location for an additional fire station (near the corner of Crawford Road and Oakdale Road) and provides a proposed size of the site for the fire station (between one and three acres). The Draft EIR also identifies and analyzes the potential impacts to the environment that would result from the physical construction of the new fire station. See the discussion in Impact 3.12-2 on pages 3.12-17 and 3.12-18. Given the identification of the size of the potential site in the Draft EIR and the discussion of potential impacts of the additional fire station, the potential environmental impacts of a new fire station are appropriately analyzed in the Draft EIR.

It is noted that the Draft EIR was prepared as a Program EIR pursuant to CEQA Guidelines Section 15168. The program-level analysis considers the broad environmental effects of the CWSP. As noted on page 1.0-2 of the Draft EIR, the program-level approach is appropriate for the CWSP because it allows comprehensive consideration of the reasonably anticipated scope of the development plan; however, not all aspects of the future development are known at this stage in the planning process. Development projects in the Plan Area that require further discretionary

approvals will be examined in light of this EIR to determine whether additional environmental documentation must be prepared.

In regards to the second bullet point of this comment, impacts associated with fire service were not determined to be significant and unavoidable because of the “lack of certainty as to the timing of the construction of the future fire station”, as stated in the comment. Instead, impacts associated with fire service were determined to be significant and unavoidable because construction of the fire department facilities would cause adverse physical environmental impacts. As stated on page 3.12-18 of Chapter 3.12, development of a fire station within the proposed Plan Area would contribute to significant and unavoidable impacts related to aesthetics (Impacts 3.1-1 and 4.2), agricultural resources (Impacts 3.2-1 and 4.4), air quality (Impacts 3.3-1, 3.3-2, and 4.5), greenhouse gases (Impacts 3.7-1, 3.7-2, and 4.9), noise (Impacts 3.11-3 and 4.17), and transportation and circulation (Impacts 3.13-1, 3.13-2, 3.13-5, 3.13-6, 3.13-7, 3.13-8, 3.13-10, 3.13-15, 3.13-16, 3.13-17, 3.13-18, 3.13-20, 3.13-22, 3.13-23, 3.13-24, 3.13-25, 3.13-26, 3.13-27, 3.13-28, 4.17, 4.19, 4.20, 4.21, 4.23, 4.25, 4.26, 4.27, 4.28, 4.29, 4.30, and 4.31).

The commenter references statements made in the Draft EIR that the timing of construction of the fire station proposed within the Project area is unclear, as the District will ultimately control that development process. The Draft EIR analyzes the potential impacts to the environment that could result from physical construction of the new fire station, based on the information known to the City at this time. The potential environmental impacts caused by construction of a new fire station were appropriately analyzed for the purposes of the Draft EIR.

**Response A-5:** The commenter notes that City General Plan Policy-7.5 is not referenced or addressed in the Draft EIR. As stated on page 3.12-11 of Chapter 3.12, Public Services and Recreation, of the Draft EIR, Policy PUBLIC-7.5 requires that the City coordinate with fire protection providers to an emergency response system 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; second alarm assignment within 15 minutes of dispatch; and an Insurance Service Office (ISO) rating of Class 2 for areas within the City. The City will continue to coordinate with the District to ensure that the emergency response standards are met. This Policy does not require a CEQA document to include a traffic analysis regarding ingress and egress, as stated in the comment. Adequate equipment, staffing, facilities and response times for fire protection services are issues that are not physical impacts to the environment that must be addressed through the EIR process, or require mitigation under CEQA.

Impacts associated with emergency vehicle access are discussed in Impact 3.13-31 in Chapter 3.13, Transportation and Circulation, of the Draft EIR. As discussed, access to the Project site would be provided along Oakdale Road, Claribel Road, Crawford Road, and Morrill Road. Because the Project consists of multiple vehicular access points, emergency vehicles can access the site from multiple directions. Therefore, the

Project's impact related to emergency vehicle access would be less than significant. No mitigation is required.

The City fully recognizes, however, that issues regarding adequate response times are vital to ensuring public safety in any new development. Issues regarding District response times will, therefore, be addressed in the Plan for Services to be submitted as part of the annexation application to LAFCO. LAFCO will evaluate whether adequate equipment, staffing, and facilities will be provided once annexation occurs and the impact of the annexation on the local agencies involved, including the District. The City will work closely with the District throughout the annexation application process to ensure that the District's concerns with regard to response times will be reviewed and addressed.

**Response A-6:** The commenter raises issues regarding coordination amongst emergency medical service (EMS) providers and funding for EMS staffing levels. These comments relate to service and operational levels, which are not environmental impacts that are required to be analyzed under CEQA. See Response A-5, which notes that the City recognizes that swift response times are vital to ensuring public safety in any new development. District response times will be addressed in the Plan for Services to be submitted as part of the annexation application to LAFCO.

As stated on page 3.12-11 of Chapter 3.12, Public Services and Recreation, of the Draft EIR, Policy PUBLIC-7.4 notes that the City will coordinate with fire protection providers, including through reciprocity arrangements, to ensure equipment, staffing, and facilities for emergency medical services, urban search and rescue, hazardous materials emergency response, and other relevant needs, as appropriate. The City will continue to coordinate with the District to ensure that these listed needs are met, and to ensure consistency with National Fire Protection Association and District response requirements.

**Response A-7:** The commenter requests that a mitigation measure comparable to Mitigation Measure 3.12-1 which would apply to operational services with the District be included in the Draft EIR.

Issues raised by the commenter regarding fee structures do not involve physical changes to the environment requiring analysis or mitigation under CEQA. In addition, the City notes that the District is authorized to adopt special assessments, community facilities districts, and other taxing mechanisms to raise additional revenue for fire services. As noted in Response A-5, concerns regarding the District's ability to serve the Project area and plan for needed facilities will be addressed as part of the Plan for Services and LAFCO annexation proceedings. The City has adopted mitigation fees on behalf of the District to ensure that facilities are funded appropriately by new development. Although mitigation fees are outside the scope of CEQA, the City will continue to address these issues with the District throughout the processing of this Project.

**Response A-8:** This comment is noted. Most of the concerns identified by the commenter are outside of the scope of CEQA; however, as noted previously, they are issues that will be addressed through LAFCO annexation proceedings for the Project. The City looks forward to resolving these issues proactively, not through litigation.

Over the past year, the District and the City have been engaged in a productive dialogue. That effort has been an important element of the City's development of the Draft EIR and the CWSP. The City remains a willing partner to address the District's concerns throughout these and future proceedings regarding the CWSP.

**DEPARTMENT OF TRANSPORTATION**  
 OFFICE OF THE DISTRICT 10 DIRECTOR  
 P.O. BOX 2048, STOCKTON, CA 95201  
 (1976 E. DR. MARTIN LUTHER KING JR. BOULEVARD 95205)  
 PHONE (209) 948-7943  
 FAX (209) 948-3670  
 TTY 711  
 www.dot.ca.gov



*Making Conservation  
 a California Way of Life.*

July 27, 2018

**10-STA-108-PM Various  
 Crossroads West Specific Plan  
 DEIR and TIS  
 SCH #2017032062**

John B. Anderson  
 City of Riverbank  
 6706 3<sup>rd</sup> Street, South Hall  
 Riverbank, CA 95367

Dear Mr. Anderson:

The California Department of Transportation appreciates the opportunity to have reviewed the Draft Environmental Impact Report and Traffic Impact Study for the Crossroads West Specific Plan. The Specific Plan area is located on 380 acres of land bounded by Oakdale Road to the east, Claribel Road to the south, the MID Main Canal and the Riverbank city limits on the north, and by property lines that are approximately 0.5 miles west of Oakdale Road. The plan would include approximately 2453 residential units at completion as well as mixed use, parks, open space, and Regional Sports Park uses. The Department has the following comments:

B-1

- The Department does not agree with Impact and Mitigation 3.13-1 (Impact and Mitigation E-1 in the TIS). The proposed project will degrade Intersection 1 (SR 108/Coffee Rd) from an average delay of 40.2 seconds to an average delay of 477.1 seconds. This is a significant impact caused by this proposed development and impact fees alone are not sufficient mitigation. The intersection must be improved.
- Under Existing Conditions, the TIS found that a traffic signal at Intersection 1 is warranted. For the Signal Warrants Study, it appears that only Warrant 3 Peak Hour was used. To approve a traffic signal, all nine warrants listed in the California Manual of Traffic Control Devices (CA MUTCD) must be used.
- Please provide full Sim Traffic files. It was observed that your Synchro Files which were delivered cannot be run in SimTraffic. See the screen shot of the errors displayed below.

B-2

B-3

B-4

*"Provide a safe, sustainable, integrated and efficient transportation system  
 to enhance California's economy and livability"*

Mr. John B. Anderson  
 July 27, 2018  
 Page 2



B-4  
 cont'd

- The Department recommends a Complete Streets approach to planning transportation in this development.
  - Facilities such as sidewalks, crosswalks, and bike lanes should be included to provide access between residences and nearby parks, schools, and commercial areas.
  - Secure bicycle storage facilities, such as bicycle racks, should also be included at parks, schools, and stores.
  - The Department also recommends bus stops near the development to serve residents.
  
- An Encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act. Therefore, environmental studies may be required as part of the encroachment permits application. A qualified professional must conduct any such studies undertaken to satisfy the Department's environmental review responsibilities. Ground disturbing activities to the site prior to completion and/or approval of required environmental documents may affect the Department's ability to issue a permit for the project. Furthermore, if engineering plans or drawings will be part of your permit application, they should be prepared in standard units.

B-5

B-6

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."*

Mr. John B. Anderson  
July 27, 2018  
Page 3

Please contact Nicholas Fung at (209) 948-7190 or by e-mail sent to [nicholas.fung@dot.ca.gov](mailto:nicholas.fung@dot.ca.gov) or myself at (209) 941-1921 or by email sent to [tom.dumas@dot.ca.gov](mailto:tom.dumas@dot.ca.gov) if you have any further questions.

B-7

Sincerely,



FOR

TOM DUMAS, CHIEF  
Office of Metropolitan Planning

*Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability.*

**Response to Letter B: Tom Dumas, California Department of Transportation**

**Response B-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response B-2:** The commenter states that “The Department does not agree with Impact and Mitigation 3.13-1 (Impact and Mitigation E-1 in the TIS). The proposed project will degrade Intersection 1 (SR 108/Coffee Rd) from an average delay of 40.2 seconds to an average delay of 477.1 seconds. This is a significant impact caused by this proposed development and impact fees alone are not sufficient mitigation. The intersection must be improved.”

Impacts associated with the State Route (SR) 108 (Patterson Road) / Coffee Road intersection (Intersection 1) are discussed in pages 3.13-30 through 3.13-32 of Chapter 3.13, Transportation and Circulation, of the Draft EIR. As noted on page 3.13-30 of the Draft EIR, improvements to the intersection would cause a significant impact at this location, and with mitigation the impact would be improved. However, because improvements to this location are subject to Caltrans’ approval process regarding design, installation, and improvements, the City cannot be certain that the improvements would be installed before the impact occurs. Because there is no guarantee regarding the timing of installation, the possibility of an interim significant impact exists and the impact conclusion in the EIR is significant and unavoidable. It is noted that improvements to this location are already included in the City of Riverbank’s Traffic Impact Fee Program. Mitigation Measure 3.13-1 requires payment of the applicable Riverbank Impact Fee towards the improvement to this intersection to cover the proposed projects fair share of the improvement. As such, the City will work with California Department of Transportation (Caltrans) to install traffic improvements as warranted.

**Response B-3:** The commenter states that “Under Existing Conditions, the TIS found that a traffic signal at Intersection 1 is warranted. For the Signal Warrants Study, it appears that only Warrant 3 Peak Hour was used. To approve a traffic signal, all nine warrants listed in the California Manual of Traffic Control Devices (CA MUTCD) must be used.”

Impacts associated with the SR 108 (Patterson Road) / Coffee Road intersection (Intersection 1) are discussed in pages 3.13-30 through 3.13-32 of Chapter 3.13, Transportation and Circulation, of the Draft EIR. As noted on page 3.13-30 of the Draft EIR, improvements to address the potential impact to this intersection would include installation of a roundabout intersection or improvements that involve auxiliary turn lanes and a traffic signal. Either option would result in a level of service (LOS) that satisfies the City of Riverbank’s minimum LOS requirement, thus reducing the environmental impact to an insignificant level. Under current Caltrans directives, the exact nature of the needed improvement cannot be confirmed without completion of an ICE Report, which is a separate planning process to determine design specifics. The City recognizes that Caltrans typically requires a complete evaluation of all traffic signal

warrants prior to installing a traffic signal, which will be a component of any improvement plans. The intent of the EIR analysis is to simply identify traffic impacts under the City's LOS standards, disclose those impacts, and offer mitigation measures that would reduce the impact. The EIR has accurately analyzed and disclosed the impact, and offered mitigation that would reduce the impact. Additional analysis will be performed to determine the intersection design, including completion of an ICE report. A complete traffic signal warrants study addressing all applicable warrants would be part of the ICE Report.

**Response B-4:** The commenter states that "Please provide full Sim Traffic files. It was observed that your Synchro Files which were delivered cannot be run in SimTraffic. See the screen shot of the errors displayed below."

The Synchro-SimTraffic suite of software is typically employed for impact analysis. In this case, LOS based on Synchro results was employed and is applicable, and the Synchro model files were provided to Caltrans as requested for their review. Synchro files are the input to SimTraffic simulation analysis, and Caltrans staff found that system errors relating to Synchro default settings prevented the model from performing simulation. This deficiency does not affect the Draft EIR LOS analysis based on Synchro, and the Draft EIR results and conclusions remain valid.

The updated files were provided to Caltrans District 10. The Synchro files were reviewed, and changes were made to allow Caltrans to perform SimTraffic simulation. These changes had no effect on the Draft EIR's Synchro-based results. It is important to note that the length of delays and accompanying LOS resulting from Synchro analysis and from SimTraffic simulation are often different. The differences may result from the interaction between closely spaced intersection that are not inherent to Synchro. In addition, simulation intentionally incorporates varying random traffic flow characteristics, resulting in different results from run to run. While the results of Synchro and Simtraffic may vary, Synchro analysis is recognized as an adequate tool for CEQA traffic analysis and is regularly accepted by the cities of Riverbank, Modesto and Stanislaus County, as well as by District 10.

**Response B-5:** The commenter recommends a Complete Streets approach to planning transportation for the project. The commenter further recommends facilities such as sidewalks, crosswalks, and bike lanes be included to provide access between residences and nearby parks, schools, and commercial areas. The commenter recommends secure bicycle storage facilities, such as bicycle racks, be included at parks, schools, and stores, and that bus stops be installed.

The CWSP includes requirements for all transportation modes, including facilities for pedestrians, bicyclists and transit users. The proposed circulation and alternative transportation system is discussed on pages 2.0-8 through 2.0-10 of Chapter 2.0, Project Description, of the Draft EIR. As discussed, development of the CWSP would include arterial streets with sidewalks and bike lanes, collector streets with sidewalks and bike

lanes (where applicable), and local residential streets with sidewalks. 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 Plan Area to encourage walking and jogging. Additionally, bus routes and other public transit options will be planned for within the confines of 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 High Density Residential and Mixed Use 1 areas.

Various mitigation measures included throughout the Draft EIR also require the timely implementation and construction of various alternative transportation improvements. Mitigation Measure 3.7-1 in Chapter 3.7, Greenhouse Gases, Climate Change, and Energy, requires actions that further reduce vehicle miles traveled, such as providing transit hubs, community multimodal paths and trails, and general pedestrian connectivity throughout the site. Mitigation Measure 3.13-8 in Chapter 3.13, Transportation and Circulation, requires each applicant to identify and install pedestrian crossing features to the satisfaction of the City Engineer. Mitigation Measure 3.13-9 requires each applicant to monitor pedestrian, bicycle, and motor vehicle safety conditions and install improvements to alleviate any observed concerns. Further, Mitigation Measure 3.13-10 requires the applicants to work with Stanislaus Regional Transit to identify and install transit facilities and features in order to ensure that transit facilities are incorporated into the Project. Mitigation Measure 3.13-12 in requires timely installation of transit improvements.

**Response B-6:** The commenter states “An Encroachment Permit will be required for work (if any) done within the Department's right of way. This work is subject to the California Environmental Quality Act. Therefore, environmental studies may be required as part of the encroachment permits application. A qualified professional must conduct any such studies undertaken to satisfy the Department's environmental review responsibilities. Ground disturbing activities to the site prior to completion and/or approval of required environmental documents may affect the Department's ability to issue a permit for the project. Furthermore, if engineering plans or drawings will be part of your permit application, they should be prepared in standard units.”

This comment is noted. An Encroachment Permit would be obtained for any work done within the Caltrans Right of Way as a result of the proposed CWSP.

**Response B-7:** This comment is noted. This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.



**City of Modesto**  
**Community and Economic**  
**Development Department/Planning Division**  
 1010 Tenth Street, Third Floor  
 Modesto, CA 95334

August 2, 2018

John B. Anderson  
 Project Planner  
 City of Riverbank, Development Services Dept.  
 6707 3<sup>rd</sup> Street  
 Riverbank CA 95367

RE: Crossroads West specific plan Draft EIR (DEIR)

Dear Mr. Anderson:

Thank you for the opportunity to review the Crossroads West specific plan Draft EIR (DEIR). The Crossroads West specific plan project ("Project") site is located adjacent to the City of Modesto (City) General Plan / Sphere-of-Influence boundary along Claribel Road. As reflected in the DEIR, the proposed Project will significantly impact City and regional transportation system(s). City staff would appreciate the opportunity to have a constructive dialogue with the City of Riverbank towards resolving transportation related issues raised by the proposed project.

C-1

Sincerely,

Patrick Kelly, AICP  
 Planning Manager

c. Joe Lopez, City Manager

**Response to Letter C: Patrick Kelly, City of Modesto**

**Response C-1:** This comment is noted. The commenter notes that City of Modesto staff would appreciate the opportunity to have a constructive dialogue with the City of Riverbank towards resolving transportation related issues raised by the proposed project.

This comment does not specifically address the adequacy of the Draft EIR. The City of Riverbank staff will coordinate with the City of Modesto regarding the regional transportation system. No further response is necessary.



August 2, 2018

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

Board of Education

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 President

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 Superintendent

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 Deputy Superintendent  
 Chief Human Resources Officer

Virginia Johnson  
 Associate Superintendent  
 Educational Services



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

Re: Response to Draft Environmental Impact Report, Crossroads West Specific Plan

Dear Mr. Anderson,

Thank you for the Notice of Availability of the Crossroads West Specific Plan Draft Environmental Impact Report (DEIR) to Modesto City Schools.

As identified in the report, Modesto City Schools (high school district grades 9-12) and Sylvan Union School District (elementary district K-8) will serve the Crossroads West area.

D-1

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.

We have just a couple of comments on the DEIR:

- Page 3.12-21, last paragraph – The first sentence references “a fire station” and should be replace with “school facilities”.
- Because the high school students might need to be bussed to a high school site, suitable and safe school bus stops will need to be established, as well as, paths of travel to the bus stops.
- We requested that the developer work cooperatively with both the Modesto City High School District and Sylvan Union School District to develop a funding plan to build schools/capacity and to ensure mutually acceptable solutions to expected impacts including mitigation of all environmental concerns.

D-2

D-3

D-4

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

D-5

COMMUNICATE • COLLABORATE • CELEBRATE

*Page 2 – August 2, 2018 Letter of Response to DEIR, Crossroads West*

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

D-5  
cont'd

Sincerely,



Duane A. Wolterstorff  
Senior Director, Business Services  
Modesto City Schools  
426 Locust Street  
Modesto, CA 95351  
209.492.5002

c: Dr. Sara Noguchi, Superintendent, Modesto City Schools  
Tim Zearly, Associate Superintendent, Business Services, Modesto  
City Schools  
Debra Hendricks, Superintendent, Sylvan Union School District  
Yvonne Perez, Assistant Superintendent, Sylvan Union School  
District

**Response to Letter D: Duane Wolterstorff, Modesto City Schools**

**Response D-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response D-2:** This comment is noted and the Draft EIR has been revised in order to reflect this recommendation. Revisions to the Draft EIR are identified with Chapter 3.0, Errata, with revision marks (underline for new text, ~~strike-out~~ for deleted text). The following change was made to page 3.12-21 of Chapter 3.12 of the Draft EIR:

It is noted, however, that development of school facilities ~~a fire station~~ within the proposed Plan Area would contribute to significant and unavoidable impacts related to aesthetics (Impacts 3.1-1 and 4.2), agricultural resources (Impacts 3.2-1 and 4.4), air quality (Impacts 3.3-1,3.3-2, and 4.5), greenhouse gases (Impacts 3.7-1,3.7-2, and 4.9), noise (Impacts 3.11-3 and 4.17), and transportation and circulation (Impacts 3.13-1, 3.13-2, 3.13-5, 3.13-6, 3.13-7, 3.13-8, 3.13-10, 3.13-15, 3.13-16, 3.13-17, 3.13-18, 3.13-20, 3.13-22, 3.13-23, 3.13-24, 3.13-25, 3.13-26, 3.13-27, 3.13-28, 4.17, 4.19, 4.20, 4.21, 4.23, 4.25, 4.26, 4.27, 4.28, 4.29, 4.30, and 4.31). Therefore, consistent with the analysis included in this Draft EIR, impacts related to constructing new school facilities to serve the proposed Project are considered **significant and unavoidable**.

None of the revisions identify new significant environmental impacts, nor do any of the revisions result in substantive changes to the Draft EIR. The new information to the Draft EIR is intended to merely clarify the information.

**Response D-3:** The commenter requests that suitable and safe school bus stops be established, as well as paths of travel to the bus stops.

Bus stops and paths to the stops would be provided. As noted on pages 3.13-38 and 3.13-39 of Chapter 3.13, Transportation and Circulation, pedestrian and bicycle activity would occur as development in the Plan Area proceeds, and the proposed improvements are consistent with the Stanislaus Council of Governments (StanCOG) Non-Motorized Transportation Master Plan. The proposed alternative transportation circulation is shown in Figure 2.0-10 in Section 2.0, Project Description. The CWSP identifies the locations of Class II bike lanes on Morrill Road, Crawford Road, and on a portion of the new N-S Collector. Class I bike trails are planned along Oakdale Road, the new N-S Collector, the MID Main Canal at the north end of the Plan Area, and along MID Lateral #6 to the south. These facilities would be linked by a trail on western Morrill Road and on the N-S Collector. A Class I trail is also planned along Claribel Road. Ultimately, pedestrian facilities would be created along the frontage of future development associated with the Project.

Additionally, Mitigation Measure 3.13-8 requires each project applicant in the Plan Area to work with City of Riverbank staff to identify applicable pedestrian crossing features and to install the features, when warranted, to the satisfaction of the City of Riverbank City Engineer. Mitigation Measure 3.13-9 requires each project applicant in the Plan

Area to monitor pedestrian, bicycle, and motor vehicle safety conditions as development proceeds. Any identified safety conditions as a result of this monitoring would be installed to alleviate these concerns, as applicable, to the satisfaction of the City of Riverbank City Engineer.

**Response D-4:** The commenter requests that the developer work with the Modesto City High School District and Sylvan Union School District to develop a funding plan to build schools/capacity and to ensure mutually acceptable solutions are created to address impacts and concerns.

This comment is noted. This comment does not specifically address the adequacy of the Draft EIR, but rather serves as a request to consult and coordinate with the School Districts.

**Response D-5:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.



1231 Eleventh St.  
P.O. Box 4880  
Modesto, CA 95202  
(202) 456-7474

July 19, 2018

City Of Riverbank – Development Services Department  
8707 3rd St  
Riverbank, CA 95367-2305

**RE: Environmental Impact Report – Crossroads West Specific Plan  
Location: Oakdale Rd., Claribel Rd., & MID's Main Canal**

Thank you for allowing the District to comment on this referral. Following are the recommendations from our Electrical, Irrigation and Domestic Water Divisions:

E-1

**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) Crossroads West Specific Plan (Crossroads) area lies within MID's irrigation service area. 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.
  - Specific Plan Page 23 Item 1 – The proposed Class I Bike Trail must remain outside of MID's 100' Main Canal right-of-way.
  - Specific Plan Page 25 Item 3 – A License Agreement shall be required for the proposed vehicle and pedestrian crossing of MID's Lateral No. 6. A bridge must be constructed for both crossings of MID's Lateral No. 6. The proposed Trail along the north side of MID Lateral No. 6 must remain outside of MID's 130' right-of-way.
  - Specific Plan Page 34 Figure 5 – The existing MID crossing located at the MID Main Canal shall not be incorporated for use in the Specific Plan.

E-2

ORGANIZED 1957 • IRRIGATION WATER 1984 • POWER 1923 • DOMESTIC WATER 1994

- Specific Plan Page 71 section 7.2.2 *Proposed Water System* – A License Agreement shall be required for the proposed water system that lies within MID's Lateral No. 6.
- Specific Plan Page 74 section 7.3.3 *Proposed Sanitary Sewer System* – A License Agreement shall be required for the proposed sanitary sewer system that lies within MID's Lateral No. 6.
- Specific Plan Page 76 Figure 15 – The proposed sanitary sewer pipeline and lift station along the south side of MID's Lateral No. 6 must remain outside of MID's 130' right-of-way.
- Specific Plan Page 79 paragraph 4 – Future stormwater discharge into MID's Lateral No. 6 is limited in capacity. Therefore, modification of the existing Crossroads MID Discharge Agreement will need to be discussed with MID Civil Engineering Department staff. Approval of modifications to the existing Agreement will be at the discretion of the MID Board of Directors.
- Specific Plan Page 104 section 8.4.5 *Wall and Fencing* – A six-foot masonry wall, or MID pre-approved equivalent, is required adjacent to the MID Main Canal right-of-way and the MID Lateral No. 6 right-of-way.
- Should the project impact or otherwise alter existing improvement district infrastructure, the facilities must be upgraded, replaced, and/or relocated as required by MID.
- Should an improvement district pipeline require an upgrade, replacement, and/or relocation, MID requires a dedicated fifteen (15) foot irrigation easement located parallel and adjacent to the proposed PUE if located along a roadway.
- Should the proposed project impact or otherwise alter the existing private infrastructure, MID recommends the developer consult with those who are served by the existing private infrastructure. The Developer should provide private irrigation easements for the benefit of those served by the existing private infrastructure to ensure that existing downstream users can have access to irrigation water and can continue to irrigate.
- 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 storm events and must meet water quality requirements set forth by MID.
- 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.
- 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 future MID easement/right-of-way.
- No public access, other than pedestrian and vehicle crossings, will be permitted within MID Lateral right-of-way. Access control gates shall be installed at all proposed MID Lateral crossings.
- MID will require a Facility Modification Agreement before any work can be done on MID irrigation infrastructure.

F-2  
cont'd

City of Riverbank  
 Response Letter: Environmental Impact Report  
 July 19, 2018  
 Page 3

- The Developer must provide drainage for stormwater runoff that may accumulate between the MID Lateral 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.

E-2  
cont'd

#### Domestic Water

- No Comments at this time.

#### Environmental

- No Comments at this time.

E-3

#### Electrical

- The attached maps show the approximate location of the District's existing electrical facilities within the project area.
- In conjunction with related site improvement requirements, existing overhead and underground electric facilities within or adjacent to the proposed improvements shall be protected, relocated, or removed as required by the District's Electric Engineering Department. Any relocation or installation of electric facilities shall conform to the District's Electric Service Rules. Appropriate easements for electric facilities shall be granted as required. Additional easements may be required with future development of this property.
- Costs for relocation of the District's existing electrical facilities at the request of others will be borne by the requesting party. Estimates for relocating or installing MID electric facilities will be supplied upon request.
- High voltage is present within and adjacent to the project area. These include 69,000 volts transmission, 12,000 volts primary and secondary underground and overhead facilities. Use extreme caution when operating heavy equipment, using a crane, ladders, scaffolding or hand held tools or any other type of equipment near the existing MID electric lines and cables. Assume all overhead and underground electric facilities are energized.
- The District's Electric Engineering Department is concerned about construction dirt/dust falling on MID electric facilities at the Claribel Substation during the construction phase of this project. The MID high voltage electric facilities require protection from dirt/dust. Do not dig new utility trenches, grade, level or dig building foundations without effective construction dust control measures in place. Windblown dirt/dust on electric facilities at the MID Claribel Substation and may cause a power outage.
- The contractor shall verify actual depth and location of all underground utilities prior to start of construction. Notify "Underground Service Alert" (USA) (Toll Free 800-227-2600) before trenching, grading, excavating, drilling, pipe pushing, tree planting, post-hole digging, etc. USA will notify all utilities to mark the location of any underground facilities.

E-4

City of Riverbank  
Response Letter: Environmental Impact Report  
July 13, 2016  
Page 4

- Please contact Modesto Irrigation District at (209) 526-7337 or (888) 335-1643 and ask for the Electrical Engineering Design Group if you have any questions or concerns.

E-4  
cont'd

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.

E-5

Sincerely,



Lien Campbell  
Risk & Property Analyst

Copy: File



**Response to Letter E: Lien Campbell, Modesto Irrigation District**

**Response E-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response E-2:** The commenter notes that their agency operates an expansive system of canals, ditches, and pipelines to provide irrigation services to the area. The commenter indicates that urban development within the MID service area typically requires upgrades and relocation of existing infrastructure to accommodate the new development. The commenter asserts that their agency will not allow a piecemeal relocation of infrastructure and recommends pre-consultation with their Engineering staff during preliminary planning efforts. Finally, the commenter provides a list of several requested conditions of approval related to irrigation.

The comment does not specifically address the adequacy of the Draft EIR, but rather is a comment regarding the infrastructure planning in the CWSP. The City has received this comment and will include conditions of approval for consideration by the City Council. The City recognizes that the developer will need to work with the MID regarding the MID's infrastructure relocations/upgrades. It is anticipated that any relocations/upgrades would be contained within the boundary of the Specific Plan area. The exact design of infrastructure, however, is anticipated to be developed through the improvement plan process. This process would require coordination with the MID for any infrastructure relocations/upgrades of the MID's facilities.

**Response E-3:** This comment is an extension of E-2, where the commenter provides a list of several requested conditions of approval. These conditions related to Environmental. The commenter notes that there are no comments regarding environmental. No further response is necessary.

**Response E-4:** This comment is an extension of E-2, where the commenter provides a list of several requested conditions of approval. These conditions related to electrical.

The comment does not specifically address the adequacy of the Draft EIR, but rather is a comment regarding the infrastructure planning in the CWSP. The City has received this comment and will include conditions of approval for consideration by the City Council. The City recognizes that the developer will need to work with the MID regarding the MID's infrastructure. It is anticipated that any relocations/upgrades would be contained within the boundary of the Specific Plan area. The exact design of infrastructure is anticipated to be developed through the improvement plan process, which would require coordination with the MID for any infrastructure relocations/upgrades of MID's facilities.

**Response E-5:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.

Annabel D. Gammon

7025 N. Park Ridge Court, Riverbank, CA 95367

Via mail: handcarried : John B. Anderson, Project Planner of Riverbank

Development Services Department

6707 3<sup>rd</sup> Street, Riverbank, CA 95367

Via email: [john@jbandersonplanning.com](mailto:john@jbandersonplanning.com)

RE: Draft Environmental Impact Report

Crossroads West Specific Plan (SCH: 2017032062)

Dear Mr. Anderson,

Thank you for the opportunity to provide comments regarding the subject, Draft EIR, Crossroads West Specific Plan.

The City of Riverbank proposes to annex the approximately 380 acre Plan area of which 226.38 is designated prime farm land. The current uses in the planned area is predominately agricultural operations.

Build out of Crossroads West Specific Plan will impact the environment from beginning to end and it would be advisable to consider some measures for mitigation. For starters, the footprint is enormous and should be adjusted down.

Policy Cons-3.1 The new Sustainable Agricultural Strategy ("SAS) approach indicates that mitigation for projects that have significant impact on the conversion of Important Farmland will be provided, yet defers the determination of significance and formulation of feasible mitigation. One of the purposes of CEQA is to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternative or mitigation measures available that would substantially lessen any significant effects that the project would have on the environment. The SAS policy does not include an enforceable performance standard to ensure that mitigation actually occurs.

Also, I would like to know whether there were other stakeholders or citizens that were included in the Committee that discussed the Sustainable Agricultural Strategy resulting in the City of Riverbank's Resolution No. 2016-022 dated February 2016. Was the committee comprised of members of the Riverbank Council only?

F-1

F-2

F-3

F-4

The City clearly has the authority to require measures that address agricultural land impacts under its general police powers as well as under CEQA. Cities and counties may impose exactions under the general police power granted in Article XI, Section 7 of the California Constitution. The police power is the right of a local government to protect the public health, safety and welfare of its residents.

F-5

The Crossroads West Specific Plan is driven by economic growth as its priority. It does not protect the public health, safety and welfare of its residents. It appears that traffic congestion, air quality deterioration, noise levels below the acceptable level of service; basically the quality of life of citizens and stakeholders will deteriorate. The build out is very ambitious and the priority irresponsible by those who will determine the way we live.

F-6

The environmentally superior alternative of the "Offsite Location Alternative" needs some discussion other than what is shown on Table 5.0-1.

F-7

My suggestions on the project are:

1. More time for more discussion and comment before the Final EIR.
2. Compose a plan to Build out in Phases.
3. Implement Triggers of Mitigation. ( City of Riverbank is still using the Programmatic EIR when the General Plan Update was certified a decade ago, claiming that it is still "current").
4. Determine what agency should be the body to implement the requirements of mitigation.
5. Tighten the mitigation measures.
6. More time for public and agency input. I do not think this project is ready to go to the Final EIR phase. There are many questions still not answered and mitigation measures unclear and general.

F-8

I appreciate the opportunity to submit my comments regarding the City of Riverbank's DEIR for Crossroads West Specific Plan.

F-9

If you have any questions, please feel free to contact me at 209 869 2374 or by email at: [annabel.gammon@gmail.com](mailto:annabel.gammon@gmail.com)

Sincerely,

Annabel Gammon

**Response to Letter F: Annabel D. Gammon, Resident of Stanislaus County**

**Response F-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response F-2:** The commenter notes that the proposed Project will impact the environment from beginning to end, and that the footprint is enormous and should be adjusted down. The commenter recommends considering some mitigation measures.

This comment is noted. The environmental impacts associated with development of the Project site are discussed throughout the Draft EIR. In some cases, there is a potential for the project to have a significant impact, but mitigation measures are identified to reduce the impact to an insignificant level. In some cases, however, significant and unavoidable impacts would occur, as summarized on pages 4.0-33 through 4.0-36 of Chapter 4.0, Other CEQA-Required Topics, of the Draft EIR.

The DEIR does consider four alternatives to the proposed Project, two of which included a reduced footprint. These alternatives were developed based on input from City staff, and the technical analysis performed to identify the environmental effects of the proposed Project. The alternatives analyzed in this EIR include the following four alternatives in addition to the proposed Project.

- **No Project (No Build) Alternative:** Under this alternative, development of the Plan Area would not occur, and the Plan Area would remain in its current existing condition.
- **Off-Site Location Alternative:** Under this alternative, the proposed Project would be developed with the same amenities as described in the Project Description, but at an off-site location.
- **Increased Density Alternative:** Under this alternative, the proposed Project would be developed with the same amenities as described in the Project Description, but the density of the residential uses would be increased, and the total development footprint would be decreased.
- **Lower Density Alternative:** Under this alternative, the proposed Project would be developed in such a way to promote larger lot sizes and to reduce the overall footprint of the developed areas.

**Response F-3:** The commenter references Policy Con 3.1, the new Sustainable Agricultural Strategy (SAS), and asserts that the determination of significance and formulation of feasible mitigation measures is deferred. The commenter further asserts that the SAS policy does not include an enforceable performance standard to ensure that mitigation actually occurs.

Impacts associated with agricultural resources are discussed in Chapter 3.2 of the Draft EIR. As discussed, development of the proposed Project would result in the permanent conversion of approximately 226.38 acres of Prime Farmland, 85.55 acres of Unique

Farmland, and 35.46 acres of Farmland of Local Importance, as shown on Figure 3.2-1, to nonagricultural use. The loss of 347.39 acres of Important Farmland as classified under the FMMP is considered a potentially significant environmental impact. It is noted that the City's General Plan EIR anticipated development of the Plan Area as part of the overall evaluation of the build out of the City. The General Plan EIR addressed the conversion and loss of agricultural land that would result from the build out of the General Plan (General Plan Recirculated Draft EIR, pp. 4.3-10 through 4.3-17). The General Plan EIR determined that even with the implementation of all available feasible mitigation, which includes General Plan goals, policies, and implementation measures (i.e., Policies CONS-3.1, CONS-3.2, LAND-1.1, LAND-1.2, LAND-1.3, LAND-1.4, LAND-5.2, LAND-2.3, LAND-3.3, and Implementation Strategies CONS-1 and CONS-2), the impact to important farmland would be significant and unavoidable.

In order to reduce impacts to Important Farmland to the extent feasible, the DEIR for the proposed project includes Mitigation Measure 3.2-1, which requires the Project applicant to secure permanent protection of offsite farmland based on a 1:1 ratio to the amount of gross Farmland converted as a result of Project development. This is consistent with the requirements of the City's Sustainable Agricultural Strategy and it is enforceable. Permanent preservation would consist of the purchase of agricultural conservation easements granted in perpetuity from willing seller(s), enforceable deed restrictions, purchase of banked mitigation credits, or other conservation mechanisms acceptable to the City. Land set aside for permanent preservation would: (1) be of equal or better soil quality, have a dependable and sustainable supply of irrigation water, and be located within Stanislaus County; and (2) not be previously encumbered by a conservation easement of any nature.

As part of this mitigation measure, the permanent protection of farmland would be accomplished by either: (1) the landowner/developer working directly with an established farmland trust or similar organization, such as the Central Valley Farmland Trust, and providing certification satisfactory to the City that such lands have been permanently preserved at the specified ratio; or (2) it is the City's intent to work with a qualified land trust or similar organization, such as the Central Valley Farmland Trust, to establish a fee for agricultural land conservation easements.

Further, Mitigation Measure 3.2-2 requires the Project applicant to participate in the Stanislaus LAFCo's Agricultural Preservation Policy (as amended on March 25, 2015), consistent with the City's Sustainable Agricultural Strategy. The Project applicant would then prepare a "Plan for Agricultural Preservation", which would include information such as the Project's direct and indirect impacts to agricultural resources, the availability of other lands in the City of Riverbank's existing boundaries, and relevant General Plan policies. The Plan would also specify the method or strategy proposed to minimize the loss of agricultural lands.

Mitigation Measure 3.2-1 and 3.2-2 are both intended to mitigate the loss of agricultural land to the extent feasible. Mitigation Measure 3.2-1 contains performance measures that are fully enforceable by the City.

**Response F-4:** The commenter provides a question regarding stakeholders/citizen involvement in the development of the SAS.

This question is noted and directed to City staff. The comment does not address the adequacy of the Draft EIR.

**Response F-5:** The commenter notes that the City has the authority to require measures that address agricultural land impacts under its general police powers as well as under CEQA.

The comment does not address the adequacy of the Draft EIR. See Response F-3 regarding the mitigation measures that the Project applicant would be subject to. Additionally, Mitigation Measure 3.2-3 is required in order to reduce conflicts with adjacent agricultural lands. This measure requires “Right to Farm” language to be presented to the City for approval and recordation against the affected property.

**Response F-6:** The commenter states that the Project does not protect the public health, safety, and welfare of the Riverbank residents. The commenter states that traffic congestion, air quality deterioration, noise levels below the acceptable level of service, and the quality of life will deteriorate.

The Draft EIR indicates that impacts associated with aesthetics, agricultural resources, air quality, greenhouse gases, noise, public services, and traffic would be significant and unavoidable. Mitigation measures have been incorporated into the project to the extent feasible, however, impacts would remain significant and unavoidable for these topics. The remaining environmental topics would be less-than-significant, or could be mitigated to a less-than-significant level. It is also noted that Project buildout would be implemented in phases, based on future market conditions over an estimated 19-year period, through a series of future tract and parcel maps.

**Response F-7:** The commenter notes that the Offsite Location Alternative needs some discussion other than what is shown in Table 5.0-1.

The Offsite Location Alternative is discussed in detail in Chapter 5.0, Alternatives to the Proposed Project, of the Draft EIR. As discussed on page 5.0-65, under the Off-Site Location Alternative, the proposed Project would be developed with the same amenities as described in the Project Description, but at an off-site location. As shown in Figure 5.0-1, this alternative would be located within the eastern portion of the City Primary Area Sphere of Influence (SOI), north of Claribel Road, west of Eleanor Avenue, south of California Avenue, and east of Claus Road. This alternative location includes approximately 376.52 acres. The existing City land use designations for the Off-Site Location Alternative include: Community Commercial (29.1 acres), Industrial / Business

Park (77.2 acres), Lower Density Residential (127.9 acres), Medium-Density Residential (132.9 acres), and Mixed Use (2.0 acres).

Under the Off-Site Location Alternative, the same number of residential units as the proposed Project (1,539 to 2,852 units) would be constructed. Additionally, all of the residences would have equal lot sizes, and a comparable number of parks and open space uses would be located throughout the off-site location. This alternative would also plan for possible future civic uses such as an elementary school, middle school, as well as a fire station site. The Off-Site Location Alternative would include the same amount of Mixed Use areas as the Project, and would provide an estimated 387,000 to 577,000 square feet (sf) of commercial/retail uses, identical to the proposed Project.

The potential impacts associated with this alternative are discussed in detail on pages 5.0-13 through 5.0-18 of the Draft EIR. In summary, the Off-Site Location Alternative would result in similar impacts as the proposed project.

**Response F-8:** The commenter lists several concerns and requests regarding the Project.

As noted in Response F-6, Project buildout would be implemented in phases, based on future market conditions over an estimated 19-year period. Triggers for the mitigation measures are included in each mitigation measure. For example, Mitigation Measure 3.2-2 requires the Project applicants to participate in the Stanislaus LAFCO Agricultural Preservation Policy. As stated in the measure, this would be required prior to the conversion of agricultural lands in the Plan Area. The Project applicants would be the main body to implement the requirements of the mitigation measures. Public and other interested parties/agencies will have an opportunity to provide input at public hearings. The public involvement process has been consistent with the requirements of state law.

The above response clarifies and answers some of the listed suggestions. This comment does not address the adequacy of the Draft EIR. No further response or revisions to the Draft EIR are necessary.

**Response F-9:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.

August 2, 2018

Comments-Crossroads West Draft Specific Plan and EIR

I received the draft specific plan and EIR above on a DVD as requested. It did not contain the Appendixes file. I recieved this on another disc. late Wednesday August 1. The Appendix C- Cultural Resources is blank and labeled "confidential". The Draft Specific Plan Appendix B Mitigation Monitoring and Reporting Program (MMRP) is blank. Chapter 9 Project Financing Plan is blank. These are required. This draft should be recirculated with the portions included for public review. The document lists only John Anderson name, a city address and a phine number to send in comments.

G-1

General Plan

Specific Plan

EIR

Agriculture Where are the approx. 390 acres that are permanently protected based on the 1:1 ratio located? Where is the "Plan for Agricultural Preservation"?

G-2

Air Quality Where are the studies and mitigation for the effect on the air quality in the other areas of the city,

G-3

Land Use Where is the buffer between Riverbank and Modesto?

G-4

Public Services Police-The ratio for officers is 0.77, the city specifies 0.85 minimum. How much does the developer pay and how much will the taxpayers pay. Fire-Who is paying for the fire station construction? The trucks and equipment? What is the cost. Who will pay for the additional impact on Jacob Meyers Park.

G-5

Transportation The EIR does not look at the impact to 108/Atchison downtown or to First Street and the bridge. It does not look at the impact to Patterson at the Santa Fe tracks. Why? What is the CFD 2016-1 development?

G-6

Utilities Sewer- Impacts show potential 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. Who pays? To account for the additional wastewater flows in the Project area after the construction of the proposed Project, additions to the existing wastewater infrastructure will be needed. Also sewer lifts. Who pays? Water-The proposed Project would require extension of offsite water conveyance infrastructure to the Plan Area for potable water and irrigation water. Who pays?

G-7

Alternative Site The site locate adjacent to the ammo plant would have more problems. The EIR shows it equal. Where are the studies that show this? This was not mentioned before. How can

G-8

you approve an alternative site without any studies or EIR?

G-8  
cont'd

This is a hughe project with huge impacts to the city. The public should have been given the entire draft and EIR ot comment on.

G-9

Evelyn Halbert

**Response to Letter G: Evelyn Halbert, Resident of Riverbank**

**Response G-1:** This comment is noted. The Draft EIR (including the appendices) was available for public review during the 45-day public review period, which began on June 18, 2018 and ended on August 2, 2018. Copies of the Draft EIR were available for review at the Stanislaus County Library – Riverbank Branch (3442 Santa Fe Street, Riverbank), the City of Riverbank City Hall – North (6707 3rd Street, Riverbank), and the City of Riverbank City Hall – South (6617 3<sup>rd</sup> Street, Riverbank). The Draft EIR was also available on the City of Riverbank’s web site: <http://www.riverbank.org/438/Planning-Documents>.

Appendix C, Cultural Resources Information, is intended to be a confidential appendix. Information on archaeological and historical sites is exempt from public access, as provided by the California Public Records Act (California Government Code 6254.10). In addition, effective beginning in 2015, PRC 21082.3(c) provides confidentiality protections for information California tribes have provided through consultation. The State law allows information on the specific locations of archaeological sites to made available only on a “need-to-know” basis to individuals who legitimately need this information to meet their project responsibilities. This includes state, federal, and local governmental agencies, Native American Tribes, and archaeological consultants. The relevant cultural resources information needed for public review is included in Chapter 3.5, Cultural and Tribal Resources, of the Draft EIR. As noted in Chapter 3.5, a California Historical Resources Information System (CHRIS) record search was completed for the Project site by the Central California Information Center (CCIC). Pursuant to federal and State law, information within the CHRIS pertaining to historical resources of an archaeological nature is confidential. No further response is necessary.

The commenter notes that the Draft CWSP has a blank Appendix B Mitigation Monitoring and Reporting Program. This comment does not specifically address the Draft EIR, rather it is a comment on the Draft CWSP. It is noted that a Mitigation Monitoring and Reporting Program is a document that is prepared after public review of the Draft EIR. The purpose for preparing this document after public review is that mitigation measures that are presented in a Draft EIR may or may not be modified based on public comment received. Once public comment is received, mitigation measures are finalized and a Mitigation Monitoring and Reporting Program is prepared. The Mitigation Monitoring and Reporting Program is typically included in a Final EIR, which is the case for this project. A Mitigation Monitoring and Reporting Program is included as Chapter 4 of this Final EIR.

The commenter also notes that the Draft CWSP has a blank Chapter 9 Financing Plan. This comment does not specifically address the Draft EIR, rather it is a comment on the Draft CWSP.

**Response G-2:** The commenter questions where the 390 acres of farmland would be located, and questions where the “Plan for Agricultural Preservation” is.

As stated in Impact 3.2-1 on page 3.2-13 of Chapter 3.2, Agricultural Resources, development of the Project would result in the loss of 347.39 acres of Important Farmland, not 390 acres. As stated in Mitigation Measure 3.2-1, the permanently protected offsite farmland would consist of the purchase of agricultural conservation easements granted in perpetuity from willing seller(s), enforceable deed restrictions, purchase of banked mitigation credits, or other conservation mechanisms acceptable to the City. Land set aside for permanent preservation would: (1) be of equal or better soil quality, have a dependable and sustainable supply of irrigation water, and be located within Stanislaus County; and (2) would not be previously encumbered by a conservation easement of any nature.

The Project applicant would prepare a “Plan for Agricultural Preservation” prior to the conversion of agricultural lands within the Plan Area. The Plan would include information such as the Project’s direct and indirect impacts to agricultural resources, the availability of other lands in the City of Riverbank’s existing boundaries, and relevant General Plan policies. The Plan would also specify the method or strategy proposed to minimize the loss of agricultural lands.

These agricultural preservation requirements are imposed as mitigation on the project. The implementation of the mitigation would occur as any conversion of agricultural land occurs after approval of the CWSP.

**Response G-3:** The commenter asks “Where are the studies and mitigation for the effect on the air quality in the other areas of the city.”

An air quality report was not completed for the entire City. In accordance with CEQA, the air quality analysis contained in Chapter 3.3 Air Quality fully analyzed the impacts associated with the project. Construction and operational emissions were modeled using the California Emissions Estimator Model, Version 2016.3.2 (CalEEMod) using project-specific inputs, including proposed land use types and sizes and trip generation from the traffic study. CalEEMod is a computer model developed by the California Air Pollution Officers Association (CAPCOA) in collaboration with California Air Districts. The results of the CalEEMod air quality modeling are shown in Tables 3.3-6 (page 3.3-19) and 3.3-8 (page 3.3-23) of the Draft EIR.

Chapter 3.3 of the Draft EIR includes Mitigation Measures 3.3-1 through 3.3-5 in order to mitigate potentially impacts associated with air quality. See pages 3.3-21, 3.3-22, 3.3-24, and 3.3-25.

**Response G-4:** The commenter asks “Where is the buffer between Riverbank and Modesto.”

This comment does not address the adequacy of the Draft EIR. Agricultural land is located to the south and west of the Project site and currently provides a buffer between Riverbank and Modesto. Upon development of the entire Project site over the next 20 years, this existing agricultural buffer may or may not exist. The City of Modesto Sphere of Influence is located adjacent and south of the Project site. The City of

Riverbank and the developer have no control over if and when the land south of the Project site is developed with urban uses. No further response is necessary.

**Response G-5:** The commenter asks several questions related to police and fire services, as well as parks/recreation.

As noted on page 3.12-2 of Chapter 3.12, Public Services and Recreation, of the Draft EIR, approved and pending development projects in the City will result in additional demand for law enforcement services. Capital costs for new facilities and equipment would be funded through development impact fees, and operating costs would be funded through a combination of an increased tax base and the annexation to a new community facility districts (CFD) or formation of a new CFD.

Impact fees from new development are collected based upon projected impacts from each development. The adequacy of impact fees is reviewed on an annual basis to ensure that the fee is commensurate with the service. Payment of the applicable impact fees by the Project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the proposed Project, would fund capital and labor costs associated with police services. Ultimately, the City Council, in coordination with the Police Department, establish an annual budget and staffing levels for the City. The staffing levels vary from year to year based on demand and budget considerations.

The City of Riverbank and Stanislaus Consolidated Fire Protection District (SCFPD) will work cooperatively, and will ensure new development pays its fair share for facilities associated with new growth. Impact fees, combined with other funding sources, would pay for the construction of a new fire station, as well as other equipment the District may need at that time to adequately serve the Specific Plan area.

Impacts associated with park and recreational facilities are discussed on pages 3.12-22 and 3.12-23 of Chapter 3.12. As discussed, the proposed Project includes an additional 42 acres of park, open space, and Regional Sports Park uses to serve the community and surrounding area. The City's General Plan identifies a park standard based on a goal of five acres of developed parkland per 1,000 residents. The CWSP proposes to add 20 acres of neighborhood parks and 22 acres of regional parkland. Overall, this falls short of the five acres per 1,000 goal by 5.35 acres. The actual amount of parkland dedication required will be determined during Tentative Subdivision Map approval for each project in the Specific Plan area 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. These in lieu fees would be used to pay for future land acquisition and development of park space.

**Response G-6:** The commenter questions why various locations were not studied in the Traffic Impact Analysis.

The study intersections and segments were determined based on consultation with the traffic engineer, KD Anderson & Associates, and the City of Riverbank. Facilities in the City of Riverbank, Stanislaus County, and City of Modesto were determined to be the appropriate jurisdictions based on the Project's anticipated trip generation, distribution, and assignment.

As discussed on page 3.13-40 of Chapter 3.13, Transportation and Circulation, the development within Riverbank's Community Facilities District (CFD) 2016-1 is located on the east side of Riverbank off of Claus Road. This area would include up to 285 single-family residences and 72 multifamily residences east of Claus Road near Patterson Road.

**Response G-7:** The commenter asks "Who pays" for infrastructure/utilities (i.e. sewer, storm drainage, water).

Impacts associated with utilities are discussed in Chapter 3.14, Utilities, of the Draft EIR. As noted on page 3.14-10 of Chapter 3.14 of the Draft EIR, the proposed Project would require sewer allocation and would be required to pay connection fees.

As discussed on page 3.14-21 of Chapter 3.14, all planned water improvements shown are part of the City's Master Water Plan and are funded through the payment of City impact fees, also known as System Development Fees. If an adequate amount of fee revenue has not been collected when the well and/or tanks 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 applicants will provide their proportionate share of required funding to the City for the acquisition and delivery of water supplies to the Project site through connection fees and other means.

Further, as noted on page 3.14-43 of Chapter 3.14, 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.

**Response G-8:** The commenter states that the alternative location would have greater problems than the proposed project, but that it shows as equal. The commenter asks where the studies are that show this, and asks how such a site could be approved without any studies or an EIR.

This commenter requires some clarification. The Off-Site Location Alternative is not proposed for development, nor is it under consideration for granting development entitlements. Under the California Environmental Quality Act, an alternative location for a project should be analyzed in the EIR unless there are no alternative locations that

could be considered. The Off-Site Location Alternative was selected for analysis because it met certain criteria as an alternative. The Off-Site Location Alternative would be developed with the same amenities as described in the Project Description, but at an off-site location. As shown in Figure 5.0-1, this alternative would be located within the eastern portion of the City Primary Area Sphere of Influence (SOI), north of Claribel Road, west of Eleanor Avenue, south of California Avenue, and east of Claus Road. This alternative location includes approximately 376.52 acres. The existing City land use designations for the Off-Site Location Alternative include: Community Commercial (29.1 acres), Industrial / Business Park (77.2 acres), Lower Density Residential (127.9 acres), Medium-Density Residential (132.9 acres), and Mixed Use (2.0 acres).

Under the Off-Site Location Alternative, the same number of residential units as the proposed Project (1,539 to 2,852 units) would be constructed. Additionally, all of the residences would have equal lot sizes, and a comparable amount of parks and open space uses would be located throughout the off-site location. This alternative would also plan for possible future civic uses such as an elementary school, middle school, as well as a fire station site. The Off-Site Location Alternative would include the same amount of Mixed Use areas as the Project, and would provide an estimated 387,000 to 577,000 square feet (sf) of commercial/retail uses, identical to the proposed Project.

The Off-Site Location Alternative was not selected as the Environmentally Superior Alternative given that the analysis found that it would not reduce impacts related to any environmental issue.

**Response G-9:** This comment is noted. As noted in Response G-1, the Draft EIR was available for public review during the 45-day public review period, which began on June 18, 2018 and ended on August 2, 2018. Copies of the Draft EIR were available for review at the Stanislaus County Library – Riverbank Branch (3442 Santa Fe Street, Riverbank), the City of Riverbank City Hall – North (6707 3rd Street, Riverbank), and the City of Riverbank City Hall – South (6617 3<sup>rd</sup> Street, Riverbank). The Draft EIR was also available on the City of Riverbank’s web site: <http://www.riverbank.org/438/Planning-Documents>.

1010 TENTH STREET, 3<sup>RD</sup> FLOOR  
MADDESTO, CA 95354



PHONE: (209) 525-7660  
FAX: (209) 525-7643  
www.stanislauslafco.org

August 2, 2018

John B. Anderson  
City of Riverbank  
6707 3<sup>rd</sup> St.  
Riverbank, CA 95367

**SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CROSSROADS WEST SPECIFIC PLAN PROJECT**

Dear Mr. Anderson:

Thank you for the opportunity to review the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Crossroads West Specific Plan (CWSP). 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.

H-1

LAFCO staff previously commented on the Notice of Preparation for the DEIR (April 21, 2017) and identified applicable LAFCO policies and requirements in anticipation of an annexation application. LAFCO considers numerous factors when reviewing annexations, including: orderly growth, impacts to agricultural lands, impacts to special districts, and availability of services.

The following provides additional comments following review of the DEIR and Specific Plan for the project:

➤ **Timing of Annexation:** The Project Description (Section 2.0 of the DEIR) states that "project buildout would be implemented in phases, based on future market conditions over an estimated 19-year period... The phasing plan identified in Chapter 9 of the CWSP will ensure timely completion of public facilities and improvements that coincide with development." LAFCO's policies (as correctly noted later in the DEIR) require that annexation proposals demonstrate that development is imminent for all or a substantial portion of the proposal area. A 19-year growth period is not considered imminent (relative to LAFCO's other policies for planned growth areas); however, phasing of the project may more appropriately demonstrate that growth is imminent for a smaller portion of the annexation area. The referenced phasing plan in Chapter 9 of the CWSP was not included in the documents made available for our review but will be needed in order to assist the Commission in making its determinations.

H-2

➤ **Agricultural Resources:** One of LAFCO's main charges, as set forth by the Legislature, is to protect and promote agriculture. As described in the DEIR, 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. According to the DEIR, the proposed project will result in a permanent conversion and loss of 347.39 acres of Important Farmland within Stanislaus County. The proposed Mitigation Measure 3.2-1, would require securing permanent protection of offsite farmland based on a 1:1 ratio to the

H-3

Referral Response for Draft EIR – Crossroads West SP  
 August 2, 2018  
 Page 2

amount of gross farmland converted as a result of the project, consistent with the requirements of the City's Sustainable Agricultural Strategy. LAFCO Staff encourages that the City retain this mitigation measure as part of its adoption of the final EIR.

H-3  
 cont'd

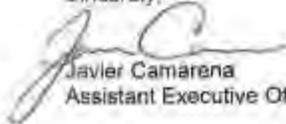
- **Plan for Providing Services:** Upon application for annexation, the City must prepare a Plan for Providing Services, consistent with Government Code §56653. The Plan must include detailed evidence of current and future service levels, sufficient sewer capacity, sufficient quantities and quality of water, police and fire services, and financing mechanisms for these services. Updated information relative to the Stanislaus Consolidated Fire Protection District and mitigation fees will be needed upon application to LAFCO. Likewise, the availability of the Financing Plan in the CWSP would be helpful to determine that appropriate financing mechanisms will be in place to support public services in the proposed area.

H-4

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

H-5

Sincerely,



Javier Camarena  
 Assistant Executive Officer

**Response to Letter H: Javier Camarena, Stanislaus Local Agency Formation Commission**

**Response H-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response H-2:** The commenter presents their understanding of the timing for building of the Specific Plan area. More specifically, the commenter notes that the Project Description describes the project building out of a 19-year period with the caveat that market forces will ultimately drive any development. The commenter emphasizes that LAFCo's policies require that annexation proposed demonstrate the development is imminent for all or a substantial portion of the proposal area, and that he views the 19-year buildout as not meeting the LAFCo policy of "imminent." The commenter then notes that a phased approach, whereby a smaller area is annexed, may be demonstrated through a phasing plan. The commenter notes that they have not seen a phasing plan for the project.

This comment is noted. As stated in the comment, Project buildout would be implemented in phases, based on future market conditions over an estimated 19-year period, through a series of future tract and parcel maps. It is noted that initial building construction would likely occur in 2019. The phasing plan is a component of the CWSP document and will be forwarded to the Stanislaus Local Agency Formation Commission (LAFCO).

**Response H-3:** The commenter notes that the proposed project would result in the loss/conversion of 347.39 acres of Important Farmland and that the EIR included Mitigation Measure 3.2-1, which requires securing permanent protection of offsite farmland based on a 1:1 ratio to offset the impact. The commenter notes this mitigation measure is consistent with LAFCo policies and should be retained as part of the adoption of the Final EIR.

This comment is noted. The City staff will retain this measure as the project application is presented to the City County for their consideration.

**Response H-4:** The commenter notes that the City would need to prepare a Plan for Providing Services, consistent with Government Code Section 56653, at the time of annexation. The Plan would need to 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.

This comment is noted. The City will require a Plan for Services, and will coordinate with LAFCo when annexation applications are submitted.

**Response H-5:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.



July 23, 2018

**TO:** JOHN B. ANDERSON, CITY OF RIVERBANK CONTRACT PLANNER

**FROM:** AMBER MINAMI, STANISLAUS COUNTY DEPARTMENT OF ENVIRONMENTAL RESOURCES

**SUBJECT:** **CITY OF RIVERBANK – NOTICE OF AVAILABILITY – CROSSROADS WEST SPECIFIC PLAN – DRAFT ENVIRONMENTAL IMPACT REPORT**

The Stanislaus County Hazardous Materials Division has reviewed the information available on the subject project. The Department provides the following conditions of approval to be implemented:

The applicant shall determine, to the satisfaction of the Department of Environmental Resources (DER), that a site containing (or formerly containing) residences or farm buildings, or structures, has been fully investigated (via Phase I study, and if necessary, Phase II study) prior to the issuance of a grading permit. Any discovery of underground storage tanks, former underground storage tank locations, buried chemicals, buried refuse, or contaminated soil shall be brought to the immediate attention of DER.

I-1

**Response to Letter I: Amber Minami, Stanislaus County Department of Environmental Resources, Hazardous Materials Division**

**Response I-1:** This comment is noted. The commenter notes that the applicant shall determine that a site containing (or formerly containing) residences or farm buildings or structures has been fully investigated prior to the issuance of a grading permit.

Impacts associated with the past uses of the site are analyzed in Chapter 3.8, Hazards and Hazardous Materials, of the Draft EIR. As noted in this Chapter of the Draft EIR, a Phase I Environmental Site Assessment (ESA) was completed for the Plan Area by Geocon Consultants, Inc. in July 2017 (see Appendix D of the Draft EIR). According to the Phase I ESA, soil staining was observed or reported at the following properties:

- Former Machado Dairy (Machado Property) – APN 074-011-009;
- Alexander Dairy (Machado Property) – APN 074-014-006;
- Harrigfeld Property (1901 Morrill Road) – APN 074-006-016.

Additionally, as also noted on page 3.8-20 of Chapter 3.8, there are seven single-family residences with associated sheds and garage structures, as well as areas that are used for farm equipment storage. The homes and adjoining structures, as well as the farm equipment storage areas, will require removal prior to any construction. If the homes and structures are demolished, they will require evaluation for asbestos and lead containing materials. If such materials are present in the demolition of the structures, special demolition and disposal practices are required in accordance with state regulations to ensure their safe handling. Mitigation Measure 3.8-2 requires additional testing to investigate whether any of the buildings, facilities, or soils in any of the above parcels contain hazardous materials. The measure also includes steps to follow should hazardous materials be found.

Additionally, existing areas containing above ground storage tanks and storage of farm equipment would require soil sampling to assess the soils in these areas. Further, groundwater wells may be located within the vicinity of the on-site residences. According to the Phase I ESA, one known well system is located at the McGrane Property (APN 074-014-007). Should other groundwater wells be present on-site, the proper well abandonment permit would be obtained. Mitigation Measure 3.8-5 requires a well abandonment permit from the Stanislaus County Department of Environmental Resources. Further, Mitigation Measure 3.8-3 requires a Phase II ESA which shall further evaluate on-site conditions if the site investigation required by Mitigation Measure 3.8-2 indicates a probability that hazardous materials may be found on any parcel.



## CHIEF EXECUTIVE OFFICE

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Assistant Executive Officer

Patrice M. Dietrich  
Assistant Executive Officer

## STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

August 7, 2018

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

**SUBJECT: ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC PLAN – NOTICE OF AVAILABILITY – DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**

Mr. Anderson:

Thank you for the opportunity to review the Draft Environmental Impact Report for the Crossroads West Specific Plan (the "Project").

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

**Transportation and Traffic (Circulation)**

1. Section 3.13 *Transportation and Circulation* incorrectly references the County's General Plan and therefore the County's requirements for transportation facilities. The document references the Circulation Element as last updated in November 2005, however the document was last updated and approved by the County Board of Supervisors on August 23, 2016.

One of the problems with using an out of date Circulation Element is that the Level of Service (LOS) criteria for County Roads was redefined as part of the update and Table 3.13-3 of the DEIR contains incorrect data.

The traffic analysis prepared for the DEIR for the Crossroads West Specific Plan should be updated to reflect these changes and correctly reference the updated Stanislaus County Circulation Element.

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1011 Van Sleet, 3rd Floor, Merced, CA 95354 Post Office Box 3408  
Merced 4200/4201 95353 Phone 209.325.8325 Fax 209.344.6220

**ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC PLAN – NOTICE OF AVAILABILITY – DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**  
**August 7, 2018**  
**Page 2**

2. The DEIR fails to address the impact of the proposed realignment of Crawford Road from Oakdale Road to Coffee Road as the proposed realignment is outside of the Projects limits. On page 3.13-17, it states this connection will be severed and reconnected with a future project. This condition violates County Improvement Standards in which dead-end roads may not exceed 500 feet in length and in such cases would require a subdivision ordinance for the remaining section of Crawford Road from Coffee Road to the proposed cul-de-sac. J-3

Section 3.13 of the DEIR fails to address the significant impact to residents in and around Crawford Road due to the realignment of Crawford Road. This significant impact needs to be identified in the DEIR, evaluated and mitigated as part of the Crossroads West Specific Plan DEIR.

3. The Project's proposed realignment of Crawford Road has a significant impact on emergency vehicle access to the area. Page 26 of the Crossroads West Draft Specific Plan does depict a condition in which the project maintains two-way emergency access only on the existing Crawford Road alignment along the western boundary of the Project. However, this is not a mitigation measure nor is the impact identified. The DEIR should recognize and mitigate the significant impact on emergency vehicle access. J-4

4. This DEIR identifies impacts to the transportation system due to the proposed Project, yet no mitigation measures are proposed to reduce the impacts. Instead the DEIR states the following impacts are "significant and unavoidable" and propose no mitigation measure to reduce the impact:

1. 3.13-8 – Coffee Road between Claribel Road and Claratina Avenue
2. 3.13-10 – Oakdale Road between Claribel Road and Claratina Avenue
3. 3.13-21 – Oakdale Road at Claratina Road Intersection
4. 3.13-28 – Roselle Avenue between Claribel Road and North County Corridor (NCC) in the City of Modesto

Under the California Environmental Quality Act (CEQA), impacts must be mitigated where reasonable mitigation measures would reduce the impact even if the impact will not be reduced to less than significant. The following reasonable mitigation measures would mitigate such significant impacts by requiring the Project to contribute its pro-rata share as required by the City of Riverbank's Adopted General Plan CIRC 1.1: J-5

1. Directly mitigating the impacts by constructing the necessary transportation improvements prior to the issuance of a building permit as required by the traffic analysis; or,
2. Establish a funding mechanism to collect the Project's fair share fees as mitigation for these facilities. The City of Riverbank should work with the adjacent agencies of Stanislaus County and the City of Modesto to coordinate and implement the required improvements. This could include a jointly administered mitigation fund between the three agencies. Priorities for projects could be jointly determined to ensure that as impacts are incurred mitigation projects could be planned as funding is available.

**ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC PLAN – NOTICE OF AVAILABILITY – DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**  
**August 7, 2018**  
**Page 3**

The DEIR does recognize mitigation for impacts to roads with the City sphere of influence while ignoring mitigation for impacts outside the sphere. For example, Impact 3.13-25 identifies impacts to the segment of Coffee Road between Crawford Road and the realigned Claribel Road as significant and unavoidable because it does not exist in any adopted fee program, yet identified a reasonable mitigation measure of requiring each project applicant to contribute its fair share to the cost of improving this segment.

J-5  
cont'd

In the DEIR, these same reasonable mitigation measures applied within the City's Sphere of Influence, should be applied to impacts outside the City's sphere.

5. Claribel Road is classified as a Class B expressway in the StanCOG 2010 Regional Expressway Study and as such:

Class "B" Expressways are partially access-controlled with traffic controlled intersections at arterial roads and other expressways. Collectors and local roads are permitted right-in, right-out access only at specified intervals ranging from a quarter to half mile...

J-6

The proposed intersection of the new North-South (N-S) Collector is not consistent with the Regional Expressway Study.

Mitigation Measure 3.13-3 should be updated to state that until such time that the North County Corridor is constructed and Claribel Road is realigned, only right-in and right-out access shall be provided on Claribel Road as to not interrupt safe and efficient regional freight and goods movement.

6. Under the Cumulative Plus Project scenario's traffic analysis, the document incorrectly identifies the segments of Oakdale Road, Roselle Road, and Coffee Road south of the proposed North County Corridor alignment and north of Claratina Avenue as being improved with the NCC through Regional Transportation Impact Fees (RTIF). These roadways south of the current locally preferred alignment, alignment 1-B, only transition to existing conditions and are not being improved through RTIF collection.

J-7

Therefore, the DEIR should include mitigation measures that require the Project to pay its fair share of improvements for roadway impacts on Coffee Road (Impact 3.13-8), Oakdale Road (Impact 3.13-10), and Roselle Avenue (Impact 3.13-21).

7. In various cases under impacts in Section 3.13, the RTIF is cited under projects which are not included in the RTIF program which misrepresents each impact as being funded by the RTIF.

In Section 3.13, the DEIR identifies several significant impacts to roadways, but incorrectly states that the RTIF will fund projects that will mitigate these impacts. However, the projects identified are not funded by the RTIF, therefore the proposed mitigation measures are ineffective.

J-8

The DEIR should include mitigation measures that require the Project to pay its fair share of improvements for roadway impacts that incorrectly assume RTIF participation.

**ENVIRONMENTAL REFERRAL – CITY OF RIVERBANK – CROSSROADS WEST SPECIFIC  
PLAN – NOTICE OF AVAILABILITY – DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
August 7, 2018  
Page 4**

8. The proposed locally preferred alternative 1-B of the North County Corridor Project should be considered in the site plan effort of the Crossroads West Specific Plan. Project development in the southern most proposed Mixed Use (MU-1) zone should be set-back and reserved for the future Claribel Road realignment such that it does not unduly burden the development of the North County Corridor. The preferred alignment is currently undeveloped agricultural land and any changes to the land use on the realignment of Claribel Road will also impact the proposed N-S Collector and should be considered and accounted for in the Traffic and Circulation section of the DEIR.

J-9

The ERC appreciates the opportunity to comment on this project.

J-10

Sincerely,



Patrick Cavanah  
Sr. Management Consultant  
Environmental Review Committee

PC:ss

cc: ERC Members

Note on County General Plan Provisions

The provisions of using a City's development standards within their sphere is included under "Other Requirements" on Page II-9 of the updated Circulation Element.

<http://www.stancounty.com/planning/pl/gp/current/gp-chapter2.pdf>

RTIF Comments

J-11

"City of Riverbank does not control the RTIF"

This statement is used in unrelated impacts to the RTIF program. It is generally followed up by "The area is within the limits of the NCC project area", but the NCC is not necessarily going to mitigate these locations as described. Specifically, the cumulative scenario does not include the segments immediately south of the NCC between NCC and Claratina.

RTIF as mitigation to direct impacts

The RTIF does not currently have sufficient funds to construct the NCC to mitigate the immediate and direct impacts of the proposed project. The DEIR is assuming that the direct impacts of the project only will be mitigated by a future project that is not fully funded. The project should contribute for its fair share of offsite impacts

J-12

For instance, Impact 3.13-15 recognizes there are considerable interim impacts to the intersection of Kiernan/Claribel/McHenry, but considers the NCC as the mitigation. The timing of the required improvements should be such that they are constructed along with the proposed project, not waiting for the build out of an extremely large regional project that will take years to construct.

RTIF References

The following impacts only consider the segments between Claribel Rd and NCC, while ignoring south of the NCC. As such, they also assume that RTIF will make the necessary improvements, however, the proposed project's land use was not considered in the development of the NCC.

Impact 3.13-27

Oakdale Rd Impact is stated between Claribel Rd and NCC (In the city of Modesto), which today is not inside the City only in their Sphere, and does not include the segments south the NCC to Claratina.

J-13

Impact 3.13-28

Roselle Ave Impact is stated between Claribel Rd and NCC (In the city of Modesto), which today is not inside the City only in their Sphere, and does not include the segments south the NCC to Claratina. There should be a mitigation measure to address widening of Roselle at minimum from Claribel to NCC.

Mitigation Measure 3.13-16 (Impact 3.13-20)

States that a second northbound left turn lane at Claribel/Oakdale Rd shall be added as determined by the City of Riverbank Engineer, however, this approach is outside of the jurisdiction and should therefore be "as determined by the Stanislaus County Road Commissioner".

J-14

Other Notes

The County would not take issue with the project mitigating it's impacts outside it's jurisdictional boundary and therefore where the DEIR has suggested that these impacts cannot be guaranteed outside of the City of Riverbank, the County could enter into an agreement for improvements on County roads that are directly impacted by the project. For instance, Mitigation Measure 3.13-2 includes partial mitigation on a segment outside of the City of Riverbank, but inside the County and the City of Modesto Sphere, this language and these types of mitigations can be included for the projects immediate and direct impacts.

J-15

**Response to Letter J: Patrick Cavanah, Stanislaus County Environmental Review Committee**

**Response J-1:** This comment serves as an introduction to the comment letter and does not warrant a response. No further response is necessary.

**Response J-2:** The commenter states that “Section 3.13 Transportation and Circulation incorrectly references the County's General Plan and therefore the County's requirements for transportation facilities. The document references the Circulation Element as last updated in November 2005, however the document was last updated and approved by the County Board of Supervisors on August 23, 2016.” The commenter further states “One of the problems with using an out of date Circulation Element is that the Level of Service (LOS) criteria for County Roads was redefined as part of the update and Table 3.13-3 of the DEIR contains incorrect data. The traffic analysis prepared for the DEIR for the Crossroads West Specific Plan should be updated to reflect these changes and correctly reference the updated Stanislaus County Circulation Element.”

This comment is noted and the Draft EIR has been revised to reference the current version of the Stanislaus County Circulation Element. Revisions to the Draft EIR are identified with Chapter 3.0, Errata, with revision marks (underline for new text, ~~strike out~~ for deleted text). The following changes were made to pages 3.13-7 and 3.13-8 of Chapter 3.13 of the Draft EIR:

### STANISLAUS COUNTY FACILITIES

Service levels for roadways in Stanislaus County are determined by comparing traffic volumes for selected roadway segments with the daily LOS capacity thresholds. These thresholds are shown in Table 3.13-3 and were developed for the Stanislaus County Circulation Element (Dowling Associates Inc., November 2005). The Stanislaus County thresholds are much lower than the City of Riverbank thresholds. This is due to the rural nature of Stanislaus County roadways. Rural roadway capacities are based on different characteristics than urban roadways, such as amount of time spent following another vehicle.

**TABLE 3.13-3: STANISLAUS COUNTY ROADWAY SEGMENTS – LOS CRITERIA**

FACILITY TYPE	MAXIMUM DAILY VOLUME				
	LOS A	LOS B	LOS C	LOS D	LOS E
2-lane Collector – Rural Minor	700	1,900	3,400	5,900	10,000
2-lane Collector – Rural Major	700	1,900	3,400	5,900	10,000
4-lane Collector – Rural Major	5,600	9,400	13,200	15,800	20,000
2-lane Arterial	1,400	3,800	6,800	11,800	20,000
4-lane Arterial – Rural Minor	12,000	20,000	28,000	33,600	40,000
4-lane Arterial – Rural Principal	10,080	16,520	23,760	28,440	36,000
	15,000	25,000	35,000	42,000	50,000

SOURCE: TRAFFIC ANALYSIS OF STANISLAUS COUNTY CIRCULATION ELEMENT (DOWLING ASSOCIATES INC, NOVEMBER 2005); STANISLAUS COUNTY GENERAL PLAN CIRCULATION ELEMENT (AUGUST 23, 2016).

The changes would not affect any study intersections, and while slightly different results were created on two roadway segments under County jurisdiction, no new impacts or mitigation measures were identified as a result of these revisions.

**Response J-3:** The commenter states “The DEIR fails to address the impact of the proposed realignment of Crawford Road from Oakdale Road to Coffee Road as the proposed realignment is outside of the Projects limits. On page 3.13-17, it states this connection will be severed and reconnected with a future project. This condition violates County Improvement Standards in which dead-end roads may not exceed 500 feet in length and in such cases would require a subdivision ordinance for the remaining section of Crawford Road from Coffee Road to the proposed cul-de-sac.” The commenter further states that “Section 3.13 of the DEIR fails to address the significant impact to residents in and around Crawford Road due to the realignment of Crawford Road. This significant impact needs to be identified in the DEIR, evaluated and mitigated as part of the Crossroads West Specific Plan DEIR.”

The planned termination of Crawford Road and construction of a new Crawford Road extension from the CWSP Area to Coffee Road is consistent with the City of Riverbank’s Circulation Element. This issue was subject to public discussion during the General Plan Update process, and many alternatives to address residents’ desire to avoid through traffic between Oakdale Road and Coffee Road were identified and evaluated. Copies of public comments received on this issue during the General Plan Update process have been forwarded to Stanislaus County.

**Response J-4:** The commenter states “The Project’s proposed realignment of Crawford Road has a significant impact on emergency vehicle access to the area. Page 26 of the Crossroads West Draft Specific Plan does depict a condition in which the project maintains two-way emergency access only on the existing Crawford Road alignment along the western boundary of the Project. However, this is not a mitigation measure nor is the impact identified. The DEIR should recognize and mitigate the significant impact on emergency vehicle access.”

An Emergency Vehicle Access will be created to link the western portion of Crawford Road with the street system within CWSP. With this improvement, emergency access to the established neighborhood along Crawford Road will be similar to that which exists today. Additionally, as noted on page 3.13-60 of Chapter 3.13 of the Draft EIR, access to the Project site would be provided along Oakdale Road, Claribel Road, Crawford Road, and Morrill Road. Because the Project consists of multiple vehicular access points, emergency vehicles can access the site from multiple directions. Therefore, the Project’s impact related to emergency vehicle access would be less than significant. No mitigation is required.

**Response J-5:** The commenters states “This DEIR identifies impacts to the transportation system due to the proposed Project, yet no mitigation measures are proposed to reduce the impacts. Instead the DEIR states the following impacts are “significant and unavoidable”

and propose no mitigation measure to reduce the impact: 3.13-8 - Coffee Road between Claribel Road and Claratina Avenue, 3.13-10- Oakdale Road between Claribel Road and Claratina Avenue, 3.13-21 - Oakdale Road at Claratina Road Intersection, and 3.13-28 - Roselle Avenue between Claribel Road and North County Corridor (NCC) in the City of Modesto.” The commenter also indicates that impacts must be mitigated where reasonable mitigation measures would reduce the impact even if the impact will not be reduced to less than significant. The commenter indicates that mitigation should include requiring the Project to contribute its pro-rata share within and outside the City’s SOI.

All of the identified impact locations listed in the comment (Impacts 3.13-8, 3.13-10, 3.13-21, and 3.13-28) are currently within the unincorporated area of Stanislaus County, but are also within the City of Modesto’s Sphere of Influence. In each case, the Draft EIR text notes that roadway improvements are included in the City of Modesto’s Capital Facilities Fees (CFF) fee program, but that because the City of Riverbank does not control the Modesto CFF program, there is no guarantee that the necessary improvements will be completed.

The City of Riverbank and City of Modesto have met to discuss the options for establishing an inter-jurisdictional funding mechanism for the roadway improvements listed in the Draft EIR. The City of Riverbank will continue to explore the feasibility of entering into a roadway improvement mitigation agreement with the City of Modesto. In the absence of an adopted agreement and guarantee that these Modesto CFF projects would be constructed, potential impacts remain significant and unavoidable.

While background cumulative conditions will exceed adopted minimum standards, the identified cumulative impact to the Oakdale Road / Claratina Road intersection (Impact 3.13-21) was not significant based on the incremental change in delay caused by CWSP, and mitigation was not required.

**Response J-6:** The commenter states “Claribel Road is classified as a Class B expressway in the StanCOG 2010 Regional Expressway Study...” The commenter further states that “The proposed intersection of the new North-South (N-S) Collector is not consistent with the Regional Expressway Study.” The commenter recommends that “Mitigation Measure 3.13-3 should be updated to state that until such time that the North County Corridor is constructed and Claribel Road is realigned, only right-in and right-out access shall be provided on Claribel Road as to not interrupt safe and efficient regional freight and goods movement.”

The Stanislaus County General Plan Circulation Element identifies Claribel Road as a Minor Arterial in the area between its connections to the future North County Corridor (NCC) alignment east of Coffee Road and west of Claus Road. The Stanislaus County Circulation Element (page II-5) is noted below, with excerpts from Table II-3 of the Circulation Element also presented:

The function of a Minor Arterial is to carry moderate- to high-volume traffic to and from collectors to other Minor Arterials, Principal Arterials, Expressways, and Freeways with a secondary function of land access. Minor Arterials located within areas zoned for heavy or light industrial or that are expected to carry large or heavy trucks shall be constructed to Industrial Major Collector standards. Limited direct access is provided to abutting property. On-street parking will be permitted only where Public Works has determined that traffic flow and safety conditions allow on-street parking. Pedestrian and bicycle facilities may be provided on these types of roadways. Farm machinery is permitted on these types of highways. There are different design standards associated with the Urban and Rural Minor Arterial classifications, as depicted in Table II-3.

**TABLE II-3  
FUNCTIONAL CLASSIFICATIONS = TYPICAL ROADWAY CHARACTERISTICS**

AREA	FUNCTIONAL CLASSIFICATION	TYPICAL ROW WIDTH	ROW AT INTERSECTIONS	LANES	INTERSECTING ROADWAYS	PRIVATE PROPERTY ACCESS	MOBILITY / OPERATING SPEED
Urban	Minor Arterial	110'	160'	4-6	1 per ½ mile	limited	Medium-High
Rural	Minor Arterial	110'	160'	2-4	1 per ½ mile	limited	Medium-High

*INTERSECTING ROADWAYS.* THE VALUES IN THIS COLUMN REPRESENT THE TYPICAL MAXIMUM NUMBER OF INTERSECTIONS ALONG THE VARIOUS TYPES OF ROADWAYS. IN SOME CASES, THE NUMBER OF INTERSECTIONS MAY BE GREATER; HOWEVER, A TRAFFIC ANALYSIS WILL BE REQUIRED INDICATING THAT THE SAFETY AND FUNCTION OF THE ROADWAY WILL NOT BE SIGNIFICANTLY COMPROMISED.

*PRIVATE PROPERTY ACCESS.* PRIVATE PROPERTY ACCESS TO ROADWAYS MAINTAINED BY STANISLAUS COUNTY IS GRANTED THROUGH THE ISSUANCE OF AN ENCROACHMENT PERMIT BY THE DEPARTMENT OF PUBLIC WORKS. NO ACCESS TO PRIVATE PROPERTY WILL BE PERMITTED ON FREEWAYS OR EXPRESSWAYS. ACCESS TO LOCAL ROADWAYS WILL GENERALLY BE APPROVED; HOWEVER, GUIDELINES FOR DRIVEWAYS ON LOCAL ROADWAYS IN URBAN AREAS HAVE BEEN ESTABLISHED IN THE STANISLAUS COUNTY PUBLIC WORKS STANDARDS AND SPECIFICATIONS. GENERALLY, DRIVEWAYS ON OTHER ROADWAY TYPES WILL BE PERMITTED; HOWEVER, THE NUMBER OF DRIVEWAYS WILL BE LIMITED TO PRESERVE THE SAFETY AND FUNCTION OF THE ROADWAY. IN SOME CASES JOINT DRIVEWAYS SERVING MORE THAN ONE PARCEL MAY BE REQUIRED.

The general location of the proposed North-South Collector street is consistent, which may be adjusted east or west at the time of review and approval of the tentative maps on the MU-1 Property, with the City of Riverbank’s Circulation Element which places the route midway between Coffee Road and Oakdale Road, which are themselves one-mile apart. The CWSP frontage along Claribel Road is ½ mile long. The CWSP proposes to move the North South Collector street intersection on Claribel Road to the east. The proposed North-South Collector intersection is consistent with the intent of the Stanislaus County and Riverbank Circulation Elements.

**Response J-7:** The commenter states “Under the Cumulative Plus Project scenario's traffic analysis, the document incorrectly identifies the segments of Oakdale Road, Roselle Road, and Coffee Road south of the proposed North County Corridor alignment and north of Claratina Avenue as being improved with the NCC through Regional Transportation Impact Fees (RTIF). These roadways south of the current locally preferred alignment, alignment 1-B, only transition to existing conditions and are not being improved through RTIF collection. Therefore, the DEIR should include mitigation measures that require the Project to pay its fair share of improvements for roadway impacts on Coffee Road (Impact 3.13-8), Oakdale Road (Impact 3.13-10), and Roselle Avenue (Impact 3.13-21).”

As noted in Table 3.13-12 on page 3.13-24 of Chapter 3.13, within the study area, only the NCC and McHenry Avenue from Ladd Road to the San Joaquin County line are Regional Transportation Impact Fee (RTIF) projects. The Draft EIR intends to convey that the footprint of the future NCC includes improvements to these roads and that these limited portions of each road were, therefore, addressed by RTIF fees (which help fund NCC). The discussions of this issue within the Draft EIR and associated traffic study have been revised to address NCC funding. Revisions to the Draft EIR are identified with Chapter 3.0, Errata, with revision marks (underline for new text, ~~strike-out~~ for deleted text). The following change was made to page 3.13-24 of Chapter 3.13 of the Draft EIR:

### **Public Facilities Fee Program / Regional Traffic Impact Fee**

Development in Stanislaus County and its incorporated cities pay fees toward the cost of circulation system improvements of regional benefit through the Public Facilities Fee (PFF) program's Regional Transportation Impact Fee (RTIF). The PFF was last published in September 2017. The planned update to the Stanislaus County Public Facilities Fee have yet to be adopted. The draft regional fees project list is shown in Table 3.13-12.

The North County Corridor (NCC) is a project that is included for funding in the PFF program. However, the PFF is only one source of funds that would be needed to compete the NCC, as federal and state funds are also needed.

The following changes were made to pages 3.13-34 and 3.13-35 of Chapter 3.13 of the Draft EIR:

### **Impact 3.13-6: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from McHenry Avenue to Coffee Road. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the segment of Claribel Road from McHenry Avenue to Coffee Road would operate at LOS E. Because the Project will cause the minimum LOS standard to be exceeded, this impact is potentially significant.

Improving the LOS in this area would either require widening Claribel Road to six lanes from McHenry Avenue to Coffee Road, or creating additional parallel east-west capacity to reduce the volume of traffic on Claribel Road. While the Project could contribute funds as a fair share towards widening Claribel Road to six-lanes as far as Coffee Road, there is no other source of funds to complete this work. The future NCC will widen a portion of Claribel Road and will also provide parallel east-west capacity, and this improvement is included in the County's RTIF. RTIF fees are a portion of the long-term funding needed to complete the NCC, and federal and State funding is also needed. As with any regional improvement, short-term impacts may occur during the period prior to completion of the NCC. Because the NCC is already included in the adopted RTIF program, payment of the adopted fees would mitigate the Project impact. However, because the City of Riverbank does not control the County RTIF program, and because funding to complete the NCC is uncertain, there is no guarantee that the NCC will be constructed in time to mitigate the

Project impact. Even with implementation of the following mitigation, the proposed Project would have a **significant and unavoidable** impact.

MITIGATION MEASURE(S)

**Mitigation Measure 3.13-5:** *Prior to issuance of any Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Connector in order to satisfy their fair share obligation.*

**Impact 3.13-7: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from Oakdale Road to Claus Road. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the two-lane segments of Claribel Road from Oakdale Road to Claus Road would operate at LOS F with the addition of Project trips, which exceeds the City of Riverbanks' minimum LOS D standard. Because the Project will cause the minimum LOS standard to be exceeded, this is a potentially significant impact.

Improving the LOS in this area would either require widening Claribel Road to four lanes, or creating additional parallel east-west capacity to reduce the volume of traffic on Claribel Road. Widening Claribel Road is included in the City of Riverbank Impact Fee program. The NCC would provide parallel east-west capacity, and this improvement is included in the County's RTIF program. However, RTIF is only one source of NCC Funding, and state and federal funds will also be needed to complete the project. As with any regional improvement, short term impacts may occur during the period prior to completion of programmed improvements.

Because the widening Claribel Road is already included in the City of Riverbank Impact Fee program and the NCC is already included in the adopted County RTIF program, paying the adopted fees would mitigate the Project's impact. However, because the City of Riverbank does not control the County RTIF program, and because funding for NCC is not secured, there is no guarantee that the NCC will be constructed in time to mitigate the Project impact. Even with implementation of the following mitigation, the proposed Project would have a **significant and unavoidable** impact.

MITIGATION MEASURE(S)

**Mitigation Measure 3.13-6:** *Prior to issuance of Building Permits for the Project, each project applicant in the Plan Area shall pay the applicable City of Riverbank Impact Fee and County RTIF fee towards the improvement of Claribel Road from Oakdale Road to Claus Road in order to satisfy their fair share obligation.*

The following changes were made to page 3.13-37 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-10: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Oakdale Road between Claribel Road and Claratina Avenue, located in the City of Modesto. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the two-lane section of Oakdale Road between Claribel Road and Claratina Avenue in the City of Modesto would operate at LOS F. Because LOS F exceeds the City of Modesto's minimum LOS D standard, and Project trips would increase the v/c ratio by more than 0.05, this is a potentially significant impact.

Improving the LOS in this area would require improving Oakdale Road to Modesto's four-lane arterial street standard. This improvement is included in the City of Modesto's CFF traffic impact fee program. However, development in the City of Riverbank does not contribute Modesto CFF fees. This area is also within the project limits of the NCC, and the limited portion of Oakdale Road within the NCC Footprint Oakdale Road is likely to be widened with this improvement project funded via CFF fees. Because no mechanism exists for the Project to contribute to the cost of improvements in the City of Modesto, and because the City of Riverbank does not control the RTIF or Modesto CFF program, there is no guarantee that the City of Modesto would allocate CFF funds to this improvement. As such, because installation cannot be assured by the City of Riverbank, this impact would be **significant and unavoidable**.

The following change was made to page 3.13-49 of Chapter 3.13 of the Draft EIR:

The NCC project included the following study area improvements:

- Realignment of Claribel Road west of CWSP along a new alignment to Coffee Road, with improvements to Coffee Road between the NCC and Claribel Road.
- Realignment of Claribel Road east of Roselle Avenue over the BN&SF to a new intersection on Claus Road.

It is important to note that NCC funding will be provided by a combination of RTIF funds collected from new development, as well as federal and state funds. While funding for NCC has not yet been secured and cannot be guaranteed in the short term, its completion by 2042 is reasonably foreseeable.

The following changes were made to page 3.13-59 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-28: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the segment of Roselle Avenue between the Claribel Road intersection and NCC. (Significant and Unavoidable)**

The addition of trips generated by the Project would create LOS F conditions on the two-lane section of Roselle Avenue between the Claribel Road intersection and NCC. Because LOS F exceeds the minimum LOS D standard, this is a potentially significant impact.

Improving the LOS in this area would require improving Roselle Avenue to a four-lane arterial standard. This work is not included in the City's traffic impact fee program. A

portion of Roselle Road in thisThe area is within the limits of the NCC project area and is included in Modesto's CFF, and the project may contribute to this work through Regional Impact Fees. However, RTIF fees are only one source of funds for the NCC, and federal and state funds will need to be acquired.

Because no mechanism exists for the Project to contribute to the cost of improvements in the City of Modesto, and because the City of Riverbank does not control the RTIF or Modesto CFF program, there is no guarantee that the City of Modesto would allocate CFF funds to this improvement. Because installation cannot be assured by the City of Riverbank, the Project's impact is **significant and unavoidable**.

These revisions do not identify new significant environmental impacts, nor do the revisions result in substantive changes to the Draft EIR. The new information to the Draft EIR is intended to merely clarify the information.

**Response J-8:** The commenter states "In various cases under impacts in Section 3.13, the RTIF is cited under projects which are not included in the RTIF program which misrepresents each impact as being funded by the RTIF. In Section 3.13, the DEIR identifies several significant impacts to roadways, but incorrectly states that the RTIF will fund projects that will mitigate these impacts. However, the projects identified are not funded by the RTIF, therefore the proposed mitigation measures are ineffective. The DEIR should include mitigation measures that require the Project to pay its fair share of improvements for roadway impacts that incorrectly assume RTIF participation."

This comment, similar to J-7, addresses the RTIF fees, and the need to pay a fair share of the traffic improvements. The response under J-7 adequately addresses this comment.

**Response J-9:** The commenter states "The proposed locally preferred alternative 1-B of the North County Corridor Project should be considered in the site plan effort of the Crossroads West Specific Plan. Project development in the southern most proposed Mixed Use (MU-1) zone should be set-back and reserved for the future Claribel Road realignment such that it does not unduly burden the development of the North County Corridor. The preferred alignment is currently undeveloped agricultural land and any changes to the land use on the realignment of Claribel Road will also impact the proposed N-S Collector and should be considered and accounted for in the Traffic and Circulation section of the DEIR."

This comment is noted. It is noted that the alignment diagrams for the North County Corridor project are preliminary and the project is not yet completely funded or approved. City will continue to process projects within the Specific Plan area consistent with the Specific Plan. However, if the funding is in place and a final route is adopted by the County and the City, the City will thereafter continue to process projects within the Specific Plan area with an effort to minimize interference with the City approved North County Corridor final alignment. To the extent that the North County Corridor construction results in the need for realignment of existing roadways, right-of-way will

likely need to be acquired by the implementing agency. The City of Riverbank will work with Stanislaus County to reserve sufficient right-of-way for the new Claribel Road alignment, if needed, but cannot require dedication of right-of-way as this might be considered a taking of land for public purposes in excess of what is reasonably required.

**Response J-10:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.

**Response J-11:** Subsequent to the original August 7, 2017 letter from this commenter, additional clarifying comments were provided. The commenter states “City of Riverbank does not control the RTIF.” The commenter further states that “This statement is used in unrelated impacts to the RTIF program. It is generally followed up by “The area is within the limits of the NCC project area”, but the NCC is not necessarily going to mitigate these locations as described. Specifically, the cumulative scenario does not include the segments immediately south of the NCC between NCC and Claratina.”

As noted in Response J-7, the Draft EIR notes that the footprint of the NCC included portions of some streets where significant traffic impacts were identified. As such, a portion of the needed mitigation would theoretically be included in the NCC. This potential partial mitigation is, however, subject to funding availability. The revision shown in Response J-7 clarifies this point. As noted in the above revisions, the RTIF is only one of several sources of funds that will be needed to construct the NCC, including federal and state funds. The City of Riverbank does not have jurisdiction over the use of RTIF funds.

**Response J-12:** The commenter states “The RTIF does not currently have sufficient funds to construct the NCC to mitigate the immediate and direct impacts of the proposed project. The DEIR is assuming that the direct impacts of the project only will be mitigated by a future project that is not fully funded. The project should contribute for its fair share of offsite impacts. For instance, Impact 3.13-15 recognizes there are considerable interim impacts to the intersection of Kiernan/Claribel/McHenry, but considers the NCC as the mitigation. The timing of the required improvements should be such that they are constructed along with the proposed project, not waiting for the build out of an extremely large regional project that will take years to construct.

As noted previously (see Responses J-7 and J-11), the RTIF is one of several sources of funds, including state and federal funds, that will be needed to construct the NCC. The Draft EIR concludes that the City cannot guarantee when the NCC will be built.

With regards to the Kiernan Avenue / Claribel Road / McHenry Blvd intersection, absent the NCC project, a second westbound left turn lane could be installed at this intersection to deliver LOS D under Existing Plus Approved Project and CWSP conditions. The Draft EIR and associated traffic study have been revised to clarify this point. Revisions to the Draft EIR are identified with Chapter 3.0, Errata, with revision marks

(underline for new text, strike out for deleted text). The following changes were made to pages 3.13-46 and 3.13-47 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-15: Under EPAP conditions, the proposed Project would result in a significant impact at the McHenry Avenue / Kiernan Avenue / Claribel Avenue intersection. (Significant and Unavoidable)**

Under the EPAP Plus Project conditions, the McHenry Avenue / Kiernan Avenue / Claribel Avenue intersection would operate at LOS E. Based on the change to an unacceptable LOS, this is a potentially significant impact.

Improving the LOS at this intersection would require additional intersection capacity, and the NCC project includes improvements to this location. Absent the NCC, a second westbound left turn lane on Claribel Avenue would yield LOS D, which would satisfy the minimum LOS D requirement. However, while the CWSP could theoretically contribute its fair share to the cost of this improvement, there is no mechanism in place to collect the balance of the funds needed for this improvement. The NCC is included in the County's RTIF, although NCC funds are only one source of the overall funding needed to complete the NCC. As with any regional improvement, short term impacts may occur during the period prior to completion of the NCC. However, because the City of Riverbank does not control the Regional Fee program, funding for the NCC is not secure and funding for other alternative intersection improvement has not been identified, there is no guarantee that the NCC or other improvements will be constructed in time to mitigate the project impact. The Project applicant would be required to pay the fair share fee towards the NCC project. Because installation cannot be assured by the City of Riverbank, this impact would be **significant and unavoidable.**

MITIGATION MEASURE(S)

***Mitigation Measure 3.13-13:*** *Prior to issuance of Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Connector in order to satisfy their fair share obligation.*

These revisions do not identify new significant environmental impacts, nor do the revisions result in substantive changes to the Draft EIR. The new information to the Draft EIR is intended to merely clarify the information.

**Response J-13:** The commenter states "The following impacts only consider the segments between Claribel Rd and NCC, while ignoring south of the NCC. As such, they also assume that RTIF will make the necessary improvements, however, the proposed project's land use was not considered in the development of the NCC." The commenter indicates that under Impact 3.13-27, Oakdale Rd Impact is stated between Claribel Rd and NCC (In the city of Modesto), which today is not inside the City only in their Sphere, and does not include the segments south the NCC to Claratina. The commenter also indicates that under Impact 3.13-28 Roselle Ave Impact is stated between Claribel Rd and NCC (In the city of Modesto), which today is not inside the City only in their Sphere, and does not

include the segments south the NCC to Claratina. The commenter states that “There should be a mitigation measure to address widening of Roselle at minimum from Claribel to NCC.”

The land use assumptions made as part of the development of the NCC by Stanislaus County, the Stanislaus Council of Governments (StanCOG), and Caltrans were intended to reflect a forecast for possible development occurring by 2042. As noted on pages 3.13-47 and 3.13-48 of the Draft EIR, these assumptions do not result in General Plan Build out within any jurisdiction, including Riverbank. Long term traffic volume forecasts at study locations were drawn from the NCC EIR but were adjusted to reflect build out of the CWSP.

In regard to Impact 3.13-27 (pages 3.13-58 and 3.13-59 of the Draft EIR), the segment of Oakdale Road south of NCC to Claratina Road is included in the City of Modesto CFF program and a six-lane facility is planned. The Draft EIR assumes that completion of CFF improvements south of NCC is reasonably certain by 2042.

In regard to Impact 3.13-28 (page 3.13-59 of the Draft EIR), the segment of Roselle Road south of Claribel Road to NCC would need to be a four-lane facility to mitigate cumulative impacts. This work is included in the City of Modesto CFF program, and the NCC footprint includes a portion of this roadway. The Draft EIR concludes that completion of CFF improvements north of NCC cannot be guaranteed, and that the impact is significant and unavoidable.

**Response J-14:** The commenter indicates that Mitigation Measure 3.13-16 (Impact 3.13-20) requires a second northbound left turn lane at Claribel/Oakdale Rd as determined by the City of Riverbank Engineer, but states that this approach is outside of the City’s jurisdiction and should therefore be “as determined by the Stanislaus County Road Commissioner”.

The Draft EIR text has been revised to reflect determination by the Stanislaus County Road Commissioner. Revisions to the Draft EIR are identified with Chapter 3.0, Errata, with revision marks (underline for new text, strike out for deleted text). The following changes were made to pages 3.13-53 and 3.13-54 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-20: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Claribel Road / Oakdale Road intersection. (Significant and Unavoidable)**

With development of the Project, the Claribel Road / Oakdale Road intersection will operate at LOS E. Based on the change from acceptable to unacceptable LOS, this is a potentially significant impact.

Improving the LOS would require adding a second northbound left turn lane on Oakdale Road and reorienting the four-lane westbound approach to provide dual

left turns, a through lane, and a separate right turn lane. Improving the Oakdale Road / Claribel Road intersection is not in the Riverbank impact fee program, but the intersection is within the project area of the NCC. The second northbound left turn lane has not been included in the NCC project as described in the Draft EIR. With the aforementioned improvements, and contributing to the cost of the NCC by paying regional fees to cover other intersection costs, the City's minimum LOS standard would be met. However, because the City of Riverbank does not control the NCC Project, nor the regional fee program, there is no guarantee that the improvement will be installed. Therefore, this impact would remain **significant and unavoidable**.

MITIGATION MEASURE(S)

**Mitigation Measure 3.13-16:** *Prior to approval of a Final Map or improvement plans, each applicant in the Plan Area shall be responsible for the project's fair share impacts towards the cost of adding a second northbound left turn lane at the Claribel Road / Oakdale Road intersection, as determined by the City of Riverbank City Engineer. When warranted, the addition of a second northbound left turn lane shall be required, to the satisfaction of the ~~City of Riverbank City Engineer~~ Stanislaus County Road Commissioner. When warranted, this roadway improvement shall be noted on the improvement plans for such project.*

This revision does not identify new significant environmental impacts, nor does the revision result in substantive changes to the Draft EIR. The new information to the Draft EIR is intended to merely clarify the information.

**Response J-15:** The commenter states "The County would not take issue with the project mitigating it's impacts outside it's jurisdictional boundary and therefore where the DEIR has suggested that these impacts cannot be guaranteed outside of the City of Riverbank, the County could enter into an agreement for improvements on County roads that are directly impacted by the project. For instance, Mitigation Measure 3.13-2 includes partial mitigation on a segment outside of the City of Riverbank, but inside the County and the City of Modesto Sphere, this language and these types of mitigations can be included for the projects immediate and direct impacts."

This comment is noted. No further response is necessary.



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH



KEN ALEY  
DIRECTOR

August 2, 2018

John B. Anderson  
City of Riverbank  
6706 3rd Street, South Hall  
Riverbank, CA 95367

Subject: Crossroads West Specific Plan  
SCH#: 2017032062

Dear John B. Anderson:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 1, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

K-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044  
1-916-322-2318 FAX 1-916-958-3184 www.oprc.ca.gov

**Document Details Report  
State Clearinghouse Data Base**

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

**Type** EIR Draft EIR  
**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** 6706 3rd Street, South Hall  
**City** Riverbank **State** CA **Zip** 95367

**Project Location**

**County** Stanislaus  
**City** Riverbank  
**Region**  
**Lat / Long**  
**Cross Streets** Claribel Road/Oakdale Road  
**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** 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; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 10; Office of Emergency Services, California; Department of Housing and Community Development; Regional Water Quality Control Bd., Region 5 (Sacramento); Air Resources Board, Transportation Projects; Delta Protection Commission; Delta Stewardship Council; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

**Date Received** 06/18/2018 **Start of Review** 06/18/2018 **End of Review** 08/01/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

**Response to Letter K:**      **Scott Morgan, State of California Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit**

**Response K-1:**      The comment acknowledges that the City has complied with the State Clearinghouse review requirements, pursuant to CEQA. No further response is necessary.



**SYLVAN UNION SCHOOL DISTRICT**

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

www.sylvan.k12.ca.us

July 30, 2018

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

John B. Anderson, Project Planner  
City of Riverbank, Development Services Department  
6707 3<sup>rd</sup> Street  
Riverbank, CA 95367

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Re: Response to Notice of Draft Environmental Impact Report

Dear Mr. Anderson:

Thank you for the Notice of Availability of the Crossroads West Specific Plan Draft Environmental Impact Report.

As identified in the report, the Sylvan Union School District will serve the Crossroads West area for grades TK-8<sup>th</sup> grade. There are potentially significant impacts to the Sylvan Union School District.

Pages 2.0-7 & 8 provides the average expected densities, and at full build out it is expected we will need to provide services to an additional 524 new elementary students and 327 new middle school students.

	Units	Rate	Elementary	Units	Rate	Middle
Low Density Residential	1,921	0.28	476	1,521	0.15	228
Medium Density Residential	144	0.28	40	144	0.15	22
High Density Residential	310	0.083	26	310	0.111	34
Mixed Use	388	0.083	32	388	0.111	43
<b>Total Units</b>	<b>2,963</b>					
<b>Total Potential Students</b>			<b>524</b>			<b>327</b>

L-1

For comparison purposes, the existing Crossroads East Specific Plan identified an average of 2,294 household units when it was planned. We are currently collecting taxes on 1,847 units. The existing units have generated approximately 850 elementary students, and approximately 525 middle school students, all located in Riverbank.

The district currently serves 499 middle school students with Riverbank addresses and bus the students to Ustach Middle School in Modesto. When combining the current middle school students (499) with the expected 327 new students illustrates the need to build both a middle school and an elementary school. **A middle school will be the district's first priority with 20 acres required to build a middle school.**

Throughout the Draft EIR there are numerous references to potential school sites, correctly identifying the required acreage. Figure 2.0-8 Conceptual Land Use Plan

L-2

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

identifies a school site that is centrally located, and is a preferred location as previously communicated in our letter of April 11, 2017 (attached). However, the second school site is not centrally located and is contrary to the plans assertions that schools will be planned to accommodate the concept of a "neighborhood school" (walking distance).

The City of Riverbank General Plan Goal for the Air Quality Element AIR 1.4 states schools shall be located, designed, and the surrounding area planned to ensure that students can safely and conveniently walk or bicycle to school from their homes." In addition, Public Services and Facilities Element Public 9-1 through 9-5 specify guidelines to ensure "school sites are designed to allow easy pedestrian and bicycle access from surrounding neighborhoods."

L-2  
cont'd

Page 3.12-20 indicates that new students generated by the Crossroads West Specific Plan will attend Crossroads Elementary School and Elizabeth Ustach Middle School. This will not be possible because both schools are currently exceeding capacity. The district will need to develop a bussing plan to accommodate new students generated to existing schools throughout the entire district until a new school can be built. This will be a burden for both the district and families. Instead early planning for financing and building new schools to stay ahead of new growth is necessary.

L-3

Page 3.12-21 references the need to address environmental concerns related to current and past agricultural operations, specifically referencing Mitigation Measure 3.8-1. If mitigation measures are necessary to accommodate centrally located schools as specified by the City of Riverbank's General Plan, the district respectfully requests that all mitigation efforts are planned and agreed to prior to annexation of the property into the City of Riverbank.

L-4

In summary:

1. We agree with the placement of a new school near Crawford Road as identified on Figure 2.0-8. Twenty (20) acres will be required to build a middle school at this location.
2. We disagree with the placement of a second school located near Morrill Road identified on Figure 2.0-8. Ten (10) acres will be needed. (See April 11, 2017 correspondence and attached school site preferences).
3. The placement of the schools should be centrally located to support the concept of a neighborhood school within walking distance from home to school.
4. Establish suitable and safe school bus stops, and paths of travel for students that may walk and bicycle to school.
5. Establish safe crossing routes for students that will cross Oakdale Road to attend a centrally located middle school.
6. Work cooperatively with both the Sylvan Union School District and Modesto City High School District to develop a finding plan to build schools and to ensure mutually acceptable solutions to expected impacts including mitigation of all environmental concerns.
7. Mitigation of all environmental concerns related to current and past agricultural operations.

L-5

Thank you for the opportunity to provide comments to the Draft EIR. Please contact me or Yvonne Perez, Assistant Superintendent of Business Services with any questions.

L-6

Sincerely,

  
Debra Hendricks, Superintendent

Copies to: Sylvan Union School District Board of Trustees

*An Equal Opportunity Employer*



## SYLVAN UNION SCHOOL DISTRICT

805 SYLVAN AVENUE + MODESTO, CA 95350 + (209) 574-5000 + FAX: (209) 534-2872

[www.sylvan.k12.ca.us](http://www.sylvan.k12.ca.us)

April 11, 2017

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

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

### BOARD OF TRUSTEES

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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-5<sup>th</sup> 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, learner-based education that prepares each child to be a contributing member of society.



**Response to Letter L: Debra Hendricks, Sylvan Union School District**

**Response L-1:** The commenter summarizes the number of students generated by the proposed CWSP and the Crossroads East Specific Plan. The commenter also notes that proposed project will require the construction of a middle and elementary school, and that the development of a 20-acre a middle school will be the District’s first priority.

These comments are noted, and are reflected in the proposed CWSP. As noted on page 2.0-5 of Chapter 2.0, Project Description, of the Draft EIR, the Plan accommodates the possibility for a future 10 to 12-acre elementary school as well as a 20-acre middle school within the Plan Area. Ultimately, any development of a school on these sites is a discretionary action by the School District. The City and the Project applicants will work with the District relative to the development of future schools in the Plan Area.

**Response L-2:** The commenter notes that the first school site is centrally located and is a preferred location as communicated by the School District in a previous letter. The commenter also notes that the second school site is not centrally located and is contrary to the Plan’s assertion that schools will be planned to accommodate the concept of a “neighborhood school”.

This comment is noted. The exact school locations shown in the Draft EIR are conceptual and are subject to the School District accepting the site for future development of a school facility. As shown in footnote three of Figure 2.0-8 in Chapter 2.0 of the Draft EIR, the school locations are a placeholder within the Low Density Residential (LDR) designation. The ultimate location of the school site would be determined by the District in coordination with the City and applicant/property owners. A school facility within the LDR land use is a compatible use with the residences that would be constructed in this land use.

**Response L-3:** The commenter indicates that students generated by the proposed project will not be able to attend Crossroads Elementary School and Elizabeth Ustach Middle School because of the lack of capacity. Instead, the commenter indicates that new students will need to be bussed to existing schools throughout the entire district until a new school is developed. The commenter indicates that a bussing plan should be developed to ensure that the new students are accommodated. The commenter also indicates that early planning for financing and building new schools is necessary to stay ahead of the anticipated growth.

This comment is noted. The CWSP includes school sites, which is a reflection of early plans to accommodate new schools for the new students generated by the growth. The City and applicant will continue to work with the School District to refine and solidify plans for new schools within the Plan Area. The financing of school facilities is beyond the scope of a CEQA document, but it is noted that the applicant is subject to SB 50 school impact fees which are intended to pay for new school facilities. The City requires all new development to pay mandatory school impact fees.

**Response L-4:** The commenter references Mitigation Measure 3.8-1 and requests that, “If mitigation measures are necessary to accommodate a centrally located schools as specified by the City of Riverbank’s General Plan, the district respectfully requests that all mitigation efforts are planned and agreed to prior to annexation of the property into the City of Riverbank.”

This comment is noted. All mitigation measures presented in the EIR will become a commitment of the project. A Mitigation Monitoring and Reporting Program is included in this Final EIR (Section 4.0), which outlines the timing of implementation.

**Response L-5:** The comment summarizes the points made in the previous portions of the comment letter. See Responses L-1 through L-4 for specific responses to each concerns and requests.

**Response L-6:** This comment serves as a conclusion to the comment letter and does not warrant a response. No further response is necessary.

This section includes minor edits and changes to the Draft EIR. These modifications resulted from responses to comments received during the public review period for the Draft EIR, as well as City staff-initiated edits to clarify language.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, nor do they alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5.

Other minor changes to various sections of the Draft EIR are also shown below. These changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.

### 3.1 REVISIONS TO THE DRAFT EIR

#### TOC TABLE OF CONTENTS

No changes were made to Chapter TOC of the Draft EIR.

#### ES EXECUTIVE SUMMARY

No changes were made to Chapter ES of the Draft EIR.

#### 1.0 INTRODUCTION

No changes were made to Chapter 1.0 of the Draft EIR.

#### 2.0 PROJECT DESCRIPTION

The following changes were made to page 2.0-5 of Chapter 2.0 of the Draft EIR:

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 approximately 22 acres. The plan accommodates the possibility for a future 10 to 12-acre elementary school, ~~as well as a possible future 20 acre middle school,~~ and a possible future location for a one- to two-acre west Riverbank fire station within the Plan Area. The proposed Project would provide approximately 42 acres of park, open space, and Regional Sports Park uses.

The following changes were made to page 2.0-6 of Chapter 2.0 of the Draft EIR:

The Project also includes a request for approval of General Plan Amendments, Specific Plan, pre-zoning, ~~and~~ annexation of the entire Project site, Development Agreements, Tentative Parcel Maps, and Conditions of Approval for the MU-1 area. The developers of the MU-1 “Mixed Use” area have concurrently filed an application for a Development Agreement, Tentative Map and Preliminary Development Plan to be considered as part of the approval action. The proposed land use designations are shown in Figures 2.0-7a and 2.0-7b, respectively. 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 2.0-8 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 fire station site to be located near the corner of Crawford and Oakdale Road.

The land use plan as proposed suggests 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. The total number of allowed residential units for the entire project cannot exceed the average density assumptions described below. 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.

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. The largest concentration of retail development will be located at the southern end of the Plan Area at the intersection of Oakdale Road and Claribel Road and is identified as MU-1 property. The MU-1 property consists of approximately 54+/- acres of land intended for mixed use development, including without limitation which as provided in the CWSP may include commercial, retail, office, hospitality, entertainment, recreation, residential, restaurants, neighborhood and regional commercial and/or other uses permitted within the MU-1 designation. (See CWSP, Table 2.0-3.) Under the CWSP, the MU-1 property is designed to provide flexibility to allow: (i) the MU-1 property to be developed as a phased development in phases; (ii) residents, occupants, and future tenants of the MU-1 property to be integrated within a regional and/or neighborhood commercial center and/or other MU-1 uses permitted under the CWSP so that the development remains viable as market conditions may change throughout the proposed 19-year buildout period; (iii) for potential

future and/or additional retail and/or other permitted uses at the MU-1 Property going forward; and (iviii) the development of the best possible project at the MU-1 property for long-term implementation of the CWSP. At maximum development intensity, the buildout of the 54-acre MU-1 property could reach an average commercial FAR of 0.35, resulting in approximately 550,000 sf of commercial MU-1 development. Alternatively, at maximum development intensity, subareas within the MU-1 property could be developed with up to approximately 350 residential dwelling units and up to 360,000 sf of commercial MU-1 development, although subareas of commercial development could have individually higher FARs, and if residential development is horizontally or vertically integrated into a commercial area, the area of residential development will not be calculated into the Commercial FAR. If residential development is vertically integrated into a commercial area, such residential development would not be calculated into the retail/commercial FAR. This Draft EIR evaluates the MU-1 Property at maximum development intensity of 550,000 square feet of retail/commercial to provide a reasonably conservative assessment of the environmental effects of development of the MU-1 Property. In addition, the EIR's traffic impact analysis evaluates an alternative scenario where up to 350 residential dwelling units could be constructed through horizontal or vertical integration in small development subareas at low-, medium-, or high-density intensities and up to 360,000 square feet of retail/commercial development occur at the MU-1 Property.

The following changes were made to page 2.0-7 of Chapter 2.0 of the Draft EIR:

Project buildout would be implemented in phases, based on future market conditions over an ~~approximate~~estimated 19-year period, through a series of future tract and parcel maps. The phasing plan identified in Chapter 9 of the CWSP will ensure timely completion of public facilities and improvements that coincide with each development. The phasing plan will also ensure that each phase of development has the infrastructure necessary to meet the demands of new construction. At this time, it is anticipated that the regional MU-1 property will develop first followed by various areas of residential and MU-2, which are located north of MID Lateral No. 6. This phasing represents only ~~today's~~the City's best estimate as to how the CWSP could be ~~phased developed~~ and should not be construed as a final phasing plan. ~~Project, as project~~ development would be influenced by several factors, including general economic conditions, demographics, occupancy rates, construction schedule, construction costs, the emergence of other competitive projects, and possible changes in the regional infrastructure and public facilities, including the possibility of the North County Corridor (NCC) Project<sup>1</sup>, which is being administered by Stanislaus County.

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<sup>1</sup> The North County Corridor Project (McHenry Ave easterly to SR-120) is a high-priority project for Stanislaus County, its communities and the growing urbanized cities of Modesto, Oakdale, and Riverbank. The purpose of the project is to ultimately build a west-east roadway that would improve regional network circulation, relieve existing traffic congestion, reduce traffic delay, accommodate future traffic, benefit commerce and enhance safety. Funding for the project is being provided by regional transportation impact fees and the state funding that was once part of the cancelled state Oakdale Bypass project. (See <http://www.dot.ca.gov/d10/x-project-sr108northcountycorridor.html>)

These phases have been designed, to the extent feasible, for independent utility and development. Project conditions of approval, applicable MMRP requirements, development agreement, and tentative maps for development of the MU-1 area, in conjunction with this Specific Plan, are included and the impacts relevant thereto are analyzed in this EIR. At the time of development for each phase the City will develop conditions of approval to identify the infrastructure required, and determine which mitigation measures apply to that phase of the project, and to what extent.

Table 2.0-3 provides a summary of the land uses proposed for the CWSP. ~~In addition to~~ ~~Since the proposed residential portion of the CWSP would not likely buildout to the~~ maximum allowed densities, this EIR assumes average densities are achieved; for example, 6.5 du/ac for the LDR areas (1,521 units), 12 du/ac for the MDR areas (144 units), 20 du/ac for the HDR areas (310 units), up to 350 units for the MU-1 area and up to 38 units for the MU-2 area. If additional residential units are proposed above the assumed average density discussed, such modification would require that an amendment be approved by the City. Such amendment would require a modification to this environmental document.

### 3.1 AESTHETICS AND VISUAL RESOURCES

No changes were made to Chapter 3.1 of the Draft EIR.

### 3.2 AGRICULTURAL RESOURCES

No changes were made to Chapter 3.2 of the Draft EIR.

### 3.3 AIR QUALITY

No changes were made to Chapter 3.3 of the Draft EIR.

### 3.4 BIOLOGICAL RESOURCES

The following changes were made to pages 3.4-25 and 3.4-26 of Chapter 3.4 of the Draft EIR:

***Mitigation Measure 3.4-4:*** *The project proponent shall implement the following measures to avoid or minimize impacts on Swainson's hawk:*

- *No more than 30 days before the commencement of construction, a qualified biologist shall perform preconstruction surveys for nesting Swainson's hawk and other raptors during the nesting season (February 1 through August 31).*
- *Appropriate buffers shall be established and maintained around active nest sites during construction activities to avoid nest failure as a result of project activities. The appropriate size and shape of the buffers shall be determined by a qualified biologist, in coordination with CDFW, and may vary depending on the nest location, nest stage, and construction activity. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. Monitoring shall be conducted to confirm that project activity is not resulting in*

*detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.*

- *Before the commencement of construction, the project proponent shall provide compensatory mitigation for the permanent loss of Swainson's hawk foraging habitat. Mitigation shall be at the CDFW specified ratios, which are based on distance to nests. The Plan Area's distance to the closest nest currently falls within the range of "within 5 miles of an active nest tree but greater than 1 mile from the nest tree." As such, the Project shall currently be responsible for 0.75 acres of each acre of urban development authorized (0-75:1 ratio). The project proponent shall either provide lands protected through fee title acquisition or conservation easement (acceptable to the CDFW) on agricultural lands or other suitable habitats which provide foraging habitat for Swainson's hawk.*

The following change was made to page 3.4-29 of Chapter 3.4 of the Draft EIR:

***Mitigation Measure 3.4-7:*** *If construction activities would disturb a ditch/canal/basin within the Plan Area, the property owner/applicant proposing the activity shall verify ~~with~~ that the facility qualifies under the agricultural ditch exemption. If the facilities do not qualify for the exemption and are determined to be jurisdictional by the regulatory agencies, any fill activity would require authorization for fill from the regulatory agencies (USACE-404 permit, RWQCB-401 certification, 1600 Streambed Alteration Agreement). All requirements of a permit shall be adhered to throughout the construction phase.*

### 3.5 CULTURAL AND TRIBAL RESOURCES

No changes were made to Chapter 3.5 of the Draft EIR.

### 3.6 GEOLOGY AND SOILS

No changes were made to Chapter 3.6 of the Draft EIR.

### 3.7 GREENHOUSE GASES AND CLIMATE CHANGE

No changes were made to Chapter 3.7 of the Draft EIR.

### 3.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Chapter 3.8 of the Draft EIR.

### 3.9 HYDROLOGY AND WATER QUALITY

No changes were made to Chapter 3.9 of the Draft EIR.

### 3.10 LAND USE, POPULATION, AND HOUSING

No changes were made to Chapter 3.10 of the Draft EIR.

### 3.11 NOISE

No changes were made to Chapter 3.11 of the Draft EIR.

### 3.12 PUBLIC SERVICES AND RECREATION

The following change was made to page 3.12-21 of Chapter 2.0 of the Draft EIR:

It is noted, however, that development of ~~school facilities~~ ~~a fire station~~ within the proposed Plan Area would contribute to significant and unavoidable impacts related to aesthetics (Impacts 3.1-1 and 4.2), agricultural resources (Impacts 3.2-1 and 4.4), air quality (Impacts 3.3-1, 3.3-2, and 4.5), greenhouse gases (Impacts 3.7-1, 3.7-2, and 4.9), noise (Impacts 3.11-3 and 4.17), and transportation and circulation (Impacts 3.13-1, 3.13-2, 3.13-5, 3.13-6, 3.13-7, 3.13-8, 3.13-10, 3.13-15, 3.13-16, 3.13-17, 3.13-18, 3.13-20, 3.13-22, 3.13-23, 3.13-24, 3.13-25, 3.13-26, 3.13-27, 3.13-28, 4.17, 4.19, 4.20, 4.21, 4.23, 4.25, 4.26, 4.27, 4.28, 4.29, 4.30, and 4.31). Therefore, consistent with the analysis included in this Draft EIR, impacts related to constructing new school facilities to serve the proposed Project are considered **significant and unavoidable**.

### 3.13 TRANSPORTATION AND CIRCULATION

The following change was made to page 3.13-1 of Chapter 3.13 of the Draft EIR:

#### STUDY AREA ROADWAYS AND INTERSECTIONS

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Two major streets front the Plan Area:

**Claribel Road** is a major east-west arterial that extends easterly from an intersection on McHenry Avenue (SR 108) past the Plan Area along the south side of Riverbank into rural Stanislaus County beyond Oakdale-Waterford Highway. The Stanislaus County General Plan Circulation Element identified Claribel Road as a Minor Arterial in the areas that are not within the future NCC alignment. Claribel Road is designated an Arterial in the Riverbank General Plan Circulation Element. Claribel Road is currently a four-lane facility from McHenry Avenue to Oakdale Road, but between Oakdale Road and Squire Wells Way, the north side has been widened to its ultimate four-lane width. The posted speed limit is 45 miles per hour (mph).

The following change was made to page 3.13-3 of Chapter 3.13 of the Draft EIR:

**Future North County Corridor (NCC).** Future plans for regional circulation in this area of Stanislaus County involve the development of bypass routes to reduce traffic on existing state routes and other major facilities. The NCC Expressway is expected to link SR 99 in northern Modesto with SR 120/108 east of Oakdale. The NCC is identified in the Riverbank General Plan Element, Stanislaus County General Plan Circulation Element, and the NCC's EIR for this two-lane / six-lane facility was available for public review as the CWSP traffic study was being prepared. The alignment of NCC has not been adopted. NCC alternative

alignments all make use of a similar route across the southern Riverbank – Northern Modesto area, and four alternatives for the area east of Riverbank and east of Oakdale are being evaluated in the EIR. The NCC will become State Route 108 when completed.

The following changes were made to pages 3.13-7 and 3.13-8 of Chapter 3.13 of the Draft EIR:

### STANISLAUS COUNTY FACILITIES

Service levels for roadways in Stanislaus County are determined by comparing traffic volumes for selected roadway segments with the daily LOS capacity thresholds. These thresholds are shown in Table 3.13-3 and were developed for the Stanislaus County Circulation Element (Dowling Associates Inc., November 2005). The Stanislaus County thresholds are much lower than the City of Riverbank thresholds. This is due to the rural nature of Stanislaus County roadways. Rural roadway capacities are based on different characteristics than urban roadways, such as amount of time spent following another vehicle.

**TABLE 3.13-3: STANISLAUS COUNTY ROADWAY SEGMENTS – LOS CRITERIA**

FACILITY TYPE	MAXIMUM DAILY VOLUME				
	LOS A	LOS B	LOS C	LOS D	LOS E
2-lane Collector – Rural Minor	700	1,900	3,400	5,900	10,000
2-lane Collector – Rural Major	700	1,900	3,400	5,900	10,000
4-lane Collector – Rural Major	5,600	9,400	13,200	15,800	20,000
2-lane Arterial	1,400	3,800	6,800	11,800	20,000
4-lane Arterial – Rural Minor	12,000	20,000	28,000	33,600	40,000
4-lane Arterial – Rural Principal	10,080	16,520	23,760	28,440	36,000
	15,000	25,000	35,000	42,000	50,000

SOURCE: TRAFFIC ANALYSIS OF STANISLAUS COUNTY CIRCULATION ELEMENT (DOWLING ASSOCIATES INC, NOVEMBER 2005); STANISLAUS COUNTY GENERAL PLAN CIRCULATION ELEMENT (AUGUST 23, 2016).

The following changes were made to pages 3.13-13 and 3.13-14 of Chapter 3.13 of the Draft EIR:

### EXISTING ROADWAY SEGMENT LOS

Current daily and peak hour traffic volumes on key roadway segments in the vicinity of the Plan Area were compared to adopted LOS thresholds. The results are presented in Table 3.13-6.

**TABLE 3.13-6: ROADWAY SEGMENT OPERATIONS – EXISTING CONDITIONS**

ROADWAY	LOCATION	CLASSIFICATION	JURISDICTION	MAX. VOL.	CURRENT VOL.	V/C	LOS
Patterson Rd (SR 108)	McHenry Ave to Coffee Rd	2-lane Arterial	Caltrans / County	20,000	<b>14,100</b>		E
	Coffee Rd to Oakdale Rd	2-lane Arterial	Caltrans / Riverbank	15,700	<b>15,600</b>		E
	Oakdale Rd to Jackson Ave	4-lane Arterial	Caltrans / Riverbank	33,400	16,700		B
Morrill Rd	Coffee Rd to Oakdale Rd	2-lane Rural	Riverbank	1,965 vph	205 vph		B
Crawford Rd	Coffee Rd to Oakdale Rd	2-lane Rural	Riverbank	1,965 vph	42 vph		A
	Oakdale Rd to Squire Wells Rd	2-lane Collector	Riverbank	12,900	4,890		C
Claribel Rd	McHenry Ave to Coffee Rd	4-lane Arterial	County	<del>40,000</del> 36,000	20,080		C
	Coffee Rd to Oakdale Rd	4-lane Arterial	Riverbank	33,400	19,720		B
	Oakdale Rd to Roselle Ave	2-lane Arterial	Riverbank	15,700	14,250		D
	Roselle Ave to Claus Rd	2-lane Arterial	Riverbank	15,700	10,930		C
Coffee Rd	Patterson Rd to Morrill Rd	2-lane Rural	Riverbank	1,965 vph	330 vph	0.68	C
	Morrill Rd to Crawford Rd	2-lane Rural	Riverbank	1,965 vph	442 vph		C
	Crawford Rd to Claribel Rd	2-lane Rural	Riverbank	1,965 vph	476 vph		C
	Claribel Rd to Claratina Ave	2-lane Arterial	Modesto	750 vph	507 vph		B
Oakdale Rd	Patterson Road to Morrill Rd	4-lane Arterial	Riverbank	33,400	13,790	1.15	B
	Morrill Rd to Crawford Rd	2-lane Arterial	Riverbank	15,700	13,620		D
	Crawford Rd to Claribel Rd	4-lane Arterial	Riverbank	33,400	17,510		B
	Claribel Rd to Claratina Ave	2-lane Arterial	Modesto	750 vph	<b>861 vph</b>		F
Roselle Ave	Claribel Rd to Claratina Ave	2-lane Arterial	Modesto	750 vph	488 vph	0.65	B

NOTES: **BOLD** INDICATES UNACCEPTABLE OPERATIONS; V/C = VOLUME-TO-CAPACITY RATIO.

SOURCE: KDANDERSON & ASSOCIATES, 2018.

While most roadways carry volumes that satisfy the applicable minimum LOS goal, three segments operate with unacceptable LOS:

- The two-lane segment of Patterson Road west of Riverbank from McHenry Avenue to Hot Springs Lane operates at LOS **F**. This exceeds Stanislaus County and City of Riverbank minimum standards. A four-lane roadway would be needed to deliver the minimum LOS. The City of Riverbank mitigation fee program includes funds for this work, but no construction in this area is currently programmed.
- In Modesto, the two-lane segment of Oakdale Road south of Claribel Road carries a directional peak hour volume (p.m. northbound) that is indicative of LOS F under the City's General Plan thresholds. A four-lane section would be needed to deliver the minimum LOS today, and this roadway is included in the City of Modesto's Capital Facilities Fees (CFF) program as a six-lane major arterial street.

The following change was made to page 3.13-24 of Chapter 3.13 of the Draft EIR:

### **Public Facilities Fee Program / Regional Traffic Impact Fee**

Development in Stanislaus County and its incorporated cities pay fees toward the cost of circulation system improvements of regional benefit through the Public Facilities Fee (PFF) program's Regional Transportation Impact Fee (RTIF). The PFF was last published in September 2017. The planned update to the Stanislaus County Public Facilities Fee have yet to be adopted. The draft regional fees project list is shown in Table 3.13-12.

The North County Corridor (NCC) is a project that is included for funding in the PFF program. However, the PFF is only one source of funds that would be needed to compete the NCC, as federal and state funds are also needed.

The following changes were made to page 3.13-27 of Chapter 3.13 of the Draft EIR:

**Intersections.** A significant Project impact is defined to occur at a signalized or un-signalized intersection if the addition of Project traffic causes either of the following:

- An intersection operating at an acceptable level (LOS D or better) to degrade to an unacceptable level (LOS E or worse).
- An increase in control delay of more than five seconds at an approach/movement at a signalized or un-signalized intersection that currently operates at an unacceptable level.

The following changes were made to page 3.13-31 of Chapter 3.13 of the Draft EIR:

**TABLE 3.13-16: ROADWAY SEGMENT OPERATIONS – EXISTING PLUS PROJECT CONDITIONS**

ROADWAY	LOCATION	CLASSIFICATION	MAX. VOL.	EXISTING			EXISTING + PROJECT			
				VOL.	V/C	LOS	VOLUME		V/C	LOS
							PROJECT ONLY	TOTAL		
Patterson Rd (SR 108)	McHenry Ave to Coffee Rd	2-lane Arterial	<del>10,000</del> 20,000	<b>14,100</b>	<del>1.41</del> 0.71	E	<b>1,350</b>	<b>15,450</b>	<del>1.55</del> 0.77	<del>F</del> E
		4-lane Arterial	36,000	--	--		15,400	0.43	B	
	Coffee Rd to Oakdale Rd	2-lane Arterial	15,700	<b>15,600</b>	0.99	E	<b>80</b>	<b>15,680</b>	<b>1.00</b>	E
	Oakdale Rd to Jackson Ave	4-lane Arterial	33,400	16,700		B	1,750	18,450	0.55	
Morrill Rd	Coffee Rd to NS Collector	2-lane Rural	1,965 vph	205 vph		B	419 vph	624 vph	0.32	D
	NS Collector to Oakdale Rd	2-lane Collector	12,900	1,770		--	3,480	5,250	0.41	C
Crawford Rd	Coffee Rd to Project	2-lane Rural	1,965 vph	42 vph		A	0 vph	42 vph	0.02	A
	NS Collector to Oakdale Rd	2-lane Collector	12,900	580		C	3,680	4,260	0.33	C
	Oakdale Rd to Squire Wells Rd	2-lane Collector	12,900	4,890		C	350	5,240	0.41	C
Claribel Rd	McHenry Ave to Coffee Rd	4-lane Arterial	<del>40,000</del> 36,000	20,080		C	<b>9,630</b>	<b>29,710</b>	<del>0.75</del> 0.83	<del>D</del> E
	Coffee Rd to NS Collector	4-lane Arterial	33,400	19,720	--	--	10,850	30,570	0.83	D
	NS Collector to Oakdale Rd	4-lane Arterial	33,400	19,720		B	5,800	25,520	0.75	C
	Oakdale Rd to Roselle Ave	2-lane Arterial	15,700	14,250		D	<b>5,525</b>	<b>19,775</b>	<b>1.26</b>	F
	Roselle Ave to Claus Rd	2-lane Arterial	15,700	10,930		C	<b>4,250</b>	<b>15,180</b>	<b>0.98</b>	E
Coffee Rd	Patterson Rd to Morrill Rd	2-lane Rural	1,965 vph	330 vph		C	140 vph	470vph	0.24	C
	Morrill Rd to Crawford Rd	2-lane Rural	1,965 vph	442 vph		C	294 vph	736 vph	0.37	D
	Crawford Rd to Claribel Rd	2-lane Rural	1,965 vph	476 vph		C	294 vph	732 vph (1)	0.37	D
	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	507 vph	0.68	B	<b>231 vph</b>	<b>738 vph</b>	<b>0.98</b>	E
4-lane Arterial		1,500 vph	--	--	--	231 vph	738 vph	0.50	A	
Oakdale Rd	Patterson Road to Morrill Rd	4-lane Arterial	33,400	13,790		B	2,620	16,405	0.49	B
		2-lane Arterial	15,700	13,620		D	<b>5,250</b>	<b>18,870</b>	<b>1.20</b>	F
	Morrill Rd to Crawford Rd	4-lane Arterial	--	--	--	--	5,075	18,870	0.56	B
		4-lane Arterial	33,400	17,510		B	9,990	27,500	0.82	C
	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	<b>861 vph</b>	<b>1.15</b>	F	<b>262 vph</b>	<b>1,123 vph</b>	<b>1.50</b>	F
	4-lane Arterial	1,500 vph	--	--	--		1,123 vph	0.75	C	
Roselle Ave	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	488 vph	0.65	B	59 vph	547 vph	0.73	C

NOTES: **BOLD** INDICATES UNACCEPTABLE OPERATIONS. (1) WITH PROJECT TRAFFIC PEAK VOLUME IS PM PEAK HOUR; V/C = VOLUME-TO-CAPACITY RATIO.

SOURCE: KDANDERSON & ASSOCIATES, 2018.

The following changes were made to pages 3.13-34 and 3.13-35 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-5: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Patterson Road from McHenry Avenue to Coffee Road. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the two-lane segments of Patterson Road from McHenry Avenue to Coffee Road would continue to operate with a LOS that exceeds the County / Caltrans minimum LOS C standard. Because conditions exceed the adopted standard with and without the Project, the significance of the Project's impact is based on the incremental change in the v/c ratio. In this case, the difference is ~~0.140-07~~, which exceeds the 0.05 increment permitted under County guidelines. This is a potentially significant impact.

Improving the LOS in this area requires widening SR 108 to four lanes. This improvement is addressed by the City of Riverbank Impact Fee program. As with any improvement implemented by a fee program, the possibility exists that short-term impacts may occur as the City of Riverbank and Caltrans assemble the funds needed to complete the widening. With implementation of the following mitigation, operations at this segment would improve. However, because improvements to this location are subject to Caltrans' approval process regarding design and installation, improvements may not be installed before the impact occurs. Because there is no guarantee regarding the timing of installation, the impact is **significant and unavoidable**.

MITIGATION MEASURE(S)

***Mitigation Measure 3.13-4:** Prior to issuance of any Building Permits for each project in the Plan Area, each project applicant shall pay the applicable City of Riverbank Impact Fee towards widening of SR 108 to four-lanes in order to satisfy their fair share obligation.*

**Impact 3.13-6: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from McHenry Avenue to Coffee Road. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the segment of Claribel Road from McHenry Avenue to Coffee Road would operate at LOS E. Because the Project will cause the minimum LOS standard to be exceeded, this impact is potentially significant.

Improving the LOS in this area would either require widening Claribel Road to six lanes from McHenry Avenue to Coffee Road, or creating additional parallel east-west capacity to reduce the volume of traffic on Claribel Road. While the Project could contribute funds as a fair share towards widening Claribel Road to six-lanes as far as Coffee Road, there is no other source of funds to complete this work. The future NCC will widen a portion of Claribel Road and will also provide parallel east-west capacity, and this improvement is included in the County's RTIF. RTIF fees are a portion of the long-term funding needed to complete the NCC, and federal and State funding is also needed. As with any regional

improvement, short-term impacts may occur during the period prior to completion of the NCC. Because the NCC is already included in the adopted RTIF program, payment of the adopted fees would mitigate the Project impact. However, because the City of Riverbank does not control the County RTIF program, and because funding to complete the NCC is uncertain, there is no guarantee that the NCC will be constructed in time to mitigate the Project impact. Even with implementation of the following mitigation, the proposed Project would have a **significant and unavoidable** impact.

#### MITIGATION MEASURE(S)

***Mitigation Measure 3.13-5:*** *Prior to issuance of any Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Corridor Connector in order to satisfy their fair share obligation.*

### **Impact 3.13-7: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from Oakdale Road to Claus Road. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the two-lane segments of Claribel Road from Oakdale Road to Claus Road would operate at LOS F with the addition of Project trips, which exceeds the City of Riverbanks' minimum LOS D standard. Because the Project will cause the minimum LOS standard to be exceeded, this is a potentially significant impact.

Improving the LOS in this area would either require widening Claribel Road to four lanes, or creating additional parallel east-west capacity to reduce the volume of traffic on Claribel Road. Widening Claribel Road is included in the City of Riverbank Impact Fee program. The NCC would provide parallel east-west capacity, and this improvement is included in the County's RTIF program. However, RTIF is only one source of NCC Funding, and state and federal funds will also be needed to complete the project. As with any regional improvement, short term impacts may occur during the period prior to completion of programmed improvements.

Because the widening Claribel Road is already included in the City of Riverbank Impact Fee program and the NCC is already included in the adopted County RTIF program, paying the adopted fees would mitigate the Project's impact. However, because the City of Riverbank does not control the Country RTIF program, and because funding for NCC is not secured, there is no guarantee that the NCC will be constructed in time to mitigate the Project impact. Even with implementation of the following mitigation, the proposed Project would have a **significant and unavoidable** impact.

#### MITIGATION MEASURE(S)

***Mitigation Measure 3.13-6.*** *Prior to issuance of Building Permits for the Project, each project applicant in the Plan Area shall pay the applicable City of Riverbank Impact Fee and County RTIF fee towards the improvement of Claribel Road from Oakdale Road to Claus Road in order to satisfy their fair share obligation.*

The following changes were made to page 3.13-37 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-10: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Oakdale Road between Claribel Road and Claratina Avenue, located in the City of Modesto. (Significant and Unavoidable)**

Under the Existing Plus Project condition, the two-lane section of Oakdale Road between Claribel Road and Claratina Avenue in the City of Modesto would operate at LOS F. Because LOS F exceeds the City of Modesto's minimum LOS D standard, and Project trips would increase the v/c ratio by more than 0.05, this is a potentially significant impact.

Improving the LOS in this area would require improving Oakdale Road to Modesto's four-lane arterial street standard. This improvement is included in the City of Modesto's CFF traffic impact fee program. However, development in the City of Riverbank does not contribute Modesto CFF fees. This area is also within the project limits of the NCC, and the limited portion of Oakdale Road within the NCC Footprint ~~Oakdale Road~~ is likely to be widened with this improvement project funded via CFF fees. Because no mechanism exists for the Project to contribute to the cost of improvements in the City of Modesto, and because the City of Riverbank does not control the RTIF or Modesto CFF program, there is no guarantee that the City of Modesto would allocate CFF funds to this improvement. As such, because installation cannot be assured by the City of Riverbank, this impact would be **significant and unavoidable**.

The following changes were made to page 3.13-38 of Chapter 3.13 of the Draft EIR:

Pedestrian and bicycle activity would occur as development in the Plan Area proceeds, and the proposed improvements are consistent with the StanCOG Non-Motorized Transportation Master Plan. The proposed alternative transportation circulation is shown in Figure 2.0-10 in Section 2.0, Project Description. The CWSP identifies the locations of Class II bike lanes on Morrill Road, Crawford Road, ~~Coffee Road~~, ~~Oakdale Road~~, and on a portion of the new N-S Collector. Class I bike trails are planned along Oakdale Road, the new N-S Collector, the MID Main Canal at the north end of the Plan Area and along MID Lateral #6 to the south. These facilities would be linked by a trail on western Morrill Road and on the N-S Collector. A Class I trail is also planned along Claribel Road. Ultimately, pedestrian facilities would be created along the frontage of future development associated with the Project. Thus, the Project does not interfere with the implementation of the planned bicycle and pedestrian system.

The following changes were made to page 3.13-43 of Chapter 3.13 of the Draft EIR:

**TABLE 3.13-20: ROADWAY SEGMENT OPERATIONS – EPAP PLUS PROJECT CONDITIONS**

ROADWAY	LOCATION	CLASSIFICATION	MAX. VOL.	EPAP			EPAP + PROJECT			
				VOL.	V/C	LOS	VOLUME		V/C	LOS
							PROJECT ONLY	TOTAL		
Patterson Rd (SR 108)	McHenry Ave to Coffee Rd	2-lane Arterial	<del>10,000</del> 20,000	<b>14,360</b>	<del>1.44</del> <b>1.00</b>	<del>F</del> <b>E</b>	<b>1,350</b>	<b>15,710</b>	<del>1.57</del> <b>1.01</b>	<del>F</del> <b>E</b>
	Coffee Rd to Oakdale Rd	2-lane Arterial	15,700	<b>15,725</b>	<b>1.00</b>	<b>E</b>	<b>80</b>	<b>15,805</b>	<b>1.01</b>	<b>E</b>
	Oakdale Rd to Jackson Ave	4-lane Arterial	33,400	16,990		B	1,750	18,740	0.56	B
Morrill Rd	Coffee Rd to NS Collector	2-lane Rural	1,965 vph	205 vph		B	419 vph	624 vph	0.32	D
	NS Collector to Oakdale Rd	2-lane Collector	12,900	1,770		--	3,480	5,250	0.41	C
Crawford Rd	Coffee Rd to Project	2-lane Collector	1,965 vph	42 vph		C	0 vph	42 vph	0.02	A
	NS Collector to Oakdale Rd	2-lane Collector	12,900	580		C	3,680	4,260	0.33	C
	Oakdale Rd to Squire Wells Rd	2-lane Collector	12,900	4,890		C	350	5,240	0.41	C
Claribel Rd	McHenry Ave to Coffee Rd	4-lane Arterial	<del>40,000</del> 36,000	20,570		C	<b>9,630</b>	<b>31,200</b>	<del>0.76</del> <b>0.83</b>	<del>D</del> <b>E</b>
	Coffee Rd to NS Collector	4-lane Arterial	33,400	20,235		B	10,850	31,085	0.83	C
	NS Collector to Oakdale Rd	4-lane Arterial	33,400	20,210		B	5,800	26,020	0.75	C
	Oakdale Rd to Roselle Ave	2-lane Arterial	15,700	<b>14,920</b>		E	<b>5,525</b>	<b>20,445</b>	<b>1.30</b>	<b>F</b>
	Roselle Ave to Claus Rd	2-lane Arterial	15,700	11,550		C	<b>4,250</b>	<b>15,800</b>	<b>1.01</b>	<b>F</b>
Coffee Rd	Patterson Rd to Morrill Rd	2-lane Rural	1,965 vph	330 vph		C	140 vph	470 vph	0.24	C
	Morrill Rd to Crawford Rd	2-lane Rural	1,965 vph	442 vph		C	294vph	736 vph	0.37	D
	Crawford Rd to Claribel Rd	2-lane Rural	1,965 vph	476 vph		C	294 ph	734 vph (1)	0.37	D
	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	512 vph	0.68	B	<b>231 vph</b>	<b>743 vph</b>	<b>0.99</b>	<b>E</b>
Oakdale Rd	Patterson Road to Morrill Rd	4-lane Arterial	33,400	13,950		B	2,620	16,570	0.49	B
	Morrill Rd to Crawford Rd	4-lane Arterial	33,400	13,840		B	5,250	19,090	0.57	B
	Crawford Rd to Claribel Rd	4-lane Arterial	33,400	17,690		B	9,990	27,680	0.83	C
	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	<b>934 vph</b>	1.2.5	<b>F</b>	<b>262 vph</b>	<b>1,196vph</b>	<b>1.59</b>	<b>F</b>
Roselle Ave	Claribel Rd to Claratina Ave	2-lane Arterial	750 vph	496 vph	0.66	B	59 vph	555 vph	0.73	C

NOTES: **BOLD** INDICATES UNACCEPTABLE OPERATIONS. (1) WITH PROJECT TRAFFIC PEAK VOLUME IS PM PEAK HOUR; V/C = VOLUME-TO-CAPACITY RATIO.

SOURCE: KDANDERSON & ASSOCIATES, 2017

The following changes were made to pages 3.13-46 and 3.13-47 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-15: Under EPAP conditions, the proposed Project would result in a significant impact at the McHenry Avenue / Kiernan Avenue / Claribel Avenue intersection. (Significant and Unavoidable)**

Under the EPAP Plus Project conditions, the McHenry Avenue / Kiernan Avenue / Claribel Avenue intersection would operate at LOS E. Based on the change to an unacceptable LOS, this is a potentially significant impact.

Improving the LOS at this intersection would require additional intersection capacity, and the NCC project includes improvements to this location. Absent the NCC, a second westbound left turn lane on Claribel Avenue would yield LOS D, which would satisfy the minimum LOS D requirement. However, while the CWSP could theoretically contribute its fair share to the cost of this improvement, there is no mechanism in place to collect the balance of the funds needed for this improvement. The NCC is included in the County's RTIF, although NCC funds are only one source of the overall funding needed to complete the NCC. As with any regional improvement, short term impacts may occur during the period prior to completion of the NCC. However, because the City of Riverbank does not control the Regional Fee program, funding for the NCC is not secure and funding for other alternative intersection improvement has not been identified, there is no guarantee that the NCC or other improvements will be constructed in time to mitigate the project impact. The Project applicant would be required to pay the fair share fee towards the NCC project. Because installation cannot be assured by the City of Riverbank, this impact would be **significant and unavoidable**.

MITIGATION MEASURE(S)

***Mitigation Measure 3.13-13:*** *Prior to issuance of Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Corridor ~~Connector~~ in order to satisfy their fair share obligation.*

The following change was made to page 3.13-49 of Chapter 3.13 of the Draft EIR:

The NCC project included the following study area improvements:

- Realignment of Claribel Road west of CWSP along a new alignment to Coffee Road, with improvements to Coffee Road between the NCC and Claribel Road.
- Realignment of Claribel Road east of Roselle Avenue over the BN&SF to a new intersection on Claus Road.

It is important to note that NCC funding will be provided by a combination of RTIF funds collected from new development, as well as federal and state funds. While funding for NCC has not yet been secured and cannot be guaranteed in the short term, its completion by 2042 is reasonably foreseeable.

The following changes were made to pages 3.13-53 and 3.13-54 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-20: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Claribel Road / Oakdale Road intersection. (Significant and Unavoidable)**

With development of the Project, the Claribel Road / Oakdale Road intersection will operate at LOS E. Based on the change from acceptable to unacceptable LOS, this is a potentially significant impact.

Improving the LOS would require adding a second northbound left turn lane on Oakdale Road and reorienting the four-lane westbound approach to provide dual left turns, a through lane, and a separate right turn lane. Improving the Oakdale Road / Claribel Road intersection is not in the Riverbank impact fee program, but the intersection is within the project area of the NCC. The second northbound left turn lane has not been included in the NCC project as described in the Draft EIR. With the aforementioned improvements, and contributing to the cost of the NCC by paying regional fees to cover other intersection costs, the City's minimum LOS standard would be met. However, because the City of Riverbank does not control the NCC Project, nor the regional fee program, there is no guarantee that the improvement will be installed. Therefore, this impact would remain **significant and unavoidable**.

**MITIGATION MEASURE(S)**

***Mitigation Measure 3.13-16:*** *Prior to approval of a Final Map or improvement plans, each applicant in the Plan Area shall be responsible for the project's fair share impacts towards the cost of adding a second northbound left turn lane at the Claribel Road / Oakdale Road intersection, as determined by the City of Riverbank City Engineer. When warranted, the addition of a second northbound left turn lane shall be required, to the satisfaction of the ~~City of Riverbank City Engineer~~ Stanislaus County Road Commissioner. When warranted, this roadway improvement shall be noted on the improvement plans for such project.*

The following changes were made to page 3.13-56 of Chapter 3.13 of the Draft EIR:

**TABLE 3.13-24: ROADWAY SEGMENT OPERATIONS – CUMULATIVE PLUS PROJECT CONDITIONS**

ROADWAY	LOCATION	CLASSIFICATION	MAX. VOL.	CUMULATIVE			CUMULATIVE + PROJECT			
				VOL.	V/C	LOS	VOLUME		V/C	LOS
							PROJECT ONLY	TOTAL		
Patterson Rd (SR 108)	McHenry Ave to Coffee Rd	4-lane Arterial	<del>40,000</del> 36,000	17,825	<del>0.45</del> 0.50	<del>B</del> C	1,375	19,200	<del>0.48</del> 0.53	<del>B</del> C
	Coffee Rd to Oakdale Rd	4-lane Arterial	33,400	18,925	0.57	B	75	19,000	0.57	B
	Oakdale Rd to Jackson Ave	4-lane Arterial	33,400	23,525	0.70	C	1,775	25,300	0.76	C
Morrill Rd	Coffee Rd to Oakdale Rd	2-lane Collector	12,900	5,325	0.41	C	3,875	9,200	0.71	D
Crawford Rd	Coffee Rd to Oakdale Rd	2-lane Collector	12,900	1,325	0.10	C	3,175	4,500	0.35	C
	Oakdale Rd to Squire Wells Rd	2-lane Collector	12,900	4,550	0.35	C	450	5,800	0.45	C
Claribel Rd (Realigned)	Coffee Rd to N-S Collector	2-lane Arterial	15,700	1,500	0.10	B	4,300	5,800	0.37	B
	N-S Collector to Oakdale Rd	4-lane Arterial	33,400	4,800	0.14	B	5,200	10,000	0.30	B
	Oakdale Rd to Roselle Ave	4-lane Arterial	33,400	5,600	0.17	B	2,400	8,000	0.24	B
	Roselle Ave to Claus Rd	2-lane Arterial	15,700	5,575	0.36	B	125	5,700	0.36	B
Coffee Rd	Patterson Rd to Morrill Rd	2-lane Rural	1,965 vph	364 vph	0.19	C	166 vph	530 vph	0.25	C
		2-lane Arterial	15,700	5,100	0.33	B	1,300	6,400	0.41	B
	Morrill Rd to Crawford Rd	2-lane Rural	1,965 vph	866 vph	0.44	D	<b>339 vph</b>	<b>1,205 vph</b>	<b>0.61</b>	<b>E</b>
		2-lane Arterial	15,700	11,050	0.70	C	3,050	14,100	0.902	D
	Crawford Rd to Claribel Rd	2-lane Rural	1,965 vph	857 vph	0.44	D	<b>573 vph</b>	<b>1,430 vph</b>	<b>0.56</b>	<b>E</b>
		2/4-lane Arterial	33,400	11,475	0.34	C(2)	5,525	17,000	0.51	B
	Claribel Rd to NCC	2-lane Rural	1,965 vph	<b>972vph</b>	<b>0.50</b>	<b>E</b>	<b>963 vph</b>	<b>1,935 vph</b>	<b>0.98</b>	<b>F</b>
		2/4-lane Arterial	33,400	7,725	0.49	B	9,275	17,000	0.51	B
NCC to Claratina Ave	6-lane Arterial	2,250 vph	801	0.36	A	219	1,020 vph	0.45	A	
Oakdale Rd	Patterson Road to Morrill Rd	4-lane Arterial	33,400	19,100	0.57	B	2,700	21,800	0.65	B
	Morrill Rd to Crawford Rd	4-lane Arterial	33,400	12,225	0.37	B	5,275	17,500	0.52	B
	Crawford Rd to Claribel Rd	4-lane Arterial	33,400	12,300	0.37	B	11,600	23,900	0.72	C
	Claribel Rd to NCC	4-lane Arterial	33,400	21,675	0.65	B	<b>13,875</b>	<b>35,500</b>	<b>1.06</b>	<b>F</b>
		6-lane Arterial	50,300	-	-	-	--	--	0.71	C
NCC to Claratina Ave	6-lane Arterial	2,250 vph	839	0.37	A	311	1,150	0.51	A	
Roselle Ave	Claribel Rd to NCC	2-lane Arterial	750 vph	627 vph	0.84	D	<b>143 vph</b>	<b>770 vph</b>	<b>1.03</b>	<b>F</b>
		4-lane Arterial	1,500 vph	--	--	--	--	--	0.52	A

NOTES: **BOLD** INDICATES UNACCEPTABLE OPERATIONS. (1) WITH PROJECT TRAFFIC PEAK VOLUME IS PM PEAK HOUR; V/C = VOLUME-TO-CAPACITY RATIO.

SOURCE: KDANDERSON & ASSOCIATES, 2017

The following changes were made to page 3.13-59 of Chapter 3.13 of the Draft EIR:

**Impact 3.13-28: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the segment of Roselle Avenue between the Claribel Road intersection and NCC. (Significant and Unavoidable)**

The addition of trips generated by the Project would create LOS F conditions on the two-lane section of Roselle Avenue between the Claribel Road intersection and NCC. Because LOS F exceeds the minimum LOS D standard, this is a potentially significant impact.

Improving the LOS in this area would require improving Roselle Avenue to a four-lane arterial standard. This work is not included in the City's traffic impact fee program. A portion of Roselle Road in thisThe area is within the limits of the NCC project area and is included in Modesto's CFF, and the project may contribute to this work through Regional Impact Fees. However, RTIF fees are only one source of funds for the NCC, and federal and state funds will need to be acquired.

Because no mechanism exists for the Project to contribute to the cost of improvements in the City of Modesto, and because the City of Riverbank does not control the RTIF or Modesto CFF program, there is no guarantee that the City of Modesto would allocate CFF funds to this improvement. Because installation cannot be assured by the City of Riverbank, the Project's impact is **significant and unavoidable**.

### 3.14 UTILITIES

No changes were made to Chapter 3.14 of the Draft EIR.

### 3.15 URBAN DECAY

No changes were made to Chapter 3.15 of the Draft EIR.

### 4.0 OTHER CEQA-REQUIRED TOPICS

No changes were made to Chapter 4.0 of the Draft EIR.

### 5.0 ALTERNATIVES TO THE PROPOSED PROJECT

No changes were made to Chapter 5.0 of the Draft EIR.

### 6.0 REPORT PREPARERS

No changes were made to Chapter 6.0 of the Draft EIR.

### 7.0 REFERENCES

No changes were made to Chapter 7.0 of the Draft EIR.

This document is the Final Mitigation Monitoring and Reporting Program (FMMRP) for the Crossroads West Specific Plan Project (Project). This FMMRP has been prepared pursuant to Section 21081.6 of the California Public Resources Code, which requires public agencies to “adopt a reporting and monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” A FMMRP is required for the proposed Project because the EIR has identified significant adverse impacts, and measures have been identified to mitigate those impacts.

The numbering of the individual mitigation measures follows the numbering sequence as found in the Draft EIR, some of which were revised after the Draft EIR were prepared. These revisions are shown in Chapter 3.0 of the Final EIR. All revisions to mitigation measures that were necessary as a result of responding to public comments and incorporating staff-initiated revisions have been incorporated into this FMMRP.

## 4.1 MITIGATION MONITORING AND REPORTING PROGRAM

The FMMRP, as outlined in the following table, describes mitigation timing, monitoring responsibilities, and compliance verification responsibility for all mitigation measures identified in this Final EIR.

The City of Riverbank will be the primary agency responsible for implementing the mitigation measures and will continue to monitor mitigation measures that are required to be implemented during the operation of the Project.

The FMMRP is presented in tabular form on the following pages. The components of the FMMRP are described briefly below:

- **Mitigation Measures:** The mitigation measures are taken from the Draft EIR in the same order that they appear in that document.
- **Mitigation Timing:** Identifies at which stage of the Project mitigation must be completed.
- **Monitoring Responsibility:** Identifies the agency that is responsible for mitigation monitoring.
- **Compliance Verification:** This is a space that is available for the monitor to date and initial when the monitoring or mitigation implementation took place.

**TABLE 4.0-1: MITIGATION MONITORING AND REPORTING PROGRAM**

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
AESTHETICS AND VISUAL RESOURCES				
Impact 3.1-3: Project implementation may result in light and glare impacts.	<b>Mitigation Measure 3.1-1:</b> A lighting plan shall be prepared for each phase of development. The lighting plan shall demonstrate that the lighting systems and other exterior lighting throughout the phase of development has been designed to minimize light spillage onto adjacent properties to the greatest extent feasible. Use of LED lighting or other proven energy efficient lighting shall be required for facilities to be dedicated to the City of Riverbank for maintenance.	City of Riverbank Development Services Department	Prior to the approval of the Site Plan review for each phase	
AGRICULTURAL RESOURCES				
Impact 3.2-1: The proposed Project has the potential to result in the conversion of Farmlands, including Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural uses.	<p><b>Mitigation Measure 3.2-1:</b> Prior to the issuance of grading permits, building permits, or final map approval on the subject residential property, the Project applicant shall secure permanent protection of offsite farmland based on a 1:1 ratio to the amount of gross Farmland converted as a result of Project development, consistent with the requirements of the City's Sustainable Agricultural Strategy. The acreage requiring agricultural mitigation shall be equal to the portion of the project site dedicated to residential uses which would be subject to the discretionary development entitlement and lands designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. Permanent preservation shall consist of the purchase of agricultural conservation easements granted in perpetuity from willing seller(s), enforceable deed restrictions, purchase of banked mitigation credits, or other conservation mechanisms acceptable to the City. Land set aside for permanent preservation shall: (1) be of equal or better soil quality, have a dependable and sustainable supply of irrigation water, and be located within Stanislaus County; and (2) not be previously encumbered by a conservation easement of any nature.</p> <p>The permanent protection of farmland shall be accomplished by either: (1) the landowner/developer working directly with an established farmland trust or similar organization, such as the Central Valley Farmland Trust, and providing certification satisfactory to the City that such lands have been permanently preserved at the specified ratio; or (2) it is the City's intent to work with a qualified land trust or similar organization, such as the Central Valley Farmland Trust, to establish a fee for agricultural land conservation easements.</p>	City of Riverbank Development Services Department	Prior to the issuance of grading permits, building permits, or final map approval on the subject residential property	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><b>Mitigation Measure 3.2-2:</b> Prior to the conversion of agricultural lands in the Plan Area, the Project applicant shall participate in the Stanislaus LAFCo's Agricultural Preservation Policy (as amended on March 25, 2015), consistent with the City's Sustainable Agricultural Strategy. The Project applicant shall prepare a "Plan for Agricultural Preservation", which shall include information such as the Project's direct and indirect impacts to agricultural resources, the availability of other lands in the City of Riverbank's existing boundaries, and relevant General Plan policies. The Plan shall also specify the method or strategy proposed to minimize the loss of agricultural lands. The information provided in the Plan shall be consistent with the environmental documentation prepared by the City.</p>	Stanislaus LAFCo	Prior to the conversion of agricultural lands in the Plan Area	
<p>Impact 3.2-3: The proposed Project has the potential to result in conflicts with adjacent agricultural lands or indirectly cause conversion of agricultural lands.</p>	<p><b>Mitigation Measure 3.2-3:</b> Prior to approval of any Final Maps, "Right to Farm" language shall be presented to the City for approval and recordation against the affected property. The proposed language shall contain the following statement: "All persons purchasing lots within the boundaries of this approved map should be prepared to accept the inconveniences associated with agricultural operations, such as noise, odors, flies, dust or fumes. Stanislaus County has determined that such inconveniences shall not be considered to be a nuisance if agricultural operations are consistent with accepted customs and standards."</p>	City of Riverbank Development Services Department	Prior to approval of any Final Maps	
AIR QUALITY				
<p>Impact 3.3-1: Project operation has the potential to conflict with or obstruct implementation of an applicable air quality plan, cause a violation of an air quality standard, or contribute substantially to an existing or projected air quality violation.</p>	<p><b>Mitigation Measure 3.3-1:</b> The Project proponent shall submit an Air Impact Assessment (AIA) application to the San Joaquin Valley Air Pollution Control District in accordance with District Rule 9510 Indirect Source Review (ISR) to obtain AIA approval from the District for the phase or Project component that is to be constructed. Prior to the issuance of a building permit of each individual phase or Project component, the Project proponent shall incorporate mitigation measures into the proposed Project and demonstrate compliance with District Rule 9510 including payment of all fees.</p> <p><b>Mitigation Measure 3.3-2:</b> Prior to the approval of improvement plans, the Project proponent shall incorporate measures that reduce vehicle emissions. The measures will be implemented through project design, conditions of approval, noticing and disclosure statements, or through the City's plan check and inspection process. This mitigation measure is intended to ensure that the best available and practical approaches are used to reduce operational emissions. Appropriate measures shall be selected by the City in</p>	<p>San Joaquin Valley Air Pollution Control District</p> <p>City of Riverbank Development Services Department</p>	<p>Prior to final approval of improvement plans for each phase</p> <p>Prior to the approval of improvement plans for each phase</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>consultation with SJVAPCD, and shall include, at a minimum, the following features into the applicable Project plans (e.g. site, engineering, landscaping, etc.):</i></p> <ul style="list-style-type: none"> <li>• <i>Provide bus turnouts and transit improvements where requested by the San Joaquin RTD.</i></li> <li>• <i>Design streets and trails to maximize pedestrian and bicycle connectivity, safety, and access to transit lines, including pedestrian and bicycle signalization, signage and safety designs at signalized intersections.</i></li> <li>• <i>Provide traffic calming measures on all streets and intersections. Traffic calming features may include marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, narrow roadways, traffic circles, on-street parking, planter strips with street trees, chicanes/chokers, or other improvements designed to reduce motor vehicle speeds and encourage pedestrian and bicycle trips.</i></li> <li>• <i>Provide street lighting along internal roadways and bike lanes/paths, sidewalks.</i></li> <li>• <i>Provide vanpool parking only spaces and preferential parking for carpools to accommodate carpools and vanpools in employment areas.</i></li> <li>• <i>Provide bicycle parking areas near the entrance of commercial establishments.</i></li> <li>• <i>Provide pedestrian signalization, signage and safety designs at signalized intersections.</i></li> <li>• <i>Require shade trees to shade sidewalks in street-side landscaping areas.</i></li> </ul> <p><b>Mitigation Measure 3.3-3:</b> <i>Prior the approval of improvement plans, the Project proponent shall prepare and implement, and/or require the implementation of, high-efficiency lighting throughout all portions of the Plan Area (for example: metal halide post top lights, or LEDs, as opposed to</i></p>	<p>City of Riverbank Development Services</p>	<p>Prior to the approval of improvement</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>typical mercury cobrahead lights).</p> <p><b>Mitigation Measure 3.3-4:</b> Prior to the approval of improvement plans, the Project proponent shall prepare and implement, and the City shall require the implementation of, the following additional mitigation measures:</p> <ul style="list-style-type: none"> <li>• Use low-VOC paint (indoor and outdoor, for both residential and non-residential uses).</li> <li>• Use only natural gas hearths (or no hearths).</li> <li>• Apply a Water Conservation Strategy to achieve reductions in outdoor water usage through installation of water-efficient irrigation systems, and landscaping with native and drought-tolerant plants that also reduce the need for gas-powered landscape maintenance equipment.</li> <li>• Require all flat roofs on non-residential structures to have a white or silver cap sheet to reduce energy demand.</li> <li>• Install low flow bathroom faucets.</li> <li>• Install low-flow kitchen faucets.</li> <li>• Install low-flow toilets.</li> <li>• Install low-flow showers.</li> <li>• Use water-efficient irrigation systems.</li> </ul>	<p>Department</p> <p>City of Riverbank Development Services Department</p>	<p>plans</p> <p>Prior to the approval of improvement plans</p>	
<p>Impact 3.3-2: Project construction has the potential to cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation.</p>	<p><b>Mitigation Measure 3.3-5:</b> To reduce construction-related emissions, the following measures shall be implemented:</p> <ul style="list-style-type: none"> <li>• Prior to year 2025, construction contracts for development in the Plan Area shall specify use of off-road construction equipment that achieves fleet average emissions equal to or less than the Tier III emissions standard of 4.8 NOx grams per horsepower-hour (g/hp-hr). The fleet average can be achieved through any combination of uncontrolled engines complying with Tier III and above engine standards. Beginning in 2025, construction contracts for development in the Plan Area shall specify use of off-road construction equipment that achieves fleet average emissions equal</li> </ul>	<p>City of Riverbank Development Services Department</p> <p>San Joaquin Valley Air Pollution Control District</p>	<p>Prior to issuance of a grading or building permit</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>to or less than the Tier IV emissions standards of NOx g/hp-hr. The fleet average can be achieved through any combination of controlled engines complying with Tier IV and above engine standards.</i></p> <ul style="list-style-type: none"> <li>• <i>Prior to issuance of a grading or building permit, the project applicant shall submit a Fugitive Dust Control Plan to SJVAPCD for review and approval. The Fugitive Dust Control Plan shall reduce emissions, during construction of PM<sub>10</sub> and PM<sub>2.5</sub> and shall include the following:</i> <ul style="list-style-type: none"> <li>○ <i>Names, addresses and phone numbers of persons responsible for the preparation, submission and implementation of the plan.</i></li> <li>○ <i>Description and location of operations.</i></li> <li>○ <i>Listing of all fugitive dust emissions sources included in the operation.</i></li> <li>○ <i>The following dust control measures shall be implemented:</i> <ul style="list-style-type: none"> <li>▪ <i>All on-site unpaved roads shall be effectively stabilized using water or chemical stabilizers that can be determined to be as efficient as or more efficient for fugitive dust control than California Air Resources Board approved soil stabilizers, and that shall not increase any other environmental impacts including loss of vegetation.</i></li> <li>▪ <i>All material excavated or graded will be sufficiently watered to prevent excessive dust. Watering will occur as needed with complete coverage of disturbed areas. The excavated soil piles will be watered as needed to limit dust emissions to less than 20 percent opacity or covered with temporary coverings.</i></li> <li>▪ <i>Construction activities that occur on unpaved surfaces will be discontinued during windy conditions when winds exceed 25 miles per hour and those activities cause visible dust plumes.</i></li> </ul> </li> </ul> </li> </ul>			

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>Construction activities may continue if dust suppression measures are used to minimize visible dust plumes.</i></p> <ul style="list-style-type: none"> <li>▪ <i>Track-out debris onto public paved roads shall not extend 50 feet or more from an active operation and track-out shall be removed or isolated such as behind a locked gate at the conclusion of each workday.</i></li> <li>▪ <i>All hauling materials should be moist while being loaded into dump trucks.</i></li> <li>▪ <i>All haul trucks hauling soil, sand and other loose material on public roads shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</i></li> <li>▪ <i>Soil loads shall be kept below 6 inches of the freeboard of the truck.</i></li> <li>▪ <i>Drop heights should be minimized when loaders dump soil into trucks.</i></li> <li>▪ <i>Gate seals should be tight on dump trucks.</i></li> <li>▪ <i>Traffic speeds on unpaved roads shall be limited to a maximum of 15 miles per hour.</i></li> <li>▪ <i>All grading activities shall be suspended when visible dust emissions exceed 20 percent.</i></li> <li>▪ <i>Other fugitive dust control measures as necessary to comply with SJVAPCD Rules and Regulations.</i></li> <li>▪ <i>Disturbed areas should be minimized.</i></li> </ul>			
BIOLOGICAL RESOURCES				
Impact 3.4-2: The potential to have direct or indirect effects on special-status reptile and	<b>Mitigation Measure 3.4-1:</b> <i>The project proponent shall implement the following measures to avoid or minimize impacts on western pond turtle:</i>	City of Riverbank Development	Prior to commencement of any	



ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>surveyed for giant garter snake. The survey shall be repeated if a lapse in construction activity of 2 weeks or greater has occurred. If a giant garter snake is encountered during construction, activities within 200 feet of the irrigation ditches shall cease until appropriate corrective measures have been completed or it is determined by the qualified biologist and City staff, in coordination with USFWS and CDFW, that the giant garter snake shall not be harmed. Any sightings shall be reported to USFWS and CDFW immediately.</p> <ul style="list-style-type: none"> <li>• A biological onsite monitor will be present during initial ground-disturbing activities within 200 feet of any irrigation ditch or potential GGS habitat within the CWSP Plan Area</li> <li>• Construction vehicles would require low-speed limits within such sites to lessen the probability that the species could be run over by vehicles and equipment.</li> <li>• Any aquatic habitat for the snake that is dewatered shall remain dry for at least 15 consecutive days after April 15 and before excavating or filling of the dewatered habitat. If complete dewatering is not possible, potential snake prey (e.g., fish and tadpoles) will be removed so that snakes and other wildlife are not attracted to the construction area.</li> <li>• Giant garter snake aquatic habitat to be avoided (i.e. irrigation ditches) within or adjacent to construction areas will be fenced and designated as environmentally sensitive areas. These areas shall be avoided by all construction personnel.</li> </ul>	<p>Qualified Biologist U.S. Fish and Wildlife Service</p>		
<p>Impact 3.4-3: The potential to have direct or indirect effects on special-status bird species.</p>	<p><b>Mitigation Measure 3.4-3:</b> The project proponent shall implement the following measure to avoid or minimize impacts on western burrowing owl:</p> <ul style="list-style-type: none"> <li>• No less than 14 days before initiating ground disturbance activities, a qualified biologist shall complete an initial take avoidance survey using the recommended methods described in the Detection Surveys section of the March 7, 2012, CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012). Implementation of avoidance and minimization measures (as presented in the March 7, 2012, CDFW Staff Report on Burrowing Owl Mitigation) would be triggered if the initial take avoidance survey results in positive owl presence in</li> </ul>	<p>City of Riverbank Development Services Department Qualified Biologist California Department of</p>	<p>No less than 14 days before initiating ground disturbance activities</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>the Plan Area where project activities shall occur. If needed, the development of avoidance and minimization approaches shall be developed in coordination with CDFW.</i></p> <p><b>Mitigation Measure 3.4-4:</b> <i>The project proponent shall implement the following measures to avoid or minimize impacts on Swainson's hawk:</i></p> <ul style="list-style-type: none"> <li>• <i>No more than 30 days before the commencement of construction, a qualified biologist shall perform preconstruction surveys for nesting Swainson's hawk and other raptors during the nesting season (February 1 through August 31).</i></li> <li>• <i>Appropriate buffers shall be established and maintained around active nest sites during construction activities to avoid nest failure as a result of project activities. The appropriate size and shape of the buffers shall be determined by a qualified biologist, in coordination with CDFW, and may vary depending on the nest location, nest stage, and construction activity. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. Monitoring shall be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.</i></li> <li>• <i>Before the commencement of construction, the project proponent shall provide compensatory mitigation for the permanent loss of Swainson's hawk foraging habitat. Mitigation shall be at the CDFW specified ratios, which are based on distance to nests. The Plan Area's distance to the closest nest currently falls within the range of "within 5 miles of an active nest tree but greater than 1 mile from the nest tree." As such, the Project shall currently be responsible for 0.75 acres of each acre of urban development authorized (0-75:1 ratio). The project proponent shall either provide lands protected through fee title acquisition or conservation easement (acceptable to the CDFW) on agricultural lands or other suitable habitats which provide foraging habitat for Swainson's hawk.</i></li> </ul> <p><b>Mitigation Measure 3.4-5:</b> <i>The project proponent shall implement the following measure to avoid or minimize impacts on other protected bird</i></p>	<p>Fish and Wildlife</p> <p>City of Riverbank Development Services Department</p> <p>Qualified Biologist</p> <p>California Department of Fish and Wildlife</p> <p>City of Riverbank Development</p>	<p>No more than 30 days before commencement of construction</p> <p>Prior to ground disturbing</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>species that may occur on the site:</i></p> <ul style="list-style-type: none"> <li><i>Preconstruction surveys for active nests of special-status birds shall be conducted by a qualified biologist in all areas of suitable habitat within 500 feet of project disturbance. Surveys shall be conducted within 14 days before commencement of any construction activities that occur during the nesting season (February 15 to August 31) in a given area.</i></li> <li><i>If any active nests, or behaviors indicating that active nests are present, are observed, appropriate buffers around the nest sites shall be determined by a qualified biologist to avoid nest failure resulting from project activities. The size of the buffer shall depend on the species, nest location, nest stage, and specific construction activities to be performed while the nest is active. The buffers may be adjusted if a qualified biologist determines it would not be likely to adversely affect the nest. If buffers are adjusted, monitoring will be conducted to confirm that project activity is not resulting in detectable adverse effects on nesting birds or their young. No project activity shall commence within the buffer areas until a qualified biologist has determined that the young have fledged or the nest site is otherwise no longer in use.</i></li> </ul>	<p>Services Department  Qualified Biologist</p>	<p>activities</p>	
<p>Impact 3.4-4: The potential to result in direct or indirect effects on special-status mammal species.</p>	<p><b>Mitigation Measure 3.4-6:</b> <i>The project proponent shall implement the following measures to avoid or minimize impacts on special-status bats:</i></p> <ul style="list-style-type: none"> <li><i>If removal of suitable roosting areas (i.e. buildings, trees, shrubs, bridges, etc.) must occur during the bat pupping season (April 1 through July 31), surveys for active maternity roosts shall be conducted by a qualified biologist. The surveys shall be conducted from dusk until dark.</i></li> <li><i>If a special-status bat maternity roost is located, appropriate buffers around the roost sites shall be determined by a qualified biologist and implemented to avoid destruction or abandonment of the roost resulting from habitat removal or other project activities. The size of the buffer shall depend on the species, roost location, and specific construction activities to be performed in the vicinity. No project activity shall commence within the buffer areas until the end of the pupping season (August 1) or until a qualified biologist</i></li> </ul>	<p>City of Riverbank Development Services Department  Qualified Biologist</p>	<p>If removal of suitable roosting areas (i.e. buildings, trees, shrubs, bridges, etc.) must occur during the bat pupping season (April 1 through July 31)</p>	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>conforms the maternity roost is no longer active.</i>			
Impact 3.4-6: The potential to effect protected wetlands and jurisdictional waters.	<b>Mitigation Measure 3.4-7:</b> <i>If construction activities would disturb a ditch/canal/basin within the Plan Area, the property owner/applicant proposing the activity shall verify that the facility qualifies under the agricultural ditch exemption. If the facilities do not qualify for the exemption and are determined to be jurisdictional by the regulatory agencies, any fill activity would require authorization for fill from the regulatory agencies (USACE-404 permit, RWQCB-401 certification, 1600 Streambed Alteration Agreement). All requirements of a permit shall be adhered to throughout the construction phase.</i>	City of Riverbank Development Services Department  Qualified Biologist	If construction activities would disturb a ditch / canal / basin within the Plan Area	
CULTURAL AND TRIBAL RESOURCES				
Impact 3.5-1: Project implementation has the potential to cause a substantial adverse change to a significant historical resource, as defined in CEQA Guidelines §15064.5, or a significant tribal cultural resource, as defined in Public Resources Code §21074.	<p><b>Mitigation Measure 3.5-1:</b> <i>Prior to ground disturbing activities for each phase of the Project that would potentially affect one or more of the listed resources below, the resources shall be evaluated for their potential architectural and/or historic importance by a Qualified Architectural Historian, at the cost of the Project applicant. The potentially historic resources within the Project site include the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Buildings or building complexes located northwest of the Oakdale Road / Morrill Road intersection, east of the existing Riverbank Sports Complex (on APN 074-006-013);</i></li> <li>• <i>Buildings or building complexes located southwest of the Oakdale Road / Morrill Road intersection, approximately 0.18 miles south of the Riverbank Sports Complex (on APN 074-011-009);</i></li> <li>• <i>Buildings or building complexes located northwest of the Oakdale Road / Crawford Road intersection, located along Oakdale Road (on APN 074-011-009);</i></li> <li>• <i>Buildings or building complexes located southwest of the Oakdale Road / Crawford Road intersection, located 0.14 to 0.27 miles west of Oakdale Road (on APN 074-014-006); and</i></li> <li>• <i>The MID Lateral No. 6 that crosses the southern portion of the Project site.</i></li> </ul> <p><i>Work shall not continue at the above-listed site(s) until the Qualified</i></p>	City of Riverbank Development Services Department  Qualified Architectural Historian	Prior to ground disturbing activities for each phase of the Project that would potentially affect one or more of the listed resources	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>Architectural Historian conducts sufficient research and data collection to determine if the above-listed site(s) is eligible for listing on the NRHP or CRHR; or not a significant Public Trust Resource. Should the site(s) be determined to not be significant or eligible, no further action is required. Should the site(s) be determined to be significant or eligible, the Project applicant shall work with the Registered Professional Historian to develop a cultural resource plan for the site(s).</i></p> <p><i>If a building or building complex is determined to be important under the criteria of the California Register of Historical Resources, and the buildings cannot be preserved, then it is recommended that the buildings be documented through the preparation of the DPR 523 forms with large scale "HABS-like" photographs taken. Sets of these photographs shall be placed with the County museum or a suitable archival facility and the Central California Information Center, thereby preserving information on early architecture for future researchers.</i></p> <p><b>Mitigation Measure 3.5-2:</b> <i>All construction workers shall receive a cultural resources sensitivity training session before they begin site work in order to identify any potentially significant cultural or similar resources that may result during construction. The sensitivity training session shall be instructed by a professional archaeologist. The sensitivity training shall inform the workers of their responsibility to identify and protect any cultural resources, including prehistoric or historic artifacts, or other indications of archaeological resources, within the Plan Area. The sensitivity training shall cover laws pertaining to cultural resources, examples of cultural resources that may be discovered in the Plan Area, and what to do if a cultural resource, or anything that may be a cultural resource, is discovered.</i></p> <p><i>If any cultural resources, including prehistoric or historic artifacts, or other indications of archaeological resources, are found during grading and construction activities during any phase of the Project, all work shall be halted immediately within a 200-foot radius of the discovery until an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards in prehistoric or historical archaeology, as appropriate, has evaluated the find(s).</i></p> <p><i>Work shall not continue at the discovery site until the archaeologist conducts sufficient research and data collection to make a determination that the resource is either 1) a significant find; 2) not cultural in origin; or 3) not potentially significant or eligible for listing on the NRHP or CRHR; or 4)</i></p>	<p>City of Riverbank Development Services Department</p> <p>Qualified Archaeologist</p>	<p>Prior to ground disturbance</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>not a significant Public Trust Resource.</i></p> <p><i>If a significant finding is made, a plan must be developed for this inadvertent finding. Measures to potentially address a subsurface finding could include one or more of the following depending upon the nature of the find: recordation of the finding; further efforts to define the extent and nature of the resource; preservation in place, and re-design to ensure long-term preservation of the resource; and/or data recovery excavations.</i></p> <p><i>If Native American resources are identified, a Native American monitor, following the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites established by the Native American Heritage Commission, may also be required and, if required, shall be retained at the Project applicant's expense.</i></p>			
Impact 3.5-2: Project implementation has the potential to cause a substantial adverse change to a significant archaeological resource, as defined in CEQA Guidelines §15064.5.	<i>Implement <b>Mitigation Measure 3.5-2.</b></i>	See Mitigation Measure 3.5-2	See Mitigation Measure 3.5-2	
Impact 3.5-3: Project implementation has the potential to directly or indirectly destroy a unique paleontological resource.	<i><b>Mitigation Measure 3.5-3:</b> If paleontological resources are discovered during the course of construction during any phase of the Project, work shall be halted immediately within 50 meters (165 feet) of the discovery, the City of Riverbank shall be notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. If the paleontological resource is considered significant, it should be excavated by a qualified paleontologist and given to a local agency, State University, or other applicable institution, where the resource could be curated and displayed for public education purposes.</i>	City of Riverbank Development Services Department  Qualified Paleontologist	If paleontological resources are discovered during the course of construction	
Impact 3.5-4: Project implementation has the potential to disturb human remains, including those interred outside of formal cemeteries.	<i><b>Mitigation Measure 3.5-4:</b> If human remains are discovered during the course of construction during any phase of the Project, work shall be halted at the site and at any nearby area reasonably suspected to overlie adjacent human remains until the Stanislaus County Coroner has been informed and has determined that no investigation of the cause of death is required. If the remains are of Native American origin, either of the following steps will be taken:</i>	City of Riverbank Development Services Department	If human remains are discovered during the course of construction during any phase of the	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<ul style="list-style-type: none"> <li>• <i>The Coroner shall contact the Native American Heritage Commission in order to ascertain the proper descendants from the deceased individual. The coroner shall make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods, which may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.</i></li> <li>• <i>The landowner shall retain a Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, in a location that is not subject to further subsurface disturbance when any of the following conditions occurs:</i> <ul style="list-style-type: none"> <li>○ <i>The Native American Heritage Commission is unable to identify a descendent.</i></li> <li>○ <i>The descendant identified fails to make a recommendation.</i></li> <li>○ <i>The City of Riverbank or its authorized representative rejects the recommendation of the descendant, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.</i></li> </ul> </li> </ul>	San Joaquin County Coroner	project	
<b>GEOLOGY AND SOILS</b>				
Impact 3.6-2: Implementation and construction of the proposed Project may result in substantial soil erosion or the loss of topsoil	<b>Mitigation Measure 3.6-1:</b> <i>Prior to clearing, grading, and disturbances to the ground such as stockpiling, or excavation for each phase of the Project, the Project proponent shall submit a Notice of Intent (NOI) and Storm Water Pollution Prevention Plan (SWPPP) to the RWQCB to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ amended by 2010-0014-DWQ &amp; 2012-0006-DWQ). The SWPPP shall be designed with Best Management Practices (BMPs) that the RWQCB has deemed as effective at reducing erosion, controlling sediment, and managing runoff. These include: covering disturbed areas with mulch, temporary seeding, soil stabilizers, binders, fiber rolls or blankets, temporary vegetation, and permanent seeding. Sediment control BMPs, installing silt fences or</i>	City of Riverbank Development Services Department	Prior to clearing, grading, and disturbances to the ground such as stockpiling, or excavation for each phase of the Project	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p><i>placing straw wattles below slopes, installing berms and other temporary run-on and runoff diversions. These BMPs are only examples of what should be considered and should not preclude new or innovative approaches currently available or being developed. Final selection of BMPs will be subject to approval by City of Riverbank and the RWQCB. The SWPPP will be kept on site during construction activity and will be made available upon request to representatives of the RWQCB.</i></p>			
<p>Impact 3.6-3: The proposed Project has the potential to be located on a geologic unit or soil that is unstable, or that would become unstable as a result of Project implementation, and potentially result in landslide, lateral spreading, subsidence, liquefaction or collapse.</p>	<p><b>Mitigation Measure 3.6-2:</b> <i>Prior to earthmoving activities for each phase of the Project, a certified geotechnical engineer, or equivalent, shall be retained to perform a final geotechnical evaluation of the soils at a design-level as required by the requirements of the California Building Code Title 24, Part 2, Chapter 18, Section 1803.1.1.2 related to expansive soils and other soil conditions. The evaluation shall be prepared in accordance with the standards and requirements outlined in California Building Code, Title 24, Part 2, Chapter 16, Chapter 17, and Chapter 18, which addresses structural design, tests and inspections, and soils and foundation standards. The final geotechnical evaluation shall include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures, including threats from liquefaction or lateral spreading. The grading and improvement plans, as well as the storm drainage and building plans for each phase of the Project shall be designed in accordance with the recommendations provided in the final geotechnical evaluation.</i></p>	<p>City of Riverbank Development Services Department  Certified Geotechnical Engineer</p>	<p>Prior to earthmoving activities for each phase of the Project</p>	
<p>Impact 3.6-4: Potential for expansive soils to create substantial risks to life or property.</p>	<p>Implement <b>Mitigation Measure 3.6-2.</b></p>	<p>See Mitigation Measure 3.6-2</p>	<p>See Mitigation Measure 3.6-2</p>	
<p>GREENHOUSE GASES AND CLIMATE CHANGE</p>				
<p>Impact 3.7-1: Potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the</p>	<p><b>Mitigation Measure 3.7-1:</b> <i>The City shall require GHG reduction measures in connection with tentative subdivision maps submitted for approval, including but not limited to the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Actions included in Mitigation Measures 3.3-1 through 3.3-5 (see Section 3.3: Air Quality) that also reduce GHG emissions;</i></li> <li>• <i>Actions that further improve energy efficiency, such as requiring that all buildings exceed Title 24 energy-efficiency requirements by a certain percentage, requiring on-site renewable energy</i></li> </ul>	<p>City of Riverbank Development Services Department</p>	<p>Prior approval of tentative subdivision maps</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
emissions of greenhouse gases.	<p><i>production to meet a specified percent of the subdivision's electricity needs, etc.</i></p> <ul style="list-style-type: none"> <li>• <i>Actions that further reduce vehicle miles traveled, such as providing transit hubs that would be accessible by local and regional transit routes and community multimodal paths and trails; providing general pedestrian connectivity throughout the project, etc.</i></li> <li>• <i>Payment for GHG offsets, as determined to be feasible by the City.</i></li> </ul>			
HAZARDS AND HAZARDOUS MATERIALS				
<p>Impact 3.8-1: Project implementation has the potential to create a significant hazard through the routine transport, use, or disposal of hazardous materials or through the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</p>	<p><i>Implement <b>Mitigation Measure 3.6-1.</b></i></p> <p><b>Mitigation Measure 3.8-1:</b> <i>Prior to the approval of any map, Preliminary Development Plan, or site plan, the City shall review the 2017 Phase I ESA (Geocon Consultants, Inc., July 2017) cited in the Draft EIR for the CWSP to determine if it is still applicable. After July 1, 2020, the City shall require an updated Phase I ESA for the specific property. The Phase I ESA shall evaluate the specific property proposed to be developed, to ensure that no material changes have occurred since preparation of the 2017 Phase I ESA (Geocon Consultants, Inc., July 2017).</i></p> <p><b>Mitigation Measure 3.8-2:</b> <i>The applicant shall hire a qualified consultant to perform additional soil and site testing for the areas identified in this EIR to have potential hazardous conditions present prior to any mapping approvals. The following areas have been deemed to have potential hazardous conditions present:</i></p> <ul style="list-style-type: none"> <li>• <i>The residential units and adjoining structures.</i></li> <li>• <i>The remnant construction and/or farming materials (i.e. remnant pipes, etc.).</i></li> <li>• <i>The soils in the area where farming equipment and above ground tanks have been stored, including, but not limited to, the following:</i> <ul style="list-style-type: none"> <li>○ <i>The parcels associated with the Alexander Dairy (APNs</i></li> </ul> </li> </ul>	<p>See Mitigation Measure 3.6-1</p> <p>City of Riverbank Development Services Department</p> <p>City of Riverbank Development Services Department</p>	<p>See Mitigation Measure 3.6-1</p> <p>Prior to the approval of any map, Preliminary Development Plan, or site plan</p> <p>Prior to any mapping approvals</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>074-011-009 and 074-014-006).</p> <ul style="list-style-type: none"> <li>○ The parcels associated with the properties located at 5817 Oakdale Road, 5525 Oakdale Road, and 2054 Crawford Road.</li> <li>○ The Harrigfeld property located at 1901 Morrill Road.</li> <li>○ All parcels located south of Morrill Road.</li> </ul> <p>The intent of the additional testing is to investigate whether any of the buildings, facilities, or soils in any of the above parcels contain hazardous materials. If asbestos-containing materials and/or lead are found in the buildings, a California Occupational Safety and Health Administration (Cal/OSHA) certified asbestos containing building materials (ACBM) and lead based paint contractor shall be retained to remove the asbestos-containing materials and lead in accordance with EPA and Cal/OSHA standards. In addition, all activities (construction or demolition) in the vicinity of these materials shall comply with Cal/OSHA asbestos and lead worker construction standards. The ACBM and lead shall be disposed of properly at an appropriate offsite disposal facility.</p> <p><b>Mitigation Measure 3.8-3:</b> If the site investigation required by Mitigation Measure 3.8-2 indicates a probability that hazardous materials may be found on any parcel, the applicant for that parcel shall submit a Phase II ESA, which shall further evaluate on-site conditions. The Phase II ESA shall address the likely presence of hazardous substances and/or petroleum products identified in the previous Phase I ESA (Geocon Consultants, Inc., 2017) prepared for the Plan Area.</p> <p>In addition, due to the past agricultural operations in the Plan Area, a soil sampling program shall be implemented to assess potential agrichemical (including pesticides, herbicides, diesel, petrochemicals, etc.) impacts to surface soil within the Plan Area, as follows:</p> <p>A soil sampling and analysis workplan shall be submitted for approval the Stanislaus County Department of Environmental Resources. The sampling and analysis plan shall meet the requirements of the Department of Toxic Substances Control Interim Guidance for Sampling Agricultural Properties (2008), and the County Department of Environmental Resources Recommended Soil and Groundwater Sampling for Underground Tank Investigations (2013). The soils in the area where farming equipment and</p>	<p>City of Riverbank Development Services Department</p>	<p>If the site investigation required by Mitigation Measure 3.8-2 indicates a probability that hazardous materials may be found on any parcel</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>tanks have been stored, including, but not limited to, the following, should be included in the soil sampling and analysis workplan:</p> <ul style="list-style-type: none"> <li>• The parcels associated with the Alexander Dairy (APNs 074-011-009 and 074-014-006).</li> <li>• The parcels associated with the properties located at 5817 Oakdale Road, 5525 Oakdale Road, and 2054 Crawford Road.</li> <li>• The Harrigfeld property located at 1901 Morrill Road.</li> <li>• All parcels located south of Morrill Road.</li> </ul> <p>If the sampling results indicate the presence of agrichemicals that exceed commercial screening levels, a removal action workplan shall be prepared in coordination with Stanislaus County Department of Environmental Resources. The removal action workplan shall include a detailed engineering plan for conducting the removal action, a description of the onsite contamination, the goals to be achieved by the removal action, and any alternative removal options that were considered and rejected and the basis for that rejection. A no further action letter shall be issued by Stanislaus County Department of Environmental Resources upon completion of the removal action. The removal action shall be deemed complete when the confirmation samples exhibit concentrations below the commercial screening levels, which will be established by the agencies.</p> <p>If any stained soil or odor-impacted areas are encountered during the Phase II ESA, then soil sampling of these areas shall be included in the above soil sampling workplan, and depending upon the sampling results, included in the removal action workplan as well.</p> <p><b>Mitigation Measure 3.8-4:</b> Prior to bringing hazardous materials onsite, the applicant shall submit a Hazardous Materials Business Plan (HMBP) to the Stanislaus County Division of Environmental Resources (CUPA) for review and approval. If during the construction process the applicant or any subcontractors generates hazardous waste, the applicant must register with the CUPA as a generator of hazardous waste, obtain an EPA ID# and accumulate, ship and dispose of the hazardous waste per Health and Safety Code Ch. 6.5. (California Hazardous Waste Control Law).</p> <p><b>Mitigation Measure 3.8-5:</b> Prior to initiation of any ground disturbance</p>	<p>Stanislaus County Division of Environmental Resources</p> <p>City of Riverbank</p>	<p>Prior to bringing hazardous materials onsite</p> <p>Prior to initiation of any</p>	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<p>activities within 50 feet of a well, the applicant shall hire a licensed well contractor to obtain a well abandonment permit from Stanislaus County Department of Environmental Resources, and properly abandon the on-site wells, pursuant to review and approval of the City Engineer and the Stanislaus County Department of Environmental Resources.</p> <p>Implement <b>Mitigation Measures 3.8-1, 3.8-2, 3.8-3, 3.8-4, and 3.8-5.</b></p>	<p>Development Services Department</p> <p>See Mitigation Measures 3.8-1, 3.8-2, 3.8-3, 3.8-4, and 3.8-5</p>	<p>ground disturbance activities within 50 feet of a well</p> <p>See Mitigation Measures 3.8-1, 3.8-2, 3.8-3, 3.8-4, and 3.8-5</p>	
NOISE				
<p>Impact 3.11-1: Construction of the proposed Project may generate significant noise.</p>	<p><b>Mitigation Measure 3.11-1:</b> Construction activities shall not occur between 6:30 p.m. and 6:00 a.m. on weekdays or 5:00 p.m. and 8:00 a.m. on weekends and legal holidays, as required by the City of Riverbank Municipal Code. This requirement shall be noted in the improvements plans prior to approval by the City's Public Works Department.</p> <p><b>Mitigation Measure 3.11-2:</b> In an effort to comply with the City General Plan standards contained in Table 3.11-6 (Table N-3 of the General Plan), all equipment shall be fitted with factory equipped mufflers, and in good working order. In addition, all staging areas shall be located as far as feasibly possible from residential areas. This requirement shall be noted in the improvements plans prior to approval by the City's Public Works Department.</p>	<p>City of Riverbank Public Works Department</p> <p>City of Riverbank Public Works Department</p>	<p>During construction activities</p> <p>During construction activities</p>	
<p>Impact 3.11-4: The proposed Project may result in traffic noise at new sensitive receptors.</p>	<p><b>Mitigation Measure 3.11-3:</b> The Project applicant(s) shall determine the appropriate methods for reducing traffic noise levels at the Project site to within the City of Riverbank noise level criteria. It is expected that traffic noise levels could exceed the City standards at residential areas adjacent to Oakdale Road, Morrill Road and Claribel Road. Mitigation can take the form of sound walls, berms, a combination of walls and berms, setbacks and shielding from building facades. The effectiveness of the proposed mitigation shall be documented by acoustical analyses. The appropriate mitigation will be determined prior to the approval of tentative maps or site plans, and subject to review and approval by the City of Riverbank.</p>	<p>City of Riverbank Public Works Department</p>	<p>Prior to approval of tentative maps or site plans</p>	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
<p>Impact 3.11-5: The proposed Project may result in noise from on-site activities at sensitive receptors.</p>	<p><b>Mitigation Measure 3.11-4:</b> <i>The center of the play fields shall be located at a minimum distance of 275-feet from the nearest residences. This requirement shall be noted in the improvements plans prior to approval by the City's Public Works Department.</i></p> <p><b>Mitigation Measure 3.11-5:</b> <i>Use of the play fields shall be restricted to the daytime hours of 7:00 a.m. to 10:00 p.m. This requirement shall be noted in the improvements plans prior to approval by the City's Public Works Department.</i></p> <p><b>Mitigation Measure 3.11-6:</b> <i>When school site plans have been developed, a detailed analysis of school site noise impacts shall be identified and appropriate mitigation measures shall be included in the project designs. The City shall review and approve the analysis of school site noise impacts, as well as any mitigation measures resulting from the analysis.</i></p>	<p>City of Riverbank Public Works Department</p> <p>City of Riverbank Public Works Department</p> <p>City of Riverbank Public Works Department</p>	<p>Prior to approval of improvement plans</p> <p>Prior to approval of improvement plans</p> <p>Prior to approval of improvement plans</p>	
PUBLIC SERVICES AND RECREATION				
<p>Impact 3.12-1: The proposed Project has the potential to require the construction of police department facilities which may cause substantial adverse physical environmental impacts.</p>	<p><b>Mitigation Measure 3.12-1:</b> <i>Prior to the City recording a "Final Map" for each Project within the Plan Area, the owner of the project/map shall either annex the mapped property into a Community Facilities District ("CFD"), or create a new CFD for the mapped property, which will include funding for operational services with the Riverbank Police Department (Stanislaus County Sheriff).</i></p>	<p>City of Riverbank Development Services Department</p>	<p>Prior to the City recording a "Final Map" for each Project within the Plan Area</p>	
<p>Impact 3.12-5: The proposed Project has the potential to require the construction of park and recreational facilities which may cause substantial adverse physical environmental impacts.</p>	<p><b>Mitigation Measure 3.12-2:</b> <i>Prior to the recording of any Final Maps, or in connection with any other final approvals for the MU-1 "Mixed Use Retail" area dedicated to residential development, the project developer shall dedicate and finance the improvement of sufficient park land in accordance with a park improvement plan, subject to approval by the City, or pay sufficient in lieu fees in accordance with the Quimby Act and the City's General Plan policy, to develop at least five acres of parkland per 1,000 residents. If sufficient park area is not provided for in the subdividable lands in accordance with the Quimby Act and City Ordinances, the Project applicant shall demonstrate where the parkland dedication may occur and provide surety of its dedication and improvement according to a defined time line for dedication and improvement. This dedication requirement shall include development of full park improvement plans to be approved by the Director of Parks and Recreation. The timing of the park improvements shall be negotiated with the developer unless stipulated in a Development</i></p>	<p>City of Riverbank Development Services Department</p>	<p>Prior to the recording of any Final Maps, or in connection with any other final approvals for the MU-1 "Mixed Use Retail" area dedicated to residential development</p>	

# 4.0

# FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>Agreement or Subdivision Improvement Agreement.</i>			
TRANSPORTATION AND CIRCULATION				
Impact 3.13-1: Under Existing conditions, the proposed Project would result in a significant impact at the Patterson Road / Coffee Road intersection.	<b>Mitigation Measure 3.13-1:</b> <i>Prior to issuance of any Building Permits for the CWSP Project, each project applicant in the Plan Area shall pay the applicable City of Riverbank Impact Fee towards the improvement of the Patterson Road / Coffee Road intersection in order to satisfy their fair share obligation.</i>	City of Riverbank Public Works Department	Prior to issuance of any Building Permits for the CWSP Project	
Impact 3.13-2: Under Existing conditions, the proposed Project would result in a significant impact at the Claribel Road / Oakdale Road intersection.	<b>Mitigation Measure 3.13-2:</b> <i>Prior to the approval of a Final Map or improvement plans, each applicant within the CWSP Project shall be responsible for the project's fair share impacts towards the cost of widening Oakdale Road to provide a second southbound travel lane that continues beyond Claribel Road a distance sufficient to accommodate efficient intersection traffic operations and a transition back to a single lane, as well as a northbound right turn lane. The distance needed to accommodate the auxiliary through lane and transition back to a single lane is roughly ¼ mile. This roadway improvement shall be noted on the project improvement plans.</i>  <i>The sum of each project applicant's fair share cost shall be equal to the total cost to construct the entire improvement, and the sum of the fair share costs shall be used by the developer(s) to construct the entire improvement. The specific segments of roadway which would be widened shall be completed as determined by the City Engineer based on the level of development being proposed at the time.</i>	City of Riverbank City Engineer	Prior to the approval of a Final Map or improvement plans	
Impact 3.13-3: Under Existing conditions, the proposed Project would result in a significant impact at the Claribel Road / N-S Collector intersection.	<b>Mitigation Measure 3.13-3:</b> <i>Prior to approval of a Final Map or improvement plans, each applicant within the CWSP Project shall be responsible for the project's fair share impacts towards the cost of constructing a traffic signal and ancillary lanes at the Claribel Road / N-S Collector intersection. When warranted, construction of the traffic signal shall be required, to the satisfaction of the City of Riverbank City Engineer. The additional ancillary lanes shall be completed as determined by the City Engineer based on the level of development being proposed at the time. When warranted, this roadway improvement shall be noted on the improvement plans for such project.</i>  <i>The sum of each project applicant's fair share cost shall be equal to the total cost to construct the entire improvement, and the sum of the fair share costs</i>	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>shall be used by the developer(s) to construct the entire improvement.</i>			
Impact 3.13-5: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Patterson Road from McHenry Avenue to Coffee Road.	<b>Mitigation Measure 3.13-4:</b> <i>Prior to issuance of any Building Permits for each project in the Plan Area, each project applicant shall pay the applicable City of Riverbank Impact Fee towards widening of SR 108 to four-lanes in order to satisfy their fair share obligation.</i>	City of Riverbank Public Works Department	Prior to issuance of any Building Permits for each project in the Plan Area	
Impact 3.13-6: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from McHenry Avenue to Coffee Road.	<b>Mitigation Measure 3.13-5:</b> <i>Prior to issuance of any Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Corridor in order to satisfy their fair share obligation.</i>	Stanislaus Council of Governments	Prior to issuance of any Building Permits for each project in the Plan Area	
Impact 3.13-7: Under Existing conditions, the proposed Project would result in a significant impact at the segment of Claribel Road from Oakdale Road to Claus Road.	<b>Mitigation Measure 3.13-6:</b> <i>Prior to issuance of Building Permits for the Project, each project applicant in the Plan Area shall pay the applicable City of Riverbank Impact Fee and County RTIF fee towards the improvement of Claribel Road from Oakdale Road to Claus Road in order to satisfy their fair share obligation.</i>	Stanislaus Council of Governments	Prior to issuance of Building Permits for the Project	
Impact 3.13-9: Under Existing conditions, the proposed Project would result in a significant impact at the Oakdale Road between Morrill Road and Crawford Road segment.	<b>Mitigation Measure 3.13-7:</b> <i>Prior to issuance of any Building Permits each project within the Plan Area, each project applicant shall be responsible for contributing the fair share contribution towards the costs of widening Oakdale Road to four lanes by providing a second southbound through travel lane between Morrill Road and Crawford Road. The applicant shall be responsible for widening Oakdale Road when determined by the City Engineer.</i>	City of Riverbank City Engineer	Prior to issuance of any Building Permits each project within the Plan Area	
Impact 3.13-11: The proposed Project would adversely affect pedestrian and bicycle facilities.	<p><b>Mitigation Measure 3.13-8:</b> <i>Each project applicant in the Plan Area shall work with City of Riverbank staff to identify applicable pedestrian crossing features and shall install the features, when warranted, to the satisfaction of the City of Riverbank City Engineer.</i></p> <p><b>Mitigation Measure 3.13-9:</b> <i>Each project applicant in the Plan Area shall monitor pedestrian, bicycle, and motor vehicle safety conditions as development proceeds. Any identified safety conditions as a result of this</i></p>	<p>City of Riverbank City Engineer</p> <p>City of Riverbank City</p>	<p>When warranted, as determined by the City Engineer</p> <p>When warranted, as</p>	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
	<i>monitoring shall be installed to alleviate these concerns, as applicable, to the satisfaction of the City of Riverbank City Engineer.</i>	Engineer	determined by the City Engineer	
Impact 3.13-12: The proposed Project would adversely affect transit services or facilities.	<b>Mitigation Measure 3.13-10:</b> <i>The project applicants in the CWSP Area shall install the transit elements included in the CWSP. The project applicants shall work with Stanislaus Regional Transit staff to identify applicable on-site transit facilities and features in order to ensure that transit facilities are incorporated into the project. The transit facilities and features may include, but would not be limited to, bus turnouts, bus stops, and signage. The project applicants shall install the features, when warranted, to the satisfaction of the City Engineer.</i>	City of Riverbank City Engineer  Stanislaus Regional Transit	When warranted, as determined by the City Engineer	
Impact 3.13-13: Under EPAP conditions, the proposed Project would result in a significant impact to queue lengths.	<b>Mitigation Measure 3.13-11:</b> <i>Prior to approval of a Final Map or improvement plans, each project applicant within the CWSP Area shall be responsible for lengthening the available storage in left turn lanes at the Oakdale Road / Crawford Road, Oakdale Road / Freddi Lane, and Oakdale Road / Claribel Road intersections. The applicants shall be responsible for lengthening specific turn lanes when determined by the City Engineer. These roadway improvements shall be noted on the project improvement plans.</i>	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
Impact 3.13-14: Under EPAP conditions, the proposed Project would result in a significant impact at the proposed mixed use retail area access.	<b>Mitigation 3.13-12:</b> <i>Prior to approval of a Final Map or improvement plans for the "MU-1 Mixed Use Retail" area, the project applicant shall be responsible for providing a design for vehicular access to the satisfaction of the City of Riverbank City Engineer when development of the "MU-1 Mixed Use Retail" area proceeds. This roadway design shall be noted on the project improvement plans.</i>	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans for the "MU-1 Mixed Use Retail" area	
Impact 3.13-15: Under EPAP conditions, the proposed Project would result in a significant impact at the McHenry Avenue / Kiernan Avenue / Claribel Avenue intersection.	<b>Mitigation Measure 3.13-13:</b> <i>Prior to issuance of Building Permits for each project in the Plan Area, each project applicant shall pay the applicable County RTIF fee towards construction of the North County Corridor in order to satisfy their fair share obligation.</i>	Stanislaus Council of Governments	Prior to issuance of Building Permits for each project in the Plan Area	
Impact 3.13-16: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Patterson Road /	<b>Implement Mitigation Measure 3.13-1.</b>	See Mitigation Measure 3.13-1	See Mitigation Measure 3.13-1	

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
Coffee Road intersection.				
Impact 3.13-17: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Coffee Road / Morrill Road intersection.	<b>Mitigation Measure 3.13-14:</b> Prior to approval of a Final Map or improvement plans, each applicant within the CWSP Project shall be responsible for the project's fair share impacts towards the cost of installing a traffic signal at the Coffee Road / Morrill Road intersection. When warranted, construction of the traffic signal shall be required, to the satisfaction of the City of Riverbank City Engineer. When warranted, this roadway improvement shall be noted on the improvement plans for such project.	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
Impact 3.13-18: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Coffee Road / Relocated Crawford Road intersection.	<b>Mitigation Measure 3.13-15:</b> Prior to approval of a Final Map or improvement plans, each project applicant shall be responsible for its fair share of the cost of installing traffic signal at the Coffee Road / Relocated Crawford Road intersection. The signal shall be installed when conditions warrant, as determined by the City of Riverbank City Engineer.	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
Impact 3.13-19: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Claribel Road / N-S Collector intersection.	Implement <b>Mitigation Measure 3.13-3.</b>	See Mitigation Measure 3.13-3	See Mitigation Measure 3.13-3	
Impact 3.13-20: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the Claribel Road / Oakdale Road intersection.	<b>Mitigation Measure 3.13-16:</b> Prior to approval of a Final Map or improvement plans, each applicant in the Plan Area shall be responsible for the project's fair share impacts towards the cost of adding a second northbound left turn lane at the Claribel Road / Oakdale Road intersection, as determined by the City of Riverbank City Engineer. When warranted, the addition of a second northbound left turn lane shall be required, to the satisfaction of the Stanislaus County Road Commissioner. When warranted, this roadway improvement shall be noted on the improvement plans for such project.	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
Impact 3.13-24: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the segment of Coffee	<b>Mitigation Measure 3.13-17:</b> Prior to approval of a Final Map or improvement plans, each project applicant in the Plan Area shall be responsible for the fair share of the cost of improving Coffee Road from Morrill Road to the relocated Crawford Road intersection to provide the functional equivalent of a two-lane arterial street standard, as determined by	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement	

4.0

FINAL MITIGATION MONITORING AND REPORTING PROGRAM

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	MONITORING RESPONSIBILITY	TIMING	VERIFICATION (DATE/INITIALS)
Road between Morrill Road and the relocated Crawford Road.	<i>the City of Riverbank City Engineer.</i>		plans	
Impact 3.13-25: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the segment of Coffee Road between the relocated Crawford Road and the realigned Claribel Road intersection.	<b>Mitigation Measure 3.13-18:</b> <i>Prior to approval of a Final Map or improvement plans, each project applicant in the Plan Area shall be responsible for contributing its fair share to the cost of improving Coffee Road from the relocated Crawford Road intersection to the realigned Claribel Road intersection to the equivalent of a four-lane arterial street standard, as determined by the City of Riverbank City Engineer.</i>	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
Impact 3.13-26: Under Cumulative (Year 2042) conditions, the proposed Project would result in a significant impact at the segment of Coffee Road between the realigned Claribel Road intersection and NCC.	<b>Mitigation Measure 3.13-19:</b> <i>Prior to approval of a Final Map or improvement plans, each project applicant in the Plan Area shall be responsible for contributing its fair share fee to the cost of improving Coffee Road from the realigned Claribel Road intersection to NCC to a four-lane arterial street standard.</i>	City of Riverbank City Engineer	Prior to approval of a Final Map or improvement plans	
UTILITIES				
Impact 3.14-6: The proposed Project has the potential to 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.	<b>Mitigation Measure 3.14-1:</b> <i>Prior to the issuance of a building or grading permit, the Project applicant shall submit a drainage plan to the City of Riverbank for review and approval. The plan shall include an engineered storm drainage plan that demonstrates attainment of pre-Project runoff requirements prior to release and describes the volume reduction measures and treatment controls used to reach attainment consistent with the Riverbank Low Impact Development Design and Specifications Manual, the Riverbank Storm Drain System Master Plan, and the Crossroads West Specific Plan.</i>	City of Riverbank City Engineer	Prior to the issuance of a building or grading permit	