



CEQA Referral Initial Study And Notice of Intent to Adopt a Negative Declaration

Date: December 8, 2021

To: Distribution List (See Attachment A)

From: Emily Basnight, Assistant Planner, Planning and Community Development

Subject: USE PERMIT APPLICATION NO. PLN2021-0068 – WOOD COLONY CHRISTIAN SCHOOL

Comment Period: December 8, 2021 – January 10, 2022

Respond By: January 10, 2022

Public Hearing Date: Not yet scheduled. A separate notice will be sent to you when a hearing is scheduled.

You may have previously received an Early Consultation Notice regarding this project, and your comments, if provided, were incorporated into the Initial Study. Based on all comments received, Stanislaus County anticipates adopting a Negative Declaration for this project. This referral provides notice of a 30-day comment period during which Responsible and Trustee Agencies and other interested parties may provide comments to this Department regarding our proposal to adopt the Negative Declaration.

All applicable project documents are available for review at: Stanislaus County Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, CA 95354. Please provide any additional comments to the above address or call us at (209) 525-6330 if you have any questions. Thank you.

Applicant: Carla Hoblit, Wood Colony Christian School, Inc.

Project Location: 2524, 2530, and 2572 Finney Road, between North Avenue and Beckwith Road, in the Modesto area.

APN: 005-030-020 and 005-030-035

Williamson Act Contract: N/A

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-40)

Project Description: Request to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field in the A-2-40 zoning district. The existing track and field did not receive appropriate land use entitlements prior to establishment. As such, a use permit is required to amend the boundaries for the school located on Assessor Parcel Number (APN) 005-030-035 and permit the existing track and field currently located on the eastern portion of APN 005-030-020, to the north of the school facility. If approved, a Lot Line Adjustment (LLA) application will be processed following the expansion request, to maintain the use on one parcel. No construction or site development is proposed under this request. The existing track is currently 24-foot wide, composed of hard packed dirt and encircles a 1.3± acre field, which will be used as a soccer field. The existing field currently receives irrigation



water from Modesto Irrigation District. The applicant has requested an alternative from the County's Agricultural Buffer requirements on the east and north portion of the project site consisting of a 0-foot buffer and a proposed 6-foot tall slatted chain link fence along the north and east property lines of APN 005-030-020. The existing school was permitted under Use Permit 79-85 – Brethren Heritage School, for temporary instruction of 150 students. Subsequently, the permit was amended under a time extension in 1982 to allow for 250 students and a permanent school facility. The project site is currently developed with the following: approximately 26,000± square-feet of building space for instructional use; two residences; a tool shed; a 3,575± square-foot barn; three parking areas consisting of 59 standard spaces and 2 accessible spaces; and 1± acre area consisting of a basketball court and baseball field. The two residences onsite are occupied by caretakers of the school facility. The project site is landscaped with mature deciduous and evergreen trees along the road frontage and adjacent to the instructional buildings and residences. On-site lighting for the existing school facility consists of fifty-five exterior wall fixtures on the existing buildings, and five pole-lighting fixtures approximately 18-20 feet in height. The school operates Monday through Friday from 8:00 a.m. to 3:00 p.m. No changes to the hours of operation are proposed as part of this request. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. The school currently enrolls 60-85 students from Kindergarten to eighth grade and a total of 27 employees. The students are brought to school by 6-7 school buses with 10-12 students per bus and no more than 10 students are brought to school by individual passenger vehicles per day. No increase in the number of students or employees is anticipated under this request. The site is served by the Wood Colony Christian School Public Water System and private septic system, and has access to County-maintained Finney Road.

Full document with attachments available for viewing at:
<http://www.stancounty.com/planning/pl/act-projects.shtm>



USE PERMIT APPLICATION NO. PLN2021-0068 – WOOD COLONY CHRISTIAN SCHOOL

Attachment A

Distribution List

| | | | |
|---|--|---|---|
| | CA DEPT OF CONSERVATION Land Resources / Mine Reclamation | | STAN CO ALUC |
| X | CA DEPT OF FISH & WILDLIFE | | STAN CO ANIMAL SERVICES |
| | CA DEPT OF FORESTRY (CAL FIRE) | X | STAN CO BUILDING PERMITS DIVISION |
| | CA DEPT OF TRANSPORTATION DIST 10 | X | STAN CO CEO |
| X | CA OPR STATE CLEARINGHOUSE | | STAN CO CSA |
| X | CA RWQCB CENTRAL VALLEY REGION | X | STAN CO DER |
| | CA STATE LANDS COMMISSION | X | STAN CO ERC |
| | CEMETERY DISTRICT | X | STAN CO FARM BUREAU |
| X | CENTRAL VALLEY FLOOD PROTECTION | X | STAN CO HAZARDOUS MATERIALS |
| | CITY OF | | STAN CO PARKS & RECREATION |
| | COMMUNITY SERVICES/SANITARY DIST | X | STAN CO PUBLIC WORKS |
| X | COOPERATIVE EXTENSION | | STAN CO RISK MANAGEMENT |
| | COUNTY OF: | X | STAN CO SHERIFF |
| X | DER - GROUNDWATER RESOURCES DIVISION | X | STAN CO SUPERVISOR DIST 3: WITHROW |
| X | FIRE PROTECTION DIST: SALIDA | X | STAN COUNTY COUNSEL |
| X | GSA: STANISLAUS AND TUOLUMNE RIVERS | | StanCOG |
| | HOSPITAL DIST: | X | STANISLAUS FIRE PREVENTION BUREAU |
| X | IRRIGATION DIST: MODESTO | X | STANISLAUS LAFCO |
| X | MOSQUITO DIST: EASTSIDE | X | STATE OF CA SWRCB – DIV OF DRINKING WATER DIST. 10 |
| X | MOUNTAIN VALLEY EMERGENCY MEDICAL SERVICES | X | SURROUNDING LAND OWNERS |
| X | MUNICIPAL ADVISORY COUNCIL: WOOD COLONY | X | TELEPHONE COMPANY: AT&T |
| X | PACIFIC GAS & ELECTRIC | | TRIBAL CONTACTS (CA Government Code §65352.3) |
| | POSTMASTER: | | US ARMY CORPS OF ENGINEERS |
| | RAILROAD: | | US FISH & WILDLIFE |
| X | SAN JOAQUIN VALLEY APCD | | US MILITARY (SB 1462) |
| X | SCHOOL DIST 1: HART-RANSOM UNION | | USDA NRCS |
| X | SCHOOL DIST 2: MODESTO UNION | | WATER DIST: |
| | WORKFORCE DEVELOPMENT | X | SFPUC: HETCH HETCHY |
| X | STAN CO AG COMMISSIONER | | |



STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: USE PERMIT APPLICATION NO. PLN2021-0068 – WOOD COLONY CHRISTIAN SCHOOL

Based on this agency’s particular field(s) of expertise, it is our position the above described project:

- _____ Will not have a significant effect on the environment.
- _____ May have a significant effect on the environment.
- _____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

| Name | Title | Date |
|------|-------|------|
|------|-------|------|



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

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

CEQA INITIAL STUDY

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

1. **Project title:** Use Permit Application No. PLN2021-0068 – Wood Colony Christian School
2. **Lead agency name and address:** Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
3. **Contact person and phone number:** Emily Basnight, Assistant Planner
209-525-6330
4. **Project location:** 2524, 2530, and 2572 Finney Road, between North Avenue and Beckwith Road, in the Modesto area (APN:005-030-020 and 005-030-035).
5. **Project sponsor's name and address:** Carla Hoblit, Wood Colony Christian School, Inc.
2572 Finney Road, Modesto, CA 95358
6. **General Plan designation:** Agriculture
7. **Zoning:** General Agriculture (A-2-40)
8. **Description of project:**

Request to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field in the A-2-40 zoning district. The existing track and field did not receive appropriate land use entitlements prior to establishment. As such, a use permit is required to amend the boundaries for the school located on Assessor Parcel Number (APN) 005-030-035 and permit the existing track and field currently located on the eastern portion of APN 005-030-020, to the north of the school facility. If approved, a Lot Line Adjustment (LLA) application will be processed following the expansion request, to maintain the use on one parcel. No construction or site development is proposed under this request. The existing track is currently 24-foot wide, composed of hard packed dirt and encircles a 1.3± acre field, which will be used as a soccer field. The existing field currently receives irrigation water from Modesto Irrigation District. The applicant has requested an alternative from the County's Agricultural Buffer requirements on the east and north portion of the project site consisting of a 0-foot buffer and a proposed 6-foot tall slatted chain link fence along the north and east property lines of APN 005-030-020. The existing school was permitted under Use Permit 79-85 – Brethren Heritage School, for temporary instruction of 150 students. Subsequently, the permit was amended under a time extension in 1982 to allow for 250 students and a permanent school facility. The project site is currently developed with the following: approximately 26,000± square-feet of building space for instructional use; two residences; a tool shed; a 3,575± square-foot barn; three parking areas consisting of 59 standard spaces and 2 accessible spaces; and 1± acre area consisting of a basketball court and baseball field. The two residences onsite are occupied by caretakers of the school facility. The project site is landscaped with mature deciduous and evergreen trees along the road frontage and adjacent to the instructional buildings and residences. On-site lighting for the existing school facility consists of fifty-five exterior wall fixtures on the existing buildings, and five pole-lighting fixtures approximately 18-20 feet in height. The school operates Monday through Friday from 8:00 a.m. to 3:00 p.m. No changes to the hours of operation are proposed as part of this request. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. The school currently enrolls 60-85 students from Kindergarten to eighth grade and a total of 27 employees. The students are brought to school by 6-7 school buses with 10-12 students per bus and no more than 10 students are brought to school by individual passenger vehicles per day. No increase in the number of students or employees is anticipated under this request. The site is served by the

Wood Colony Christian School Public Water System and private septic system, and has access to County-maintained Finney Road.

- 9. **Surrounding land uses and setting:** Single-family dwellings, ranchettes and walnut and almond orchards in all directions; Hetch Hetchy right-of-way to the south and Modesto Irrigation District Lateral No. 7 to the west.

- 10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** CalTrans
Stanislaus County Department of Public Works
Department of Environmental Resources

- 11. **Attachments:** None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

Signature on file
Prepared by _____

December 8, 2021
Date _____

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, than the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

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

- a) **Earlier Analysis Used.** Identify and state where they are available for review.
 - b) **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). References to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) **Supporting Information Sources:** A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
 - 9) The explanation of each issue should identify:
 - a) the significant criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significant.

ISSUES

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

Discussion: The only scenic designation in the County is along I-5, which is not near the project site. The site itself is not considered to be a scenic resource or a unique vista. The project site is considered topographically flat. The surrounding area is composed of single-family dwellings, ranchettes and walnut and almond orchards in all directions. The Hetch Hetchy right-of-way is to the south of the project site and Modesto Irrigation District Lateral No. 7 is to the west.

This project proposes to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a dirt track and soccer field. This use permit will amend the boundaries for the school located on Assessor Parcel Number (APN) 005-030-035 and permit the existing dirt track and grassy field currently located on the eastern portion of APN 005-030-020, to the north of the school facility. The project will not degrade the existing visual character or quality of the site or its surroundings as the dirt track and grassy field area are an extension of the current school facility which is improved with approximately 26,000± square-feet of building space for instructional use; two residences; a tool shed; a 3,575± square-foot barn; three parking areas; and 1± acre area consisting of a basketball court and baseball field. The project site is currently landscaped with mature deciduous and evergreen trees along the road frontage and adjacent to the instructional buildings and residences. On-site lighting for the existing school facility consists of fifty-five exterior wall fixtures on the existing buildings, and five pole-lighting fixtures approximately 18-20 feet in height. No additional landscaping or outdoor lighting is proposed for the track and field. No construction is proposed under this request.

The applicant proposes to install a 6-foot tall slatted chain link fence on the north and east property lines of APN 005-030-020.

No adverse impacts to the existing visual character of the site or its surroundings are anticipated.

Mitigation: None.

References: Application information; Stanislaus County Zoning Ordinance; the Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: The California Revised Storie Index is a rating system based on soil properties that dictate the potential for soils to be used for irrigated agricultural production in California. This rating system grades soils with an index rating of 90 and 93 as excellent. The project site developed with the school facility is classified as “Urban and Built-up Land” by the California Department of Conservation’s Farmland Mapping and Monitoring Program, and the baseball field and track and field areas are classified as “Prime Farmland” by the California Department of Conservation’s Mapping and Monitoring Program. The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that property is primarily comprised of Dinuba fine sandy loam (DmA), 0 to 1 percent slopes, with a Storie Index rating of 90 and grade 1; and Hanford sandy loam (HdA), 0 to 3% percent slopes, with a Storie Index rating of 93 and grade 1; these comprise approximately all acres of the project site and are considered to be prime farmland.

The project site has general plan designation of Agriculture and Zoning Destination of General Agriculture (A-2-40). Within the A-2 zoning district, the County has determined that certain uses that are not directly related to agriculture but may be necessary to serve the A-2 district or may be difficult to locate in an urban area can be permitted under a Tier Three Use Permit. Schools are permitted in the A-2 zoning district upon approval of a Use Permit as a Tier Three use. Some Tier Three uses can be people-intensive and, as a result, have the potential to adversely impact agriculture. Tier Three uses may be allowed when the Planning Commission finds that:

1. The establishment, maintenance and operation of the proposed use or building applied for is consistent with the general plan and will not, under the circumstances of the particular case, be detrimental to the health, safety and

general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county.

2. The use as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity; and
3. The parcel on which such use is requested is not located in one of the county's "most productive agricultural areas," as that term is used in the agricultural element of the general plan; or the character of the use that is requested is such that the land may reasonably be returned to agricultural use in the future.

The project site is not located in one of the most productive agricultural areas of the County. In determining most productive agricultural areas, factors to be considered include but are not limited to soil types and potential for agricultural production; the availability of irrigation water; and the existence of Williamson Act contracts. The project site is comprised of grade 1 soils with Storie index ratings of 93 and 90 which are considered to be prime farmland. However, according to Goal Two, Policy 2.5, Implementation Measure 1, of the General Plan's Agricultural Element, when defining the County's most productive agricultural areas, it is important to recognize that soil types alone should not be the determining factor. Although soil types should be considered, the designation of "most productive agricultural areas" also should be based on existing uses and their contributions to the agricultural sector of our economy. The 7± acre project site is currently developed with a school facility and residential uses on APN 005-030-035, and the dirt track and grassy field on APN 005-030-020. The existing baseball field and track and field areas of the project site are classified as "Prime Farmland" by the California Department of Conservation's Farmland Mapping and Monitoring Program; however, the project site developed with the school facility is classified as "Urban and Built-up Land." The 7± acre project site is not enrolled under the Williamson Act, and is not currently being used for agricultural production. Based on this information the project site will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use and will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use as the existing project site is already developed with non-agricultural uses and the track and field can easily be returned to farmland.

The existing school facility has been improved with approximately 26,000± square-feet of building space for instructional use, as well as two residences, a tool shed and a 3,575± square-foot barn. No construction is proposed as part of this project. The request is not expected to perpetuate any significant conversion of farmland to non-agricultural use as the track and field are existing. The surrounding area is composed of single-family dwellings, ranchettes and walnut and almond orchards in all directions. Hetch Hetchy right-of-way is to the south of the project site and Modesto Irrigation District Lateral No. 7 is to the west. No impacts to agriculture are anticipated to occur as a result of this project as the project site is currently developed with the school facility and the existing track consists of hard-packed dirt and a grassy field, and is considered topographically flat.

In December of 2007, Stanislaus County adopted an updated Agricultural Element which incorporated guidelines for the implementation of agricultural buffers applicable to new and expanding non-agricultural uses within or adjacent to the A-2 Zoning District. Appendix A states: "All projects shall incorporate a minimum 150-foot-wide buffer setback. Projects which propose people intensive outdoor activities, such as athletic fields, shall incorporate a minimum 300-foot-wide buffer setback. The purpose of these guidelines is to protect the long-term health of agriculture by minimizing conflicts such as spray-drift and trespassing resulting from the interaction of agricultural and non-agricultural uses. Alternatives may be approved provided the Planning Commission finds that the alternative provides equal or greater protection than the existing buffer standards. The project proposes an athletic field which is considered to be people intensive and requires a 300-foot setback from the proposed use to adjacent agriculturally zoned property. The nearest parcels in agricultural production are adjacent to the north and east, with the adjacent parcel to the north being enrolled in a Williamson Act contract. The adjacent parcels to the south are not in agricultural production. Parcels to the west and south of the project site are actively farmed and enrolled in Williamson Act contracts; however, the parcels are separated from the project site by Finney Road to the west, and North Avenue to the south. The existing track and field will be within the 300-foot agricultural buffer from the properties adjacent to the north and east. The existing school facility was permitted prior to the Agricultural Buffer policy and the majority of the existing school facility is located within the 300-foot buffer area from adjacent agriculturally zoned properties in all directions. The applicant has proposed a 0-foot buffer and a 6-foot tall slatted chain link fence along the north and east property lines of APN 005-030-020, as an alternative from the County's Agricultural Buffer requirement. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. Groups of 10-15 students at a time will use the track and field throughout the day from 8:00 a.m. to 3:00 p.m., Monday-Friday. No new construction of buildings, or bleachers within the 300-foot buffer area are being proposed.

The project was referred to the Agricultural Commissioner’s office who replied with no concerns for the proposed project.

The project site is located within the Modesto Irrigation District (MID) boundaries. The project was referred to MID who responded with comments concerning a thirty-six-inch private concrete pipeline that lies along the east property lines of APNs 005-030-035 (existing school) and 005-030-020 (parcel to the north). If the project will impact or alter existing private irrigation infrastructure, the pipeline must be upgraded, replaced and/or relocated as required by the pipeline owner, and the applicant should consult with affected landowners to discuss potential improvement plans for review and approval. Additionally, the applicant/property owner must contact Irrigation Field Services to update their irrigation billing account to reflect the parcel changes associated with this request. Conditions of approval reflecting MID’s comments will be applied to the project.

No forest lands exist in Stanislaus County. Therefore, this project will have no impact to forest land or timberland. There is no indication that this project will result in the removal of adjacent contracted land from agricultural use. Impacts to agriculture and forest resources are considered to be less than significant.

Mitigation: None.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Email received from the Stanislaus County Office of the Agricultural Commissioner and Sealer of Weights and Measures, dated December 3, 2021; Modesto Irrigation District referral response, dated October 20, 2021; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

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

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

The project is a request to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field. No construction or site development is proposed under this request. The existing track is currently 24-foot wide, composed of hard packed dirt and encircles a 1.3± acre field, which will be used as a soccer field. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed.

The primary source of air pollutants generated by this project would be classified as being generated from "mobile" sources. Mobile sources would generally include dust from roads, farming, and automobile exhausts. Mobile sources are generally regulated by the Air Resources Board of the California EPA which sets emissions for vehicles and acts on issues regarding

cleaner burning fuels and alternative fuel technologies. As such, the District has addressed most criteria air pollutants through basin wide programs and policies to prevent cumulative deterioration of air quality within the Basin. The project will not substantially increase traffic in the area and, thereby, impact air quality

As part of SJVAPCD's formulation and implementation of air pollution control strategies, the Small Project Analysis Level (SPAL) guidance identifies thresholds of significance for criteria pollutant emissions, which are based on the District's New Source Review (NSR) off-set requirements for stationary sources. The District has pre-qualified emissions and determined a size below which is reasonable to conclude that a project would not exceed applicable thresholds of significance for criteria pollutants. The provided sizes by the District are deemed to have a less than significant impact on air quality due to criteria pollutant emissions. The District's threshold of significance for school related projects for Junior High Schools with 1,440 students or less, and Elementary schools with 1,880 students or less, is 1,000 one-way vehicle trips for all fleet types per day, or less than 15 one-way heavy-duty truck trips per day. The school operates Monday through Friday from 8:00 a.m. to 3:00 p.m. and currently enrolls 60-85 students from Kindergarten to eighth grade and a total of 27 employees. The students are brought to school by 6-7 school buses with 10-12 students per bus, and no more than 10 students are brought to school by individual passenger vehicles per day. No increase in the number of students or employees is anticipated under this request. No additional vehicle or truck trips are anticipated under this request. Total vehicle trips to the school and back are 74 vehicle trips (number of student and teacher vehicle trips to and from the school Monday – Friday), and 14 heavy duty truck trips (buses going to and from the school Monday – Friday). As this is below the District's threshold of significance for vehicle and heavy truck trips, no significant impacts to air quality are anticipated.

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations a project's vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces. No construction is proposed as part of this project. Furthermore, any future construction activities would occur in compliance with all SJVAPCD regulations; therefore, construction emissions would be less than significant without mitigation.

The project was referred to the Air District; however, no response has been received to date.

Potential impacts on local and regional air quality are anticipated to be less than significant, falling below SJVAPCD thresholds, as a result of the nature of the proposed project and project's operation after approval. Implementation of the proposed project would fall below the SJVAPCD significance thresholds for both short-term construction and long-term operational emissions. Because no construction is proposed, and operation of the project would not exceed the SJVAPCD significance thresholds, the proposed project would not increase the frequency or severity of existing air quality standards or the interim emission reductions specified in the air plans.

It appears the project would not be a significant impact to any sensitive receptors.

For these reasons, the proposed project is considered to be consistent with all applicable air quality plans. Also, the proposed project would not conflict with applicable regional plans or policies adopted by agencies with jurisdiction over the project and would be considered to have a less-than significant impact.

Mitigation: None.

References: Application information; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM 10 Synopsis; www.valleyair.org; San Joaquin Valley Air Pollution Control District's Small Project Analysis Level (SPAL) guidance, November 13, 2020; and the Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project is located within the Salida Quad of the California Natural Diversity Database. There are four animals and one insect which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern within the Salida California Natural Diversity Database Quad. These species include the California tiger salamander – central California DPS, Swainson’s hawk, tricolored blackbird, steelhead – Central Valley DPS, and valley elderberry longhorn beetle. There are no reported siting’s of any of the aforementioned species on the project site; however, a Swainson’s hawk nesting site was observed on June 24, 2002, 2± miles west of the project site according to the California Natural Diversity Database. There is a very low likelihood that these species are present on the project site as it has already been developed with the existing school facility and track and field area.

No construction or grading is proposed under this request. No trees will be removed as part of this request.

An early consultation was referred to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and no response was received. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors are considered to be less than significant.

Mitigation: None.

References: Application information; California Department of Fish and Wildlife’s Natural Diversity Database Quad Species List; California Natural Diversity Database, Planning and Community Development GIS, accessed December 2, 2021; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: It does not appear this project will result in significant impacts to any archaeological or cultural resources. The project site is improved with an existing dirt track and field area, approximately 26,000± square-feet of building space for instructional use, as well as two residences, a tool shed and a 3,575± square-foot barn. No new construction is proposed under this request. However, conditions of approval will be placed on the project, requiring that future construction activities shall be halted if any resources are found, until appropriate agencies are contacted and an archaeological survey is completed.

Mitigation: None.

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

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

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

No construction is proposed as part of this request; however, all future construction activities shall be in compliance with all SJVAPCD regulations and with Title 24, Green Building Code, which includes energy efficiency requirements. No lighting is proposed as part of this project. No additional vehicle trips are proposed to be generated as a result of this request.

The project was referred to the Air District; however, the District responded with no comments for the proposed project.

The Modesto Irrigation District provided a referral response and no issues regarding electrical service were identified.

It does not appear that this project will result in significant impacts to the wasteful, inefficient, or unnecessary consumption of energy resources. Accordingly, the potential impacts to Energy are considered to be less than significant.

Mitigation: None.

References: Application information; CEQA Guidelines; Title 16 of County Code; CA Building Code; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County 2016 General Plan EIR; Governor's Office of Planning and Research Technical Advisory, December 2018; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: As mentioned earlier, the USDA Natural Resources Conservation Service’s Eastern Stanislaus County Soil Survey indicates that the property is made up of Dinuba fine sandy loam (DmA) and Hanford sandy loam (HdA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. No structures are proposed under this request; however, any structures resulting from this project will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. An early consultation referral response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project will be required for any building permit that will create a larger or smaller building footprint, subject to Public Works review and Standards and Specifications. Likewise, any addition or expansion of a septic tank or alternative waste water disposal system would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements. No new septic system, or well is proposed under this project. The track and field located on APN 005-030-020 are existing; no grading or leveling are proposed for the project.

The project was referred to the Stanislaus County Department of Environmental Resources who replied with no comments.

The project site is not located near an active fault or within a high earthquake zone. Landslides are not likely due to the flat terrain of the area.

DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. Conditions of approval regarding these standards will be applied to the project and will be triggered should a building or grading permit be requested in the future.

Mitigation: None.

References: Application information; USDA – NRCS Web Soil Survey; California Building Code; Referral response from Stanislaus County Department of Public Works, dated September 16, 2021; Referral response from Stanislaus County Department of Environmental Resources, dated September 30, 2021; Stanislaus County General Plan and Support Documentation¹.

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

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

This project proposes to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field. The school operates Monday through Friday from 8:00 a.m. to 3:00 p.m. and currently enrolls 60-85 students from Kindergarten to eighth grade and a total of 27 employees. Direct emissions of GHGs from the operation of the proposed project are primarily due to passenger vehicle trips and heavy truck trips (buses). Therefore, the project would not result in an increase in direct annual emissions of GHGs during operation as the school facility, dirt track and grassy field are existing and no additional vehicle or heavy truck trips are proposed.

As required by CEQA Guidelines Section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by case basis for evaluation under CEQA. However, the State of California Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The students are brought to school by 6-7 school buses with 10-12 students per bus and no more than 10 students are brought to school by individual passenger vehicles per day. No increase in the number of students or employees is anticipated under this request. No additional vehicle or truck trips are anticipated under this request. Total vehicle trips to the school and back are 74 vehicle trips (number of student and teacher vehicle trips to and from the school), and 14 heavy duty truck trips (6-7 buses going to and from the school) Monday – Friday. The VMT increase associated with the proposed project is less-than significant as the number of vehicle trips will not exceed 110 per-day. As this is below the District's threshold of significance, no significant impacts to air quality related to VMT are anticipated.

No construction is proposed as part of this project. Should future construction occur on the project site, the short-term emissions of GHGs during construction, primarily composed of CO₂, CH₄, and N₂O, would be the result of fuel combustion

by construction equipment and motor vehicles. The other primary GHGs (HFCs, PFCs, and SF6) are typically associated with specific industrial sources and are not expected to be emitted by future construction at this project site. As described above in Section III - Air Quality, the use of heavy-duty construction equipment would be very limited; therefore, the emissions of CO2 from future construction would be less-than significant. Additionally, the construction of any future proposed buildings is subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). Any future construction activities associated with this project are considered to be less-than significant as they are temporary in nature and are subject to meeting SJVAPCD standards for air quality control.

The analysis of mobile source pollution based on SPAL within Section III – Air Quality of this report would apply in regard to Greenhouse Gas Emissions as well. The District’s Small Project Analysis Level (SPAL) guidance identifies thresholds of significance for criteria pollutant emissions, which are based on the District’s New Source Review (NSR) offset requirements for stationary sources. The District’s threshold of significance for school related projects for Junior High Schools with 1,440 students or less, and Elementary schools with 1,880 students or less, is 1,000 one-way vehicle trips for all fleet types per day, or less than 15 one-way heavy-duty truck trips per day. As mentioned above in this section, the proposed project has a total of 14 heavy truck trips (6-7 buses going to and from school) and 74 vehicle trips (number of student and teacher vehicle trips to and from the school) Monday – Friday which is below the District’s threshold of significance for vehicle and heavy truck trips for Junior High and Elementary schools.

This project was referred to the San Joaquin Valley Air Pollution Control District; however, no response has been received to date. Staff will include a condition of approval requiring the applicant to comply with all appropriate District rules and regulations should future construction occur on the project site. Consequently, GHG emissions associated with this project are considered to be less-than significant.

Mitigation: None.

References: Application information; San Joaquin Valley Air Pollution Control District’s Small Project Analysis Level (SPAL) guidance, California Air Pollution Control Officers Association Quantifying Greenhouse Gas Mitigation Measures (August 2010); Stanislaus County General Plan and Support Documentation¹.

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

| | | | | |
|---|--|--|---|--|
| f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | | | X | |
| g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? | | | X | |

Discussion: The County Department of Environmental Resources (DER) is responsible for overseeing hazardous materials. This project was referred to the Department of Environmental Resources – Hazardous Materials Division who responded with no comments for the project. The proposed use is not recognized as a generator and/or consumer of hazardous materials, therefore no significant impacts associated with hazards or hazardous materials are anticipated to occur as a result of the proposed project.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater from drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. The parcels surrounding the project site that are actively being farmed have obtained permits from the Agricultural Commissioner and are subject to the applicable best management practices required by the Agricultural Commissioner. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people. General Plan Amendment No. 2011-01 - *Revised Agricultural Buffers* was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. Appendix A states: “All projects shall incorporate a minimum 150-foot-wide buffer setback. Projects which propose people intensive outdoor activities, such as athletic fields, shall incorporate a minimum 300-foot-wide buffer setback. Alternatives may be approved provided the Planning Commission finds that the alternative provides equal or greater protection than the existing buffer standards. The project proposes an athletic field which is considered to be people intensive and require a 300-foot setback from the proposed use to adjacent agriculturally zoned property. The project site is surrounded by single-family dwellings, ranchettes and walnut and almond orchards in all directions. The nearest parcels in agricultural production are adjacent to the north and east, with the adjacent parcel to the north being enrolled in a Williamson Act contract. The adjacent parcels to the south are not in agricultural production. Parcels to the west and south of the project site are actively farmed and enrolled in Williamson Act contracts; however, the parcels are separated from the project site by Finney Road to the west, and North Avenue to the south. The existing track and field are within the 300-foot agricultural buffer from the properties adjacent to the north and east. The existing school facility was permitted prior to the Agricultural Buffer policy and the majority of the existing school facility is located within the 300-foot buffer area from adjacent agriculturally zoned properties in all directions. The applicant has proposed a 0-foot buffer and a 6-foot tall slatted chain link fence along the north and east property lines of APN 005-030-020, as an alternative from the County’s Agricultural Buffer requirement. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. Groups of 10-15 students at a time will use the track and field throughout the day from 8:00 a.m. to 3:00 p.m., Monday-Friday. No new construction of buildings, or bleachers within the 300-foot buffer area are being proposed.

The project was referred to the Stanislaus County Agricultural Commissioner who replied with no concerns for the proposed project.

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

The project site is not within the vicinity of any airstrip or wildlands.

No significant impacts associated with hazards or hazardous materials are anticipated to occur as a result of the proposed project.

Mitigation: None.

References: Referral response received from Stanislaus County Department of Environmental Resources – Hazardous Materials Division, dated September 22, 2021; Application information; Referral response received from Stanislaus County Environmental Resources Committee, dated September 27, 2021; Email received from the Stanislaus County Office of the Agricultural Commissioner and Sealer of Weights and Measures, dated December 3, 2021; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The existing school is served by private septic system and well, and receives irrigation water from Modesto Irrigation District. This is a request to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field. No construction or increase in the number of students or employees is proposed. Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2% annual chance floodplains. All flood zone requirements will be addressed by the Building Permits Division during the building permit process.

The project proposes to utilize an existing well and to maintain stormwater runoff on-site through overland drainage. The project is not expected to significantly impact water quality, groundwater supplies, or groundwater recharge. The existing dirt track and field are located on APN 005-030-020; the land is topographically flat. No grading or leveling are proposed under the current request. The current absorption patterns of water upon this property are not expected to be altered; however, current standards require that all of a project’s storm water be maintained on-site and, as such, a Grading and Drainage Plan, as requested by the Department of Public Works, shall be submitted with any building permit for the project site that will create a larger or smaller building footprint. This request will be included as a condition of approval for the project should construction occur onsite in the future. Additionally, any future construction will be reviewed under the Building Permit process and must be reviewed and approved by DER and adhere to current Local Agency Management Program (LAMP) standards. LAMP standards include minimum setback from wells to prevent negative impacts to groundwater quality. No expansion to the existing septic systems, new septic systems or additional wells are proposed as

a part of this project. However, any future proposals for new wells will be subject to review under the County's Well Permitting Program, which will determine whether a new well will require environmental review.

The Sustainable Groundwater Management Act (SGMA) was passed in 2014 with the goal of ensuring the long-term sustainable management of California's groundwater resources. SGMA requires agencies throughout California to meet certain requirements including forming Groundwater Sustainability Agencies (GSA), developing Groundwater Sustainability Plans (GSP), and achieving balanced groundwater levels within 20 years. Public and private water agencies and user groups within each of the four groundwater subbasins underlying the County work together as GSAs to implement SGMA. DER is a participating member in five GSAs. The site is located in the Stanislaus and Tuolumne Rivers Groundwater Basin Association (STRGBA) GSA which is a part of the Modesto Sub-basin. The Stanislaus and Tuolumne Rivers Groundwater Basin (STRGBA) GSA is composed of seven agencies within the Modesto Sub-basin who are collaboratively developing one GSP under the Stanislaus and Tuolumne Rivers Groundwater Basin Association GSA. SGMA requires the Modesto Sub-basin to adopt and begin implementation of a GSP by January 31, 2022.

Groundwater management in Stanislaus County is also regulated under the County Groundwater Ordinance, adopted in 2014. The Groundwater Ordinance is aligned with SGMA in its objective to prevent "undesirable results". To this end, the Groundwater Ordinance requires that applications for new wells that are not exempt from the Ordinance are accompanied by substantial evidence that operation of the new well will not result in unsustainable groundwater extraction. Further, for unincorporated areas covered in an adopted GSP pursuant to SGMA, the County can require holders of permits for wells it reasonably concludes are withdrawing groundwater unsustainably to provide substantial evidence that continued operation of such wells does not constitute unsustainable extraction and has the authority to regulate future groundwater extraction.

In addition to GSPs and the Groundwater Ordinance, the County General Plan includes goals, policies, and implementation measures focused on protecting groundwater resources. Projects with a potential to affect groundwater recharge or that involve the construction of new wells are referred to the DER for review. The DER evaluates these projects for compliance with the County Groundwater Ordinance and refers projects to the applicable GSAs for determination whether or not they are compliance with an approved GSP.

If a new well were required in the future, the drilling of a new well would be regulated by the County's Groundwater Ordinance and thus require CEQA-compliance. If in the future the facility results in the formation of a new Public Water System, then the project site will be subject to all applicable rules, regulations and standards as discussed below.

The California Safe Drinking Water Act (CA Health and Safety Code Section 116275(h)) defines a Public Water System (PWS) as a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year. A public water system includes the following:

- (1) Any collection, treatment, storage, and distribution facilities under control of the operator of the system that are used primarily in connection with the system.
- (2) Any collection or pretreatment storage facilities not under the control of the operator that are used primarily in connection with the system.
- (3) Any water system that treats water on behalf of one or more public water systems for the purpose of rendering it safe for human consumption.

The current school facility is considered to be a Public Water System (PWS) and is classified as a Non-Transient Non-Community Water System (NTNCWS) which is a PWS that regularly supplies water to at least 25 of the same people at least six months per year. The PWS for the school is listed under the system name of Wood Colony Christian School and is currently active. A referral response was received from the Department of Environmental Resources who responded with no comment.

A referral response was received from the Environmental Review Committee regarding the proposed project and no comments or concerns were identified regarding groundwater resources. The project was also referred to the Regional Water Quality Control Board (RWQCB) and no response has been received to date.

The project was referred to the Modesto Irrigation District (MID); no comments regarding domestic water related to the project were received from the District.

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

Mitigation: None.

References: Application information; Referral response from Stanislaus County Public Works Department, dated September 16, 2021; Referral response from Stanislaus County Environmental Review Committee, dated September 27, 2021; Stanislaus and Tuolumne Rivers Groundwater Basin Association (STRGBA) GSA; Referral response from Stanislaus County Department of Environmental Resources, dated September 30, 2021; Environmental Protection Agency, Information about Public Water Systems, <https://www.epa.gov/dwreginfo/information-about-public-water-systems>, accessed on December 8, 2021; Referral response from Modesto Irrigation District, dated October 20, 2021; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project site is designated Agriculture by the Stanislaus County General Plan land use diagrams and zoned General Agriculture (A-2-40). This is a request to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field in the A-2-40 zoning district. The existing track and field did not receive appropriate land use entitlements prior to establishment. As such, a use permit is required to amend the boundaries for the school located on Assessor Parcel Number (APN) 005-030-035 and permit the existing track and field currently located on the eastern portion of APN 005-030-020, to the north of the school facility. The existing school was permitted under Use Permit 79-85 – Brethren Heritage School for temporary instruction of 150 students. Subsequently, the permit was amended under a time extension in 1982, to allow for 250 students and a permanent school facility. The project site is currently developed with approximately 26,000± square-feet of building space for instructional use; two residences; a tool shed; a 3,575± square-foot barn; three parking areas consisting of 59 standard spaces and 2 accessible space; and 1± acre area consisting of a basketball court and baseball field. The project site is landscaped with mature deciduous and evergreen trees along the road frontage, and adjacent to the instructional buildings and residences. On-site lighting for the existing school facility consists of fifty-five exterior wall fixtures on the existing buildings, and five pole-lighting fixtures approximately 18-20 feet in height. The 2± acre area for the existing track is currently developed with a 24-foot wide track composed of hard packed dirt and encircles a 1.3± acre field. The incorporation of the track and field for the existing school is not expected to perpetuate any significant conversion of farmland to non-agricultural as the track and field are existing, and can be easily returned to agricultural production. If approved, a Lot Line Adjustment (LLA) application will be made a condition of approval for the proposed project and processed following the expansion request, to maintain the use on one parcel. No construction or additional lighting or landscaping is proposed under this request.

The proposed expansion of the school is considered a Tier Three use, which are those uses that may not directly be related to agriculture but may be necessary to serve the A-2 district or may be difficult to locate in an urban area.

Tier three uses may be allowed when the planning commission finds that:

1. The establishment, maintenance and operation of the proposed use or building applied for is consistent with the general plan and will not, under the circumstances of the particular case, be detrimental to the health, safety and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county.

2. The use as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity; and
3. The parcel on which such use is requested is not located in one of the county's "most productive agricultural areas," as that term is used in the agricultural element of the general plan; or the character of the use that is requested is such that the land may reasonably be returned to agricultural use in the future.

The project site is not located in one of the most productive agricultural areas of the County. In determining most productive agricultural areas, factors to be considered include but are not limited to soil types and potential for agricultural production; the availability of irrigation water; and the existence of Williamson Act contracts. The project site is comprised of grade 1 soils with Storie index ratings of 93 and 90 which are considered to be prime farmland. However, according to Goal Two, Policy 2.5, Implementation Measure 1, of the General Plan's Agricultural Element, when defining the County's most productive agricultural areas, it is important to recognize that soil types alone should not be the determining factor. Although soil types should be considered, the designation of "most productive agricultural areas" also should be based on existing uses and their contributions to the agricultural sector of our economy. The 7± acre project site is currently developed with a school facility and residential uses on APN 005-030-035, and the dirt track and grassy field on APN 005-030-020. The existing baseball field and track and field areas of the project site are classified as "Prime Farmland" by the California Department of Conservation's Farmland Mapping and Monitoring Program; however, the project site developed with the school facility is classified as "Urban and Built-up Land." The 7± acre project site is not enrolled under the Williamson Act, and is not currently being used for agricultural production. Based on this information the project site will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use and will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use as the existing project site is already developed with non-agricultural uses and the track and field can easily be returned to farmland.

In December of 2007, Stanislaus County adopted an updated Agricultural Element which incorporated guidelines for the implementation of agricultural buffers applicable to new and expanding non-agricultural uses within or adjacent to the A-2 Zoning District. Appendix A states: "All projects shall incorporate a minimum 150-foot-wide buffer setback. Projects which propose people intensive outdoor activities, such as athletic fields, shall incorporate a minimum 300-foot-wide buffer setback. The purpose of these guidelines is to protect the long-term health of agriculture by minimizing conflicts such as spray-drift and trespassing resulting from the interaction of agricultural and non-agricultural uses. Alternatives may be approved provided the Planning Commission finds that the alternative provides equal or greater protection than the existing buffer standards. The project proposes an athletic field which is considered to be people intensive and require a 300-foot setback from the proposed use to adjacent agriculturally zoned property. The nearest parcels in agricultural production are adjacent to the north and east, with the adjacent parcel to the north being enrolled in a Williamson Act contract. The adjacent parcels to the south are not in agricultural production. Parcels to the west and south of the project site are actively farmed and enrolled in Williamson Act contracts; however, the parcels are separated from the project site by Finney Road to the west, and North Avenue to the south. The existing track and field are within the 300-foot agricultural buffer from the properties adjacent to the north and east. The existing school facility was permitted prior to the Agricultural Buffer policy and the majority of the existing school facility is located within the 300-foot buffer area from adjacent agriculturally zoned properties in all directions. The applicant has proposed a 0-foot buffer and a 6-foot tall slatted chain link fence along the north and east property lines of APN 005-030-020, as an alternative from the County's Agricultural Buffer requirement. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. Groups of 10-15 students at a time will use the track and field throughout the day from 8:00 a.m. to 3:00 p.m., Monday-Friday. No new construction of buildings, or bleachers within the 300-foot buffer area are being proposed.

The project was presented to the Wood Colony Municipal Advisory Council (MAC) on October 13, 2021 as an Early Consultation referral. At the meeting, the Wood Colony MAC expressed concerns over parents parking along the side of Finney Road and North Avenue when picking up students, or for school events. To address the neighborhood concerns, the Planning Department will place a condition of approval on the project requiring the property owner to submit a written "Good Neighbor Policy" to be reviewed and approved by the Planning Department prior to operation of the track and field. The policy will establish a plan to provide neighbors with contact information for the school and steps the operation will take to work diligently with the neighbors to address any on-street parking issues.

The project was referred to the Stanislaus County Agricultural Commissioner who replied with no concerns for the proposed project.

The current school facility is considered to be a Public Water System (PWS) and is classified as a Non-Transient Non-Community Water System (NTNCWS) which is a PWS that regularly supplies water to at least 25 of the same people at least six months per year. The PWS for the school is listed under the system name of Wood Colony Christian School and is currently active. A referral response was received from the Department of Environmental Resources who responded with no comment.

The project will not physically divide an established community nor conflict with any habitat conservation plans.

With the application of conditions of approval, there is no indication that, under the circumstances of this particular case, the proposed operation will be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use or that it will be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.

Mitigation: None.

References: Application information; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Email received from the Stanislaus County Office of the Agricultural Commissioner and Sealer of Weights and Measures, dated December 3, 2021; Referral response from Stanislaus County Department of Environmental Resources, dated September 30, 2021; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation¹.

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

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

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The Stanislaus County General Plan identifies noise levels up to 65 dB Ldn (or CNEL) as the normally acceptable level of noise for school uses. Operating hours are limited to Monday through Friday from 8:00 a.m. to 3:00 p.m. The track and field will only be used in conjunction with the school during normal hours of operation; no public use is proposed. No construction is proposed as part of this project. Should future construction occur, on-site grading and constructing resulting from future projects may result in a temporary increase in the area’s ambient noise levels; however, noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise. Conditions of approval will be placed on the project to ensure compliance with the General Plan’s Noise Element and Chapter 10.46 of the County Code – Noise Control.

The site is not located within an airport land use plan. Noise impacts associated with the proposed project are considered to be less-than significant.

Mitigation: None.

References: Application information; Stanislaus County Noise Control Ordinance (Title 10); Stanislaus County General Plan, Chapter IV – Noise Element, and Support Documentation¹.

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

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

Mitigation: None.

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

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

Discussion: The County has adopted Public Facilities Fees, as well as Fire Facility Fees on behalf of the appropriate fire district, to address impacts to public services. No construction is proposed as part of this project. However, should any construction occur on the property in the future, all adopted public facility fees will be required to be paid at the time of building permit issuance.

The project site is located within Modesto Irrigation District (MID) boundaries. The project was referred to MID who responded with comments regarding the protection and relocation of existing electrical lines, cables and easements, and safety measures requiring the contractor verify actual depth and location of all underground utilities prior to start of construction and notify the appropriate agencies prior to any earth moving activities for any applicable rules or regulations. MID also commented on an existing 36-inch private concrete pipeline that lies along the east property line of APN 005 030-020 and 005-030-035. Prior to development, the applicant/property owner must contact Irrigation Field Services to update their irrigation billing account to reflect the changes to the parcel currently developed with the school (APN 005 030-035). The applicant/property owner should consult with affected landowners to discuss potential improvement plans if the pipeline/existing private infrastructure will be affected by the proposed project. If the pipeline is impacted or altered, the pipeline must be upgraded, replaced or relocated as required by the pipeline owner. No construction or grading is proposed as part of this project; however, MID’s comments regarding electricity and irrigation for the project site will be placed on the project as conditions of approval.

The project was referred to the appropriate public service agencies, as well as the Stanislaus County Environmental Review Committee (ERC), who responded with no comments.

The Hetch-Hetchy Right-of-Way is located .15± miles to the south of the project site. The project was referred to the San Francisco Public Utilities Commission – Hetch-Hetchy Water and Power; however, no response has been received to date.

This project was circulated to all applicable school, fire, police, and public works departments and districts during the early consultation referral period and no concerns were identified with regard to public services.

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

Mitigation: None.

References: Application information; Referral response from Modesto Irrigation District, dated October 20, 2021; Referral response from Stanislaus County Environmental Review Committee, dated September 27, 2021; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: This project will not increase demands for recreational facilities, as such impacts typically are associated with residential development.

Mitigation: None.

References: Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The project proposes to expand the area of an existing private school facility from 5± acres to 7± acres by incorporating a 2± acre area for a track and soccer field. The school operates Monday through Friday from 8:00 a.m. to 3:00 p.m. and currently enrolls 60-85 students from Kindergarten to eighth grade and a total of 27 employees.

As required by CEQA Guidelines Section 15064.3, potential impacts to transportation should be evaluated using Vehicle Miles Traveled (VMT). Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. The CEQA Guidelines identify vehicle miles traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as the most appropriate measure of transportation impacts. According to the same technical advisory from OPR, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less-than significant transportation impact. The students are brought to school by 6-7 school buses with 10-12 students per bus, and no more than 10 students are brought to school by individual passenger vehicles per day. No increase in the number of students or employees is anticipated under this request. No additional vehicle or truck trips are anticipated under this request. Total vehicle trips to the school and back are 74 vehicle trips (number of student and teacher vehicle trips to and from the school), and 14 heavy duty truck trips (6-7 buses going to and from the school) Monday – Friday. The VMT increase associated with the proposed project is less-than significant as the number of vehicle trips will not exceed 110 per-day. As this is below the District’s threshold of significance, no significant impacts to air quality are anticipated.

The project was presented to the Wood Colony Municipal Advisory Council (MAC) on October 13, 2021 as an Early Consultation referral. At the meeting, the Wood Colony MAC expressed concerns over parents parking along the side of Finney Road and North Avenue, when picking up students and for school events. To address the neighborhood concerns, the Planning Department will place a condition of approval on the project requiring the property owner to submit a written “Good Neighbor Policy” to be reviewed and approved by the Planning Department prior to operation of the track and field. The policy will establish a plan to provide neighbors with contact information for the school and steps the operation will take to work diligently with the neighbors to address any on-street parking issues.

The project will receive access via Finney Road, a County-maintained road identified as a 60-foot wide Local Road. It is not anticipated that the project would substantially affect the level of service on Finney Road. The project was referred to Public Works, which did not respond with any traffic related comments. Public Works did request the remaining right-of-way Chord for the intersection at Finney Road and North Avenue be dedicated as an irrevocable offer of dedication (IOD). Public Works’ comment will be added to the project as a condition of approval. No construction is proposed; however, future onsite development may be required to pay applicable County PFF fees, which will be utilized for maintenance and traffic congestion improvements to all County roadways.

The proposed project is not anticipated to conflict with any transportation program, plan, ordinance or policy.

Mitigation: None.

References: Application information; Governor’s Office of Planning and Research Technical Advisory, December 2018; Referral response from Stanislaus County Department of Public Works, dated September 16, 2021; Stanislaus County General Plan and Support Documentation¹.

| XVIII. TRIBAL CULTURAL RESOURCES -- Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Included | Less Than Significant Impact | No Impact |
|---|--------------------------------|--|------------------------------|-----------|
| a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California native American tribe, and that is: | | | X | |
| i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | | | X | |
| ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for the in subdivision (c) of Public Resource Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | | | X | |

Discussion: It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project site consists of approximately 26,000± square-feet of building space for instructional use; two residences; a tool shed; a 3,575± square-foot barn; three parking areas; and 1± acre area consisting of a basketball court and baseball field. In accordance with SB 18 and AB 52, this project was not referred to the tribes listed with the Native American Heritage Commission (NAHC) as the project is not a General Plan Amendment and no tribes have requested consultation or project referral noticing. No construction is proposed; however, a condition of approval regarding the discovery of cultural resources during any future construction process will be added to the project.

Mitigation: None.

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

| XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project: | Potentially Significant Impact | Less Than Significant With Mitigation Included | Less Than Significant Impact | No Impact |
|--|--------------------------------|--|------------------------------|-----------|
| a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? | | | X | |
| b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? | | | X | |
| c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | | | X | |

| | | | | |
|---|--|--|---|--|
| d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? | | | X | |
| e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? | | | X | |

Discussion: Limitations on providing services have not been identified. The project proposes to utilize the existing Wood Colony Christian School Public Water System and on-site stormwater drainage and capture, and existing septic facilities. No construction is proposed for this project; however, any intensity of these utilities will be subject to regulatory requirements during the building permitting phase should future construction occur. A referral response received from the Department of Public Works indicated that a grading, drainage, and erosion/sediment control plan for the project will be required for any building permit that will create a larger or smaller building footprint, subject to Public Works review and Standards and Specifications. The track and field located on APN 005-030-020 are existing; no grading or leveling are proposed under this request.

The current school facility is considered to be a Public Water System (PWS) and is classified as a Non-Transient Non-Community Water System (NTNCWS) which is a PWS that regularly supplies water to at least 25 of the same people at least six months per year. The PWS for the school is listed under the system name of Wood Colony Christian School and is currently active. A referral response was received from the Department of Environmental Resources who responded with no comment. There are no additional wells or septic systems are proposed as part of this request. If in the future the facility results in the formation of a new Public Water System, then the project site will be subject to all applicable rules, regulations and standards as discussed above in the Hydrology and Water Quality Section of this document.

The project was referred to the Stanislaus County Department of Environmental Resources who replied with no comment for the project.

The project site receives irrigation water from the Modesto Irrigation District (MID). As stated previously in the “Public Services” section, MID provided a response requiring the protection and relocation of existing electrical lines, cables and easements, and safety measures requiring the contractor verify actual depth and location of all underground utilities prior to start of construction and notify the appropriate agencies prior to any earth moving activities for any applicable rules or regulations. MID also commented on an existing 36-inch private concrete pipeline that lies along the east property line of APN 005-030-020 and 005-030-035. Prior to development, the applicant/property owner must contact Irrigation Field Services to update their irrigation billing account to reflect the changes to the parcel currently developed with the school (APN 005 030-035). The applicant/property owner should consult with affected landowners to discuss potential improvement plans if the pipeline/existing private infrastructure will be affected by the proposed project. If the pipeline is impacted or altered, the pipeline must be upgraded, replaced or relocated as required by the pipeline owner. No construction or grading is proposed as part of this project; however, MID’s comments regarding electricity and irrigation for the project site will be placed on the project as conditions of approval should future construction occur.

The Hetch-Hetchy Right-of-Way is located .15± miles to the south of the project site. The project was referred to the San Francisco Public Utilities Commission – Hetch-Hetchy Water and Power; however, no response has been received to date.

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

Mitigation: None.

References: Application information; Referral response received from Stanislaus County Department of Public Works, dated September 16, 2021; Referral response received from Stanislaus County Department of Environmental Resources, dated September 30, 2021; Referral response received from Modesto Irrigation District, dated October 20, 2021; Stanislaus County General Plan and Support Documentation¹.

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

Discussion: The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The terrain of the site is relatively flat, and the site has access to a County maintained road. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Salida Protection District. The project was referred to the District, and no comments have been received to date. California Building and Fire Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and burning embers. No construction is proposed as part of this project. Should future construction occur, building permits are reviewed by the County’s Building Permits Division and Fire Prevention Bureau to ensure all State of California Building and Fire Code requirements are met prior to construction. Wildfire risk and risks associated with postfire land changes are considered to be less-than significant.

Mitigation: None.

References: Application information; California Fire Code Title 24, Part 9; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation¹.

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

| | | | | |
|---|--|--|---|--|
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | | | X | |
|---|--|--|---|--|

Discussion: The 7± acre project site is designated Agriculture by the Stanislaus County General Plan land use diagrams and zoned A-2-40 (General Agriculture). The property is primary comprised of grade 1 soils with Storie index ratings of 93 and 90 which are considered to be prime farmland. The existing baseball field and track and field areas of the project site are classified as “Prime Farmland” by the California Department of Conservation’s Farmland Mapping and Monitoring Program; however, the project site developed with the school facility is classified as “Urban and Built-up Land.” The 7± acre project site is not enrolled under the Williamson Act, and is not currently being used for agricultural production. Based on this information the project site will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use and will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use as the existing project site is already developed with non-agricultural uses and the track and field can easily be returned to farmland.

The surrounding area consists of single-family dwellings, ranchettes and walnut and almond orchards in all directions. Hetch-Hetchy right-of-way is to the south of the project site and Modesto Irrigation District Lateral No. 7 is to the west. The proposed project site expansion to include the existing dirt track and grassy field will be accessory to the permitted use of the school and will not be used for the general public. The expanded project site consisting of the track and grassy field, may reasonably be returned to agricultural use in the future.

Any development of the surrounding parcels would be subject to the permitted uses included in the A-2 Zoning Ordinance or would require additional land use entitlements and environmental review. Rezoning parcels to another designation that would create islands or disregard infilling are not consistent with the General Plan and would likely not be approved. Accordingly, development of the subject parcel would not set a precedent for further development of the surrounding area. Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.






References: Initial Study; Stanislaus County General Plan and Support Documentation¹.

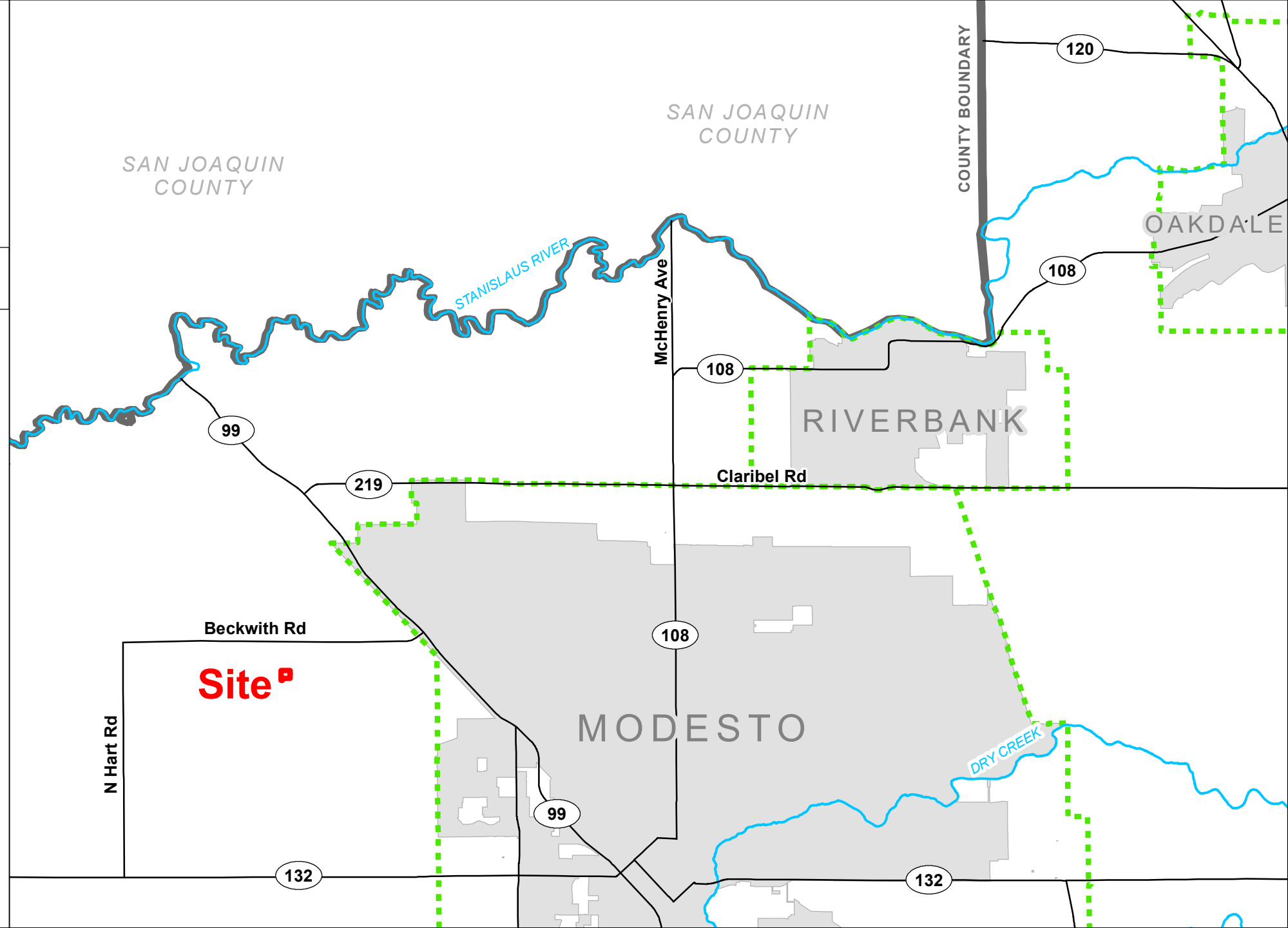
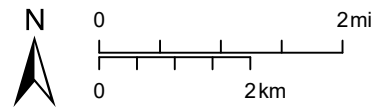
¹Stanislaus County General Plan and Support Documentation adopted in August 23, 2016, as amended. **Housing Element** adopted on April 5, 2016.

WOOD COLONY CHRISTIAN SCHOOL UP PLN2021-0068

AREA MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  City
-  Road
-  River

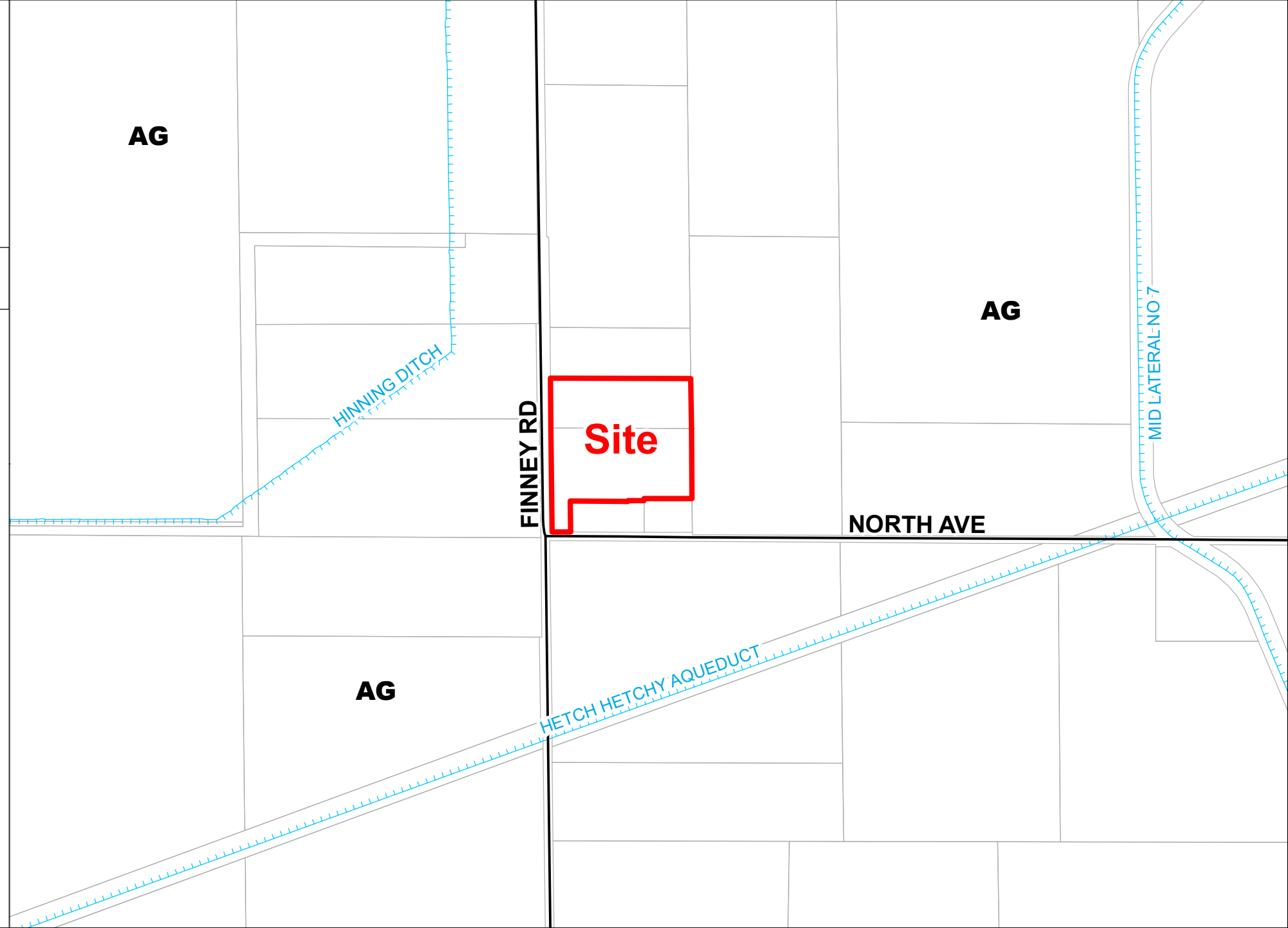
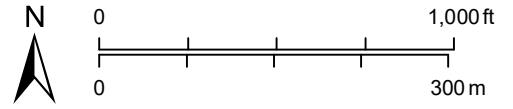


WOOD COLONY CHRISTIAN SCHOOL UP PLN2021-0068

GENERAL PLAN MAP

LEGEND

-  Project Site
-  Parcel
-  Road
-  Canal
- General Plan**
-  Agriculture







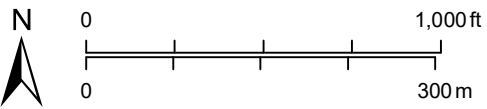
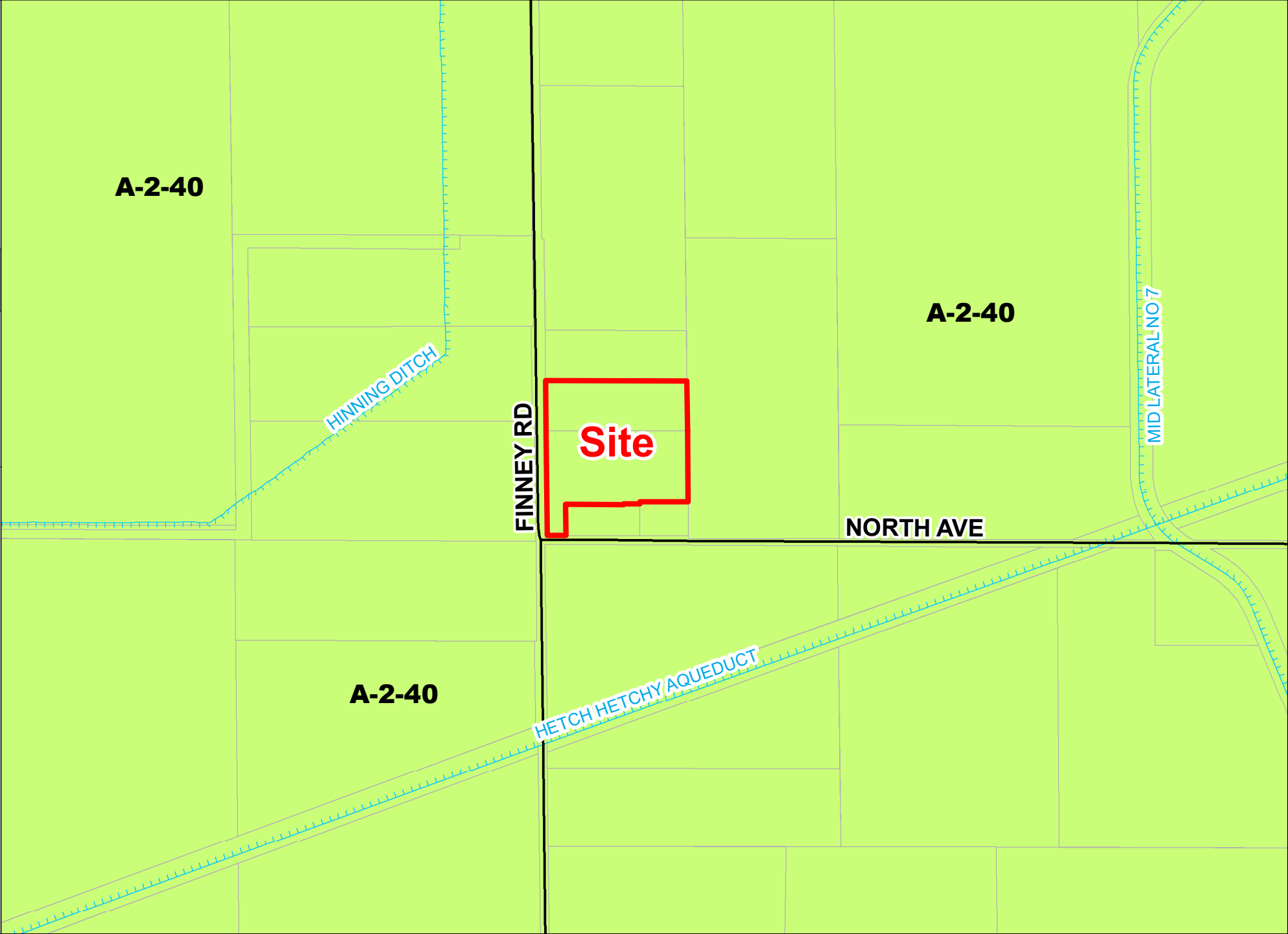
WOOD COLONY CHRISTIAN SCHOOL

UP
PLN2021-0068

ZONING MAP

LEGEND





-  Project Site
-  Parcel
-  Road
-  Canal
- Zoning Designation**
-  General Agriculture 40 Acre

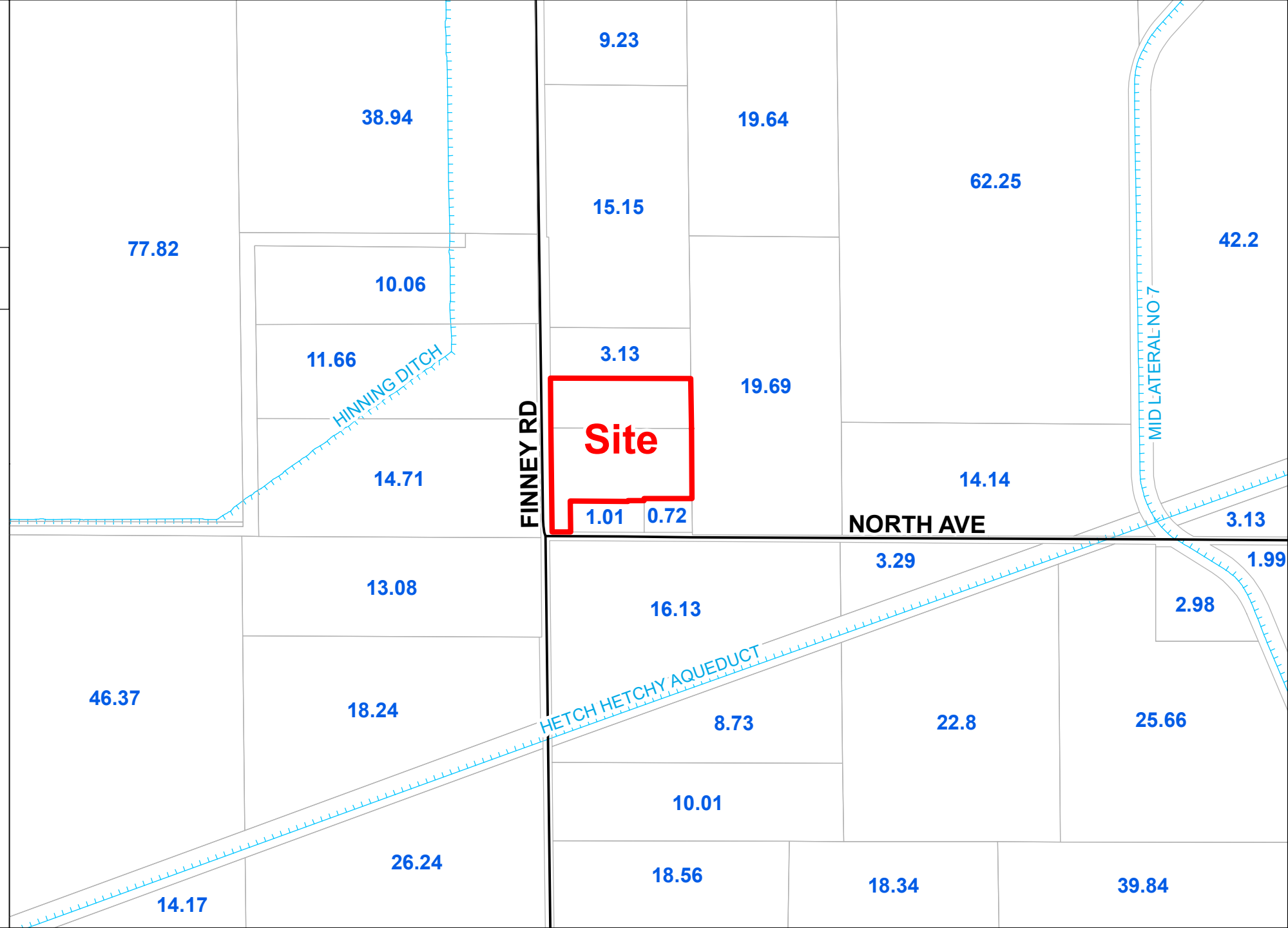
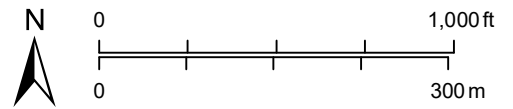


WOOD COLONY CHRISTIAN SCHOOL UP PLN2021-0068

ACREAGE MAP




LEGEND

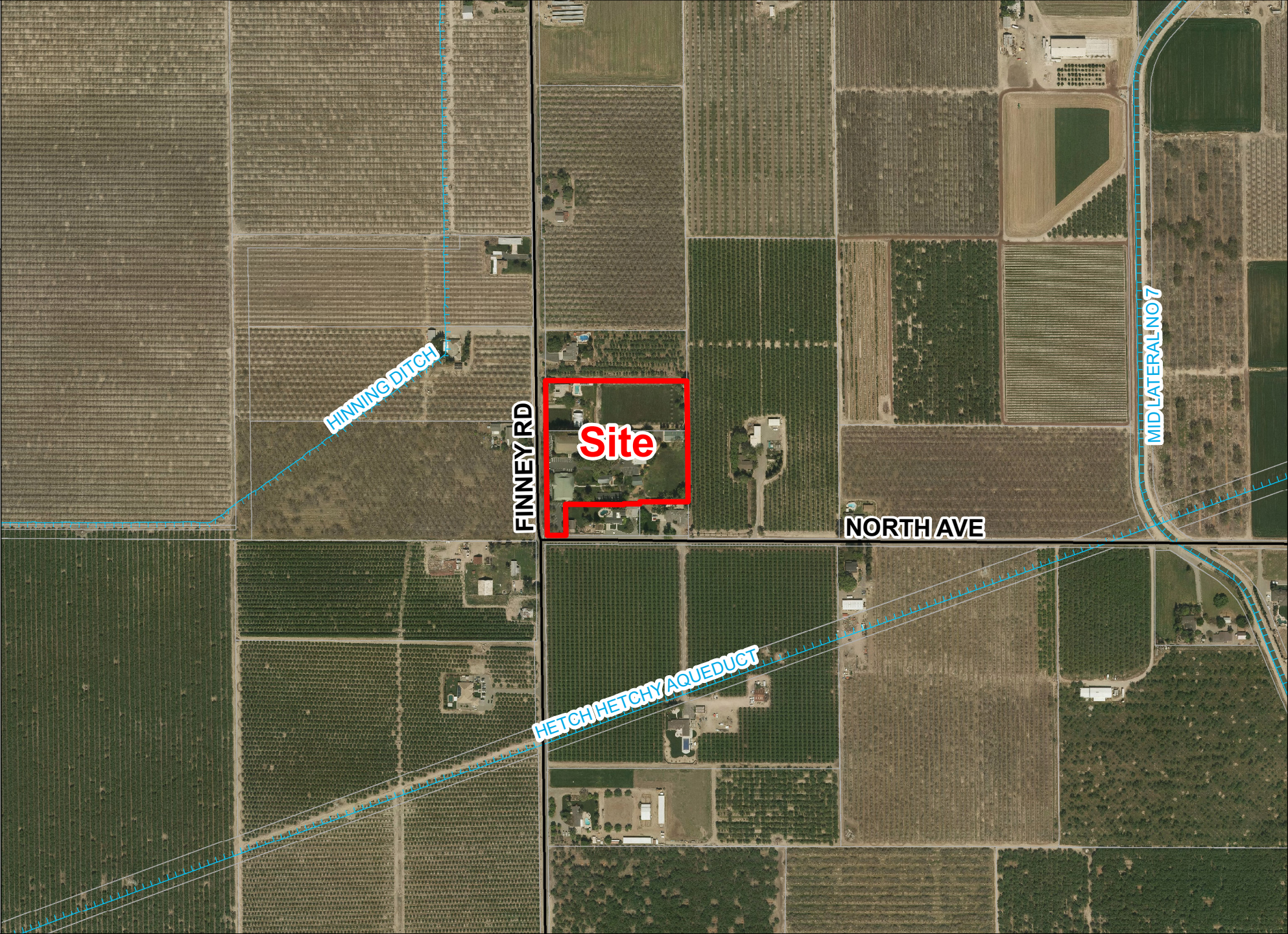
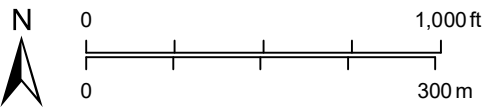
-  Project Site
-  Parcel/Acres
-  Road
-  Canal



WOOD COLONY CHRISTIAN SCHOOL UP PLN2021-0068

2017 AERIAL AREA MAP




- LEGEND**
-  Project Site
 -  Road
 -  Canal

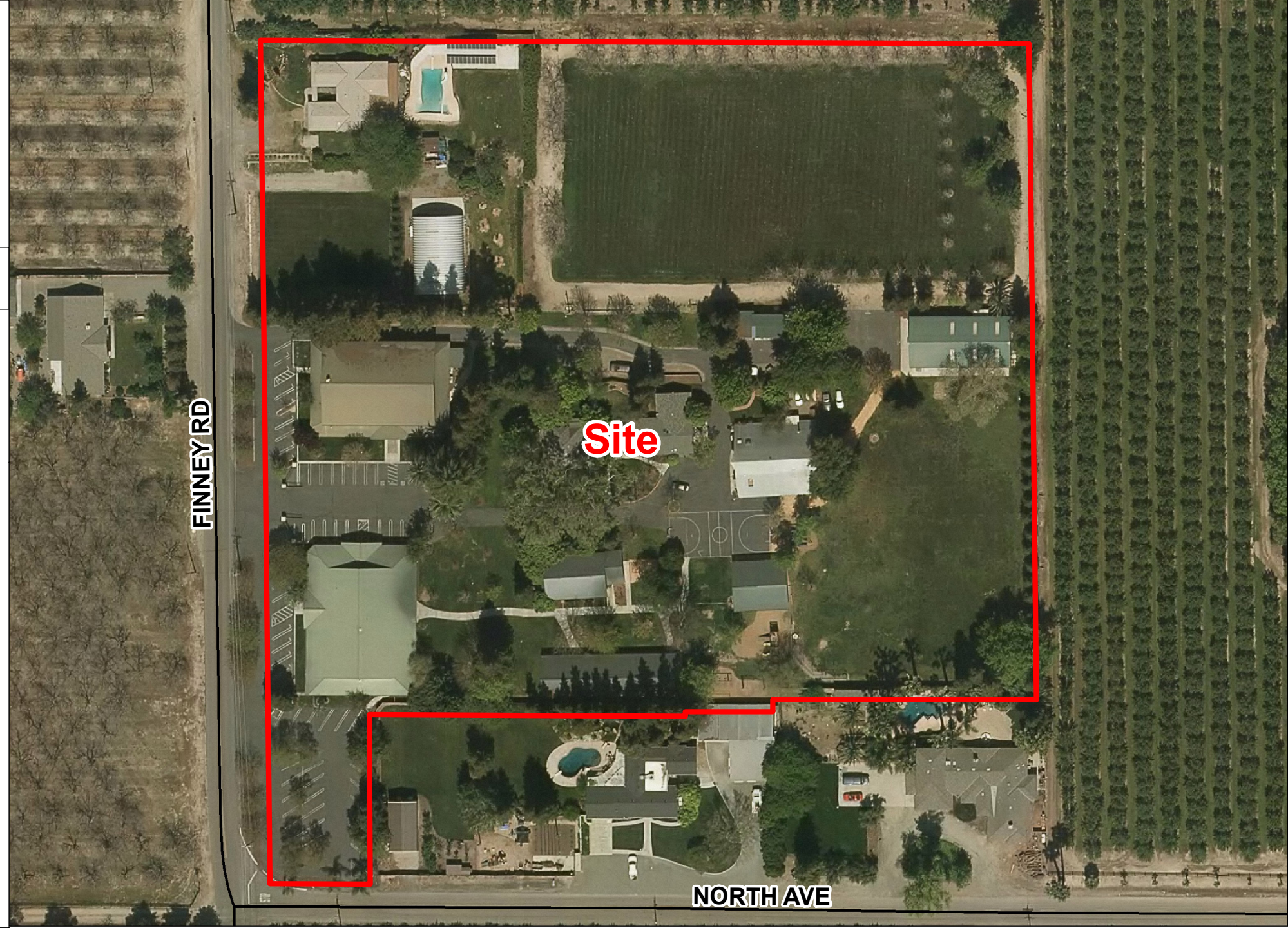
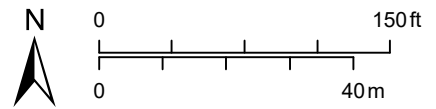


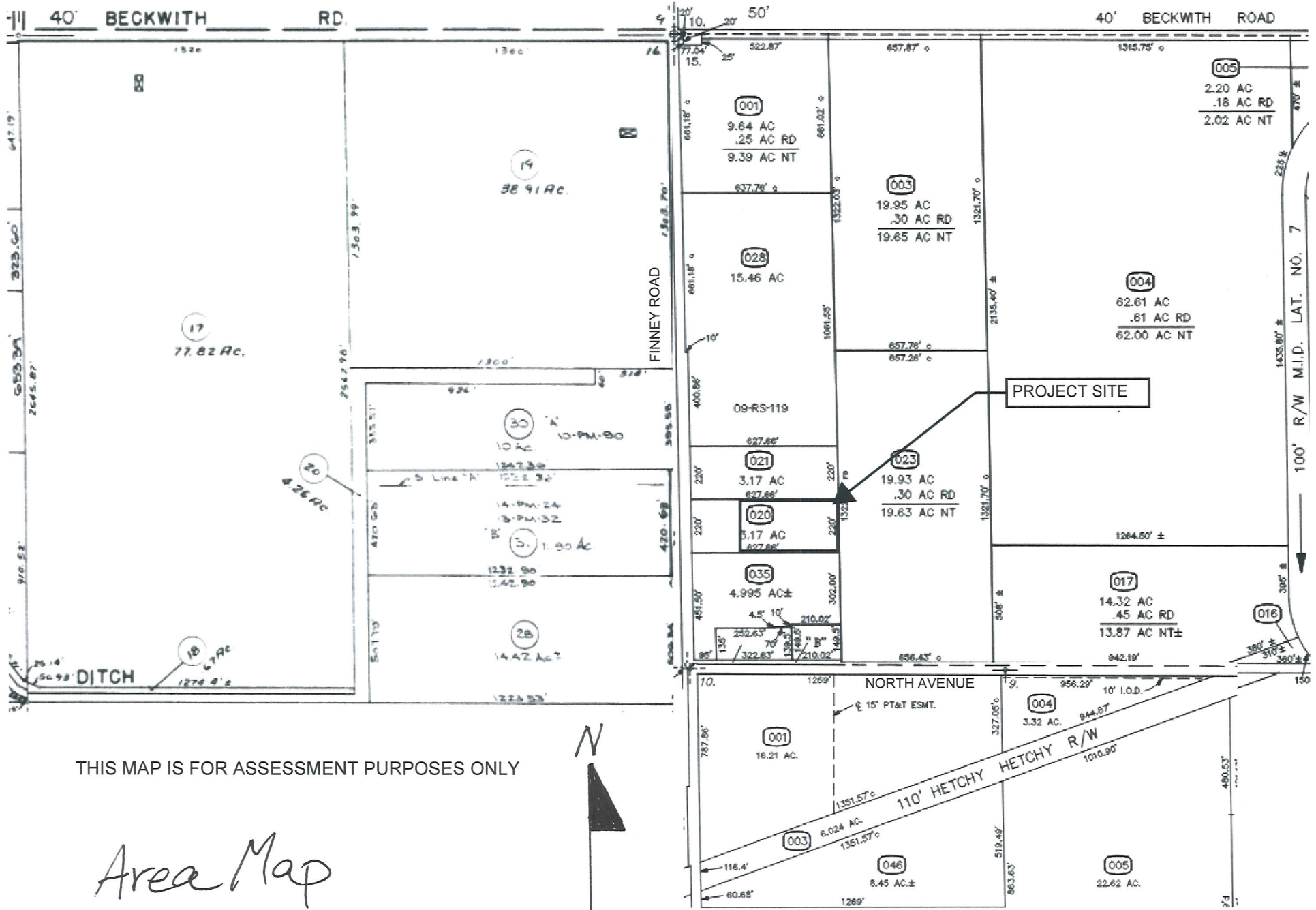
WOOD COLONY CHRISTIAN SCHOOL UP PLN2021-0068

2017 AERIAL SITE MAP

LEGEND

-  Project Site
-  Road
-  Canal

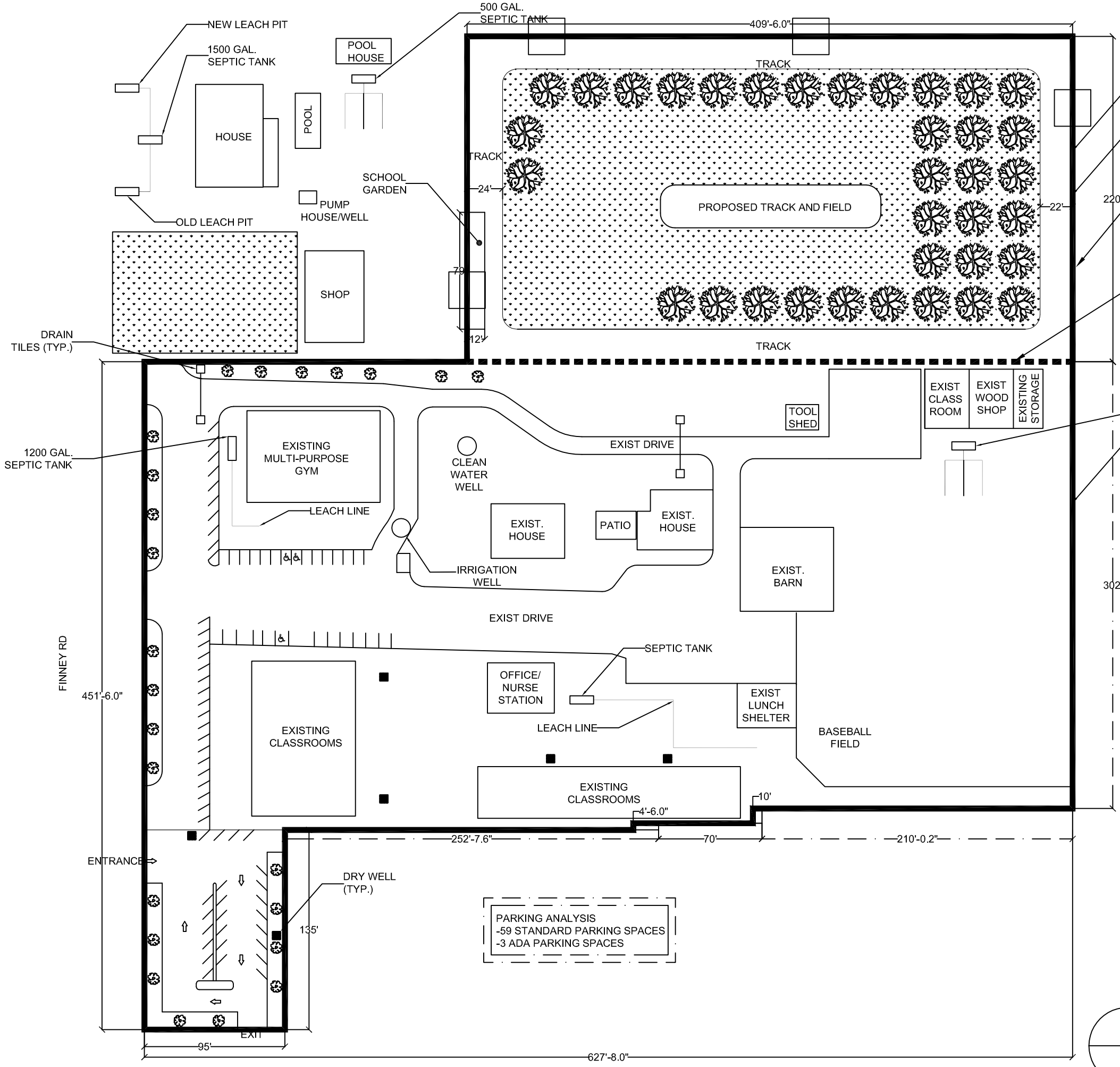




THIS MAP IS FOR ASSESSMENT PURPOSES ONLY

Area Map





RAISED PERIMETER PROPERTY LINES HOLDS APPROX 4"-6" OF WATER

PROPOSED FENCING

220'

PROPOSED LOT LINE

EXISTING LOT LINE

1200 GAL. SEPTIC TANK

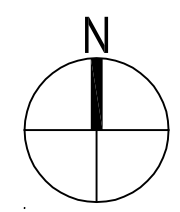
EXISTING LOT LINE

302'

FINNEY RD

451'-6.0"

PARKING ANALYSIS
 -59 STANDARD PARKING SPACES
 -3 ADA PARKING SPACES



WOOD COLONY CHRISTIAN SCHOOL INC.
 2530 FINNEY ROAD

SCALE: N.T.S | DATE: DECEMBER 5, 2021

DRAWN BY: RLH