

STANISLAUS COUNTY PLANNING COMMISSION

February 15, 2024

STAFF REPORT

GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2023-0031 SECURED SPACE SELF STORAGE

REQUEST: TO AMEND THE COMMUNITY PLAN DESIGNATION FROM MEDIUM-DENSITY RESIDENTIAL TO COMMERCIAL AND THE ZONING DESIGNATION FROM GENERAL AGRICULTURE (A-2-10) TO PLANNED DEVELOPMENT (P-D) TO ALLOW FOR THE OPERATION OF AN EXISTING MINI-STORAGE FACILITY ON A 4.67± ACRE PARCEL.

APPLICATION INFORMATION

Applicant/Property Owner:	Sakshi Enterprise, LLC., Biren Patel
Location:	5024, 5028, and 5030 Rohde Road, between Esmar and Faith Home Roads, in the Keyes area.
Section, Township, Range:	24-4-9
Supervisory District:	Five (Supervisor Channce Condit)
Assessor's Parcel Number:	041-059-001 and -002
Referrals:	See Exhibit H Environmental Review Referrals
Area of Parcel(s):	4.67 acres
Water Supply:	Keyes Community Services District
Sewage Disposal:	Keyes Community Services District
General Plan Designation:	Planned Development
Community Plan Designation:	Medium-Density Residential
Existing Zoning:	A-2-10 (General Agriculture)
Sphere of Influence:	N/A
Williamson Act Contract No.:	N/A
Environmental Review:	Mitigated Negative Declaration
Present Land Use:	Mini-storage facility, duplex, four-plex, single-family dwelling, and vacant land.
Surrounding Land Use:	Recreational vehicle (RV) storage facility and mobile home park to the north; State Route (SR) 99 to the west and south; residential development and the Community of Keyes to the east and southeast.

RECOMMENDATION

Staff recommends the Planning Commission provide a recommendation of approval to the Board of Supervisors, based on the discussion below and on the whole of the record provided to the County. Exhibit A provides an overview of the findings and actions required for project approval.

PROJECT DESCRIPTION AND BACKGROUND

This is a request to amend the Community Plan designation from Medium-Density Residential to Commercial and the zoning designation from General Agriculture (A-2-10) to Planned Development (P-D) to allow for the operation of an existing mini-storage facility on a 4.67± acre parcel. The General Plan designation is Planned Development which is consistent with the proposed project and will remain unchanged; however, the Keyes Community Plan designation of Medium-Density Residential is not consistent with the proposed project and is proposed to be amended to Commercial which requires an amendment to the Land Use Element of the General Plan. The mini-storage facility consists of 13 buildings totaling 39,393 square feet; each nine feet three inches in height with mounted wall lighting and containing multiple storage units ranging from 50 to 253 square feet in size. The mini-storage facility is currently operating; however, the required building permits and land use entitlements to operate were not obtained. Accordingly, land use entitlements and building permits are required to allow continued operation of the mini-storage facility.

The property was purchased in 2017 by the current property owner, at which time the property was improved with a single-family dwelling, six legal nonconforming residential units, made up of a duplex and four-plex, and a detached garage. The mini-storage facility appears, based on aerial imagery, to have been constructed in 2018. The County Planning Department's Building Permits Division was alerted to the new construction in 2022 and, upon inspection of the property a Certificate of Non-Compliance was recorded against the property for the construction without building permits. The facility was then reported to County's Department of Environmental Resources Code Enforcement Division which initiated a case in 2022 (CE-22-0394) for operation of a business without land use entitlements. Additionally, an anonymous complaint, from a person identifying themselves as a concerned resident, was received by the County in 2022 about various properties along Rohde Road, including an unimproved driveway on the project site.

The first floor of the single-family dwelling has been converted into an office for the mini-storage facility and the second floor is used as living quarters. A 2,800 square-foot detached garage, identified on the site plan as "Storage Building A", has also been converted into mini-storage units. Conversion of both the single-family dwelling and the garage occurred without building permits. The County has records of other improvements that were made to the residential units without building permits dating back to the early 1990's. Regardless of the outcome of this request, the property owner will need to obtain building permits to bring the legal nonconforming residential units back into compliance with all applicable building codes. If this project is approved, building permits will be required to be obtained for the dwelling to office conversion, garage conversion, and construction of the 13 mini-storage buildings. If the project is not approved, the property owner will need to obtain permits to convert the buildings to a permitted use and/or to demolish the nonpermitted buildings.

The mini-storage facility operates with a maximum of two employees on-site per shift (one-shift per day), with an average of three customers per day. The facility is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. The project proposes to install a mixture of ornamental trees and shrubs along the front of the office and residential units and will be required to install additional ornamental landscaping along the road frontage. A pole sign ten feet in height, to be located along the road frontage, and a wall sign, to be located on the office building, both a maximum sign face of 5 feet by 3.5 feet in size, are also proposed.

A masonry wall is required to be installed along the portions of the property abutting residential development to the east and along the Turlock Irrigation District's (TID) Lateral No. 2 ½. The mini-storage facility currently includes wrought iron fencing, with a secured access gate, along the road frontage. The road frontage along the residential uses currently includes chain link fencing with slats. As part of the building permit review process, the existing fencing will be assessed for compliance with setback requirements and may need to be moved to allow setbacks to be met. The mini-storage facility buildings have exterior wall mounted lighting and no additional lighting is being proposed.

The site is improved with 24 parking spaces. Based on the parking standard included in Chapter 21.76 – Off-Street Parking of the County's Zoning Ordinance, a single-family residence requires two parking spaces per unit and multi-family requires 1.5 parking spaces per unit which would equal 11 required parking spaces for the residential uses on-site. Although Chapter 21.76 does not specify a parking standard for mini-storage facilities, similar approved PD projects have typically included one space per employee plus three customer spaces, which is the manufacturing and warehousing standard. Based on this standard and with a maximum of two employees, the project would require an additional six parking spaces for the mini-storage facility. Zoning Ordinance Section 21.76.210 – Uses Not Specified gives the Planning Commission authority to set the parking standards based on the intensity of use by motor vehicles. If the Planning Commission chooses to apply the manufacturing and warehousing standard, the project site's existing parking exceeds the County's parking standard applied to similar facilities with a total of 17 spaces required and a total of 24 spaces provided.

The site is currently served by a private on-site well and septic systems; however, connection to the Keyes Community Services District for water and sewer services is a requirement of project approval. Stormwater will be managed on-site through an on-site storm drainage basin. The facility has two driveways, one serving the residential units and customer parking and the other providing limited access to the mini-storage units, which both take access from County-maintained Rhode Road.

SITE DESCRIPTION

The site is located at 5024, 5028, and 5030 Rhode Road, between Esmar and Faith Home Roads, in the Keyes area. A recreational vehicle (RV) storage facility and mobile home park are located to the north; State Route 99 to the west and south; residential development and the Community of Keyes to the east and southeast. The Turlock Irrigation District Lateral No. 2 ½ abuts the site on the west and north.

The 4.67± site is made up of two assessor's parcel numbers (APNs), APN: 041-059-001 which is approximately 3.97 acres in size and APN: 041-059-002 which is approximately .70 acres in size. Approximately 3.5 acres of the site is currently developed with the mini-storage and residential units and the remaining 1.17 acre portion of the site is vacant and unimproved.

ISSUES

The following issues have been identified as part of the review of the project:

The mini-storage facility is currently operating; however, the required building permits and land use entitlements to operate were not obtained. Accordingly, if this project is approved, development standards will require the applicant apply for and be issued building permits for all unpermitted on-site improvements, including but not limited to the mini-storage buildings, the garage conversion to mini-storage units, residential conversion to an office, and any outstanding unpermitted improvements to the residential units within six months of project approval. Development standards further require that required building permits be finalized and Certificates of Occupancy issued within one year of project approval. Issuance of a building permit or certificate of occupancy after these time frames may be approved, subject to a staff approval permit, provided the Planning Director finds that the property owner/operator has been actively working towards issuance of the permit and has shown due diligence in progressing the permitting forward.

The site is made up of two APNs which are 4.67± acres combined. Due to structures being located across the two APNs if they are determined to be separate legal parcels, a merger will be required to be completed prior to issuance of a certificate of compliance.

The site is currently improved with a mixture of fencing, including a wrought iron fence along the road frontage that runs along the mini-storage facility, and a mixture of wood and metal fencing around the remaining perimeter of the site. A masonry wall is required to be installed along the portions of the property abutting residential development and the Turlock Irrigation District's (TID) Lateral No. 2 ½. The masonry wall abutting residential shall be eight feet in height, based on County standards for screening between residential and non-residential uses. The masonry wall located along TID Lateral No. 2 ½ shall meet the TID's standards, which could be less than eight feet in height. The existing fencing installed along the road frontage may remain provided it meets setback, vision clearance, and storage depth requirements.

Although no additional exterior lighting is being requested, a development standard applied to the project would limit the height of any additional freestanding lighting to 15 feet.

The applicant proposes to construct a pole sign 10 feet in height with a sign face 5 feet by 3.5 feet in size. Consistent with the development standards for the H-1 (Highway Frontage District) staff will support the use of a pole sign only when they are determined to be necessary to serve the traveling public where the use could not otherwise be identified. Where such a determination cannot be made one monument sign not more than 12 square feet in area nor more than six feet in height may be permitted in the front yard. In order to maintain consistency with these signage standards, staff has applied a development standard to the project limiting the signage to meet this standard.

A mitigation measure has been applied to the project, as required by the Environmental Impact Report prepared for the Keyes Community Plan, requiring the applicant to pay a Keyes Community Plan Traffic Impact Mitigation fee. Public Works has identified that the fee schedule for this funding program requires an update, the process for which is currently underway and has not yet been scheduled for consideration by the Board of Supervisors. The Mitigation Measure requires that the Keyes Community Traffic Impact Mitigation fee program in place at the time of building permit issuance be paid. The project will also be subject to all applicable Public Facility Fee (PFF) and Regional Traffic Impact Fees (RTIF) in place at the time of building permit issuance.

No other issues have been identified as a part of this request. Standard development standards, along with those discussed in the *Environmental Review* section of this report, have been added to the project.

GENERAL PLAN CONSISTENCY

The General Plan designation of the proposed project site is Planned Development, which is intended for land which, because of its demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. The project site's Keyes Community Plan designation is Medium-Density Residential, which is intended to provide appropriate locations for single- and multi-family units with a residential building intensity varying from zero up to 14 units per net acre (with a population density ranging from zero to 45 persons per net acre). A General Plan Amendment is required to change the Keyes Community Plan designation from Medium-Density Residential to Commercial.

In accordance with the criteria laid out in the General Plan, General Plan Amendments affect the entire County and must be evaluated in terms of the project's impacts to the economic, physical, and social well-being of the County in general. The County in reviewing General Plan Amendments shall consider the additional costs to the County that might be anticipated and how levels of public and private service might be affected. In order to approve a General Plan Amendment, three findings must be made:

1. *The General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses.*
2. *The County and other affected government agencies will be able to maintain levels of service consistent with the ability of the government agencies to provide a reasonable level of service.*
3. *The amendment is consistent with the General Plan goals and policies.*

The Keyes Community Plan states that, "with the exception of an established mobile home park located north of Turlock Irrigation District's (TID) Upper Lateral 2 1/2, Medium and Medium High Density land use designations are moved from the periphery of Keyes to the interior of the community. Establishment of Medium and Medium-High Density housing adjacent to the community's commercial districts and public amenities will accommodate long-range housing needs for the community and County, while encouraging a compact community form." While the project site is not located in the interior of the community, it is located between residential uses to the north and the east; however, the site is physically separated from the surrounding residential uses by the TID Lateral to the north and has no direct connectivity to the residential uses to the east.

The Keyes Community Plan recognizes that with the community's small size and proximity to competing commercial centers outside the community (cities of Ceres and Turlock) that the community's Commercial designations take on a neighborhood convenience focus; the Commercial designations within the community are intended to provide essential community retail goods and services with activities ranging from single commercial uses to neighborhood shopping centers. The Community Plan encourages the development of commercial areas which conveniently service residential populations, provide employment opportunities, form an attractive

segment of the community and contribute to the County's tax base. The Keyes Community Plan identified commercial development opportunities along higher traffic roadways such as Washington Road, Keyes Road, and Faith Home Road.

The Keyes Community Plan was adopted in 2000 with the project site designated for Medium-High Density Residential, a designation that the plan identifies as "uses" that should be located along collector roadways, and should be designed and oriented in order to function as part of the overall neighborhood (Goal Three/Policy Three) and that multi-family residential land uses shall be developed with a balance of open space, landscaping, and shall be accessible to commercial and recreational areas and public transportation facilities (Goal Three/Policy Seven). It is likely that the community plans designation for the project site was identified based on the nonconforming residential uses of the property, its proximity the residential subdivision to the east, and physical separation by the TID Lateral to the commercial uses to the north; however, the site has no direct connectivity to the surrounding residential uses and is only accessible via a roadway that directly fronts onto State Route (SR) 99. Based on the characteristics of the project site and the surround land uses, a commercial designation and a planned development zoning designation allows for a use that is compatible with the adjoining residential, appears to be appropriate.

Goal Two of the Keyes Community Plan calls for improving the visual appearance of the Keyes community and Goal Three calls for encouraging attractive and orderly development which preserves a small-town atmosphere by providing a diverse community that integrates residential, commercial, and industrial land uses supported by public facilities. Policy Five, of Goal Two requires that gateway landscape treatments should be established at the SR 99/Keyes Road Interchange, and at Rohde Road and the crossing of the Turlock Irrigation District's Upper Lateral No. 2 ½ (which is where the project site is located). The project proposes to install a mixture of ornamental trees and shrubs along the front of the office and residential units. A draft landscape plan which proposes to install a mixture of ornamental trees and shrubs along the front of the office and residential units is included as Exhibit B-11 of this report. To meet the Keyes Community Plan's "Gateway" treatment standards, the project will be required to install additional landscaping, a mixture of ornamental trees and shrubs, along the road frontage. As required by project development standards, a final landscape plan, that includes species, spacing, and irrigation methods, will be submitted to County Planning for review and approval prior to issuance of a building permit.

The proposed change in General Plan designation will maintain a logical land use pattern as the project is adjacent to an existing RV sales business and Highway 99 and, as proposed to be developed and operated, is compatible with the adjoining residential uses. The proposed project will not be extending the current Community Plan boundaries and effective and reasonable levels of service will be maintained.

Goal Two, Policy Fourteen, Implementation Measure 1 of the Land Use Element requires all development proposals that require discretionary action to be carefully reviewed to ensure that approval will not adversely affect an existing agricultural area and to ensure compatibility between land uses.

Goal One of the Keyes Community Plan calls for achieving a harmonious relationship between the urban environment and surrounding agricultural setting by providing for adequate setback between the built environment and agricultural uses along the periphery of the community (outside

the Community Plan area). The General Plan's Agricultural Element Agricultural Buffer Guidelines states that new or expanding uses approved by a discretionary land use entitlement in the A-2 zoning district, or on a parcel adjoining the A-2 zoning district, should incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people-intensive outdoor uses, to physically avoid conflicts between agricultural and non-agricultural uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people-intensive uses are permitted uses within the buffer setback area. The nearest agricultural parcel is located north of the site, across the TID Lateral No. 2 ½, and is 6± acres in size and is utilized for irrigated pasture. While the 6±acre site is zoned A-2-10, it is designed as Medium-Density in the Keyes Community Plan and is landlocked between a mobile home park to the north, a residential subdivision and a TID Lateral to the south, a commercial use to the west, and Faith Home Road to the north. While the boundaries of the parcels are within 150 feet of each other, the parcels are separated by the TID Lateral, the project site will be developing a masonry wall along the Lateral, and the developed area of the project is located more than 300 feet from the nearest agricultural parcel.

As required by the General Plan's Land Use Element Sphere of Influence Policy, all discretionary projects within the sphere of influence (SOI) of a sanitary sewer district, domestic water district, or community services district, shall be forwarded to the district board for comment regarding the ability of the district to provide services. If the district serves an unincorporated community with a Municipal Advisory Council (MAC), the proposal shall also be referred to the MAC for comment. The project site is within the Keyes Community Services District (CSD) service boundaries and is proposed to be served with public water and sewer by the Keyes CSD. A will-serve letter was provided by the Keyes CSD which outlines conditions that must be met prior to hooking up to water and sewer services. These requirements have been incorporated into the project's development standards. The proposed project is also located within the boundary of the Keyes MAC and, accordingly, was presented to the MAC at a meeting held on October 19, 2023. Members of the MAC asked if the proposed development was already constructed; to which staff confirmed that it was. On a 4-0 vote, the MAC voted to support the project request as proposed.

Policy 26 and 27 of the Land Use Element of the Stanislaus County General Plan requires city support of projects located within a city sphere of influence (SOI) and consultation with cities when a project is located within one mile of a city SOI and within the city's General Plan area. Though the project does not meet either requirement for city referral, the project does propose to hook up to Keyes CSD for public sewer services which is provided with support from the City of Turlock. Accordingly, the project was referred to the City of Turlock for comment. A referral response received from the City of Turlock indicated they had no comments on the project.

The proposed project is consistent with the property's existing General Plan designation of Planned Development. Staff believes the findings required for a General Plan Amendment can be made.

ZONING ORDINANCE CONSISTENCY

The 4.67± acre project site is currently zoned General Agriculture (A-2-10). This is a request to rezone the project site to Planned Development (P-D), to allow for operation of a mini-storage facility which is a non-permitted use in the A-2 and has been developed without the necessary land use entitlements. The P-D will allow for the continuation of the legal nonconforming

residential uses.

To approve a rezone, the Planning Commission must find that it is consistent with the General Plan. Pursuant to the General Plan, land within a Planned Development designation should be zoned A-2 until development occurs through Planned Development zoning. A development standard has been incorporated into the project requiring that any standard not specifically specified within this staff report, such as setbacks, height limits, and lot coverage limits, will be required to meet the County's Planned Industrial (PI) zoning district's standards; however, the PI zoning will only apply to standards and not to permitted uses. If approved, the existing residential uses and mini-storage facility will become the only permitted uses of the new Planned Development zoning district and any expansion or amendment to the uses will be subject to additional land use entitlements in accordance with Section 21.40.080 – Amendments to the Development Plan of the County's Zoning Ordinance. This project will maintain zoning consistency by adhering to the uses and development standards, including parking, fencing, landscaping, signage, lighting, building height, and setbacks, incorporated into this project (see Exhibit C – *Development Standards and Mitigation Measures*).

If the project is approved, the proposed zoning designation of Planned Development will be consistent with the existing General Plan designation of Planned Development and proposed Community Plan designation of Commercial. Staff believes the project can make the findings required to rezone the project site, as outlined in Exhibit A of this report.

ENVIRONMENTAL REVIEW

Pursuant to the California Environmental Quality Act (CEQA), the proposed project was circulated to interested parties and responsible agencies for review and comment and no significant issues were raised (see Exhibit H – *Environmental Review Referrals*). An Initial Study was circulated from December 22, 2023 to January 24, 2024.

Applicable mitigation measures from the Mitigation Monitoring and Reporting Program (MMRP) for the Keyes Community Plan Environmental Impact Report, certified on April 18, 2000, were incorporated into the project to address potentially significant impacts to aesthetics, biological resources, hazards and hazardous materials, noise, and transportation. The mitigation includes: requiring minimal use of reflective surfaces along roadways in design to reduce glare; shielded light fixtures to address light spillage; pre-construction surveys to protect certain special status species including Swainson's Hawk, Burrowing Owl, and Valley Elderberry Longhorn Beetle; oak tree preservation plans; stop-work orders, included in construction contracts, in the event of site contamination; limits on hours of construction; and payment towards the Keyes Community Plan Traffic Mitigation Funding program that will contribute to future roadway improvements in the Keyes area.

A response to the Initial Study referral was received from the California Department of Toxic Substance Control which requested their department be added to the Initial Study as a responsible agency and to the Mitigation Monitoring and Reporting Program as an "Other Responsible Agency". Both documents have been amended to reflect their request. Amendments to initial studies and mitigation measures may be made without recirculation provided they are providing clarifying information only and in the case of mitigation measures can be found to be equivalent or more effective in mitigating or avoiding potential significant effects

and will not cause any potentially significant effect on the environment. The edits made to the Amended Initial Study and Mitigation Monitoring and Reporting Program will not create new significant impacts and are considered to be clarifying in nature. Accordingly, the amended documents are not required to be re-circulated and have been included as Exhibits E and F of this report for consideration (see Exhibit E – *Amended Initial Study, with Attachments* and Exhibit F - *Amended Mitigation Monitoring and Reporting Program*).

The project is considered to have a less than significant impact with mitigation measures included. Accordingly, a Mitigated Negative Declaration has been prepared for adoption, prior to action on the project (see Exhibit G – *Mitigated Negative Declaration*). Development Standards reflecting referral responses have also been placed on the project (see Exhibit C – *Development Standards and Mitigation Measures*).

Note: Pursuant to California Fish and Game Code Section 711.4, all project applicants subject to the California Environmental Quality Act (CEQA) shall pay a filing fee for each project; therefore, the applicant will further be required to pay **\$2,973.75** for the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the Clerk-Recorder filing fees. The attached Conditions of Approval/Development Standards ensure that this will occur.

Contact Person: Kristy Doud, Deputy Director of Planning, (209) 525-6330

Attachments:

- Exhibit A - Findings and Actions Required for Project Approval
- Exhibit B - Maps, Plans, and Elevations
- Exhibit C - Development Standards and Mitigation Measures
- Exhibit D - Development Schedule
- Exhibit E - Amended Initial Study with Attachments
- Exhibit F - Amended Mitigation Monitoring and Reporting Program
- Exhibit G - Mitigated Negative Declaration
- Exhibit H - Environmental Review Referrals
- Exhibit I – Levine Act Disclosures

Findings and Actions Required for Project Approval






1. Adopt the Mitigated Negative Declaration pursuant to CEQA Guidelines Section 15074(b), by finding that on the basis of the whole record, including the Amended Initial Study, Amended Mitigation Monitoring and Reporting Program, and any comments received, that there is no substantial evidence the project will have a significant effect on the environment and that the Mitigated Negative Declaration reflects Stanislaus County's independent judgment and analysis.
2. Find that the Amended Mitigation Monitoring and Reporting Program is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.
3. Order the filing of a Notice of Determination with the Stanislaus County Clerk-Recorder's Office pursuant to Public Resources Code Section 21152 and CEQA Guidelines Section 15075.
4. Find, based on the discussion in this report, and the whole of the record that:
 - a. The General Plan Amendment will maintain a logical land use pattern without detriment to existing and planned land uses.
 - b. The County and other affected governmental agencies will be able to maintain levels of service consistent with the ability of the governmental agencies to provide a reasonable level of service.
 - c. The amendment is consistent with the General Plan goals and policies.
5. Find that the proposed Planned Development zoning and Community Plan designation of Commercial is consistent with the Planned Development General Plan designation.
6. Approve General Plan Amendment and Rezone Application No. PLN2023-0031 – Secured Space Self Storage, subject to the attached Development Standards and Development Schedule.
7. Introduce, waive the reading, and adopt an ordinance for the approved Rezone Application No. PLN2023-0031 – Secured Space Self Storage.

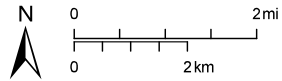
SECURED SPACE SELF STORAGE

GPA REZ PLN2023-0031

AREA MAP

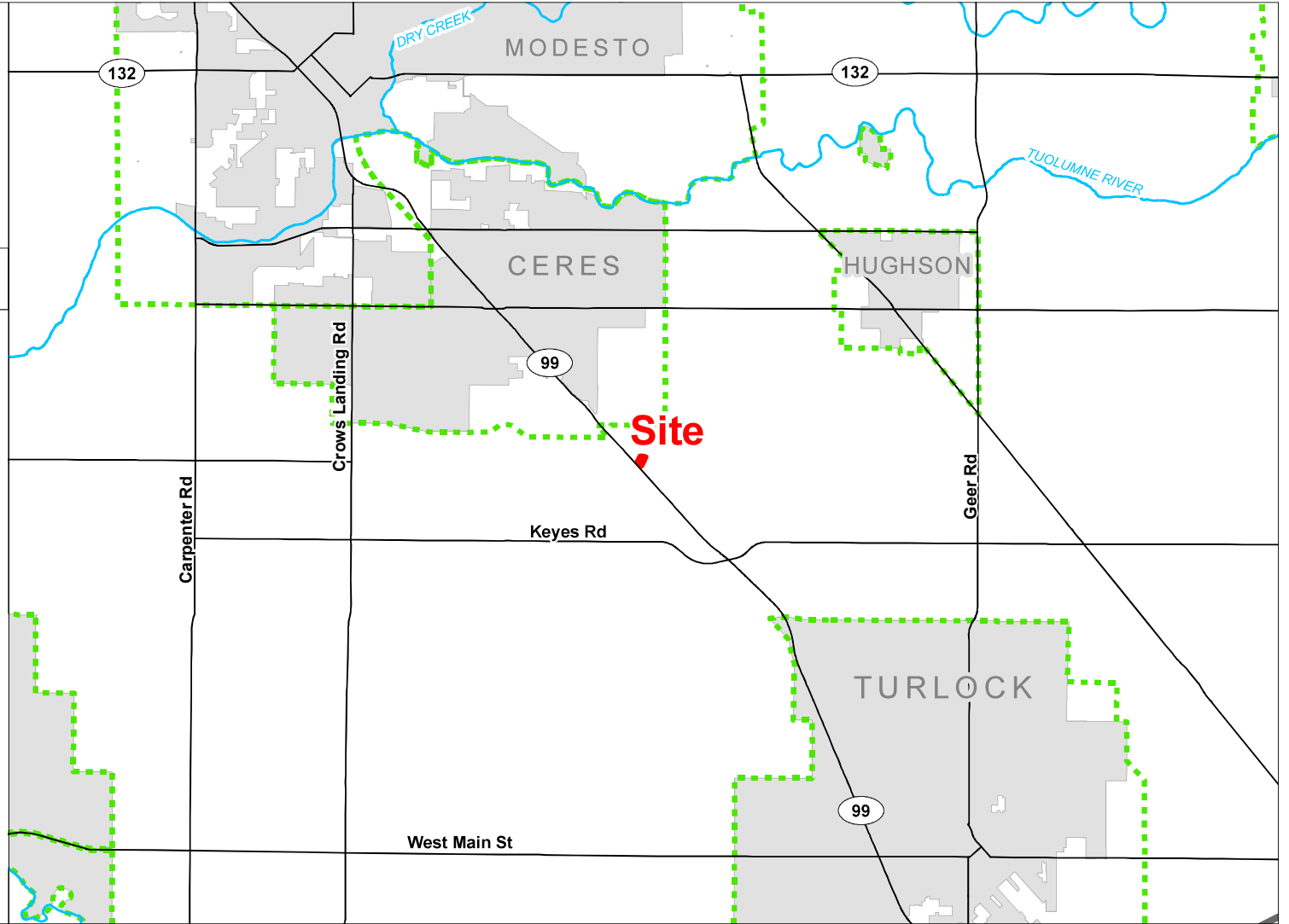
LEGEND

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



Source: Planning Department GIS

Date: 4/19/2023



SECURED SPACE SELF STORAGE

GPA REZ PLN2023-0031

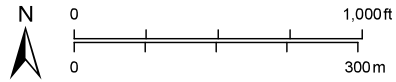
GENERAL PLAN MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Parcel
-  Road
-  Canal

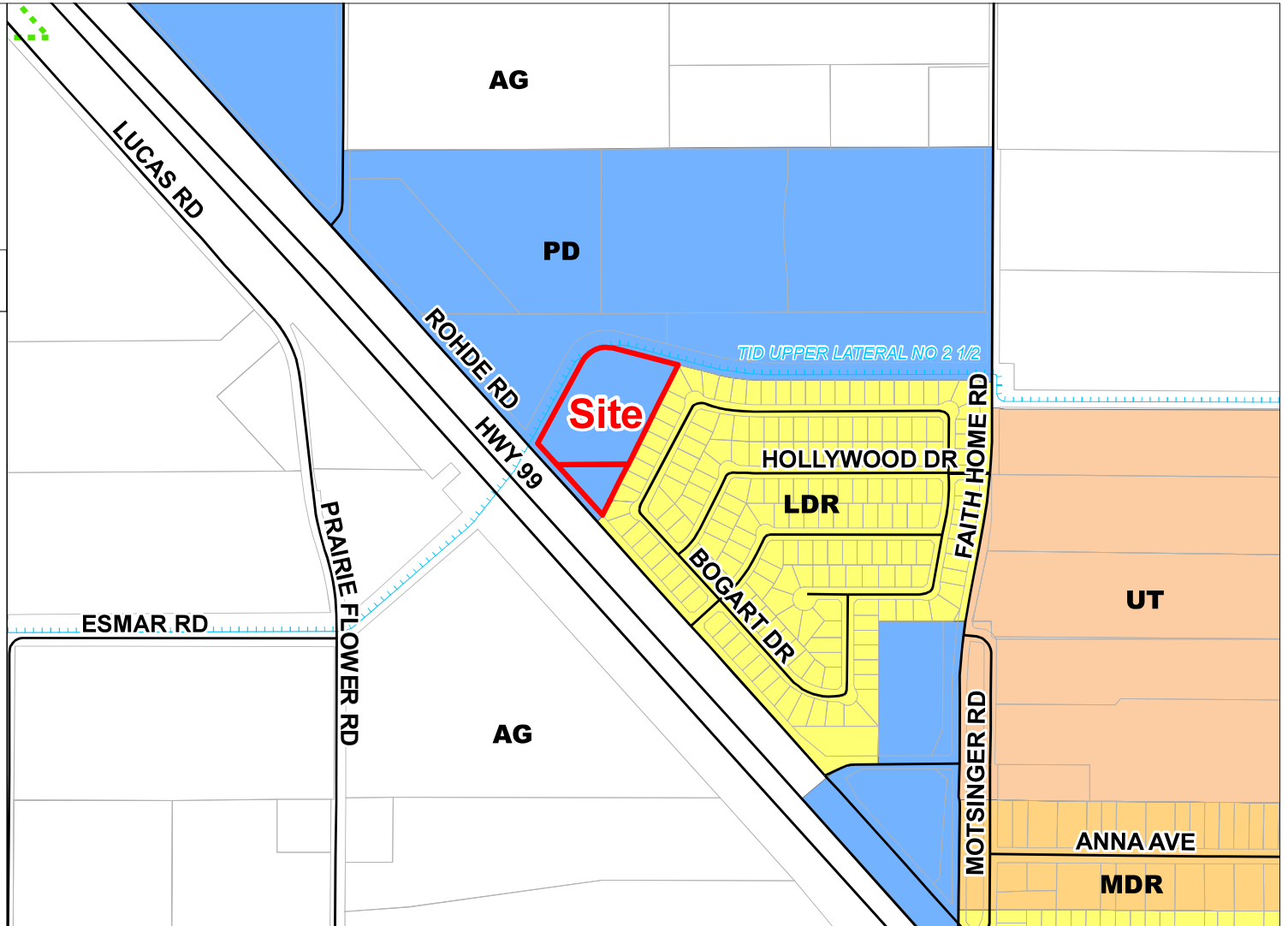
General Plan

-  Agriculture
-  Low Density Residential
-  Medium Density Residential
-  Urban Transition
-  Planned Development



Source: Planning Department GIS

Date: 4/19/2023










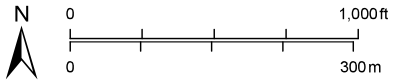
SECURED SPACE SELF STORAGE

GPA REZ PLN2023-0031

COMMUNITY PLAN MAP

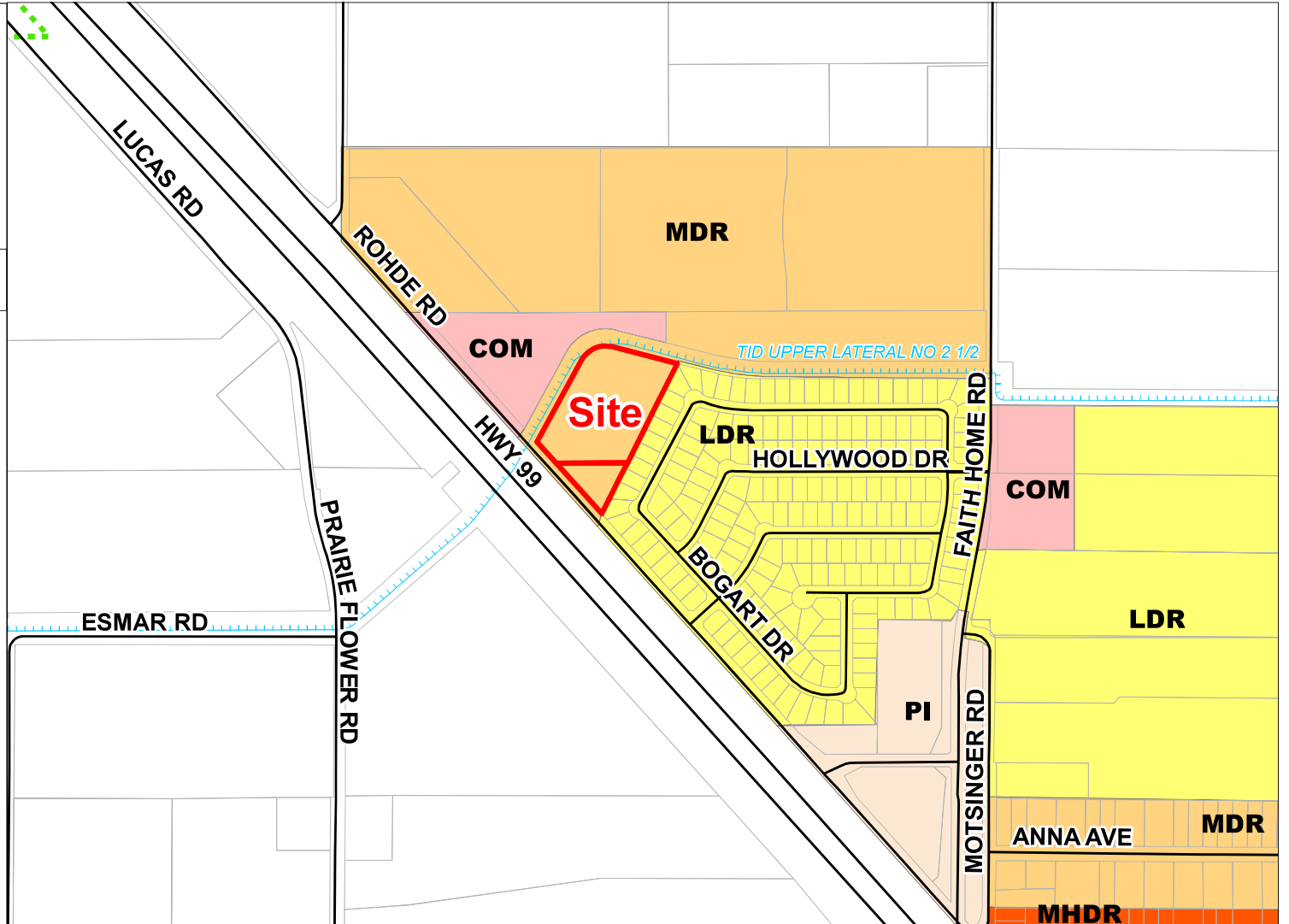
Community Plan Land Use Designations

-  Residential - Medium
-  Residential - Low
-  Residential - Medium-High
-  Commercial
-  Planned Industrial
-  Sphere of Influence
-  Road



Source: Planning Department GIS

Date: 4/19/2023














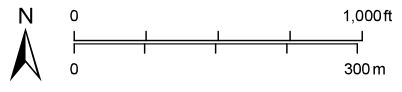
SECURED SPACE SELF STORAGE

GPA REZ PLN2023-0031

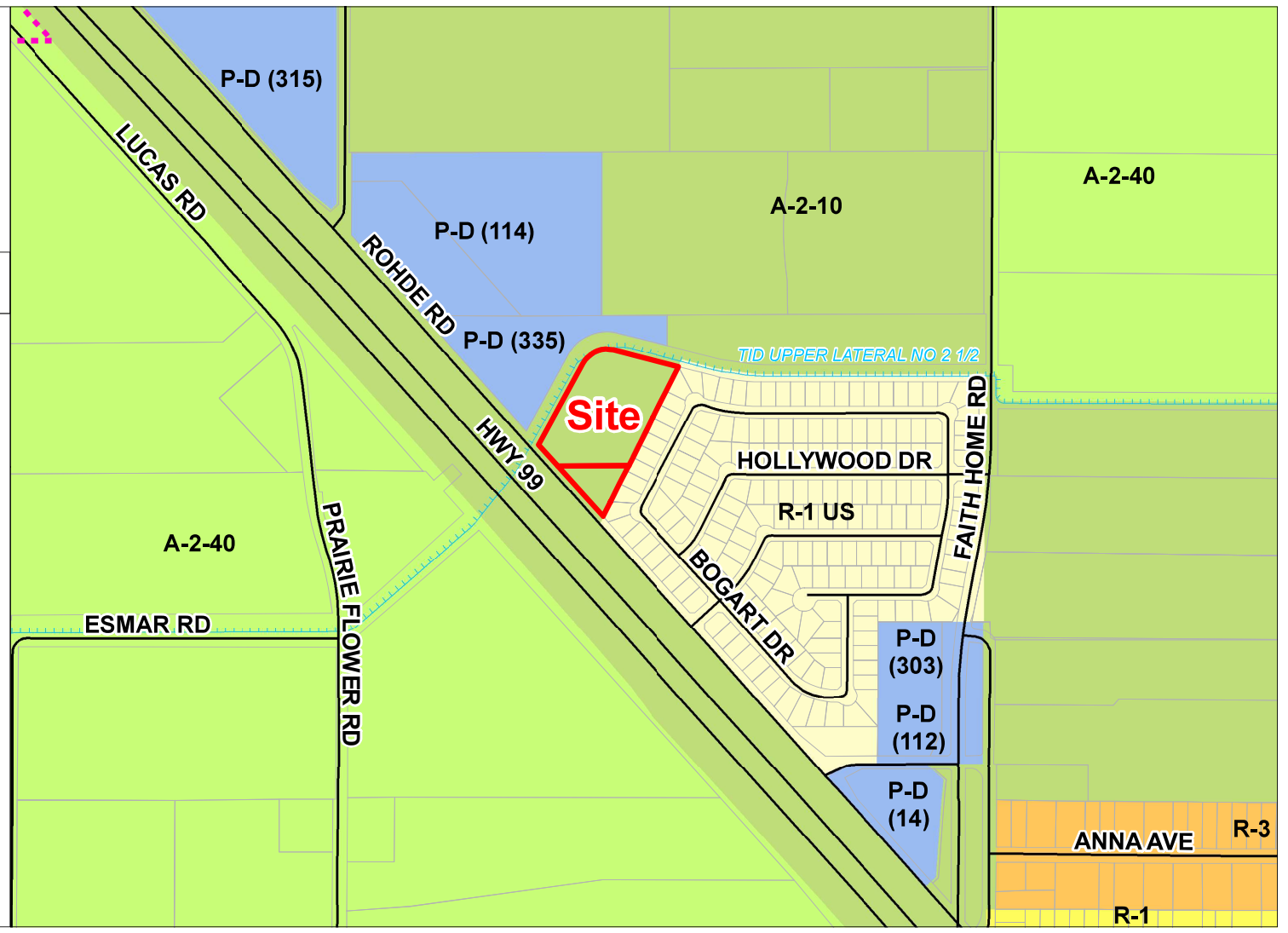
ZONING MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Parcel
-  Road
-  Canal
- Zoning Designation**
-  General Agriculture 10 Acre
-  General Agriculture 40 Acre
-  Planned Development
-  Single Family Residential
-  Single Family Residential
-  Multiple Family



Source: Planning Department GIS Date: 4/19/2023







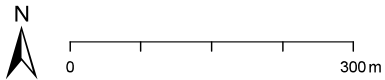
SECURED SPACE SELF STORAGE

GPA REZ PLN2023-0031

2023 AERIAL AREA MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Road
-  Canal



Source: Planning Department GIS

Date: 4/19/2023






Copyright Inearmap 2015

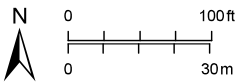
SECURED SPACE SELF STORAGE

GPA REZ
PLN2023-0031

2023 AERIAL SITE MAP

LEGEND

-  Project Site
-  Road
-  Canal



Source: Planning Department GIS

Date: 4/19/2023



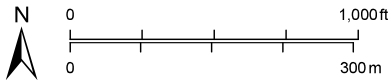
SECURED SPACE SELF STORAGE

GPA REZ
PLN2023-0031

ACREAGE MAP

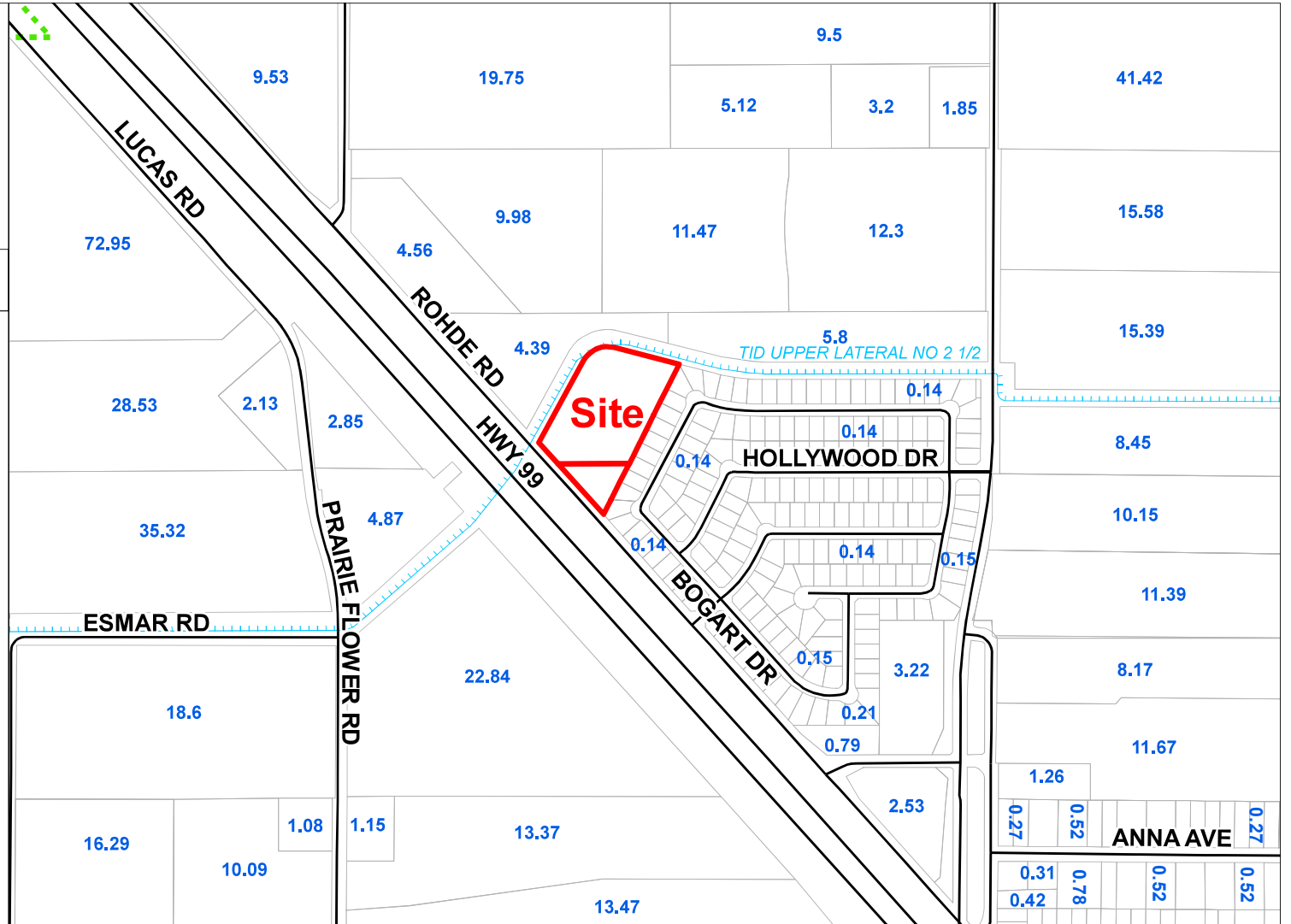
LEGEND

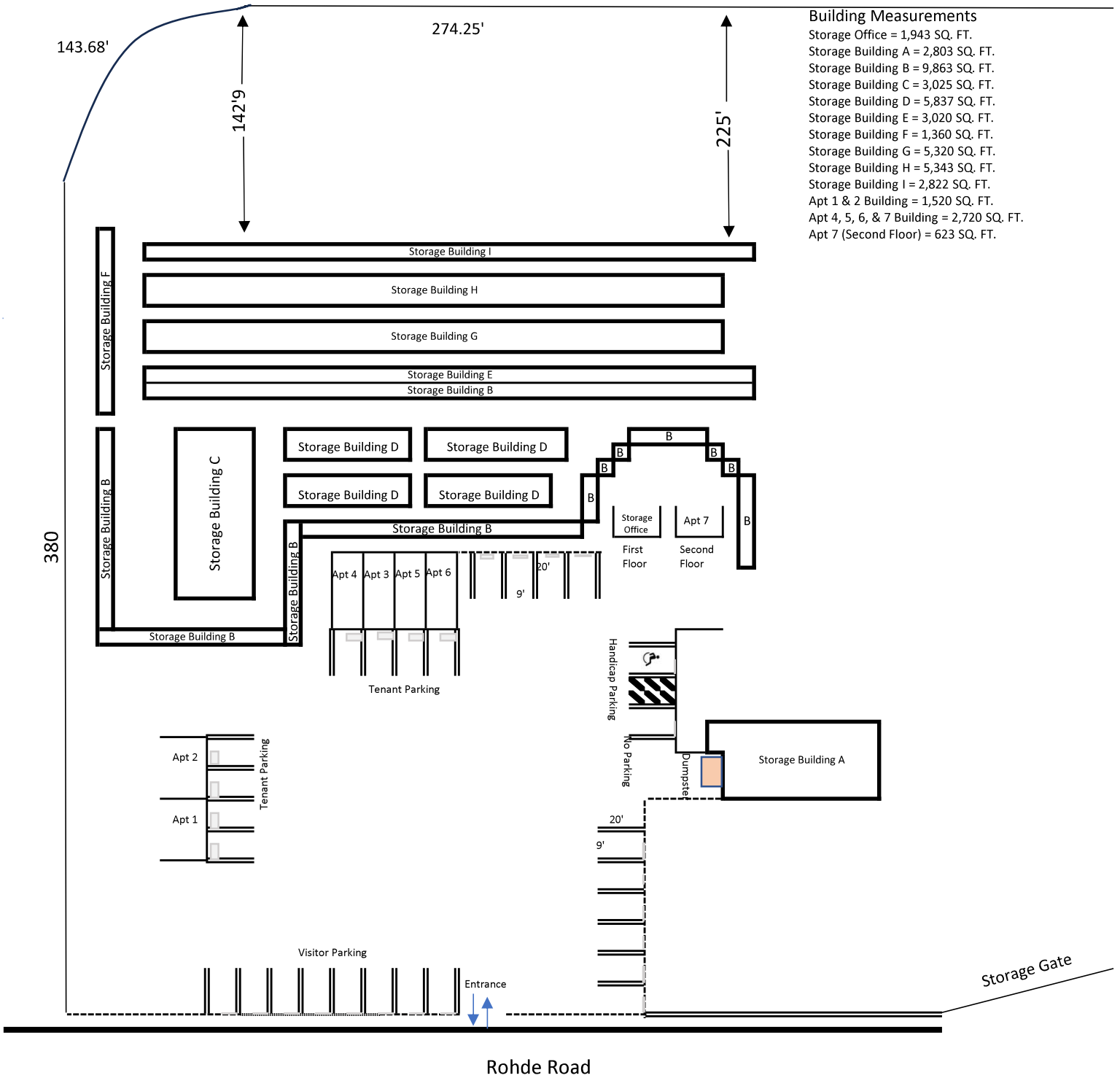
- Project Site
- Sphere of Influence
- # Parcel/Acres
- Road
- Canal



Source: Planning Department GIS

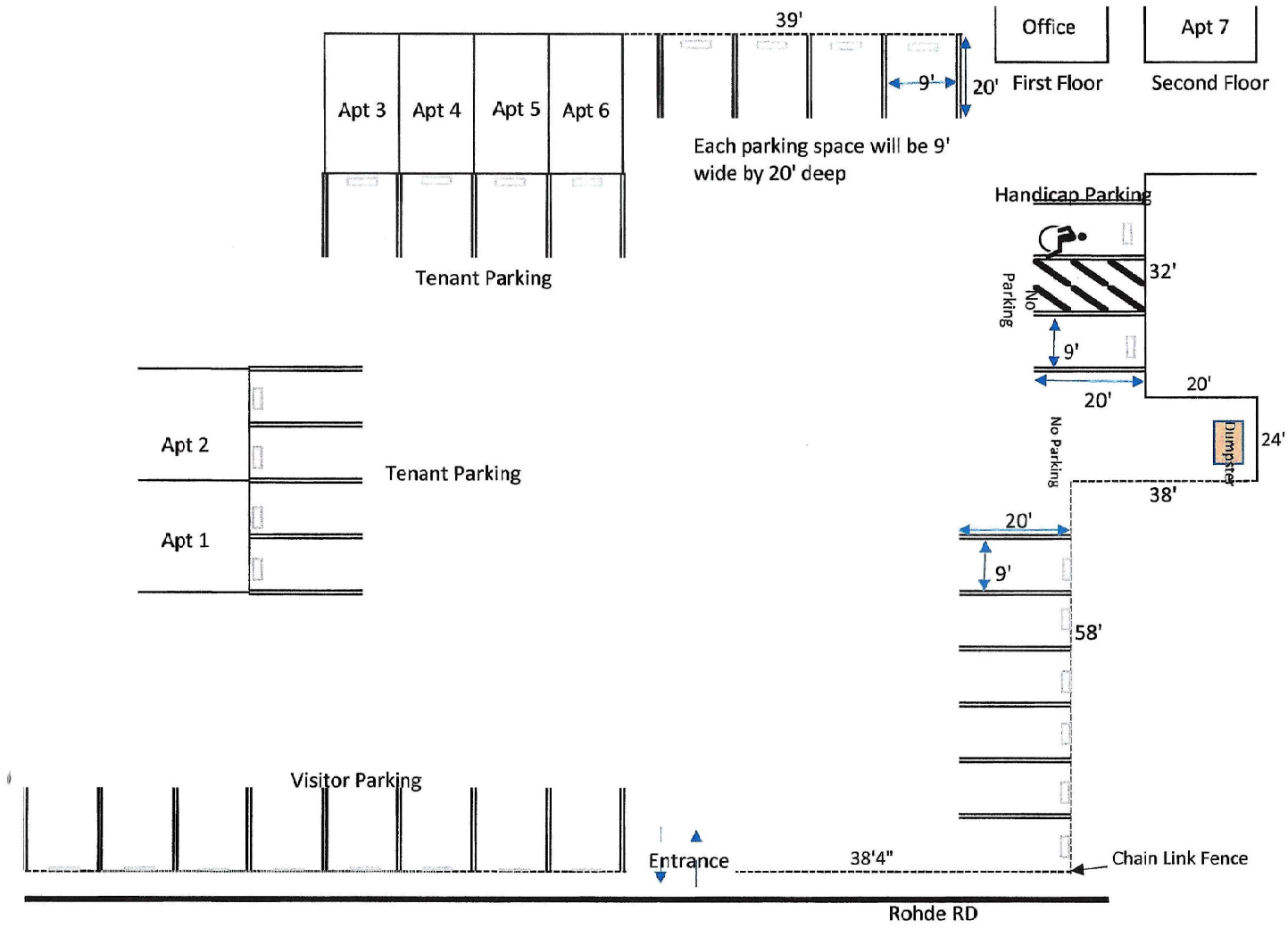
Date: 4/19/2023



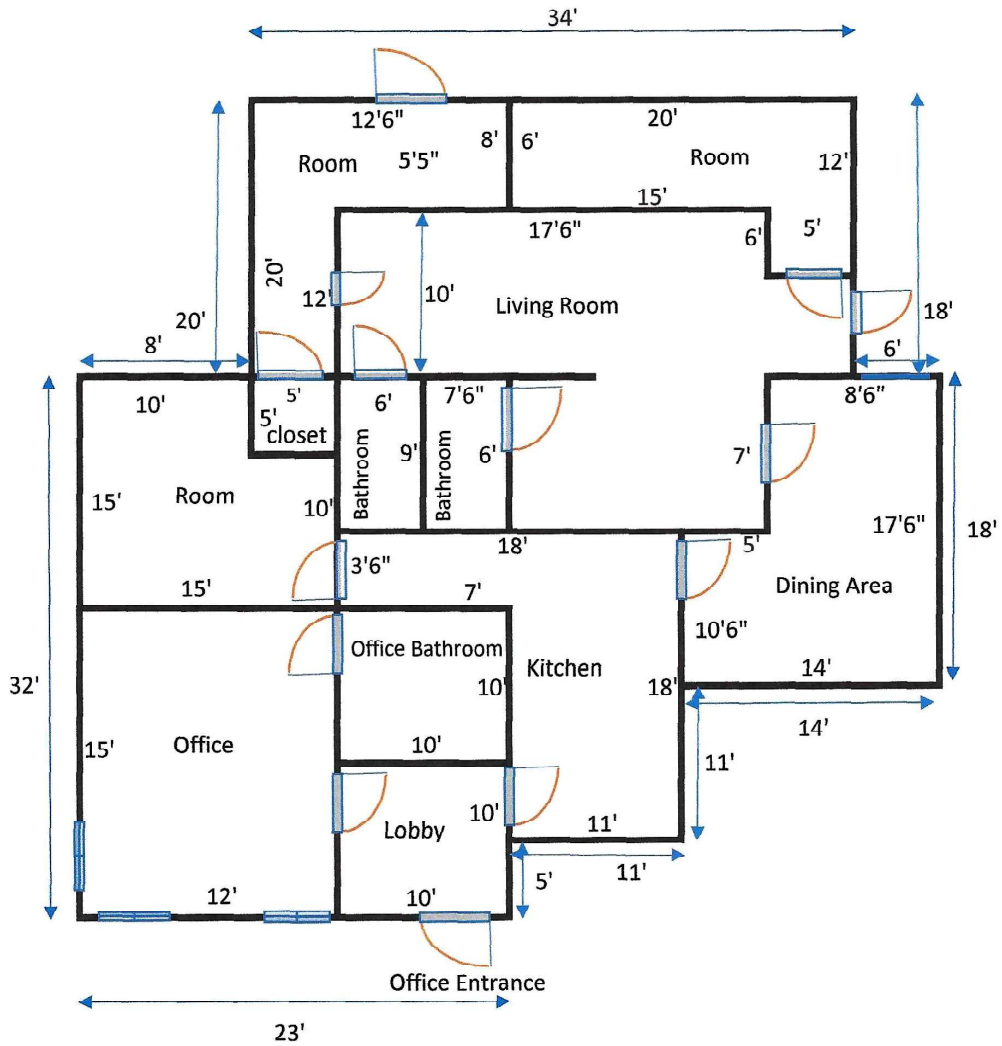


Building Measurements

- Storage Office = 1,943 SQ. FT.
- Storage Building A = 2,803 SQ. FT.
- Storage Building B = 9,863 SQ. FT.
- Storage Building C = 3,025 SQ. FT.
- Storage Building D = 5,837 SQ. FT.
- Storage Building E = 3,020 SQ. FT.
- Storage Building F = 1,360 SQ. FT.
- Storage Building G = 5,320 SQ. FT.
- Storage Building H = 5,343 SQ. FT.
- Storage Building I = 2,822 SQ. FT.
- Apt 1 & 2 Building = 1,520 SQ. FT.
- Apt 4, 5, 6, & 7 Building = 2,720 SQ. FT.
- Apt 7 (Second Floor) = 623 SQ. FT.



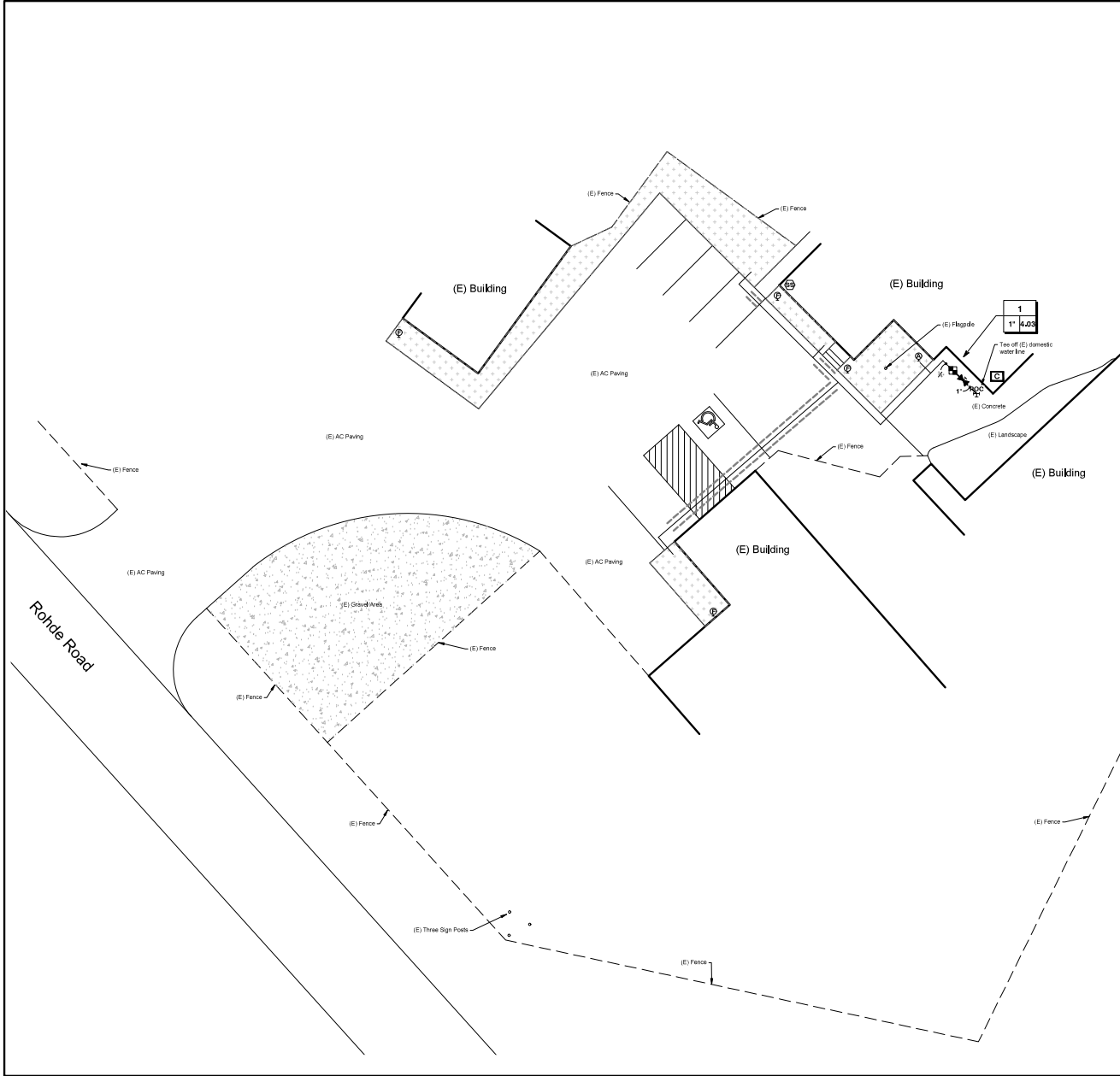
Office Floor Plan



The total area used for the office is 280 sq ft and 100 sq ft for the bathroom.

The total area for office use is 380 sqft.

The remaining area is not being used and is vacant.



Project Information:

Owner Contact: Biren Patel
 (209) 485-5168
 psachin1@gmail.com
 Rehab/Std. private

Project Type: 1.169 of total
 Water Supply: Potable water, City of Ceres
 Applicant Compliance Statement: "I agree to comply with the requirements of the prescriptive compliance option to the MWELCO."
 Applicant Signature: _____ Date: 6-21-23

Irrigation Legend:

SYMBOL	MANUFACTURER/MODEL/DESCRIPTION
☐	Rain Bird MAC2-100-PPF Medium Flow Drip Control Kit, 1" Anti-Siphon Valve Filter, 1" RBY Filter and equal pressure regulator, for above grade installation, 3.0 GPM @ 15 GPM
☐	Rain Bird MDCFCAP DripLine Flush Valve
☐	Rain Bird ARW550 Air Relief Valve
☐	Area to Receive Drip Emitters
☐	Point Source Drip Emitters with Self Piercing Berbs Emitters per plant: 20-HB emitters (2 assigned to each 1 gal. shrub) 20-HCB emitters (3 assigned to each 5 gal. shrub) 20-HCB emitters (5 assigned to each 15 gal. tree)
☐	Nico Ball Valve, T-600-BR-20-RR, Line Size
☐	Hunter IC200 2 Station Controller, Residential Use, Plastic Cabinet, Outdoor, with 3 Independent Programs, 120 VAC
☐	Hunter Sola-Sync, Wireless Install on southeast corner of building.
☐	Point of Connection
---	Infiltration Lateral Line, PVC Schedule 40
---	Infiltration Mainline, PVC Schedule 40
---	Pipe Sleeve, PVC Class 200 SDR 21

- Irrigation Notes:**
- Before beginning work, Contractor shall inspect the site. If any conditions exist that differ from what is shown on the plans and will affect the Contractor's work, notify the Owner or Landscape Architect immediately.
 - The static water pressure is assumed to be 40 psi. This irrigation system is based on a designed minimum of 20 psi and 4 gpm. Prior to irrigation installation, ensure that gpm and psi requirements are met. If there is insufficient of either, contact the Landscape Architect immediately.
 - Install all irrigation equipment in accordance with manufacturer's specifications and City of Ceres standards.
 - Piping layout is diagrammatic. Irrigation equipment shown in paved areas are for legibility only and are to be installed in planting areas (except for sleeves).
 - All irrigation pipes under paving must be sleeved. Sleeves are only shown diagrammatically on the plan, and more may be needed than shown. All mainline pipes and control lines under paving are to be installed in separate sleeves. Contractor is responsible to coordinate with other contractors to locate and install pipe sleeves under paving. All sleeves are to be 2x the diameter of the pipe within the sleeve.
 - The irrigation controller must be programmed within the days and hours established by any water conservation program adopted by the City of Ceres.
 - The Contractor is responsible to create accurate, scaled, as-built drawing of the entire irrigation system. Three copies of the as-built drawings are to be given to the Owner before the project is complete.
 - The Contractor is responsible to work with the Owner and Landscape Architect to create a maintenance schedule and complete the Certificate of Completion and Certificate of Installation in compliance with the Model Water Efficient Landscape Ordinance.
 - Contractor to install automatic irrigation per these plans. Any discrepancies are to be brought to the attention of the Landscape Architect. Contractor is responsible for the successful, full operation of the irrigation system.
 - Contractor to review controller selection and controller and location with Owner.



5024 Rohde Road
Ceres, CA

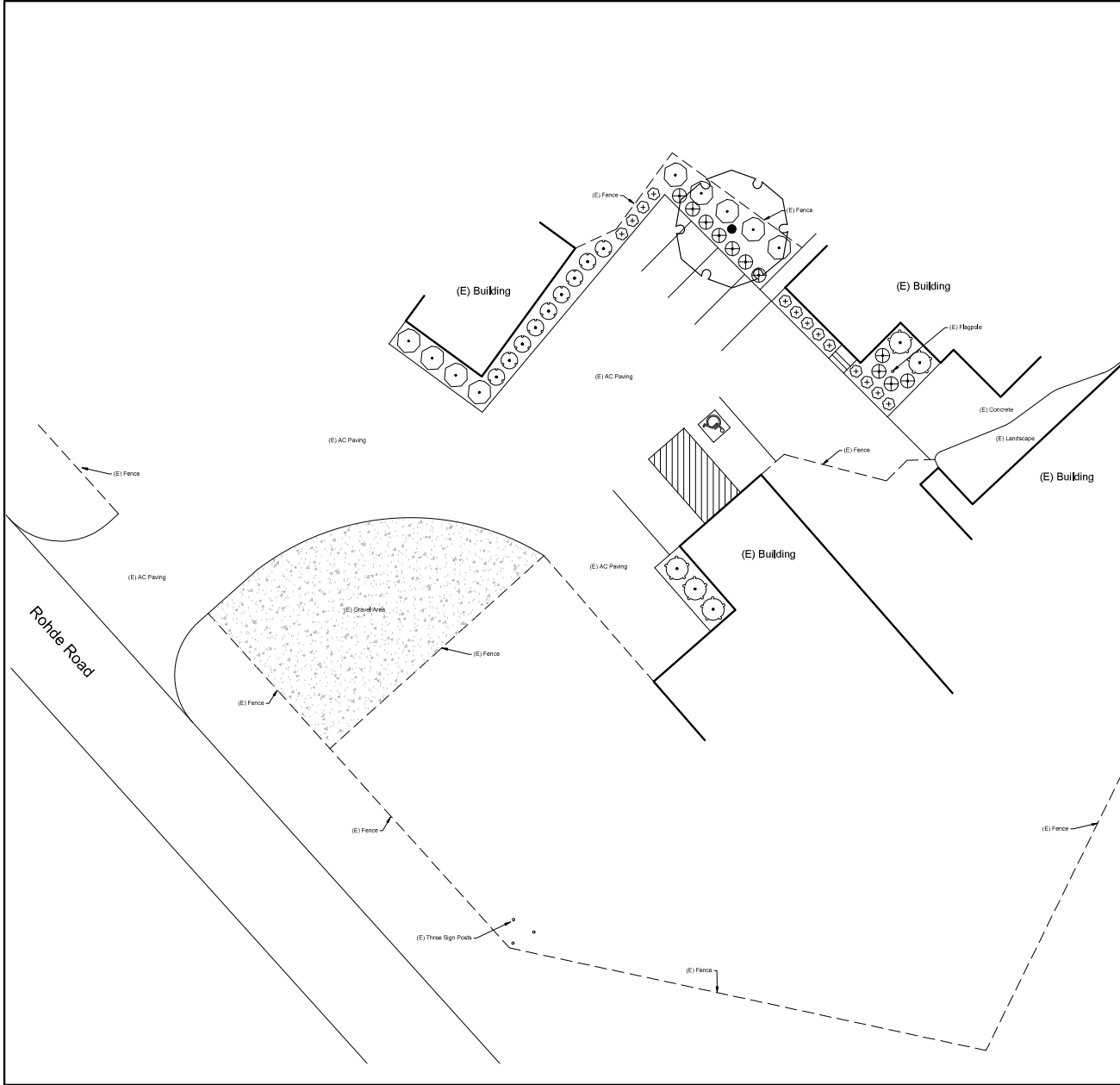
Scale: 1"=10'-0"
Date: 6-21-23
Drawn: LF
Sheet Number: L1

REVISIONS:

Linda Fish
Landscape Architect
linda@linda-fish.com
PH: 209.485.1177
PL: 209.485.1146

Irrigation Plan





Planting Legend:

TREES	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WUCOLOR	QTY
	<i>Platanus chinensis</i> 'Keith Davy'	Keith Davy Chinese Platanus	15 gal.	per plan	L	1
SHRUBS	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WUCOLOR	QTY
	<i>Arbutus unedo</i> 'Compacta'	Dwarf Strawberry Tree	5 gal.	6'	L	5
	<i>Callisemon viminalis</i> 'Little John'	Little John Weeping Bottlebrush	5 gal.	4'	L	9
	<i>Coprosma petriei</i> 'Verde Vista'	Verde Vista Mirror Plant	1 gal.	4'	L	11
	<i>Dianella revoluta</i> 'DR5000'™	Little Rev Flax Lily	1 gal.	3'	L	13
	<i>Olea europaea</i> 'Little Olive'™	Little Olive Olive	5 gal.	5.5'	VL	9

Planting Notes:

1. Before beginning work Contractor shall inspect the site. If any conditions existing that differ from what is shown on the plans and will affect Contractor's work, notify the owner or Landscape Architect immediately.
2. When fine grading, Contractor is to be sure that water control pool adjacent buildings or fences.
3. All landscape areas are to be amended with compost (4 yards per 1,000 square feet) before planting. Rototill all planting areas at least 6" deep.
4. Whenever the center of trees are within 5' of a curb or paved surface, root barriers are to be used at back of paving. The root barrier is to be installed linear against the curb or paved surface at 1" below adjacent finished grades. The gap between the barrier and paved surface shall be backfilled with soil. Use five 24" DeepRoot panels at each paved surface.
5. Contractor to submit 2 photos of each plant (photo of entire plant, plus close-up of plant tag) to the Landscape Architect for approval prior to installation.
6. Weed and weed seeds, both existing and potential are to be addressed at all planting areas. Contractor to use a pre-emergent herbicide throughout the entire project area. All additives and herbicides selected must be safe for animals and young children. If any concerns arise, Contractor is to bring them to the attention of the Landscape Architect or Owner.
7. Place 3" of natural brown bark chip mulch in all planting areas. Refresh the mulch at the end of the maintenance period so that there is at least 3" deep. Bark mulch samples must be approved by Owner and Landscape Architect prior to purchase or installation.
8. All plant material is to be of the highest quality, in healthy condition, and of a size expected of the species and container size.
9. Contractor to verify quantities listed. Plant quantities are provided as a convenience only. If there is a discrepancy between the quantities provided and what is shown on the plans, then Contractor is to refer to the plans.
10. Add OMRI - certified fertilizer tablets to each tree or shrub when planting in the following quantities:
1 gallon = 1 tablet, 5 gallon = 3 tablets, 15 gallon = 5 tablets, 24" box = 7 tablets
11. The backfill mix for tree and shrub pits must use the following: 1 part compost to 2 parts native soil.
12. Contractor is to maintain all landscape work for 60 days after the landscape has been accepted by the City of Canby.
13. All work is to be guaranteed by the installing Contractor for one (1) full calendar year after acceptance by Owner unless specified otherwise.



Revision: _____

Linda Fish
Landscape Architect
linda@linda-fish.com
503.536.1177
P.O. Box 14346

5024 Rohde Road
Irriigation Plan

5024 Rohde Road
Canby, CA

Scale: 1"=10'-0"
Date: 8-21-23
Drawn: LF
Sheet Number:

L1



	<p>3" BARK MULCH WATER RETENTION BERM 6" MAX. FERTILIZER TABLETS TYPICAL ROOTBALL - SET CROWN 1" ABOVE FINISH GRADE. PROVIDE POSITIVE DRAINAGE AWAY FROM ROOTBALL. PLANTING PIT TO BE TWICE THE DIAMETER OF ROOTBALL UNDISTURBED NATIVE SOIL UNDER ROOTBALL. PROVIDE POSITIVE DRAINAGE AWAY FROM ROOTBALL.</p>	<p>1 NORMALLY OPEN MASTER VALVE 2 36-INCH LENGTH OF COILED WIRE TO SATELLITE CONTROLLER/SPEAKER STATION 3 3-INCH MINIMUM DEPTH OF 3/4-INCH WASHED GRAVEL 4 BRICK (1 OF 4) 5 VALVE BOX WITH COVER - 12-INCH SIZE FINISH GRADE 6 RAIN BIRD FLOW SENSOR 7 36-INCH LENGTH OF COILED PEX-CABLE TO FLOW SENSING EQUIPMENT AT CONTROLLER ASSEMBLY 8 DOUBLE-STRAP SADDLE CONCENTRIC REDUCER 9 10X DIAMETER OF PIPE 10X DIAMETER OF PIPE 10X DIAMETER OF PIPE</p>	<p>3" BARK MULCH 1/4" TUBING HUNTER DRIP EMITTER TUBING STAKE POLY DRIP TUBING 1/4" BARBED CONNECTOR FINISHED SOIL</p>	
<p>M Shrub Planting</p>	<p>I Master Valve & Flow Sensor</p>	<p>E Drip Tubing and Emitter</p>	<p>A</p>	
<p>* PLANT SO THAT TOP OF ROOT BALL IS EVEN WITH THE FINISHED GRADE 2 STRAND TWISTED 12 GAUGE GALV. WIRE ENCASED IN 1" DIA. RUBBER HOSE OR 2" WIDE ELASTIC WEBBING ATTACHED TO ANCHOR STAKES WITH GALV. SCREWS. TREATED LODGEPOLE 1-3 STAKES 5' x 2" DIMEN. (MIN. 1 1/2" FINALLY WITH SURSHAKE PRIOR TO BACKFILLING) DO NOT TOUCH ROOTBALL WITH STAKE SPECIFIED PLANTING MIX WATER & TAMP TO REMOVE AIR POCKETS</p>	<p>1 MINIMUM CLEARANCE FOR DOOR OPENING 2 HUNTER CONTROLLER 3 CONTROL WIRE IN ELECTRICAL CONDUIT. SIZE AND TYPE PER LOCAL CODE 4 1/2" POWER SUPPLY CONDUIT CONNECT PER LOCAL CODE</p> <p>NOTE: CONTROLLER SHALL BE HARD-WIRED TO GROUNDED 110 or 220 VAC SOURCE.</p>	<p>FINISH GRADE AIR/VACUUM RELIEF VALVE 6" ROUND VALVE BOX 1/2" PVC COUPLING (1x1) 1/2" SCH 40 RISER (LENGTH AS REQUIRED) BRICK SUPPORTS (THREE) 3/4" GRAVEL SUMP (1 CUBIC FOOT) PVC PIPING AND FITTINGS</p>	<p>Landscape Details</p>	
<p>N Tree Staking</p>	<p>J Controller</p>	<p>F Air Relief Valve</p>	<p>B</p>	
<p>1 MODEL: WIRELESS SOLAR SYNC SENSOR. MOUNT UP TO 800' FROM RECEIVER 2 SUITABLE GUTTER OR FASCIA MOUNT. MOUNT IN LOCATION WHERE SENSOR CAN RECEIVE FULL SUN AND IS OPEN TO RAINFALL, PREFERABLY ON THE SOUTHWEST CORNER 3 WIRELESS SOLAR SYNC RECEIVER MOUNTED ON THE WALL NEXT TO THE CONTROLLER 4 HUNTER CONTROLLER 5 VALVE CONTROL WIRE CONDUIT 6 POWER SOURCE</p>	<p>1 30-INCH LINEAR LENGTH OF WIRE, COILED 2 WATERPROOF CONNECTION: RAIN BIRD DR SERIES (1 OF 2) 3 ID TAG 4 ANTI-SIPHON VALVE: RAIN BIRD 100-40F VALVE (INCLUDED IN 50K2-100-PRO KIT) 5 PRESSURE REGULATING FILTER: RAIN BIRD 100-100-PRO (INCLUDED IN 50K2-100-PRO KIT) 6 PVC SCH 40 LEMON 7 PVC SCH 40 MALE ADAPTER 8 UV RADIATION RESISTANT PVC SCH 40 PIPE (1 OF 2) 9 FINISH GRADE/TOP OF MULCH 10 PVC SCH 40 BELL (1 OF 2) 11 PVC LATERAL PIPE (1 OF 2)</p>	<p>G Remote Control Valve - Drip</p>	<p>C</p>	
<p>O</p>	<p>K Controller with Weather Sensor</p>	<p>G Remote Control Valve - Drip</p>	<p>C</p>	
<p>SECTION VIEW MAINLINE, LATERAL AND WIRING IN THE SAME TRENCH MAINLINE PIPE LATERAL PIPE WIRING IN CONDUIT 18" FOR LATERALS 24" FOR MAINLINE & WIRING PLAN VIEW WIRE W/O CONDUIT</p> <p>RUN WIRING BENEATH AND BESIDE MAINLINE. TAPE AND BUNDLE AT 10-FOOT INTERVALS. ALL SOLVENT WELD PLASTIC PIPING TO BE SNAKED IN TRENCH AS SHOWN. TIE A 24-INCH LOOP IN ALL WIRING AT CHANGES OF DIRECTION OF 30° OR GREATER. UNTIE AFTER ALL CONNECTIONS HAVE BEEN MADE.</p> <p>NOTES: 1. SLEEVE BELOW ALL HARDWARE ELEMENTS WITH SCHEDULE 40 PVC TWICE THE DIAMETER OF THE PIPE OR WIRE BUNDLE WITHIN.</p>	<p>L Trenching</p>	<p>1 FINISH GRADE 2 PVC DRIP MAINLINE PIPE 3 PVC 1" x 2" TRAP UNDER BALL VALVE 4 DASH FIT MALE X BUSH ADAPTER: RAIN BIRD 30FF-M4-075 5 SHIM-CERAMIC BRUSHING 6 12-INCH VALVE BOX WITH CONDUIT 7 RAIN BIRD 100-STD RAIN BIRD 100-STD 1/2" WASHED GRAVEL 8 BRICK (1 OF 2)</p>	<p>H Manual Flush Valve</p>	
<p>P</p>	<p>L Trenching</p>	<p>H Manual Flush Valve</p>	<p>D</p>	

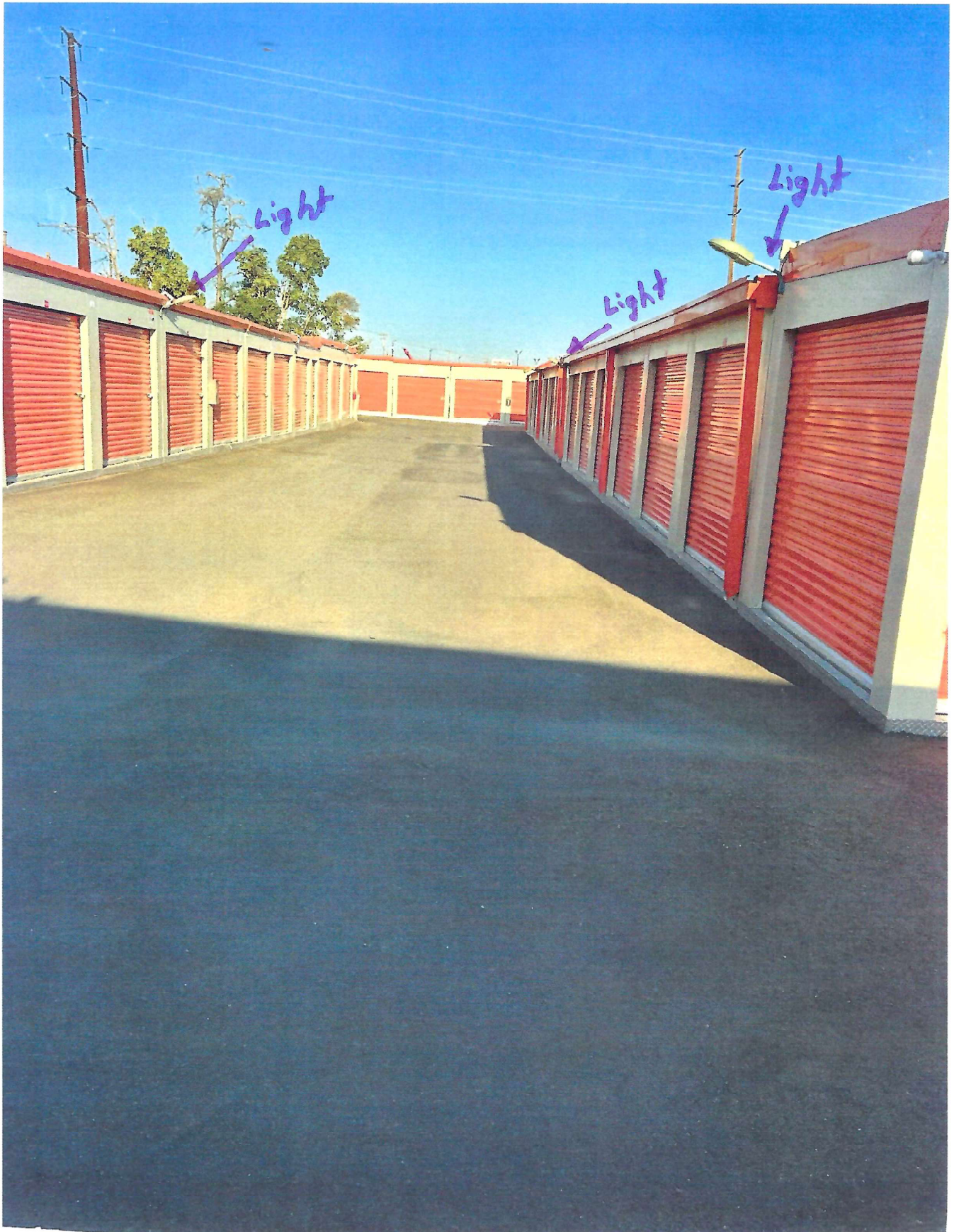
Landscape Details

5024 Rohde Road
Ceres, CA

Scale: no scale
Date: 6-21-23
Drawn: LF
Sheet Number: L3

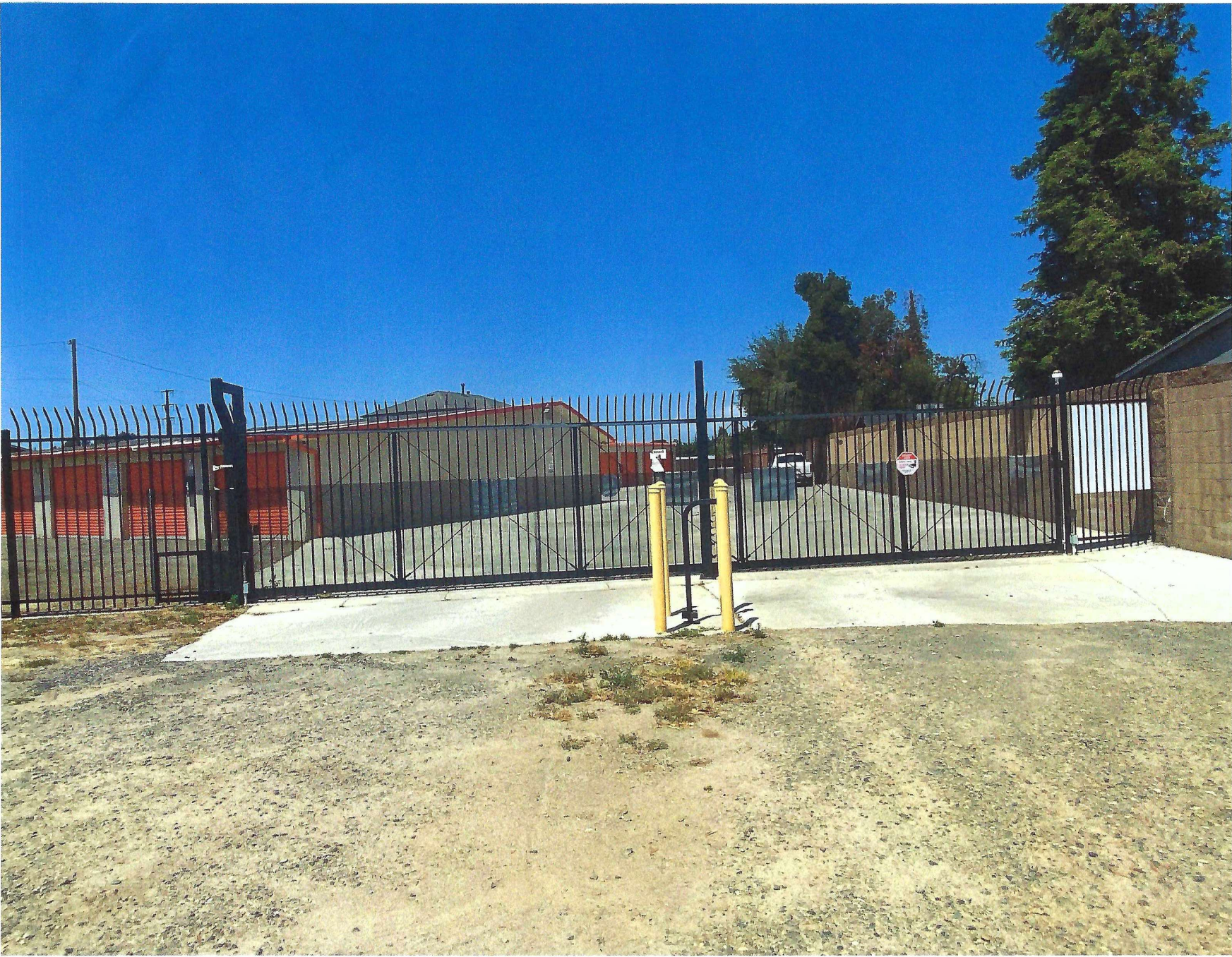
Linda Fish
Landscape Architect
linda@linda-fish.com
916.266.6177
PLA 143125









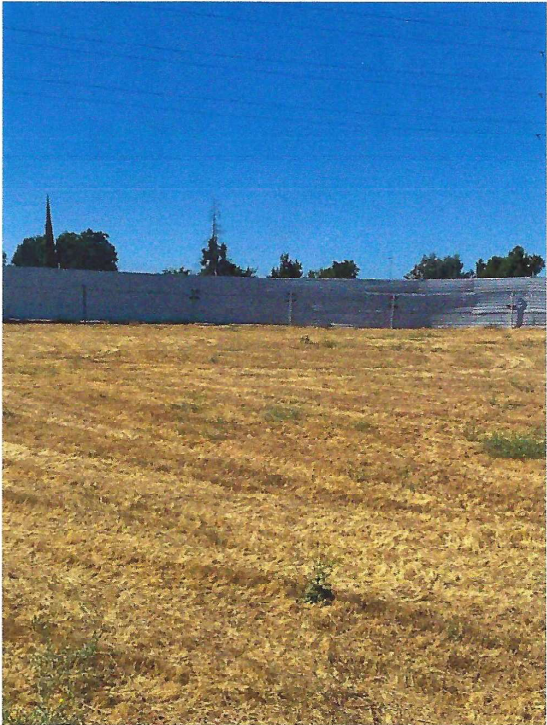




Wood fence is located towards Keyes residential on the right side towards the back portion of the property.



Metal fence is located on the back side of the property.

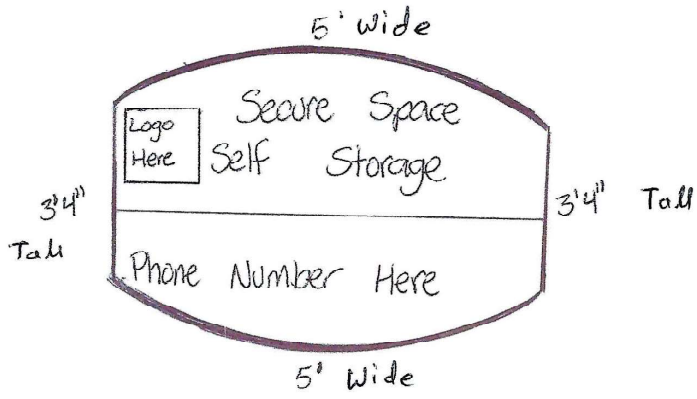


Fencing Detail

Chain link fence is located on the left side of the entrance.



SIGN DETAIL



DEVELOPMENT STANDARDS AND MITIGATION MEASURES

GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2023-0031 SECURED SPACE SELF STORAGE

Department of Planning and Community Development

1. Use(s) shall be conducted as described in the application and supporting information (including the plot plan) as approved by the Board of Supervisors and in accordance with other laws and ordinances.
2. Pursuant to Section 711.4 of the California Fish and Game Code (effective January 1, 2014), the applicant is required to pay a California Department of Fish and Wildlife (formerly the Department of Fish and Game) fee at the time of filing a "Notice of Determination." Within five (5) days of approval of this project by the Planning Commission or Board of Supervisors, the applicant shall submit to the Department of Planning and Community Development a check for **\$2,973.75**, made payable to **Stanislaus County**, for the payment of California Department of Fish and Wildlife and Clerk-Recorder filing fees.

Pursuant to Section 711.4 (e) (3) of the California Fish and Game Code, no project shall be operative, vested, or final, nor shall local government permits for the project be valid, until the filing fees required pursuant to this section are paid.

3. The Department of Planning and Community Development shall record a Notice of Administrative Conditions and Restrictions with the County Clerk-Recorder's Office within 30 days of project approval. The Notice includes: Development Standards and Schedule; any adopted Mitigation Measures; and a project area map.
4. Developer shall pay all Public Facilities Impact Fees and Fire Facilities Fees as adopted by Resolution of the Board of Supervisors. The fees shall be payable at the time of issuance of a building permit for any construction in the development project and shall be based on the rates in effect at the time of building permit issuance.
5. The applicant/owner is required to defend, indemnify, or hold harmless the County, its officers, and employees from any claim, action, or proceedings against the County to set aside the approval of the project which is brought within the applicable statute of limitations. The County shall promptly notify the applicant of any claim, action, or proceeding to set aside the approval and shall cooperate fully in the defense.
6. No operations shall be conducted on any premises in such a manner as to cause an unreasonable amount of noise, odor, dust, smoke, vibration, or electrical interference detectable off the site.
7. During the construction phases of the project, if any human remains, significant or potentially unique, are found, all construction activities in the area shall cease until a qualified archeologist can be consulted. Construction activities shall not resume in the area until an on-site archeological mitigation program has been approved by a qualified

- archeologist. The Central California Information Center shall be notified if the find is deemed historically or culturally significant.
8. The applicant/business owner shall obtain a valid Stanislaus County Business License prior to final of any tenant improvement and/or Certificate of Occupancies. A valid Business License shall be maintained by the occupants at all times.
 9. The applicant will be required to contact and coordinate with the SJVAPCD to obtain any required permits and to conduct any studies required by the District prior to operation.
 10. Pursuant to Section 404 of the Clean Water Act, prior to construction, the developer shall be responsible for contacting the US Army Corps of Engineers to determine if any "wetlands," "waters of the United States," or other areas under the jurisdiction of the Corps of Engineers are present on the project site, and shall be responsible for obtaining all appropriate permits or authorizations from the Corps, including all necessary water quality certifications, if necessary.
 11. Pursuant to the federal and state Endangered Species Acts, prior to construction, the developer shall be responsible for contacting the US Fish and Wildlife Service and California Department of Fish and Game to determine if any special status plant or animal species are present on the project site and shall be responsible for obtaining all appropriate permits or authorizations from these agencies, if necessary.
 12. Building Permits for all unpermitted onsite improvements, including but not limited to the mini storage buildings and the residential conversion to an office, shall be obtained through the Stanislaus County Building Permits Division in conformance with the approved Development Schedule.
 13. Prior to issuance of any building permit, a photometric lighting plan shall be submitted for review and approval by the Planning Department. All exterior lighting shall be designed (aimed down and toward the site) to provide adequate illumination without a glare effect. This shall include, but not be limited to, the use of shielded light fixtures to prevent skyglow (light spilling into the night sky) and the installation of shielded fixtures to prevent light trespass (glare and spill light that shines onto neighboring properties). The height of any freestanding lighting fixtures should not exceed 15 feet above grade.
 14. A landscaping plan, including a mixture of ornamental trees and shrubs along the front of the office and along the road frontage, shall be submitted for review and approval prior to issuance of any building permit. In conformance with the Planned Industrial zoning ordinance (Chapter 21.42) landscaping shall cover a minimum of 5% of the developed portion of the site. Landscape plans shall meet current State of California water use requirements at the time of submittal. The review of the landscape plan shall be subject to applicable County landscape review and inspection fees in effect at the time of review and inspection. Landscaping shall be installed and inspected prior to final of grading or building permit.
 15. All landscaped areas, fences, and walls shall be maintained in an attractive condition and in compliance with the approved final landscape and irrigation plan. The premises shall be kept free of weeds, trash, and other debris. Dead or dying plants shall be replaced

- with materials of equal size and similar variety within 30 days, at the property owner's expense.
16. A final sign plan for all proposed on-site signs indicating the location, height, area of the sign(s), and message shall be approved by the Planning Director and shall be limited to one monument sign, a maximum of six feet in height and located along the road frontage, and one wall sign located on the office building. The area of the monument sign shall not exceed twelve square feet and the face of the wall sign shall not exceed 5-feet by 3.5-feet-in size. Signage shall be non-flashing, non-animated, and nonmoving. Directional signs are permitted as needed.
 17. A fencing/wall plan shall be submitted to the Planning Department for review and approval prior to issuance of a building permit. All fencing/walls shall be installed prior to issuance of a certificate of occupancy. A masonry wall shall be installed along the portions of the property abutting residential development and the Turlock Irrigation District's (TID) Lateral No. 2 ½. The masonry wall abutting residential uses shall be eight feet in height. The masonry wall located along TID Lateral No. 2 ½ shall meet the TID's standards. The existing fencing along the road frontage of the site may remain, provided it meets setback, vision clearance, and storage depth requirements.
 18. Onsite parking shall meet the standards described in Chapter 21.76 – Off-Street Parking. The mini-storage facility shall meet the County's parking standards for Manufacturing or assembly plants or wholesale warehouses, and the residential uses shall meet the County's parking standards for Dwellings. Parking spaces shall be designed and improved in accordance with the County Department of Public Works Standards and Specifications.
 19. All driveways, drive aisles, including truck drive aisles, truck parking areas, and customer and employee vehicle parking areas shall be paved. Pavement and parking spaces shall be installed in accordance with all applicable Stanislaus County standards.
 20. Trash bins shall be kept in trash enclosures constructed of materials compatible with the architecture of the development. Trash enclosures shall be placed in locations as approved by the refuse collecting agency and the Planning Director. Location and design shall be approved prior to issuance of any building permit.
 21. Development Standards not specified, including but not limited to setbacks, height limits, and lot coverage limits, shall be in conformance with Chapter 21.42 – Planned Industrial of the Stanislaus County Zoning Ordinance.
 22. If the two Assessor Parcel Numbers included in the project description are determined to be separate legal parcels, a Merger shall be completed prior to issuance of a building permit.

Department of Public Works

23. No parking, loading or unloading of vehicles will be permitted within the County road right-of-way.

24. The developer will be required to install or pay for the installation of any signs and/or markings, if warranted.
25. An Encroachment Permit shall be obtained for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right of way. Driveway Approaches shall be installed per Stanislaus County Public Works Standards and Specifications Plate 3-G3, Commercial Driveways.
26. The storage depth outside of any gate shall be adequate for vehicles coming off the road. The entry vehicles shall not block any travel lane or shoulder. If the storage depth is inadequate, it may require that the fence be moved further into the property.
27. A grading, drainage, and erosion/sediment control plan for the project site shall be submitted for any building permit that will create a larger or smaller building footprint. The grading and drainage plan shall include the following information:
 - a. The plan shall contain drainage calculations and enough information to verify that runoff from project will not flow onto adjacent properties and Stanislaus County road right-of-way. Public Works will review and approve the drainage calculations.
 - b. For projects greater than one acre in size, the grading drainage and erosion/sediment control plan shall comply with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. A Waste Discharge Identification Number (WDID) and a copy of the Notice of Intent (NOI) and the project's Storm Water Pollution Prevention Plan (SWPPP) shall be provided prior to the approval of any grading, if applicable.
 - c. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for review of the grading plan.
 - d. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for all on-site inspections. The Public Works inspector shall be contacted 48 hours prior to the commencement of any grading or drainage work on-site.

Department of Environmental Resources

28. Prior to building permit final, the applicant(s) shall demonstrate and secure any necessary permits for the destruction of all onsite wastewater treatment systems (OWTS) and/or water wells impacted or proposed by this project, under the direction of the Stanislaus County Department of Environmental Resources (DER).
29. All applicable County Local Agency Management Program (LAMP) standards and required setbacks are to be met.

Building Permits Division

30. Building permits are required and the project must conform with the California Code of Regulations, Title 24. Building permits shall be obtained within the timeframe specified in the Development Schedule.

Keyes Community Services District

31. All water service line connections must be installed to District standards and according to plans approved by the District, at the expense of the owner.
32. All applicable District connections, facilities and inspection fees must be paid upon application for connections.
33. The applicant/operator shall comply with all District rules and regulations.
34. A new will-serve letter is required if connection is not initiated before August 22, 2024.
35. Prior to connection Local Agency Formation Commission (LAFCO) approval is required.
36. Water and sewer connection plans shall be submitted to and approved by the District.

Turlock Irrigation District (TID)

37. Prior to issuance of a building permit, the applicant shall consult with the district to determine if additional right-of-way is required to be dedicated for District Lateral No. 2 ½. The District's Upper Lateral 2.5 has a 70-foot wide right of way.
38. Concurrent with any building permit a masonry wall shall be constructed along the portions of the site that abut the District's Lateral No. 2 ½. District standards require that developments adjoining District canals shall construct a masonry or concrete wall adjacent to the canal per CS 166. It will be necessary for the developer to submit plans detailing the existing and proposed site improvements relative to the District's canal, in order for the District to determine specific impacts and requirements along the canal. District requirements shall be implemented into the construction and maintenance of the wall.
39. There are two side gates in the canal that serve(d) the subject parcels. One is located behind the Apartment 1& 2 building, and the other is adjacent to the undeveloped area of the parcel. District standards require that irrigation facilities that are no longer used shall be removed. Prior to issuance of a building permit, the Developer shall remove the side gates from the canal per District requirements. The developer will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. There is a District Board approved time and material fee associated with this review.
40. Any improvements to this property which impact irrigation facilities shall be subject to the District's approval and meet all District standards and specifications.
41. Work on irrigation facilities shall only be performed during the non-irrigation season which typically runs from November 1, thru March 1, but can vary. Approval from TID to work on facilities shall be obtain in advance of any work occurring.

Local Agency Formation Commission (LAFCO)

42. LAFCO approval of an annexation must be obtained prior to the extension of sewer and water services by the Keyes Community Services District.

Mitigation Measures

43. New multistory development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.
44. New development shall include cut-off luminaries and/or shields. All exterior lighting shall be designed (aimed down and towards the site) to provide adequate illumination without a glare effect. Low intensity lights shall be used to minimize the visibility of the lighting from nearby areas, and to prevent “spill over” of light onto adjacent residential properties.
45. Pre-construction surveys for Valley Elderberry Longhorn Beetle (VELB) on the site shall be conducted by a qualified biologist, in accordance with any applicable United States Fish and Wildlife protocols. Prior to the removal of any elderberry shrubs, the applicant shall obtain concurrence from US Fish and Wildlife Service regarding removing the shrubs. Prior to securing concurrence to remove the blue elderberry shrubs, the shrubs shall be protected with a no-disturbance buffer extending 10 feet from the driplines of the shrubs. Construction in the vicinity of the blue elderberry shrubs should occur between June 15 and April 15. During this time period, VELB (if present) would be within the interior portion of the stems of the shrubs and would not move (i.e., fly or walk) into the construction area.
46. If ground disturbing activity or construction commences between March 1 and September 15, pre-construction surveys for nesting Swainson’s hawks (SWHA) shall be conducted by a qualified biologist. SWHA surveys shall be conducted a maximum of 10 days prior to the onset of grading or construction activities, within 0.5 miles of the project site area, in accordance with protocol developed by the Swainson’s Hawk Technical Advisory Committee (SWHA TAC, 2000). If active nests are found, a qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the need (if any) for temporal restrictions on construction, including but not limited to a minimum no-disturbance buffer of 0.5 miles to be maintained around active nests prior to and during any ground-disturbing activities until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If take cannot be avoided, take authorization through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. The determination shall utilize criteria set forth by CDFW (CDFG, 1994).
47. If construction commences between February 1 and August 31, pre-construction surveys for burrowing owls on the site shall be conducted. If occupied burrows are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. The determinations shall be pursuant to criteria set forth by CDFW (CDFG, 2012).
48. Trees, shrubs, and grasslands in the site could be used by other birds protected by the Migratory Bird Treaty Act of 1918. If vegetation removal or construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for nesting birds shall be completed. If active nests are found, work in the vicinity of the nest shall be delayed until the young fledge.

49. All oak trees over four inches in diameter shall be preserved to the maximum extent practical. Final development plans shall depict all oak trees proposed for removal. If oak trees four inches in diameter or more exist on the project site, the applicant shall submit a tree preservation plan to the Stanislaus County Planning Division for review and approval. The tree preservation plan shall include the following:
- Any removed oak trees shall be replaced at a two-to-one tree replacement ratio.
 - The tree preservation plan shall include the location, number, species, and size of proposed replacement plantings.
 - The tree preservation plan shall include monitoring provisions for watering and landscaping to ensure survival and health of planted oak trees.
 - Replacement trees shall be monitored for a period no less than 5 years after replacement trees have been planted; Dead or dying trees shall be replaced.
50. Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.
51. Hours of construction on the project site shall be limited to 7:00 a.m. to 6:00 p.m. Monday thru Friday, with no construction allowed on holidays.
52. Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors. All construction equipment shall be fitted with properly functioning mufflers.
53. Prior to issuance of a building permit, the applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for the proposed land uses per the Keyes Community Plan fee program adopted at the time of building permit issuance. These fees are adjusted for inflation using the Engineering News-Record construction cost index and shall be paid prior to building permit issuance.

*Please note: If Conditions of Approval/Development Standards are amended by the Planning Commission or Board of Supervisors, such amendments will be noted in the upper right-hand corner of the Conditions of Approval/Development Standards; new wording is in **bold**, and deleted wording will have a ~~line through it~~.*

DEVELOPMENT SCHEDULE

GENERAL PLAN AMENDMENT AND REZONE APPLICATION NO. PLN2023-0031 SECURED SPACE SELF STORAGE

- Within six months of project approval, the applicant shall apply for and be issued Building Permits for all unpermitted on-site improvements, including but not limited to the mini-storage buildings and the residential conversion to an office, with the Stanislaus County Building Permits Division.
- Building Permits shall be finalized and a Certificate of Occupancy issued within one year of project approval.
- Issuance of a building permit or certificate of occupancy after these time frames may be approved subject to a staff approval permit provided the Planning Director finds that the applicant/operator has been actively working towards issuance of the permit and has shown due diligence in progressing the permitting forward.



CEQA INITIAL STUDY

(Additional text is shown in bold and underline and deleted text in ~~strikeout~~.)

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

- 1. **Project title:** General Plan Amendment and Rezone Application No. PLN2023-0031 – Secured Space South Storage SCH No. 2023090214
- 2. **Lead agency name and address:** Stanislaus County
1010 10th Street, Suite 3400
Modesto, CA 95354
- 3. **Contact person and phone number:** Kristin Doud, Deputy Director of Planning
(209) 525-6330
- 4. **Project location:** 5024, 5028, and 5030 Rohde Road, between Esmar and Faith Home Roads, in the community of Keyes. (APN: 041-059-001 & 041-059-002).
- 5. **Project sponsor’s name and address:** Sakshi Enterprise, LLC., Biren Patel
2801 Mitchell Road, #3074
Ceres, CA 95307
- 6. **General Plan designation:** Planned Development
- 7. **Community Plan designation:** Medium Density Residential
- 8. **Zoning:** General Agriculture (A-2-10)
- 9. **Description of project:**

This is a request to amend the Community Plan designation and zoning designation of a five-acre parcel from Medium Density Residential and General Agriculture (A-2-10) to Planned Development (P-D) to allow for the operation of an existing mini-storage facility. The General Plan designation is Planned Development which is consistent with the proposed project and will remain unchanged; however, the Keyes Community Plan designation of Medium-Density Residential is not consistent with the proposed project and is proposed to be amended to Planned Development which requires an amendment to the Land Use Element of the General Plan. The site consists of 39,393 square feet of mini-storage made up of 13 buildings, nine feet three inches in height with mounted wall lighting, each containing multiple storage units ranging from 50 to 253 square feet in size. The mini-storage facility is currently operating; however, the required building permits and land use entitlements to operate were not obtained. Accordingly, land use entitlements (in the form of a general plan amendment and rezone) and building permits are required to allow continued operation of the mini-storage facility. The property is also improved with a legal non-conforming duplex and four-plex, which are proposed to remain, as well as the single-family dwelling which has been converted into an office for the mini-storage facility. Conversion of the single-family dwelling also occurred without building permits which will be required to be obtained to allow the continued use of the building as an office/apartment.

Approximately four of the five acres is currently developed with the mini-storage and residential units and the remaining one-acre of the site is vacant and unimproved. In addition to the mini-storage, office, and residential units the property

is improved with 24 parking spaces, chain link fencing with slats along the portion of road frontage where the residential units are located and wrought iron fencing with a secured access gate along the portion of road frontage where the mini-storage facility is located; a mixture of wood and metal fencing is installed along the side and rear property lines. The project proposes to install a mixture of ornamental trees and shrubs along the front of the office and residential units and a pole sign ten feet in height with a 5-foot-wide and 3.5-foot-tall sign for the mini-storage facility as well as a wall sign on the office building. The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. The site is currently served by a private on-site well and septic systems; however, a will-serve letter has been issued by the Keyes Community Services District for water and sewer services.

- 10. **Surrounding land uses and setting:** RV storage facility and mobile home park to the north; State Route 99 to the west and south; residential development and the Community of Keyes to the east and southeast.

- 11. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** San Joaquin Valley Air Pollution Control District
Stanislaus County Department of Public Works
Stanislaus Local Agency Formation Commission
Keyes Community Services District
California Department of Toxic Substances Control

- 12. **Attachments:**
 - 1. Central California Information Center records search, dated February 10, 2023
 - 2. Mitigation Monitoring and Reporting Program (MMRP) for the Keyes Community Plan, adopted April 18, 2000 (MMRP Keyes)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)
 On the basis of this initial evaluation:

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

Signature on File.
 Prepared by Kristin Doud, Deputy Director

12/15/2023 (Amended February 2, 2024)
 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 site itself is not considered to be a scenic resource or unique scenic vista. Approximately four of the five acres is currently developed with the mini-storage and residential units and the remaining one-acre of the site is vacant and unimproved. In addition to the mini-storage, office, and residential units the property is improved with 24 parking spaces, chain link fencing with slats along the portion of road frontage where the residential units are located and wrought iron fencing with a secured access gate along the portion of road frontage where the mini-storage facility is located; a mixture of wood and metal fencing is installed along the side and rear property lines. The project proposes to install a mixture of ornamental trees and shrubs along the front of the office and residential units and a pole sign ten feet in height with a 5-foot-wide and 3.5-foot-tall sign for the mini-storage facility as well as a wall sign on the office building.

The site is located within the Keyes Community Plan. The Keyes Community Plan, adopted by the Board of Supervisors in April of 2000, identifies the project site as a Gateway area to Keyes, visible from State Route 99, that should be designed and landscaped to improve and enhance the appearance of the site and area. There is no existing design criteria for the Keyes Community; however, the Keyes Community Plan encourages attractive and orderly development which preserves a small town atmosphere; the development of large, non-residential sites, with generous landscaping and Highway Commercial type uses along State Route 99/Keyes Road Interchange; the development of “Gateway” treatments and positive, high quality landscaped edges along State Route 99 and major roads. To meet this requirement landscaping along the project site’s road frontage will be required to be installed.

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

Mitigation:

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

References: Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; 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 site is not currently in agricultural production and is not enrolled in a Williamson Act Contract. Approximately four acres of the five-acre site is currently developed with the mini-storage and residential units and the remaining one-acre of the site is vacant and unimproved. The USDA Natural Resources Conservation Service’s Eastern Stanislaus County Soil Survey indicates that 55 percent of the property is made up of Hanford sandy loam (HdA), with a Story Index Rating of 95 and a Grade of 1. The remaining 45 percent of the project site is made up of Tujunga loamy sand (TuA), which has a Story Index Rating of 76 and a Grade of 2. The Grade and Story Index Ratings of the soils qualify as prime soils. However, the California Department of Conservation’s Important Farmland Maps identifies the site as Urban and Built-Up Land.

An RV storage facility and mobile home park are located north of the project site; State Route 99 to the west and south; a residential development and the Community of Keyes to the east and southeast. The nearest agricultural parcel, north across the TID Lateral No. 2 ½, is 6+ acres in size and is utilized for irrigated pasture. The nearest surrounding production agricultural lands are located 1,000+ feet from the project site, across State Highway 99, to the south and east (enrolled in Williamson Act Contracts) and 1,200+ feet from the project site to the east (not under a Williamson Act Contract).

All new or expanding uses approved by discretionary permit in the A-2 zoning district or on a parcel adjoining the A-2 zoning district are required to incorporate a minimum 150-foot-wide agricultural buffer setback, or 300-foot-wide buffer setback for people-intensive uses. Public roadways, utilities, drainage facilities, rivers and adjacent riparian areas, landscaping, parking lots, and similar low people intensive uses are permitted uses within the buffer setback area. The nearest A-2 zoned property is located 300+ feet to the northeast and southwest of the project site, which meets the 300-foot agricultural buffer requirement.

A referral response received from the Turlock Irrigation District (TID) indicated that TID’s Upper Lateral 2.5 is located along the northern side of the project site, which has a 70-foot-wide right-of-way. If the half width of the canal’s right-of-way has not been formally dedicated, dedication will be required. TID’s response also requested that a masonry wall be constructed adjacent to the canal, in conformance with TID standards. Furthermore, TID’s response requires that irrigation facilities that are no longer used, which includes two irrigation side gates located behind the Apartment 1 and 2 buildings, be removed in accordance with TID standards. TID’s response indicated that any improvements to the property that impacts TID facilities must meet District standards and be approved by the District. The developer will be required to submit irrigation improvement plans and enter into an Irrigation Improvement Agreement prior to completing the required irrigation facility modifications, which includes a TID Board approved time and material fee associated with the review. Additionally, any work on District irrigation facilities may only occur during the non-irrigation season which typically runs from November 1, through March 1, but can vary.

The site is located within the Keyes Community Plan. The Mitigation Monitoring Plan (MMP) included in the EIR prepared for the Keyes Community Plan required that farmland mitigation be provided to address the conversion of Prime Farmland to non-agricultural use on areas identified as “prime” or “important” farmland. The project site is identified as “urban and built up” on the California Farmland Mapping Program and Keyes EIR Farmland maps and accordingly the farmland mitigation has not been applied to the project.

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

Mitigation: None.

References: Application materials; Referral response from Turlock Irrigation District (TID), dated September 26, 2023; Keyes Community Plan, EIR and MMRP adopted April 2000; United States Department of Agriculture NRCS Web Soil Survey; California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Stanislaus County General Plan; and Support Documentation¹.

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

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

as “extreme non-attainment” for ozone, “attainment” for respirable particulate matter (PM-10), and “non-attainment” for PM 2.5, as defined by the Federal Clean Air Act.

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

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations a project’s vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces. No construction is proposed, but if construction were to occur in the future all applicable Air District permits would be required to be obtained and all District standards will be required to be met.

The project was referred to SJVAPCD, who did not respond. The SJVAPCD’s Small Project Analysis Level (SPAL) Analysis indicates that the minimum threshold of significance for industrial projects is 1,506 trips per day. The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. Accordingly, the project will create an average of 12 round trips per day, which is below the District’s thresholds of significance for emissions.

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding air impacts associated with construction and the operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained, and that California Green Building Code be met.

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

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

Mitigation: None.

References: Application materials; Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; and the Stanislaus County General Plan; and Support Documentation¹.

IV. BIOLOGICAL RESOURCES -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		X		

Discussion: The project is located within the Ceres Quad of the California Natural Diversity Database (CNDDDB). There are nine animal species which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern within the Ceres CNDDDB Quad. Animal species include Swainson's hawk (SWHA), tricolored blackbird, burrowing owl, ruffle sculpin, hardhead, chinook salmon - Central Valley fall / late fall-run ESU, valley elderberry longhorn beetle, and Townsend's big-eared bat. CNDDDB data shows a record of obscure bumble bee .64 miles northwest of the site, heartscale 2 miles southeast of the site, and two Swainson hawk records (one 3.5 miles southeast and the other is located 3.3 miles north of the project site).

An EIR was prepared for the Keyes Community Plan Update, which was adopted by the Board of Supervisors on April 18, 2000. A Mitigation Monitoring and Reporting Program for the Keyes Community Plan includes mitigation measures related to biological resources; specifically, regarding potential impacts to wetlands, valley elderberry longhorn beetle (VELB), Swainson's hawk and other raptors, oak trees, and special status species associated with valley grassland habitats. Based on the location and lack of suitable habitat on-site, the likelihood for special status species to exist on-site are very low. However, mitigation measures, as recommended by the survey and applicable mitigation measures as incorporated into the Mitigation Monitoring and Reporting Program of the Keyes Community Plan are incorporated below. An early consultation referral response was sent to the California Department of Fish and Game (CDFG); however, no response has been received to date. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. Impacts to biological resources are considered to be less than significant with mitigation.

Mitigation:

3. Pre-construction surveys for Valley Elderberry Longhorn Beetle (VELB) on the site shall be conducted by a qualified biologist, in accordance with any applicable United States Fish and Wildlife protocols. Prior to the removal of any elderberry shrubs, the applicant shall obtain concurrence from US Fish and Wildlife Service regarding removing the shrubs. Prior to securing concurrence to remove the blue elderberry shrubs, the shrubs shall be protected with a no-disturbance buffer extending 10 feet from the driplines of the shrubs. Construction in the vicinity of the blue elderberry shrubs should occur between June 15 and April 15. During this time period, VELB (if present) would be within the interior portion of the stems of the shrubs and would not move (i.e., fly or walk) into the construction area.
4. If ground disturbing activity or construction commences between March 1 and September 15, pre-construction surveys for nesting Swainson's hawks (SWHA) shall be conducted by a qualified biologist. SWHA surveys shall be conducted a maximum of 10 days prior to the onset of grading or construction activities, within 0.5 miles of the project site area, in accordance with protocol developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC, 2000). If active nests are found, a qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the need (if any) for temporal restrictions on construction, including

but not limited to a minimum no-disturbance buffer of 0.5 miles to be maintained around active nests prior to and during any ground-disturbing activities until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If take cannot be avoided, take authorization through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. The determination shall utilize criteria set forth by CDFW (CDFG, 1994).

5. If construction commences between February 1 and August 31, pre-construction surveys for burrowing owls on the site shall be conducted. If occupied burrows are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. The determinations shall be pursuant to criteria set forth by CDFW (CDFG, 2012).
6. Trees, shrubs, and grasslands in the site could be used by other birds protected by the Migratory Bird Treaty Act of 1918. If vegetation removal or construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for nesting birds shall be completed. If active nests are found, work in the vicinity of the nest shall be delayed until the young fledge.
7. All oak trees over four inches in diameter shall be preserved to the maximum extent practical. Final development plans shall depict all oak trees proposed for removal. If oak trees four inches in diameter or more exist on the project site, the applicant shall submit a tree preservation plan to the Stanislaus County Planning Division for review and approval. The tree preservation plan shall include the following:
 - Any removed oak trees shall be replaced at a two to one tree replacement ratio.
 - The tree preservation plan shall include the location, number, species, and size of proposed replacement plantings.
 - The tree preservation plan shall include monitoring provisions for watering and landscaping to ensure survival and health of planted oak trees.
 - Replacement trees shall be monitored for a period not less than 5-years after replacement trees have been planted; Dead or dying trees shall be replaced.

References: Application materials; California Department of Fish and Wildlife’s Natural Diversity Database Quad Species List; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18, for a 90-day review period. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. No responses from the tribal contacts were received. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related

activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Central California Information Center Report for the project site, dated February 10, 2023; Stanislaus County General Plan; and Support Documentation¹.

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

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

The project was referred to SJVAPCD, who did not respond. The SJVAPCD’s Small Project Analysis Level (SPAL) Analysis indicates that the minimum threshold of significance for industrial projects is 1,506 trips per day. The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. Accordingly, the project will create an average of 12 round trips per day, which is below the District’s thresholds of significance for emissions.

The site is proposed to be served by the Turlock Irrigation District (TID) for electrical services. The project was referred to TID and they responded with no comments specific to on-site electric facilities.

No construction is proposed, but if construction were to occur in the future all applicable Air District permits would be required to be obtained and all Districts standards will be required to be met. Additionally, any future construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State’s mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives.

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

The site is located within the Keyes Community Plan. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding impacts to air quality during construction and operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained and that California Green Building Code be met.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response from Turlock Irrigation District (TID), dated September 26, 2023; Referral response received from the Department of Public Works, dated October 20, 2023; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan; and Support Documentation¹.

VII. GEOLOGY AND SOILS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
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: Approximately four of the five-acre site is currently developed with the mini-storage and residential units and the remaining one-acre of the site is vacant and unimproved. The USDA Natural Resources Conservation Service's Eastern Stanislaus County Soil Survey indicates that 55 percent of the property is made up of Hanford sandy loam (HdA) and the remaining 45 percent of the project site is made up of Tujunga loamy sand (TuA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the

Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. This will be evaluated with the building permit process which is required as a development standard applied to the project.

The Department of Public Works reviewed the project and responded that a grading and drainage plan shall be submitted for review and approval which includes drainage calculations that verify compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The project proposes to connect to the Keyes Community Services District for public sewer services, and to maintain storm drainage on-site through a storm drain basin. When the site connects to Keyes CSD the existing on-site well and septic systems are required to be destroyed in accordance with DER standards.

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the preparation of geotechnical reports and regarding septic systems prior to construction to ensure that they are developed appropriately based on the project site’s soil type. Although the project has received a will-serve letter from the Keyes CSD for public sewer services, a referral response received from DER indicated that if the project is unable to connect to the public sewer system the site would be subject to installing a Measure X septic system that would be required to meet all DER standards, including LAMP setbacks. DER’s requirements will be applied to the project as a development standard, not a mitigation measure, as the requirements are regulatory.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; Referral response received from the Department of Environmental Resources, dated September 26, 2023; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Title 24 California Code of Regulations; Stanislaus County General Plan; and Support Documentation¹.

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

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

The project was referred to SJVAPCD, who did not respond. The SJVAPCD’s Small Project Analysis Level (SPAL) Analysis indicates that the minimum threshold of significance for industrial projects is 1,506 trips per day. The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open

Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. Accordingly, the project will create an average of 12 round trips per day, which is below the District’s thresholds of significance for emissions.

No construction is proposed, but if construction were to occur in the future all applicable Air District permits would be required to be obtained and all Districts standards will be required to be met. Additionally, any future construction must meet California Green Building Standards Code (CALGreen Code), which includes mandatory provisions applicable to all new residential, commercial, and school buildings. The intent of the CALGreen Code is to establish minimum statewide standards to significantly reduce the greenhouse gas emissions from new construction. The Code includes provisions to reduce water use, wastewater generation, and solid waste generation, as well as requirements for bicycle parking and designated parking for fuel-efficient and carpool/vanpool vehicles in commercial development. It is the intent of the CALGreen Code that buildings constructed pursuant to the Code achieve at least a 15 percent reduction in energy usage when compared to the State’s mandatory energy efficiency standards contained in Title 24. The Code also sets limits on VOCs (volatile organic compounds) and formaldehyde content of various building materials, architectural coatings, and adhesives.

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

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included several mitigation measures regarding air quality impacts from construction and operation of projects developed within the Keyes Community Plan to ensure Air District standards are met. However, the mitigation measures identified in the Keyes Community Plan MMRP are already required to be met through applicable Air District permitting and through enforcement of the California Building Code. Accordingly, Air Quality requirements are not applied as mitigation, but instead will be applied as development standards applicable to the project, which require that all applicable Air District permits be obtained and that California Green Building Code be met.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; 2016 California Green Building Standards Code Title 24, Part 11(Cal Green); 2016 California Energy Code Title 24, Part 6; State of California - Office of Planning and Research (OPR) guidelines regarding VMT significance under CEQA; Stanislaus County General Plan; and Support Documentation¹.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

Discussion: The project was referred to the DER Hazardous Materials (Haz Mat) Division who responded saying they had no comments. Per the application, the operation will not include or generate any hazardous wastes associated with the project. No dumping or maintenance will occur on-site. If hazardous materials were to be stored on-site, the project would be required to obtain all applicable permits through Haz Mat. The applicant is required to use, store, and dispose of any hazardous materials in accordance with all applicable federal, state, and local regulations. These requirements will be applied to the development standards for the project.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater, which is consumed, and drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Agricultural buffers are intended to reduce the risk of spray exposure to surrounding people. The nearest agricultural parcel, north across the TID Lateral No. 2 1/2, is 6+ acres in size and is utilized for irrigated pasture. However, the ministorage facility is located 300+ feet from this agricultural parcel which meets the County’s agricultural buffer distance for people intensive uses, which this project is not. The project was referred to the Stanislaus County Agricultural Commissioner and no comments have been received to date. The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control or within the vicinity of any airport. The project does not interfere with the Stanislaus County Local Hazard Mitigation Plan, which identifies risks posed by disasters and identifies ways to minimize damage from those disasters. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Keyes Fire Protection District. The project was referred to the District, however no response was received.

The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included several mitigation measures that were specific to hazards and hazardous materials. However, only the non-regulatory mitigation measure to stop work in the event previously unidentified contamination is discovered during construction has been applied to the project as a mitigation measure as the other mitigation measure regarding a Phase 1 or 2 study is based on regulatory requirements. **As a responsible agency, the California Department of Toxic Substances Control has been included as an “Other Responsible Agency” on the Mitigation Monitoring and Reporting Program for this mitigation measure.**

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

Mitigation:

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

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Environmental Resources, dated September 26, 2023; Referral response received from the Department of Environmental Resources – Hazardous Materials Division, dated September 20, 2023; California Department of Toxic Substance Control’s EnviroStor database; Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: The project proposes to hook up to the Keyes CSD for water and sewer services and to maintain storm drainage on-site through a storm drain basin. Keyes CSD provided a will-serve letter that states the project site can hook up to the District for water provided they meet all Keyes CSD standards and obtain annexation approval from the Stanislaus Local Agency Formation Commission. When the site connects to Keyes CSD the existing on-site well and septic systems are required to be destroyed in accordance with DER standards. The project site is located within the West Turlock Subbasin and is covered by the Turlock Subbasin Groundwater Sustainability Management Agency. The Keyes CSD is required to meet any applicable state or regional Groundwater Sustainability Agency requirements. A referral response received from the Department of Environmental Resources (DER) indicating that if the project does not connect to public sewer, that any on-site septic system is required to meet Measure X and LAMP standards for on-site private waste systems. DER reviews and approves septic systems through the building permit process, which takes setbacks, soil type, and water table depth into consideration within the specific design requirements. All of these requirements will be incorporated into the project as development standards.

This project was referred to the Regional Water Quality Control Board (RWQCB) which responded with a list of permitting programs that the project maybe subject to. The Department of Public Works reviewed the project and responded with a request that a grading and drainage plan be submitted for review and approval which includes drainage calculations that verify compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. A referral response received from the Turlock Irrigation District (TID) indicated that TID’s Upper Lateral 2.5 is located along the northerly side the project site, which has a 70-foot-wide right-of-way. If the half width of the canal’s

right-of-way has not been formally dedicated, dedication will be required. TID’s response also requested that a masonry wall be constructed adjacent to the canal, in conformance with TID standards. Furthermore, TID’s response requires that irrigation facilities that are no longer used, which includes two irrigation side gates located behind the Apartment 1 and 2 buildings, be removed in accordance with TID standards. TID’s response indicated that any improvements to the property that impacts TID facilities must meet District standards and be approved by the District. The developer will be required to submit irrigation improvement plans and enter into an Irrigation Improvement Agreement prior to completing the required irrigation facility modifications, which includes a TID Board approved time and material fee associated with the review. Additionally, any work on District irrigation facilities may only occur during the non-irrigation season which typically runs from November 1 through March 1, but can vary. These requirements will be applied to the development standards required for project implementation. Additionally, a development standard will be applied to the project that requires the landscaping plans comply with the California State Water Model Ordinance.

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

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding hydrology and water quality and to ensure septic systems are developed appropriately based on the project site’s soil type; however, the mitigation measures are all covered by regulatory requirements which will be enforced through the review of grading and building permits required to be obtained as development standards required to be met for project implementation.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; Referral response from Turlock Irrigation District (TID), dated September 26, 2023; Referral response received from the Department of Environmental Resources, dated September 26, 2023; Referral response received from the Regional Water Quality Control District, dated September 26, 2023; Will-serve letter received from the Keyes Community Services District, dated January 3, 2022; Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: This is a request to amend the Community Plan designation and zoning designation of a five-acre parcel from Medium Density Residential and General Agriculture (A-2-10) to Planned Development (P-D) to allow for the operation of an existing mini-storage facility. The General Plan designation is Planned Development which is consistent with the proposed project and will remain unchanged; however, the Keyes Community Plan designation of Medium-Density Residential is not consistent with the proposed project and is proposed to be amended to Planned Development which requires an amendment to the Land Use Element of the General Plan. The site consists of 39,393 square feet of mini-

storage made up of 13 buildings, nine feet three inches in height with mounted wall lighting, each containing multiple storage units ranging from 50 to 253 square feet in size. The mini-storage facility is currently operating; however, the required building permits and land use entitlements to operate were not obtained. Accordingly, land use entitlements (in the form of a general plan amendment and rezone) and building permits are required to allow continued operation of the mini-storage facility. The property is also improved with a legal non-conforming duplex and four-plex, which are proposed to remain, as well as the single-family dwelling which has been converted into an office for the mini-storage facility. Conversion of the single-family dwelling also occurred without building permits which will be required to be obtained to allow the continued use of the building as an office/apartment.

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

Policy 26 and 27 of the Land Use Element of the Stanislaus County General Plan requires city support of projects located within a city sphere of influence (SOI) and consultation with cities when a project is located within one mile of a city SOI and within the City’s General Plan area. Though the project does not meet either requirement for city referral, the project does propose to hook up to Keyes CSD for public sewer services which is provided with support from the City of Turlock. Accordingly, the project was referred to the City of Turlock for comment. A referral response received from the City of Turlock indicated they had no comments on the project.

The project is located within the Keyes Community Plan; the Mitigation Monitoring and Reporting Program for the Keyes Community Plan included mitigation measures addressing lighting, air quality, hydrology, hazardous materials, noise, biological resources, agricultural resources, traffic, public facilities, fire and school fees, and geology and soils. All of the mitigation measures applicable to the project, that are not already covered by regulatory programs or permitting, which will be required through the application of development standards, have been applied to the project. Those mitigation measures have been incorporated into the Aesthetics, Biological Resources, Hazards and Hazardous Materials, Noise, and Transportation Sections of this initial study. Additionally, requirements of the Keyes Community Plan regarding frontage landscaping and a reservation for a future pedestrian and biking path adjacent to the TID Lateral 2 ½ will also be incorporated into the project requirements.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the City of Turlock, dated September 14, 2023; Referral response received from the Stanislaus Local Agency Formation Commission (LAFCO), dated September 20, 2023; Will-serve letter received from the Keyes Community Services District, dated August 21, 2023; Stanislaus County General Plan; and Support Documentation¹.

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

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

No significant impacts related to Mineral Resources have been identified.

Mitigation: None.

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

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

Discussion: The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. Accordingly, the project will create an average of 12 round trips per day. The Stanislaus County General Plan Noise Element identifies daytime (7:00 a.m. to 10:00 p.m.) maximum allowable average noise exposure for stationary noise sources to be an hourly average of 55 decibels and maximum level of 75 decibels, and nighttime (10:00 p.m. to 7:00 a.m.) to be an hourly average of 45 decibels and maximum of 65 decibels, measured at residential or other noise-sensitive land use on neighboring properties. The Stanislaus County General Plan identifies noise levels up to 75 dB Ldn (or CNEL) as the normally acceptable level of noise environment for industrial, manufacturing, utilities, and agriculture uses. The site itself is impacted by the noise generated from State Route 99. No construction is proposed, but if construction were to occur in the future noise associated with the construction work would be required to meet the noise ordinance and Noise Element standards.

The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included several mitigation measures that were specific to noise. Those mitigation measures applicable to the project which have to do with mitigating potential noise impacts during construction have been applied to the project.

The site is not located within an airport land use plan. Noise impacts are considered to be less-than significant with mitigation included.

Mitigation:

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

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County Noise Control Ordinance, General Plan, and Support Documentation¹.

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

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

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

Mitigation: None.

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

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

Discussion: The project site is served by the Keyes Fire District for fire protection services, the Keyes Union and Turlock Unified school districts for school services, the Stanislaus County Sheriff Department for police protection, the Keyes Community Services District for public water and sewer, Stanislaus County Parks and Recreation Department for parks facilities, and the Turlock Irrigation District (TID) for power. County adopted Public Facilities Fees, as well as fire and school fees are required to be paid based on the development type prior to issuance of a building permit. Payment of the applicable district fees will be required prior to issuance of a building permit.

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the payment of applicable fire, parks, and public facility fees. Development standards regarding the payment of public facility and fire fees will be applied to the project. Residential subdivisions are required to pay park in lieu fees or to dedicate parkland based on the policies included in the State of California’s Quimby Act and the Stanislaus County’s Conservation and Open Space Element. However, as a highway commercial use the proposed development will only be responsible for paying the parks fees identified in the public facility fee schedules adopted by the Board of Supervisors. Development standards will also require that TID standards be met for the connection to electrical services.

A referral response received from the Turlock Irrigation District (TID) indicated that TID’s Upper Lateral 2.5 is located along the northerly side the project site, which has a 70-foot-wide right-of-way. If the half width of the canal’s right-of-way has not been formally dedicated, dedication will be required. TID’s response also requested that a masonry wall be constructed adjacent to the canal, in conformance with TID standards. Furthermore, TID’s response requires that irrigation facilities that are no longer used, which includes two irrigation side gates located behind the Apartment 1 and 2 buildings, be removed in accordance with TID standards. TID’s response indicated that any improvements to the property that impacts TID facilities must meet District standards and be approved by the District. The developer will be required to submit irrigation improvement plans and enter into an Irrigation Improvement Agreement prior to completing the required irrigation facility modifications, which includes a TID Board approved time and material fee associated with the review. Additionally, any work on District irrigation facilities may only occur during the non-irrigation season which typically runs from November 1, through March 1, but can vary.

The project proposes to hook up to the Keyes CSD for water and sewer services and to maintain storm drainage on-site through a storm drain basin. Keyes CSD provided a will-serve letter that states the project site can hook up to the District for water and sewer provided they first obtain LAFCO approval to annex into the District and provided they meet all Keyes CSD standards. A referral response received from the Department of Environmental Resources (DER) indicated that if the project site was unable to connect to Keyes CSD for sewer services, any on-site septic system would be required to meet Measure X and LAMP standards for on-site private waste systems. When the site connects to Keyes CSD the existing on-site well and septic systems are required to be destroyed in accordance with DER standards. All of these requirements will be incorporated into the project as development standards.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Environmental Resources, dated September 26, 2023; Referral response from Turlock Irrigation District (TID), dated September 26, 2023; Referral response received from the Department of Public Works, dated October 20, 2023; Referral response received from the Stanislaus Local Agency Formation Commission (LAFCO), dated September 20, 2023; Will-serve letter received from the Keyes Community Services District, dated August 21, 2023; Stanislaus County General Plan; and Support Documentation¹.

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

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

The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included a mitigation measure regarding the payment of a fair share towards parks. Non-residential development pays parks fees through the payment of public facilities fees, which are collected during the issuance of a building permit. This requirement will be incorporated into the project as a development standard.

No significant impacts related to Recreation were identified.

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County General Plan; and Support Documentation¹.

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

Discussion: The mini-storage facility has a maximum of three employees on-site per shift (one-shift per day), an average of three customers per day, and is open Monday through Friday from 9:30 a.m. to 5:30 p.m. and Saturday and Sunday from 10 a.m. to 3 p.m. Accordingly, the project will create an average of 12 round trips per day.

A response received from the Department of Public Works indicated that an encroachment permit is required to be obtained for any work in the County road right-of-way and that the developer is required to install or pay for the installation of any signage or marking determined to be needed. Additionally, Public Work’s response stated that all gates shall have a storage depth adequate for all vehicles coming off the road and shall not block any travel lane or shoulder. Parking, loading, or unloading in the County road right-of-way associated with the project is prohibited. A grading, drainage, and erosion/sediment control plan for the project site shall be submitted that includes drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties or Stanislaus County road right-of-way and is in compliance with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. All of these requirements will be applied to the project as development standards.

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

The project site is located within the Keyes Community Plan. The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding the payment of a traffic mitigation fee for roadway projects identified in the Keyes Community Plan. This has been applied to the project as a mitigation measure. Public Facility Fees, which includes funding for the Regional Transportation Impact Fee (RTIF) that provides funding for identified County road projects throughout the County, will be required to be paid prior to issuance of a building permit. Additionally, requirements of the Keyes Community Plan regarding frontage landscaping and a reservation for a future pedestrian and biking path adjacent to the TID Lateral 2 ½ will also be incorporated into the project requirements.

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

Mitigation:

11. Prior to issuance of a building permit, the applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for the proposed land uses per the Keyes Community Plan fee program adopted at the time of building permit

issuance. These fees are adjusted for inflation using the Engineering News-Record construction cost index and shall be paid prior to building permit issuance.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; 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: As this project is a General Plan Amendment it was referred to the tribes listed with the Native American Heritage Commission (NAHC), in accordance with SB 18. No tribes responded with a request for consultation or with any project comments. Tribal notification of the project was not referred to any tribes in conjunction with AB 52 requirements, as Stanislaus County has not received any requests for consultation from the tribes listed with the NAHC. A records search conducted by the Central California Information Center (CCIC) indicated that there are no historical, cultural, paleontological, or archeological resources recorded on-site and that the site has a low sensitivity for the discovery of such resources. A development standard will be added to the project which requires if any cultural or tribal resources are discovered during project-related activities, all work is to stop, and the lead agency and a qualified professional are to be consulted to determine the importance and appropriate treatment of the find. Cultural Impacts are considered to be less-than significant.

Mitigation: None.

References: Application materials; Central California Information Center Report for the project site, dated February 10, 2023; County General Plan and Support Documentation¹.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?			X	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Discussion: Limitations on providing services have not been identified. The project proposes to hook up to the Keyes CSD for water and sewer services and to maintain storm drainage on-site through a storm drain basin. Keyes CSD provided a will-serve letter that states the project site can hook up to the District for water and sewer provided they first obtain LAFCO approval to annex into the District and provided they meet all Keyes CSD standards. A referral response received from the Department of Environmental Resources (DER) indicated that if the project site was unable to connect to Keyes CSD for sewer services, any on-site septic system would be required to meet Measure X and LAMP standards for on-site private waste systems. When the site connects to Keyes CSD the existing on-site well and septic systems are required to be destroyed in accordance with DER standards. All of these requirements will be incorporated into the project as development standards.

A referral response received from the Turlock Irrigation District (TID) indicated that TID’s Upper Lateral 2.5 is located along the northerly side the project site, which has a 70-foot-wide right-of-way. If the half width of the canal’s right-of-way has not been formally dedicated, dedication will be required. TID’s response also requested that a masonry wall be constructed adjacent to the canal, in conformance with TID standards. Furthermore, TID’s response requires that irrigation facilities that are no longer used, which includes two irrigation side gates located behind the Apartment 1 and 2 buildings, be removed in accordance with TID standards. TID’s response indicated that any improvements to the property that impacts TID facilities must meet District standards and be approved by the District. The developer will be required to submit irrigation improvement plans and enter into an Irrigation Improvement Agreement prior to completing the required irrigation facility modifications, which includes a TID Board approved time and material fee associated with the review. Additionally, any work on District irrigation facilities may only occur during the non-irrigation season which typically runs from November 1, through March 1, but can vary.

The Mitigation Monitoring and Reporting Program (MMRP) prepared for the April 2000 update to the Keyes Community Plan included mitigation measures regarding stormwater, water supply and quality, and regarding the preparation of geotechnical reports prior to installation of an on-site septic system. The water supply and sewer services will be provided by Keyes CSD which makes the mitigation regarding on-site well inapplicable. The remaining mitigation measures are being met through the grading and building permit review process, which will be incorporated into the project as a requirement per the development standards applied to the project.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Referral response received from the Department of Public Works, dated October 20, 2023; Referral response from Turlock Irrigation District (TID), dated September 26, 2023; Referral response received from the Department of Environmental Resources, dated September 26, 2023; Referral response received from the Stanislaus Local Agency Formation Commission (LAFCO), dated September 20, 2023; Will-serve letter received from the Keyes Community Services District, dated August 21, 2023; Stanislaus; Stanislaus County General Plan; and Support Documentation¹.



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

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

The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included a mitigation measure regarding the payment of fire district fees. Fire fees are collected prior to the issuance of a building permit. This requirement will be incorporated into the project as a development standard.

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

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan; and Support Documentation¹.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE -	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	

<p>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.)</p>			<p>X</p>	
<p>c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p>			<p>X</p>	

Discussion: The site is currently located along Rhode Road between Moore Road (which is the city limit for the City of Ceres) to the north and Faith Home Road to the south, within the unincorporated community of Keyes, parallel to State Highway 99. The site has a General Plan designation of Planned Development, a Keyes Community Plan designation of Medium Density Residential, and a zoning designation of General Agriculture (A-2-10). There is an existing RV sales facility located adjacent to the project site to the north and a residential subdivision adjacent to the south. There is property zoned general agriculture located northeast of the project site, including a 6.44-acre site that is owned by the property owner who also owns the RV sales site to the north and a 21-acre mobile home park; the mobile home park is the northern boundary for the Keyes Community Plan. A rezone was approved for highway commercial development and another use permit was recently approved for a private truck parking facility southeast of the site within the Keyes Community Plan. Additionally, there are several rezone applications being processed proposing highway commercial development on vacant parcels located southeast of the project site, within the Keyes Community Plan boundary. Agricultural property located outside of the Keyes Community Plan exists to the west, across State Highway 99 and to the northeast past the mobile home park. There are several use permit application requests to establish truck parking operations in the General Agricultural (A-2) zoning districts located southwest across Highway 99 and to the north of the project site. Further development of the Keyes area outside of the existing Community Plan boundary would be subject to what is permitted in their various zoning district or to an amendment of the Keyes Community Plan, which would require environmental review, including a cumulative impact analysis.

The site is developed with 39,393 square feet of mini-storage made up of 13 buildings which were developed without building permits or land use permits being obtained. A rezone is required to change the zoning designation from A-2-10 to Planned Development in order to approve development of the site with non- agricultural uses. A general plan amendment to change the Community Plan designation from Medium Density Residential to Planned Development to allow for commercial uses is also required to allow for continued operation of the ministorage facility. If the land use entitlement request is approved, building and grading permits will be required to be obtained. The property is also improved with a legal non-conforming duplex and four-plex, which are proposed to remain, as well as the single-family dwelling which has been converted into an office for the mini-storage facility. Conversion of the single-family dwelling also occurred without building permits which will be required to be obtained to allow the continued use of the building as an office/apartment.

The project is proposed to be served with public water and sewer by the Keyes Community Services District (CSD). They have received a will-serve letter and will be required to get LAFCO approval, meet all Keyes CSD standards, and pay all applicable connection fees prior to connecting to the system for services. All stormwater will be maintained on-site which will be required to meet Public Works standards, which will be verified through the building/grading permit process.

The Mitigation Monitoring and Reporting Program for the Keyes Community Plan included mitigation measures addressing lighting, air quality, hydrology, hazardous materials, noise, biological resources, agricultural resources, traffic, public facilities, fire and school fees, and geology and soils. All of the mitigation measures applicable to the project, that are not already covered by regulatory programs or permitting, which will be required through the application of development standards have been applied to the project. Those mitigation measures have been incorporated into the Aesthetics, Biological Resources, Hazards and Hazardous Materials, Noise, and Transportation Sections of this initial study.

Review of this project has not indicated any potential for cumulative impacts which might significantly impact the environmental quality of the site and/or the surrounding area.

Mitigation: None.

References: Application materials; Keyes Community Plan, EIR and MMRP adopted April 2000; Initial Study; Stanislaus County General Plan; and Support Documentation¹.

Stanislaus County General Plan; and Support Documentation¹ adopted in August 23, 2016, as amended. **Housing Element** adopted on April 5, 2016.

CENTRAL CALIFORNIA INFORMATION CENTER

California Historical Resources Information System

Department of Anthropology – California State University, Stanislaus

One University Circle, Turlock, California 95382

(209) 667-3307



Alpine, Calaveras, Mariposa, Merced, San Joaquin, Stanislaus & Tuolumne Counties

Date: 2/10/2023

Records Search File #: 12436N

Project: 5024-5030 Rohde Road, Ceres, CA
APN 041-059-001 & 041-059-002; Rezone
application

Biren Patel
3333 Dewar Lane
Turlock, CA 95382
209-485-5166

psakshi1@sbcglobal.net

Dear Mr. Patel

We have conducted a non-confidential extended records search as per your request for the above-referenced project area located on the Ceres USGS 7.5-minute quadrangle map in Stanislaus County.

Search of our files includes review of our maps for the specific project area and the immediate vicinity of the project area, and review of the following:

National Register of Historic Places (NRHP)
California Register of Historical Resources (CRHR)
California Inventory of Historic Resources (1976)
California Historical Landmarks
California Points of Historical Interest listing
Office of Historic Preservation Built Environment Resource Directory (BERD) and the
Archaeological Determinations of Eligibility (ADOE)
Survey of Surveys (1989)
Caltrans State and Local Bridges Inventory
General Land Office Plats
Other pertinent historic data available at the CCaIC for each specific county

The following details the results of the records search:

Prehistoric or historic resources within the project area:

- There are no formally recorded prehistoric or historic archaeological resources, or historic buildings or structures within the project area.
- The General Land Office survey plat for T4S R9E (dated 1854) does not reference any historical features on or near the project in the NW ¼ of the NE ¼ of Section 25.

- The Official Map of the County of Stanislaus (1906) references the road alignment of the subsequent “State Highway” south of the project, and shows a possible landowner in the NE ¼ of Section 25 as S. L. Carter.
- The 1916 edition of the Ceres USGS quadrangle references the “State Highway” alignment south of the project, and several buildings north of the highway that would be 107 years in age (or older).
- The 1953 and 1962 editions of the Ceres USGS quadrangle reference buildings north of the highway alignment (south of the project area) that could be 54 -70 years in age.
- We have no further information on file regarding the possible historical building resources referenced above.

Prehistoric or historic resources within the immediate vicinity of the project area: TID Lateral No. 2 (upper and lower) immediately west and north of the project area has been recorded as P-50-000071 and is referenced as not meeting the criteria for inclusion in the California Register of Historical Resources.

Resources that are known to have value to local cultural groups: None has been formally reported to the Information Center.

Previous investigations within the project area: None has been formally reported to the Information Center.

Recommendations/Comments:

Please be advised that a historical resource is defined as a building, structure, object, prehistoric or historic archaeological site, or district possessing physical evidence of human activities over 45 years old. Since the project area has not been subject to previous investigations, there may be unidentified features involved in your project that are 45 years or older and considered as historical resources requiring further study and evaluation by a qualified professional of the appropriate discipline.

If the current project does not include ground disturbance, further study for archaeological resources is not recommended at this time. If ground disturbance is considered a part of the current project, we recommend further review for the possibility of identifying prehistoric or historic-era archaeological resources.

If the proposed project contains buildings or structures that meet the minimum age requirement (45 years in age or older) it is recommended that the resource/s be assessed by a professional familiar with architecture and history of the county. Review of the available historic

building/structure data has included only those sources listed above and should not be considered comprehensive.

If at any time you might require the services of a qualified professional the Statewide Referral List for Historical Resources Consultants is posted for your use on the internet at <http://chrisinfo.org>

If archaeological resources are encountered during project-related activities, work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources.

If human remains are discovered, California Health and Safety Code Section 7050.5 requires you to protect the discovery and notify the county coroner, who will determine if the find is Native American. If the remains are recognized as Native American, the coroner shall then notify the Native American Heritage Commission (NAHC). California Public Resources Code Section 5097.98 authorizes the NAHC to appoint a Most Likely Descendant (MLD) who will make recommendations for the treatment of the discovery.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the State Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the CHRIS Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

We thank you for contacting this office regarding historical resource preservation. Please let us know when we can be of further service. Thank you for sending the signed **Access Agreement Short Form**.

Note: Billing will be transmitted separately via email from the Financial Services office (\$150.00), payable within 60 days of receipt of the invoice.

If you wish to include payment by Credit Card, you must wait to receive the official invoice from Financial Services so that you can reference the CMP # (Invoice Number), and then contact the link below:

<https://commerce.cashnet.com/ANTHROPOLOGY>

Sincerely,

E. A. Greathouse

E. A. Greathouse, Coordinator
Central California Information Center
California Historical Resources Information System

* Invoice Request sent to: ARBilling@csustan.edu, CSU Stanislaus Financial Services


**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
EIR Mitigation Measures				
4.1 Land Use				
Conversion of additional Prime Farmland to non-agricultural use	4.1-1 Replace Important Farmland at a 1:1 ratio with agricultural land of equal quality and protect the land for agricultural use through long-term land use restrictions, such as agricultural conservation easements.	Developers of new projects in the Community Plan area shall set aside in a long-term conservation or agricultural easement an equal amount of land equivalent to agricultural land proposed for conversion to non-agricultural use. The land shall be of equal quality of that being proposed for development, to the satisfaction of the County.	Planning Department; Agriculture Department	Prior to project approval.
Important Farmland would continue to be converted to non-agricultural uses	4.1-4 Implement Mitigation Measure 4.1-1.	See Mitigation Measure 4.1-1.		

¹ These mitigation measures are taken verbatim from the DEIR, except where revised by the Final EIR. Initial Study mitigation measures incorporated in the DEIR are not included in the Initial Study portion of this Mitigation Monitoring Program.

73
54

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p>(b) The project proponent shall avoid and protect all potential identified VELB habitat where feasible. Where avoidance is infeasible and elderberry shrubs are subject to removal or potential damage from the proposed development, the project proponent shall develop and implement a VELB mitigation plan in accordance with the most current USFWS mitigation guidelines for unavoidable take of VELB habitat, pursuant to either Section 7 or Section 10(a) of the Federal Endangered Species Act. The mitigation plan shall provide for no net loss of VELB habitat and shall include, but might not be limited to, relocation of elderberry shrubs, planting of elderberry shrubs, and monitoring of relocated and planted elderberry shrubs.</p>	<p>If VELB habitat is present, the project proponent shall implement mitigation for the protection of elderberry shrubs, ensuring no net loss of habitat, consistent with USFWS mitigation guidelines.</p>	<p>USFWS</p>	<p>Prior to any construction or grading activity.</p>
<p>Take of Swainson's hawk individuals (eggs, nestlings or juveniles) and other raptors (birds-of-prey).</p>	<p>4.2-3(a)  Prior to approval of development in portions of the Community Plan Area that contain trees, the project proponent, in consultation with the DFG, shall conduct a pre-construction survey of trees in the proposed development area for raptor nests. The surveys shall occur during the raptor breeding-season (approximately March 1 through August 31). The survey shall be conducted by a qualified raptor biologist during the same calendar year that the proposed activity is planned.</p>	<p>The project proponent, in consultation with the DFG, shall conduct a pre-construction survey of trees in any proposed development area for raptor nests. The survey shall be conducted by a qualified raptor biologist during the same calendar year that the proposed activity is planned.</p>	<p>CDFG</p>	<p>In the breeding season prior to any construction or grading activity.</p>

75

56

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p>(b) If an active raptor nest is identified within one half mile of the plan area then a buffer zone shall be implemented within a (0.5 or 0.10) mile radius (depending upon raptor species) of the nest tree or nest burrow, in the case of ground nesting burrowing owls.</p> <p>If an active Swainson's hawk nest is involved then no construction activities shall be initiated during the Swainson's hawk nesting period (IE., March 1 - August 1) within .25 mile without the approval by DFG. Construction shall be permitted at such time that juvenile Swainson's hawks are no longer dependant upon the nest tree.</p>	<p>A buffer zone around nest trees or burrows shall be implemented in consultation with CDFG.</p> <p>There shall be no construction activities initiated during the Swainson's hawk nesting period within .25 miles of an active Swainson's hawk nest without prior approval by CDFG.</p>	<p>CDFG</p> <p>CDFG</p>	<p>Prior to construction or grading activity.</p> <p>During construction or grading activity.</p>
Removal of native oak trees.	<p>4.2-4(a) All oak trees over four inches (dbh) on proposed development sites shall be preserved to the maximum extent practical. Final development plans shall depict all trees proposed for removal. Any trees that are removed shall be replaced at a two to one tree replacement ratio. Prior to issuance of a grading permit, the applicant shall submit a tree preservation plan to the Stanislaus County planning division for review and approval. The tree preservation plan shall include the location, number, species, and size of proposed replacement plantings. In addition, the plan shall include monitoring provisions for watering and landscaping to ensure survival and health of planted oak trees. During the monitoring period, dead trees shall be replaced.</p>	<p>Project proponents shall submit a tree preservation plan to the Stanislaus County planning division for review and approval that ensures that any oak trees over four inches (dbh) that are to be removed shall be replaced at a two to one tree replacement ratio. The plan shall include provisions for watering and landscaping and a monitoring period during which time dead trees shall be replaced</p>	<p>Planning Department; Agriculture Department</p>	<p>Prior to issuance of a grading permit.</p>

76
57

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Cumulative loss and degradation of valley grassland and agricultural habitat supporting native plants and wildlife.	4.2-5 Implement Mitigation Measures 4.2-1 through 4.2-4.	See Mitigation Measures 4.2-1 through 4.2-4.		
4.3 Transportation and Circulation				
Roadway segments in the area could operate at unacceptable levels of service.	4.3-1 (a) Faith Home Road shall be widened to a four-lane major road between Keyes Road and Redwood Road. (b) Keyes Road shall be widened to a four-lane major road from Faith Home Road to State Route 99 southbound on- and off- ramps, and from Golden State Boulevard and State Route 99 northbound on- and off- ramps. (c) Golden State Boulevard shall be widened to a four-lane major road between Keyes Road and Taylor Road. (d) Washington Road shall be widened from a two-lane collector to an access-restricted two-lane, 60-foot wide collector south of the TID canal to Keyes Road at such time that widening is justified, as determined by the Director of Public Works.	The County shall establish a funding mechanism for required roadway improvements identified in the Community Plan. Individual projects within the Community Plan Area shall pay their fair share for roadway improvements based upon a project-specific traffic study. The County shall construct individual roadway projects.	Public Works Department and Board of Supervisors Developer Public Works Department	Prior to first approval of new development in the Plan Area. Prior to project approval. As warranted.

7758

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Circulation in the Community Plan Area and the surrounding roadways.	<p>4.3-2 (a) Faith Home Road shall be widened to six lanes between Keyes Road and Redwood Road.</p> <p>(b) Keyes Road shall be widened to six through lanes from Faith Home Road to Golden State Boulevard.</p> <p>(c) Washington Road shall be widened to an access-restricted, two-lane, 60-foot wide collector south of the TID canal to Keyes Road, at such time that widening is justified, as determined by the Director of Public Works.</p>	<p>The County shall establish a funding mechanism for required roadway improvements identified in the Community Plan.</p> <p>Individual projects within the Community Plan Area shall pay their fair share for roadway improvements based upon a project-specific traffic study.</p> <p>The County shall construct individual roadway projects.</p>	<p>Public Works Department and Board of Supervisors</p> <p>Developer</p> <p>Public Works Department</p>	<p>Prior to first approval of new development in the Plan Area.</p> <p>Prior to project approval</p> <p>As warranted.</p>
Reduced levels of service at area intersections to unacceptable levels	<p>4.3-3 (a) Keyes Road / SR 99 NB and SB Ramps</p> <p>Keyes Road shall be widened to six lanes from Faith Home Road to Golden State Boulevard. When a need for signalization is demonstrated through traffic signal warrants analysis, traffic signals shall be provided at the two ramp intersections. In addition to signalization, the following measures are necessary to operate the intersections at LOS C conditions or better during the PM peak hour:</p>	<p>The County shall establish a funding mechanism for required roadway improvements identified in the Community Plan.</p> <p>Individual projects within the Community Plan Area shall pay their fair share for roadway improvements based upon a project-specific traffic study.</p> <p>The County shall construct individual roadway projects.</p>	<p>Public Works Department and Board of Supervisors</p> <p>Developer</p> <p>Public Works Department</p>	<p>Prior to first approval of new development in the Plan Area.</p> <p>Prior to project approval.</p> <p>As warranted.</p>

78
59

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p><u>SB Ramps</u> Provide dual left-turn lanes and a separate right-turn lane on the southbound approach.</p> <p>Provide dual westbound left-turn lanes on Keyes Road to southbound SR99.</p> <p>Provide three eastbound and three westbound through lanes.</p> <p>Provide a free eastbound right-turn lane from Keyes Road to southbound SR99.</p> <p><u>NB Ramps</u> Provide dual left-turn lanes and a separate right-turn lane on the northbound approach.</p> <p>Provide an eastbound left-turn lane from Keyes Road to northbound SR99.</p> <p>Provide three eastbound and three westbound through lanes.</p> <p>Provide a free westbound right-turn lane from Keyes Road to northbound SR99.</p>			

79
60

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p>(b) Keyes Road / Golden State Boulevard Provide single westbound and dual eastbound left-turn lanes.</p> <p>Provide separate eastbound and westbound right-turn lanes.</p> <p>Provide two northbound and two southbound through lanes.</p> <p>Provide a separate right-turn lane on the northbound approach.</p> <p>Provide a separate southbound left-turn lane.</p> <p>Provide a free southbound right-turn lane.</p>			
4.4 Air Quality				
<p>Generation of CO, PM₁₀, NO_x and ROG emissions could exceed SJVUAPCD thresholds.</p>	<p>4.4-1(a) (Initial Study Mitigation Measure 7)</p> <p>To reduce PM₁₀ emissions associated with construction the following strategies shall be included as part in all construction contracts for future development.</p> <ol style="list-style-type: none"> All clearing, grading, earth moving, or excavation activities shall cease when wind speeds are consistently equal to or greater than 20 mph. 	<p>The San Joaquin Valley Air Pollution Control District (SJVAPCD) shall confirm that all construction contracts in the Community Plan include emissions reduction strategies included in Mitigation Measure 4.4-1.</p>	<p>SJVAPCD</p>	<p>Prior to issuance of grading or building permits.</p> <p>Ongoing during construction.</p>

80
61

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p>2. All excavated material, graded or otherwise disturbed shall be watered sufficiently to prevent excessive amounts of dust. Watering shall occur twice daily with complete coverage, preferably in late morning and after work is done for the day.</p> <p>3. All material transported and vehicle speeds shall be limited to 15 mph on unpaved roadways.</p> <p>4. Street sweeping and/or washing shall be undertaken to reduce dust emissions on paved roads, shoulders and access ways adjacent to the construction site. Wetting of the pavement shall occur either prior to or in conjunction with rotary sweeping.</p> <p>5. All internal combustion equipment shall be properly maintained and tuned according to manufacturer's specifications.</p> <p>6. Idling of all internal combustion equipment shall be limited to ten minutes at any given time.</p> <p>7. The use of building materials that do not require the use of paints/solvents shall be encouraged.</p> <p>(b) All diesel-fueled construction equipment shall implement the following measures:</p> <p>(i) Retard injection timing 2 degrees.</p>			

81
62

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<ul style="list-style-type: none"> (ii) Install high pressure injectors. (iii) Use reformulated diesel fuel. (iv) Limit diesel warm-up times (normally, a properly tuned diesel engine can be warmed up in 5 to 10 minutes). 			
<p>ROG, NO_x, CO, and PM₁₀ emissions generated by motor vehicles and on-site sources associated with project operation would exceed established thresholds.</p>	<p>4.4-2(a) (Initial Study Mitigation Measure 8)</p> <p>To ensure the SJVAPCD standards are achieved, all new development within the plan area shall implement the following measures:</p> <ul style="list-style-type: none"> 1. Lighting controls and energy-efficient lighting in buildings. 2. Light colored roof materials to reflect heat. 3. Provide low nitrogen oxide (NO_x) emitting and/or high efficiency water heaters. 4. If fireplaces are proposed, natural gas fireplaces or EPA-certified wood burning fireplaces/stoves should be installed in every unit that has a fireplace. 5. Include exterior electrical outlets on all residential units to encourage the use of electric powered yard maintenance equipment.. 	<p>The County and SJVAPCD shall require that all new development in the Community Plan includes design measures, included in Mitigation Measure 4.4-2(a) and (c), to reduce project emissions.</p>	<p>Planning Department; SJVAPCD</p>	<p>Prior to project approval.</p>

08
63

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
	<p>(b) (Initial Study Mitigation Measure 9)</p> <p>All new development shall prepare an analysis to determine if project emissions would exceed SJVAPCD standards. If the project is found to exceed these standards, mitigation shall be incorporated into the project to reduce the emissions to a level below District standards. If no mitigation is available to reduce emissions below the standards, the project applicant shall participate in the District's offset program, by purchasing new equipment or other measures that would reduce emissions in the district by an amount equivalent to the amount of project emissions in excess of District standards.</p> <p>(c) Increase insulation beyond Title 24 requirements.</p>	<p>All new development in the Community Plan shall prepare a project-specific air quality analysis. If development would exceed SJVAPCD standards after implementation of the measures in Mitigation Measure 4.4-2(a), the project applicant shall participate in the District's offset program, as described in Mitigation Measure 4.4-2(b).</p> <p>See Mitigation Measure 4.4-2(a).</p>	<p>Developer; SJVAPCD</p>	<p>Prior to project approval.</p>
<p>Ozone in the air basin.</p>	<p>4.4-3 Implement Mitigation Measures 4.4-1(a) and (b) and 4.4-2(a), (b), and (c).</p>	<p>See Mitigation Measures 4.4-1(a) and (b) and 4.4-2(a), (b), and (c).</p>		
FIS Mitigation Measures				
<p>Unstable soils</p>	<p>1 Design guidelines for individual projects shall include requirements for the preparation of site-specific geotechnical reports and shall require that project design incorporates additional or special construction technique and/or features, if any, to account for potentially unstable soil conditions.</p>	<p>The developer for any new project in the Community Plan shall prepare site-specific geotechnical reports and shall demonstrate that the project design incorporates techniques or features to account for potentially unstable soil conditions.</p>	<p>Public Works; Building Department; Department of Environmental Resources</p>	<p>Prior to issuance of grading permit.</p>

83
64

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Soils are capable of supporting septic systems or will require connection to the Keyes CSD lines.	2. If the use of septic tanks is proposed for new development, a study shall be conducted by a qualified hydrologist to determine if the soil is capable of supporting a septic system. If the study determines that the soil is inadequate, the development shall be required to be annexed into the Keyes Community Service District for the provision of wastewater services.	The developer for any new project in the Community Plan shall conduct a study to determine if the soil is capable of supporting a septic system. If the soil is inadequate, the development shall be required to be annexed into the Keyes Community Service District.	Building Department; Department of Environmental Resources	Prior to project approval.
Adequate water would be available to serve future development prior to the approval of any development projects.	3. New development shall not be approved until it has demonstrated that adequate water supplies exist to serve the project.	The developer for any new project in the Community Plan shall provide to the City "will serve" letters from the appropriate water purveyor.	Department of Environmental Resources	Prior to project approval.
Discharge into surface waters.	4. During project construction, all new development shall implement appropriate stormwater runoff BMPs and design features to protect receiving water quality during construction and occupancy, consistent with Stanislaus County standards.	The developer of any new project in the Community Plan area shall incorporate design features to protect receiving water quality during construction and occupancy of the project. The contractor shall implement appropriate stormwater runoff BMPs during construction. The County shall inspect the project site to verify that stormwater runoff measures are being implemented	Public Works	During project construction.
Discharge into surface waters.	5. BMPs shall be incorporated into project design to reduce urban contaminant levels in stormwater runoff, consistent with Stanislaus County standards.	The developer of any new project in the Community Plan area shall incorporate BMPs into project design to reduce urban contaminant levels in stormwater runoff.	Public Works; Department of Environmental Resources	Prior to issuance of building permit.

84
67

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Change of absorption rates, drainage patterns and the rate and amount of surface runoff.	6. All new projects within the plan area shall demonstrate through a drainage study or hydrological report, in accordance with the Stanislaus County Public Works standards, that new development would not increase peak storm flows and that adequate capacity exists downstream to accommodate increased flood volume.	The developer of any new project in the Community Plan area shall prepare a drainage study or hydrological report, to demonstrate that new development would not increase peak storm flows and that adequate capacity exists downstream to accommodate increased flood volume.	Public Works; Department of Environmental Resources	Prior to project approval.
Odor	10. To address potential land use incompatibilities related to odor, new residential areas shall not be located immediately adjacent to odor producing land uses. If this is infeasible, adequate setbacks shall be provided as part of the project.	The County shall review new residential development to determine potential odor incompatibilities. If such potential exists, the County shall require adequate setbacks at the residential property to reduce odor impacts to acceptable levels.	Department of Environmental Resources; SJVAPCD	Prior to project approval.
Potential hazardous materials	11. Prior to development at locations suspected or known to have used hazardous materials, a Phase 1 Environmental Site Assessment shall be prepared in accordance with ASTM Standard to identify whether past or existing uses of the site have adversely affected soil or groundwater, or would otherwise pose a health hazard during site development. Results of the Phase 1 investigation shall be used to determine whether additional investigation or site management is needed.	A Phase 1 Environmental Site Assessment shall be prepared by the developer of any new project in the Community Plan area prior to development at locations suspected or known to have used hazardous materials. Based on results of the Phase 1 investigation, additional investigation or site management shall be required.	Planning Department; Department of Environmental Resources	Prior to grading or construction activities.
Potential hazardous materials	12. Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.	The developer of any new project in the Community Plan area shall include in all construction contracts a stop-work provision in the event unidentified contamination is discovered during construction.	Planning Department; Department of Environmental Resources	Prior to construction.

85
66

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Increase in noise levels.	13. New residential development located within areas subject to noise levels in excess of 60 L _{dn} shall demonstrate through an acoustical study that project design would reduce noise impacts to acceptable levels (per the County General Plan). Measures to reduce noise could include, sound-rated windows, sound walls, barriers, increased setbacks or other modifications to project design, or noise attenuation of proposed or existing buildings.	An acoustical study shall be prepared by the developer of any new project in the Community Plan area which demonstrates that project design would reduce noise impacts to acceptable levels in areas of new residential development subject to noise levels in excess of 60 L _{dn} .	Planning Department; Department of Environmental Resources	Prior to project approval.
Increase in noise levels.	14. New development shall implement the following measures during construction: a. Construction shall be allowed only during the day, during hours designated by the County. b. All construction equipment shall be fitted with properly functioning mufflers. c. Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors.	All construction contracts shall include the measures identified in Mitigation Measure 14. The County shall inspect the project site to verify that noise reduction measures are implemented.	Planning Department Building Department	Prior to issuance of grading and construction permits. During construction.
Fire protection	15. All new development in the Community Plan Area shall be required to pay all applicable program fees, as defined by the Keyes Fire Protection District, which shall be used to prevent fire protection service from dropping below its current level. Fees may be used towards the purchase of new or replacement vehicles or substation space.	All new development in the Community Plan Area shall pay all applicable program fees, as defined by the Keyes Fire Protection District.	Planning Department; Keyes Fire Protection District	Prior to project approval.

86

67

**MITIGATION MONITORING PLAN
KEYES COMMUNITY PLAN UPDATE**

Significant or Potentially Significant Impact	Mitigation Measure	Implementation, Monitoring and Reporting Actions	Monitoring and Reporting Responsibilities	Implementation, Monitoring and Reporting Schedule
Light and glare	16. New multistory development in Highway Commercial, Industrial and Planned Industrial areas shall minimize the use of reflective surfaces and have those reflective surfaces which are used to be oriented in such a manner to reduce glare impacts along roadways.	The County shall review new multistory development in Highway Commercial, Industrial, and Planned Industrial areas to ensure that reflective surfaces would not result in glare along roadways.	Planning Department	Prior to project approval.
Light and glare	17. In Highway Commercial areas, cut-off luminaries, and/or shield, low-intensity lights shall be used to minimize the visibility of the lighting from nearby areas, and to prevent "spill over" of light onto adjacent residential properties.	New development in Highway Commercial areas shall include cut-off luminaries, and/or shield, low-intensity lights to prevent spillover.	Planning Department	Prior to project approval.
Park facilities	18. New development shall be required to contribute its fair share, as determined by the County of Stanislaus, toward provision of the parks proposed by this plan.	The developer of any new project in the Community Plan area shall to contribute its fair share toward provision of the parks proposed by the Community Plan.	Planning Department; Parks Department	Prior to project approval.

87

68

Stanislaus County

Planning and Community Development

1010 10th Street, Suite 3400
Modesto, CA 95354

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

Mitigation Monitoring and Reporting Program

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

December 15, 2023 (Amended February 2, 2024)

(Additional text is shown in bold and underline and deleted text in ~~strikeout~~.)

1. Project title and location: General Plan Amendment and Rezone Application No. PLN2023-0031 – Secured Space South Storage

5024, 5028, and 5030 Rohde Road, between Esmar and Faith Home Roads, in the community of Keyes. (APN: 041-059-001 & 041-059-002).
2. Project Applicant name and address: Sakshi Enterprise, LLC, Biren Patel
2801 Mitchell Road, #3074, Ceres, CA 95307
3. Person Responsible for Implementing Mitigation Program (Applicant): Sakshi Enterprise, LLC, Biren Patel
4. Contact person at County: Kristin Doud, Deputy Director of Planning
(209) 525-6330

MITIGATION MONITORING AND REPORTING PROGRAM:

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

I. AESTHETICS

- No. 1 Mitigation Measure: New multistory development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.

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

- No. 2 Mitigation Measure: New development shall include cut-off luminaries and/or shields. All exterior lighting shall be designed (aimed down and towards the site) to provide adequate illumination without a glare effect. Low intensity lights

shall be used to minimize the visibility of the lighting from nearby areas, and to prevent "spill over" of light onto adjacent residential properties.

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

IV. BIOLOGICAL RESOURCES

No. 3 Mitigation Measure: Pre-construction surveys for Valley Elderberry Longhorn Beetle (VELB) on the site shall be conducted by a qualified biologist, in accordance with any applicable United States Fish and Wildlife protocols. Prior to the removal of any elderberry shrubs, the applicant shall obtain concurrence from US Fish and Wildlife Service regarding removing the shrubs. Prior to securing concurrence to remove the blue elderberry shrubs, the shrubs shall be protected with a no-disturbance buffer extending 10 feet from the driplines of the shrubs. Construction in the vicinity of the blue elderberry shrubs should occur between June 15 and April 15. During this time period, VELB (if present) would be within the interior portion of the stems of the shrubs and would not move (i.e., fly or walk) into the construction area.

Who Implements the Measure:	Applicant/Developer.
When should the measure be implemented:	Prior to removal of any blue elderberry shrubs.
When should it be completed:	After United States Fish and Wildlife (USFW) approval of a plan to remove any blue elderberry shrubs.
Who verifies compliance:	Stanislaus County Planning and Community Development Department, in consultation with USFW and a qualified biologist.
Other Responsible Agencies:	California Department of Fish and Wildlife (CDFW); Stanislaus County Planning and Community Development Department.

No. 4 Mitigation Measure: If ground disturbing activity or construction commences between March 1 and September 15, pre-construction surveys for nesting Swainson's hawks (SWHA) shall be conducted by a qualified biologist. SWHA surveys shall be conducted a maximum of 10 days prior to the onset of grading or construction activities, within 0.5 miles of the project site area, in accordance with protocol developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC, 2000). If active nests are found, a qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the need (if any) for temporal restrictions on construction, including but not limited to a minimum no-disturbance

buffer of 0.5 miles to be maintained around active nests prior to and during any ground-disturbing activities until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If take cannot be avoided, take authorization through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. The determination shall utilize criteria set forth by CDFW (CDFG, 1994).

- | | |
|---|--|
| Who Implements the Measure: | Applicant/Developer. |
| When should the measure be implemented: | Prior to any commencement of any ground disturbing activity (i.e., grading, grubbing, or construction) between March 1 and September 1 of the year. |
| When should it be completed: | As determined by a qualified biologist when construction activities take place between March 1 and September 1 during the year. |
| Who verifies compliance: | Stanislaus County Planning and Community Development Department, in consultation with California Department of Fish and Wildlife (CDFW) and a qualified biologist. |
| Other Responsible Agencies: | Stanislaus County Planning and Community Development Department. |
- No. 5 Mitigation Measure: If construction commences between February 1 and August 31, pre-construction surveys for burrowing owls on the site shall be conducted. If occupied burrows are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. The determinations shall be pursuant to criteria set forth by CDFW (CDFG, 2012).
- | | |
|---|--|
| Who Implements the Measure: | Applicant/Developer. |
| When should the measure be implemented: | Prior to any commencement of any ground disturbing activity (i.e., grading, grubbing, or construction) between February 1 and August 31 of the year. |
| When should it be completed: | As determined by a qualified biologist when construction activities take place between February 1 and August 31 of the year. |
| Who verifies compliance: | Stanislaus County Planning and Community Development Department, in consultation with California Department of Fish and Wildlife (CDFW) and a qualified biologist. |
| Other Responsible Agencies: | Stanislaus County Planning and Community Development Department. |
- No. 6 Mitigation Measure: Trees, shrubs, and grasslands in the site could be used by other birds protected by the Migratory Bird Treaty Act of 1918. If vegetation removal or

construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for nesting birds shall be completed. If active nests are found, work in the vicinity of the nest shall be delayed until the young fledge.

Who Implements the Measure:	Applicant/Developer.
When should the measure be implemented:	Prior to any commencement of any ground disturbing activity (i.e., grading, grubbing, or construction) between March 1 and July 31 of the year.
When should it be completed:	As determined by a qualified biologist when construction activities take place between March 1 and July 31 of the year.
Who verifies compliance:	Stanislaus County Planning and Community Development Department, in consultation with California Department of Fish and Wildlife (CDFW) and a qualified biologist.
Other Responsible Agencies:	Stanislaus County Planning and Community Development Department.

- No. 7 Mitigation Measure: All oak trees over four inches in diameter shall be preserved to the maximum extent practical. Final development plans shall depict all oak trees proposed for removal. If oak trees four inches in diameter or more exist on the project site, the applicant shall submit a tree preservation plan to the Stanislaus County Planning Division for review and approval. The tree preservation plan shall include the following:
- Any removed oak trees shall be replaced at a two-to-one tree replacement ratio.
 - The tree preservation plan shall include the location, number, species, and size of proposed replacement plantings.
 - The tree preservation plan shall include monitoring provisions for watering and landscaping to ensure survival and health of planted oak trees.
 - Replacement trees shall be monitored for a period no less than 5 years after replacement trees have been planted; Dead or dying trees shall be replaced.

Who Implements the Measure:	Applicant/Developer.
When should the measure be implemented:	Prior to any commencement of any ground disturbing activity (i.e., grading, grubbing, or construction).
When should it be completed:	Prior to any commencement of any ground disturbing activity (i.e., grading, grubbing, or construction).

Who verifies compliance: Stanislaus County Planning and Community Development Department, in consultation with California Department of Fish and Wildlife (CDFW) and a qualified biologist.

Other Responsible Agencies: Stanislaus County Planning and Community Development Department.

IX. HAZARDS AND HAZARDOUS MATERIALS

No. 8 Mitigation Measure: Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.

Who Implements the Measure: Applicant/Developer.

When should the measure be implemented: Prior to grading and construction activity.

When should it be completed: When grading and construction activities are completed.

Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.

Other Responsible Agencies: Stanislaus County Department of Environmental Resources, Hazardous Materials Division **and California Department of Toxic Substance Control**.

XIII. NOISE

No. 9 Mitigation Measure: Hours of construction on the project site shall be limited to 7:00 a.m. to 6:00 p.m. Monday thru Friday, with no construction allowed on holidays.

Who Implements the Measure: Applicant/Developer.

When should the measure be implemented: During grading and construction activity.

When should it be completed: When grading and construction activities are completed.

Who verifies compliance: Stanislaus County Planning and Community Development Department, Planning Division.

Other Responsible Agencies: None.

No. 10 Mitigation Measure: Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors. All construction equipment shall be fitted with properly functioning mufflers.

Who Implements the Measure: Applicant/Developer.

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

XVII. TRANSPORTATION

No. 11 Mitigation Measure: Prior to issuance of a building permit, the applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for the proposed land uses per the Keyes Community Plan fee program adopted at the time of building permit issuance. These fees are adjusted for inflation using the Engineering News-Record construction cost index and shall be paid prior to building permit issuance.

Who Implements the Measure:	Applicant/Developer.
When should the measure be implemented:	Prior to issuance of a building permit for each specified use.
When should it be completed:	Prior to issuance of a building permit for each specified use.
Who verifies compliance:	Stanislaus County Public Works Department.
Other Responsible Agencies:	Stanislaus County Planning and Community Development Department.

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

Signature on File	2/2/2024
Person Responsible for Implementing MMRP	Date

(I:\PLANNING\STAFF REPORTS\GPA\2023\GPA REZ PLN2023-0031 - SECURED SPACE SOUTH STORAGE\CEQA-30-DAY-REFERRAL\MITIGATION MONITORING REPORTING PROGRAM.DOC)



MITIGATED NEGATIVE DECLARATION

NAME OF PROJECT: General Plan Amendment and Rezone Application No. PLN2023-0031 - Secured Space Self Storage

LOCATION OF PROJECT: 5024, 5028, and 5030 Rohde Road, between Esmar and Faith Home Roads, in the community of Keys

PROJECT DEVELOPER: Sakshi Enterprise, LLC., Biren Patel

DESCRIPTION OF PROJECT: This is a request to amend the Community Plan designation from Medium-Density Residential to Commercial and the zoning designation from General Agriculture (A-2-10) to Planned Development (P-D) to allow for the operation of an existing mini-storage facility on a 4.67± acre parcel.

Based upon the Amended Initial Study, dated **December 15, 2023, as amended on February 2, 2024**, the Environmental Coordinator finds as follows:

1. This project does not have the potential to degrade the quality of the environment, nor to curtail the diversity of the environment.
2. This project will not have a detrimental effect upon either short-term or long-term environmental goals.
3. This project will not have impacts which are individually limited but cumulatively considerable.
4. This project will not have environmental impacts which will cause substantial adverse effects upon human beings, either directly or indirectly.

The aforementioned findings are contingent upon the following mitigation measures (if indicated) which shall be incorporated into this project:

1. New multistory development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.
2. New development shall include cut-off luminaries and/or shields. All exterior lighting shall be designed (aimed down and towards the site) to provide adequate illumination without a glare effect. Low intensity lights shall be used to minimize the visibility of the lighting from nearby areas, and to prevent "spill over" of light onto adjacent residential properties.
3. Pre-construction surveys for Valley Elderberry Longhorn Beetle (VELB) on the site shall be conducted by a qualified biologist, in accordance with any applicable United States Fish and Wildlife protocols. Prior to the removal of any elderberry shrubs, the applicant shall obtain concurrence from US Fish and Wildlife Service regarding removing the shrubs. Prior to securing concurrence to remove the blue elderberry shrubs, the shrubs shall be protected with a no-disturbance buffer extending 10 feet from the driplines of the shrubs. Construction in the vicinity of the blue elderberry shrubs should occur between June 15 and April 15. During this time period, VELB (if present) would be within the interior portion of the stems of the shrubs and would not move (i.e., fly or walk) into the construction area.

4. If ground disturbing activity or construction commences between March 1 and September 15, pre-construction surveys for nesting Swainson's hawks (SWHA) shall be conducted by a qualified biologist. SWHA surveys shall be conducted a maximum of 10 days prior to the onset of grading or construction activities, within 0.5 miles of the project site area, in accordance with protocol developed by the Swainson's Hawk Technical Advisory Committee (SWHA TAC, 2000). If active nests are found, a qualified biologist, in consultation with the California Department of Fish and Wildlife (CDFW), shall determine the need (if any) for temporal restrictions on construction, including but not limited to a minimum no-disturbance buffer of 0.5 miles to be maintained around active nests prior to and during any ground-disturbing activities until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival. If take cannot be avoided, take authorization through the issuance of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA. The determination shall utilize criteria set forth by CDFW (CDFG, 1994).
5. If construction commences between February 1 and August 31, pre-construction surveys for burrowing owls on the site shall be conducted. If occupied burrows are found, a qualified biologist should determine the need (if any) for temporal restrictions on construction. The determinations shall be pursuant to criteria set forth by CDFW (CDFG, 2012).
6. Trees, shrubs, and grasslands in the site could be used by other birds protected by the Migratory Bird Treaty Act of 1918. If vegetation removal or construction commences during the general avian nesting season (March 1 through July 31), a pre-construction survey for nesting birds shall be completed. If active nests are found, work in the vicinity of the nest shall be delayed until the young fledge.
7. All oak trees over four inches in diameter shall be preserved to the maximum extent practical. Final development plans shall depict all oak trees proposed for removal. If oak trees four inches in diameter or more exist on the project site, the applicant shall submit a tree preservation plan to the Stanislaus County Planning Division for review and approval. The tree preservation plan shall include the following:
 - Any removed oak trees shall be replaced at a two-to-one tree replacement ratio.
 - The tree preservation plan shall include the location, number, species, and size of proposed replacement plantings.
 - The tree preservation plan shall include monitoring provisions for watering and landscaping to ensure survival and health of planted oak trees.
 - Replacement trees shall be monitored for a period no less than 5 years after replacement trees have been planted; Dead or dying trees shall be replaced.
8. Construction contracts shall include a stop-work provision in the event previously unidentified contamination is discovered during construction so that appropriate actions can be taken to reduce potential human health and environmental hazards.
9. Hours of construction on the project site shall be limited to 7:00 a.m. to 6:00 p.m. Monday thru Friday, with no construction allowed on holidays.
10. Any noisy construction equipment shall be located away from sensitive receptors, and, if necessary, temporary noise barriers shall be constructed between noise sources and sensitive receptors. All construction equipment shall be fitted with properly functioning mufflers.



11. Prior to issuance of a building permit, the applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for the proposed land uses per the Keyes Community Plan fee program adopted at the time of building permit issuance. These fees are adjusted for inflation using the Engineering News-Record construction cost index and shall be paid prior to building permit issuance.

The Amended Initial Study and other environmental documents are available for public review at the Department of Planning and Community Development, 1010 10th Street, Suite 3400, Modesto, California.

Initial Study prepared by: Kristy Doud, Deputy Director

Submit comments to: Stanislaus County
Planning and Community Development Department
1010 10th Street, Suite 3400
Modesto, California 95354

SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS

PROJECT: GPA & REZ APPLICATION NO. PLN2023-0031- SECURED SPACE SELF STORAGE

REFERRED TO:				RESPONDED		RESPONSE			MITIGATION MEASURES		CONDITIONS	
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
CA DEPT OF FISH & WILDLIFE	X	X	X		X							
CA DEPT OF TRANSPORTATION DIST 10	X	X	X		X							
CA OPR STATE CLEARINGHOUSE	X	X	X		X			X		X		X
CA RWQCB CENTRAL VALLEY REGION	X	X	X	X				X		X	X	
SCHOOL DISTRICT 1: TURLOCK UNIFIED	X	X	X		X							
COMMUNITY SERVICE DIST: KEYES	X	X	X	X				X		X	X	
COOPERATIVE EXTENSION	X	X	X		X							
FIRE PROTECTION DIST: KEYES	X	X	X		X							
RAILROAD: UNION PACIFIC	X	X	X		X							
IRRIGATION DISTRICT: TURLOCK	X	X	X	X				X		X	X	
MOSQUITO DISTRICT: TURLOCK	X	X	X		X							
STAN COUNTY EMERGENCY MEDICAL SERVICES	X	X	X		X							
MUNICIPAL ADVISORY COUNCIL: KEYES	X	X	X	X				X		X		X
PACIFIC GAS & ELECTRIC	X	X	X		X							
POSTMASTER: KEYES	X	X	X		X							
CITY OF TURLOCK	X	X	X	X				X		X		X
SAN JOAQUIN VALLEY APCD	X	X	X		X							
SCHOOL DISTRICT 1: KEYES UNION	X	X	X		X							
STAN CO BUILDING PERMITS DIVISION	X	X	X		X			X		X	X	
STAN CO CEO	X	X	X		X							
STAN CO DER	X	X	X	X				X		X	X	
CA DEPT OF TOXIC SUBSTANCE CONTROL				X				X		X	X	
STAN CO HAZARDOUS MATERIALS	X	X	X	X				X	X			X
STAN CO PARKS & RECREATION	X	X	X		X							
STAN CO PUBLIC WORKS	X	X	X	X				X	X		X	
STAN CO SHERIFF	X	X	X		X							
STAN CO SUPERVISOR DIST 5: C. CONDIT	X	X	X		X							
STAN COUNTY COUNSEL	X	X	X		X							
STANISLAUS FIRE PREVENTION BUREAU	X	X	X		X							
STANISLAUS LAFCO	X	X	X	X				X		X	X	
SURROUNDING LAND OWNERS		X	X	X				X		X		X
TELEPHONE COMPANY: ATT	X	X	X		X							
TRIBAL CONTACTS (CA Government Code §65352.3)	X	X	X		X							

**COUNTY OF STANISLAUS CAMPAIGN CONTRIBUTION DISCLOSURE FORM
PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT**

Application Number: PLN2023-0031
 Application Title: OWNER
 Application Address: 2801 MITCHELL ROAD #3074, CERES, CA 95307
 Application APN: 041-059-001 & 041-059-002

Was a campaign contribution, regardless of the dollar amount, made to any member of a decision-making body involved in making a determination regarding the above application (i.e. Stanislaus County Board of Supervisors, Planning Commission, Airport Land Use Commission, or Building Code Appeals Board), hereinafter referred to as Member, during the 12-month period preceding the filing of the application, by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist?

Yes No

If no, please sign and date below.

If yes, please provide the following information:

Applicant's Name: _____

Contributor or Contributor Firm's Name: _____

Contributor or Contributor Firm's Address: _____

Is the Contributor:

The Applicant	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The Property Owner	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The Subcontractor	Yes <input type="checkbox"/>	No <input type="checkbox"/>
The Applicant's Agent/ Lobbyist	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Note: Under California law as implemented by the Fair Political Practices Commission, campaign contributions made by the Applicant and the Applicant's agent/lobbyist who is representing the Applicant in this application or solicitation must be aggregated together to determine the total campaign contribution made by the Applicant.

Identify the Member(s) to whom you, the property owner, your subcontractors, and/or agent/lobbyist made campaign contributions during the 12-month period preceding the filing of the application, the name of the contributor, the dates of contribution(s) and dollar amount of the contribution. Each date must include the exact month, day, and year of the contribution.

Name of Member: _____

Name of Contributor: _____

Date(s) of Contribution(s): _____

Amount(s): _____

(Please add an additional sheet(s) to identify additional Member(s) to whom you, the property owner, your subconsultants, and/or agent/lobbyist made campaign contributions)

By signing below, I certify that the statements made herein are true and correct. I also agree to disclose to the County any future contributions made to Member(s) by the applicant, property owner, or, if applicable, any of the applicant's proposed subcontractors or the applicant's agent or lobbyist after the date of signing this disclosure form, and within 12 months following the approval, renewal, or extension of the requested license, permit, or entitlement to use.

02/07/2024

 Date



 Signature of Applicant

SAKSHI ENTERPRISE LLC

 Print Firm Name if applicable

BIREN PATEL

 Print Name of Applicant

GPA REZ PLN2023-0031

SECURED SPACE SELF STORAGE

**Planning Commission
February 15, 2024**



Overview

- General Plan Amendment and Rezone
 - Request to amend the Community Plan designation from Medium-Density Residential to Commercial
 - Request to amend zoning designation from General Agriculture (A-2-10) to Planned Development
 - To allow operation of an existing mini-storage facility

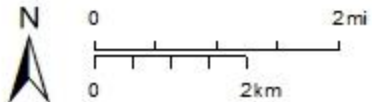
SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

AREA MAP

LEGEND

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



Source: Planning Department GIS

Date: 4/19/2023



SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

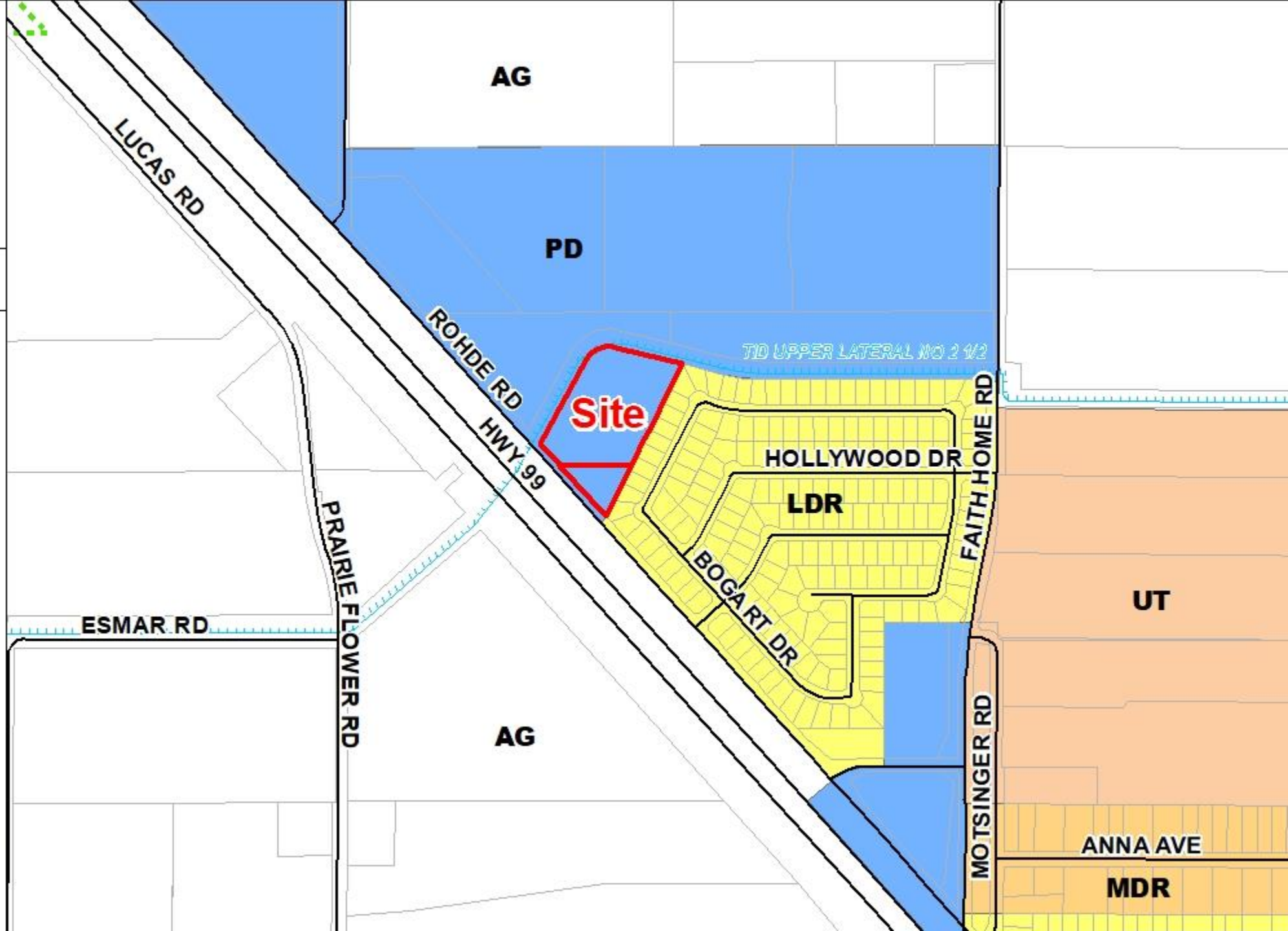
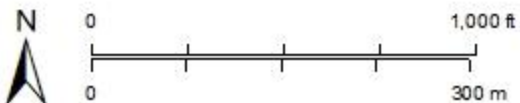
GENERAL PLAN MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Parcel
-  Road
-  Canal

General Plan

-  Agriculture
-  Low Density Residential
-  Medium Density Residential
-  Urban Transition
-  Planned Development










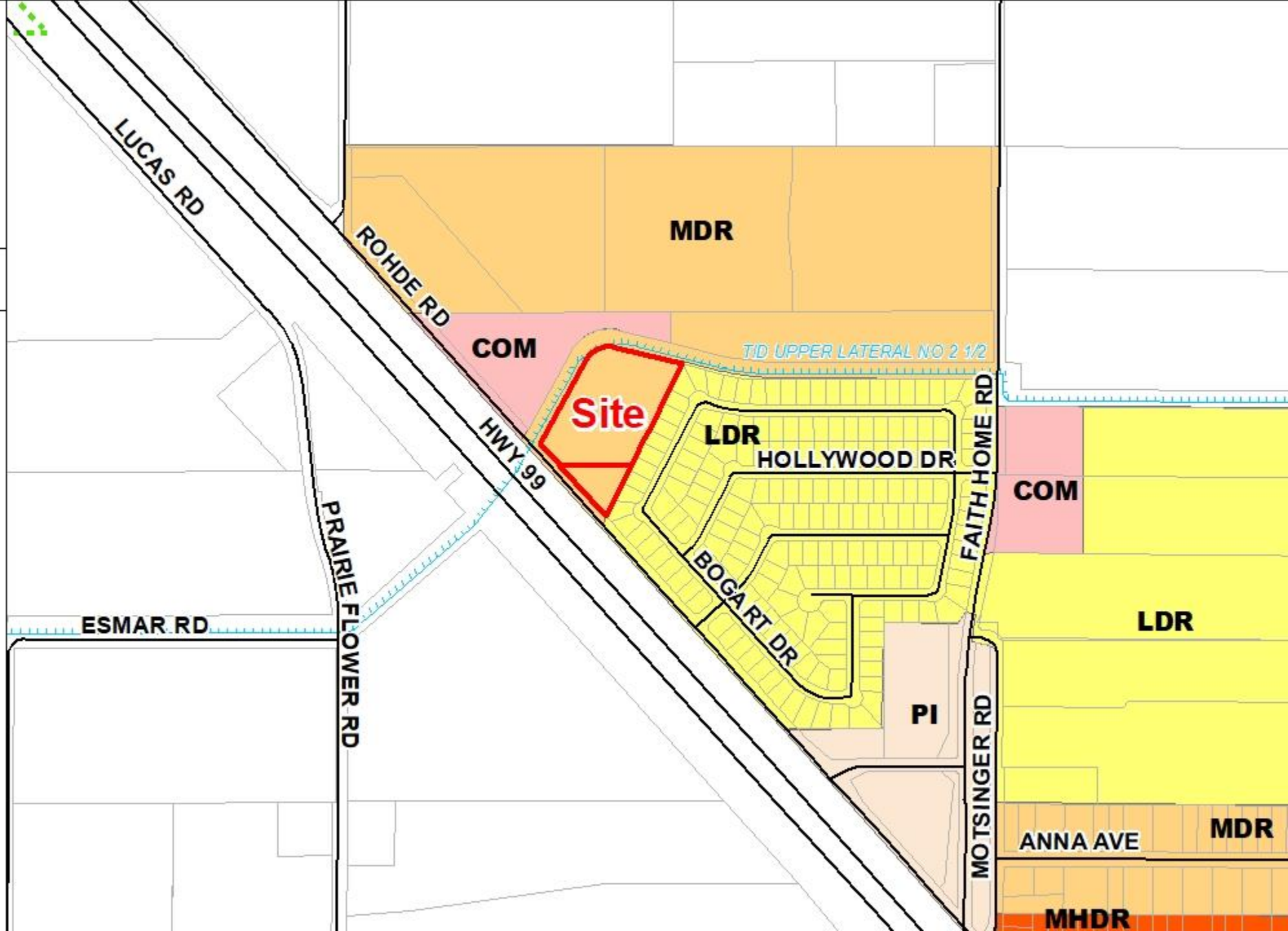
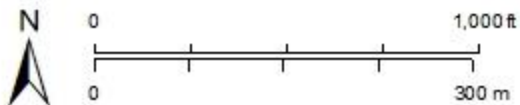
SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

COMMUNITY PLAN MAP

Community Plan Land Use Designations

-  Residential - Medium
-  Residential - Low
-  Residential - Medium-High
-  Commercial
-  Planned Industrial
-  Sphere of Influence
-  Road



SECURED SPACE SOUTH STORAGE







GPA REZ PLN2023-0031

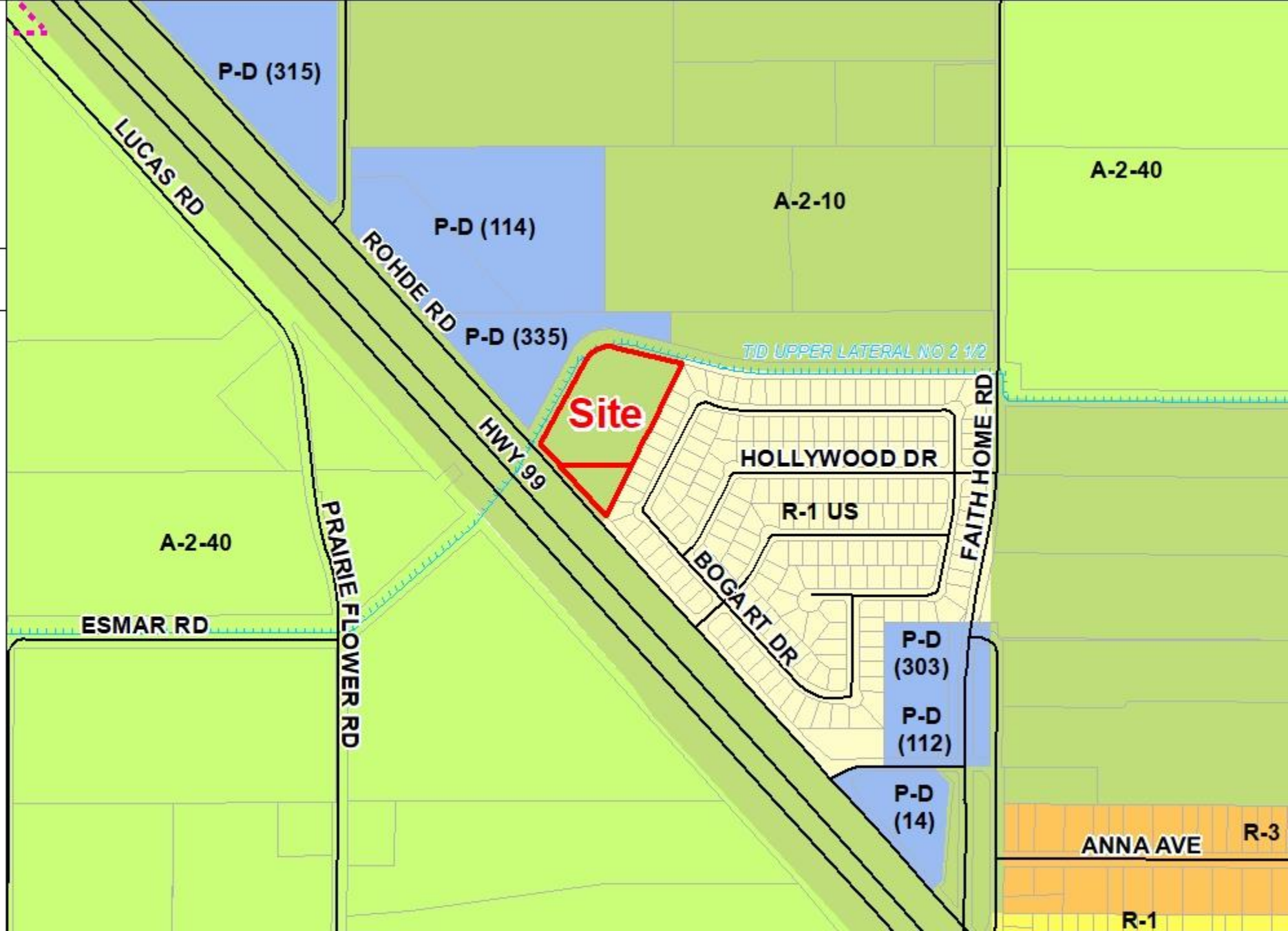
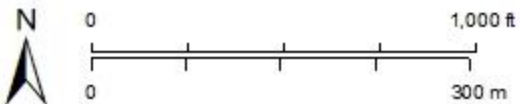
ZONING MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Parcel
-  Road
-  Canal

Zoning Designation

-  General Agriculture 10 Acre
-  General Agriculture 40 Acre
-  Planned Development
-  Single Family Residential
-  Single Family Residential
-  Multiple Family







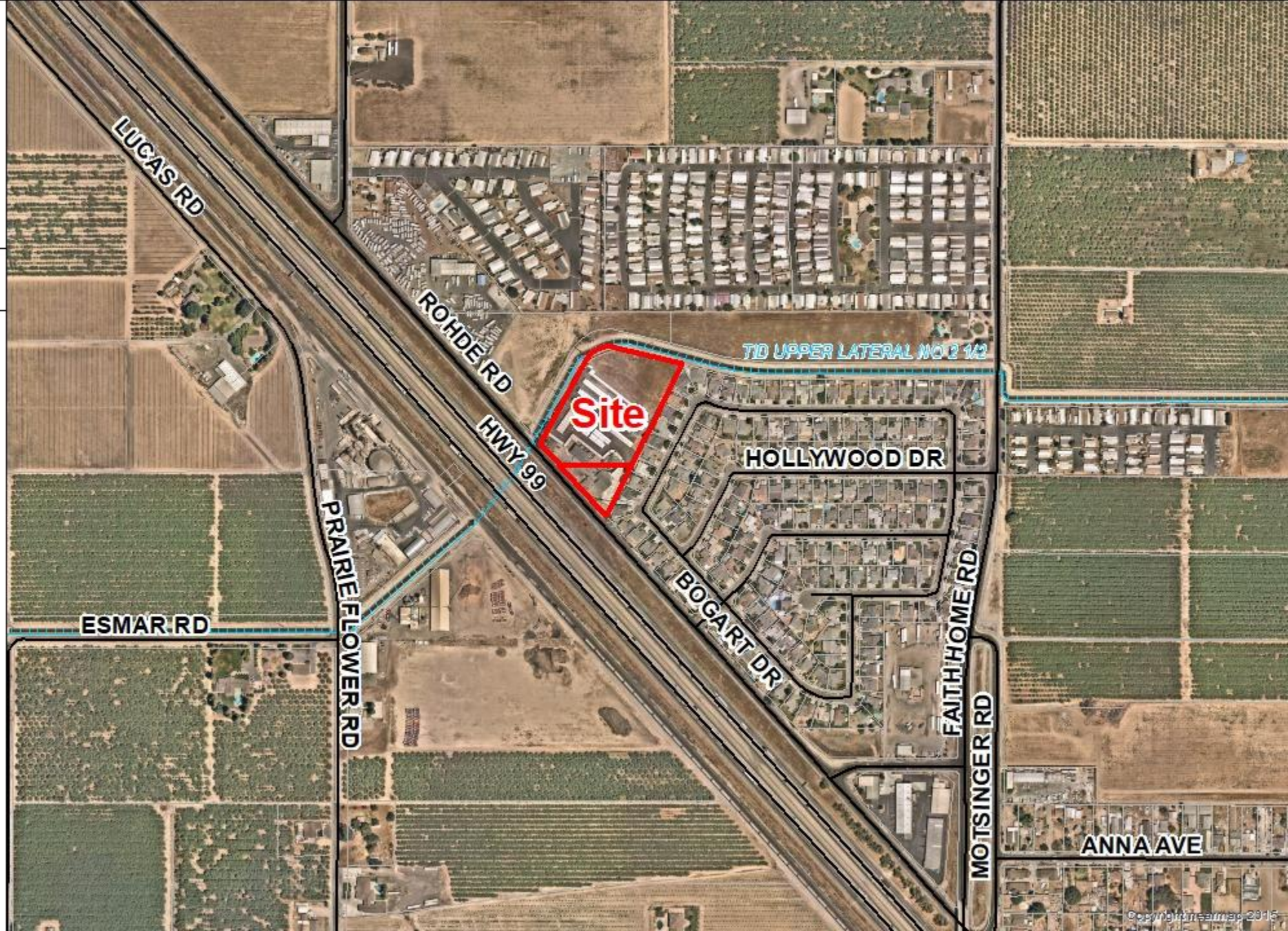
SECURED SPACE SOUTH STORAGE

GPA REZ
PLN2023-0031

2023 AERIAL AREA MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  Road
-  Canal



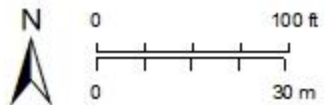
SECURED SPACE SOUTH STORAGE

GPA REZ
PLN2023-0031

2023 AERIAL SITE MAP

LEGEND

-  Project Site
-  Road
-  Canal



Source: Planning Department GIS

Date: 4/19/2023

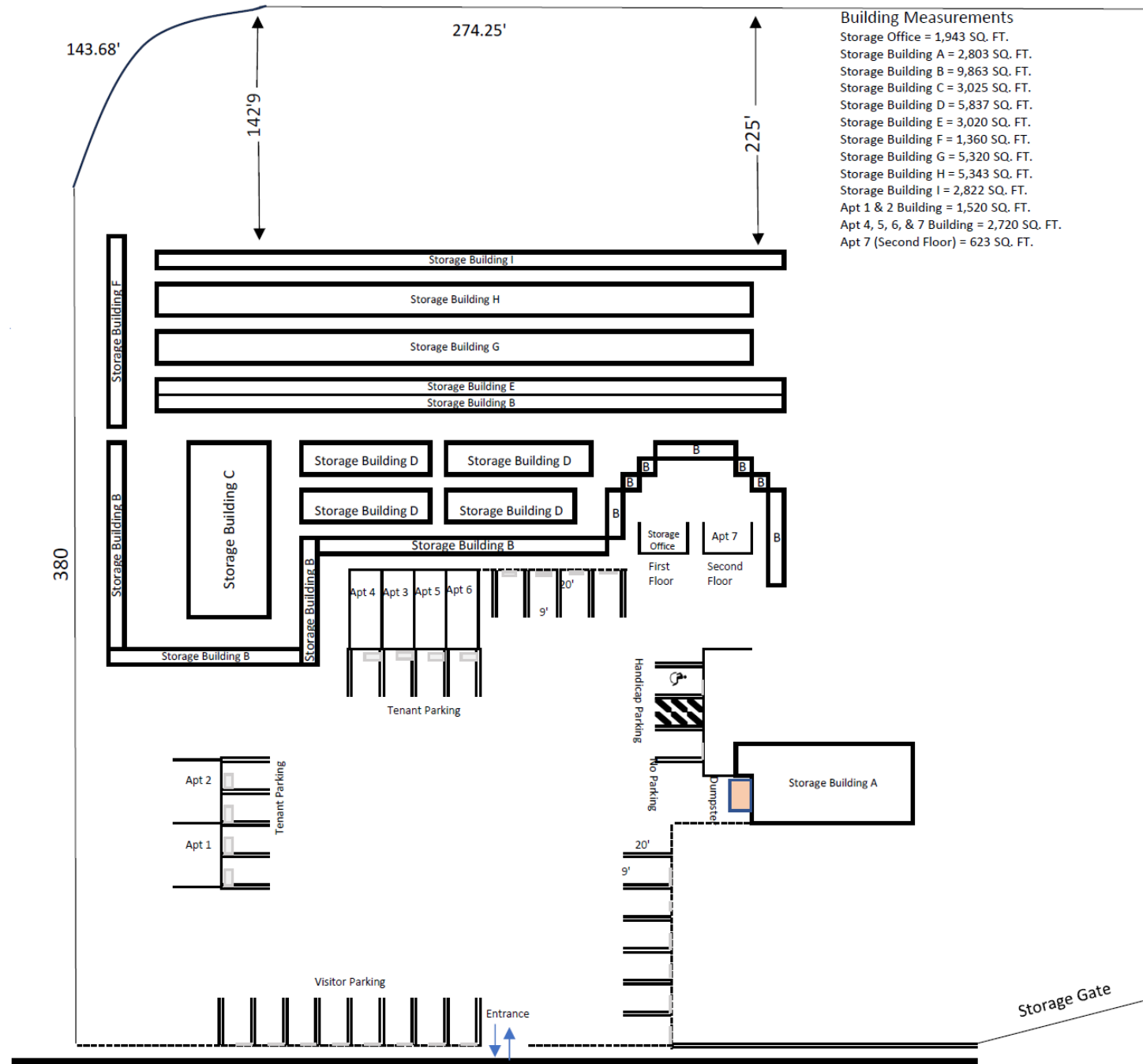


Copyright neamap 2016

SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

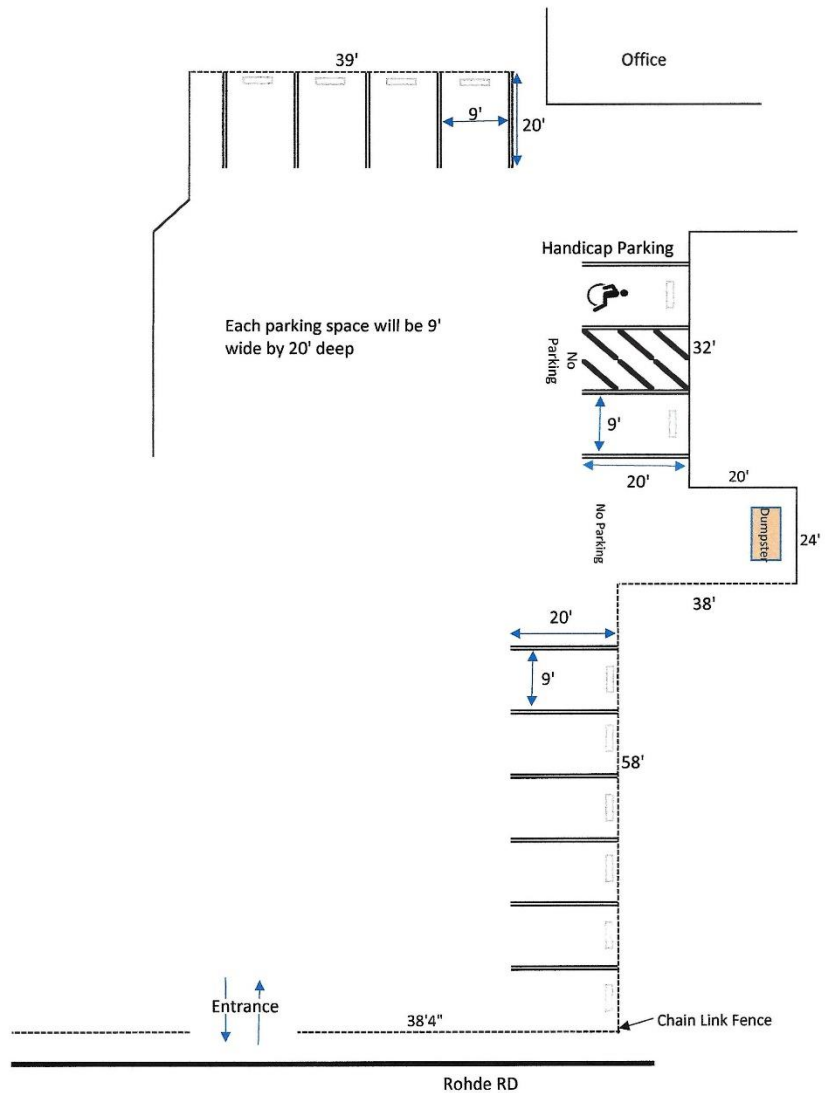
SITE PLAN



SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

PARKING PLAN



Issues

- Operating without permits
- Development Standards
 - Existing Fencing
 - Proposed Signage
 - Lighting
 - Merger
- Keyes Traffic Mitigation Impact Fee

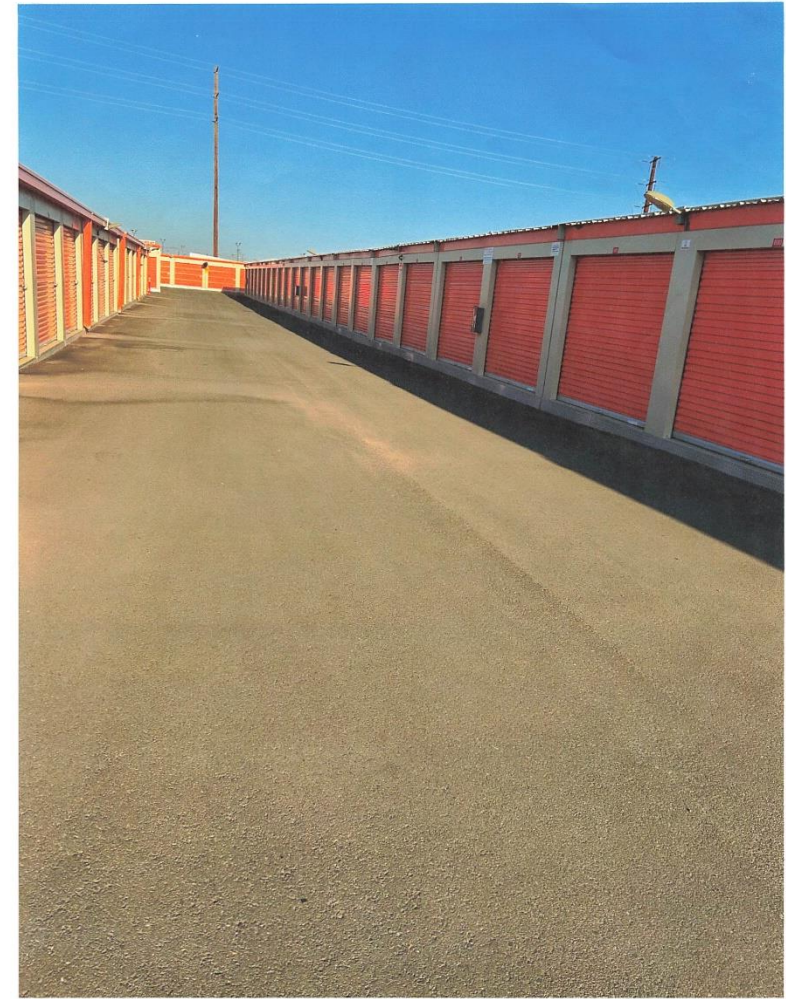
Issues

- **Operating without permits**
- Development Standards
 - Existing Fencing
 - Proposed Signage
 - Lighting
 - Merger
- Keyes Traffic Mitigation Impact Fee

**SECURED SPACE
SOUTH STORAGE**

**GPA REZ
PLN2023-0031**

SITE PHOTOS



Issues

- Operating without permits
- **Development Standards**
 - Existing Fencing
 - Proposed Signage
 - Lighting
 - Merger
- Keyes Traffic Mitigation Impact Fee



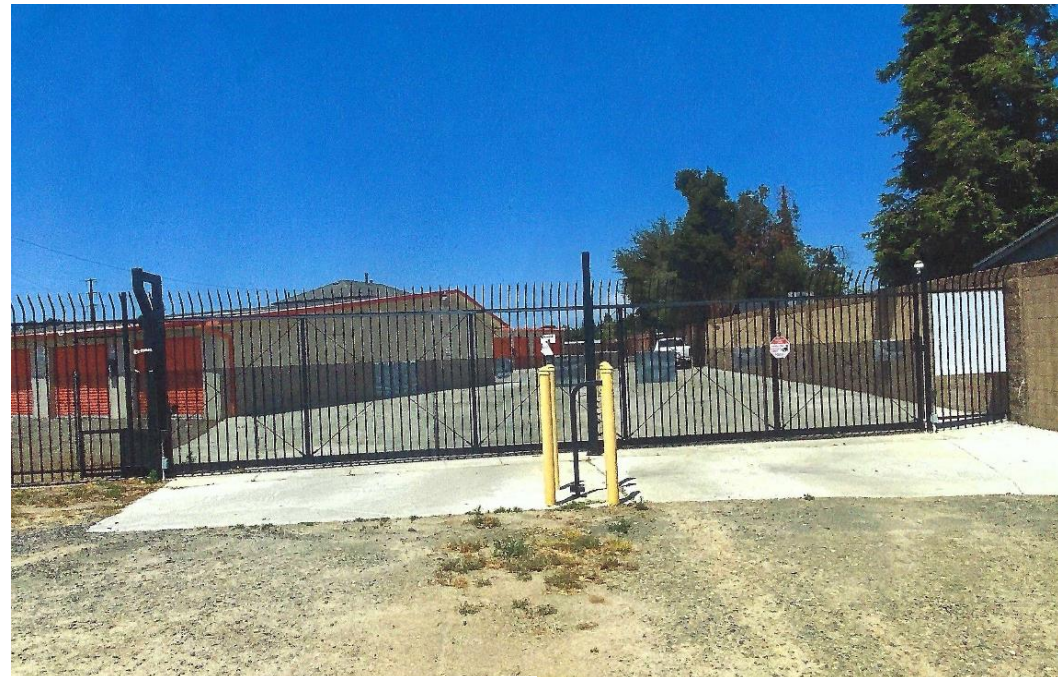
Issues

- Operating without permits
- Development Standards
 - **Existing Fencing**
 - Proposed Signage
 - Lighting
 - Merger
- Keyes Traffic Mitigation Impact Fee

**SECURED SPACE
SOUTH STORAGE**

**GPA REZ
PLN2023-0031**

SITE PHOTOS



Issues

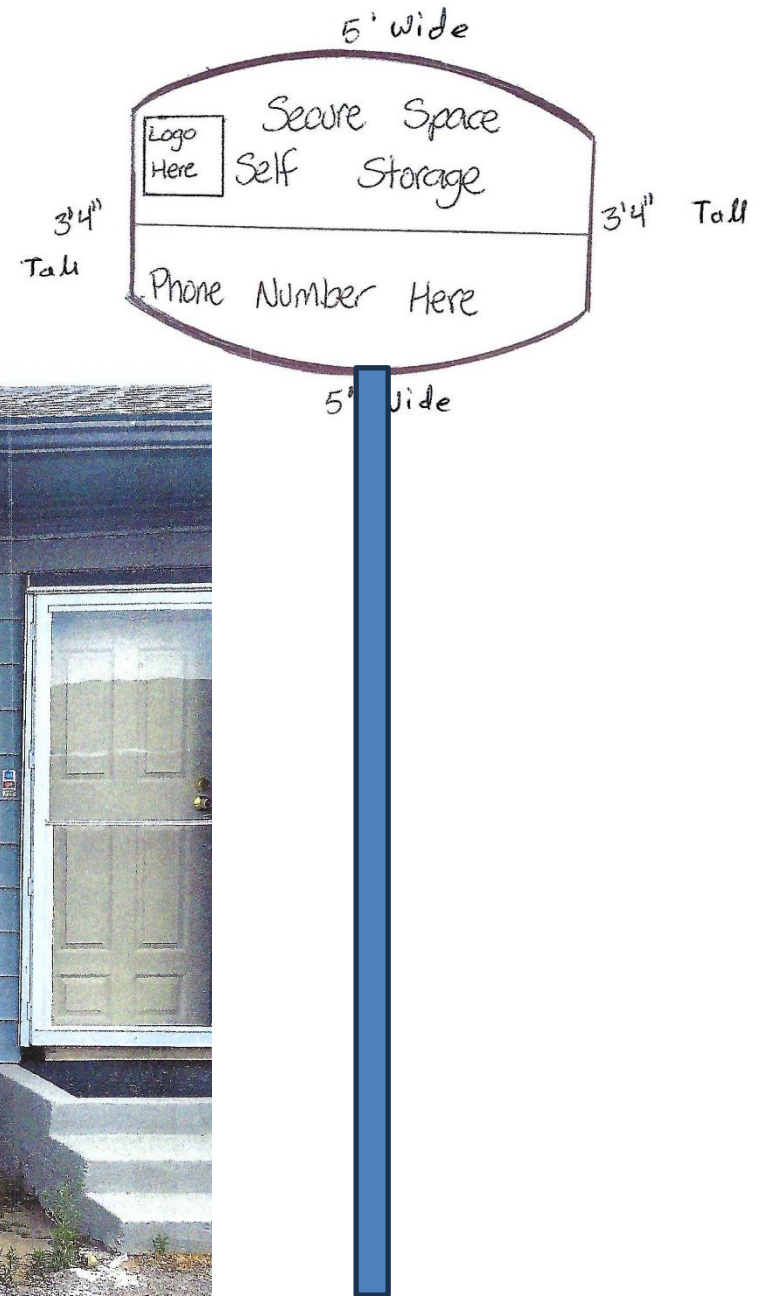
- Operating without permits
- Development Standards
 - Existing Fencing
 - **Proposed Signage**
 - Lighting
 - Merger
- Keyes Traffic Mitigation Impact Fee



**SECURED SPACE
SOUTH STORAGE**

**GPA REZ
PLN2023-0031**

PROPOSED SIGNAGE



Issues

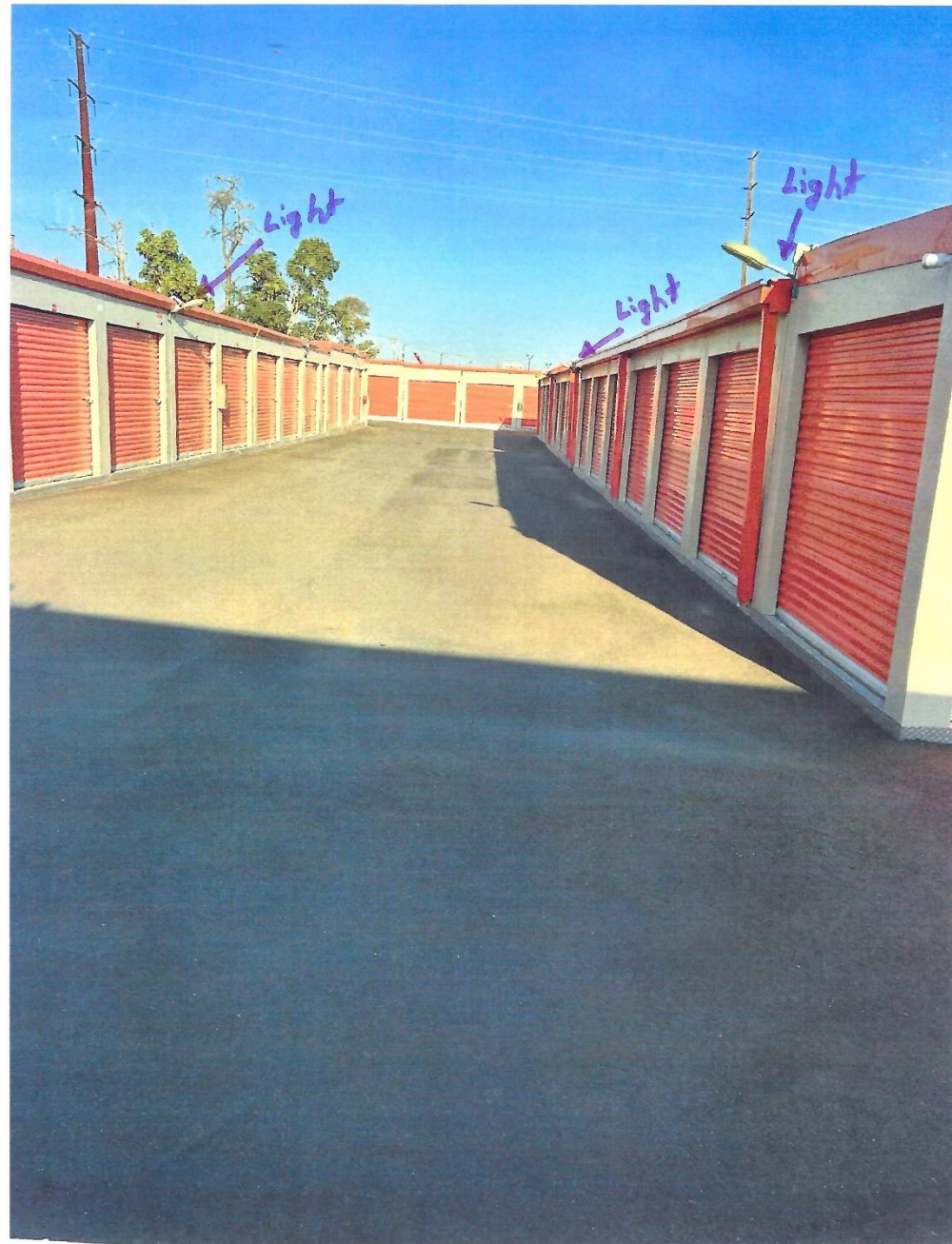
- Operating without permits
- Development Standards
 - Existing Fencing
 - Proposed Signage
 - **Lighting**
 - Merger
- Keyes Traffic Mitigation Impact Fee



**SECURED SPACE
SOUTH STORAGE**

**GPA REZ
PLN2023-0031**

LIGHTING



Issues

- Operating without permits
- Development Standards
 - Existing Fencing
 - Proposed Signage
 - Lighting
 - **Merger**
- Keyes Traffic Mitigation Impact Fee



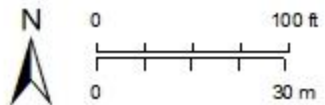
SECURED SPACE SOUTH STORAGE

GPA REZ
PLN2023-0031

2023 AERIAL SITE MAP

LEGEND

-  Project Site
-  Road
-  Canal



Source: Planning Department GIS

Date: 4/19/2023



Copyright neamap 2016

Issues

- Operating without permits
- Development Standards
 - Existing Fencing
 - Proposed Signage
 - Lighting
 - Merger
- **Keyes Traffic Mitigation Impact Fee**

General Plan and Zoning Consistency

General Plan

- Land Use Element
 - Planned Development (P-D)
 - Keyes Community Plan
 - Medium-Density Residential to Commercial
 - Gateway landscape treatments
 - Sphere of Influence Policy
 - Referral to Keyes CSD and Keyes MAC
- Agriculture Element
 - Ag Buffers

Zoning

- General Agriculture (A-2-10) to P-D
 - Amendments to the Zoning Designation must be found to be consistent with the General Plan
 - Planned Industrial development standards
 - Permitted uses limited to existing residential and mini-storage development
 - Further development would require additional land use permits



Environmental Review

- CEQA
 - Mitigated Negative Declaration
 - Keyes Community Plan
 - Amended to address comments received from the Ca Department of Toxic Substance Control
- Development Standards

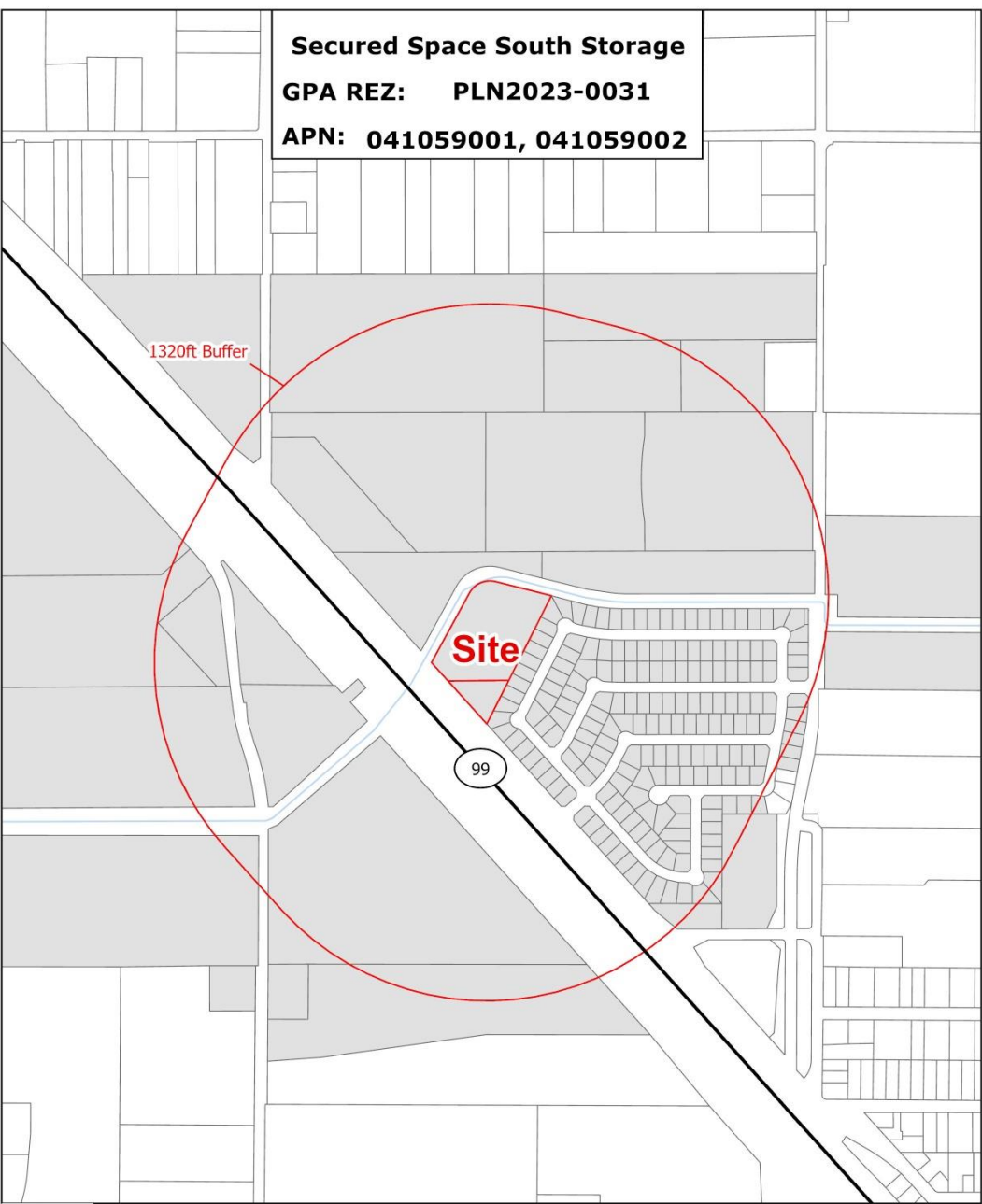
Recommendation

- Staff recommendation
 - Recommend project approval to the Board of Supervisors
- Findings – Exhibit A
 - Environmental Review
 - Including amended Mitigation Monitoring and Reporting Program
 - General Plan Amendment
 - Rezone
 - Project Approval

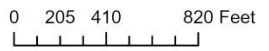


Questions?

Secured Space South Storage
GPA REZ: PLN2023-0031
APN: 041059001, 041059002



LAND OWNER NOTIFICATION AREA
December 18th, 2023 Total Parcels - 215



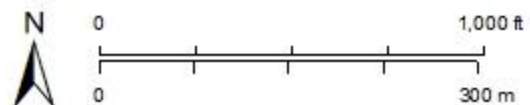
SECURED SPACE SOUTH STORAGE

GPA REZ PLN2023-0031

ACREAGE MAP

LEGEND

-  Project Site
-  Sphere of Influence
-  # Parcel/Acres
-  Road
-  Canal



Source: Planning Department GIS

Date: 4/19/2023

