

**STANISLAUS COUNTY PLANNING COMMISSION**

January 7, 2016

**STAFF REPORT**

**USE PERMIT APPLICATION NO. PLN2015-0068  
A.L. GILBERT CO.**

**REQUEST: TO CONSTRUCT A 37-FOOT HIGH, 60,000 SQUARE-FOOT WAREHOUSE ON A 15± ACRE PARCEL. THE WAREHOUSE WILL BE USED TO STORE RAW MATERIALS (FEED AND SEED) WAITING TO BE PROCESSED AT 4431, AND 4367 JESSUP ROAD.**

**APPLICATION INFORMATION**

Property Owner:	A.L. Gilbert Co.
Applicant/Agent:	Kevin Bennett, Justin W. Capp, Inc.
Location:	4346 Jessup Road, north of Keyes Road, east of Faith Home Road, west of Highway 99, in the Keyes area.
Section, Township, Range:	31-4-10
Supervisory District:	Two (Supervisor Chiesa)
Assessor's Parcel:	045-045-024
Referrals:	See Exhibit G Environmental Review Referrals
Area of Parcel(s):	15.8± acres
Water Supply:	Keyes Community Services District
Sewage Disposal:	Keyes Community Services District
Existing Zoning:	A-2-10 (General Agriculture)
General Plan Designation:	P-D (Planned Development)
Sphere of Influence:	Not Applicable
Community Plan Designation:	P-I (Planned Industrial)
Williamson Act Contract No.:	Not Applicable
Environmental Review:	Mitigated Negative Declaration
Present Land Use:	Vacant land with truck parking
Surrounding Land Use:	A.L. Gilbert Co.'s manufacturing facility to the north; Keyes Community Service District facility corporation yard, and warehouses to the west; Keyes Road, and agricultural crops to the south; A.L. Gilbert Co. storage site, agricultural crops, State Highway 99, and Union Pacific Railroad to the east.

**RECOMMENDATION**

Staff recommends the Planning Commission approve this request based on the discussion below and on the whole of the record provided to the County. If the Planning Commission decides to approve the project, Exhibit A provides an overview of all of the findings required for project approval which includes use permit findings.

## **PROJECT DESCRIPTION**

This is a request to construct a 37-foot high, 60,000 square-foot warehouse with a 6,240 square-foot canopy, on a 15± acre parcel. Five thousand (5,000) square feet within the proposed warehouse will be reserved for future office space. The warehouse will be used to store raw materials (feed and seed) waiting to be processed at 4431, and 4367 Jessup Road where the product is manufactured and packaged as bulk dairy feed.

The project site takes access on to Jessup Road, and through a private road which extends beyond Jessup Road. The Jessup Road entrance includes a truck scale, equipped with a traffic control light. The traffic control light will allow for trucks to enter the project site, without creating traffic back-up into the Jessup Road right-of-way. The project proposes a future rail dock and extension of the existing private rail line across Jessup Road, to accommodate the proposed warehouse.

Although the site is not currently served by municipal services (sewer & water), the applicant is proposing to have the site be served by the Keyes Community Services District (CSD), the provider of sewer and water for this community. The Keyes CSD provided a letter stating that they are capable of providing water and sewer services to the project site; however, prior to connection, the entire site must be annexed into the CSD via the LAFCO application and approval process. The water and sewer service is contingent on an agreement with the Keyes CSD regarding construction of infrastructure and the payment of fees. (See Exhibit D – *Keyes CSD Will-Serve Letter dated July 14, 2015, and Boundary and Sphere of Influence Map.*) As per Conditions of Approval a building permit for the project site will not be issued until: 1) the LAFCO annexation process, or an out of service agreement is completed, 2) needed on and off-site water and sewer infrastructure has been completed, 3) CSD fees paid in full, and 4) a final will-serve letter submitted to the Building Permits Division.

Proposed operating hours for the warehouse are Monday through Friday from 6:00 a.m. to 6:00 p.m.; however, there are no limitations on operating hours for this project. The maximum number of employees per shift will be six (6), and the minimum number of employees per shift will be four (4). The applicant has proposed an asphalt parking lot, with a total of 61 on-site parking spaces, three (3) of which are handicap accessible. The extra parking spaces on-site will be used to accommodate any overflow from adjacent A.L. Gilbert Co. properties.

A lift station and swale is proposed along the southern boundary of the property along Keyes Road to maintain stormwater on-site. This drainage method shall be “blended” into the project site via landscaping and/or screening so as to address visual impacts from Keyes Road. All landscaping shall comply with the Model Water Efficient Landscape Ordinance (MWELo) and local drought control measures.

## **SITE DESCRIPTION**

The 15.8 acre project site is located at 4346 Jessup Road, which is currently vacant land with truck parking; however, there are no land use permits on file with the planning department for a truck parking facility. Stanislaus County aerial images show row crops grown on-site as early as 2010. The project site is generally bordered by SR 99 to the north, and east; Keyes Road to the south; and Faith Home Road located to the west, in the unincorporated community of Keyes (See Exhibit B – *Maps*).

Surrounding land uses consist of A.L. Gilbert Co.’s manufacturing facility to the north, zoned M (Industrial); Keyes Community Service District facility corporation yard, warehousing, and light industrial parcels to the east, and northeast, zoned PD (Planned Development); State Highway 99,

Union Pacific railroad, truck parking, zoned A-2-10 (General Agriculture), and industrial uses, zoned M (Industrial) to the west; a single-family dwelling, orchards, and row crops, zoned A-2-40 (General Agriculture) and Keyes Road to the south.

## **ISSUES**

No issues have been identified during the review of this application. Standard conditions of approval have been added to this project to address less than significant impacts associated with the proposed use. Two mitigation measures are incorporated to address identified potentially significant impacts. (*See Exhibit C - Conditions of Approval*)

## **GENERAL AND COMMUNITY PLAN CONSISTENCY**

The project site is currently designated Planned Development (PD) in the Stanislaus County General Plan (*See Exhibit B – Maps*). The PD designation is intended for land which, because of demonstrably unique characteristics, may be suitable for a variety of uses without detrimental effects on other property. Land within a PD designation should be zoned A-2 (General Agriculture) until development occurs through PD zoning. PD zones (which, with the A-2 zone, are the only zoning districts consistent with this designation) is applied through application and submission of specific development plans. Building intensity and population density would be determined by the County on an individual basis, depending upon the nature and location of the proposed planned development.

The project site is currently designated Planned Industrial in the Keyes Community Plan (*See Exhibit B – Maps*). Stanislaus County has adopted Community Plans for most of the unincorporated communities in the County. These plans outline the future growth patterns of each community. Each plan is used in conjunction with the General Plan to indicate the desired land use “vision” for the town. According to the Keyes Community Plan, Industrial, and Planned Industrial land uses west of State Highway 99 are buffered from sensitive land uses to the east of Highway 99. Industrial and Planned Industrial uses are afforded direct access to heavy rail service, and vital regional north-south and east-west transportation corridors.

Approval of this project would result in a development consistent with the aforementioned businesses and the Community Plan and, as such, staff believes this use can be determined by the County to be consistent with development in the area and supportive of the overall goals and policies of the Keyes Community Plan.

Community Plans are required to be consistent with the General Plan; however, Community Plans function as the General Plan in areas/communities where a Community Plan has been adopted. The Land Use Element of the General Plan states that the General Agriculture (A-2) zone is consistent with the Planned Development (P-D) General Plan, and the Planned Industrial (P-I) Community Plan designation.

## **ZONING ORDINANCE CONSISTENCY**

The current site is zoned A-2-10 (General Agriculture, 10 acre minimum). Section 21.20.030(A) (1) of the Stanislaus County Zoning Ordinance allows for warehouses for storage of grain and other farm produce, as Tier One uses. Tier One uses, are closely related to agriculture, considered to be necessary for a healthy agricultural economy, and may be allowed when the Planning Commission makes the following findings:

- 1.) The establishment, maintenance, and operation of the proposed use or building applied for is consistent with the General Plan designation of "Agriculture" and will not, under the circumstances of the particular case, be detrimental to the health, safety, and general

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

- 2.) The use as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity.

The proposed use for storage of unprocessed feed and seed is consistent with Tier One uses, as previously mentioned. Any future change of use of the warehouse may cause for addition discretionary review either through a rezone, or a use permit which would allow for the proposed use to meet the General Plan, and Community Plan designations.

The applicant has provided a total of 61 on-site parking spaces, three (3) of which are identified as handicap accessible. Section 21.76.070 of the Stanislaus County Zoning Ordinance states that warehouses require one space for each employee on a maximum shift plus three additional spaces, or, when the number of employees cannot be determined, one space for every three hundred square feet of gross floor area. The applicant has identified that nine (9) parking spaces are required for a maximum of six (6) employees per shift plus three (3) additional spaces. The applicant has reserved 17 on-site parking spaces for the future 5,000 square-foot office, meeting the one per three hundred parking requirement.

### **ENVIRONMENTAL REVIEW**

Pursuant to the California Environmental Quality Act (CEQA), the proposed project was circulated to all interested parties and responsible agencies for review and comment and no significant issues were raised. (See Exhibit G- *Environmental Review Referrals*.) A Mitigated Negative Declaration has been prepared for approval prior to action on the use permit itself as the project will not have a significant effect on the environment. (See Exhibit F – *Mitigated Negative Declaration*.) Conditions of approval reflecting referral responses have been placed on the project. (See Exhibit C - *Conditions of Approval*.)

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**Note:** Pursuant to California Fish and Game Code Section 711.4, all project applicants subject to the California Environmental Quality Act (CEQA) shall pay a filing fee for each project; therefore, the applicant will further be required to pay **\$2,267.25** for the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the Clerk Recorder filing fees. The attached Development Standards ensure that this will occur.

Contact Person: Timothy Vertino, Assistant Planner, (209) 525-6330

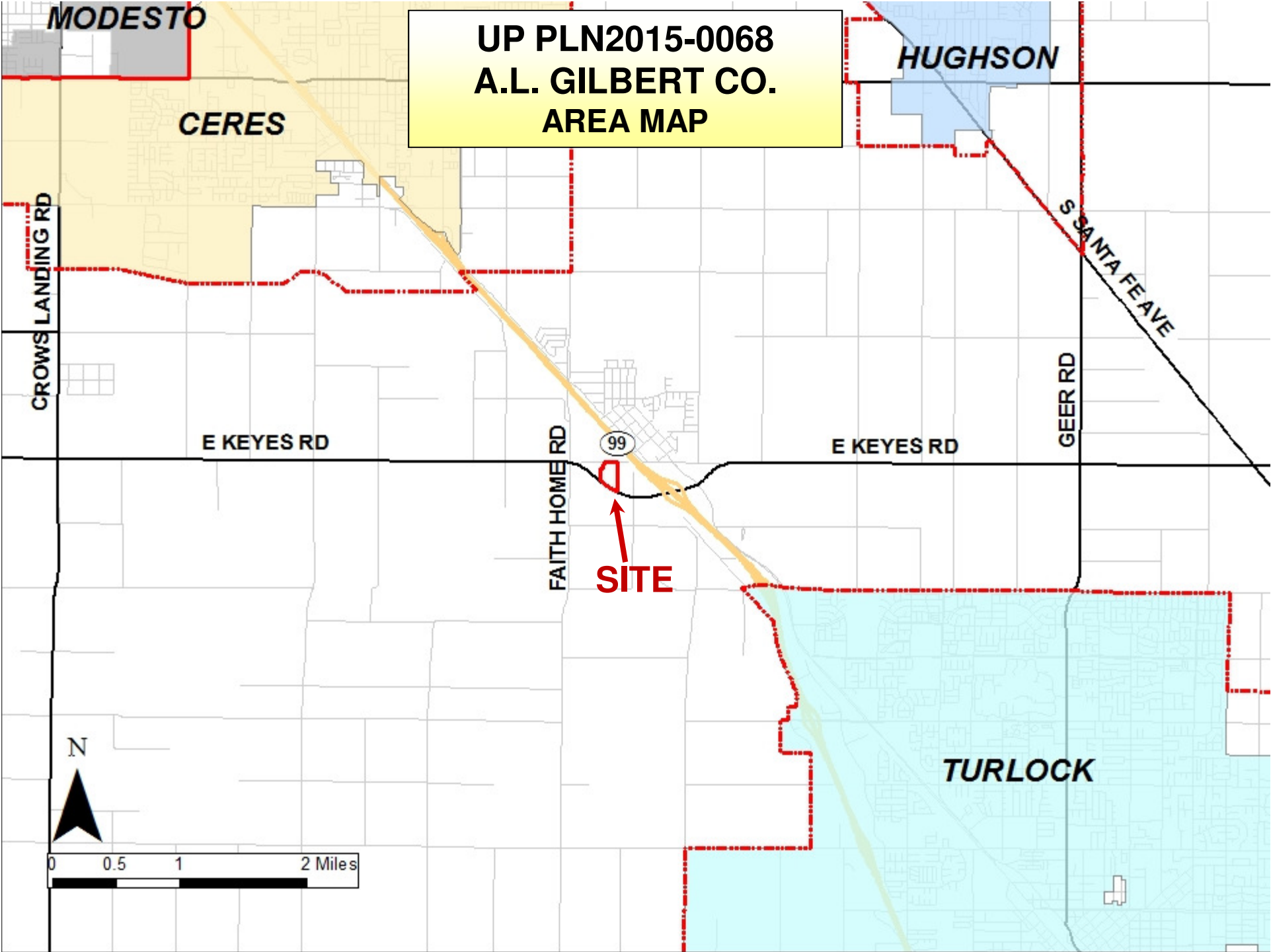
#### Attachments:

- Exhibit A - Findings and Actions Required for Project Approval
- Exhibit B - Maps, Site Plan, Elevations
- Exhibit C - Conditions of Approval
- Exhibit D - Keyes CSD Will-Serve Letter dated July 14, 2015, and Boundary and Sphere of Influence Map
- Exhibit E - Initial Study
- Exhibit F - Mitigated Negative Declaration
- Exhibit G - Environmental Review Referrals

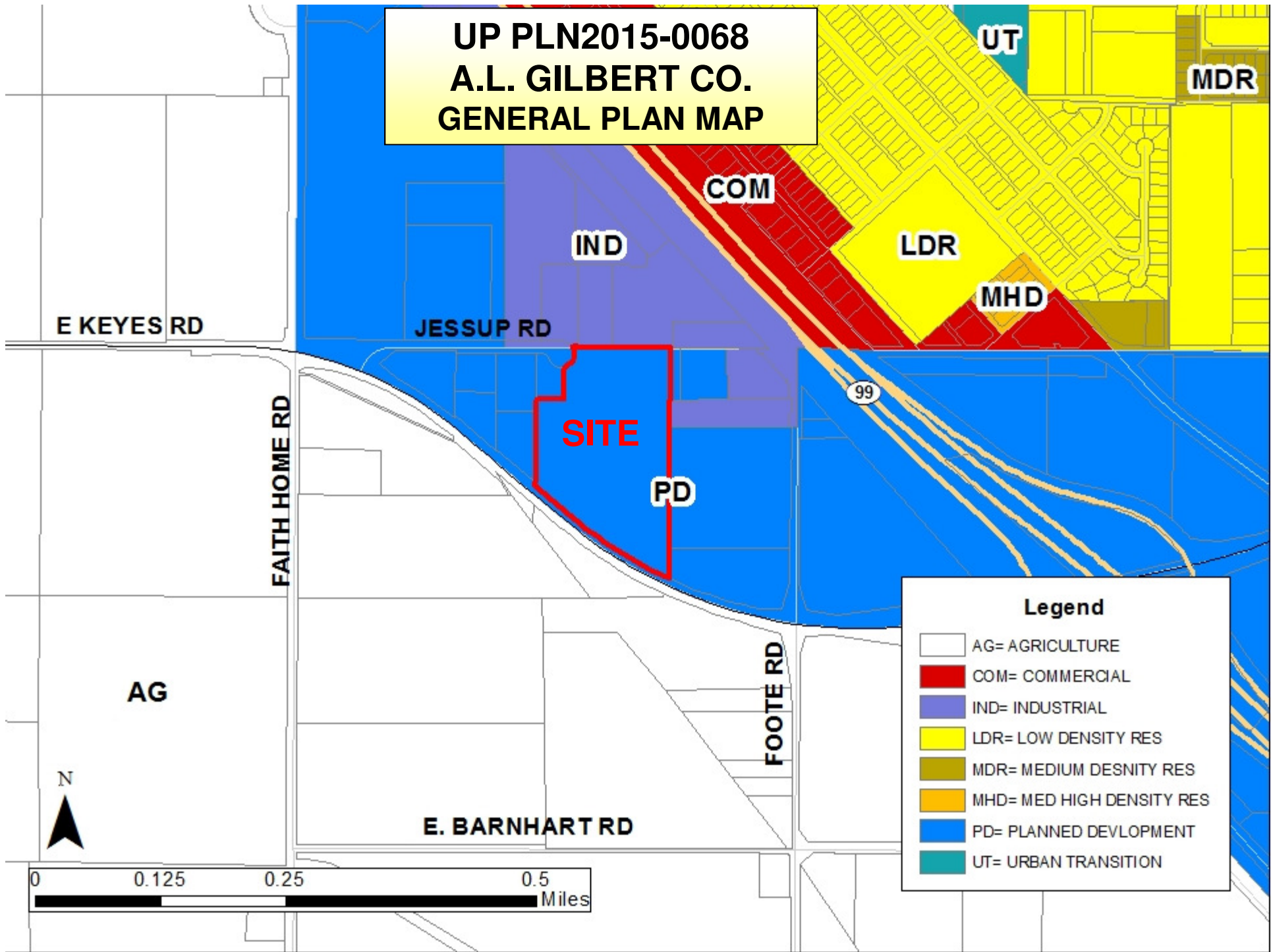
**Exhibit A**  
**Findings and Actions Required for Project Approval**

1. Adopt the Mitigated Negative Declaration pursuant to CEQA Guidelines Section 15074(b), by finding that on the basis of the whole record, including the Initial Study and any comments received, that there is no substantial evidence the project will have a significant effect on the environment and that the Mitigated Negative Declaration reflects Stanislaus County's independent judgment and analysis.
2. Order the filing of a Notice of Determination with the Stanislaus County Clerk-Recorder pursuant to Public Resources Code Section 21152 and CEQA Guidelines Section 15075.
3. Find that:
  - (a). The establishment, maintenance, and operation of the proposed use or building applied for is consistent with the General Plan designation of "Agriculture" and will not, under the circumstances of the particular case, be detrimental to the health, safety, and general welfare of persons residing or working in the neighborhood of the use and that it will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County; and
  - (b). the use as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity.
4. Approve Use Permit Application No. PLN2015-0068 – A.L. Gilbert Co., subject to the attached Conditions of Approval and Mitigation Measures.

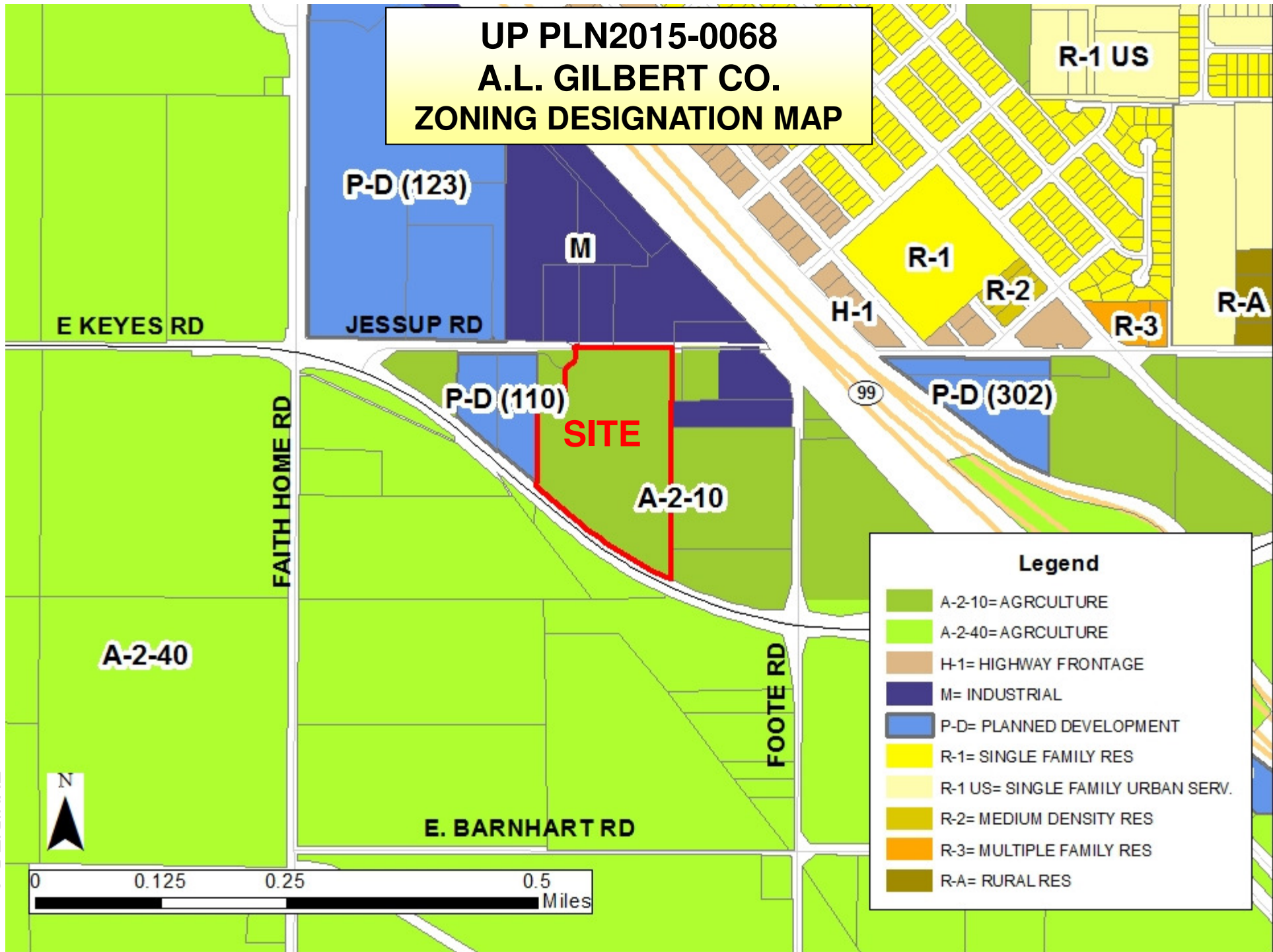
**UP PLN2015-0068  
A.L. GILBERT CO.  
AREA MAP**



**UP PLN2015-0068  
A.L. GILBERT CO.  
GENERAL PLAN MAP**

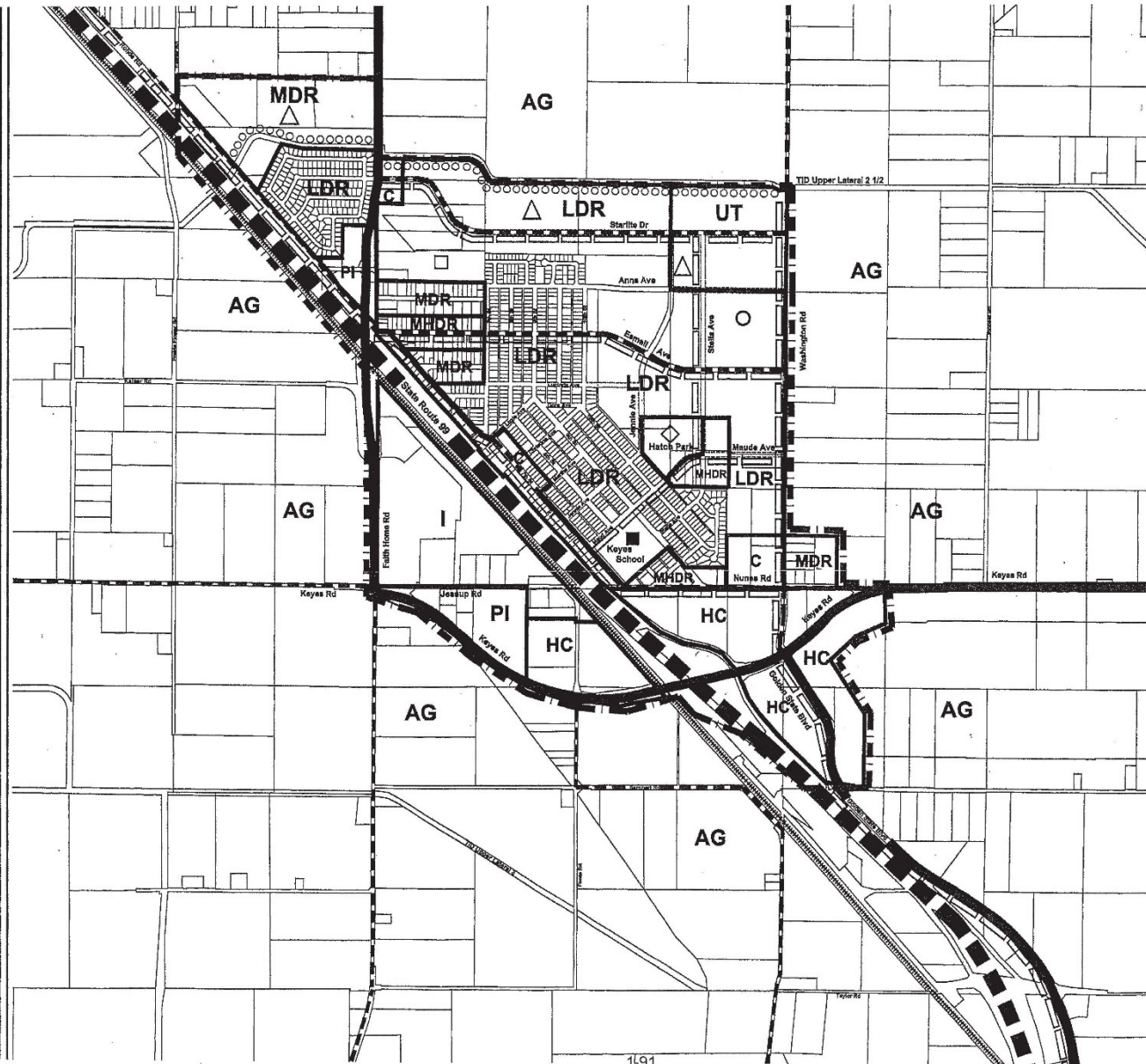


**UP PLN2015-0068  
A.L. GILBERT CO.  
ZONING DESIGNATION MAP**





(PLEASE NOTE: ALL CIRCULATION/TRANSPORTATION DESIGNATIONS IN THE COMMUNITY PLANS HAVE BEEN SUPERCEDED BY THE FOCUSED GENERAL PLAN UPDATE, GPA 2004-03, ADOPTED ON APRIL 18, 2006.) REFER TO CHAPTER 2



# Keyes

## Community Plan

### Land Use Designations

- AG** Agriculture
- UT** Urban Transition
- LDR** Low Density Residential (0-7 du / acre)
- MDR** Medium Density Residential (0-14 du / acre)
- MHDR** Medium-High Density Residential (0-25 du / acre)
- C** Commercial
- HC** Highway Commercial
- I** Industrial
- PI** Planned Industrial

### Parks and Schools

- |                   | Existing | Proposed* |
|-------------------|----------|-----------|
| Neighborhood Park | ▲        | △         |
| Community Park    | ◆        | ◇         |
| Elementary School | ■        | □         |
| Middle School     | ●        | ○         |

\*Symbol denotes general location.

### Circulation

- Highway / Freeway
- Major Road
- Collector
- Future Road
- Railroad
- Bike Lane
- Multi-purpose Trail

### Relevant Boundaries

- Community Plan Boundary

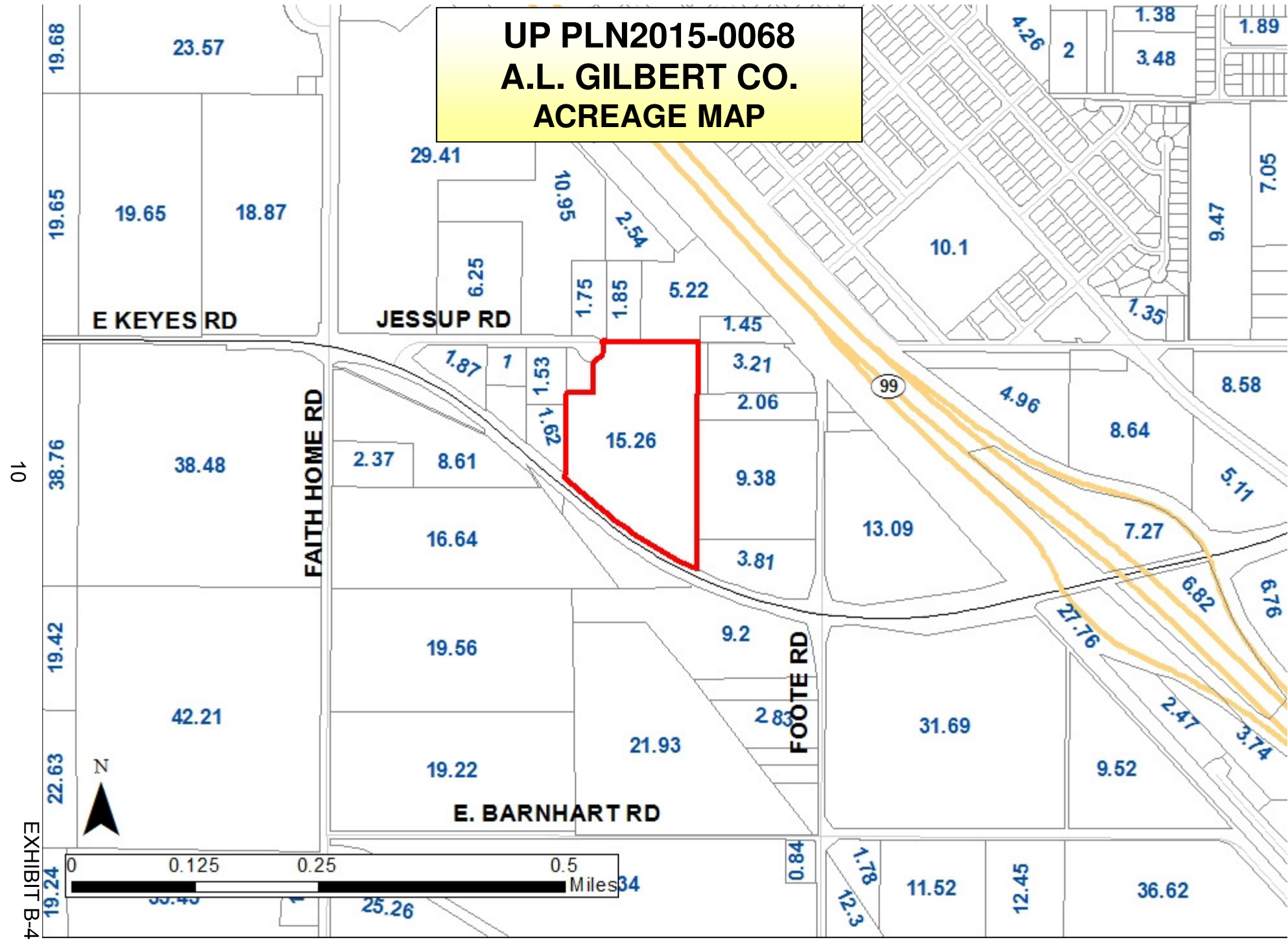


Scale: 1" = 500'



**RRM DESIGN GROUP**  
 Architects • Planners • Engineers • Surveyors • Interior • Landscape Architects  
 10 South Street, San Mateo, California 94401-3010  
 1000 South Airport Blvd., San Jose, California 95128-1194  
 Tel: 650.593.8800 Fax: 650.593.8801  
 April 18, 2000

**UP PLN2015-0068  
A.L. GILBERT CO.  
ACREAGE MAP**



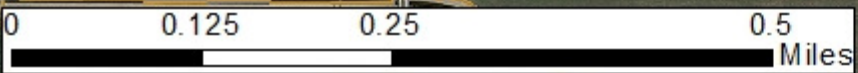
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EXHIBIT B-4

**UP PLN2015-0068  
A.L. GILBERT CO.  
2013 COUNTY AERIAL MAP**

**SITE**

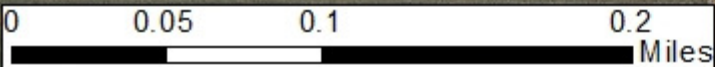
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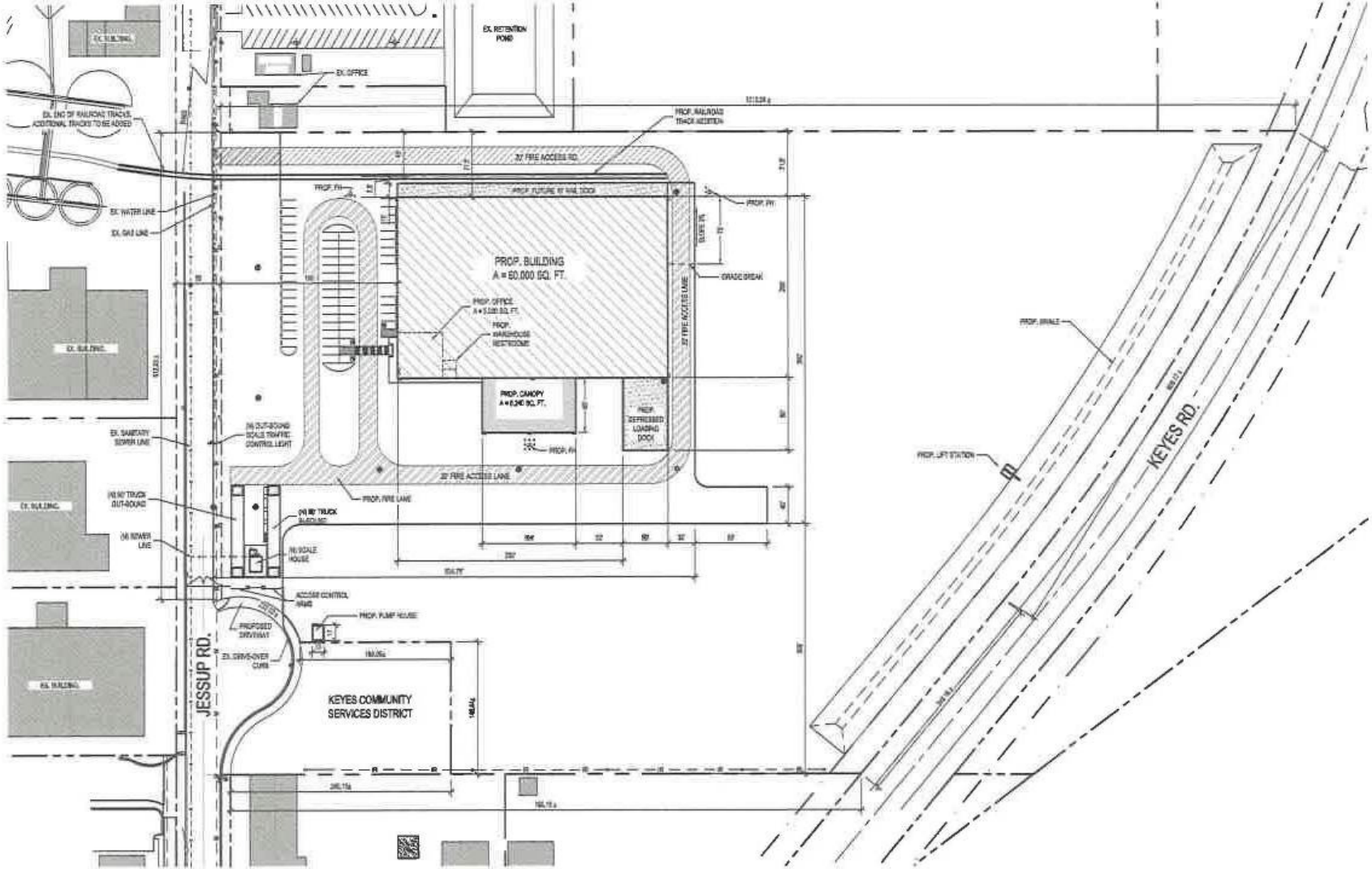
**UP PLN2015-0068  
A.L. GILBERT CO.  
2013 COUNTY AERIAL MAP**

**SITE**

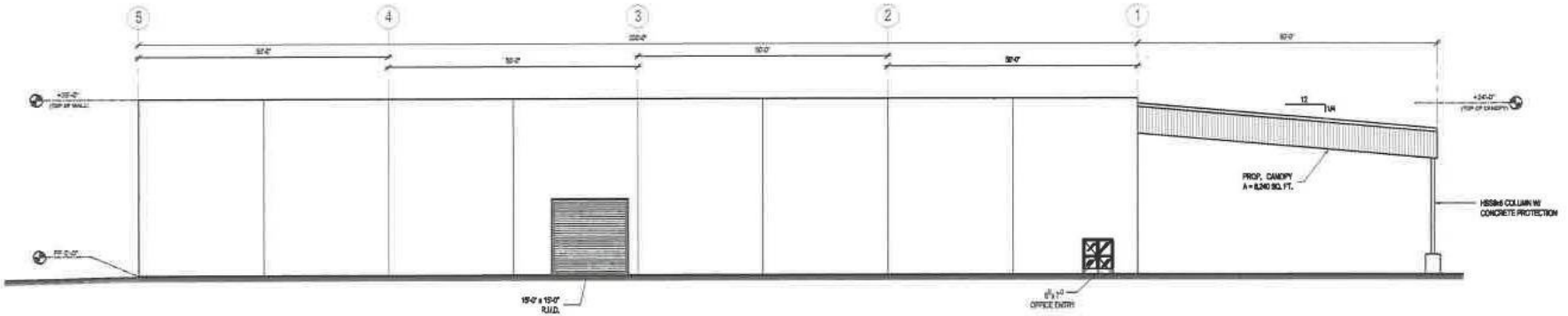
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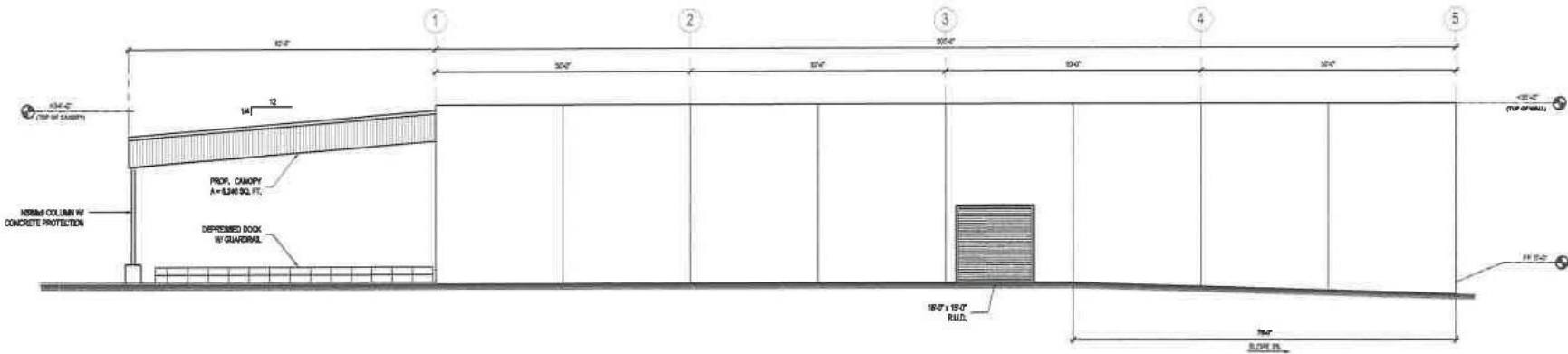
**UP PLN2015-0068  
A.L. GILBERT CO.  
SITE PLAN**



**UP PLN2015-0068  
A.L. GILBERT CO.  
ELEVATIONS**

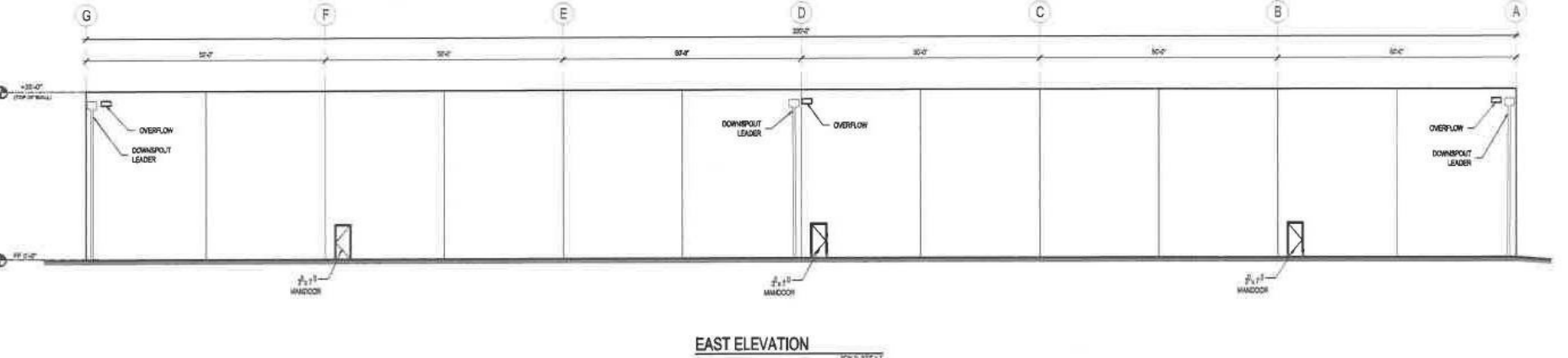
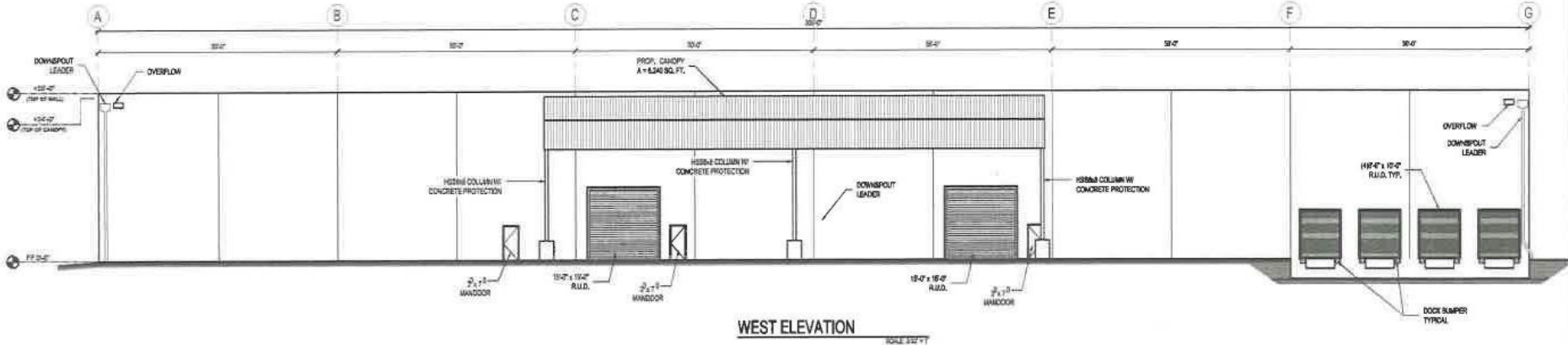


**NOTRH ELEVATION**  
SCALE 3/32" = 1'-0"



**SOUTH ELEVATION**  
SCALE 3/32" = 1'-0"

# UP PLN2015-0068 A.L. GILBERT CO. ELEVATIONS



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NOTE: Approval of this application is valid only if the following conditions are met. This permit shall expire unless activated within 18 months of the date of approval. In order to activate the permit, it must be signed by the applicant and one of the following actions must occur: (a) a valid building permit must be obtained to construct the necessary structures and appurtenances; or, (b) the property must be used for the purpose for which the permit is granted. (Stanislaus County Ordinance 21.104.030)

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## **CONDITIONS OF APPROVAL**

### **USE PERMIT APPLICATION NO. PLN2015-0068 A.L. Gilbert Co.**

#### **Department of Planning and Community Development**

1. The use shall be conducted as described in the application and supporting information (including the plot plan) as approved by the Planning Commission and/or Board of Supervisors and in accordance with other laws and ordinances.
2. Pursuant to Section 711.4 of the California Fish and Game Code (effective January 1, 2014), the applicant is required to pay a California Department of Fish and Wildlife (formerly the Department of Fish and Game) fee at the time of filing a "Notice of Determination". Within five (5) days of approval of this project by the Planning Commission or Board of Supervisors, the applicant shall submit to the Department of Planning and Community Development a check for **\$2,267.25**, made payable to **Stanislaus County**, for the payment of California Department of Fish and Wildlife and Clerk Recorder filing fees.  
  
Pursuant to Section 711.4 (e) (3) of the California Fish and Game Code, no project shall be operative, vested, or final, nor shall local government permits for the project be valid, until the filing fees required pursuant to this section are paid.
3. Developer shall pay all Public Facilities Impact Fees and Fire Facilities Fees as adopted by Resolution of the Board of Supervisors. The fees shall be payable at the time of issuance of a building permit for any construction in the development project and shall be based on the rates in effect at the time of building permit issuance.
4. The applicant/owner is required to defend, indemnify, or hold harmless the County, its officers, and employees from any claim, action, or proceedings against the County to set aside the approval of the project which is brought within the applicable statute of limitations. The County shall promptly notify the applicant of any claim, action, or proceeding to set aside the approval and shall cooperate fully in the defense.
5. All exterior lighting shall be designed (aimed down and toward the site) to provide adequate illumination without a glare effect. This shall include, but not be limited to, the use of shielded light fixtures to prevent skyglow (light spilling into the night sky) and the installation of shielded fixtures to prevent light trespass (glare and spill light that shines onto neighboring properties).



6. Any construction resulting from this project shall comply with standardized dust controls adopted by the San Joaquin Valley Air Pollution Control District (SJVAPCD) and may be subject to additional regulations/permits, as determined by the SJVAPCD.
7. A sign plan for all proposed on-site signs indicating the location, height, area of the sign(s), and message must be approved by the Planning Director or appointed designee(s) prior to installation.
8. The Department of Planning and Community Development shall record a Notice of Administrative Conditions and Restrictions with the County Recorder's Office within 30 days of project approval. The Notice includes: Conditions of Approval/Development Standards and Schedule; any adopted Mitigation Measures; and a project area map.
9. Should any archeological or human remains be discovered during development, work shall be immediately halted within 150 feet of the find until it can be evaluated by a qualified archaeologist. If the find is determined to be historically or culturally significant, appropriate mitigation measures to protect and preserve the resource shall be formulated and implemented. The Central California Information Center shall be notified if the find is deemed historically or culturally significant.
10. Any future change of use of the proposed warehouse may need further discretionary review, and or additional permitting from the Planning Department.
11. Landscaping: A landscaping plan indicating plan species, initial size, location and method of irrigation shall be approved by the planning director, or designee, prior to issuance of any building permit. All landscaping shall be in compliance with County Code and California Model Water Efficiency Landscape Ordinance and utilize "gateway treatments" in areas visible from Keyes Road. Landscaping shall be used to "blend" the storm water facilities into the site.

The applicant, or subsequent property owner(s), shall be responsible for maintaining landscape plants in a healthy and attractive condition. Dead or dying plants shall be replaced with materials of equal size and similar variety.

**Department of Public Works**

12. An Encroachment Permit shall be obtained for any new driveway onto Jessup Road, if required.
13. No parking, loading, or unloading of vehicles shall be permitted within the county road right-of-way.
14. A grading and drainage plan for the project site shall be submitted with the grading or building permit. Public Works will review and approve the drainage calculations. The grading and drainage plan shall include the following information:
  - A. Drainage calculations shall be prepared as per the Stanislaus County Standards and Specifications that are current at the time the permit is issued.

- B. The plan shall contain enough information to verify that all runoff will be kept from going onto adjacent properties and Stanislaus County road right-of-way.
  - C. The grading and drainage plan shall comply with the National Pollutant Discharge Elimination System (NPDES) General Permit and Stanislaus County storm water treatment and quality standards.
  - D. The grading, drainage, and associated work shall be accepted by Stanislaus County Public Works prior to a final inspection or occupancy, as required by the building permit.
  - E. The applicant of the grading/building permit shall pay the current Stanislaus County Public Works weighted labor rate for the plan review of the building and/or grading plan and all inspection fees. The Public Works inspector shall be contacted 48 hours prior to the commencement of any grading or drainage work on-site. The plans shall not be released until such time that all plan check and inspection fees have been paid.
15. If trucks line up in Jessup Road that are waiting to be weighed before entering the site, the scale used to weigh outgoing trucks will be opened up to weigh the incoming trucks until such a time that trucks are no longer waiting in the road right-of-way.

### **Building Permits Division**

- 16. Building permits are required and the project shall comply with the CA Code of Regulations, Title 24. The site and structures shall comply with handicap accessibility requirements.
- 17. A valid "Will-Serve Letter" shall be provided to the Building Permits Division when applying for a building permit associated with this project.

### **Turlock Irrigation District**

- 18. Prior to the issuance of a building permit the developer shall submit plans detailing the existing irrigation facilities, relative to the proposed site improvements, in order for TID to determine specific impacts and requirements.
- 19. TID shall review and approve all maps and plans for this project. Any improvements to this property which impact irrigation facilities shall be subject to the District's approval and meet all TID standards and specifications. If it is determined that irrigation facilities will be impacted, the applicant will need to provide irrigation improvement plans and enter into an Irrigation Improvements Agreement for the required irrigation facility modifications. There is a TID Board approved time and material fee associated with this review.
- 20. The owner/developer must apply for a facility change for any pole or electrical facility relocation. Facility changes are performed at developer's expense.
- 21. A pipeline is located along the east side of the project. It appears the first 180± feet of this pipeline north of Keyes Road is located close to the property line. The remainder is located

about 15 feet east of the property line on the adjacent parcel (045-045-007) that this pipe serves. This pipeline must be protected at all times during the construction of the proposed drainage basin along Keyes Road. No heavy equipment can operate over, or immediately adjacent to this pipeline.

**Keyes Community Services District (KCSD)**

22. All water service lines and sewer connections must be installed to KCSD standards and according to plans approved by the KCSD, at the expense of the owner.
23. All applicable KCSD connections, facilities, and inspection fees must be paid upon application for connections.
24. The owner must comply with all District rules and regulations.
25. This will-serve commitment will expire on July 31, 2016, unless construction has commenced by that date.
26. The "Will-Serve Letter" is valid only upon approval by the Stanislaus County Local Agency Formation Commission (LAFCO).

**Stanislaus County Local Agency Formation Commission (LAFCO)**

27. LAFCO approval must be obtained prior to the extension of water and/or sewer services by the KCSD to serve the project.

**California Regional Water Quality Control Board (RWQCB)**

28. Prior to construction, the developer shall be responsible for contacting the California Regional Water Quality Control Board to determine if any of the following are required: a Construction Storm Water General Permit; a Storm Water Pollution Prevention Plan (SWPPP); a Phase I and II Municipal Separate Storm Sewer System (MS4) Permit; an Industrial Storm Water General Permit; a Clean Water Act Section 404 Permit; a Clean Water Act Section 401 Permit-Water Quality Certification; or Waste Discharge Requirements (WDR). If a SWPPP is required, it shall be completed prior to construction and a copy shall be submitted to the Stanislaus County Department of Public Works.

**San Joaquin Valley Air Pollution Control District (SJVAPCD)**

29. The proposed project may be subject to District Rules and Regulations, including Regulation VIII (Fugitive PM10 Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving, and Maintenance Operations). The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance office. Current District rules can be found online at: [www.valleyair.org/rules/1ruleslist.htm](http://www.valleyair.org/rules/1ruleslist.htm).

**MITIGATION MEASURES**

**(Pursuant to California Public Resources Code 15074.1: Prior to deleting and substituting for a mitigation measure, the lead agency shall do both of the following: 1) Hold a public hearing to consider the project; and 2) Adopt a written finding that the new measure is equivalent or more effective in mitigating or avoiding potential significant effects and that it in itself will not cause any potentially significant effect on the environment.)**

30. New multi-story development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.
31. The applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for Highway Commercial per the Keyes community Plan adopted on April 18, 2000. The fees were calculated in 2003 at \$751.47 per 1,000 square-feet of floor space. With the fees adjusted for inflation using the Engineering News-Record index, the July 2015 fees are \$1137 per 1,000 square feet. These fees will be paid prior to building permit issuance.

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

**KEYES COMMUNITY SERVICES DISTRICT  
5601 7<sup>TH</sup> STREET  
P O BOX 699  
KEYES, CA 95328**

July 14, 2015

Justin Capp  
1405 8<sup>th</sup> Street  
Modesto, CA 95354

Re: Will Serve Letter Request For 4346 Jessup Rd, Keyes, CA 95328  
APN 045-045-024

Dear Mr. Capp:

The Keyes Community Services District is willing to provide the requested water and sewer service on the following conditions:

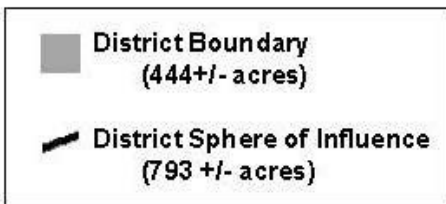
1. All water service lines and sewer connections must be installed to District standards and according to plans approved by the District, at the expense of the owner.
2. All applicable District connection, facilities and inspection fees must be paid upon application for connections.
3. The owner must comply with all District rules and regulations.
4. This will-serve commitment will expire on July 31, 2016 unless construction has commenced by that date.

Sincerely,



Ernie Garza  
General Manager  
By: Michelle Harris

# Keyes Community Services District Boundary & Sphere of Influence



Source: LAFCO Files, July 2014





## CEQA INITIAL STUDY

Adapted from CEQA Guidelines APPENDIX G Environmental Checklist Form, Final Text, December 30, 2009

1. **Project title:** Use Permit Application No. PLN2015-0068 - A.L. Gilbert Co. (SCH No. 2015082043)
2. **Lead agency name and address:** Stanislaus County  
1010 10<sup>th</sup> Street, Suite 3400  
Modesto, CA 95354
3. **Contact person and phone number:** Timothy Vertino, Assistant Planner  
(209) 525-6330
4. **Project location:** 4346 Jessup Road, east of Faith Home Road, west of Highway 99, in the Keyes area. APN: 045-045-024.
5. **Project sponsor's name and address:** Kevin Bennett, Justin W. Capp, Inc.  
1405 8<sup>th</sup> Street  
Modesto, CA 95354
6. **General Plan designation:** P-D (Planned Development)
7. **Zoning:** A-2-10 (General Agriculture)
8. **Community Plan:** P-I (Planned Industrial)
9. **Description of project:**

Request to construct a 37-foot high, 60,000 square foot warehouse with a 6,240 square foot canopy, on a 15± acre parcel. The warehouse will be used to store raw materials (feed and seed) waiting to be processed at 4431, and 4367 Jessup Road where the product is manufactured and packaged as bulk dairy feed. The project site is presently undeveloped land which has been used for truck parking. The project site takes access on to Jessup Road, and through a private road which extends beyond Jessup Road. The Jessup Road entrance includes a truck scale, equipped with a traffic control light. The project proposes a future rail dock and extension of the existing rail line across Jessup Road, to accommodate the proposed warehouse.

10. **Surrounding land uses and setting:** A.L. Gilbert's manufacturing facility to the north; Keyes Community Service District facility corporation yard, and warehouses to the west; Keyes Road, and agricultural crops to the south; A.L. Gilbert storage site, agricultural crops, State Highway 99, and Union Pacific Railroad to the east.
11. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** Building Permits Division  
Department of Environmental Resources  
Department of Public Works  
Keyes Municipal Advisory Council  
Regional Water Quality Control Board  
San Joaquin Valley Air Pollution Control District

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

**DETERMINATION: (To be completed by the Lead Agency)**

On the basis of this initial evaluation:

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

Timothy Vertino  
Signature

October 29, 2015  
Date



**EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

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

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

**ISSUES**

I. AESTHETICS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		X		

**Discussion:** The project site is bordered by Keyes Road to the south, and State Route (SR) 99 to the east, in the unincorporated community of Keyes, just north-west of the Keyes Road Overpass and the southbound SR 99 on and off ramps. The project site is designated as Planned Industrial within the Keyes Community Plan boundaries.

The site itself is not considered to be a scenic resource or a unique scenic vista. The proposed warehouse has a maximum height of 37± feet. Operating hours are Monday thru Friday, 6:00 a.m. to 6:00 p.m. Because the proposed warehouse will close by 6:00 p.m., the impact from lighting is expected to be less than significant. According to the Keyes Community Plan the County shall review new multi-story development in Planned Industrial areas to ensure that reflective surfaces would not result in glare along roadways. Improvements to the site will result in a new source of substantial light and glare which could adversely affect day and/or nighttime views in the area. Mitigation measures have been added to reduce illumination impacts to less than significant. *Keyes MMRP Mitigation Measures No. 16 on Page 18 of the MMRP.*

**Mitigation:**

1. *New multi-story development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.*

**References:** Application information; Keyes Community Plan, EIR and MMRP adopted April, 2000; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>.

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X	

**Discussion:** The project site has soils classified by the Farmland Mapping and Monitoring Program as being Prime Farmland and Urban and Built-Up Land. The project site is currently undeveloped, but was previously planted in row crops, which can be seen most recently on site in 2010. The project site is currently zoned A-2-10 (General Agriculture), a Tier One Use Permit allows agricultural warehouses on agriculturally zoned land.

According to the Keyes Community Plan, Industrial and Planned Industrial land uses west of State Route 99 are buffered from sensitive land uses to the east of the highway. Industrial and Planned Industrial uses are afforded direct access to heavy rail service, and vital regional north-south. This project will have no impact to forest land or timberland.

Lands within the Keyes Community Plan area, with a General Plan of Agriculture are subject to farmland mitigation upon submittal of a General Plan Amendment/Rezone application. Because the project site is within the Keyes Community Plan area already designated as Planned Industrial and designated as Planned Development in the County General Plan, it is not subject to the Keyes Community Plan's one to one [acre] farmland mitigation. If the project site is rezoned in the future from Agriculture to another zoning district, the applicant may be held to the one to one [acre] farmland mitigation measures. *Keyes MMRP Mitigation Measures Nos. 4.1-1 and 4.1-4 on Page 4 of the MMRP.*

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April 2000; Stanislaus County G.I.S. 2010 aerial image; State of California Department of Conservation Farmland Mapping and Monitoring Program-Stanislaus County Farmland 2010 [ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sta14\\_no.pdf](ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sta14_no.pdf); and the Stanislaus County General Plan and Support Documentation<sup>1</sup>.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?				X

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

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

Potential impacts on local and regional air quality are anticipated to be less than significant, falling below SJVAPCD thresholds, as a result of the nature of the proposed project and project’s operation after construction. Implementation of the proposed project would fall below the SJVAPCD significance thresholds for both short-term construction and long-term operational emissions, as discussed below. Because construction and operation of the project would not exceed the SJVAPCD significance thresholds, the proposed project would not increase the frequency or severity of existing air quality standards or the interim emission reductions specified in the air plans.

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

Construction activities associated with new development can temporarily increase localized PM10, PM2.5, volatile organic compound (VOC), nitrogen oxides (NOX), sulfur oxides (SOX), and carbon monoxide (CO) concentrations a project’s vicinity. The primary source of construction-related CO, SOX, VOC, and NOX emission is gasoline and diesel-powered, heavy-duty mobile construction equipment. Primary sources of PM10 and PM2.5 emissions are generally clearing and demolition activities, grading operations, construction vehicle traffic on unpaved ground, and wind blowing over exposed surfaces.

This project has been referred to SJVAPCD, but no response has been received to date.

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April 2000; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

**Discussion:** The project site is currently cleared, undeveloped land. This project was referred to the State of California Department of Fish and Wildlife, and the US Department of Fish and Wildlife, but no referral responses have been received to date.

There is no evidence to suggest that this project would result in impacts to sensitive and endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors. There are no known sensitive or protected species or natural communities located on the site and/or in the surrounding area. The project will not conflict with a Habitat Conservation Plan, a Natural Community Conservation Plan, or other locally approved conservation plans. *Keyes MMRP Mitigation Measures Nos. 4.2-2(a) and 4.2-5 on Pages 5-8 of the MMRP.*

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April, 2000; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** It does not appear this project will result in significant impacts to any archaeological or cultural resources. The project was referred to the Native American Heritage Commission (NAHC) which responded with recommendations and procedures in regards to the discovery of archaeological or cultural resources. A condition of approval will be placed on the project that requires that if any resources are found, construction activities will halt at that time and investigated further.

**Mitigation:** None.

**References:** California Building Code; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** As contained in Chapter Five of the General Plan Support Documentation, the areas of the County subject to significant geologic hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required as part of the building permit process. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. Any structures resulting from this project will be designed and built according to building standards appropriate to withstand shaking for the area in which they are constructed. Any earth moving is subject to Public Works Standards and Specifications which consider the potential for erosion and run-off prior to permit approval. Likewise, any addition of a septic tank or alternative waste water disposal system would require the approval of the Department of Environmental Resources (DER) through the building permit process, which also takes soil type into consideration within the specific design requirements.

The project was referred to the Department of Public Works and the Building Permits Division. Both Departments responded with comments to address these concerns and will be incorporated into the project as conditions of approval and/or development standards. Previously identified as *Keyes MMRP Mitigation Measures No. 1 on Page 14 of the MMRP*.

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April, 2000; Stanislaus County General Plan and Support Documentation<sup>1</sup>

VII. GREENHOUSE GAS EMISSIONS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	

<b>b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</b>			<b>X</b>	
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**Discussion:** The principal Greenhouse Gasses (GHGs) are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H<sub>2</sub>O). CO<sub>2</sub> is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO<sub>2</sub> equivalents (CO<sub>2</sub>e). In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] No. 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. As a requirement of AB 32, the ARB was assigned the task of developing a Climate Change Scoping Plan that outlines the state’s strategy to achieve the 2020 GHG emissions limits. This Scoping Plan includes a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state’s dependence on oil, diversify the state’s energy sources, save energy, create new jobs, and enhance public health. The Climate Change Scoping Plan was approved by the ARB on December 22, 2008. According to the September 23, 2010, AB 32 Climate Change Scoping Plan Progress Report, 40 percent of the reductions identified in the Scoping Plan have been secured through ARB actions and California is on track to its 2020 goal.

The proposed use estimated a maximum of six (6) and a minimum of four (4) employees per shift, and an estimated 20 daily customers/visitors on site during peak time. The proposed use also estimated 75 truck deliveries per day.

The proposed project would result in short-term emissions of GHGs during construction. These emissions, primarily CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, are the result of fuel combustion by construction equipment and motor vehicles. The other primary GHGs (HFCs, PFCs, and SF<sub>6</sub>) are typically associated with specific industrial sources and are not expected to be emitted by the proposed project. As described above in Section III - Air Quality, the use of heavy-duty construction equipment would be very limited; therefore, the emissions of CO<sub>2</sub> from construction would be less than significant.

The project would also result in direct annual emissions of GHGs during operation. Direct emissions of GHGs from operation of the proposed project are primarily due to passenger vehicles and truck trips. This project would not result in emission of GHGs from any other sources. Consequently, GHG emissions are considered to be less than significant.

**Mitigation:** None.

**References:** Application information; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

<b>VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Included</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<b>a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</b>			<b>X</b>	
<b>b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</b>			<b>X</b>	
<b>c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</b>				<b>X</b>
<b>d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</b>				<b>X</b>

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

**Discussion:** DER’s Hazardous Materials Division is responsible for overseeing hazardous materials, and requested a Phase 1 study be submitted prior to the issuance of a grading permit. The applicant submitted a Phase 1 Study dated December 3, 2007, which has been sent to the Hazardous Materials Division, which responded that the report is sufficient.

The Envirostor database was accessed to determine if any of the properties were listed as potential hazardous waste or superfund sites. 4346 Jessup Road was not identified as a hazardous site.

**Mitigation:** None.

**References:** Applicant email dated September 14, 2015; Department of Toxic Substances Control (<http://www.envirostor.dtsc.ca.gov>); Stanislaus County General Plan and Support Documentation<sup>1</sup>

IX. HYDROLOGY AND WATER QUALITY -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?				X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				X
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
f) Otherwise substantially degrade water quality?				X



<b>g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?</b>				<b>X</b>
<b>h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?</b>				<b>X</b>
<b>i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?</b>				<b>X</b>
<b>j) Inundation by seiche, tsunami, or mudflow?</b>				<b>X</b>

**Discussion:** Run-off is not considered an issue because of several factors which limit the potential impact. These factors include the relatively flat terrain of the subject site, and relatively low rainfall intensities in the Central Valley. Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act. The project site itself is located in Zone X (outside the 0.2% floodplain) and, as such, exposure to people or structures to a significant risk of loss/injury/death involving flooding due levee/dam failure and/or alteration of a watercourse, at this location is not an issue with respect to this project.

By virtue of the proposed paving for the building pads, parking, and driveways, the current absorption patterns of water upon this property will be altered; however, current standards require that all of a project's storm water be maintained on site and, as such, a Grading and Drainage Plan will be included in this project's conditions of approval. As a result of the development standards required for this project, impacts associated with drainage, water quality, and runoff are expected to have a less than significant impact. This project was referred to the Regional Water Quality Control Board (RWQCB) which responded with standards of development and requirements that will be incorporated into this project's conditions of approval. The Department of Public Works reviewed the project and responded with a condition regarding intersection impact fees, indicating that standard conditions of approval, in regards to grading and drainage, encroachment permits, and improvement plans, would be forthcoming. *Keyes MMRP Mitigation Measures Nos. 2 thru 6 on Page 15 and 16 of the MMRP.*

The project was referred to the Keyes Municipal Advisory Council and a response has not been received by the time this initial study was drafted.

**Mitigation:** None.

**References:** Applicant email received September 17, 2015; Keyes Community Plan, EIR and MMRP adopted April, 2000; Referral Response from the Regional Water Quality Control Board dated August 28, 2015; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** The project site is zoned A-2-10 (General Agriculture), the General Plan designation is P-D (Planned Development), and the Keyes Community Plan designation for this site is P-I (Planned Industrial). The proposed warehouse is consistent with the Planned Development General Plan designation, and A-2-10 (General Agriculture) zoning of the site. This application is for a "use" that is considered a Tier One use which is permitted by securing a Use Permit. The proposed warehouse is seen as an Agricultural use because it is being used for the storage of feed and

seed. Any future re-use of this warehouse may require a Rezone application to allow other uses of the warehouse that are not agriculture related. The features of this project will not physically divide an established community and/or conflict with any habitat conservation plan or natural community conservation plan. This project is not known to conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project.

**Mitigation:** None.

**References:** Stanislaus County Zoning Ordinance; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** The location of all commercially viable mineral resources in Stanislaus County has been mapped by the State Division of Mines and Geology in Special Report 173. There are no known significant resources on the site.

**Mitigation:** None.

**References:** Stanislaus County General Plan and Support Documentation<sup>1</sup>

XII. NOISE -- Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

**Discussion:** Noise impacts associated with project activities and traffic are not anticipated to exceed the normally acceptable level of noise. The adjacent parcels to the north of the project site are an industrial manufacturing facility. The proposed 60,000 square foot warehouse will serve as an ancillary storage site for the existing manufacturing facility. The site itself is impacted by the noise generated from existing manufacturing facility to the north, and nearby SR 99 and the

Union Pacific railroad. The project purposes an extension of the private railroad track that exists across Jessup Road. The purpose is to transport goods from one site to the other, which may cause less than significant noise impacts in the overall area. The site is not located within an airport land use plan. *Keyes MMRP Mitigation Measures No. 14 on Page 17 of the MMRP.*

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April, 2000; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** The proposed use of the site may induce modest growth in the area by creating service extensions and/or new infrastructures in the form of Keyes Community Services District extension of water and sewer services. Extension of such services must be approved by Stanislaus County LAFCO. No housing or persons will be displaced by the project. This project is adjacent to agricultural, and industrial operations and the nature of the use is considered consistent with the A-2 zoning district.

**Mitigation:** None.

**References:** Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** The County has adopted Public Facilities Fees, as well as one for the Fire Facility Fees on behalf of the appropriate fire district, to address impacts to public services. Such fees are required to be paid at the time of building permit issuance. The project was referred to Keyes Union, and Turlock Joint Union High School Districts, the Keyes Fire Department, and the Stanislaus County Environmental Review Committee (ERC) which includes the Sheriff's Department. Conditions of approval will be added to this project to insure that the warehouse will comply with all applicable fire

department standards with respect to access and water for fire protection. The project was referred to the ERC, the Modesto Regional Fire Authority, and the Keyes Fire Department. *Keyes Community Plan Mitigation Measure Nos. 15 and 18 on pages 17 and 18 of the MMRP addresses this on a Community-wide basis.* A condition of approval may be added to this project requiring compliance with these mitigation measures which requires all new development pay a fair share towards fire protection and parks.

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April, 2000; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

**Discussion:** The proposed project does not have a residential component and is not anticipated to significantly increase demand on recreational facilities. A condition of approval may be added to the project requiring compliance with this mitigation measure which requires all new development pay a fair share towards parks. *Keyes MMRP Mitigation Measures No. 18 on Page 18 of the MMRP addresses this on a Community-wide basis.*

**Mitigation:** None.

**References:** Keyes Community Plan, EIR and MMRP adopted April, 2000; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

e) Result in inadequate emergency access?				X
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X

**Discussion:** Significant impacts to traffic and transportation infrastructure were not identified by reviewing agencies. The project site and surrounding parcels, including the manufacturing facility, have access via County-maintained Jessup Road, and through a private road extending to the east past Jessup Road.

The proposed use estimates 75 truck deliveries per day, however the proposed number of deliveries per day would not increase traffic to the area as the same number of vehicles currently pick up their shipments at the 'Berry Feed & Seed' plant directly across Jessup Road. These vehicles will now pick up their supply at the project site as instead of the 4431 Jessup plant. The proposed use estimated a maximum of six (6) and a minimum of four (4) employees per shift, and an estimated 20 daily customers/visitors on site during peak time. The project proposes a future extension of a rail line east of the warehouse, which currently serves the A.L. Gilbert facility to the north.

A component of the proposed warehouse is the installation of an in and out truck scale and house at the site entrance off the Jessup Road cul-de-sac. The truck scale is proposed with a traffic control light, for the purpose of avoiding truck traffic getting backed up into Jessup Road. Public Works has commented that the outbound traffic scale be opened up to accommodate for trucks waiting in the Jessup Road right of way, to reduce on street traffic.

The Department of Public Works responded with the applicant's fair share amount, as determined by the Keyes Community Plan and updated for inflation. The fair share fees have been added as a mitigation measure. Moreover, current Public Facility Fees (PFF) will be imposed when the project applies for building permits. *Keyes Community Plan MMRP Mitigation Measure Nos. 4.3-1 (et.al), 4.3-2 (et.al), and 4.3-3 (et.al.) on pages 8-10.*

The project was also referred to Caltrans for review, but no comments were received to date.

2. **Mitigation:** *The applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for Planned Industrial per the Keyes community Plan adopted on April 18, 2000. The fees were calculated in 2003 at \$465.20 per acre. With the fees adjusted for inflation using the Engineering News-Record index, the July 2015 fees are \$703.85 per acre. The fees for 15 acres is \$10,557.71 these fees will be paid prior to building permit issuance.*

**References:** Application information; Keyes Community Plan, EIR and MMRP adopted April, 2000; Referral response from the Department of Public Works dated September 29, 2015; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

**Discussion:** Limitations on providing services have not been identified. Currently the site is not served by municipal services (sewer & water), however, the applicant is proposing to have the site served by the Keyes Community Service District (CDS) the provider of sewer and water for this community. The Keyes CSD provided a letter stating that they are capable of providing water and sewer services to the project site. LAFCO has requested that the site be approved for annexation prior to the extension of water and/or sewer services by the Keyes Community Service District to serve the project. These requirements will be reflected in the project's conditions of approval. These requirements will be reflected in the project's conditions of approval/development standards. *Keyes Community Plan MMRP Mitigation Measure Nos. 2, 3, 4, and 6 on page 15.*

Turlock Irrigation District (TID) has submitted a referral letter stating that a TID pipeline that is located on the west side of the parcel will need to be removed and its connection to the main pipeline be unplugged on the south side of Keyes Road. A second TID pipeline runs along the southern part of the parcel near Keyes Road, this pipeline will need to be protected at all times during the construction of the drainage basin along Keyes Road, and that no heavy equipment can operate over, or immediately adjacent to the pipeline. TID has also commented that if the property will no longer irrigate or have direct access to water must apply for abandonment for the parcel from the district. TID commented that developed property adjoining irrigated ground must be graded so that finished grading elevations are at least 6 inches higher than irrigated ground. TID also commented that a protective berm must be installed to prevent irrigation water from reaching non-irrigated properties.

The applicant has submitted an email from TID stating that the two existing pipelines can remain in place as long as they are protected, and no construction is adjacent to them, that they can remain in place. The applicant has also stated that the proposed grading is greater than 6 inches above the irrigated ground.

**Mitigation:** None.

**References:** Applicant email dated September 30, 2015; Referral response from Turlock Irrigation District dated September 29, 2015; "Will Serve Letter" from the Keyes Community Services District dated July 14, 2015; Referral response from LAFCO dated September 1, 2015; and the Stanislaus County General Plan and Support Documentation<sup>1</sup>

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

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	
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**Discussion:** Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area.

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<sup>1</sup>Stanislaus County General Plan and Support Documentation adopted in October 1994, as amended. Optional and updated elements of the General Plan and Support Documentation: **Agricultural Element** adopted on December 18, 2007; **Housing Element** adopted on August 28, 2012; **Circulation Element** and **Noise Element** adopted on April 18, 2006.

## MITIGATED NEGATIVE DECLARATION

**NAME OF PROJECT:** Use Permit Application No. PLN2015-0068 – A.L. Gilbert Co.  
(SCH No. 2015082043)

**LOCATION OF PROJECT:** 4346 Jessup Road, east of Faith Home Road, west of Highway 99, in the Keyes area. APN: 045-045-024.

**PROJECT DEVELOPER:** Kevin Bennett  
Justin W. Capp Inc.  
1405 8<sup>th</sup> Street  
Modesto, CA 95354

**DESCRIPTION OF PROJECT:** Request to construct a 37-foot high, 60,000 square-foot warehouse with a 6,240 square-foot canopy, on a 15± acre parcel in the A-2-10 (General Agriculture) zoning district. The project site is located at 4346 Jessup Road, east of Faith Home Road, west of Highway 99, in the Keyes area.

Based upon the Initial Study, dated **October 30, 2015**, the Environmental Coordinator finds as follows:

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

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

1. *New multi-story development shall minimize the use of reflective surface and have those reflective surfaces which are used to be oriented in such a manner so as to reduce glare impacts along roadways.*
2. *The applicant shall pay the Keyes Community Plan Mitigation Funding Program fees for Planned Industrial per the Keyes community Plan adopted on April 18, 2000. The fees were calculated in 2003 at \$465.20 per acre. With the fees adjusted for inflation using the Engineering News-Record index, the July 2015 fees are \$703.85 per acre. The fees for 15 acres are \$10,557.71 these fees will be paid prior to building permit issuance.*

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

Initial Study prepared by: Timothy Vertino, Assistant Planner

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



**SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS**

**PROJECT:USE PERMIT APPLICATION NO. PLN2015-0068 - A.L. GILBERT CO.**

REFERRED TO:	RESPONDED			RESPONSE			MITIGATION MEASURES		CONDITIONS			
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
CA DEPT OF FISH & WILDLIFE	X	X	X		X							
CA DEPT OF TRANSPORTATION DIST 10	X	X	X		X							
CA OPR STATE CLEARINGHOUSE	X	X	X		X							
CA RWQCB CENTRAL VALLEY REGION	X	X	X	X				X		X	X	
CA STATE LANDS COMMISSION	X	X	X		X							
COMMUNITY SERVICE/SANITARY DISTRICT: KEYES	X	X	X		X							
COOPERATIVE EXTENSION	X	X	X		X							
FIRE PROTECTION DIST: KEYES	X	X	X		X							
IRRIGATION DISTRICT: TURLOCK	X	X	X	X				X		X	X	
MOSQUITO DISTRICT: TURLOCK	X	X	X		X							
MOUNTAIN VALLEY EMERGENCY MEDICAL SERVICES	X	X	X		X							
MUNICIPAL ADVISORY COUNCIL: KEYES	X	X	X		X							
PACIFIC GAS & ELECTRIC	X	X	X		X							
POSTMASTER: KEYES	X	X	X		X							
RAILROAD: UNION PACIFIC	X	X	X		X							
SAN JOAQUIN VALLEY APCD	X	X	X	X				X		X	X	
SCHOOL DISTRICT 1: KEYES UNIFIED	X	X	X		X							
SCHOOL DISTRICT 2: TURLOCK JOINT	X	X	X		X							
STAN CO AG COMMISSIONER	X	X	X		X							
STAN CO BUILDING PERMITS DIVISION	X	X	X	X				X		X	X	
STAN CO CEO	X	X	X		X							
STAN CO DER	X	X	X	X				X		X		X
STAN CO ERC	X	X	X	X				X		X		X
STAN CO HAZARDOUS MATERIALS	X	X	X	X				X		X	X	
STAN CO PUBLIC WORKS	X	X	X	X				X	X		X	
STAN CO SHERIFF	X	X	X		X							
STAN CO SUPERVISOR DIST 2:CHIESA	X	X	X		X							
STAN COUNTY COUNSEL	X	X	X		X							
STANISLAUS FIRE PREVENTION BUREAU	X	X	X		X							
STANISLAUS LAFCO	X	X	X	X				X			X	
SURROUNDING LAND OWNERS	X	X	X									
TELEPHONE COMPANY: ATT	X	X	X		X							
US MILITARY	X	X	X									
USDA NRCS	X	X	X		X							