



DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

1010 10th Street, Suite 3400, Modesto, CA 95354
Phone: 209.525.6330 Fax: 209.525.5911

MEMO TO: Stanislaus County Airport Land Use Commission
FROM: Department of Planning and Community Development
SUBJECT: **AIRPORT LAND USE COMMISSION APPLICATION NO. PLN 2014-0052 - STANISLAUS COUNTY AIRPORT LAND USE COMPATIBILITY PLAN UPDATE**

RECOMMENDATION

Based on the discussion below and on the whole of the record, staff is requesting that the Airport Land Use Commission (ALUC) approve Airport Land Use Commission Application No. PLN2014-0052 – Stanislaus County Airport Land Use Compatibility Plan Update. If the ALUC decides to approve the project, Exhibit A, provides an overview of all of the findings required for project approval.

PROJECT DESCRIPTION AND OVERVIEW

This proposed project is an update to the Stanislaus County Airport Land Use Compatibility Plan (ALUCP), which contains the proposed procedural and airport-specific policies for two public use airports in Stanislaus County: the Modesto City-County Airport, and the Oakdale Municipal Airport. Individual compatibility policies for the former Crows Landing Air Facility will be updated under a separate process.

The proposed ALUCP update reflects the anticipated growth of the Modesto City-County Airport and the Oakdale Municipal Airport for the next 20 years as required by California Public Utilities Code (PUC) Section 21670 et seq. The current ALUCP was originally adopted by the Airport Land Use Commission on August 3, 1978, and updated by the ALUC on May 20, 2004. The current ALUCP is referred to in this memo as the “2004 ALUCP” which is available for review at: <http://www.stancounty.com/planning/agenda-aluc/alucplan.pdf>

The creation of airport land use commissions (ALUCs) and the preparation of ALUCP’s are a requirement of the California State Aeronautics Act (SAA) pursuant to the PUC (Section 21670 et seq.) The purpose of the SAA is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses. An ALUC is required to adopt an ALUCP for each public use airport within its jurisdiction.

The Caltrans Division of Aeronautics has prepared an Airport Land Use Compatibility Plan Handbook, which identifies the essential steps for the preparation of an ALUCP. The current *California Airport Land Use Planning Handbook* (hereafter referred to as the “Handbook”) was adopted in 2011.

The proposed ALUCP update was prepared in tandem with the Stanislaus County General Plan Update. A Final Environmental Impact Report (FEIR), that addressed both the General Plan Update and the proposed ALUCP update, was prepared for the purposes of environmental analysis in accordance with the California Environmental Quality Act (CEQA). On August 23, 2016, the Stanislaus County Board of Supervisors, as lead agency, acted to certify the FEIR. The ALUC, as a Responsible Agency under CEQA, will use the FEIR to consider adoption of the ALUCP, in accordance with CEQA Guidelines Sections 15096.

The following objectives represent the overall goals of the proposed ALUCP Update:

- To update the County's ALUCP to reflect long-range airport plans associated with the County's public-use airports, reflect long-range land use plans, and facilitate future ALUC consistency determinations.
- To update the County's adopted ALUCP to comply with guidance set forth in the 2011 Caltrans Handbook.
- To update the County's adopted ALUCP to comply with changes to the SAA since 2004.

The discussion in this report will focus on the proposed updates to the ALUCP, including the environmental comments related to the ALUCP. A draft of the proposed ALUCP is included as Exhibit B of this Staff Memo. A discussion of the FEIR is provided in the "Environmental Review" section of this memo.

PROJECT LOCATION

The proposed ALUCP update provides revised policies and a revised Airport Influence Area (AIA) for the Modesto City-County Airport and the Oakdale Municipal Airport. The updated policies pertain to the portions of unincorporated areas within Stanislaus County, together with portions of the cities of Modesto, Oakdale, and Ceres which are located within an AIA. Special districts, school districts, and community college districts within AIA are also subject to ALUCP policies.

ALUCP UPDATE PROCESS

The Planning Department contracted with the consulting firm Jones and Stokes, now ICF International (ICF), to update both the Stanislaus County General Plan (General Plan) and ALUCP, and for the development of an Environmental Impact Report (EIR), in February of 2010. The contract included two sub-contractors: Mead and Hunt, airport land use consultant, who prepared the proposed ALUCP update, and Fehr and Peers, traffic consultant. Development of language and policy updates involved consultation with the Stanislaus Airport Technical Committee (a project working group that included land use planners from the affected jurisdictions and representatives from the Modesto City-County Airport and the Oakdale Municipal Airport). On February 6, 2014, a joint workshop for the Planning Commission and ALUC was held to provide an overview of the project.

In April of 2014, a Notice of Preparation (NOP) was distributed and a series of public meetings were held throughout the County to elicit public input on the updated documents and the possible environmental impacts of the updates of the General Plan and ALUCP. Subsequently, the Draft EIR (DEIR) was circulated for the required 45-day public review period, from April 19, 2016, to June 3, 2016. An overview of the comments received relating to the ALUCP Update is provided in the "Comments Received" section of this memo.

The SAA does not specify the method for public noticing procedures for adoption of an update to an ALUCP. However, the Handbook provides guidance for ALUCs to follow the notice procedures that are applicable to general plans and specific plans. The Planning Department has provided the required notices to agencies and stakeholders and public hearing notices have been circulated in the Modesto Bee, Oakdale Leader, and Patterson Irrigator, which are the papers of main circulation covering the areas subject to the ALUCP.

When an ALUCP is amended, as with its initial adoption, local jurisdictions have 180 days within which to; amend their general and specific plans to be consistent with the ALUCP, or; to overrule the ALUC by a two-thirds vote of the agency governing body, which requires the governing body to make findings that the agency's plans are consistent with the intent of the state airport land use planning statutes in the SAA.

DISCUSSION

The Stanislaus County ALUC is responsible for the adoption of an ALUCP for public-use airports in Stanislaus County. The 2004 ALUCP included the following public-use airports that were operating in the County at that time:

- Modesto City-County Airport
- Oakdale Municipal Airport
- Patterson Airport
- Turlock Airpark
- Crows Landing Naval Auxiliary Landing Field (now called the Crows Landing Airport)

Since adoption of the 2004 ALUCP, Patterson Airport has closed and the Turlock Airpark is in the process of being sold for non-aeronautical use. As neither is currently operating as a public-use airport, they are not addressed in the proposed ALUCP update.

The airport-specific ALUCP policies for the Crows Landing Airport will not be updated until plans for redevelopment of the former military airfield property are completed. Until that time the airport-specific policies for the Crows Landing Naval Auxiliary Landing Field presented in the 2004 ALUCP will remain in place.

The proposed ALUCP update considers the following four compatibility factors in accordance with the Handbook:

- Noise
- Safety
- Airspace protection (Federal Aviation Regulation Part 77)
- Overflight (annoyance, disclosure)

The policies set forth in the proposed ALUCP update will apply to all three airports, unless otherwise specified, but the geographic area in which the policies will be applied is specific to each Airport Influence Area (AIA). Each AIA identifies the area in which airport-related noise, overflight, safety, or airspace protection factors may significantly affect land uses or necessitate policy restrictions on those uses. Land use actions within the AIA are subject to ALUC review to determine consistency with ALUCP policies. The most significant revisions to the ALUCP update are summarized below by airport.

Modesto City/County Airport (MOD)

The ALUCP is based on the Airport Layout Plan (ALP) and Narrative Report that were prepared by the City of Modesto in 2009 and approved by the Federal Aviation Administration (FAA) in 2011. Based on that document, the airport will maintain its classification as an Airport Reference Code (ARC) C-II airport, which indicates that the size and type of aircraft accommodated by the airport is not expected to change.

Operational data in the ALP Narrative Report were reviewed to estimate operations over a 20-year timeframe. Aircraft noise data was obtained from the 2008 Noise Compatibility Study prepared by the City in accordance with Federal Aviation Regulation Part 150. The study included a baseline (2008) and two forecast levels of activity (2015 and “Long Range”). The “Long Range” forecast presented in the Part 150 study, served as the basis of the forecast operations and noise contours used in to prepare the proposed ALUCP update. Approximately 141,000 annual operations are anticipated for the 20-year planning horizon. Caltrans Aeronautics concurred with the use of the approved ALP and use of the Part 150 study long range forecast as the basis of the proposed ALUCP update. The AIA associated with the MOD remains similar to the area identified for the 2004 ALUCP. However, the following policy area maps were changed based on the most recent ALP and to reflect revised guidance set forth in the Handbook.

- The noise contours upon which policies are based cover a smaller area than the previous ALUCP to reflect the use of newer, quieter aircraft.
- The size and configuration of safety zones have changed to reflect changes in airport operations and new guidance provided in the Handbook.
- Overflight policies are included for the first time.
- A single set of policies was developed to address the portions of the County, City of Ceres, and the City of Modesto that occur within the AIA.

Oakdale Municipal Airport

The City of Oakdale adopted a Master Plan for the Oakdale Municipal Airport in 1998. The Master Plan included a 1,300-foot runway extension and upgrade to the airport reference code. The FAA did not support the proposed runway extension, and the City prepared a revised ALP and Narrative Report in 2014 that no longer depicts a runway extension or a change in the aircraft reference code and resubmitted the plan to the FAA.

The “long-term” forecast presented in the 2014 ALP and Narrative Report estimates that airport will support up to 52,000 annual operations, and this long-term forecast served as the basis of the operations and noise contours used in to prepare the proposed ALUCP update. Caltrans Aeronautics concurred that the aeronautical factors reflected in the 2014 ALP and Narrative Report are appropriate to serve as the basis of the ALUCP.

The AIA associated with the airport remains similar to the area identified in the 2004 ALUCP. However, the following policy area maps changed based upon the date presented in the 2013 plan.

- Noise contours were defined for the first time.
- New safety zones were developed to reflect new guidance provided by the Handbook.
- Overflight policies are included for the first time.

Crows Landing Airport

As noted above, the Compatibility Plan for Crows Landing Airport will not be revised at this time. The 2004 airport-specific policies for that airport will remain in effect until plans to redevelop the former military airfield are completed. The revised policies will be subject to environmental review pursuant to CEQA.

Stanislaus County Airport Land Use Compatibility Plan (ALUCP)

The proposed ALUCP update is organized into six chapters and appendices.

- Chapter 1, Introduction, establishes the overall context of airport land use compatibility planning in general and for Stanislaus County in particular.
- Chapter 2, Policies, presents airport compatibility and review policies that are applicable to each airport.
- Chapter 3, Individual Airport Policies and Compatibility Maps, presents the compatibility policy maps associated with each airport as well as the individual policies for that airport.
- Chapters 4 through 6 present the airport land use background information regarding each of the airports in sequence: Modesto City-County Airport and Oakdale Municipal. The individual policies associated with the Crows Landing Airport, which will comprise Chapter 6, will not be presented at this time.

The proposed ALUCP update includes appendices such as a copy of State statutes pertaining to airport land use commissions and other information pertaining to airport land use compatibility planning.

Airport Influence Areas

The Airport Influence Area (AIA) for each airport was identified using guidance set forth in the Handbook. In delineating the AIA for each airport, the geographic extents of four compatibility concerns were considered:

1. Noise: Locations exposed to potentially disruptive levels of aircraft noise.
2. Safety: Areas in which the risk of an aircraft accident poses heightened safety concerns for people and property on the ground.
3. Airspace Protection: Places where height and various other land use characteristics need to be restricted in order to prevent creation of physical, visual, or electronic hazards to flight within the airspace required for operation of aircraft to and from the Airport.
4. Overflight: Locations where aircraft overflying can be intrusive and annoying to many people.

Each compatibility concern is addressed separately in the proposed ALUCP update. Each AIA includes two areas, Referral Area 1 and Referral Area 2. Requirements for referral of land use actions to the ALUC for review differ between these two areas (see Exhibit B, Chapter 3, Airport Land Use Area Policy Map MOD-1 and OAK-1). Referral Area 1 encompasses locations where noise and/or safety represent compatibility concerns and airspace protection and overflight may also pose concerns. Referral Area 2 includes locations where airspace protection and/or overflight are compatibility concerns, but not noise or safety.

Existing Development

It is important to note that ALUCP policies do not apply to existing land uses. ALUCP policy 1.4.3 addresses existing land uses. As set forth in this policy, an existing land use is one that either physically exists or for which a local agency's commitments to the proposal have been obtained; prior to the ALUCP adoption date, in one or more of the following manners:

1. A tentative parcel or subdivision map has been approved and has not expired.
2. A vesting tentative parcel or subdivision map has been approved.
3. A development agreement has been approved and remains in effect.
4. A final subdivision map has been recorded.
5. A use permit or other discretionary entitlement has been approved and not yet expired.
6. A valid building permit has been issued and not yet expired.

The proposed ALUCP also addresses intensification of existing land uses, or revisions to approved development. If a new version of an approved tentative parcel or subdivision map is submitted, the use would no longer qualify as existing and; therefore, would be subject to ALUC review in accordance with the policies of the ALUCP. Similarly, if a local agency's commitment to a development proposal expires, the proposal would no longer qualify as an existing land use.

The ALUC has no ability to reduce or remove nonconforming or otherwise incompatible existing land uses from the airport environment. However, a proposed change to an existing use (i.e., reconstruction or redevelopment) is subject to ALUC review if the proposed change would result in increased nonconformity with the compatibility criteria. Nothing in the ALUCP prohibits development by right, such as construction of a single-family dwelling (provided it is not within Safety Zone 1), a secondary unit, etc. However, the sound attenuation and Avigation Easement dedication requirements set by the ALUCP apply to all development.

COMMENTS RECEIVED

The DEIR for the Stanislaus County General Plan and ALUCP Updates was circulated for the required 45-day public comment period from April 19, 2016, to June 3, 2016. Comments pertaining to the proposed ALUCP update were received from the following agencies and County resident:

1. California Department of Transportation, District 10
2. California Department of Transportation, Division of Aeronautics
3. Chevron USA
4. City of Ceres
5. City of Modesto
6. City of Turlock
7. Central Valley Regional Water Quality Control Board
8. Del Puerto Health Care District
9. Stanislaus LAFCO
10. Ryan Thornberry, for River Oaks Golf Course
11. Mark Boone, Salida Resident
12. San Joaquin County Public Works
13. San Joaquin Valley Air Pollution Control District (SJVAPCD)
14. Stanislaus County Environmental Review Committee.

The issues brought forth within each comment letter were evaluated in terms environmental significance and in terms of technical amendments needed to the draft documents for clarification purposes. Responses to all comments received are included in the FEIR (see Exhibit D). The discussion below includes a summary of only those comments specific to the proposed ALUCP Update (Caltrans Division of Aeronautics, City of Ceres, and Mr. Ryan Thornberry).

Mead & Hunt, on behalf of the Planning Department, has provided response letters to the three comment letters with comments specific to the ALUCP update. (See Exhibit E – Response to Comment Letters Provided by Mead & Hunt) The comment letters received are provided in the FEIR. (See Exhibit D) The following is a summary of responses to each individual ALUCP update related comment:

Caltrans, Division of Aeronautics

Comment 1: *The response received from Caltrans suggested the ALUCP could be expanded to present and demonstrate the far-reaching economic importance of the airport, the critical emergency service role and the ease of interstate and intrastate travel. Then policies affecting the airport can cite the discussion on this matter to support the policy.*

Response 1: Both the Modesto City-County Airport and the Oakdale Municipal Airport support emergency service, intrastate and interstate travel, and provide positive economic effects for their communities and the state as a whole. However, the inclusion of a discussion of the roles and economic impact for each airport is not required by statute, and would have no effect on the proposed ALUCP policies. The discussion will not be included at this time.

Comment 2: *Section 1.1.1 discusses the membership composition of the ALUC, and California Public Utilities Code Section 21670(b)(4) outlines the specific composition of members. The ALUCP should include a description of the ALUC membership and how it complies with PUC Section 21670(b)(4). Further, a copy of the ALUC formation document included in the appendices would be appropriate for reference.*

Response 2: The ALUC for Stanislaus County is a designated body consisting of the County Planning Commission and two additional members with expertise in aviation. Section 1.1.1 of the proposed ALUCP update will be amended to reflect this membership, and a copy of the ALUC Rules and Regulations will be provided as Appendix I.

Comment 3: *Section 1.4.3 discusses existing land use and its applicability to the airport land use compatibility process. The definition provided in the ALUCP does not mirror the policy in the Handbook. The Handbook's discussion of existing uses should not be considered as a policy, but as a resource to develop policy. It is within the authority of the ALUC to develop policy that represents the intent of the State Aeronautics Act and the Handbook.*

Response 3: Chapter 2, Section 1.4.3, of the proposed ALUCP update provides a definition of existing conditions that was developed using the Handbook and input from County staff. The definition reflects the authority and processes implemented by the jurisdictions within each airport's AIA pertaining to existing land uses and local discretionary review processes. No change to the text in Section 1.4 is warranted.

Comment 4: *ALUCP Chapter 2, Section 1.6 describes the overrule process and procedures. The ALUCP should spell out the review processes and procedures in more detail with respect to*

scheduling, number of hearings, noticing requirements and adoption of approval of carrying votes. The ALUCP review process should be consistent with the practices of the local government within Stanislaus County.

Response 4: Chapter 1, Introduction (Exhibit B, page 1-8), discusses the process that is available to local agencies to overrule an ALUCP, and the procedural requirements associated with that process (number of votes required, findings, review period for ALUC and Caltrans, etc.). The policies set forth in Chapter 2, Section 1.6, address what the ALUC would need to do in the event of an overrule. The detailed description of the ALUCP review process that the Caltrans Aeronautics is asking for with respect to scheduling, number of hearings, and noticing requirements would vary according to the jurisdiction requesting the overrule. No revision to Section 1.6 is proposed.

Comment 5: *ALUCP policy 2.1.2(b) and similar ALUCP policies establish the ALUCP secretary as the person responsible for making consistency determinations. The PUC does not provide for alternative review processes. When a general or specific plan or local planning action is submitted to an ALUC, it must be reviewed by the ALUC.*

Response 5: Chapter 2, Policy 1.5 provides a detailed description of the types of actions subject to ALUC review by statute. Policy 1.5.1 identifies the land use actions for which referral is always mandatory, which includes local agency adoption or approval of any new general plan, specific plan, or amendment that affects lands within the AIA. Consistency determinations on actions for which submittal to the ALUC is mandatory (general plans, specific plans, zoning ordinances) must be made by the ALUC itself and not be delegated to the ALUC Secretary. However, even prior to the time when a general plan has been made consistent with the ALUCP, PUC Section 21676.5(a) only states that “the commission *may* require the local agency to submit all subsequent actions....” Further, after a general plan has been made consistent, Section 21676.5(b) indicates that the ALUC *can* no longer require referral of actions. Under these circumstances, we see nothing in the statutes that prevents the ALUC from delegating these reviews to its Secretary. Note as well, that the ALUCP limits the Secretary to finding a project consistent with the ALUCP. If the Secretary finds the project is not consistent or has doubt about the consistency, the action must be forwarded to the ALUC for determination. No change to the document text is warranted.

Comment 6: *Table 2 (Exhibit B) shows that children’s schools, nursing homes, hospitals, and daycare centers are compatible or conditionally compatible in Safety Zone 6, except that school sites are prohibited within 0.5 mile of an airport. The Handbook does not specifically prohibit these uses, but states that the uses should be “limited” within the Traffic Pattern Zone (TPZ). It may be in the ALUC’s best interest to consider the prohibition of schools in the TPZ unless there is no other available site outside of the safety zone, or it could designate sites within the TPZ that may be appropriate and the basis for identifying these sites within the TPZ.*

Response 6: The Planning Department concurs with the comment. Table 2 will be amended accordingly.

Comment 7: *Background information for O27 (the Oakdale Municipal Airport) cites a left turning pattern as the basis for the angling of Safety Zone for in a westerly direction, instead of northwesterly which would be consistent with the generic safety zones found in the Handbook. According to the Division’s aviation safety officers, though a majority of aircraft take a left turn pattern, many take a straight out pattern. If there are other reasons for modifying the safety zone, please include such reasons in the discussion or modify the safety zone to include that are that would be part of Safety Zone 4 as illustrated in the Handbook.*

Response 7: As described in Chapter 5 (Exhibit B), approximately 60% of the flights at the Oakdale Municipal Airport (O27) operate using a left traffic pattern, and approximately 40% operate using a straight-out pattern. Safety Zone 4 was created by adjusting the generic patterns shown in the Handbook to accommodate both a straight-out pattern and a left turn pattern. Exhibit B, OAK-9A, which illustrates the Safety Zones identified for O27 overlaid upon the General Plan land use map, shows the location of Safety Zone 4 as extending westward to S. Stearns Road and northward to Sierra Road. Exhibit B, OAK-6 illustrates the generic zones provided by the Handbook. A comparison of the exhibits indicates that Safety Zone 4 encompasses a greater area than the area identified by the generic safety zones shown in the Handbook. The greater area accommodates the predominant left traffic pattern while encompassing nearly all of the area identified by the straight-out pattern. Safety Zone 4, as described in the Handbook, would include only a portion of the parcel southeast of the intersection of Sierra Road and S. Stearns Road, whereas the ALUCP encompasses the whole of the parcel. The generic pattern includes 2.7 acres of a large parcel located northeast of the intersection of Sierra and S. Stearns roads, which is not included in ALUCP Safety Zone 4. This 2.7 acre area was not included in order to provide a more easily defined boundary based on nearby geographic features and the predominance of the left pattern.

City Of Ceres

Comments: *The City of Ceres provided comments focused on the proposed ALUCP update regarding ALUCP Policy 3.3.2 and 3.3.4 and the discussion regarding density for the proposed safety zones surrounding the airports. The response requests that the ALUCP's Exhibit 1 and 2, which provide an example of an intensity calculation for a non-residential use, be expanded to include a residential example. The response letter proceeds to take issue with the requirements in the ALUCP, that requires projects be referred to the ALUC when located within Referral Area 2. The City's response letter also provided requests for clarifying information within the DEIR regarding recreation and water supply information and the draft Land Use Element of the Stanislaus County General Plan, which were not related to the proposed ALUCP update.*

Response:

As shown in Table 1 (Exhibit B), the residential densities proposed in Zones 3 and 4 are more restrictive in the proposed ALUCP update compared to the 2004 ALUCP as it relates to the City of Ceres. However, both proposed densities are consistent with the criteria set forth in the latest edition of the Handbook. In addition, the proposed ALUCP update provides for the development of infill, which is addressed by Policy 4.1.2, Infill (Exhibit B).

The County performed a detailed displacement analysis to identify potential conflicts between the City's General Plan land use map and the proposed ALUCP criteria. The difference between the number of units permitted by the City's General Plan and the number of units allowed under the proposed ALUCP indicated a theoretic displacement of up to 338 housing units. However, the City of Ceres' 2009 Housing Element included a thorough inventory of available land that was designated for residential development in the City and its Sphere of Influence to fulfill its Regional Housing Needs Allocation. According to the map, only four parcels designated for residential housing were located in the AIA for the Modesto City-County Airport, leading to a potential displacement of 32 units.

The City requested that the County provide a table or chart to identify undeveloped parcels available for development in the City and the level of residential development that would be allowed under the proposed ALUCP update. Providing such a table has the potential to be

misleading because it would not take into account existing development without a detailed parcel-by-parcel analysis, and it would not reflect opportunities for infill development or other site-specific conditions. Policy 3.3.2 and Table 2 (Exhibit B) identify the allowable residential development for the parcels identified in the City and other vacant parcels in the AIA.

The City requested that exhibits be created to illustrate intensity calculations and site splits for residential development by safety zone. A separate exhibit is not provided because the development of multiple dwellings on parcels containing multiple safety zones is described in Policy 3.3.9, Limits on Clustering (Exhibit B). To provide clarification regarding residential development, a note will be added to Exhibit 2 that refers to Policy 3.3.9.

The City requested amending language in Policy 4.3.3 (Exhibit B), which refers to the process that local agencies must define and follow when reviewing proposed land use changes within the Airport Influence Area, regardless of referral area, to specify the type of projects within Referral Area 2 that do not need to be routed to the ALUC staff for review and comment. As described in Section 4.3.3(b), a local agency has three options: it may define and implement a process for reviewing proposed changes, adopt the ALUCP by reference, or indicate that all or specific list of actions should be submitted to the ALUC for review. Policy 4.3.3 must be considered in relation to ALUCP Section 1.5, Types of Actions Subject to ALUC Review (Exhibit B). Once the ALUC finds that a local agency's general plan or specific plan is consistent with the ALUCP, referral will continue to be mandatory only for actions involving general plans, specific plans, zoning ordinances, and building codes. The ALUC will no longer have authority under state law to require that all actions, regulations, and permits be referred to the ALUC for review. However, the ALUC and local agency can agree that the ALUC should continue to receive, review and comment on individual projects/land use actions. Section 1.5.4, Major Land Use Actions (Exhibit B) lists the types of projects for which ALUC review is recommended or may be warranted. In terms of proposed actions in Referral Area 2, only the actions listed in Policy 1.5.4, paragraphs (a)(10) through (a)(13) require referral to the ALUC for review. Language will be added to Policy 4.3.3 to clarify the occasions the conditions or projects that would warrant ALUC review.

As the City points out, the page number at the end of Section 2 of the proposed ALUCP update is incorrect. A correction to the page number will be made.

Following the City's comment regarding residential development, the County reviewed the location of Safety Zone 3 and its relationship to air traffic patterns at the Modesto City-County Airport. Based on a review of runway use, it was determined that the configuration of Zone 3 associated with Runway 10L-28R could be revised to encompass a smaller area south of the approach end of Runway 28R. This revision is consistent with Caltrans guidance associated a runway with a single-sided traffic pattern and, as a result of this revision, a smaller portion of the City would be included in Safety Zone 3.

Additional comments were received from the City of Ceres following the County's initial response. The comments focused on the residential development criteria set forth in Policy 3.3.2 and Table 2 of the ALUCP.

- Within Zone 3, the City requested that new residential development be allowed at a maximum density of 1 dwelling unit per 2-acre parcel (0.5 du/acre) rather than a density of 1 dwelling unit per 5 acres (0.2 du/acre) as proposed in the ALUCP update.
- Within Zone 4, the City requested that new residential development be limited to a maximum density of 1 dwelling unit per 2.5-acre parcel (0.4 unit/acre) rather than a density of 1 dwelling unit per 5 acres (0.2 du/acre) as proposed in the ALUCP update.

Based on the guidance set forth in the Handbook, the density for new residential development near the Modesto City/County airport was revised at the City's request.

Ryan Thornberry, representative of the River Oaks Golf Course

Comments: *Ryan Thornberry provided an e-mail inquiry as to how the ALUCP will affect his current use of the River Oaks Golf Course and any future development for the site.*

Response: The proposed ALUCP update does not restrict any current uses. Any future uses will be subject to the compatibility restrictions of the ALUCP and may, depending on the use, require referral to the ALUC. Detailed analyses of the various future uses that may be restricted were provided to Mr. Thornberry as part of the response provided by Mead and Hunt (See Exhibit E).

All revisions to the proposed ALUCP update being recommended as a result of comments received, as discussed above, are reflected in Exhibit C – *Addendum of Changes to the Draft ALUCP* of this report. Upon adoption, the ALUCP will undergo final formatting, reflecting any changes as adopted by the ALUC and integration of the existing Crows Landing Airport policies which will remain in effect until new airport specific policies for the Crows Landing Airport are approved by the ALUC.

GENERAL PLAN CONSISTENCY – CITIES AND COUNTY

Each local agency having jurisdiction over land uses within an ALUC's planning area is required by state law to modify its general plan and any specific plans to be consistent with the ALUCP. The law says that the local agency must take this action within 180 days (six months) of ALUCP adoption or amendment. A general plan does not need to be identical with the ALUCP in order to be consistent with it. To meet the consistency test, a general plan must do two things: 1) it must specifically address compatibility planning issues, either directly or through reference to a zoning ordinance or other policy document; and 2) it must avoid direct conflicts with compatibility planning criteria. The land use jurisdictions affected by the proposed ALUCP update may need to modify their general plans, specific plans, and other policy documents to be consistent with the ALUCP.

It must be emphasized; however, that local agencies need not change land use designations to make them consistent with the ALUC criteria if the current designations reflect existing development. In such cases, they would need to establish policies to ensure that the nonconforming uses would not be expanded in a manner inconsistent with this Compatibility Plan and that any redevelopment of the affected areas would be consistent with the ALUCP. Compatibility planning issues can be reflected in a general plan in several ways:

- Incorporate policies into existing general plan elements.
- Adopt a general plan airport element.
- Adopt Compatibility Plan as stand-alone document.
- Adopt airport combining district or overlay zoning ordinance.

The ALUC ultimately determines if a jurisdiction's general plan is consistent with the ALUCP. In the case of Stanislaus County, the draft ALUCP update was completed in tandem with the development of the General Plan update, to ensure consistency and conformation to the current requirements of state law.

In the event of ALUCP adoption, the ALUC will perform a consistency review with each jurisdiction's General Plan. As stated, the County's recently adopted General Plan was already found to be consistent with the proposed ALUCP update. The City of Oakdale's General Plan has been preliminarily reviewed for consistency, and appears to be consistent with the ALUCP. The cities of Ceres and Modesto may need to take future action to ensure general plan consistency. However, no jurisdiction can request that the ALUC find their general plan to be consistent until the proposed ALUCP update is adopted. Following adoption, jurisdictions have 180 days to make their general plans consistent.

ZONING CONSISTENCY – CITIES AND COUNTY

As with general plans, a jurisdiction's zoning ordinance must also be consistent with the ALUCP. Any required subsequent zoning ordinance amendments, if needed, will be processed independently following adoption of the proposed ALUCP update and a finding of general plan consistency.

ENVIRONMENTAL REVIEW

Pursuant to the California Environmental Quality Act (CEQA), a program level EIR was prepared for both the Stanislaus County General Plan update and the proposed ALUCP update. The General Plan update was adopted and the FEIR was certified through a separate action by the Board of Supervisors on August 23, 2016. The FEIR consists of: the DEIR; comments and recommendations received on the DEIR; a list of persons, organizations, and public agencies commenting on the DEIR; responses of the Lead Agency of significant environmental points raised in the review and consultation period; and any other information added by the lead agency. (See Exhibit D – *Final Environmental Impact Report – Stanislaus County General Plan and Airport Land Use Compatibility Plan Updates*).

The DEIR provides a detailed overview of the project description, settings, a review of potential impacts, evaluation of alternatives, and cumulative impacts. Although impacts were identified to be significant and unavoidable for the overall project, the impacts are connected to the General Plan Update, and not the ALUCP update. The DEIR did not identify any significant and unavoidable impacts for the ALUCP.

Chapter Four – *Alternatives* of the DEIR provides an extensive comparison of environmental impacts of the project and project alternatives. The project alternatives include: a "No Project Alternative"; and "Alternative 2, Reduced Developable Area Alternative". Based on the assessment included in Chapter Four – *Alternatives* of the DEIR, neither of the alternatives would meet the project objectives.

An analysis of residential displacement was conducted for the County as part of the ALUCP update. The displacement analysis prepared for the EIR identified one 9.22 acre parcel and one 2.82 acre parcel near the Modesto City-County Airport that could be subject to policies restricting residential development and result in a potential conflict with the City of Ceres General Plan. The proposed ALUCP update would not displace any existing housing or result in conflicts that would displace future residential development to the extent that the City would be unable to meet its Regional Housing Needs Allocation requirement, which is the impact evaluated by CEQA. However, it could affect the potential for future development on these parcels. This impact was determined to be less than significant pursuant to CEQA.

Contact Person: Kristin Doud, Associate Planner, (209) 525-6330

Attachments:

- Exhibit A - Findings and Actions Required for Project Approval
- Exhibit B - Draft Stanislaus County Airport Land Use Compatibility Plan Update**
- Exhibit C - Addendum of Changes to Draft Airport Land Use Compatibility Plan
- Exhibit D - Final Environmental Impact Report – Stanislaus County General Plan and Airport Land Use Compatibility Plan Updates**
- Exhibit E - Responses to Comment Letters Prepared by Mead & Hunt
- Exhibit F - Environmental Review Referrals

**NOTE: COPIES OF THE DRAFT STANISLAUS COUNTY AIRPORT LAND USE COMPATIBILITY PLAN UPDATE (EXHIBIT B) AND FINAL ENVIRONMENTAL IMPACT REPORT (EXHIBIT D) ARE AVAILABLE FOR REVIEW AT THE COUNTY PLANNING DEPARTMENT OFFICE OR ON THE COUNTY'S WEBSITE AT: (<http://www.stancounty.com/planning/agenda-aluc/index.shtm>). HARD COPIES OF ALL EXHIBITS, IN THEIR ENTIRETY, HAVE BEEN PROVIDED TO EACH MEMBER OF THE AIRPORT LAND USE COMMISSION.

Exhibit A
Findings and Actions Required for Project Approval

1. Acting as a “Responsible Agency” pursuant to California Environmental Quality Act (CEQA) Guidelines sections 15051, 15052, 15096, 15152, and 15381, the Stanislaus County Airport Land Use Commission (ALUC) has reviewed and considered the Final Environmental Impact Report (FEIR), State Clearinghouse No. 2014042087, prepared for the *Stanislaus County General Plan (General Plan)* update and *Stanislaus County Airport Land Use Compatibility Plan (ALUCP)* update and certified by Stanislaus County acting as the “Lead Agency” and find that:
 - A. As a “Responsible Agency”, the ALUC independently evaluated the County’s certified FEIR, and has complied with all actions and guidelines pursuant to CEQA Guidelines section 15096 (a-i), and has reached an independent conclusion that the EIR adequately addresses the potential impacts related to the proposed ALUCP update being considered for approval by the ALUC.
 - B. On the basis of substantial evidence in light of the whole record, none of the conditions identified in the CEQA Guidelines section 15052 have occurred that would necessitate the ALUC assuming the role of Lead Agency from the County.
 - C. On the basis of substantial evidence in light of the whole record, none of the conditions identified in CEQA Guidelines section 15162 or 15163 have occurred that would necessitate preparation of a Subsequent EIR or Supplemental EIR as certified by the County.
 - D. All of the environmental impacts identified in the FEIR related to the proposed ALUCP update are less than significant and, as a result, no Findings of Fact or Statement of Overriding Considerations, as described in CEQA Guidelines sections 15091 and 15093, are necessary.
 - E. Find that no changes made to the proposed Airport Land Use Compatibility Plan Update after circulation involve significant new information necessitating re-circulation prior to adoption of the ALUCP as required by CEQA Guidelines section 15088.5.
2. Find That:
 - A. The County’s Planning and Community Development Department prepared the proposed ALUCP update as an amendment to the 2004 ALUCP.
 - B. The proposed ALUCP update was prepared in accordance with the guidance set forth in the California Department of Transportation’s *California Land Use Planning Handbook* (2011) and provides revised procedural policies and airport-specific policies for the Modesto City-County Airport and the Oakdale Municipal Airport.
 - C. Stanislaus County provided opportunities for the involvement of citizens, California Native American Indian tribes, public agencies, public utility companies, and civic, education and other community groups, through public hearing and community meetings in fulfillment of Government Code Sections 65351 and 65352.

- D. The proposed ALUCP update was prepared in coordination with the recently updated General Plan of August 2016 and that the General Plan is consistent with the proposed ALUCP update.
- 3. Rescind all policies in the adopted 2004 ALUCP, except those specifically associated with the Crows Landing Naval Auxiliary Landing Field, which will remain in effect until new airport-specific policies for the Crows Landing Airport are approved by the ALUC.
- 4. Approve Airport Land Use Commission Application No. 2014-0052 – Stanislaus County Airport Land Use Compatibility Plan Update, as recommended in the September 15, 2016, Airport Land Use Commission memo, including Exhibit C – Addendum of Changes to Draft Airport Land Use Compatibility Plan.

Exhibit B – Draft ALUCP***

Copies of the Draft Stanislaus County Airport Land Use Compatibility Plan are available for review at the County Planning Department Office, or on the County's Website at: <http://www.stancounty.com/planning/agenda-aluc/index.shtm>

***Hard copies of Exhibit B have been provided to each member of the Airport Land Use Commission as part of the October 6, 2016, Airport Land Use Commission Agenda packet.

Draft Stanislaus County Airport Land Use Compatibility Plan

Addendum No. 1

This addendum contains the proposed revisions to the Draft *Stanislaus County Airport Land Use Compatibility Plan* dated May 2014. Additions are shown underlined; deletions in ~~strikeout~~. Only substantive changes are identified below; if necessary, minor typographical corrections also may be made prior to publication of the final document and the date in the footer and title pages will be revised. After adoption of the *Compatibility Plan* by the Stanislaus County Airport Land Use Commission, all revisions will be incorporated into the *Compatibility Plan* and a final document will be prepared.

Chapter 2, Policies

Page 2-1: The Caltrans Division of Aeronautics requested that the description of the Airport Land Use Commission (ALUC) provided in Section 1.1.1 be amended to describe how the ALUC complies with PUC Section 21670(b)(4). The definition in Section 1.1.1 will be revised as follows:

- 1.1.1 *Airport Land Use Commission:* The Stanislaus County Planning Commission was appointed as a designated body to act as the Stanislaus County Airport Land Use Commission (ALUC) on December 1, 1970, by the City-County Committee and the Board of Supervisors in accordance PUC Section 21670.1. The nine-member Planning Commission, which includes representatives from all five County districts, is augmented by two additional members with aviation expertise when acting in the capacity of the Airport Land Use Commission. (Stanislaus County ALUC Rules and Regulations are presented as Appendix I.) Stanislaus County Airport Land Use Commission is formed and operates in accordance with the requirements of California State law. The Stanislaus County Planning Commission plus two additional members with aviation expertise comprise the ALUC which is designated to serve Stanislaus County.

Page 2-25, Policy 3.3.2, Residential Development Criteria, will be revised as follows to be consistent with Table 2 and to reflect that not all parcels in Zone 2 extend to the edge of the Safety Zone. Densities for new residential densities in Zones 3 and 4 for the Modesto City-County Airport will be revised to incorporate changes requested by the City of Ceres.

- 3.3.2 (a)(2). ~~Within Safety Zone 2, portions of new residential lots are allowed as long as the new dwelling unit is not situated within zone boundaries~~ new residential development shall be limited to a maximum Density of 1 dwelling unit per 10 acres (0.1 dwelling unit per acre) and the dwelling unit site shall be situated outside of the safety zone where feasible.
- 3.3.2(a)(3). ~~Within Safety Zones 3 and 4, new Residential Development shall be limited to a maximum Density of 1 dwelling unit per 5.0 acres (0.2 dwelling unit per acre)~~
- 3.3.2(a)(3). Within Safety Zone 3, new Residential Development shall be limited to a maximum Density of 1 dwelling unit per 5.0 acres (0.2 dwelling unit per acre), except in the Airport influence Area associated with the Modesto City-County Airport, where the maximum Density shall be 1 dwelling unit per 2.0 acres (0.5 dwelling unit for acre).
- 3.3.2(a)(4). Within Safety Zone 4, new Residential Development shall be limited to a maximum Density of 1 dwelling unit per 5.0 acres (0.2 dwelling unit per acre), except in the Airport influence Area associated with the Modesto City-County Airport, where the maximum Density shall be 1 dwelling unit per 2.5 acres (0.4 dwelling unit for acre).

Subsequent paragraphs will be renumbered to accommodate this change.

Page 2-32: Policy 3.3.1, Lot Coverage Limits, will be revised as to coincide with Table 2 and to correct an error:

- 3.3.10, *Lot Coverage Limits:* In addition to the single-acre Density and Intensity limits set by Policy ~~3.3.9~~ 3.3.2 and 3.3.3, new residential and nonresidential development associated with the Airport

Influence Areas for the Oakdale Municipal Airport and the Crows Landing Airfield shall also be limited with respect to lot coverage—the percentage of the project site covered by buildings. The specific lot coverage limits for each safety zone are shown in Table 2:

- Zone 1: No coverage
- Zone 2: 35 percent
- Zones 3 to 5: 45 percent
- Zone 6: 100 percent (no limit)

Page 2-33, Figure 2. The City of Ceres requested that Exhibit 2 be modified or an additional figure added to address residential development in sites split by safety zones. The construction of multiple dwelling units in split parcels is addressed in Policy 3.3.9, Limits on Clustering. For clarification, the following note will be added to Exhibit 2:

Refer to Policy 3.3.9, Limits on Clustering, on guidance for the development of multiple dwellings on parcels split by multiple safety zones.

Page 2-45: The City of Ceres posed a question about Policy 4.3.3, Establishment of Review Process, regarding ALUC review of proposed actions in AIA Referral Area 2. The City requested that additional language be provided in Policy 4.3.3 to describe when ALUC review is needed and for which projects. However, Policy 1.5 identifies the actions that must be reviewed by the ALUC in both Referral Area 1 and Referral Area 2. In response to the City's comment, the following text will be added to the end of Policy 4.3.3 to provide clarification:

Local agencies must refer all proposed actions identified in Policy 1.5.4, Major Land Use Actions, to the ALUC for review until such time that the ALUC finds that the agency's general plan or specific plan is consistent with the ALUCP or the local agency has overruled an ALUC determination of inconsistency regarding the general plan or specific plan.

Table 2, Safety Compatibility Criteria, pages 2-53 to 2-57, will be revised as follows:

- Renumber pages to become sequential as 2-51 through 2-55. (This change is in response to a comment by the City of Ceres.)
- Page 2-51, Single-Family Residential individual dwellings, townhouses, was revised as follows for clarification:

Zone 2: ~~Acceptable only if dwelling site is not within of zone boundaries. Incompatible at density >1 d.u./10 acres, and the dwelling unit shall be outside of zone boundaries where feasible.~~

Zone 3: ~~Incompatible at density >1 d.u./5 acres sitewide average or 0.2 d.u. per any single acre, except in the AIA for the Modesto City-County Airport, where density.1 d.u./2 acres sitewide average or 0.5 d.u. per any single acre~~

Zone 4: ~~Incompatible at density >1 d.u./5 acres sitewide average or 0.2 d.u. per any single acre, except in the AIA for the Modesto City-County Airport, where density.1 d.u./2.5 acres sitewide average or 0.4 d.u. per any single acre~~

- Page 2-54, Children's Schools, will be revised as follows in response to a recommendation made by the Caltrans division of Aeronautics:

Zone 6: ~~Not allowed unless there are no other available/feasible sites outside of the safety zone. No new sites or land acquisition within ½ mile of runway.~~

Chapter 3, Individual Airport Policies and Compatibility Maps

While considering comments received on the EIR, the County reviewed the size and location of Safety Zone 3 and its relationship to the air traffic pattern associated with the primary runway at the Modesto City-County Airport. It was determined that the configuration of Safety Zone 3 associated with Runway 10L-28R could be revised to encompass a smaller area south of the approach end of Runway 28R. This change is consistent with Caltrans guidance associated a runway with a single-sided traffic pattern. Figure Map Mod-3 was revised to reflect a single-sided traffic pattern (see attached).

Chapter 4, Background Data: Modesto City-County Airport and Environs

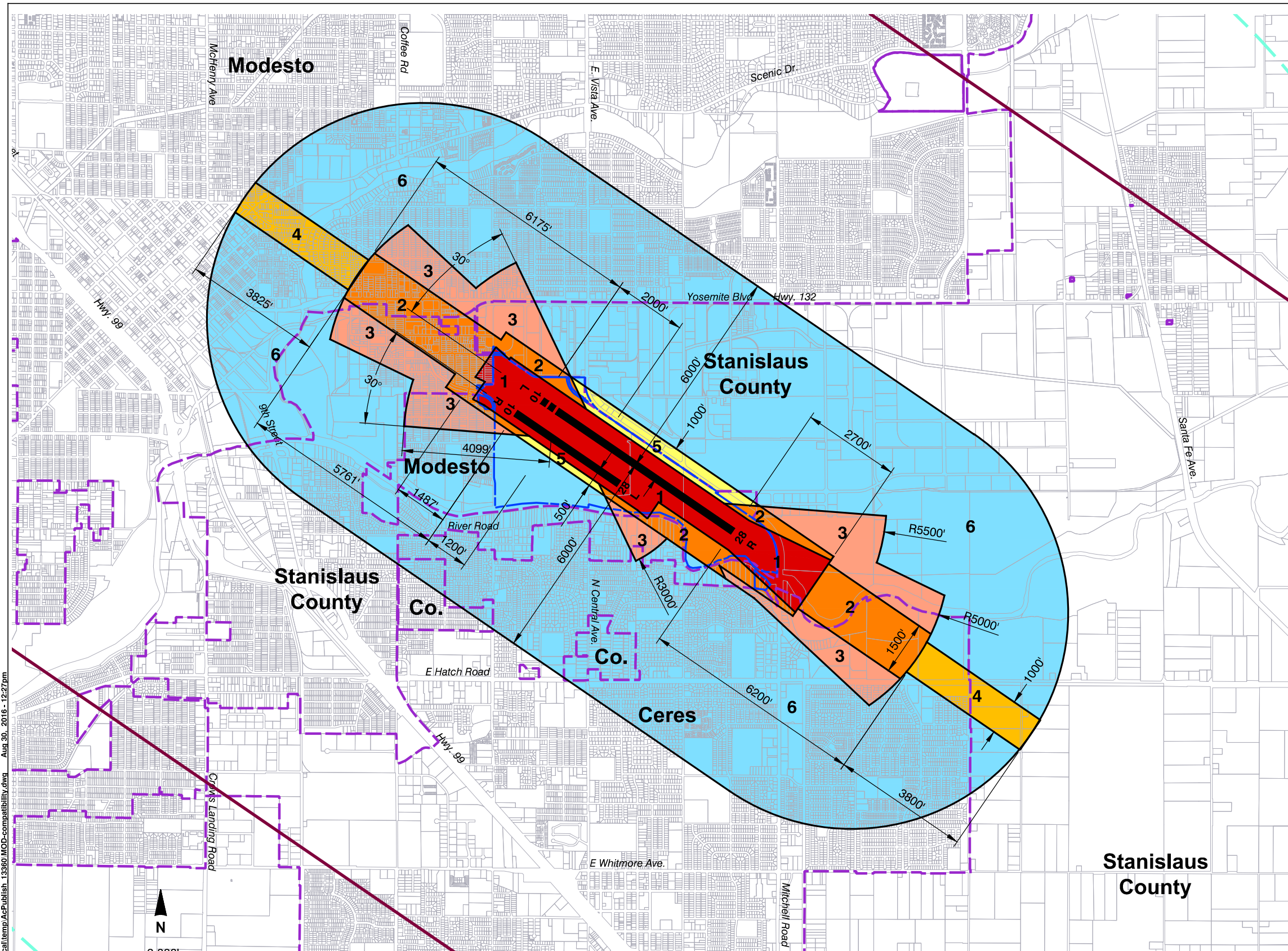
The following figures were revised to reflect the change in Safety Zone 3 associated with the Modesto City-County Airport:

- Exhibit MOD-6: Safety Factors
- Exhibit MOD-9A: Existing Land Uses, Modesto General Plan
- Exhibit MOD-9B: Existing Land Uses, Ceres General Plan
- Exhibit MOD-9C: Existing Land Uses, Stanislaus County General Plan

A copy of each revised figure is attached.

Appendices

At the request of the Caltrans Division of Aeronautics, Appendix I, Draft Stanislaus County Airport Land Use Commission Rules and Regulations” was incorporated into the document (see attached).



Legend

Boundary Lines

- Airport Property Line
- City Limits
- Existing Runway
- Future Runway
- Airport Influence Area

Safety Zones (Composite)

- Zone 1 Runway Protection Zone
- Zone 2 Approach/Departure Zone
- Zone 3 Inner Turning Zone
- Zone 4 Outer Approach/Departure Zone
- Zone 5 Sideline Zone
- Zone 6 Traffic Pattern Zone

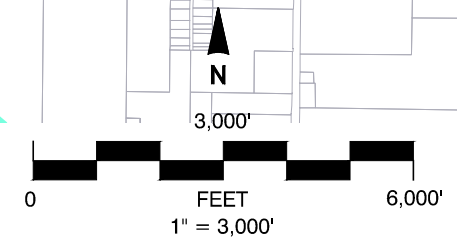
- Notes**
1. Safety zone source: California Airport Land Use Planning Handbook (January 2002).
 2. Composite safety zones reflect existing runway configuration and 500' extension. Composite zones combine large air carrier runway zones, medium general aviation runway zones, and long general aviation runway zones for Runway 10L-28R.
 3. Short general aviation zones were used for Runway 10R-28L.
 4. Zone 1 has been adjusted to reflect runway protection zones depicted on the Airport Layout Plan (December 2009).

Stanislaus County
Airport Land Use Compatibility Plans
 (August 2016 Draft)

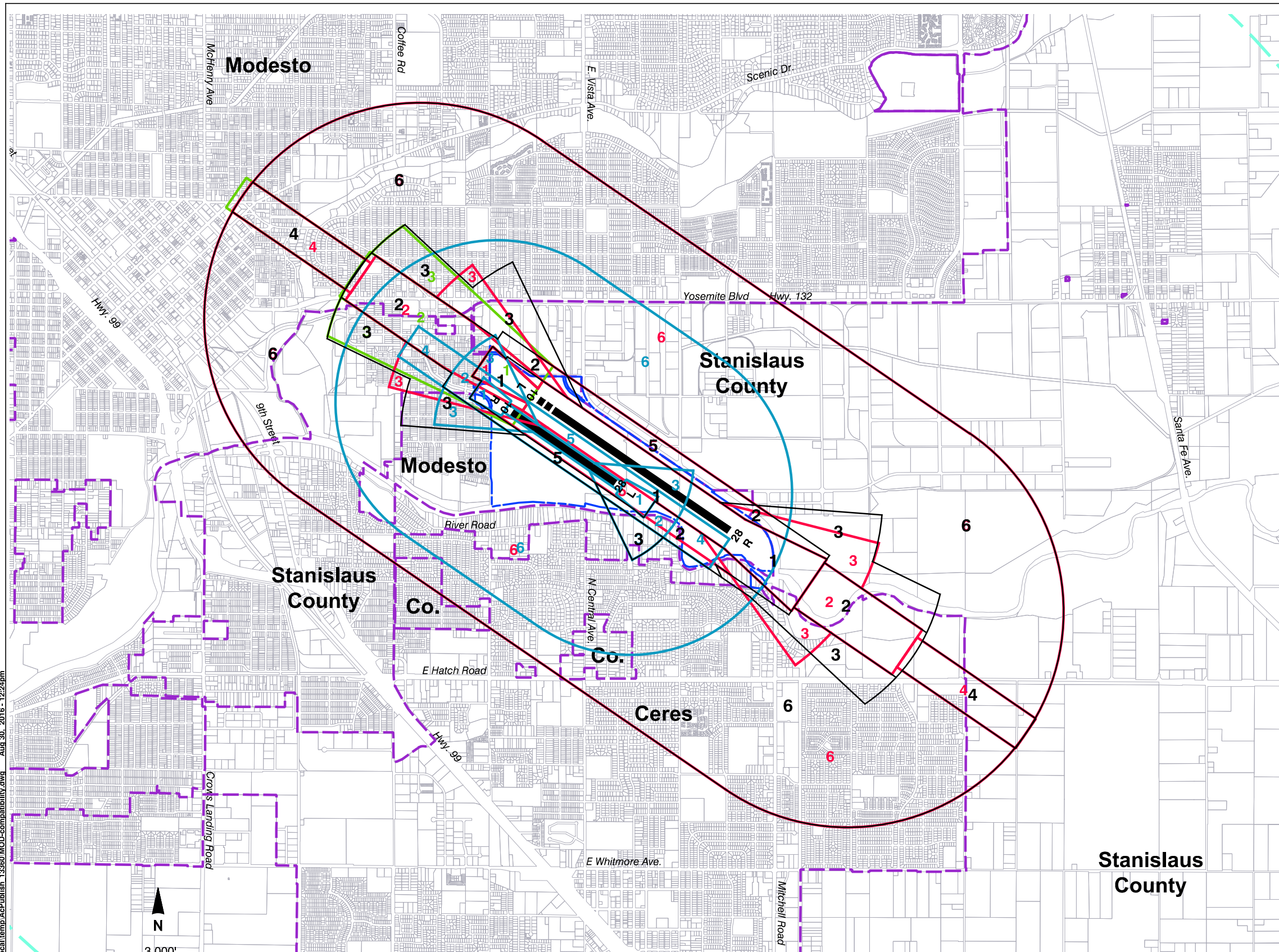
Map MOD-3

Airport Safety Zones Policy Map
 Modesto City-County Airport

C:\Users\B70me\AppData\Local\Temp\AcPublish_13360.MOD-compatibility.dwg Aug 30, 2016 - 12:27pm



Prepared By: **Mead&Hunt** www.meadhunt.com



Legend

- Boundary Lines**
- Airport Property Line
 - City Limits
 - Existing Runway
 - - - - - Future Runway

Safety Zone Factors

- Generic Long Length General Aviation Runway
- Generic Short Length General Aviation Runway
- Generic Large Air-Carrier Length General Aviation Runway
- Safety Policy Zones

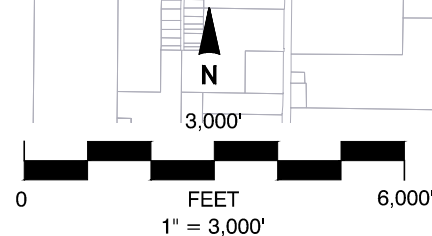
Notes

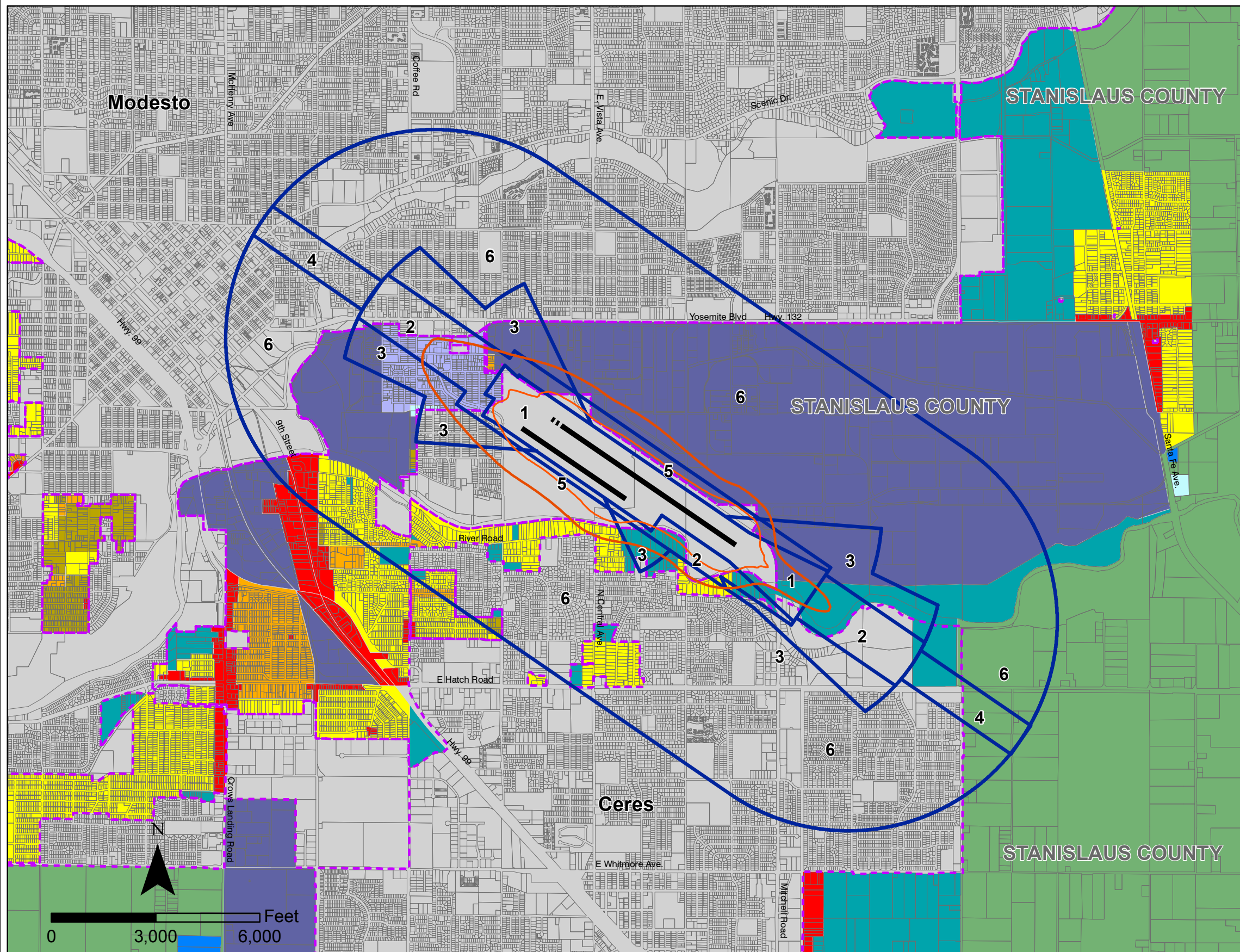
1. Safety zone source: California Airport Land Use Planning Handbook (January 2002).
2. Composite safety zones reflect existing runway configuration and 500' extension. Composite zones combine large air carrier runway zones, medium general aviation runway zones, and long general aviation runway zones for Runway 10L-28R.
3. Short general aviation zones were used for Runway 10R-28L.
4. Zone 1 has been adjusted to reflect runway protection zones depicted on the Airport Layout Plan (December 2009).

Stanislaus County
Airport Land Use Compatibility Plans
 (August 2016 Draft)

Exhibit MOD-6

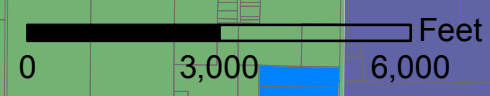
Safety Factors
 Modesto City-County Airport





Legend

- City Boundary
- Layer**
- Airport Safety Zones
- Existing Runway
- Future Runway Extension
- 60dB CNEL Noise Contour
- 65dB CNEL Noise Contour
- Safety Zones (composite)
- Stanislaus County General Plan**
- Agriculture
- Commercial
- Estate Residential
- Hwy. Commercial/Planned Devpt.
- Historical
- Industrial Business Park
- Industrial
- Industrial Transition
- Low Density Residential
- Medium Density Residential
- Medium High Density Residential
- Planned Development
- Planned Industrial
- Specific Plan 1
- Urban Transition
- City

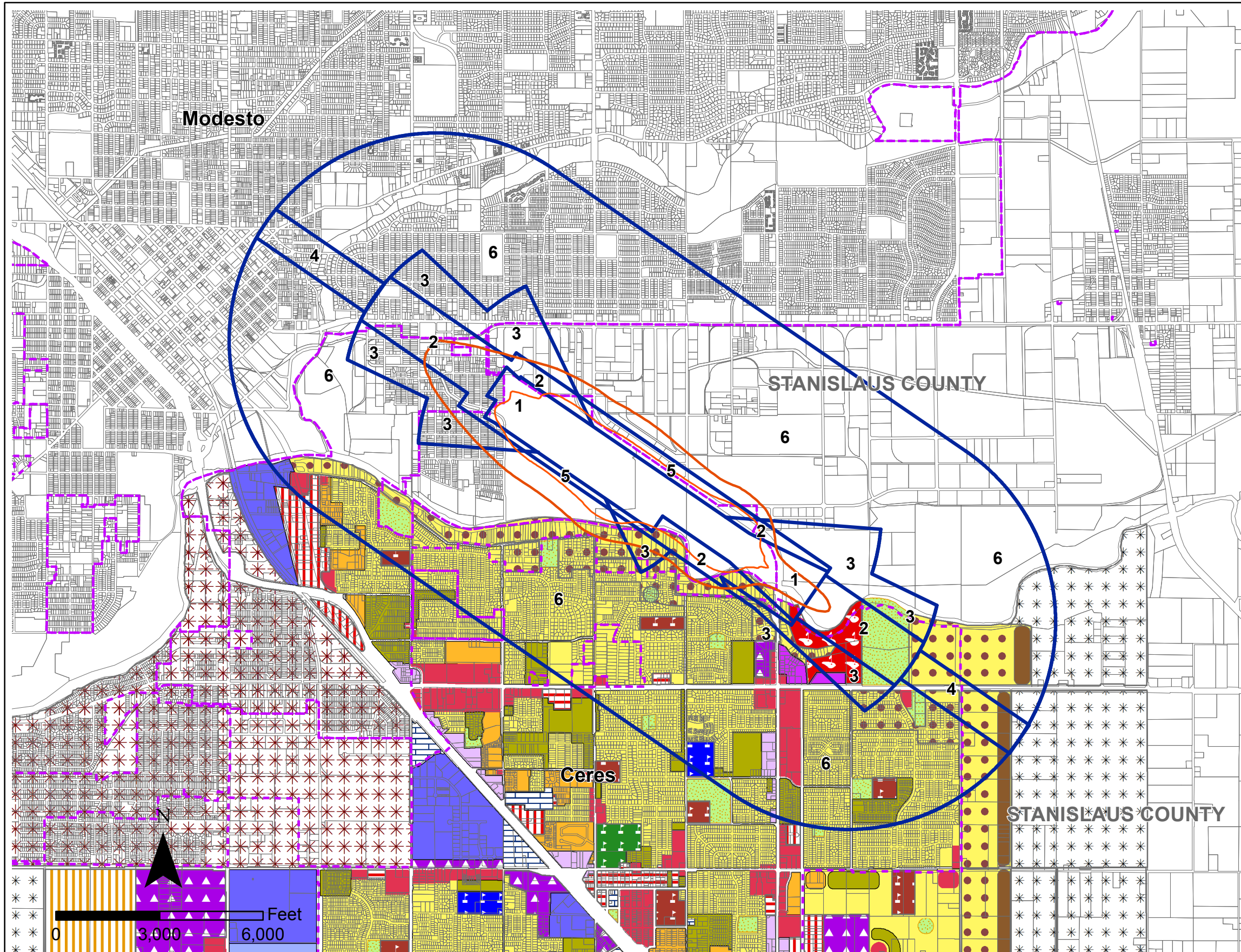


Stanislaus County
Airport Land Use Compatibility Plans
 (August 2016 Draft)

Exhibit MOD 9C

Sources: City and County GIS Data (2009)

Stanislaus County General Plan
 Modesto City-County Airport



Legend

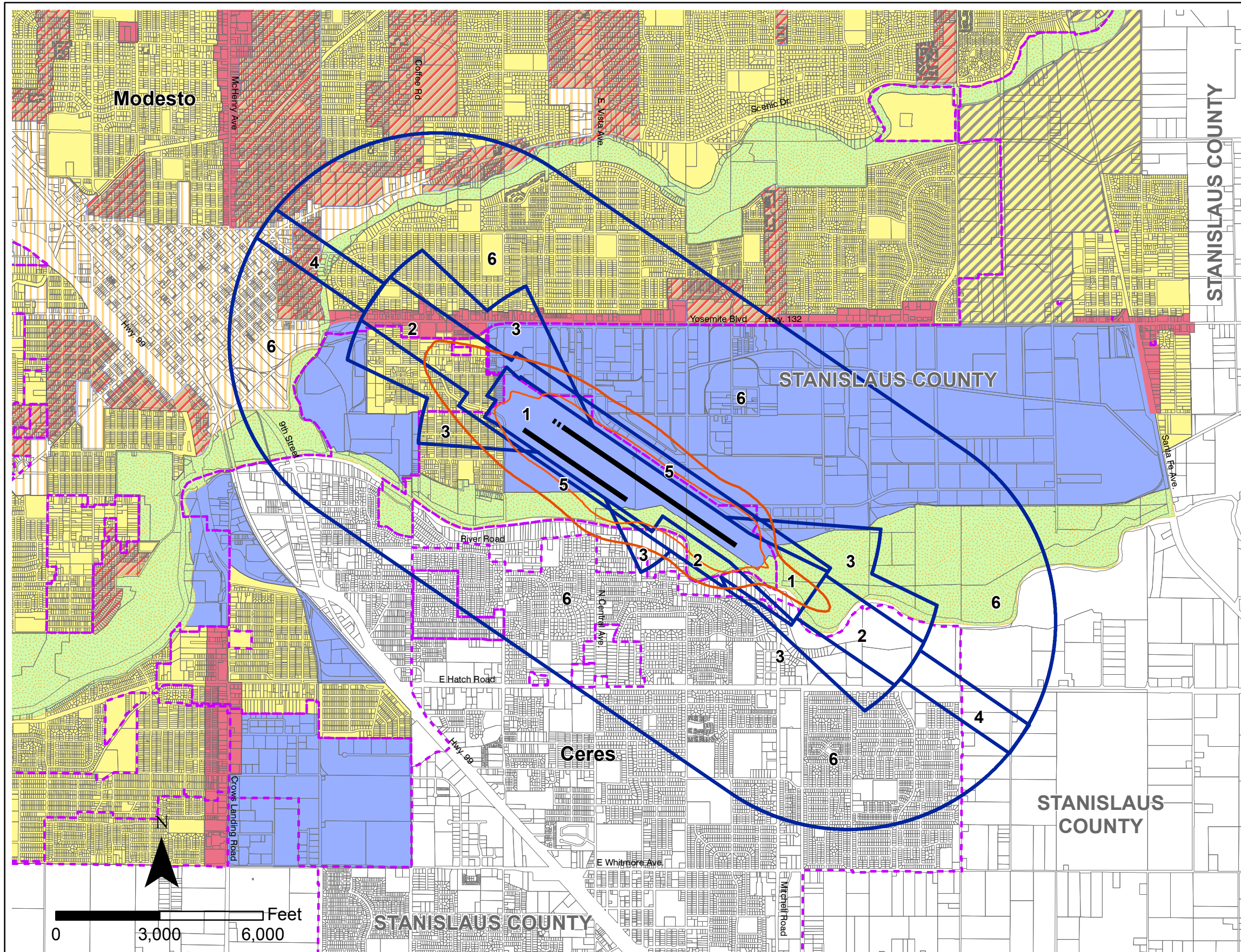
- City Boundary
- 60dB CNEL Noise Contour
- 65dB CNEL Noise Contour
- Layer**
- Safety Zones (composite)
- City of Ceres General Plan**
- Agriculture
- Adjacent Urban
- Business Park
- Commercial - General
- Community Facilities
- Community Facilities - PSF
- Commercial - Recreation
- School - Elementary
- Industrial - General
- School - High
- Residential - High Density
- School - High
- Industrial - Reserve
- School - Junior High
- Residential - Low Density
- Industrial - Light
- Residential - Medium Density
- Commercial - Neighborhood
- Office
- Parks
- Residential -Agriculture
- Residential - Reserve
- Commercial - Service
- Residential - Very Low Density

Stanislaus County
Airport Land Use Compatibility Plans
 (August 2016 Draft)

Exhibit MOD 9B

Sources: City and County GIS Data (2009)

Ceres General Plan
 Modesto City-County Airport



Legend

- City Boundary
- Existing Runway
- Future Runway Extension
- 60dB CNEL Noise Contour
- 65dB CNEL Noise Contour
- Safety Zones (composite)

City of Modesto General Plan

- Business Park
- Commercial
- Industrial
- Mixed Use
- Open Space
- Residential
- Commercial - Regional
- Redevelopment Planning District
- Salida Community Plan
- Residential - Village



**Stanislaus County
Airport Land Use Compatibility Plans
(August 2016, Draft)**

Exhibit MOD-9A

Sources: City and County GIS Data (2009)

**Modesto General Plan
Modesto City-County Airport**

THE BOARD OF SUPERVISORS OF THE COUNTY OF STANISLAUS
ACTION AGENDA SUMMARY

DEPT: Planning & Community Development
Urgent _____ Routine X
CEO Concurs with Recommendation YES _____ NO _____
(Information Attached)

BOARD AGENDA # *D-1
AGENDA DATE: September 23, 2003
4/5 Vote Required YES _____ NO X

SUBJECT:

APPROVAL OF RULES AND REGULATIONS FOR THE STANISLAUS COUNTY AIRPORT LAND USE COMMISSION

STAFF RECOMMENDATIONS:

APPROVAL OF RULES AND REGULATIONS FOR THE STANISLAUS COUNTY AIRPORT LAND USE COMMISSION

FISCAL IMPACT:

None.

BOARD ACTION AS FOLLOWS:

No. 2003-871

On motion of Supervisor Paul, Seconded by Supervisor Caruso
and approved by the following vote,
Ayes: Supervisors: Paul, Mayfield, Grover, Caruso, and Chairman Simon
Noes: Supervisors: None
Excused or Absent: Supervisors: None
Abstaining: Supervisor: None

- 1) X Approved as recommended
- 2) _____ Denied
- 3) _____ Approved as amended
- 4) _____ Other:

MOTION:

Christine Ferraro
ATTEST: CHRISTINE FERRARO TALLMAN, Clerk

SUBJECT: APPROVAL OF RULES AND REGULATIONS FOR THE STANISLAUS COUNTY AIRPORT
LAND USE COMMISSION

PAGE 2

DISCUSSION: The Stanislaus County Airport Land Use Commission was first established on December 1, 1970, by resolution of the Board of Supervisors. In January 1988, SB 633 (Rogers) required that all airport land use commissions have at least two members with expertise in aviation by way of education, training, business, experience, vocation or avocation. The purpose of an airport land use commission is to safeguard the general welfare of the people living, working and recreating in areas surrounding public airports through the adoption and implementation of a comprehensive land use compatibility plan. Implementation requires review and findings for new development projects to determine consistency with the adopted compatibility plan.

To ensure that meetings of the Stanislaus County Airport Land Use Commission (ALUC) are held, conducted and recorded in an efficient manner, staff prepared draft rules and regulations that were considered by the Commission. These rules and regulations are modeled after those adopted by the Stanislaus County Planning Commission. The rules and regulations identify the 11-member ALUC as the nine-member Planning Commission and two members with aviation experience. The aviation experts are appointed by the Board of Supervisors based on the recommendation of the airport managers for airports that fall under the jurisdiction of the ALUC. The Chair and Vice-Chair are to be elected annually from among the Commission's membership. Meetings are held quarterly, but may be held more frequently as necessary to review local plans and projects or may be cancelled for lack of agenda items. The rules and regulations lay out the general order of business and establish meeting procedures for public hearings and public testimony. For voting purposes, a quorum will consist of six (6) members of the Commission.

The Airport Land Use Commission reviewed the attached draft Rules and Regulations at their regular meeting on August 21, 2003, after a noticed public hearing. No comments were received during the public hearing. The Commission unanimously recommended approval by the Board of Supervisors.

**POLICY
ISSUES:** None.

**STAFFING
IMPACT:** None.

ATTACHMENTS: Exhibit 1: Draft Stanislaus County Airport Land Use Commission Rules and Regulations
Exhibit 2: Airport Land Use Commission Minutes, August 21, 2003

STANISLAUS COUNTY AIRPORT LAND USE COMMISSION
RULES AND REGULATIONS

ARTICLE 1 - FUNCTIONS AND DUTIES

The Stanislaus County Airport Land Use Commission, referred to hereafter as the "Commission," functions pursuant to the California Public Utilities Code Section 21670 (et.seq.). The following articles shall govern all proceedings of the Commission.

ARTICLE 2: MEMBERSHIP, OFFICERS, ORGANIZATION, AND ATTENDANCE

Section 1 - Membership: The Commission shall consist of eleven (11) members appointed by the Board of Supervisors. The membership shall consist of the nine (9) member Planning Commission and two (2) additional members with aviation experience appointed by the Board of Supervisors based on the recommendations of the airport managers of airports designated in the Stanislaus County Airport Land Use Commission Plan.

Section 2 - Term of Office: Commissioners are appointed to four (4) year terms and serve at the pleasure of the Board of Supervisors. A Commissioner may serve up to two (2) consecutive four year terms.

Section 3 - Officers:

- (a) Selection. A Chair and Vice-Chair shall be elected annually from among the Commission's membership at the first meeting of the calendar year.

- (b) Succession. The Vice-Chair shall succeed the Chair if the Chair vacates the office before completion of the term and shall serve the remainder of the unexpired term. A new Vice-Chair shall be elected at the next regular meeting to fill the balance of the Vice-Chair term.
- (c) Chair and Vice-Chair Absent. In the absence of the Chair and Vice-Chair, any member may call the Commission to order, and a Chair pro tem shall be elected from the members present and shall assume the responsibilities of the Chair.
- (d) Consecutive Year. A member shall not serve as Chair for more than one consecutive year or Vice-Chair for more than one consecutive year.
- (e) Chair's Responsibilities. The responsibilities and powers of the Chair shall be as follows:
- (1) Preside at all meetings of the Commission and rule on all questions of order.
 - (2) Call special meetings of the Commission in accordance with legal requirements and the Rules of Procedure.
 - (3) Sign documents on behalf of the Commission.
 - (4) Appoint all subcommittees of the Commission.
 - (5) Direct appropriate action on items raised that are not listed on the Commission agenda.

Section 4 - Vice-Chair Responsibilities: In the absence of the Chair, or when the Chair is disqualified from participation or voting, the Vice-Chair shall assume the responsibilities of the Chair.

Section 5 - Secretary: The Stanislaus County Director of Planning and Community Development or a designated member of the Planning staff, shall function as the Secretary of the Commission. The Secretary shall notify Commission members of meetings, present the reports and recommendations of the Commission's staff, enter into the minutes all official actions or decisions of the Commission, keep the official records of the Commission, transmit the findings of the Commission to the Board of Supervisors, and perform such other duties as the Commission may require.

Section 6 - Advisory Staff: County Counsel, or their designated staff, serve as advisory staff to the Commission.

Section 7 - Standing Committees: The Commission may establish whatever standing committees it deems appropriate for the conduct of its business. The Chair shall appoint and replace the members of each standing committee.

Section 8 - Special Committees: The Commission may establish whatever special committees it deems appropriate for the conduct of its business. The Chair shall appoint and replace the members of each special committee.

Section 9 - Attendance: Any member who misses three consecutive regular meetings without a valid excuse, approved by the Commission, is subject to removal from the Commission by the Board of Supervisors.

ARTICLE 3 - MEETINGS

Section 1 - Conduct of Meetings: Except as herein or otherwise provided, Robert's Rules of Order, Revised shall govern all proceedings of the Commission.

Section 2 - Regular Meetings: The Commission shall hold regular, quarterly meetings. Special meetings may be necessary to address specific land use issues. The meeting shall start at approximately 6:05 p.m. The Commission agenda shall state the location of the meeting. Any regular meeting may be adjourned from time to time.

Section 3 - No meeting on Holidays: Whenever a regular meeting falls on a public holiday, no regular meeting shall be held on that day. Such regular meeting may be rescheduled to another business day, or canceled at the direction of the Chair.

Section 4 - Adjourned Meetings: In the event it is the wish of the Commission to adjourn its regular meeting to a certain hour on a day, other than a regularly scheduled meeting, a specific date, time and place must be set by the Commission prior to the regular motion to adjourn.

Section 5 - Special Meetings: The Chair may call special meetings as necessary, providing that each member of the Commission, and each newspaper, television station, and other news media which so requests in writing, is notified at least twenty-four (24) hours before the meeting.

Section 6 - Study Sessions and Workshops: The Chair may convene the Commission as a whole or as a committee of the whole, for the purpose of holding a study session provided that no official action shall be taken and no quorum shall be required. Such meetings shall be open

to the public; but, unless the Commission invites evidence or comments to be given, participation by interested members of the public shall not take place at such study sessions.

Section 7 - Cancellation of Meetings: The Chair may cancel any regular or special meeting of the Commission if it is determined there is no significant business to be conducted. However, the Commission shall hold at least one (1) meeting each year.

ARTICLE 4 - AGENDAS, ORDER OF BUSINESS

Section 1 - Agendas: An agenda for each meeting of the Commission shall be prepared by the Secretary or assigned staff.

Section 2 - Agenda - Order of Business: Unless the Secretary determines otherwise, the following sequence shall be used in the preparation of agendas:

- I. Roll Call (silent)
- II. Pledge of Allegiance
- III. Minutes of Previous Meeting(s)
- IV. Correspondence - Included in agenda packet and received after packet has been distributed.
- V. Conflict of Interest Declarations
- VI. Public Hearings - Consent Items - Non Consent Items
- VII. Other Matters
- VIII. Citizen's Forum
- IX. Report of the Secretary

- X. Additional Matters at the Discretion of the Chair
- XI. Adjournment

The order of business may be altered at the discretion of the Chair.

Section 3 - Requests for Continuance. If a request is made for continuance, a motion may be made and voted upon to continue the public hearing to a definite time and date or to continue indefinitely. A motion may also be made and voted on to place the item anywhere under the "Public Hearing Items" heading on the agenda. Any person desiring to be heard on the item may be given an opportunity to make a presentation.

Section 4 - Public Hearings - Consent Items: Those applications or items which are determined by the Secretary to be consistent with all regulations and requirements and have not generated any controversy may be placed on the consent item calendar. At the hearing, the Chair shall identify each individual item on this calendar and indicate the Commission's intent to approve all items, with findings noted in the Staff Report, unless a Commissioner or member of the audience wishes a discussion of a particular item. For those items where no one wishes a discussion, a motion to approve is in order. Any item that has been requested for further discussion shall be removed from the consent portion of the calendar and placed on the non-consent portion of the calendar. A full public hearing shall be conducted on the item.

Section 5 - Public Hearings - Non-Consent Items: The Chair shall announce, open, request the Secretary's report and preside over each public hearing conducted by the Commission.

^

Section 6 - Secretary's Report: The Secretary or designated staff shall present a report on each application for which a public hearing is conducted. The report shall include the name and address of the lead agency or applicant, location of the project, any correspondence or other communication concerning the proposal, and any information which the Commission's staff feels is pertinent. The report may include a staff recommendation. The Commission may ask technical questions of staff or advisory staff.

Section 7 - Oral Public Testimony: Upon the completion of the Secretary's report, the Chair shall invite proponents and opponents of the proposal under consideration to address the Commission. The Chair shall recognize speakers and determine the order in which they address the Commission.

Section 8 - Conduct of Speakers: Each speaker shall be required to approach the microphone and give their name and address. The speaker may then proceed to offer information. However, speakers will be limited to the item under consideration and irrelevant and off-the-subject comments may be ruled out of order by the Commission. The Chair will not tolerate any complaints regarding individual Commissioners or the staff or any remarks of a personal nature during a public hearing. All comments shall be addressed to the Commission.

Section 9 - Time Limits for Testimony: In the event that a large number of speakers wish to address the Commission, the Chair may limit the amount of time afforded to each speaker to five (5) minutes. In addition, the Chair may foreclose any testimony which presents evidence which is repetitious, incompetent, irrelevant, immaterial, which constitute offensive or inappropriate language or remarks of a personal nature.

Section 10 - Written Testimony: The Commission's policy is to encourage the early submission of all written material to allow sufficient time to comprehend the material. In order to be included in the Commissioner's agenda packet, written material should be presented to the Planning and Community Development Department not later than ten (10) days prior to the scheduled Commission meeting. Written material received after the agenda has been mailed to the Commission may be presented to them at the scheduled meeting by the Secretary.

Section 11 - Documentary Evidence: Any documents, writings, pictures, exhibits, video tapes or other forms of tangible expression once submitted to the Commission shall become the property of the Commission and part of the public record.

Section 12 - Closing of Public Hearing: The Chair shall close the public hearing when it is determined that all solicited testimony has been received. Subsequently, at the discretion of the Chair, comments may be made by persons in the audience if any matter not previously discussed is introduced into the hearing or if clarification is necessary.

Section 13 - Discussion and Decision by the Commission: After the public hearing has been closed, the members of the Commission shall discuss the evidence presented and reach a decision on the proposal under consideration. The proposal may be continued to a future meeting if the Commission determines that additional information is required or additional time is necessary to consider oral and written testimony.

Section 14 - Voting Requirements:

- (1) A quorum shall consist of six (6) members. In the absence of a quorum, the members present shall constitute a committee of the Commission and shall make a report of their action at the next succeeding meeting at which a quorum is present. The actions of the committee shall become effective when ratified by the members of the Commission at such succeeding meeting.
- (2) A majority vote is required for the Commission to take action unless otherwise required by state law.
- (3) In the case of a tie vote or where less than a majority vote is cast on a motion, the motion fails and a new motion is in order. If an alternative action is not possible, the proposal shall be considered denied.
- (4) Commissioners shall not vote on a motion unless they have been present during the entire hearing on the issue or have listened to the tape recording of that portion of the hearing presented in their absence.
- (5) When a member of the Commission abstains from voting on any matter before it because of a potential conflict of interest, said abstention shall not constitute nor be considered as either a vote in favor of or opposition to the matter being considered.

Section 15 - Disqualification from Voting: Commissioners shall disqualify themselves from voting in accordance with the Stanislaus County Airport Land Use Commission Conflict of Interest Code and all applicable laws and regulations. When Commissioners disqualify themselves, they shall state prior to the consideration of such matter by the Commission that they are disqualifying themselves due to a possible conflict of interest and shall then step down from the dais.

Section 16 - Prohibition of New Items After 11:00 p.m. No new item will be started after 11:00 p.m. or discussed after 12:30 a.m. unless the rule is suspended by a majority of the Commission present.

Section 17 - Records of Meetings: Commission public hearings shall be recorded by mechanical means. When a request is made in writing for a stenographic record of a public hearing, the record shall be prepared and made available to the requesting party at cost. An advance deposit in the amount necessary for duplication will be required from the requesting party.

I:\WHITMORE\ALUC\Administration\Rules & Regs\rul-reg draft.wpd

- *A. **AIRPORT LAND USE COMMISSION RULES AND REGULATIONS**
Staff report: Ron E. Freitas, Director of Planning and Community Development ,
Recommends **APPROVAL TO THE BOARD OF SUPERVISORS.**
Public hearing opened.
OPPOSITION: No one spoke.
FAVOR: No one spoke.
Public hearing closed.
A. Souza/R. Souza, Unanimous (7-0), **RECOMMEND APPROVAL TO THE BOARD
OF SUPERVISORS.**

<p style="text-align: center;">EXCERPT</p> <p style="text-align: center;">AIRPORT LAND USE</p> <p style="text-align: center;">COMMISSION</p> <p style="text-align: center;">MINUTES</p> <p style="text-align: center;"></p> <hr/> <p style="text-align: center;">Secretary, Airport Land Use Commission</p> <p style="text-align: center;"></p> <hr/> <p style="text-align: center;">Date</p>

Exhibit D – Final Environmental Impact Report – Stanislaus County General Plan and Airport Land Use Compatibility Plan Updates***

Copies of the Final Environmental Impact Report - Stanislaus County General Plan and Airport Land Use Compatibility Plan Updates are available for review at the County Planning Department Office, or on the County's Website at: <http://www.stancounty.com/planning/agenda-aluc/index.shtm>

***Hard copies of Exhibit D have been provided to each member of the Airport Land Use Commission as part of the October 6, 2016, Airport Land Use Commission Agenda packet.

Exhibit D consists of the following three separate documents:

- Part 1 – Final Environmental Impact Report**
- Part 2 – Draft Environmental Impact Report**
- Part 3 – Appendices**



133 Aviation Boulevard, Suite 100
 Santa Rosa, California 95403
 707-526-5010
 meadhunt.com

August 31, 2016

Sent via email

Mr. Tom Westbrook, Director
 Community Development
 Planning and Building Division
 City of Ceres 2220 Magnolia Street
 Ceres, California 95307

Subject: Stanislaus County Airport Land Use Compatibility Plan Review Responses

Mr. Westbrook:

Thank you for your comments letter of May 26, 2016, regarding Stanislaus County's proposed Airport Land Use Compatibility Plan (ALUCP) Update. The following letter summarizes the County's responses to your comments.

Proposed Residential Development – Policies 3.3.2 and 3.3.4.

The City of Ceres (City) commented that the proposed density limits for residential uses are much more restrictive than the current ALUCP. The City also requested that the County provide a table or chart to identify undeveloped parcels available for development in the City and the level of residential development that would be allowed under the proposed ALUCP update.

The table below compares the residential units by safety zone between the adopted and proposed ALUCP.

Table 1. Residential Density by Safety Zone – City of Ceres			
Zone	Adopted ALUCP (2004)	Proposed ALUCP Update	Discussion
Zone 1	None	None	No change. Consistent with Caltrans Handbook, 2011.
Zone 2	0.1 unit/acre (1 d.u./10 acres)	Density of 1 dwelling unit per 10 acres (0.1 dwelling unit per acre) and the dwelling unit site shall be situated outside of the safety zone where feasible.	Caltrans Handbook recommends an average of 1 unit per 10 to 20 acres or no dwellings for urban or dense/urban environments. Policy will be revised as noted.
Zone 3	2.0 units/acre (1.0 d.u./0.5 acre)	0.2 unit/acre (1.0 du/5.0 acres)	Caltrans handbook recommends 1 unit per 2 to 5 acres in suburban environments or less to comply with current zoning, but allows infill in urban areas.
Zone 4	0.4 unit/acre (1 du/2.5 acres)	0.2 unit/acre (1.0 du/5.0 acres)	Caltrans handbook recommends 1 unit per 2 to 5 acres in suburban environments or less to comply with current zoning, but allows infill in urban areas.
Zone 5	0.5 unit/acre (1 du/0.5 acre)	0	Not applicable. No developable property occurs in zone 5.
Zone 6	No limit	No limit	No change.

As shown in Table 1, the residential densities proposed in Zones 3 and 4 are more restrictive in the proposed ALUCP compared to the 2004 ALUCP as it relates to the City of Ceres. However, both proposed densities are consistent with the criteria set forth in the latest edition of the *Caltrans Handbook*. In addition, the proposed ALUCP provides for the development of infill, which is addressed by ALUCP Policy 4.1.2, Infill.

The County performed a detailed displacement analysis to identify potential conflicts between the City's General Plan land use map and the proposed ALUCP criteria. The difference between the number of units permitted by the City's General Plan and the number of units allowed under the proposed ALUCP indicated a theoretic displacement of up to 338 housing units. However, the City's 2009 Housing Element included a thorough inventory of available land that was designated for residential development in the City and its Sphere of Influence to fulfill its Regional Housing Needs Allocation. According to the map, only four parcels designated for residential housing (V1, V2, V3, and V42) were located in the Airport Influence Area (AIA) for the Modesto City-County Airport, leading to a potential true displacement of 32 units. (A copy of EIR Figure LU-6 is attached for reference.)

The City requested that the County provide a table or chart to identify undeveloped parcels available for development in the City and the level of residential development that would be allowed under the proposed ALUCP update. Providing such a table has the potential to be misleading because it would not take into account existing development without a detailed parcel-by-parcel analysis, and it would not reflect opportunities for infill development or other site-specific conditions. ALUCP Policy 3.3.2 and Table 2 identify the allowable residential development for the parcels identified in the City's Housing Unit and other vacant parcels in the AIA.

ALUCP Exhibits 1 and 2

The City requests that similar exhibits be created to illustrate intensity calculations and site splits for residential development by safety zone.

A separate exhibit is not provided because the development of multiple dwellings on parcels containing multiple safety zones is described in Policy 3.3.9, Limits on Clustering. To provide clarification regarding residential development, a note will be added to Exhibit 2 that refers to Policy 3.3.9.

Establishment of Review Processes: Local Agencies

Policy 4.3.3 discusses the process by which the ALUC Staff will respond to projects submitted by local agencies. The City agrees that submission to the ALUC Staff for all projects included in Referral Area 1 is appropriate. However, we feel that submitting projects proposed within Referral Area 2 is not needed as Referral Area 2 is outside of the Airport Safety Zones and should have a negligible impact to the Airport and its operations. The City is requesting an insertion of language in Policy 4.3.3 that suggests the reviewing of development projects proposed within Referral Area 2 is not required. Alternatively, then listing the type of projects within Referral Area to that do not need to be routed to the ALUC staff for review and comment is recommended.

Policy 4.3.3 refers to the process that local agencies must define and follow when reviewing proposed land use changes within the Airport Influence Area, regardless of referral area. As described in Section 4.3.3 (b), a local agency has three options: it may define and implement a process for reviewing proposed changes, adopt the ALUCP by reference, or indicate that all or specific list of actions should be submitted to the ALUC for review.

Policy 4.3.3 must be considered in relation to ALUCP Section 1.5, Types of Actions Subject to ALUC Review. Once the ALUC finds that a local agency's general plan or specific plan is consistent with the ALUCP, referral will continue to be mandatory only for actions involving general plans, specific plans, zoning ordinances, and building codes. The ALUC will no longer have authority under state law to require that all actions, regulations, and permits be referred to the ALUC for review. However, the ALUC and Local Agency can agree that the ALUC should continue to receive, review and comment on individual projects/land use actions. Section 1.5.4 "Major Land Use Actions" lists the types of projects for which ALUC review is recommended or may be warranted. In terms of proposed actions in Referral Area 2, only the actions listed in Policy 1.5.4, paragraphs (a)(10) through (a)(13) require referral to the ALUC for review.

The following text will be added to Policy 4.3.3 to clarify the occasions the conditions or projects that would warrant ALUC review:

Local agencies must refer all proposed actions identified in Policy 1.5.4, Major Land Use Actions, to the ALUC for review until such time that the ALUC finds that the agency's general plan or specific plan is consistent with the ALUCP or local agency has overruled an ALUC determination of inconsistency regarding the general plan or specific plan.

Page Numbering

As the City points out, the page number at the end of section 2 is incorrect. Table 2 will be begin on page no. 2-51.

Other Considerations: Safety Zone 3 for the Modesto City-County Airport

Following the City's comment regarding residential development, the County reviewed the location of Safety Zone 3 and its relationship to air traffic patterns at the Modesto City-County Airport. Based on a review of runway use, it was determined that the configuration of Zone 3 associated with Runway 10L-28R could be revised to encompass a smaller area south of the approach end of Runway 28R. This change is consistent with Caltrans guidance associated a runway with a single-sided traffic pattern (see revised figure Map Mod-3). As a result of this change, a smaller portion of the City would be included in Safety Zone 3.

The ALUC acknowledges that the City of Ceres has taken care to include an airport overlay in its General Plan update, and the development of Safety Zones used to identify residential / nonresidential development standards are similar to those identified in the proposed ALUCP update. The proposed update was developed using the revised criteria set forth in the *California Airport Land Use Planning Handbook*, which was last revised by Caltrans in 2011, and the Airport Layout Plan for the Modesto City-County Airport. The proposed ALUCP update includes greater precision in the identification of parcels within identified safety zones and alternatives for calculating the site-wide and single-acre usage intensities on such parcels.

Mr. Tom Westbrook
August 31, 2016
Page 4 of 4

Thank you for your thorough review of the proposed ALUCP. We will make the changes identified above to further clarify ALUC policies and procedures. If our response to your comments is unclear, please do not hesitate to call or email me. I would like to set up a meeting or teleconference with you prior to September 15, 2016, to go over any outstanding questions you may have.

Sincerely,

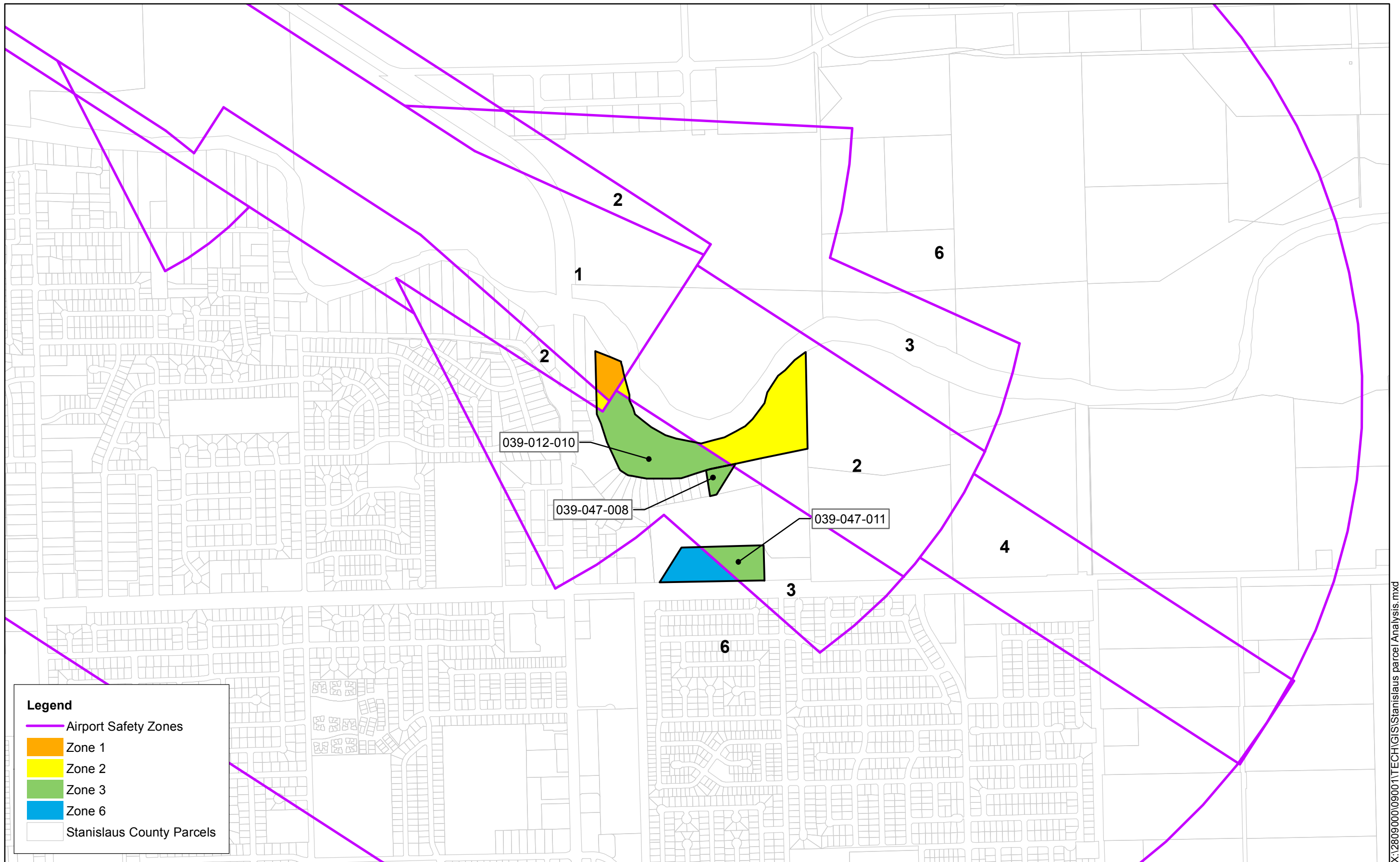
MEAD & HUNT, Inc.



Lisa Harmon
Senior Aviation Planner

Attachments: Figure 1. Parcel and Safety Zone Locations
Figure 2. Parcel and Safety Zone Locations with Zoning

cc: Kristin Doud



Legend

- Airport Safety Zones
- Zone 1
- Zone 2
- Zone 3
- Zone 6
- Stanislaus County Parcels

Source: Stanislaus County

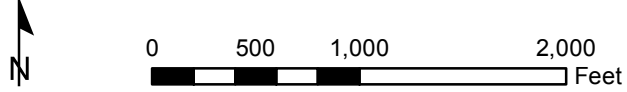
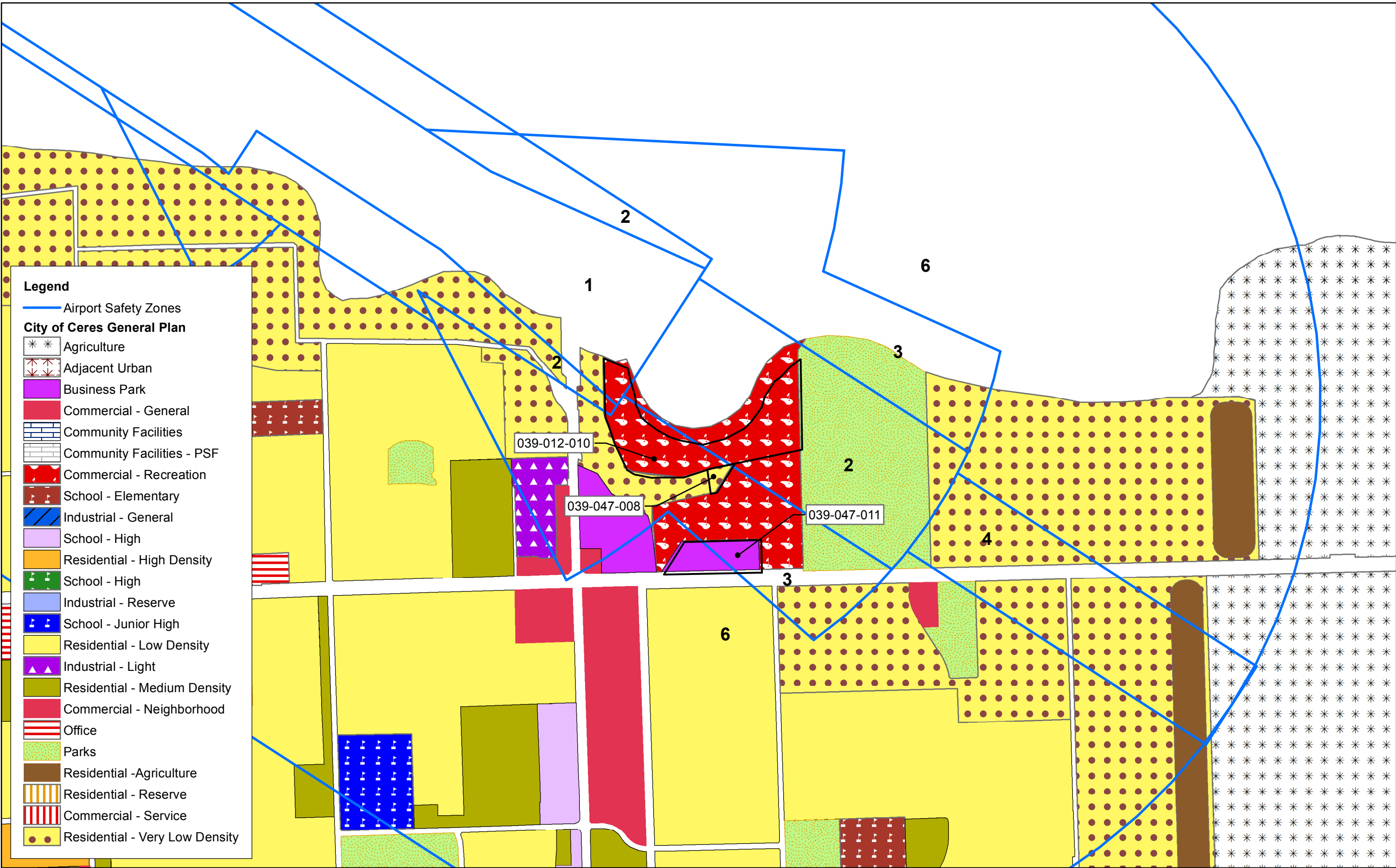


Figure 1. Parcel and Safety Zone Locations

X:\2809000\090001\TECH\GIS\Stanislaus parcel\Analysis.mxd



Source: Stanislaus County; Ceres

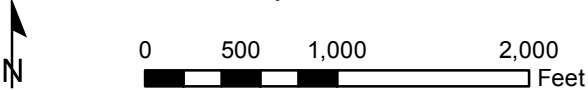


Figure 2. Parcel and Safety Zone Locations with Zoning

X:\2809000\09001\TECH\GIS\Stanislaus parcel\Analysis\Zoning.mxd



133 Aviation Boulevard, Suite 100
Santa Rosa, California 95403
707-526-5010
meadhunt.com

August 31, 2016

Sent via email

Mr. Robert Fiore
Associate Transportation Planner
Caltrans, Division Aeronautics
1120 N Street
Sacramento, CA 95814

Robert.fiore@dot.ca.gov

Subject: Stanislaus County Airport Land Use Compatibility Plan Review Responses

Mr. Fiore:

Mead & Hunt and the County of Stanislaus thank you for your comment letter of June 8, 2016, and your careful consideration of the Draft *Stanislaus County Airport Land Use Compatibility Plan (ALUCP)*, which addresses the Modesto City-County Airport and the Oakdale Municipal Airport.

The County has considered the comments provided in your letter and offers a response to each comment. *Caltrans comments are numbered and presented as italicized text.* Based on the comments received from you, we have modified certain draft ALUCP policies. Proposed changes to draft policies are either underscored to show where additional language has been added, or ~~struck out~~ to indicate where text has been removed.

Comment 1: *The ALUCP could be expanded to present and demonstrate the far-reaching economic importance of the airport, the critical emergency service role and the ease of interstate and intrastate travel. Then policies affecting the airport can cite the discussion on this matter to support the policy.*

Response 1: Both the Modesto City-County Airport and the Oakdale Municipal Airport support emergency service, intrastate and interstate travel, and provide positive economic effects for their communities and the state as a whole. However, the inclusion of a discussion of the roles and economic impact for each airport is not required by statute, and would have no effect on the proposed ALUCP policies. The discussion will not be included at this time.

Comment 2: *Section 1.1.1 discusses the membership composition of the ALUC, and PUC Section 21670(b)(4) outlines the specific composition of members. The ALUCP should include a description of the ALUC membership and how it complies with PUC Section 21670(b)(4). Further, a copy of the ALUC formation document included in the appendices would be appropriate for reference.*

Response 2: The Airport Land Use Commission (ALUC) for Stanislaus County is a designated body consisting of the County Planning Commission and additional members with expertise in aviation. Section

1.1.1 of the ALUCP will be amended as follows, and a copy of the ALUC Rules and Regulations will be provided as Appendix I (see attached document).

Section 1.1.1 Airport Land Use Commission: The Stanislaus County Planning Commission was appointed as a designated body to act as the Stanislaus County Airport Land Use Commission (ALUC) on December 1, 1970, by the City-County Committee and the Board of Supervisors in accordance to PUC Section 21670.1. The nine-member Planning Commission, which includes representatives from all five County districts, is augmented by two additional members with aviation expertise when acting in the capacity of the Airport Land Use Commission. (Stanislaus County ALUC Rules and Regulations are presented as Appendix I.) Stanislaus County Airport Land Use Commission is formed and operates in accordance with the requirements of California State law. The Stanislaus County Planning Commission plus two additional members with aviation expertise comprise the ALUC which is designated to serve Stanislaus County.

Comment 3: *Section 1.4.3 discusses existing land use and its applicability to the airport land use compatibility process. The definition provided in the ALUCP does not mirror the policy in the Handbook. The Handbook's discussion of existing uses should not be considered as a policy, but as a resource to develop policy. It is within the authority of the ALUC to develop policy that represents the intent of the State Aeronautics Act and the Handbook.*

Response 3: Chapter 2, Section 1.4.3, provides a definition of existing conditions that was developed using the California Airport Land Use Planning Handbook and input from County staff. The definition reflects the authority and processes implemented by the jurisdictions within each airport's Airport Influence Area (AIA) pertaining to existing land uses and local discretionary review processes. No change to the text in Section 1.4 is warranted.

Comment 4: *ALUCP Chapter 2, Section 1.6 describes the overrule process and procedures. The ALUCP should spell out the review processes and procedures in more detail with respect to scheduling, number of hearings, noticing requirements and adoption of approval of carrying votes. The ALUCP review process should be consistent with the practices of the local government within Stanislaus County.*

Response 4: Chapter 1, Introduction (page 1-8), discusses the process that is available to local agencies to overrule an ALUCP, and the procedural requirements associated with that process (number of votes required, findings, review period for ALUC and Caltrans, etc.). The policies set forth in Chapter 2, Section 1.6, address what the ALUC would need to do in the event of an overrule. The detailed description of the ALUCP review process that the Division is asking for with respect to scheduling, number of hearings, and noticing requirements would vary according to the jurisdiction requesting the overrule. No revision to Section 1.6 is proposed.

Comment 5: *ALUCP policy 2.1.2(b) and similar ALUCP policies establish the ALUCP secretary as the person responsible for making consistency determinations. The PUC does not provide for alternative review processes. When a general or specific plan or local planning action is submitted to an ALUC, it must be reviewed by the ALUC.*

Response 5: Chapter 2, Policy 1.5 provides a detailed description of the types of actions subject to ALUC review by statute. Policy 1.5.1 identifies the land use actions for which referral is always mandatory, which includes local agency adoption or approval of any new general plan, specific plan, or amendment that affects lands within the Airport Influence Area (AIA).

The ALUC concurs that consistency determinations on actions for which submittal to the ALUC is mandatory—general plans, specific plans, zoning ordinances—must be made by the ALUC itself and not be delegated to the ALUC Secretary. However, we disagree with regard to actions which the law does not require be submitted. Even prior to the time when a general plan has been made consistent with the ALUCP, PUC Section 21676.5(a) only states that “the commission **may** require the local agency to submit all subsequent actions....” (emphasis added). Further, after a general plan has been made consistent, Section 21676.5(b) indicates that the ALUC can no longer require referral of actions. Under these circumstances, we see nothing in the statutes that prevents the ALUC from delegating these reviews to its Secretary. Note as well, that the ALUCP limits the Secretary to finding a project consistent with the ALUCP. If the Secretary finds the project is not consistent or has doubt about the consistency, the action must be forwarded to the ALUC for determination. No change to the document text is warranted.

Comment 6: *Table 2 shows that children’s schools, nursing homes, hospitals, and daycare centers are compatible or conditionally compatible in Safety Zone 6, except that school sites are prohibited within 0.5 mile of an airport. The Handbook does not specifically prohibit these uses, but states that the uses should be “limited” within the Traffic Pattern Zone (TPZ). It may be in the ALUC’s best interest to consider the prohibition of schools in the TPZ unless there is no other available site outside of the safety zone, or it could designate sites within the TPZ that may be appropriate and the basis for identifying these sites within the TPZ.*

Response 6: The County concurs with the comment. Table 2 will be amended as follows:
Children’s schools will not be allowed in Safety Zone 6 unless there are no other available/feasible sites outside of the safety zone.

Comment 7: *Background information for O27 cites a left turning pattern as the basis for the angling of Safety Zone for in a westerly direction instead of northwesterly consistent with the generic safety zones found in the Handbook. According to the Division’s aviation safety officers, though a majority of aircraft take a left turn pattern, many take a straight out pattern. If there are other reasons for modifying the safety zone, please include such reasons in the discussion or modify the safety zone to include that are that would be part of Safety Zone 4 as illustrated in the Handbook.*

Response 7: As described in Chapter 5, approximately 60% of the flights at the Oakdale Municipal Airport (O27) operate using a left traffic pattern, and approximately 40% operate using a straight-out pattern. Safety Zone 4 was created by adjusting the generic patterns shown in the *Handbook* to accommodate both a straight-out pattern and a left turn pattern.

Exhibit OAK-9A, which illustrates the Safety Zones identified for O27 overlaid upon the General Plan land use map, shows the location of Safety Zone 4 as extending westward to S. Stearns Road and northward to Sierra Road. Exhibit OAK-6 illustrates the generic zones provided by the *Handbook*. A comparison of

Mr. Robert Fiore
August 31, 2016
Page 4 of 4

the exhibits indicates that Safety Zone 4 encompasses a greater area than the area identified by the generic safety zones shown in the *Handbook*. The greater area accommodates the predominant left traffic pattern while encompassing nearly all of the area identified by the straight-out pattern. Safety Zone 4, as described in the *Handbook*, would include only a portion of the parcel southeast of the intersection of Sierra Road and S. Stearns Road, whereas the ALUCP encompasses the whole of the parcel.

We acknowledge that the generic pattern includes 2.7 acres of a large parcel located northeast of the intersection of Sierra and S. Stearns roads, which is not included in ALUCP Safety Zone 4. This 2.7-acre area was not included in order to provide a more easily defined boundary based on nearby geographic features and the predominance of the left pattern.

Stanislaus County appreciates the Division's careful review of the proposed ALUCP during the EIR public-review period, and we have considered each comment carefully. Please contact me by telephone (916 993 4650) or email (lisa.harmon@meadhunt.com) should you have any questions on our responses to your comments.

Sincerely,

MEAD & HUNT, Inc.



Lisa Harmon
Aviation Planner

cc: Kristin Doud, Associate Planner, Stanislaus County



133 Aviation Boulevard, Suite 100
 Santa Rosa, California 95403
 707-526-5010
 meadhunt.com

August 31, 2016

Sent via email

Mr. Ryan Thornberry
 River Oaks Golf Course
 3441 Golf Links Road.
 Ceres, California 95307

Email: ryan@californialandscapesupply.com

Subject: Stanislaus County Airport Land Use Compatibility Plan (ALUCP)

Mr. Thornberry:

Thank you for your email message regarding the proposed *Stanislaus County Airport Land Use Compatibility Plan (ALUCP) update*. Mead & Hunt, Inc. has reviewed the potential effect of the ALUCP update on your parcels as requested by the County of Stanislaus in response to your email message.

The River Oaks Golf Course is an existing use located in the Airport Influence Area (AIA) for the Modesto City-County Airport, which is available to provide commercial air service. The proposed ALUCP update would have no effect on existing golf course facilities. As expressed in current statutes, the purpose of an ALUC is “to protect health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses” (California Public Utilities Code Section 21670 *et seq.*). The common interpretation of this clause is that ALUCs have no jurisdiction over existing land uses, even if they are incompatible with airport activities.

Parcel Use and Airport Safety Zones

The current ALUCP shows that the three parcels you identified in your email (APN numbers 039-047-008, 039-047-011, and 039-012-010) would remain within the AIA for the Modesto City-County Airport following the proposed ALUCP update. However, the safety zones in which they are located would shift slightly to reflect changes in the Airport Master Plan since the last ALUCP update in 2004, as summarized in the following table and shown on the attached figures:

APN and Size	Safety Zone/ Acreage Adopted ALUCP	Safety Zone/ Acreage Proposed ALUCP
39-047-008 (7.5 acres)	Zone 3: 1.9 acres	Zone 3 - 3.6 acres
	Zone 6: 5.6 acres	Zone 6 – 3.9 acres
39-047-011 (1.1 acres)	Zone 2: 1.1 acres	Zone 2: 1.1 acres (No change anticipated)
39-120-010 (27.6 acres)	Zone 1: 0	Zone 1: 2.3 acres
	Zone 2: 9.1 acres	Zone 2: 12.9 acres
	Zone 3: 18.5 acres	Zone 3: 12.4 acres

As shown on the table, no change is anticipated for APN 39-047-011 in terms of its location within a safety zone.

APN 39-047-008.

As shown in the table, a greater portion of this parcel (1.7 acres) would be included in Safety Zone 3 following the ALUCP update.

According to the City of Cere's General Plan, this parcel is located in an area that is designated for business park use. The City's definition of business park use provides for limited industrial uses, office centers, research and development facilities, medical and institutional uses, warehousing and distributing, "back-office" uses, other similar uses. Incidental employee-serving retail/service, and ancillary on-site retail may also be permitted.

As previously stated, the proposed ALUCP update would not affect the current land use. The development of new uses identified in the City's General Plan would remain consistent or conditionally consistent in Zones 2 or 3 according to the proposed ALUCP update. The only exception would be the development of new in-patient care facilities/institutions, which would be prohibited by the proposed ALUCP.

The only restriction identified for new uses in Zone 6 would be associated with the intensity of new uses. However, the maximum site-wide average intensity of 60 people/acre in Zone 3 and 300 people/acre in Zone 6 identified in the proposed ALUCP are less restrictive than those in the current ALUCP (40 people/acre in Zone 3 and 150 persons/acre in Zone 6).

New development in the portion of the parcel within Safety Zone 3 would be conditionally consistent with the proposed ALUCP update as discussed in Policy 3.3.3 of the ALUCP and summarized in Table 2. For example, the portion of the site dedicated to retail uses, including eating/drinking areas, and the intensity of use for buildings greater than three stories and within 1/2 mile of the runway could be restricted based on their location.

ALUCP policy 3.3.11 addresses parcels lying within two or more safety zones, and the policy considers any parcel that is split by safety zone boundaries as multiple parcels divided at the safety zone boundary line. Site plans for a parcel encompassing multiple safety zones may be developed to transfer the allowed density / intensity from the more restrictive portion to the less restricted portion of the site.

The proposed ALUCP would not prevent the future development of this parcel for the uses identified in the City's current General Plan, with the exception of medical/institutional uses, but all uses would be required to adhere to the use intensities identified in the proposed ALUCP update.

APN 39-120-010

As shown on the table, this 27-acre parcel is currently located in Safety Zones 2 and 3, but the revised ALUCP indicates that the approximately 2.3 acres of the parcel would be within Zone 1 following the

proposed ALUCP update, and the remaining acreage would be almost evenly divided between Zones 2 and 3. Safety Zone 1 encompasses the Runway Protection Zone. The adopted ALUCP, which was amended in 2004, reflects a non-precision approach for Runway 10-28R. The current ALP reflects a precision approach as shown in the current ALP, and a larger Runway Protection Zone.

The 27-acre parcel is currently designated by the City's General Plan for commercial recreation, which provides for publicly and privately-operated recreational uses, including golf courses, arcades, miniature golf courses, amusement parks, and sports complexes. Supporting and accessory uses, such as single and multi-family dwellings, clubhouses, restaurants, specialty retail sales, and hotels and motels, require discretionary approval.

The site is currently used for a golf course, which is a permitted use under the City's General Plan. A comparison of the permitted General Plan uses and the proposed ALUCP indicates:

- Although the proposed ALUCP would not consider the golf course to be a consistent use in Safety Zone 1, the ALUC has no authority over existing land uses.
- Small non-group recreation, such as golf courses and tennis courts, are conditionally consistent uses in Zone 2 and consistent uses in Zone 3.
- Group recreation, (athletic fields, water recreation, and picnic areas) would be considered incompatible uses in Zones 1 and 2, and conditionally consistent uses in Zone 3.
- Major outdoor assembly facilities, such as spectator stadiums, amphitheaters, fairgrounds, zoos, as well as indoor arenas would be inconsistent with the proposed ALUCP.
- Some single-family dwellings at a density of 1 unit/5 acres would be considered consistent uses in Zones 2 and 3, but multi-family residential uses would be considered inconsistent.
- Short-term lodging (hotels/motels) would be a conditionally consistent use in Zone 3.
- Other supporting and accessory uses could be conditionally consistent or consistent uses in Zone 2 or 3 based on their size and location.

With the exception of multi-family residential development, and the construction of major assembly facilities ($\geq 1,000$ persons), most uses identified in the City's General Plan would be conditionally consistent or consistent with the proposed ALUCP outside of Zone 1. As previously mentioned, the ALUCP provides policies for the development of parcels spanning multiple safety zones that can optimize parcel uses based on site planning and the location of structures, parking areas, open space, etc.

The ALUC acknowledges that the City of Ceres has taken care to include an airport overlay in its General Plan, and the development of Safety Zones used to identify residential / nonresidential development standards in the General Plan are similar to those identified in the proposed ALUCP update. The proposed update was developed using the revised criteria set forth in *the California Airport Land Use Planning Handbook*, which was last revised in 2011, and a more recent version of the Airport Layout Plan for the Modesto City-County Airport. The proposed ALUCP update includes greater precision in the identification of parcels within identified safety zones and alternatives for calculating the site-wide and single-acre usage intensities on such parcels.

Mr. Thornsbury
August 31, 2016
Page 4 of 4

Please do not hesitate to contact me if you have questions regarding the proposed ALUCP update and the location of your property within the AIA for the Modesto City-County Airport. Working together, we can enhance safety for citizens and air travelers.

Sincerely,

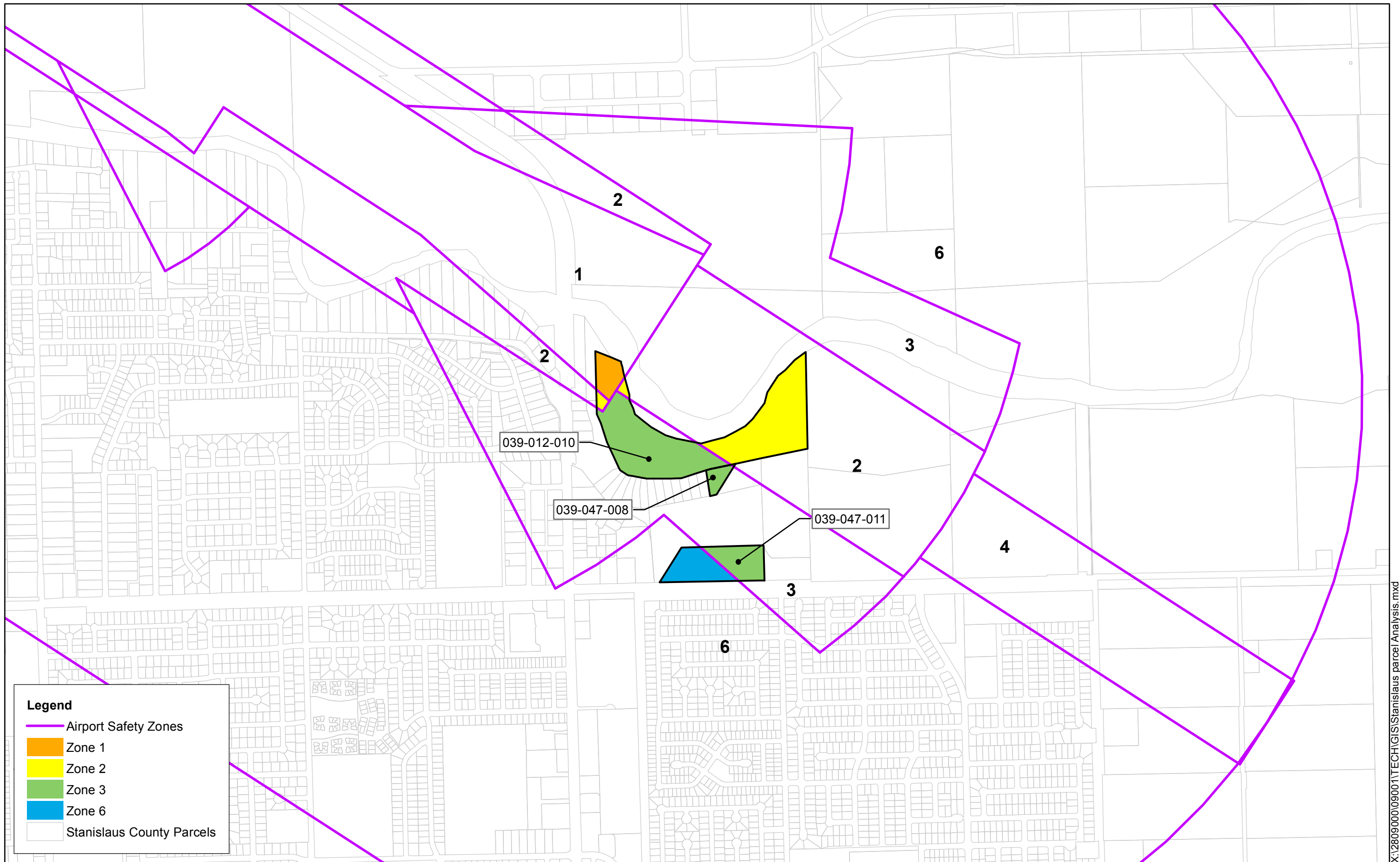
MEAD & HUNT, Inc.



Lisa Harmon
Senior Aviation Planner

Attachments: Figure 1. Parcel and Safety Zone Locations
Figure 2. Parcel and Safety Zone Locations with Zoning

cc: Kristin Doud, Associate Planner, County of Stanislaus



Legend

- Airport Safety Zones
- Zone 1
- Zone 2
- Zone 3
- Zone 6
- Stanislaus County Parcels

Source: Stanislaus County

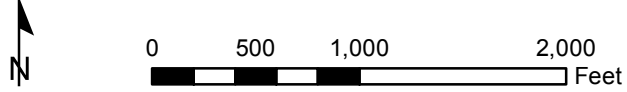
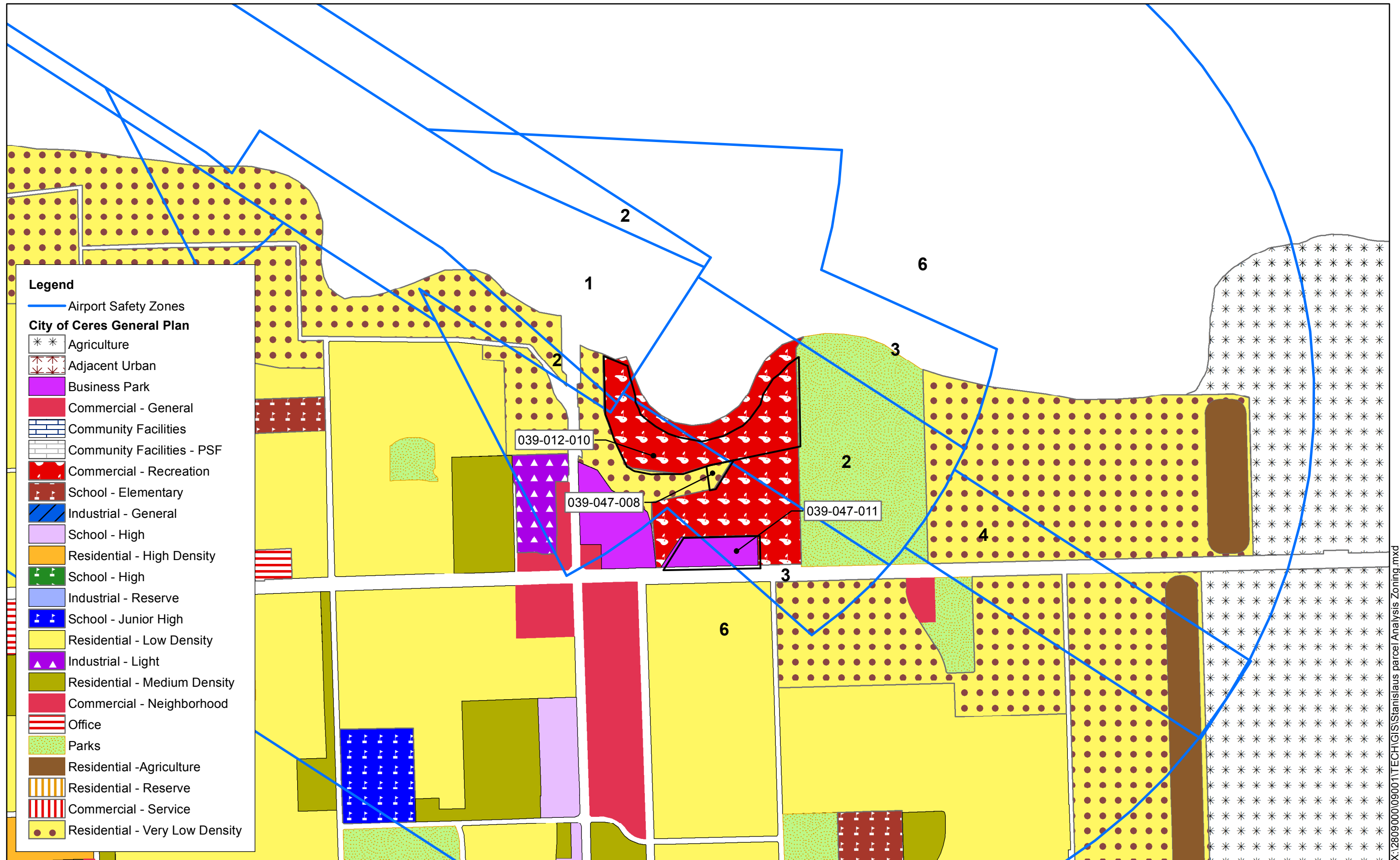


Figure 1. Parcel and Safety Zone Locations

X:\2809000\090001\TECH\GIS\Stanislaus parcel\Analysis.mxd



Source: Stanislaus County; Ceres

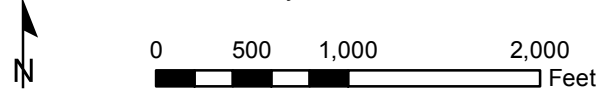


Figure 2. Parcel and Safety Zone Locations with Zoning

X:\2809000\09001\TECH\GIS\Stanislaus parcel\Analysis\Zoning.mxd

ENVIRONMENTAL REVIEW REFERRALS

ADVANCED DESIGN GROUP
ADVISORY BOARD ON SUBSTANCE ABUSE PROGRAMS
AFFORDABLE HOUSING DEVELOPMENT CORPORATION (AHDC)
AIRPORT LAND USE COMMISSION
AIRPORT NEIGHBORHOOD COLLABORATIVE
ALAMEDA COUNTY PLANNING
AMERICAN RED CROSS
ANIL VERMA ASSOCIATES, INC.
ASPEN ENVIRONMENTAL GROUP
ASPEN SURVEY
ASSOCIATED ENGINEERING
AT&T
ATKINS
BENCHMARK ENGINEERING
BUILDING INDUSTRY ASSOCIATION OF THE GREATER VALLEY
BURBANK-PARADISE FIRE DIST
BURLINGTON NORTHERN / SANTA FE RAILROAD
CA COALITION FOR RURAL HOUSING
CA DEPT OF CONSERVATION, DIVISION OF LAND RESOURCE
CA DEPT OF CONSERVATION, GEOLOGICAL SURVEY LIBRARY
CA DEPT OF CONSERVATION, OFFICE OF MINE RECLAMATION
CA DEPT OF FISH AND WILDLIFE
CA DEPT OF FORESTRY
CA DEPT OF FORESTRY, DEL PUERTO OFFICE
CA DEPT OF HOUSING & COMMUNITY DEVELOPMENT
CA DEPT OF RESOURCES RECYCLING AND RECOVERY (CALRECYCLE)
CA DEPT OF TRANSPORTATION, DIST 10
CA DEPT OF TRANSPORTATION, DIVISION OF AERONAUTICS
CA DEPT OF WATER RESOURCES
CA NORTHERN RAILROAD
CA OPR STATE CLEARINGHOUSE
CA RECLAMATION BOARD
CA REGIONAL WATER QUALITY CONTROL BOARD, CENTRAL VALLEY REGION
CA RURAL LEGAL ASSISTANCE
CA STATE LANDS COMMISSION
CALAVERAS COUNTY PLANNING
CENTER FOR HUMAN SERVICES
CENTRAL CA INFORMATION CENTER
CENTRAL CA IRRIGATION DISTRICT
CENTRAL VALLEY FLOOD PROTECTION BOARD
CENTRAL VALLEY OPPORTUNITY CENTER
CERES CHAMBER OF COMMERCE
CERES COMMUNITY COLLABORATIVE
CERES FIRE PROTECTION DISTRICT
CERES UNIFIED SCHOOL DISTRICT
CHATOM UNION SCHOOL DISTRICT

ENVIRONMENTAL REVIEW REFERRALS

CITY OF CERES, PLANNING, CITY CLERK, CITY MANAGER, ECONOMIC DEVELOPMENT
CITY OF ESCALON PLANNING
CITY OF HUGHSON PLANNING
CITY OF MODESTO, PLANNING, CITY CLERK, CITY MANAGER
CITY OF NEWMAN PLANNING, CITY CLERK, CITY MANAGER
CITY OF OAKDALE PLANNING, CITY CLERK, CITY MANAGER
CITY OF PATTERSON PLANNING, CITY CLERK, CITY MANAGER
CITY OF RIVERBANK PLANNING, CITY CLERK, CITY MANAGER, HOUSING DEPARTMENT
CITY OF TURLOCK, PLANNING, CITY CLERK, CITY MANAGER, HOUSING PROGRAM SERVICES, MUNICIPAL SERVICES
CITY OF WATERFORD, PLANNING, PUBLIC WORKS
COMMANDING GENERAL, MCI-WEST MCB CAMPEN
COUNTY FACILITIES CONSTRUCTION DIVISION, CORRECTIONS STANDARDS AUTHORITY
CROWS LANDING COMMUNITY SERVICES AREA
DAVE ROMANO
DEL PUERTO HOSPITAL DISTRICT
DEL PUERTO WATER DISTRICT
DEL RIO HOMEOWNER'S ASSOCIATION, C/O THE MANAGEMENT ALTERNATIVE
DEL RIO PROPERTY OWNERS ASSOC
DELAMARE-FULTZ
DENAIR COMMUNITY SERVICES DISTRICT
DENAIR FIRE DISTRICT
DENAIR MUNICIPAL ADVISORY COUNCIL
DENAIR POST OFFICE
DENAIR UNIFIED SCHOOL DISTRICT
DOCTOR'S MEDICAL CENTER
EAST SIDE MOSQUITO ABATEMENT DIST
EAST STANISLAUS RESOURCES CONSERVATION DISTRICT
EASTIN WATER DISTRICT
EASTSIDE WATER DISTRICT
ECONOMIC DEVELOPMENT ACTION COMMITTEE
EDEN HOUSING
EL SOLYO WATER DISTRICT
EMERGENCY MEDICAL SERVICES COMMITTEE
EMPIRE MUNICIPAL ADVISORY COUNCIL
EMPIRE SANITARY DISTRICT
EMPIRE UNION SCHOOL DIST
ENTERPRISE COMMUNITY PARTNERS
ENVIRONMENTAL DIVISION DIRECTORATE OF PUBLIC WORKS
FARMLAND WORKING GROUP
F&M BANK
FRONTIER COMMUNICATIONS WEST REGION
GIULIANI & KULL
GOLDEN VALLEY HEALTH CENTER
GRATTON SCHOOL DISTRICT
GRAYSON COMMUNITY SERVICES DISTRICT
HART RANSOM UNION SCHOOL DISTRICT

ENVIRONMENTAL REVIEW REFERRALS

HAWKINS & ASSOCIATES ENGINEERING
HEALTH PLAN OF SAN JOAQUIN
HICKMAN MUNICIPAL ADVISORY COUNCIL
HICKMAN SCHOOL DISTRICT
HILLS FERRY CEMETERY DISTRICT
HORIZON CONSULTING
HOUSING AUTHORITY, COUNTY OF STANISLAUS
HUGHSON CHAMBER OF COMMERCE
HUGHSON FIRE DISTRICT
HUGHSON UNIFIED SCHOOL DISTRICT
INDUSTRIAL FIRE DISTRICT
KAISER FOUNDATION HEALTH PLAN, INC.
KEYES COMMUNITY SERVICES DISTRICT
KEYES FIRE DISTRICT
KEYES MUNICIPAL ADVISORY COUNCIL
KEYES MUNICIPAL ADVISORY COUNCIL
KEYES SCHOOL DISTRICT
KNIGHTS FERRY CEMETERY DISTRICT
KNIGHTS FERRY COMMUNITY SERVICES DISTRICT
KNIGHTS FERRY HISTORICAL SOCIETY
KNIGHTS FERRY MUNICIPAL ADVISORY COUNCIL
KNIGHTS FERRY SCHOOL DISTRICT
LA GRANGE ELEMENTARY SCHOOL
LA GRANGE IMPROVEMENT ASSOCIATION
LA LOMA ASSOCIATION
LLOYD PLOUTZ
LODI ASSOCIATION OF REALTORS
MARIPOSA COUNTY PLANNING
MERCED COUNTY PLANNING
MERCY HOUSING
MID-VALLEY ENGINEERING
MODESTO & EMPIRE TRACTION COMPANY
MODESTO BEE
MODESTO CHAMBER OF COMMERCE
MODESTO CITY COUNCIL
MODESTO CITY SCHOOL DISTRICT
MODESTO CITY/COUNTY AIRPORT
MODESTO DISPOSAL
MODESTO IRRIGATION DISTRICT, GENERAL SERVICES
MODESTO POSTMASTER
MONTEREY PARK TRACT COMMUNITY SERVICES DISTRICT
MOUNTAIN VALLEY EMERGENCY MEDICAL SERVICES
MOUNTAIN VIEW FIRE DISTRICT
MUIR CONSULTING
NEWMAN - CROWS LANDING SCHOOL DISTRICT
NEWMAN FLYING SERVICE
NEWMAN ROTARY

ENVIRONMENTAL REVIEW REFERRALS

NORTHERN VALLEY YOKUTS TRIBE
NORTHSTAR ENGINEERING
OAKDALE AIRPORT
OAK FLAT WATER DISTRICT
OAK VALLEY HOSPITAL DISTRICT
OAKDALE CHAMBER OF COMMERCE
OAKDALE IRRIGATION DISTRICT
OAKDALE JOINT UNIFIED SCHOOL DISTRICT
OAKDALE RURAL FIRE DISTRICT
O'DELL ENGINEERING
ORESTIMBA CREEK FLOOD CONTROL
PARADISE SCHOOL DISTRICT
PATTERSON CEMETERY DISTRICT
PATTERSON IRRIGATION DISTRICT
PATTERSON IRRIGATOR
PATTERSON JOINT UNIFIED SCHOOL DISTRICT
PATTERSON POSTMASTER
PATTERSON-WESTLEY CHAMBER OF COMMERCE
PETRULAKIS LAW AND ADVOCACY, APC
PG&E
POLICE ACTIVITIES LEAGUE
RB WELTY & ASSOCIATES
RIVERBANK SCHOOL DISTRICT
RIVERDALE PARK TRACT COMMUNITY SERVICES DISTRICT
ROBERTS FERRY ELEMENTARY SCHOOL
ROCK CREEK WATER DISTRICT
ROMERO-NEWMAN WATER DISTRICT
RON WEST & ASSOCIATES
S MODESTO MUNICIPAL ADVISORY COUNCIL
S SAN JOAQUIN IRRIGATION DISTRICT
S.T.A.R
SALIDA FIRE PROTECTION DISTRICT
SALIDA MUNICIPAL ADVISORY COUNCIL
SALIDA RESOURCE CONSERVATION DISTRICT
SALIDA SANITARY DISTRICT
SALIDA UNION SCHOOL DISTRICT
SAN FRANCISCO PUBLIC UTILITIES COMMISSION, PROJECT MANAGEMENT DIVISION
SAN FRANCISCO PUBLIC UTILITIES, HETCH HETCHY WATER AND POWER
SAN JOAQUIN COUNTY PLANNING
SAN JOAQUIN COUNTY PUBLIC WORKS
SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT
SAN LUIS & DELTA-MENDOTA WATER AUTHORITY
SAND CREEK FLOOD CONTROL DISTRICT
SANTA CLARA COUNTY ROADS & AIRPORTS: PLANNING DIVISION
SELF HELP ENTERPRISES
SHILOH SCHOOL DISTRICT
SIERRA NORTHERN RAILROAD

ENVIRONMENTAL REVIEW REFERRALS

SOUTHERN SIERRA MIWUK NATION
STANCO
STANISLAUS CHILD DEVELOPMENT LOCAL PLANNING COUNCIL
STANISLAUS CONSOLIDATED FIRE PROTECTION DISTRICT
STANISLAUS COUNCIL OF GOVERNMENTS
STANISLAUS COUNTY AFFORDABLE HOUSING
STANISLAUS COUNTY AG COMMISSIONER
STANISLAUS COUNTY AREA AGING AND VETERANS SERVICES
STANISLAUS COUNTY BEHAVIORAL HEALTH AND RECOVERY SERVICES
STANISLAUS COUNTY BOARD OF SUPERVISORS
STANISLAUS COUNTY CHIEF EXECUTIVE OFFICE
STANISLAUS COUNTY CHILD ABUSE PREVENTION COUNCIL
STANISLAUS COUNTY CHILDREN AND FAMILIES COMMISSION
STANISLAUS COUNTY COMMISSION ON AGING
STANISLAUS COUNTY COMMUNITY HEALTH CENTER BOARD
STANISLAUS COUNTY COMMUNITY SERVICES AGENCY
STANISLAUS COUNTY COUNSEL
STANISLAUS COUNTY DEPARTMENT HEADS
STANISLAUS COUNTY DEPARTMENT OF ENVIRONMENTAL RESOURCES
STANISLAUS COUNTY EQUAL RIGHTS COMMISSION
STANISLAUS COUNTY FARM BUREAU
STANISLAUS COUNTY FIRE PREVENTION BUREAU
STANISLAUS COUNTY GENERAL PLAN UPDATE COMMITTEE
STANISLAUS COUNTY GENERAL SERVICES AGENCY
STANISLAUS COUNTY HEALTH SERVICES AGENCY
STANISLAUS COUNTY OFFICE OF EDUCATION
STANISLAUS COUNTY PLANNING AND COMMUNITY DEVELOPMENT DEPARTMENT
STANISLAUS COUNTY PUBLIC WORKS
STANISLAUS COUNTY SHERIFF
STANISLAUS COUNTY VETERANS ADVISORY COUNCIL
STANISLAUS ECONOMIC DEVELOPMENT AND WORKFORCE ALLIANCE
STANISLAUS HABITAT FOR HUMANITY
STANISLAUS LOCAL AREA FORMATION COMMISSION
STANISLAUS MENTAL HEALTH BOARD
STANISLAUS PROBATION
STANISLAUS SUPERIOR COURT
STANISLAUS UNION SCHOOL DIST
STANISLAUS-CERES REDEVELOPMENT
STANTEC
STATE ASSEMBLY, DISTRICT 12
STATE BOARD OF EQUALIZATION
STATE COUNCIL ON DEVELOPMENTAL DISABILITIES
STATE SENATE, DISTRICT 14
STATE VETERAN'S AFFAIRS
STRATEGIC PLANS S3 NTC, FT IRWIN NATIONAL TRAINING CENTER
SUTTER HEALTH
SYLVAN UNION SCHOOL DISTRICT

ENVIRONMENTAL REVIEW REFERRALS

THE ALLIANCE WORKNET
TULE RIVER INDIAN TRIBE
TUOLUMNE BAND OF ME-WUK
TUOLUMNE COUNTY PLANNING
TUOLUMNE RIVER TRUST
TURLOCK CHAMBER OF COMMERCE
TURLOCK IRRIGATION DISTRICT
TURLOCK MOSQUITO ABATEMENT DISTRICT
TURLOCK RURAL FIRE DISTRICT
TURLOCK SCHOOL DISTRICT
UC COOOPERATIVE EXTENSION
UNION PACIFIC RAILROAD GENERAL LAW
US AIR FORCE
US AIR FORCE, WESTERN REGION ENVIRONMENTAL OFFICE
US ARMY CORPS OF ENGINEERS
US BUREAU OF RECLAMATION
US DEPT OF HOUSING & URBAN DEVELOPMENT
US ENVIRONMENTAL PROTECTION AGENCY
US FISH & WILDLIFE
US NAVY, NAVY REGION SOUTHWEST
USDA NATIONAL RESOURCES CONSERVATION SERVICES, SERVICE CENTER
VALLEY HOME JOINT SCHOOL DISTRICT
VALLEY HOME MUNICIPAL ADVOSIRY COUNCIL
VALLEY MOUNTAIN REGIONAL CENTER
WATERFORD CHAMBER OF COMMERCE
WATERFORD SCHOOL DISTRICT
WEST MODESTO/KING KENNEDY NEIGHBORHOOD COLLABORATIVE
WEST STANISLAUS FIRE DISTRICT
WEST STANISLAUS IRRIGATION DISTRICT
WEST STANISLAUS RESOURCE CONSERVATION DISTRICT
WESTERN HILLS WATER DISTRICT
WESTLEY COMMUNITY SERVICES DISTRICT
WESTPORT FIRE DISTRICT
WESTSIDE COMMUNITY HEALTHCARE DISTRICT
WOODLAND AVE FIRE DISTRICT
YOSEMITE COMMUNITY COLLEGE DISTRICT
ZEPHYR HOMES