

# STANISLAUS COUNTY PLANNING COMMISSION

April 3, 2025

## STAFF REPORT

USE PERMIT APPLICATION NO. PLN2023-0134  
LUCKY STAR LOGISTICS, INC.

**REQUEST: TO PERMIT AN EXISTING TRACTOR-TRAILER PARKING FACILITY FOR UP TO TWELVE TRACTOR AND TRAILER COMBINATIONS, ON A 1.5-ACRE PORTION OF A 10.3± ACRE PARCEL, IN THE GENERAL AGRICULTURE (A-2-10) ZONING DISTRICT.**

### APPLICATION INFORMATION

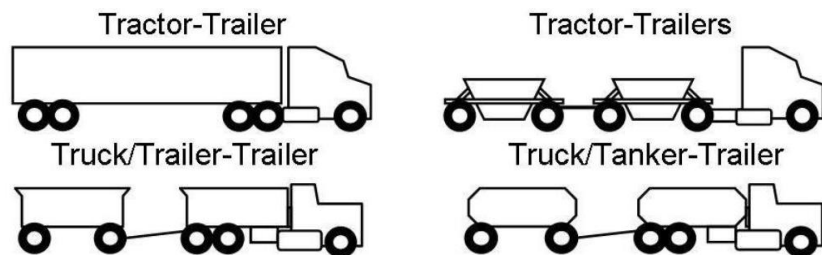
Applicant/Property Owner:	Rajinder Bhullar, Lucky Star Logistics, Inc.
Agent:	N/A
Location:	1005 East Greenway Avenue, south of Highway 99, between Lander Avenue (SR 165) and Golf Road, in the Turlock area.
Section, Township, Range:	26-5-10
Supervisory District:	District 2 (Supervisor Chiesa)
Assessor's Parcel:	044-028-011
Referrals:	See Exhibit H Environmental Review Referrals
Area of Parcel(s):	10.3± acres
Water Supply:	Private well
Sewage Disposal:	Private septic system
General Plan Designation:	Agriculture
Community Plan Designation:	N/A
Existing Zoning:	General Agriculture (A-2-10)
Sphere of Influence:	N/A
Williamson Act Contract No.:	N/A
Environmental Review:	Negative Declaration
Present Land Use:	Single-family dwelling, detached agricultural storage building, detached garage, and irrigated cropland.
Surrounding Land Use:	Scattered rural ranchettes and irrigated cropland in all directions; State Route (SR) 165 and the former Turlock Airpark to the west; SR 99 and City of Turlock to the north; unpermitted truck parking facilities to the south, east, and west; and County of Merced to the south.

**RECOMMENDATION**

Staff recommends the Planning Commission deny 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 the findings and actions required for project approval, which includes use permit findings. Conditions of Approval to be applied in the event of project approval can be found in Exhibit C.

**BACKGROUND**

On April 17, 2012, the Stanislaus County Board of Supervisors adopted amendments to Chapter 21.94 - *Home Occupations* and Chapter 21.20 - *General Agriculture District (A-2)* of the Stanislaus County Zoning Ordinance, to allow tractor-trailer parking in the A-2 zoning district. Specifically, the amendment addressed parking facilities for tractors, trailers, and tractor-trailer combinations with a minimum of five (5) axles, capable of hauling a combined gross vehicle weight of 80,000 pounds (hereafter referred to as “trucks”), as illustrated by the following:



Prior to the ordinance amendments’ adoption in 2012, truck parking in the A-2 zoning district was limited to trucks that were accessory and incidental to permitted agricultural operations, uses that are closely related to agriculture permitted by a Tier One use permit, such as a huller-sheller, or as part of an agriculturally-related business permitted by a Tier Two use permit, such as an agricultural service establishment or agricultural processing facility.

An “agricultural service establishment” is defined as meaning “a business engaging in activities designed to aid production agriculture”. Generally, a trucking business could be considered an agricultural service establishment if exclusively engaged in the transport of raw and unprocessed produce. The transport of processed agricultural goods (e.g. bottled milk, frozen vegetables, cheese, etc.) or goods used in the processing or packaging of processed goods (e.g. cans, boxes, crates, etc.) may be permitted in the A-2 zoning district when accessory to a permitted agricultural processing facility; however, the A-2 zoning district did not provide an allowance for truck parking when not accessory to another on-site permitted use. Accordingly, prior to the 2012 ordinance amendment there were no pathways for permitting general freight trucking businesses who lease parking stalls to individual contract truck operators, or would be operated by an independent trucking business, and who hauled goods other than raw and unprocessed produce from locating in the A-2 zoning district.

The process to initiate the 2012 ordinance amendment began in response to an increase in code enforcement activity which intensified in 2008 when roughly 20 truck parking facilities were reported to the Stanislaus County Department of Environmental Resources (DER) Code

Enforcement Division, and each were given a notice and order to abate. Following these code enforcement efforts, a number of truck operators formed an informal group in order to bring the issues associated with the commercial truck parking before the County. Throughout the ordinance amendment process, residents, landowners, truck drivers, businesses, and County officials provided a variety of feedback on the issue, related to concerns and benefits of truck parking in the A-2 zoning district, which shaped the amendment that was ultimately adopted by the Board of Supervisors. The resulting amendments allowed truck parking in the A-2 zoning district via two permitting pathways:

1. Option one, established Zoning Ordinance Section 21.94.020(J)(4), which allows a maximum of three tractors and three trailers to be parked on any single parcel at least one acre in size, provided all trucks are registered to the occupant, and a home occupation business license is issued by staff to an occupant of a dwelling on an A-2 zoned parcel.
2. Option two, established by Zoning Ordinance Section 21.20.030(G), allows the parking of up to 12 tractors and 24 trailers, provided a use permit is granted by the Planning Commission, subject to limitations that include living on-site, size minimums and maximums for the operation and any office accessory to the operation, onsite improvements, and limits to how the truck parking facility can operate (see Exhibit E - *Tractor-Trailer Parking Excerpt of Zoning Ordinance Section 21.20.030(G) – General Agriculture District (A-2) – Uses Requiring a Use Permit*). Additionally, for truck parking requests via a use permit, the Planning Commission must find, in addition to the general finding required for approval of any use permit, that, “*The establishment [of the use] as proposed will not create a concentration of commercial and industrial uses in the vicinity*”.

Since the ordinance amendment in 2012 to date, the Stanislaus County Planning Department has received 28 use permit applications for truck parking in the A-2 zoning district. The following is the status of those applications:

- Eight applications have been approved by the Planning Commission.
- Zero applications have been denied by the Planning Commission.
- Twelve applications have been withdrawn prior to public hearing due to either inability to meet the established criteria; often due to the business operators not living on-site as required, due to exceeding the number of trucks permitted, or due to costs associated with developing the facilities in accordance with County standards.
- Eight applications are in process to be considered by the Planning Commission.

Of the 28 total applications received, 23 were subject to code enforcement action for unpermitted truck parking facilities, including the subject application.

As of February 2025, there are 26 active code enforcement cases for unpermitted truck parking facilities which have yet to submit any type of application for a land use entitlement to legalize the non-permitted use. Most of the truck parking facilities with active code enforcement cases have a home occupation business license but are operating beyond the scope of the home occupation

allowances for truck parking. Upon an audit of the location of these various truck parking sites associated with code enforcement cases and land use entitlement applications, staff has noted that the majority of these facilities, permitted or otherwise, have developed in the unincorporated areas surrounding Keyes, south and west Turlock, and along major roadways feeding into the State Route 99 corridor.

Due to the increase in cases resulting in complaints about truck parking facilities, the General Plan Update Committee, at a regularly scheduled meeting on December 5, 2024, directed staff to seek formation of an ad hoc committee consisting of members of the County's Board of Supervisors and Planning Commission. On January 16, 2025, the Planning Director formed the ad hoc committee, which is comprised of Supervisor Chiesa and Planning Commissioner Morad. The committee, supported by staff from various County departments, is in the process of researching, conducting public outreach, and developing land use policy recommendations for how to address truck parking in the A-2 zoning district. Any land use policy recommendations developed by the Ad Hoc Committee will be presented to the General Plan Update Committee and Planning Commission for a recommendation to the Board of Supervisors. These recommendations could include amendments to the current ordinances to modify, reduce, or eliminate the allowance, and define what a concentration is. If the County's current allowance for truck parking in the A-2 zoning district is eliminated, the only option to pursue a land use entitlement for those in violation may be a General Plan amendment and rezone.

Since the adopted 2012 ordinance amendment, the County has received five applications for General Plan amendments and rezones of A-2 zoned lands to allow for the legalization or establishment of truck-parking facilities exceeding the 12-truck maximum allowance by Use Permit. At the time this report was written, two applications (General Plan Amendment and Rezone Applications No. PLN2021-0052 – *Pattar Trucking* and No. PLN2024-0016 – *Atwal Properties*) were heard by the Board of Supervisors on December 17, 2024 but were both continued to the August 19, 2025 Board of Supervisors public hearing pending ad hoc committee recommendations. Three applications are still under review and have yet to have any public hearings scheduled.

Lucky Star Logistics, Inc. has been in operation, under the ownership and operation of the applicant, since 2011. The Department of Transportation's Safety and Fitness Electronic Records System states that the company ships interstate, nonhazardous materials, with cargo consisting of dry general freight. The applicant acquired the property in 2023, and the subject truck parking facility was established on the project site that same year without obtaining any land use entitlements. Prior to acquiring the property, the company operated from 1934 Kinser Road in the City of Ceres and 2216 Nickerson Drive in the City of Modesto.

The subject application process was initiated following a code enforcement investigation (CE-23-0452) resulting from a complaint pertaining to the parking of a number of trucks on the property. Additional discussion on the subject project request and the required findings for approval are provided in the *Issues* and *Zoning Ordinance Consistency* sections of this report.

## **PROJECT DESCRIPTION**

The project is a request to permit an existing tractor-trailer parking facility for up to 12 tractor and trailer combinations, on a 1.5-acre portion of a 10.3± acre parcel, in the General Agriculture (A-2-

10) zoning district. The applicant proposes to utilize a 1.5-acre graveled area in the northeast corner of the parcel for the parking of the tractor-trailer combinations. Additionally, the 1.5-acre area will include space for four passenger vehicle parking stalls for employees. Lucky Star Logistics, Inc. has 10 total employed drivers that report to the site between trips; however, a maximum of four employees access the site daily for the pick-up and drop off of personal passenger vehicles and tractor-trailers.

Proposed hours of operation for the on-site office are 8:00 a.m. to 5:00 p.m., seven days a week. Drivers will be able to access the site 24 hours a day, seven days a week. The trucks will transport general dry freight, such as seeds, sweet potatoes, and hay. Up to 10 one-way truck trips and eight one-way passenger vehicle trips per-day are expected. No supply deliveries, loading, or unloading will occur as part of the project. No hauled materials will be brought back to the site. The trucks will be left empty when parked on-site between trips. No fueling, washing, or major tractor-trailer maintenance, nor repairs, fluid changes, or washing will occur on-site. Minor maintenance limited to tire changes, light and windshield wiper replacements, and checking fluids will be conducted on-site. No on-site oil changes are proposed. Approximately 350± square feet of the existing dwelling on-site will be utilized as a home office for the truck parking facility, and the existing 1,920± square-foot detached shop will provide restroom facilities for the employees. The remainder of the parcel will be left undeveloped. No exterior lighting or signage is proposed.

Access to the site is provided via County-maintained East Greenway Avenue. The site has two existing driveways: one paved, 30-foot-wide driveway on the eastern side of the parcel's frontage lined with a four-foot-tall chain link fencing and shrubs along the driveway, which provides access to the single-family dwelling; and one 45-foot-wide gated and graveled driveway lined with redwood trees in the center of the property's frontage, which provides access for the trucks.

The estimated Pavement Condition Index (PCI) for East Greenway Avenue (from Lander Road to Golf Road) is 79, which is considered good. The estimated Pavement Condition Index (PCI) for the nearest cross-street, Golf Road (from Greenway Avenue to Harding Road) is 50, which is considered fair. The PCI for Golf Road from Greenway Avenue to State Route 99 is 62, which is also considered fair. Stormwater will be handled via overland discharge into the on-site gravel and farmland. A six-foot-tall wooden fence is proposed along the northeastern property line to screen the parking area from public view and to prevent trespass. The other boundaries of the parking area are proposed to be enclosed with six-foot-tall chain-link fencing with privacy slats. The existing on-site dwelling is served by an existing domestic well and septic system.

### **SITE DESCRIPTION**

The 10.3± acre project site is located at 1005 East Greenway Avenue, south of Highway 99, between Lander Avenue and Golf Road, in the Turlock area. The site is currently improved with a 1,937± square-foot single-family dwelling, a 1,920± square-foot detached shop, and an 800± square-foot detached garage. Approximately seven acres of the parcel is utilized for irrigated row crops. The applicant has indicated they no longer intend to farm the parcel

The project site is surrounded by scattered rural ranchettes and irrigated cropland in all directions; State Route 165 and the former Turlock Airpark to the west; State Route 99 and City of Turlock to the north; the County of Merced to the south; and multiple unpermitted truck parking facilities to the south, east, and west.

## **ISSUES**

As reflected in the staff recommendation, staff is recommending that the Planning Commission deny this request. The recommendation is based on previous code compliance issues with the site in combination with the community opposition, and improvements needed to accommodate larger trucks requiring roadway/intersection improvements. Below is an overview of the issues considered in staff's recommendation. While staff is recommending denial, conditions of approval have been developed for the Planning Commission's consideration, if the Planning Commission determines to approve the request.

### **Community Opposition**

Community concerns relating to truck parking in the A-2 zoning district have been primarily focused on operations in the Keyes/Turlock area. As required by state law and County policy, notice of this project has been provided to surrounding landowners. Notice of the project was also provided to persons with an interest in the County potentially amending the current truck parking allowances. In response, two letters have been received, one from a neighboring landowner located approximately 0.63 miles southeast of the project site with concerns regarding truck parking in the A-2 zoning district including damage to local roads and converting agricultural land to commercial uses, and another from an interested party that is generally opposed to truck parking operations in Stanislaus County (see Exhibit D - *Correspondence*). As was mentioned in the *Background* section of this report, the County has initiated a process to review existing allowances for truck parking facilities in the A-2 zoning district as a result of community concerns like this one. The ad hoc committee is in the process of working with County staff to research the issue and conduct outreach to various stakeholder groups, which will help inform land use policy recommendations made by the ad hoc committee, which may include amendments to the current ordinances to reduce or eliminate the allowance. While the Board of Supervisors voted to continue the *Pattar Trucking* and *Atwal Properties*, those requests were for general plan amendment and rezone applications which are legislative actions that require a change in land use policy and would have allowed for the conversion of agricultural land to a use otherwise not permitted. In the case of this request, the County's Zoning Ordinance supports the use provided all applicable criteria and findings can be met.

### **Concentration of Commercial Uses**

The subject project is located directly south of the City of Turlock and State Route 99. Within a one-mile radius of the project site, land uses can be characterized primarily by agricultural production and concentrations of ranchettes, with residential uses in the City of Turlock to the north and commercial and industrial development along Golden State Boulevard to the northeast. Within the south Turlock area, and within a 1.5-mile radius of the project site, there are 15 truck parking facilities that have been documented as of 2024. These facilities include one approved truck parking facility permitted to park up to 12 tractor-trailer combinations, located approximately 0.32 miles or two parcels to the west (Use Permit No. PLN2016-0029 – *Grewal Truck Parking*); nine unpermitted truck parking facilities (of which one has submitted an application for a use permit to park up to 12 tractor-trailer combinations in review under Use Permit Application No. PLN2024-0084 – *Jasson Trucking*) to the west, south and east; five facilities with home occupation business licenses permitted to park up to three tractor-trailer combinations (with one having been cited by code enforcement for having more than the three combinations allowed);

and one facility north of State Route 99 located in the Industrial (M) zoning district. As mentioned in the *Background* and *Zoning Ordinance Consistency* sections of this report, one of the required findings to approve a use permit application is that approval of the use “will not create a concentration of commercial and industrial uses in the vicinity.” However, the definition of a concentration is not defined in the County’s Zoning Ordinance and, as such, the Planning Commission has discretion to apply a standard on a case-by-case basis. In this case only one of the 15 truck parking facilities located within a 1.5-mile radius of the project site is currently permitted and operating in compliance. The Planning Commission has the discretion as to what constitutes a concentration in this case, including whether a concentration includes only approved facilities or unpermitted ones as well (see Exhibit B-8 – *Maps and Site Plan*).

### Size of the Parking Area

As was discussed in the *Background* section, the A-2 zoning ordinance allows the parking of up to 12 tractor-trailer combinations provided a use permit is obtained and criteria pursuant to County Zoning Ordinance Section 21.20.030(G) are met, which includes that the total area of the parcel used for the parking operation is limited to a maximum of one and one-half acres in size or 50 percent of the parcel, whichever is smaller. In determining the acreage dedicated to the parking area, staff has included driveways used by trucks to access the parking area in this calculation. In this case, the proposed graveled parking area, including the driveway, is 2.05± acres in size (see Exhibit B-6 – *Maps and Site Plan*); however, the area includes the eastern side of the parcel which has been paved with asphalt and has been used for truck parking in the past. The applicant has stated that this parking area is no longer in use, and if approved, the project would conform to the parking area dimensions on the site plan thus meeting the maximum area for truck parking. Staff has added Condition of Approval No. 16(e) to require the area graveled and graded for the parking area to be no larger than 1.5 acres in size, including the driveway. The Planning Commission has discretion to determine whether or not driveways are to be included in the calculation of the total parking area.

### Existing Unpermitted Uses of the Site

This application was submitted as a result of Code Enforcement action following complaints received for the unpermitted parking being established on the parcel without the necessary land use permits (Code Enforcement Case No. CE-23-0452).

The applicant has an active City of Turlock business license for Greenway Truck and Trailer Repair Inc., a mobile business offering roadside repair services. During review of the project, staff identified a website (<https://greenwaytruckrepair.com/>) associated with the business advertising 1005 Greenway, the project site, as the location of the business. While the website does not specifically identify repair services being offered on the project site, the website does clearly identify the business location by address. The applicant has no Stanislaus County business license and the only business that would be permitted at this time would be a home occupation. The business will also need to meet the provisions of a home occupation business license as outlined in Chapter 21.94 of the County’s Zoning Ordinance, such as only occupants of the dwelling being engaged in the business on-site, no advertising being allowed which depicts the address of the business, the area used for the business not exceeding twenty percent of the habitable floor area of the principal dwelling, and no repair activities occurring on-site. Condition of Approval No. 11 has been added to the project to reflect these requirements.

### Surface Transportation Assistance Act (STAA) Access

The applicant has indicated the trucks currently parking on the site and proposed to be parked on the property are trucks which meet the threshold of Surface Transportation Assistance Act (STAA) requirements, which are trucks that, due to exceed length, height, weight, width, and other dimensions which correspond with a larger turning radius, are limited to traveling on state highways, and local roads which are designated as approved STAA access routes based on accommodating necessary turn-arounds and turning movements to safely facilitate truck traffic to and from a site to the freeway. This item was originally scheduled to be considered by the Planning Commission at a public hearing on March 20, 2025 but was continued to provide staff time to engage in discussions with Public Works and Caltrans regarding the process and requirements for approval of STAA access routes. The process to establish new STAA access routes involves analysis of proposed routes from the end destination to other STAA approved roadways, which includes evaluating turning movements at intersections and off- and on-ramps to determine if turning movements can be safely made without trucks intervening into oncoming lanes or on private property. If turning movements cannot safely be made, incompatible intersections may require upgrades such as restriping, road widening, relocation of street improvements such as lights, power poles, or signage, and in some cases, require dedication of property to accommodate these changes and provide more room for turns. In the case where dedication is necessary to upgrade a route to STAA-rating, the County would need to initiate the process and make a finding that requiring dedication serves the public good.

Based on Greenway Avenue not being a designated STAA access route, Conditions of Approval Nos. 17 and 18 have been added to the project addressing STAA requirements. No vehicles exceeding the legal limits with respect to length, weight, width, height, or overhang of the California Vehicle Code or Stanislaus County Code will be permitted to travel to and from the project site without the required approvals from all affected agencies, which will require an assessment of turning movements along the proposed route and possible need to widen, modify, and improve intersections to ensure STAA standards are met. All existing parking of STAA rated vehicles, those currently parked onsite, will be required to cease within 30 days of project approval. STAA vehicles may not be parked onsite until after receiving a Staff Approval permit from the Planning and Community Development Department along with approval of a STAA access route from Public Works and Caltrans. Road improvement modifications or dedications needed to upgrade Greenway Avenue to approved STAA access have not been identified but could render development of the parking facility to serve STAA trucks financially infeasible. Although this was pointed out to the applicant, they requested to proceed with the project. However, if dedication of property not owned by the project applicant were to be required to establish a STAA approved route, it would be up to the project applicant to obtain the right of way dedication.

No other project specific issues have been identified as a part of this request, and standard conditions of approval have been added to the project.

### **GENERAL PLAN CONSISTENCY**

Consistency with the goals, objectives, and policies of the various elements of the Stanislaus County General Plan must be evaluated when processing all discretionary project requests. The site is currently designated "Agriculture" in the Stanislaus County General Plan. The agricultural



designation recognizes the value and importance of agriculture by acting to preclude incompatible urban development within agricultural areas. This designation establishes agriculture as the primary use in land so designated, but allows dwelling units, limited agriculturally related commercial services, agriculturally related light industrial uses, and other uses which by their unique nature are not compatible with urban uses, provided they do not conflict with the primary use.

The Stanislaus County General Plan Sphere of Influence policy states that development which requires discretionary approval and is outside the sphere of influence of cities, but is located within one mile of a city's adopted sphere of influence, and within a city's adopted general plan area, shall be referred out to the city for consideration. However, the County reserves the right for final discretionary action. The project site is located within the City of Turlock's General Plan boundaries and within one mile of their Sphere of Influence. Accordingly, the project was referred to the City of Turlock, and no response has been received to date.

To minimize conflicts between agriculture operations and non-agricultural operations, Buffer and Setback Guidelines (Appendix A of the Agricultural Element) have been adopted. The purpose of these guidelines is to protect the long-term health of local agriculture by minimizing conflicts resulting from normal agricultural practices as a consequence of new or expanding uses approved in or adjacent to the General Agriculture (A-2) zoning district.

Appendix A of these guidelines states that all projects shall incorporate a minimum 150 foot-wide buffer setback, or a 300-foot-wide buffer setback for people intensive outdoor activities, such as athletic fields; parking lots are a permitted use within the buffer area. Parking is a permitted use within the agricultural buffer and as this request is for an unmanned parking facility and involves no construction, unless otherwise determined by the Planning Commission, the project is not subject to agricultural buffers. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date.

Staff believes that with conditions of approval in place, the project is consistent with the County's General Plan.

### **ZONING ORDINANCE CONSISTENCY**

The site is currently zoned General Agriculture (A-2-10). In accordance with Section 21.20.030(G) of the Stanislaus County Zoning Ordinance, the parking of tractor-trailer combinations may be allowed in the General Agriculture (A-2) zoning district if a use permit is first obtained. In order to approve the use permit, the Planning Commission must make the following findings:

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

agricultural use of other property in the vicinity.

3. The establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity.

In addition to these required findings, the project must also meet project site and operations related requirements listed in Section 21.20.030(G)(3) of the A-2 Zoning Ordinance (see Exhibit E - *Tractor-Trailer Parking Excerpt of Zoning Ordinance Section 21.20.030(G) – General Agriculture District (A-2) – Uses Requiring a Use Permit*):

- a. That the property owner owns at least one of the tractor-trailer combinations and lives on-site;
- b. That the parcel on which parking occurs is at least one acre in size;
- c. That the proposed parking facilities be no more than 50% of the parcel size, up to 1.5 acres;
- d. That if an office is proposed it be no larger than 1,200 square feet;
- e. That the parking area be adequately graveled and physically delineated through fencing or landscaping;
- f. That no storage of hazardous materials occur and no loading or unloading occur on-site; and
- g. That any on-site maintenance be limited to windshield wiper replacements and oil changes.

The County's Zoning Ordinance restricts parking facilities to parcels at least one acre in size, not to comprise a footprint larger than 50 percent of the total parcel area, up to a 1.5± acre maximum area that includes any required stormwater drainage facilities. In this case, the parcel is 10.3± acres in size, and the parking area is proposed to be located in the northeast corner of the parcel on a 1.5-acre graveled area, utilizing a 0.5± acre driveway for access. A more in depth discussion on staff's concerns regarding the project potentially exceeding this size limit is included in the *Issues* Section of this report. Stormwater will be handled overland, and the site is proposed to be graveled to maintain groundwater permeability. No exterior lighting or signage is proposed.

Additionally, subsection (i) of 21.20.030(G)(3) requires that the truck parking area be delineated through fencing or vegetative landscaping to distinguish the authorized parking area. A six-foot-tall wooden fence is proposed along the northeastern property line to screen the parking area from public view and prevent trespass. The other boundaries of the parking area are proposed to be enclosed with six-foot-tall chain-link fencing with privacy slats. Based on application information, the project is consistent with the criteria established under 21.20.030(G)(3), with the exception of the parking area potentially being over the 1.5-acre size limit for truck parking facility. As was discussed in the *Issues* section, the definition of a concentration is not defined in the County's Zoning Ordinance and, as such, the Planning Commission has discretion to apply a

standard on a case-by-case basis, including whether a concentration includes only approved facilities or unpermitted ones, as well. In this case, there are 15 truck parking facilities within a 1.5-mile radius of the project site, with only one truck parking facility currently permitted.

Staff believes the establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity. The project site itself is currently used for the production of oats and corn, with a pesticide spray permit for seven acres of the site having most recently been applied for on December 9, 2024 and issued January 1, 2025. The proposed graveled parking area is proposed to displace 1.5 acres of the farmed acreage of the project site. Additionally, the applicant has indicated they no longer intend to farm the parcel.

There is no indication that this project, as proposed and conditioned, will 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 the general welfare of the County.

As discussed in the *Issues* section of this report, staff does not believe that all of the necessary findings can be made to approve the project. It is staff's belief that the project cannot feasibly develop at this location due to the current lack of an approved STAA access route, the existing use of the site being conducted without first obtaining the proper land use entitlements, community opposition to the facility, and the proposed parking facility exceeding the size allowed under Section 21.20.030(G)(3) of the Zoning Ordinance. It is ultimately up to the Planning Commission to determine if the required findings can be made; however, staff is recommending denial of the project as proposed.

## **ENVIRONMENTAL REVIEW**

An environmental assessment for the project has been prepared in accordance with the California Environmental Quality Act (CEQA). The assessment included preparation of an Initial Study (see Exhibit F – *Initial Study, with Attachments*). Pursuant to CEQA, the proposed project was circulated to interested parties and responsible agencies for review and comment, and no significant issues were raised (see Exhibit H – *Environmental Review Referrals*).

Conditions of Approval reflecting referral responses have been placed on the project (see Exhibit C - *Conditions of Approval*). A referral response received from the San Joaquin Valley Air Pollution Control District (SJVAPCD) on December 20, 2023 stated that the project is not expected to exceed SJVAPCD significance thresholds related to NOx emissions. In the same response, the Air District required a Health Risk Assessment (HRA) be completed by the applicant and an Air Impact Assessment (AIA) application be submitted by the applicant to comply with District Rule 9510 - Indirect Source Review (ISR). The Air District deemed the AIA application for the project complete on August 2, 2024.

An Air Quality and Greenhouse Gas Study, SJVAPCD Rule 9510 Indirect Source Review, and Risk Prioritization Scoring was completed for the project by Yorke Engineering, dated July 10, 2024, and was submitted to the Air District on August 23, 2024 for review. The analysis found that the construction and operational phases (which mainly consists of travel and idling emissions) of the proposed project would not exceed any of the Air District's air quality thresholds for criteria pollutant emissions. No construction is proposed as part of the project, and the construction phase will only consist of grading the site. Additionally, the analysis found that the project would

not be a significant source of Toxic Air containments or exceed the thresholds for carcinogenic risk, or acute or chronic hazard indices. Ultimately, the analysis found the project as a whole would not conflict with or obstruct any applicable air quality plans, impact sensitive receptors, or result in cumulatively considerable increases of criteria pollutants. The Air District reviewed the analysis and responded with no comments on October 8, 2024. The project will be subject to all applicable Air District rules and regulations. Additionally, a condition of approval has been added to the project to ensure consultation with the Air District takes place prior to issuance of any grading, encroachment, or building permit

A Negative Declaration has been prepared for approval prior to action on the project itself as the project will not have a significant effect on the environment (see Exhibit G - *Negative Declaration*).

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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 **\$3,025.75** for the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the Clerk-Recorder filing fees. The attached Conditions of Approval ensure that this will occur.

Contact Person: Marcus Ruddicks, Assistant Planner, (209) 525-6330

Attachments:

- Exhibit A - Findings and Actions Required for Project Approval
- Exhibit B - Maps and Site Plan
- Exhibit C - Conditions of Approval
- Exhibit D - Correspondence
- Exhibit E - Tractor-Trailer Parking Excerpt of Zoning Ordinance Section 21.20.030(G) – *General Agriculture District (A-2) – Uses Requiring a Use Permit*
- Exhibit F - Initial Study, with Attachments
- Exhibit G - Negative Declaration
- Exhibit H - Environmental Review Referrals
- Exhibit I - Levine Act Disclosure Statement

## Findings and Actions Required for Project Approval

1. Adopt the 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 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's Office 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 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.
  - b. The establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity.
  - c. The establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity.
  - d. All the criteria listed under Stanislaus County Zoning Ordinance Section 21.20.030(G)(3) in effect at the time of approval are met.
4. Approve Use Permit Application No. PLN2023-0134 – Lucky Star Logistics, Inc., subject to the attached Conditions of Approval.

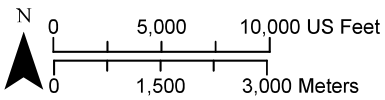
# LUCKY STAR LOGISTICS, INC

## UP PLN2023-0134

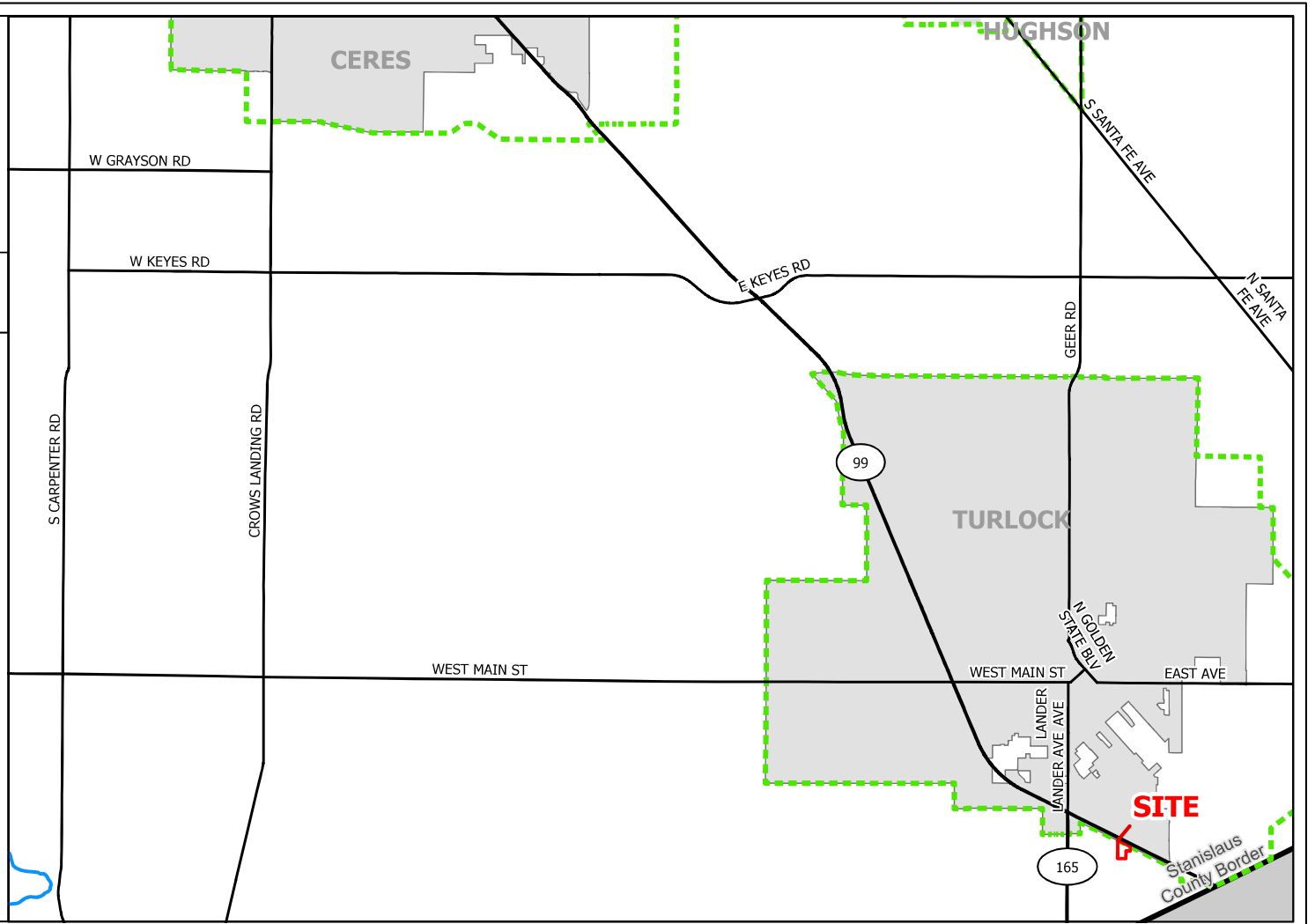
### AREA MAP

#### LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS Date Exported: 1/6/2025



# LUCKY STAR LOGISTICS, INC




## UP PLN2023-0134

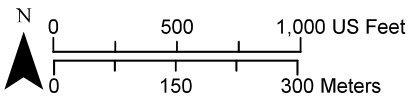
### GENERAL PLAN MAP

#### LEGEND

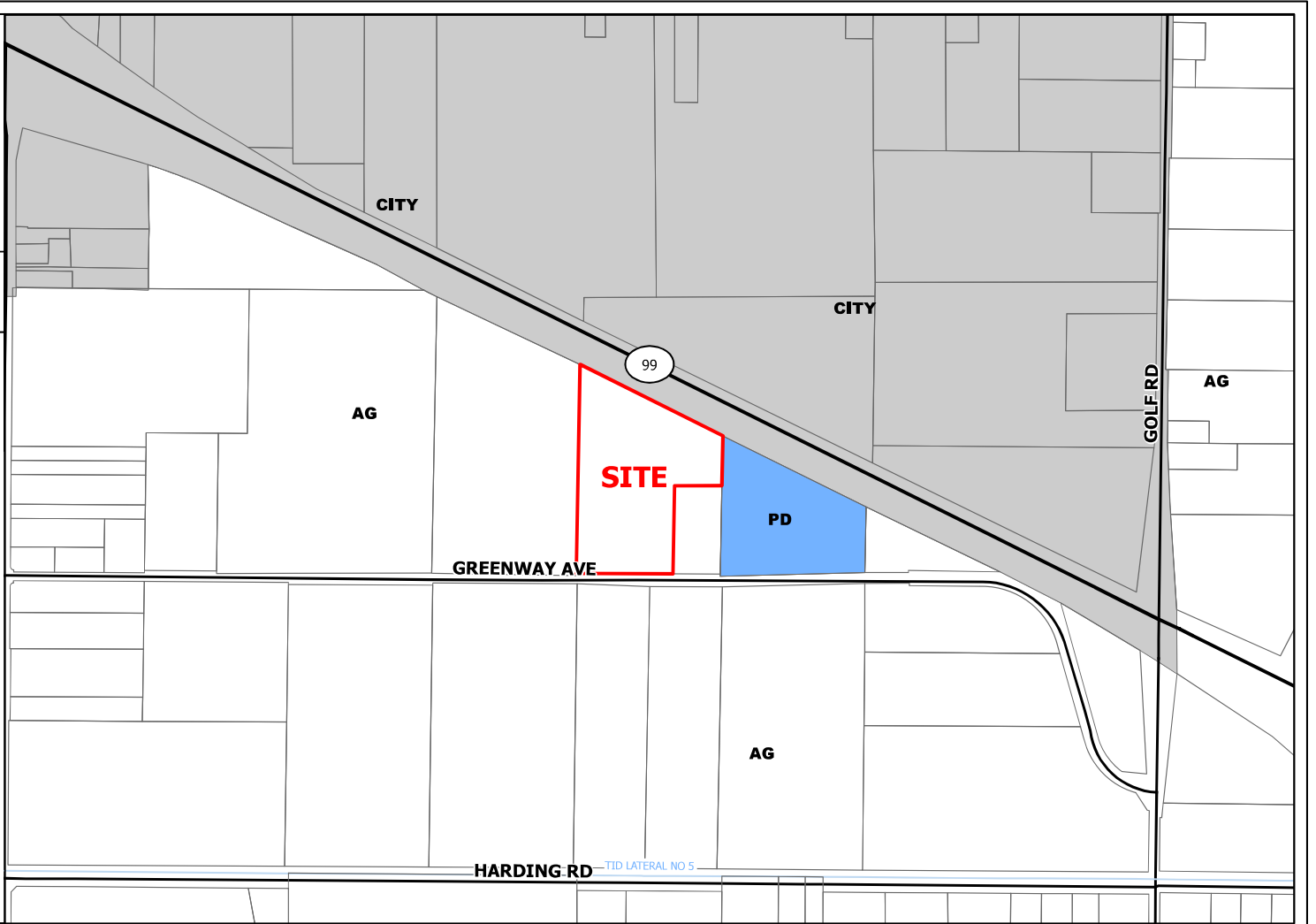
-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal

#### General Plan

-  Agriculture (AG)
-  City
-  Planned Development (PD)



Source: Planning Department GIS Date Exported: 1/6/2025



# LUCKY STAR LOGISTICS, INC




## UP PLN2023-0134

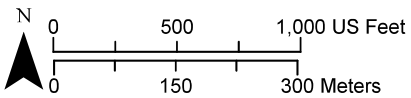
### ZONING MAP

#### LEGEND

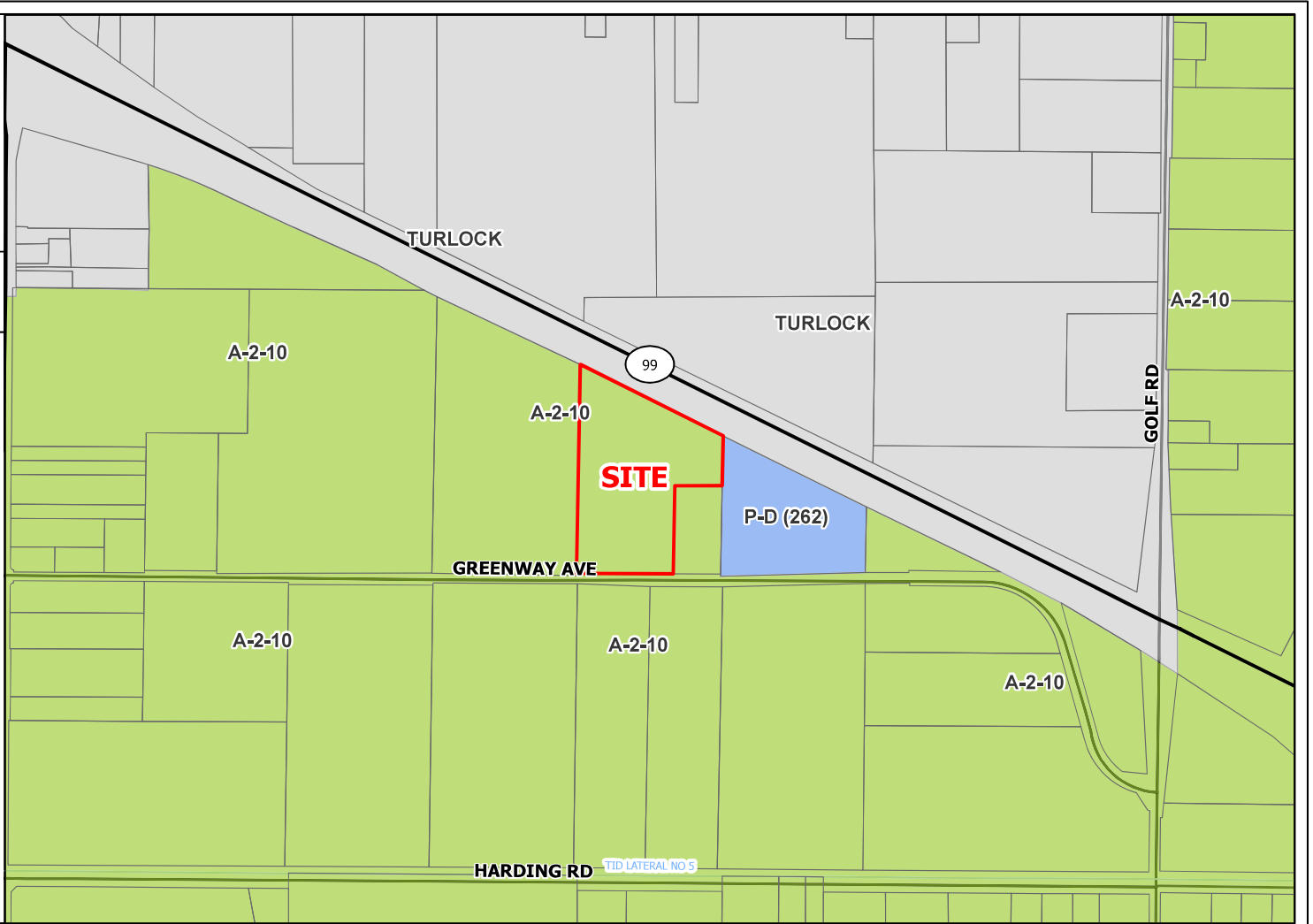
-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal

#### Zoning Designation

-  City of Turlock
-  General AG 10 Acre (A-2-10)
-  Planned Development (P-D)



Source: Planning Department GIS Date Exported: 1/6/2025





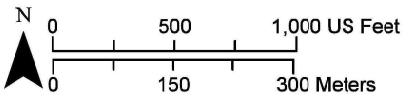
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## UP PLN2023-0134

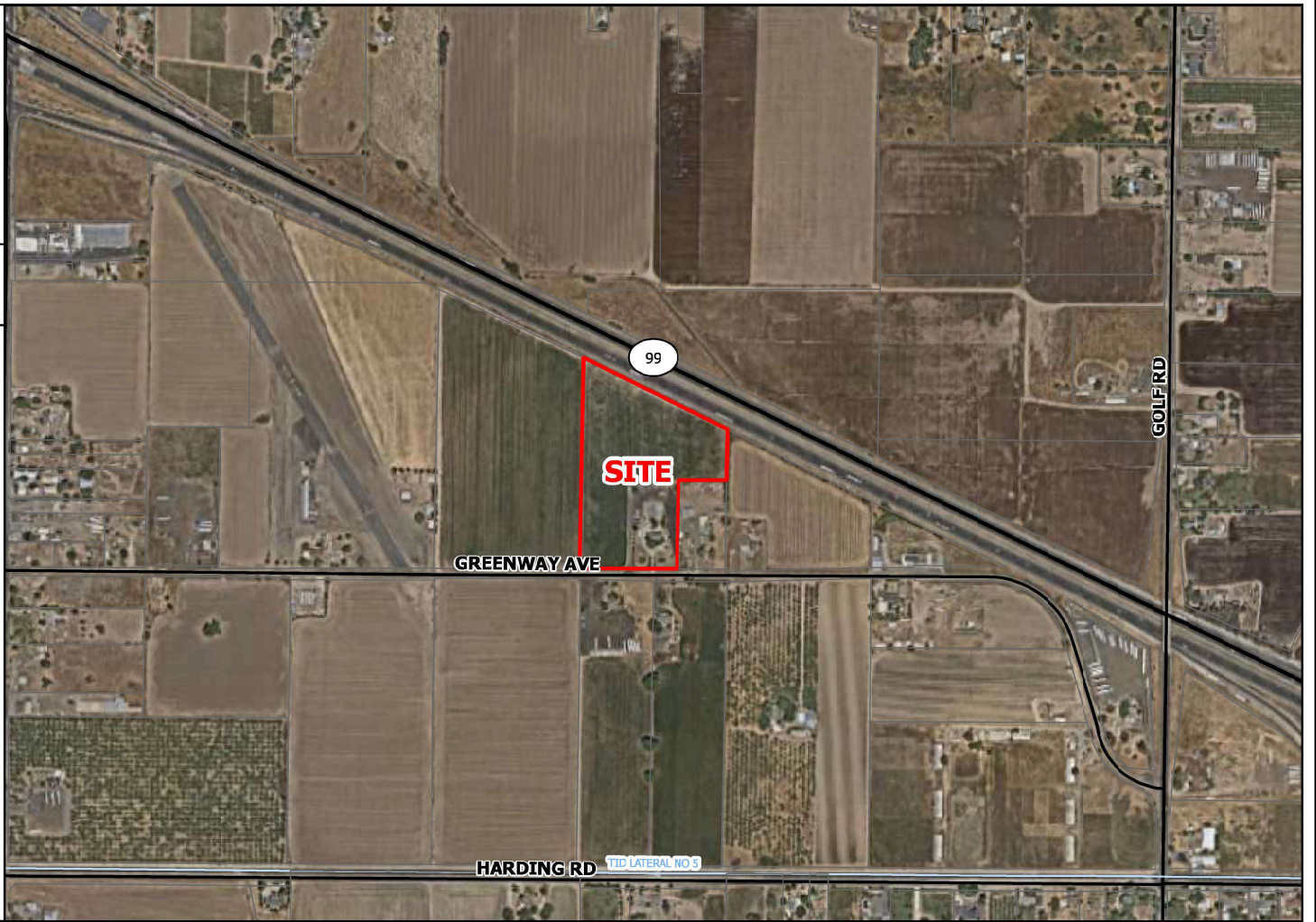
2023 AERIAL AREA MAP

### LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal



Source: Planning Department GIS      Date Exported: 1/5/2025



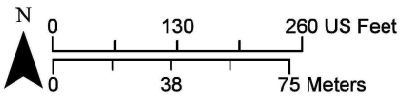
**LUCKY STAR  
LOGISTICS, INC**

**UP  
PLN2023-0134**

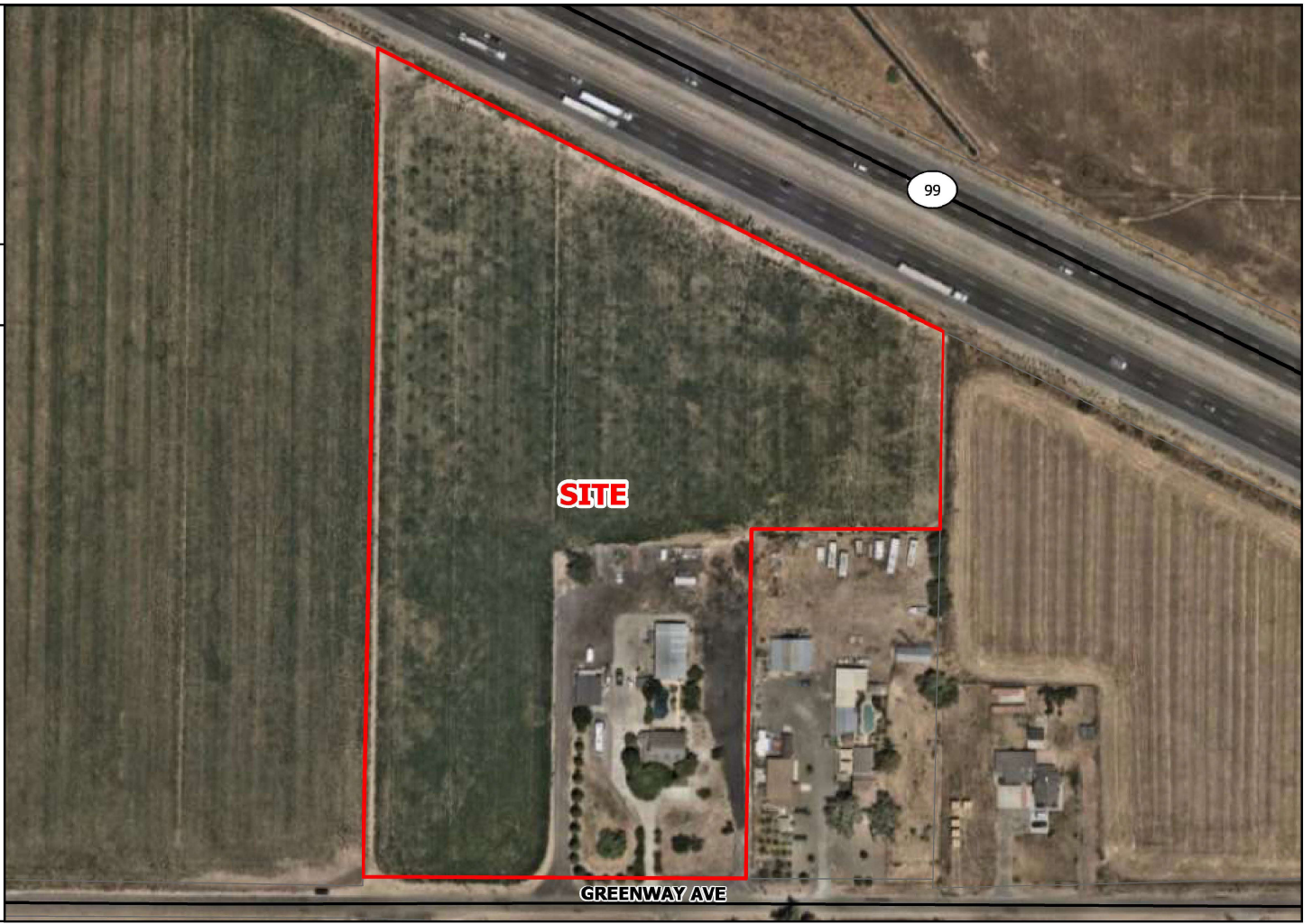
*2023 AERIAL SITE MAP*

**LEGEND**

- Project Site
- Parcel
- Highway
- Street



Source: Planning Department GIS      Date Exported: 1/6/2025



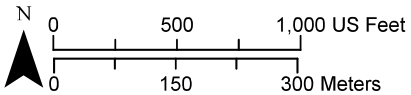
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## UP PLN2023-0134

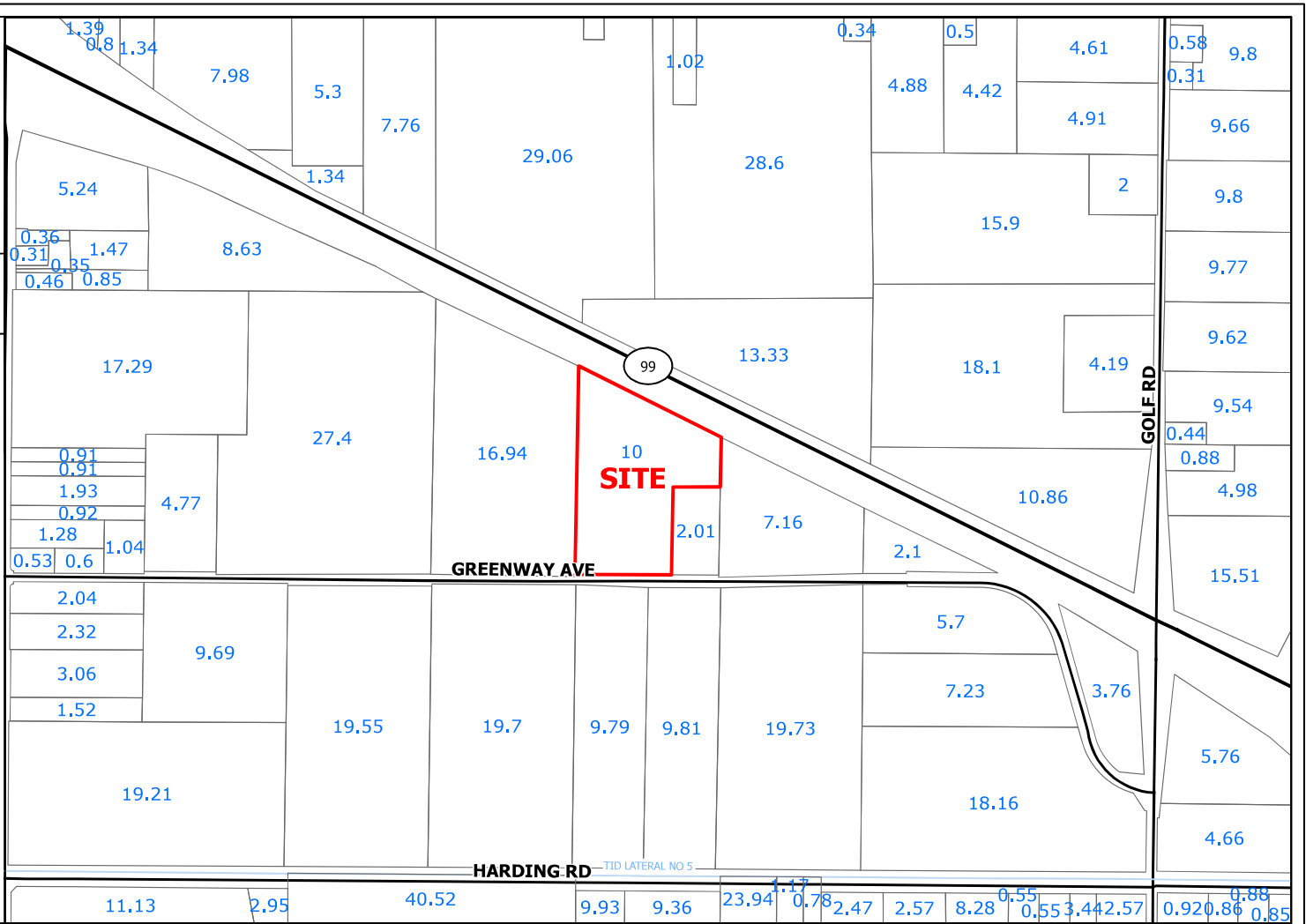
### ACREAGE MAP

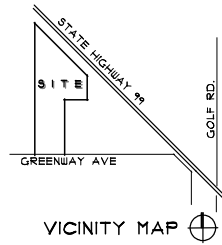
#### LEGEND

-  Project Site
-  Parcel
-  Acres
-  Highway
-  Street
-  Canal



Source: Planning Department GIS Date Exported: 1/6/2025

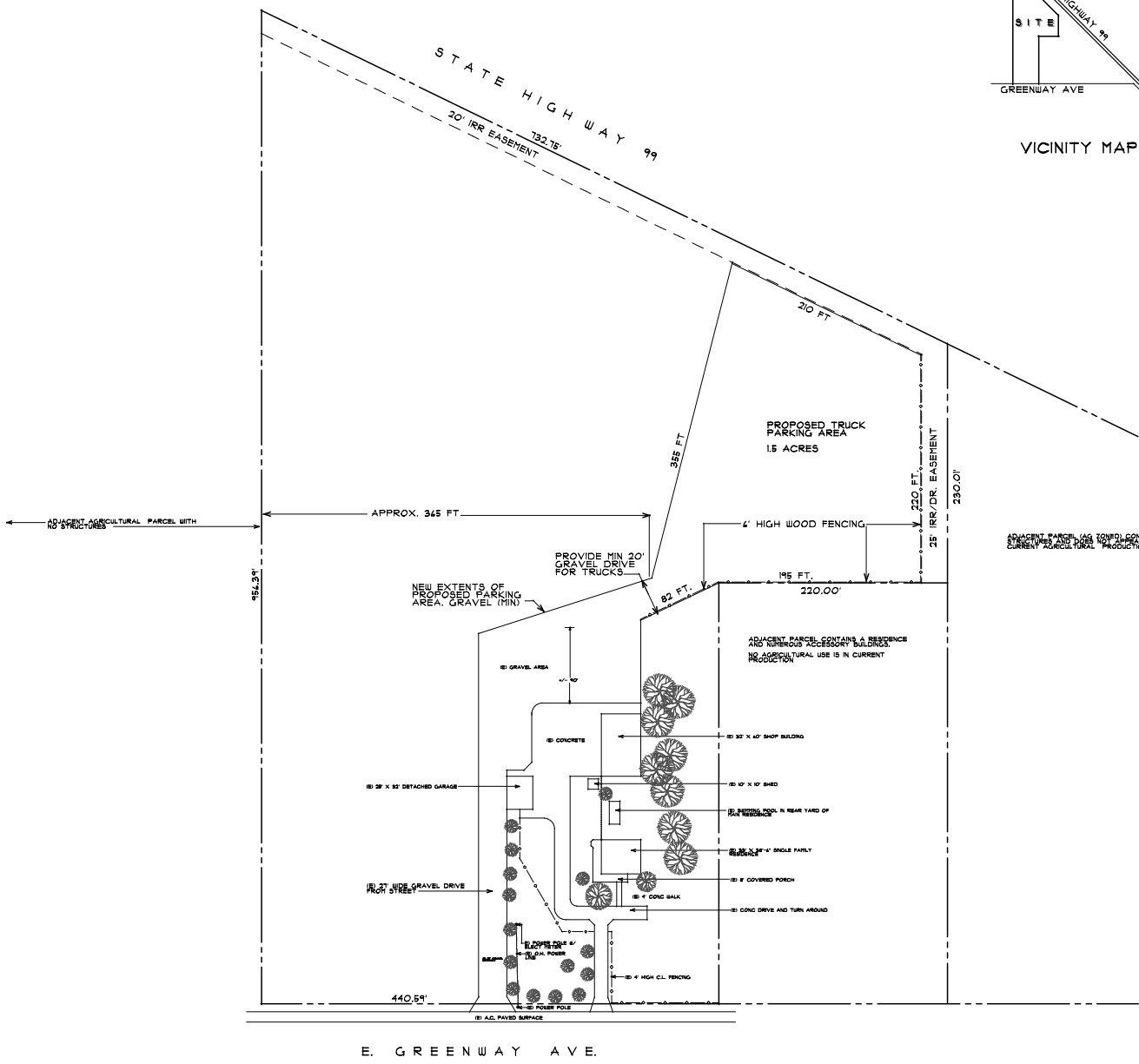




DESIGNER/PLANS: CALIFORNIA AT HOME  
 800 COTT LICKS  
 P.O. BOX 831  
 OAKDALE, CA 95341  
 (209) 848-3121  
 CALIFORNIAATHOME@GMAIL.COM

SCOPE OF WORK: SITE PLAN FOR USE PERMIT FOR TRUCK PARKING

AG BUFFER STATEMENT:  
 PROPOSED TRUCK PARKING IS ADJACENT TO THE STATE HIGHWAY TO THE NORTH. NO AG BUFFER REQUIRED.  
 PROPOSED TRUCK PARKING IS 345 FT. FROM ADJACENT AGRICULTURAL PARCEL TO THE WEST. NO AG BUFFER REQUIRED.  
 PROPOSED TRUCK PARKING IS WITHIN THE 300 FT. AG BUFFER FROM THE PROPERTY TO THE EAST (SOUTH/EAST). PROVIDE 4' WOOD (OR EQ.) FENCING AS NOTED ALONG THOSE SIDES OF THE PARKING AREA.  
 PROPOSED TRUCK PARKING IS MORE THAN 300 FT. FROM THE ROADWAY FRONTING THE PROPERTY AND THEREFORE IS BEYOND THE 300 FT. WHERE AN AG BUFFER IS REQUIRED TO THE SOUTH.



E. GREENWAY AVE.

SITE PLAN

SCALE: 1"=40'-0"

**California at Home**  
 Custom Residential Design & Drafting  
 P.O. BOX 831 OAKDALE CA 95341  
 (209) 848-DRILL (3121) www.californiaat.com  
 email: californiathome@gmail.com

**TRUCK PARKING AREA**

PROPERTY: 1005 E. GREENWAY AVE.  
 ADDRESS: 1005 E. GREENWAY AVE.  
 APN: 004-028-008-001  
 STANISLAUS COUNTY

OWNER: DEEPA BULLAS  
 3425 WILSON DRIVE  
 SACRAMENTO, CA 95801

REVISION

DATE: 8/17/2023  
 SITE PLAN  
 VICINITY

A.I.

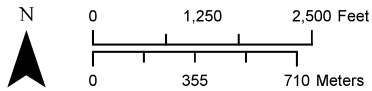
# LUCKY STAR LOGISTICS, INC

UP  
PLN2023-0134

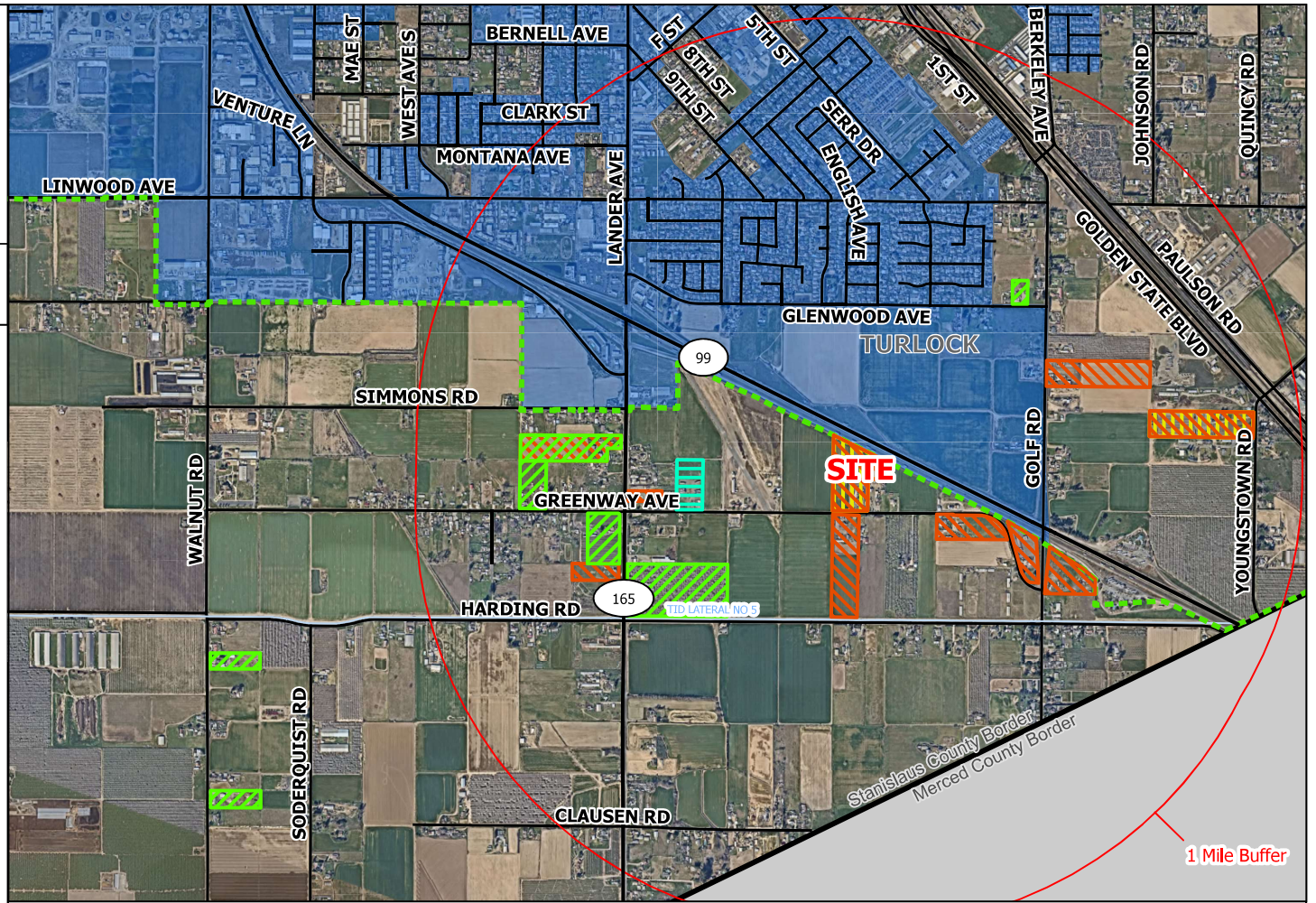
Truck Parking Locations  
1-Mile Radius of Project Site

### LEGEND

-  Project Site
-  1 Mile Buffer
-  Home Occupation Business Licenses
-  Code Enforcement Cases
-  Current Planning Applications
-  Approved Use Permits
-  Sphere of Influence
-  Highway
-  Street
-  Canal



Source: Planning Department GIS Date Exported: 3/4/2025



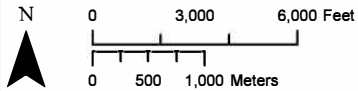
# LUCKY STAR LOGISTICS, INC

## UP PLN2023-0134

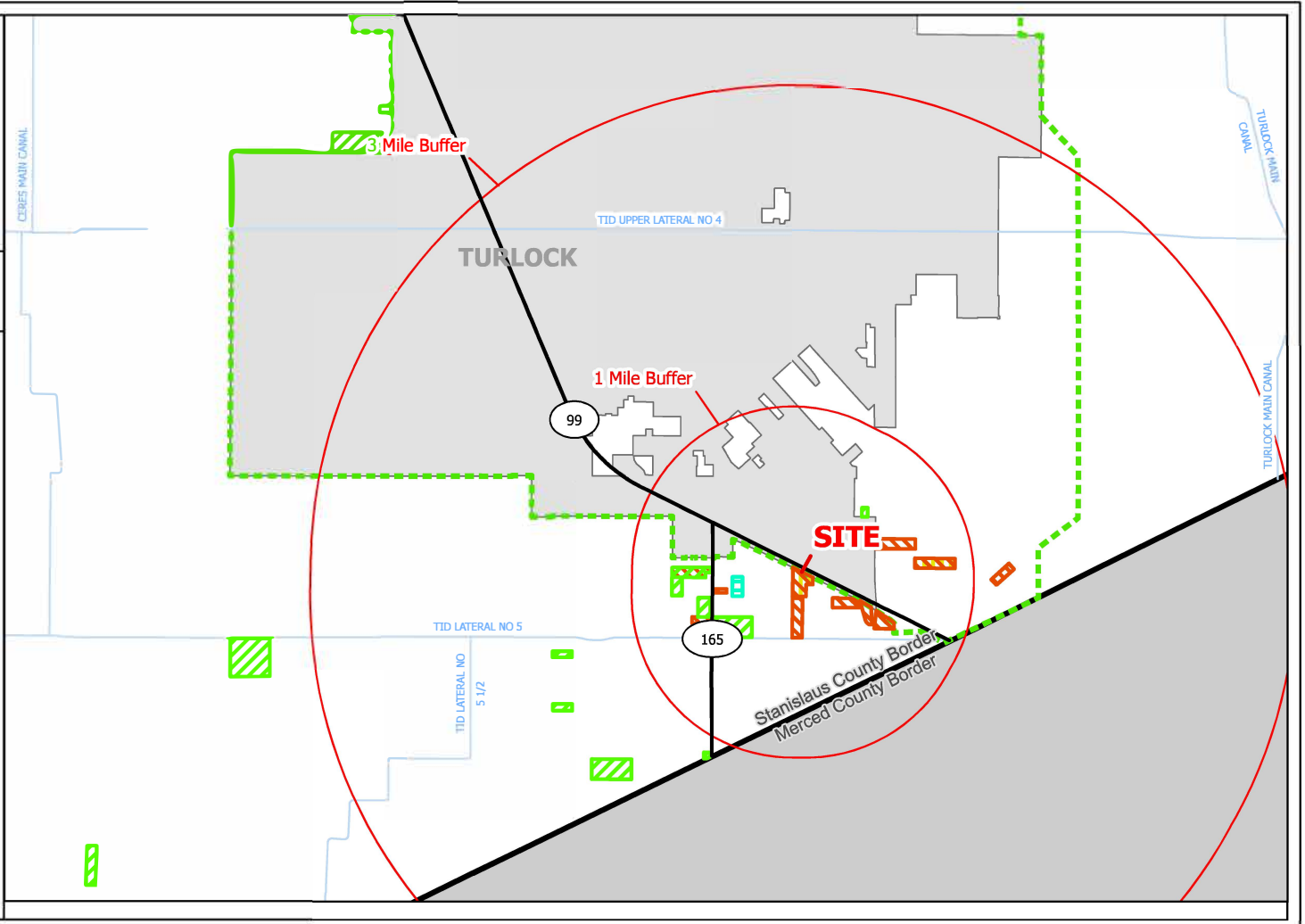
### Truck Parking Locations 3-Mile Radius of Project Site

#### LEGEND

-  Project Site
-  3 Mile Buffer
-  1 Mile Buffer
-  Home Occupation Business Licenses
-  Code Enforcement Cases
-  Current Planning Applications
-  Approved Use Permits
-  Sphere of Influence
-  Highway
-  Canal



Source: Planning Department GIS Date Exported: 3/4/2025



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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. PLN2023-0134**  
**LUCKY STAR LOGISTICS, INC**

### Department of Planning and Community Development

1. Use(s) shall be conducted as described in the application and supporting information (including the plot plan) as approved by the Planning Commission and/or Board of Supervisors and in accordance with other laws and ordinances.
2. The use shall cease at such a time that any of the criteria listed under Stanislaus County Zoning Ordinance Section 21.20.030(G)(3) in effect at the time of use permit approval is no longer met.
3. Pursuant to Section 711.4 of the California Fish and Game Code, the applicant is required to pay a California Department of Fish and Wildlife 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 **\$3,025.75**, made payable to **Stanislaus County**, for the payment of California Department of Fish and Wildlife and Clerk-Recorder filing fees.  
  
Pursuant to Section 711.4 (e) (3) of the California Fish and Game Code, no project shall be operative, vested, or final, nor shall local government permits for the project be valid, until the filing fees required pursuant to this section are paid.
4. Developer shall pay all Public Facilities Impact Fees and Fire Facilities Fees as adopted by Resolution of the Board of Supervisors. The fees shall be payable at the time of issuance of a building permit for any construction in the development project and shall be based on the rates in effect at the time of building permit issuance.
5. The applicant/owner is required to defend, indemnify, or hold harmless the County, its officers, and employees from any claim, action, or proceedings against the County to set aside the approval of the project which is brought within the applicable statute of limitations. The County shall promptly notify the applicant of any claim, action, or proceeding to set aside the approval and shall cooperate fully in the defense.
6. 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.

7. 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.
8. Pursuant to the federal and state Endangered Species Acts, prior to construction, the developer shall be responsible for contacting the US Fish and Wildlife Service and California Department of Fish and Game to determine if any special status plant or animal species are present on the project site and shall be responsible for obtaining all appropriate permits or authorizations from these agencies, if necessary.
9. No operations shall be conducted on any premises in such a manner as to cause an unreasonable amount of noise, odor, dust, smoke, vibration, or electrical interference detectable off the site.
10. Within three months of project approval, minimum six-foot-tall, uniform wood or chain link fencing shall be installed around the parking area, and landscaping a minimum of 10 feet tall at maturity shall be installed on the exterior of the parking area along the State Route 99 frontage. Any further changes to the material or height shall be subject to review and approval by the Planning Director or appointed designee. Fencing shall be maintained in good condition and free of debris.
11. Within three months of project approval, a valid Business License shall be obtained and maintained by the site operator for a home office for the mobile truck repair business. The business shall be operated in accordance with all criteria of Chapter 21.94 - *Home Occupations* of the Stanislaus County Zoning Ordinance. Within three months of project approval, all advertising or display of the project site's address or location in print and online sources shall be removed.

**Department of Public Works**

12. No parking, loading, or unloading of vehicles shall be permitted within the County road right-of-way.
13. The developer will be required to install or pay for the installation of any street signs and/or markings, if warranted.
14. An encroachment permit shall be obtained within six months of project approval and finalized within three months of project approval for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right-of-way. An extension may be granted at the discretion of the Director of Public Works or appointed designee provided sufficient justification is submitted illustrating the need for additional time.



- a. Driveway location and design shall be reviewed and approved by Stanislaus County Public Works prior to encroachment permit issuance.
  - b. The commercial driveway and approach for truck access shall meet Stanislaus County Standards Plate 3-G35.
  - c. The northern driveway approach for residential access shall meet Stanislaus County Standards Plate 3-F5.
15. The storage depth outside of any gate shall be adequate for trucks coming off the road. The entry vehicles shall not block any travel lane or shoulder. If the storage depth is inadequate, it may require that the fence be moved further into the property.
16. A grading permit shall be obtained within three months of project approval and finalized within 12 months of project approval. A grading, drainage and erosion/sediment control plan for the project site shall be submitted. The grading and drainage plan shall include the following information:
- a. The plan shall contain drainage calculations and enough information to verify that runoff from the project will not flow onto adjacent properties and Stanislaus County road right-of-way. Public Works will review and approve the drainage calculations.
  - b. For projects greater than one acre in size, the grading drainage and erosion/sediment control plan shall comply with the current State of California National Pollutant Discharge Elimination System (NPDES) General Construction Permit. A Waste Discharge Identification Number (WDID) and a copy of the Notice of Intent (NOI) and the project's Storm Water Pollution Prevention Plan (SWPPP) shall be provided prior to the approval of any grading, if applicable.
  - c. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for review of the grading plan.
  - d. The applicant of the grading permit shall pay the current Stanislaus County Public Works weighted labor rate for all on-site inspections. The Public Works inspector shall be contacted 48 hours prior to the commencement of any grading or drainage work on-site.
  - e. A calculation of the total acreage of the parking area to be graveled, which shall be limited to 1.5 acres maximum in size.
17. No vehicles exceeding the legal limits in, but not limited to, length, weight, width, or height of the California Vehicle Code (pursuant to California Vehicle Code Division 15 Sections 35000-35796) or Stanislaus County Code shall be permitted to travel to and from the project site without the required approvals from all affected agencies.
18. All existing parking of STAA rated vehicles shall cease within 30 days of project approval. The following shall be met prior to the future parking of STAA rated vehicles onsite:

- a. A Staff Approval Permit (with referral to Stanislaus County Public Works and Caltrans) shall be obtained from the Stanislaus County Department of Planning and Community Development;
- b. A STAA access route application shall be obtained from the Stanislaus County Department of Public Works for route approval along East Greenway Avenue from the project site to Lander Avenue (State Route 165); and
- c. STAA route approval shall be obtained from the State Department of Transportation (Caltrans).

**Department of Environmental Resources (DER) - Environmental Health Division**

19. Prior to issuance of any future grading or building permit, the applicant shall submit a site plan that includes the location, layout and design of all-existing and proposed on-site wastewater treatment systems (OWTS), the Future 100% Expansion (Replacement) Areas, and water wells. Any new building requiring an on-site wastewater treatment system OWTS, shall be designed according to type and/or maximum occupancy of the proposed structure to the estimated waste/sewage design flow rate.
20. Prior to the issuance of any building permit, the applicant(s) shall submit to the Department of Environmental Resources (DER) evidence that the existing and/or proposed on-site wastewater treatment system (OWTS) serving the existing 1,920± square-foot detached shop (employee restroom) meets conditions and guidelines, as established by Measure X, regarding Primary and Secondary wastewater treatment systems.
21. Prior to issuance of a grading, encroachment, or building permit or licenses to conduct business identified in this application, the property owner shall certify to the DER that the property use does not or will not constitute a public water system or submit an application for water supply permit and associated technical report to the State Water Boards.
22. All applicable County Local Agency Management (LAMP) standards and required setbacks are to be met.

**Department of Environmental Resources (DER) – Hazardous Materials Division**

23. No oil changes or truck maintenance shall occur on-site until the applicant has contacted DER to secure the proper permits and approvals to conduct this use and a Staff Approval Permit from the Department of Planning and Community Development is obtained.

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

24. The proposed project may be subject to SJVAPCD Rules and Regulations in place at the time of operation. Prior to issuance of a grading, encroachment, or building permit, the applicant shall contact the SJVAPCD's Small Business Assistance Office to determine if any SJVAPCD permits or if any other SJVAPCD rules or permits are required, including but not limited to an Authority to Construct (ATC).

25. There shall be no idling of the primary diesel engine of truck-tractors parked on-site longer than five minutes at any time.

\*\*\*\*\*

*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 will be in bold font and deleted wording will be in strikethrough.*

Date: January 23, 2025

To: Project Planner, Marcus Ruddicks  
Stanislaus County

From: Randy & Edythe Watts  
3512 Golf Road  
Turlock Ca 95380

Dear Mr. Ruddicks,

I am writing in regard to the request to allow a trucking business to conduct their business on land zoned for agriculture. This business is as follows:

Lucky Star Logistics, Inc.  
1005 E. Greenway Ave  
Turlock CA 95380  
APN: 044-028-011  
General Plan: Agriculture  
Current Zoning: General Agriculture

I strongly urge you to deny this request. We on Golf Road have had these trucking lots on our road for over 15 years and we have strongly contested them. The county has fined them, cited them, put liens against their property, and brought them to the Nuisance Abatement Board where they were told to cease and desist. They continued to grow and expand and destroy our farm land. They also cause major traffic problems and they have destroyed our road, which is to be residential and ag traffic only, not big rig traffic. They have polluted the ground with their road base and chemicals related to the trucks. They have shown absolutely no regard for our laws.

Our valley used to be the richest in the world. Now it is being paved over acre by acre. The trucks can park on industrial land that is zoned for them. We can not farm on industrial land. On industrial land, they will pay the commercial and industrial rates that, at least to some degree, cover the cost of the damage they do.

Please protect our dwindling farm land and vote to protect the land use of agriculturally zoned land.

Thank you for your attention to our serious concerns.

Sincerely,

Randy & Edythe Watts

## Marcus Ruddicks

---

**From:** Sedonia Estacio [REDACTED]  
**Sent:** Wednesday, February 26, 2025 11:42 PM  
**To:** Planning  
**Subject:** Re: Stanislaus County - CEQA Referral Initial Study & NOI - PLN2023-0134 – Lucky Star Logistics, Inc. - Please Respond by February 26, 2025

**\*\*\* WARNING:** This message originated from outside of **Stanislaus County**. **DO NOT** click links or open attachments unless you recognize the sender and know the content is safe **\*\*\***

### Concerns Regarding Proposed Application and Local Infrastructure

Dear Planning Commission,

I am writing to share my concerns regarding the proposed application. After visiting the area near Golf Road, I feel compelled to express my observations. I was disheartened to see the prevalence of unpermitted truck establishments that have severely impacted the area. The state of these businesses and their surroundings is both unsightly and troubling. The lack of basic environmental upkeep is alarming, especially when compared to the standards upheld by their neighboring counterparts.

The condition of the infrastructure around Golf Road and Greenway Road is equally concerning, with both roads severely deteriorated. While I previously thought the area around Faith Home Road near the Keyes Road exit was in poor condition, the situation for the farmers in this region seems even more dire. Faith Home Road itself is not far behind in terms of agriculture degradation.

Given the circumstances, I urge you to reconsider this proposal. The addition of more truck establishments will only exacerbate the challenges faced by local residents and farmers. Please consider the long-term impact on the community and the preservation of agricultural land. We must avoid transforming Turlock into a sprawling truck stop at the expense of the very environment and community that make it unique. I strongly encourage you to personally visit the area around Golf Road and Greenway Road to witness firsthand the extent of the issues accumulating in this location. I can assure you, it is far from appealing and is certainly not the image we want Turlock to be associated with.

Thank you for your time and attention to this matter. I appreciate your consideration.

Sincerely,  
S. Estacio

On Jan 22, 2025, at 3:10 PM, Planning <planning@stancounty.com> wrote:

Good afternoon,

The CEQA 30-Day Referral Initial Study and Notice of Intent to Adopt a Negative Declaration for **Use Permit Application No. PLN2023-0134 – Lucky Star Logistics, Inc.** can now be viewed online at the following link:

To view the item, please visit the Stanislaus County Planning and Community Development Department Active Projects web page (<https://www.stancounty.com/planning/pl/act-projects.shtm>).

Please note that responses are due by **February 26, 2025**.

Thank you,

**Patricia Sanchez**

Administrative Clerk III

Stanislaus County Planning and Community Development Department

*“Due to high volume, appointments are strongly recommended and will be given priority over walk-ins. For information on how to schedule an appointment please go to <http://www.stancounty.com/planning/contacts.shtm>”*

**21.20.030** Uses requiring use permit

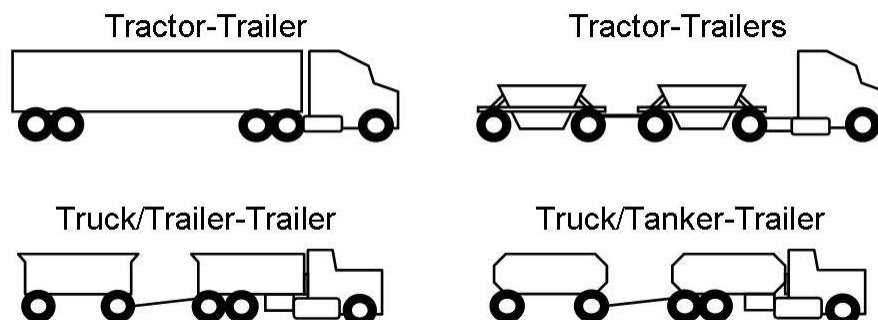
6. Such other limitations or conditions as may be imposed by the planning commission or board of supervisors. (Ord. CS 501 Section 1, 1992; Ord. CS 424 Section 1, 1991; Ord. CS 305 Section 1, 1988; Ord CS 294 Section 1, 1988; Ord. CS 260 Section 1, 1987; Ord. CS 141 Section 3 (part), 1985; Ord. CS 106 Section 2 (part), 1984).

E. Repealed December 18, 2007 (Ord. CS 1020 Sec. 6, 2007).

F. New confined animal facility and expansions of existing confined animal facility requiring a new or modified permit, waiver, order, or waste discharge requirements from the Regional Water Quality Control Board, where the issuance of such permit, waiver, order or waste discharge requirements requires compliance with the California Environmental Quality Act. Lagoons or ponds for the storage of animal wastes shall be located a minimum of fifty feet from any property line and three hundred feet from any dwelling on an adjacent property. (CS Ord. 861, Sec. 3, effective December 25, 2003)

G. Parking of tractor-trailer combinations may be allowed when the Planning Commission finds that, in addition to the findings required under Section 21.96.050:

1. The establishment as proposed will not be substantially detrimental to or in conflict with agricultural use of other property in the vicinity;
2. The establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity; and
3. All the following criteria are met:
  - a) For the purpose of this ordinance, a tractor-trailer combination shall include a tractor-trailer, truck/trailer-trailer, or truck/tanker-trailer combination with a minimum of five (5) axles and capable of hauling a combined gross vehicle weight (GVW) of 80,000 pounds. The following illustrates the type of permitted combinations:



- b) At least one of the combinations shall be registered to the property owner and the property owner shall live on the parcel.

**21.20.030** Uses requiring use permit

- c) The total number of tractors, truck/trailers and truck/tankers shall not exceed twelve (12) and the total number of trailers shall not exceed two (2) per tractor, truck/trailer, or truck/tanker. For the purpose of this ordinance, a set of double trailers shall be equivalent to one trailer.
- d) The parcel on which parking will occur is one acre or more in size, the total area of the parcel used for the parking operation does not exceed 1.5 acres in size, and the area used for parking, including employee parking, shall not exceed fifty percent of the entire parcel.
- e) No off-loading of trailers shall occur on-site.
- f) All tractors, truck/trailers, truck/tankers and trailers parking on-site shall be in full operable condition for at least six consecutive months of every year.
- g) One on-site office, accessory to the parking operation, not to exceed 1,200 square feet in size, may be maintained within an on-site dwelling or within an accessory structure provided all applicable building permits are obtained and public facility fees paid, if applicable.
- h) Access to the site shall be available without violation of any state, county, or city roadway weight restrictions, and a driveway approach acceptable to the Department of Public Works is provided.
- i) Parking areas, including employee parking, and driveways shall be adequately graveled to reduce dust emissions and all parking areas shall be located outside any required front yard or corner lot side yard and delineated through fencing or vegetative landscaping to distinguish the authorized parking area.
- j) On-site maintenance shall be limited to oil and tire changes, light and windshield wiper replacements, and checking fluids.
- k) No signs advertising parking shall be placed on the property.
- l) On-site storage and use of related equipment may be considered by the Planning Commission as part of the application consideration.

This subsection is intended to allow for the parking of tractor-trailer, truck/trailer-trailer, and truck/tanker-trailer combinations used to transport goods and materials and requiring a California commercial A license for operation on a public roadway. This subsection is not intended to allow the parking of commercial vehicles used for the transportation of people or pick-up trucks, tow trucks, delivery trucks, box trucks, fleet vehicles or other similar vehicles. Trucks used solely for permitted agricultural operations on site are exempt from this provision. (Ord. CS 1117 Section 1, 2012)

- H. Commercial cannabis cultivation or nursery activities and distribution activities (limited to permitted commercial cannabis product grown on-site) subject to Section 21.08.020(D) of this Title, may be allowed when conducted within a greenhouse or accessory agricultural storage building as permitted by Title 6 of the County Code. (Ord. CS 1205, Sec. 3, 2018).





## CEQA INITIAL STUDY

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

1. **Project title:** Use Permit Application No. PLN2023-0134  
Lucky Star Logistics, Inc.
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:** Teresa McDonald, Associate Planner  
(209) 525-6330
4. **Project location:** 1005 East Greenway Avenue, between Lander Avenue and Golf Road, in the Turlock area.  
(APN 044-028-011)
5. **Project sponsor's name and address:** Rajinder Bhullar, Lucky Star Logistics, Inc.  
3914 River Springs Way  
Ceres, CA 95307
6. **General Plan designation:** Agriculture
7. **Zoning:** General Agriculture (A-2-10)
8. **Description of project:**

Request to permit an existing truck parking facility for up to 12 tractor-trailer combinations, on a 1.5-acre portion of a 10.3± acre parcel, in the General Agriculture (A-2-10) zoning district. The project site is currently developed with a 1,937± square-foot single-family dwelling, a 1,920± square-foot detached shop, and an 800± square-foot detached garage. The truck parking facility will include up to 12 truck-tractors and up to 24 trailers, all owned by the applicant. Approximately 350± square feet of the existing dwelling on-site will be utilized as a home office for the truck parking facility, and the existing 1,920± square-foot detached shop will provide restroom facilities for the employees. The project requests to develop a 1.5± acre graveled parking with 12 parking stalls for 12 tractor-trailer combinations owned by the applicant and four passenger vehicle parking stalls. The site has two existing driveways: one paved driveway lined with four-foot-tall chain link fencing and shrubs, which provides access to the single-family dwelling; and a graveled driveway lined with redwood trees, which provides access for the trucks and is gated. The site is served by a private well and a private septic system. No new construction is proposed as part of this project.

Lucky Star Logistics has ten total employees that report to the site between trips; however, a maximum of four employees access the site daily for the pick up and drop off of personal passenger vehicles and tractor-trailers. Proposed hours of operation for the on-site office are 8:00 a.m. to 5:00 p.m., seven days a week. Drivers will be able to access the site twenty-four hours a day, seven days a week. The trucks will transport general dry freight, such as seeds, sweet potatoes, and hay. Up to ten one-way truck trips and eight one-way passenger vehicle trips per-day are expected. No supply deliveries, loading, or unloading will occur as part of the project. No hauled materials will be brought back to the site. The trucks will be left empty when parked on-site between trips. No fueling or major tractor-trailer maintenance, nor repairs, fluid changes, or washing will occur on-site. Minor maintenance limited to tire changes, light and windshield wiper replacements, and checking fluids will be conducted on-site. Storm drainage will be maintained via overland runoff. The remainder of the parcel will be left fallow and undeveloped. This use permit application was submitted in response to an active Code Enforcement case for unpermitted truck parking (No. CE 23-0452).

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9. **Surrounding land uses and setting:** Scattered rural ranchettes and irrigated cropland in all directions; State Route 165 and Turlock Airpark to the west; State Route 99 and City of Turlock to the north ; a group home to the east; and County of Merced to the south.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):** Caltrans  
Stanislaus County Department of Public Works  
Stanislaus Department of Environmental Resources  
San Joaquin Valley Air Pollution Control District
11. **Attachments:**
- I. Air Quality Impact Analysis, Health Risk Analysis, and Greenhouse Gas Impact Analysis by Yorke Engineering, dated July 10, 2024

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

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

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

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

On the basis of this initial evaluation:

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

Signature on File  
 Prepared by Teresa McDonald, Associate Planner

January 22, 2025  
 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, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

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

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

**ISSUES**

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

**Discussion:** The site is currently improved with 1,937± square-foot single-family dwelling, a 1,920± square-foot detached shop, and an 800± square-foot detached garage. The proposed gravel parking area will encompass approximately 1.5± acres of a 10.3± acre parcel and will be enclosed with a six-foot-tall wooden fence proposed along the northeastern property line to screen the parking area from public view and prevent trespass. The other boundaries of the parking area are proposed to be enclosed with six-foot-tall metal fencing. No exterior lighting or signage is proposed. The remainder of the parcel will be left fallow.

The only scenic designation in the County is along Interstate 5, which is not near the project site. The site itself is not considered to be a scenic resource or unique scenic vista. Scattered rural ranchettes and irrigated agriculture are located in all directions surrounding the project site. State Route 165 and Turlock Airpark are located to the west, State Route 99 and City of Turlock is located to the north, and the County of Merced is located to the south. Structures within the surrounding area consist primarily of metal agricultural buildings, and residential and accessory structures with stucco, metal, and wood facades. No adverse impacts to the existing visual character of the site or its surroundings are anticipated.

**Mitigation:** None.

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

<b>II. AGRICULTURE AND FOREST RESOURCES:</b> 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:** Approximately 1.5± acres at the southeastern portion of the project site, that has already been developed with a single-family dwelling and agricultural storage building, is classified as “Rural Residential Land” by the California Department of Conservation’s Farmland Mapping and Monitoring Program. 8.2± acres of the site is classified as “Farmland of Statewide Importance,” with the remaining 0.6± acre portion in the southwest corner of the property classified as “Prime Farmland.” The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that approximately 93.7 percent of the project site is comprised of Dinuba sandy loam, 0 to 1 percent slopes (DrA), which has a California Revised Storie Index Rating of 86. The California Revised Storie Index is a rating system based on soil properties that dictate the potential for soils to be used for irrigated agricultural production in California. The 86 Index rating equates to Grade 1 soils which are considered to be excellent soil to be used for irrigated agriculture. The remaining 6.3 percent of the project site is comprised of Hilmar loamy sand, 0 to 1 percent slopes (HfA), which has a California Revised Storie Index Rating of 68. The 68 Index rating equates to Grade 2 soils which are considered to be good soil to be used for irrigated agriculture. Stanislaus County considers land that meets at least one of the following requirements to be prime farmland under the Uniform Rules: parcels comprised of Class 1 or Class 2 soils; parcels comprised of Grade 1 or Grade 2 soils; irrigated pastureland which supports livestock used for the production of food and fiber; and land used for unprocessed agricultural plant production with an annual gross value of not less than eight hundred dollars per-acre. Although the project site does meet the definition of prime farmland under the County’s Uniform Rules, the site presently comprises 8± acres of land, notwithstanding the proposed parking area, that is undeveloped with structures (the existing permitted dwelling and garage). These 8± acres are not currently improved with production agriculture and have not been farmed for several years. Pursuant to the County’s Uniform Rules, 10-acres is presumed to

be the minimum available acreage necessary to be economically viable to independently farm. Additionally, the 1.5± acre parking area is proposed to have a graveled parking surface, which would not preclude the site from future agricultural production. The proposed project will not permanently convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

The surrounding area is comprised of scattered single-family dwellings and irrigated cropland in all directions, State Route 165 and Turlock Airpark to the west, State Route 99 and the City of Turlock to the north, a group home to the east, and the County of Merced to the south.

The project site itself is not enrolled in a Williamson Act Contract; however, the nearest parcels enrolled in a Williamson Act Contract is a 9.7± acre farmed parcel located approximately 1,300± feet to the southwest of the project site across East Greenway Avenue. Non-contracted production agriculture exists to the west and south of the project site.

Buffer and Setback Guidelines are applicable to new or expanding uses approved in or adjacent to the General Agriculture (A-2-40) zoning district and are required to be designed to physically avoid conflicts between agricultural and nonagricultural uses. General Plan Amendment No. 2011-01 – Revised Agricultural Buffers was approved by the Board of Supervisors on December 20, 2011, to modify County requirements for buffers on agricultural projects. Facilities that may be located within a required agricultural buffer include parking lots. Based on the requested use consisting of a tractor-trailer parking facility, the project is not subject to agricultural buffers. A maximum of four of the facility’s ten employees will access the site per-day, and the facility will have no customer visits per-day. Up to ten truck trips (inbound and outbound trips for five trucks) and eight passenger vehicle trips (inbound and outbound trips for four employees accessing the site) per-day are expected. Proposed hours of operation are Monday through Sunday from 8:00 a.m. to 5:00 p.m. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. The request is not expected to result in any significant or permanent conversion of farmland to non-agriculture use. No impacts to agriculture are anticipated to occur as a result of this project as the project site is currently developed with residential and accessory structures and considered topographically flat.

The project site is currently served by the Turlock Irrigation District (TID) for irrigation water. The project was referred to TID, who responded with no comments.

Based on this information, staff believes that the proposed project will not conflict with any agriculturally zoned land or Williamson Act Contracted land, nor will the project result in the conversion of unique farmland, farmland of statewide importance.

No forest lands or timberland exist in Stanislaus County. Therefore, this project will have no impact to forest land or timberland.

**Mitigation:** None.

**References:** Natural Resources Conservation Service Soil Survey; application information; Stanislaus Soil Survey (1957); California State Department of Conservation Farmland Mapping and Monitoring Program - Stanislaus County Farmland 2018; Referral response from the Turlock Irrigation District, dated January 31, 2024; 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 district or air pollution control district may be relied upon to make the following determinations. -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	

<p><b>d) Result in other emissions (such as those odors adversely affecting a substantial number of people?)</b></p>			<p><b>X</b></p>	
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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. The proposed hours of operation for the truck parking facility are twenty-four hours a day, seven days a week, and the facility will have four employees accessing the site per-day. Up to ten truck trips and eight vehicle trips are expected per-day. No construction is proposed.

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 long-term operational emissions, as discussed below. Because no construction is proposed and operation of the project would not exceed the SJVAPCD significance thresholds, the proposed project would not increase the frequency or severity of existing air quality standards or the interim emission reductions specified in the air plans.

The Air District provided a project referral response on December 20, 2023 indicating that the proposed project is below the District’s thresholds of significance for emissions from construction and operation. In the same response, the Air District required a Health Risk Assessment (HRA) be completed by the applicant and an Air Impact Assessment (AIA) application be submitted by the applicant to comply with District Rule 9510 - Indirect Source Review (ISR). The District deemed the AIA application for the project complete on August 2, 2024.

An Air Quality Impact Analysis, Health Risk Analysis, and Greenhouse Gas Impact Analysis by Yorke Engineering, dated July 10, 2024, was completed for the project and submitted to the Air District on August 23, 2024. The analysis found that the construction and operational phases of the proposed project would not exceed any of the District’s air quality thresholds for criteria pollutant emissions. No construction is proposed as part of the project, and the construction phase will only consist of grading the site. Additionally, the analysis found that the project would not be a significant source of Toxic Air contaminants or exceed the thresholds for carcinogenic risk, or acute or chronic hazard indices. Ultimately, the analysis found the project as a whole would not conflict with or obstruct any applicable air quality plans, impact sensitive receptors, or result in cumulatively considerable increases of criteria pollutants. The Air District reviewed the analysis and responded with no comments on October 8, 2024. The project will be subject to all applicable District rules and regulations. Additionally, a condition of approval will be added to the project to ensure consultation with the Air District takes place prior to issuance of any grading, encroachment, or building permit.

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

Potential impacts to air quality from the proposed project are also evaluated by Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. California



Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (a), defines VMT as the amount and distance of automobile travel attributable to a project. Stanislaus County has currently not adopted any significance thresholds for VMT, and projects are treated on a case-by-case basis for evaluation under CEQA. However, the State of California - Office of Planning and Research (OPR) has issued guidelines regarding VMT significance under CEQA. A technical advisory on evaluating transportation impacts in CEQA published by the Governor’s Office of Planning and Research (OPR) in December of 2018 clarified the definition of automobiles as referring to on-road passenger vehicles, specifically cars and light trucks. While heavy trucks are not considered in the definition of automobiles for which VMT is calculated for, heavy-duty truck VMT could be included for modeling convenience. According to the same OPR technical advisory, many local agencies have developed a screening threshold of VMT to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less than significant transportation impact. In the previously mentioned Health Risk Analysis by Yorke Engineering, truck trips associated with the project were estimated to generate a total of 649 VMT per-day or 237,012 VMT annually. Stanislaus County has not adopted specific standards related to VMT, but the Health Risk Analysis found impacts related to VMT to be less than significant. The proposed project will generate a low amount of vehicle trips with ten truck trips and eight passenger vehicle trips per-day. As this is below the District’s threshold of significance for vehicle and heavy truck trips, no significant impacts from vehicle and truck trips to air quality are anticipated.

Based on this information, the proposed project is expected to have a less than significant impact on air quality.

**Mitigation:** None.

**References:** Application information; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; Referral response received from San Joaquin Valley Air Pollution Control District, dated December 20, 2023; Correspondence received from San Joaquin Valley Air Pollution Control District, dated August 23, 2024; Email correspondence received from San Joaquin Valley Air Pollution Control District, dated October 8, 2024; Yorke Engineering Air Quality Impact Analysis and Health Risk Assessment, dated July 10, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

**Discussion:** It does not appear this project will result in impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors. There is no known sensitive or protected species or natural community located on the site. The project is located within the Turlock Quad of the California Natural Diversity Database.

Based on results from the California Natural Diversity Database (CNDDDB), there are seven animal species (excluding fish and mollusk species for which there is no feasible or potential habitat on the project site due to the lack of hydrological features) which are state or federally listed, threatened, or identified as species of special concern or a candidate of special concern within the Turlock California Natural Diversity Database Quad. These species include California tiger salamander-central California DPS, Swainson’s hawk, tricolored blackbird, least Bells vireo, Crotch’s bumblebee, Northern California legless lizard, and coast horned lizard. Within a 1.15-mile radius of the project site, the presence of the American bumblebee, Crotch’s bumblebee, and tricolored blackbird have been historically documented, but both species are presumed extant in the area since 1954 per the database. Further, the entire project site is already disturbed and improved with a single-family dwelling and accessory structures, and no rivers, creeks, ponds, or open canals exist on the project site. No construction is proposed as part of the project, and the project is not anticipated to have a significant impact on Biological Resources.

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

**Mitigation:** None.

**References:** Application information; California Department of Fish and Wildlife’s Natural Diversity Database Quad Species List; California Natural Diversity Database, Planning and Community Development GIS, accessed December 31, 2024; 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 pursuant to in § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?			X	
c) Disturb any human remains, including those interred outside of formal cemeteries?			X	

**Discussion:** It does not appear this project will result in significant impacts to any archaeological or cultural resources. The project site is developed with multiple structures and no new construction is proposed; however, conditions of approval will be placed on the project, requiring that any future construction activities shall be halted, if any resources are found, until appropriate agencies are contacted, and an archaeological survey is completed.

**Mitigation:** None.

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

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

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

No construction is proposed as part of this project. The applicant is proposing to establish a 1.5± acre area for a truck parking facility. Energy consuming equipment and processes include the equipment to initially gravel the truck parking facility. These activities would not require any substantial use of heavy-duty construction equipment, or significant increase in Vehicle Miles Traveled (VMT) and would require little or no demolition or grading as the site is presently unimproved and considered to be topographically flat. Consequently, emissions would be minimal and were projected to be less than significant in the Yorke Engineering Air Quality Impact Analysis discussed in Section III - *Air Quality*. However, should future construction occur, all construction activities shall be in compliance with all SJVAPCD regulations and with Title 24, Green Building Code, which includes energy efficiency requirements. Therefore, consumption of energy resources would be less than significant without mitigation for the proposed project.

The project was also referred to the San Joaquin Valley Air Pollution Control District, who provided a project referral response on December 20, 2023 indicating that the proposed project is below the District’s thresholds of significance for emissions from construction and operation. In the same response, the Air District required a Health Risk Assessment (HRA) be completed by the applicant and an Air Impact Assessment (AIA) application be submitted to them immediately to comply with District Rule 9510- Indirect Source Review (ISR). The District deemed the AIA application for the project complete on August 2, 2024. The HRA was submitted to the Air District on August 23, 2024, and further email correspondence received from the Air District on October 8, 2024 stated that the District had no comments on the submitted HRA.

No construction is proposed; however, any future construction would be subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The project was referred to the Turlock Irrigation District (TID) who serves the project site and surrounding area for electrical service. TID responded with no comments. Additionally, any future construction activities will be required to occur in compliance with all SJVAPCD regulations.

Energy consuming equipment and processes include construction equipment, trucks, and the employee vehicle. As discussed in Section III – *Air Quality*, these activities would not significantly increase Vehicle Miles Traveled (VMT), due to the number of vehicle trips not exceeding a total of 110 vehicle trips per-day. The proposed project will generate a low amount of vehicle trips with a total of ten heavy-truck trips (inbound and outbound trips for five trucks) and eight passenger vehicle trips (inbound and outbound trips for four employees) per-day. Stanislaus County has currently not adopted any standards or significance thresholds for VMT, but the previously mentioned Health Risk Analysis by Yorke Engineering found impacts related to VMT to be less than significant. The analysis found that the construction and operational phases of the proposed project would not exceed any of the District’s air quality thresholds for criteria pollutant emissions. Additionally, the project would not be a significant source of Toxic Air containments or exceed the thresholds for carcinogenic risk, or acute or chronic hazard indices. The trucks are the main consumers of energy associated with this project but will be subject to applicable Air District regulations, including rules and regulations that increase energy efficiency. Therefore, consumption of energy resources would be less than significant without mitigation for the proposed project.

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

**Mitigation:** None.

**References:** Application information; Referral response received from San Joaquin Valley Air Pollution Control District, dated December 20, 2023; Email correspondence received from San Joaquin Valley Air Pollution Control District, dated August 23, 2024; Email correspondence received from San Joaquin Valley Air Pollution Control District, dated October 8, 2024; Referral response from the Turlock Irrigation District, dated January 31, 2024; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; www.valleyair.org; San Joaquin Valley Air Pollution Control District’s Small Project Analysis Level (SPAL) guidance, November 13, 2020; Governor’s Office of Planning and Research Technical Advisory, December 2018; Yorke Engineering Air Quality Impact Analysis and Health Risk Assessment, dated July 10, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** The USDA Natural Resources Conservation Service’s Eastern Stanislaus County Soil Survey indicates that approximately 93.7 percent of the property is comprised of Grade 1 Dinuba sandy loam, 0 to 1 percent slopes (DrA), with the remaining 6.3 percent of the site being comprised of Grade 2 Hilmar loamy sand, 0 to 1 percent slopes (HfA). As contained in Chapter 5 of the General Plan Support Documentation, the areas of the County subject to significant geologic

hazard are located in the Diablo Range, west of Interstate 5; however, as per the California Building Code, all of Stanislaus County is located within a geologic hazard zone (Seismic Design Category D, E, or F) and a soils test may be required at building permit application. Results from the soils test will determine if unstable or expansive soils are present. If such soils are present, special engineering of the structure will be required to compensate for the soil deficiency. 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 or expansion of a septic tank or alternative wastewater 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 DER, who responded with no comments on the project. An early consultation referral response received from the Department of Public Works contained standard requirements that will be applied to the project as conditions of approval, such as an encroachment permit needing to be obtained for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right-of-way and all storm drainage facilities being designed using a 100-year, 24-hour storm and being capable of dewatering the 100-year, 24-hour storm within 48 hours

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

The proposed project is not expected to result in significant impacts to geology and soils.

**Mitigation:** None.

**References:** Application information; Referral response from the Department of Environmental Resources (DER) Environmental Health Division, dated December 22, 2023; Referral response from the Stanislaus County Department of Public Works dated April 15, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** The principal Greenhouse Gasses (GHGs) are carbon dioxide (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) design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. Two additional bills, SB 350 and SB32, were passed in 2015 further amending the states Renewables Portfolio Standard (RPS) for electrical generation and amending the reduction targets to 40% of 1990 levels by 2030.

The short-term emissions of GHGs during construction, primarily composed of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O, would be 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 future construction at this project site. As described above in Section III - *Air Quality*, the use of heavy-duty construction equipment would be very limited; therefore, the emissions of CO<sub>2</sub> from future construction would be less than significant. While no construction is proposed, any future construction resulting from the project would be required to meet mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures, of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11)

which includes minimum statewide standards to significantly reduce GHG emissions from new construction. Any future construction activities associated with this project are considered to be less than significant as they are temporary in nature and are subject to meeting San Joaquin Valley Air Pollution Control District (SJVAPCD) standards for emissions.

Direct emissions of GHGs from the operation of the proposed project are primarily due to the employee vehicle trips and truck trips. As required by California Environmental Quality Act (CEQA) Guidelines section 15064.3, potential impacts regarding Green House Gas Emissions should be evaluated using Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. Total vehicle trips as a result of this project will not exceed 110 trips per-day. As discussed in Section III – *Air Quality*, the proposed project will generate a total of ten truck trips (inbound and outbound trips for five trucks) and eight passenger vehicle trips (inbound and outbound trips for four employees) per-day, below the OPR threshold. Stanislaus County has currently not adopted any standards or significance thresholds for VMT, but the previously mentioned Health Risk Analysis by Yorke Engineering found impacts related to VMT to be less than significant. The analysis found that the construction and operational phases of the proposed project would not exceed any of the District’s air quality thresholds for criteria pollutant emissions. Additionally, the project would not be a significant source of Toxic Air containments or exceed the thresholds for carcinogenic risk, or acute or chronic hazard indices. Consequently, GHG emissions are considered to be less than significant.

The project was referred to the SJVAPCD, who provided a project referral response on December 20, 2023 indicating that the proposed project is below the District’s thresholds of significance for emissions from construction and operation. In the same response, the Air District required a Health Risk Assessment (HRA) be completed by the applicant and an Air Impact Assessment (AIA) application be submitted to them immediately to comply with District Rule 9510- Indirect Source Review (ISR). The District deemed the AIA application for the project complete on August 2, 2024. The HRA was submitted to the Air District on August 23, 2024, and further email correspondence received from the Air District on October 8, 2024 stated that the District had no comments on the submitted HRA. Staff will include a condition of approval on the project requiring that the applicant be in compliance with the SJVAPCD’s rules and regulations.

Less than significant impacts from greenhouse gas emissions occurring are anticipated as a result of this project.

**Mitigation:** None.

**References:** Application information; Referral response received from San Joaquin Valley Air Pollution Control District, dated December 20, 2023; Email correspondence received from San Joaquin Valley Air Pollution Control District, dated August 23, 2024; Email correspondence received from San Joaquin Valley Air Pollution Control District, dated October 8, 2024; Yorke Engineering Air Quality Impact Analysis and Health Risk Assessment, dated July 10, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

<p>e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?</p>			X	
<p>f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>			X	
<p>g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</p>			X	

**Discussion:** The County Department of Environmental Resources is responsible for overseeing hazardous materials and has not indicated any particular concerns in this area. This project was referred to the Department of Environmental Resources – Hazardous Materials and Environmental Health Divisions, who responded with no comments.

Pesticide exposure is a risk in areas located in the vicinity of agriculture. Sources of exposure include contaminated groundwater from drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. Additionally, agricultural buffers are intended to reduce the risk of spray exposure to surrounding people. The nearest properties in production agriculture with records of pesticide use are the adjacent parcels directly to the east and west of the project site.

As Stated in Section II – *Agricultural and Forest Resources*, four employees will access the site per-day and generate up to ten truck trips (inbound and outbound trips for five trucks) and eight passenger vehicle trips (inbound and outbound trips for four employees) and no customer visits per-day. Proposed hours of operation are twenty-four hours a day, seven days a week. The project was referred to the Stanislaus County Agricultural Commissioner, who regulates pesticide use, and no comments have been received to date.

The project site is not listed on the EnviroStor database managed by the CA Department of Toxic Substances Control. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by Turlock Rural Fire Protection District.

The project is not anticipated to interfere with the Stanislaus County Local Hazard Mitigation Plan, which identifies risks posed by disasters and identifies ways to minimize damage from those disasters.

The project site is not within the vicinity of any wildlands. The project site is located approximately 660± feet away from Turlock Airpark, a private use airstrip that is not within an airport land use plan. Noise-related impacts on the project site and surrounding areas from this airstrip are expected to be less than significant. The proposed use is not recognized as a generator and/or consumer of hazardous materials, therefore no significant impacts associated with hazards or hazardous materials are anticipated to occur as a result of the proposed project.

**Mitigation:** None.

**References:** Application information; Referral response from the Department of Environmental Resources (DER) Hazardous Materials Division, dated December 18, 2023; Referral response from the Department of Environmental Resources (DER) Environmental Health Division, dated December 22, 2023; Department of Toxic Substances Control's Data Management System (EnviroStar); Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act (FEMA). The project site is located in FEMA Flood Zone X, which includes areas determined to be outside the 0.2% annual chance floodplains. All flood zone requirements will be addressed by the Building Permits Division during the building permit process. The project proposes to maintain stormwater on-site via overland runoff. As part of the building permit review process, the Department of Environmental Resources (DER) will evaluate the existing wastewater treatment systems (OWTS), and the site's adherence to current Local Agency Management Program (LAMP) standards. LAMP standards include minimum setback from wells to prevent negative impacts to groundwater quality. The site is currently served by a private septic system and well. No new wells or septic tanks are proposed as part of this request. Any future wells constructed on-site will be subject to review under the County's Well Permitting Program, which will determine whether a new well will require environmental review. The project was referred to DER, who provided no comment on the project. All applicable standards under Public Works and the DER will be addressed under the building permit review process for any future construction as well.

An early consultation referral response received from the Department of Public Works contained standard conditions of approval that will be applied to the project such as an encroachment permit needing to be obtained for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right-of-way and all storm drainage facilities being designed using a 100-year, 24-hour storm and capable of dewatering the 100-year, 24-hour storm within 48 hours.

The Sustainable Groundwater Management Act (SGMA) was passed in 2014 with the goal of ensuring the long-term sustainable management of California's groundwater resources. SGMA requires agencies throughout California to meet certain requirements including forming Groundwater Sustainability Agencies (GSA), developing Groundwater Sustainability



Plans (GSP) and achieving balanced groundwater levels within 20 years. The site is located in the West Turlock Subbasin GSA. The East Turlock Subbasin GSA and West Turlock Subbasin GSA collaboratively developed one GSP to manage groundwater sustainably through at least 2042. The GSAs adopted the Turlock Subbasin GSP on January 6, 2022, and submitted the GSP to the California Department of Water Resources (DWR) on January 28, 2022. On January 18, 2024, the California DWR provided comments on the Turlock Subbasin’s Groundwater Sustainability Plan (GSP) following a two-year review period. The Turlock Subbasin’s GSP was determined to be incomplete by DWR and is required to be revised within 180 days. The final revised GSP was subsequently submitted to DWR. The proposed truck parking facility will be subject to the requirements of the GSP for the region which was adopted to minimize impacts to groundwater supplies. The project was referred to the West Turlock Subbasin GSA, and no comments were received regarding the proposed project.

Stanislaus County adopted a Groundwater Ordinance in November 2014 (Chapter 9.37 of the County Code, hereinafter, the “Ordinance”) that codifies requirements, prohibitions, and exemptions intended to help promote sustainable groundwater extraction in unincorporated areas of the County. The Ordinance prohibits the unsustainable extraction of groundwater and makes issuing permits for new wells, which are not exempt from this prohibition, discretionary. For unincorporated areas covered in an adopted GSP pursuant to SGMA, the County can require holders of permits for wells it reasonably concludes are withdrawing groundwater unsustainably to provide substantial evidence that continued operation of such wells does not constitute unsustainable extraction and has the authority to regulate future groundwater extraction. The site has an existing private well and septic system. There are no additional wells proposed as part of this request.

The project was referred to DER’s Groundwater Resources Division, who responded with no comments on the project.

The project was referred to the Central Valley Regional Water Quality Control Board (RWQCB), who did not respond with comments on the project.

The project site is located within the service boundaries of the Turlock Irrigation District (TID). The project was referred to TID, who responded with no comments.

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

**Mitigation:** None

**References:** Application information; Referral response from the Department of Environmental Resources (DER) Groundwater Resources Division, dated January 2, 2024; Referral response from the Department of Environmental Resources (DER) Environmental Health Division, dated December 22, 2023; Referral response from the Turlock Irrigation District, dated January 31, 2024; Referral response from the Stanislaus County Department of Public Works dated April 15, 2024; Sustainable Groundwater Management Act; Stanislaus County Code Title 9 Chapter 9.37 Groundwater; Turlock Subbasin Groundwater Sustainability Plan, revised July 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** The project site is designated Agriculture by the Stanislaus County General Plan land use diagrams and zoned General Agriculture (A-2-10). The project is a request to permit an existing truck parking facility for up to 12 tractors and 24 trailers, on a 1.5± acre portion of a 10.3± acre parcel. Four individuals will be employed and generate up to ten truck trips (inbound and outbound trips for five trucks) and eight passenger vehicle trips (inbound and outbound trips for four employees) per-day. Proposed hours of operation are twenty-four hours a day, seven days a week.

Within the General Agriculture (A-2) zoning district, the County has determined that certain uses not directly related to agriculture may be necessary to serve the A-2 district or may be difficult to locate in an urban area. The County allows the parking of tractor-trailer combinations if specific criteria can be met and if the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity, that it will not create a concentration of commercial and industrial uses in the vicinity. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not 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.

As allowed under Section 21.020.030G of the Stanislaus County Zoning Ordinance, the A-2 zoning district permits the parking of up to 12 tractor-trailer combinations with a use permit, provided that at least one of the combinations shall be registered to the property owner and the property owner shall live on the parcel, the total number of tractors shall not exceed 12 and the total number of trailers shall not exceed two per tractor, the parcel is at least one acre in size, and the parking area does exceed 1.5± acres nor exceed 50% of the total parcel. Based on the specific features and design of this project, it does not appear this project will impact the long-term productive agricultural capability of surrounding contracted lands in the A-2 zoning district. There is no indication this project will result in the removal of adjacent contracted land from agricultural use. Additionally, subsection 21.020.030(G)(2) requires that the truck parking establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity. It is the Planning Commission's discretion as to whether a concentration is met as a concentration is not defined in County Codes.

As Stated in Section II – *Agricultural and Forest Resources*, the project is not subject to agricultural buffer requirements as the proposed use consists of parking facilities for tractor-trailers. The project was referred to the Stanislaus County Agricultural Commissioner, and no comments have been received to date. The request is not expected to result in any significant conversion of farmland to non-agriculture use. No impacts to agriculture are anticipated to occur as a result of this project as the project site is currently developed with residential and accessory structures and considered topographically flat.

The County's General Plan Land Use Element Sphere of Influence policy states that any development, other than agricultural uses and churches, which requires discretionary approval and is within the sphere of influence of cities, shall not be approved unless first approved by the city within whose sphere of influence it lies or by the city for which areas of specific designation were agreed. Development requests within the spheres of influence or areas of specific designation of any incorporated city shall not be approved unless the development is consistent with agreements with the cities which are in effect at the time of project consideration. Such development must meet the applicable development standards of the affected city as well as any public facilities fee collection agreement in effect at the time of project consideration. The project site is located directly south of the City of Turlock city limits. While the site is not located within Turlock's Local Agency Formation Commission (LAFCO)-adopted Sphere of Influence (SOI). However, it is located within Turlock's adopted general plan area and is within one mile of Turlock's adopted sphere of influence. The Stanislaus County General Plan Land Use Element Policy 27 requires all discretionary projects outside the sphere of influence of cities, but located within one mile of a city's adopted sphere of influence, and within a city's adopted general plan area, to be referred out to the city for consideration; however, the County reserves the right for final discretionary action. The project was referred to the City of Turlock, and no response has been received to date.

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

**Mitigation:** None.

**References:** Application information; Stanislaus County Zoning Ordinance (Title 21); Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

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

**Mitigation:** None.

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

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

**Discussion:** The Stanislaus County General Plan identifies noise levels up to 75 dB Ldn (or CNEL) as the normally acceptable level of noise for industrial and agricultural uses. The Stanislaus County General Plan identifies noise levels for residential or other noise-sensitive land uses of up to 55 hourly Leq, dBA and 75 Lmax, dBA from 7:00 a.m. to 10:00 p.m. and 45 hourly Leq, dBA and 65 Lmax, dBA from 10:00 p.m. to 7:00 a.m. Pure tone noises, such as music, shall be reduced by five dBA; however, when ambient noise levels exceed the standards, the standards shall be increased to the ambient noise levels. The proposed hours of operation are Monday through Sunday, from 8:00 a.m. to 5:00 p.m. The nearest sensitive noise receptor is a residence 290-feet away. Noise impacts associated with on-site activities and traffic are not anticipated to exceed the normally acceptable level of noise. The site itself is impacted by the noise generated from traffic on East Greenway Avenue and farming operations in the surrounding area. Noise impacts associated with on-site activities will include trucks entering and exiting the property and the idling of engines. Such uses should be under the threshold established by the General Plan. Although the applicant would not be restricted on the number of truck trips for the operation, a condition of approval, prohibiting the idling of trucks for any period of time beyond the absolute minimum necessary to bring engines to safe operating conditions, will be added to the project to ensure that the operation does not exceed the 75 dB Ldn (or CNEL).

The site is not located within an airport land use plan. As discussed in Section IX – Hazards and Hazardous Materials, the project site is located approximately 660± feet away from Turlock Airpark, a private use airstrip that is not within an airport land use plan. Noise-related impacts on the project site and surrounding areas from this airstrip are expected to be less than significant. Noise impacts associated with the proposed project are considered to be less than significant.

**Mitigation:** None.

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

<b>XIV. 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>
<b>a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?</b>			X	
<b>b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?</b>			X	

**Discussion:** The site is not included in the vacant sites inventory for the 2016 Stanislaus County Housing Element, which covers the 5<sup>th</sup> cycle Regional Housing Needs Allocation (RHNA) or the draft 2023 6<sup>th</sup> cycle RHNA for the County and will therefore not impact the County’s ability to meet their RHNA. No population growth will be induced nor will any existing housing be displaced as a result of this project.

**Mitigation:** None.

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

<b>XV. 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>
<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:</b>			X	
<b>Fire protection?</b>			X	
<b>Police protection?</b>			X	
<b>Schools?</b>			X	
<b>Parks?</b>			X	
<b>Other public facilities?</b>			X	

**Discussion:** The project site is served by the Turlock Rural Fire Protection District for fire protection, the Stanislaus County Sheriff’s Office for police protection, Turlock Unified School District for schools, Stanislaus County for parks, and

Turlock Irrigation District (TID) for irrigation and electrical service. The project was referred to TID, who responded with no comments.

The project was referred to the Central Valley Regional Water Quality Control Board (CVRWQCB), and no response has been received to date.

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

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

**Mitigation:** None.

**References:** Application information; Referral response from the Turlock Irrigation District, dated January 31, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

<b>XVI. RECREATION --</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) <b>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?</b>			X	
b) <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?</b>			X	

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

**Mitigation:** None.

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

<b>XVII. TRANSPORTATION -- 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) <b>Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?</b>			X	
b) <b>Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?</b>			X	
c) <b>Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</b>			X	
d) <b>Result in inadequate emergency access?</b>			X	

**Discussion:** The project is a request to permit an existing truck parking facility for up to 12 tractors and 24 trailers, on a 1.5-acre portion of a 10.3± acre parcel, in the General Agriculture (A-2-10) zoning district. The project takes access from County-maintained East Greenway via driveways: one paved driveway which provides access to the single-family dwelling which is lined with four-foot-tall chain link fencing and shrubs, and a second driveway which is graveled and provides access for the trucks and is lined with redwood trees. The trucks will have access to the site twenty-four hours a day, seven days a week, with a maximum of four employees accessing the site per-day. The employees will leave their vehicles on-site. No customer service is proposed at the project site. No hauled materials will be brought back to the site, and the trucks will be left empty when parked on-site between trips. It is not anticipated that the project would substantially affect the level of service on East Greenway Avenue.

Potential impacts to transportation from the proposed project are also evaluated by Vehicle Miles Traveled (VMT). The calculation of VMT is the number of cars/trucks multiplied by the distance traveled by each car/truck. California Environmental Quality Act (CEQA) Guidelines Section 15064.3, subdivision (a), defines VMT as the amount and distance of automobile travel attributable to a project. A technical advisory on evaluating transportation impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December of 2018 clarified the definition of automobiles as referring to on-road passenger vehicles, specifically cars and light trucks. While heavy trucks are not considered in the definition of automobiles for which VMT is calculated for, heavy-duty truck VMT could be included for modeling convenience. According to the same OPR technical advisory, many local agencies have developed a screening threshold of VMT to indicate when detailed analysis is needed. Absent substantial evidence indicating that a project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or General Plan, projects that generate or attract fewer than 110 trips per-day generally may be assumed to cause a less than significant transportation impact. In the previously mentioned Health Risk Analysis by Yorke Engineering, truck trips associated with the project were estimated to generate a total of 649 VMT per-day or 237,012 VMT annually based on ten one-way truck trips per-day. The proposed project will generate eight passenger vehicle trips one-way per-day, and ten truck trips one-way per-day. As this is below the screening threshold of significance for vehicle and heavy truck trips, no significant impacts from vehicle and truck trips to transportation are anticipated. As discussed in Section III – *Air Quality*, Stanislaus County has currently not adopted any standards or significance thresholds for VMT, but the previously mentioned Health Risk Analysis by Yorke Engineering found impacts related to VMT to be less than significant.

This project was referred to the Stanislaus County Department of Public Works and the California Department of Transportation (Caltrans). Only the County's Public Works provided comments that will be applied as conditions of approval to the project, including: that no parking, loading, or unloading of vehicles being permitted within the County road right-of-way, the storage depth of any gate being adequate for trucks coming off the road, the developer being required to install or pay for the installation of any signs and/or markings (which are not proposed), and an Encroachment Permit needing to be obtained for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right-of-way. Public Works did not identify any environmental concerns or potentially significant impacts with regards to transportation.

The proposed project is not anticipated to conflict with any transportation program, plan, ordinance or policy. Transportation impacts associated with the project are considered to be less than significant.

**Mitigation:** None.

**References:** Application information; Referral response from the Stanislaus County Department of Public Works dated April 15, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** It does not appear that this project will result in significant impacts to any archaeological or cultural resources. The project does not include any construction or ground-disturbance. In accordance with SB 18 and AB 52, this project was not referred to the tribes listed with the Native American Heritage Commission (NAHC) as the project is not a General Plan Amendment and no tribes have requested consultation or project referral noticing. A condition of approval regarding the discovery of cultural resources during any future construction process will be added to the project.

**Mitigation:** None.

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

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

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

**Discussion:** Limitations on providing services have not been identified. The project proposes to utilize an existing private well for water and an existing septic system for wastewater service. No new construction, wells or septic systems are proposed. The project was referred to the Department of Environmental Resources (DER) Environmental Health, Groundwater Resources, and Hazardous Materials Divisions, all of which responded with no comments on the project.

Although no construction is proposed, DER, Public Works, and the Building Permits Division review and approve any building or grading permit to ensure their standards are met. Conditions of approval regarding these standards will be applied to the project and will be triggered when a building permit is requested.

Stormwater is proposed to be maintained on-site via overland runoff.

No washing of trucks is proposed, and any maintenance on-site will be limited to tire changes, light and windshield wiper replacements, and checking fluids. Accordingly, additional wastewater discharge is not anticipated to occur as a result of this project.

A referral response received from Public Works included standard conditions of approval that will be applied to the project such as an encroachment permit needing to be obtained for driveway approaches at all points of ingress and egress on the project site and any other work done within the County right-of-way and all storm drainage facilities being designed using a 100-year, 24-hour storm and being capable of dewatering the 100-year, 24-hour storm within 48 hours.

The project site is currently served by the Turlock Irrigation District (TID) for irrigation water. The project was referred to TID, who responded with no comments.

The project was referred to the Central Valley Regional Water Quality Control Board (CVRWQCB), and no response has been received to date.

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

**Mitigation:** None.

**References:** Application information; Referral response from the Department of Environmental Resources (DER) Groundwater Resources Division, dated January 2, 2024; Referral response from the Department of Environmental Resources (DER) Environmental Health Division, dated December 22, 2023; Referral response from the Department of Environmental Resources (DER) Hazardous Materials Division, dated December 18, 2023; Referral response from the Turlock Irrigation District, dated January 31, 2024; Referral response from the Stanislaus County Department of Public Works dated April 15, 2024; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	



<p>c) Require the installation of maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?</p>			X	
<p>d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</p>			X	

**Discussion:** The Stanislaus County Local Hazard Mitigation Plan identifies risks posed by disasters and identifies ways to minimize damage from those disasters. With the Wildfire Hazard Mitigation Activities of this plan in place, impacts to an adopted emergency response plan or emergency evacuation plan are anticipated to be less than significant. The terrain of the site is relatively flat, and the site has access to County-maintained East Greenway Avenue. The site is located in a Local Responsibility Area (LRA) for fire protection and is served by the Turlock Rural Fire Protection District. California Building and Fire Code establishes minimum standards for the protection of life and property by increasing the ability of a building to resist intrusion of flame and burning embers. No construction is proposed; however, any future construction will be subject to building permits and will be reviewed by the County’s Building Permits Division and Fire Prevention Bureau to ensure all State of California Building and Fire Code requirements are met prior to construction.

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

**Mitigation:** None.

**References:** Application information; California Fire Code Title 24, Part 9; California Building Code Title 24, Part 2, Chapter 7; Stanislaus County Local Hazard Mitigation Plan; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

**Discussion:** The 10.3± acre project parcel is designated Agriculture by the Stanislaus County General Plan land use diagrams and zoned General Agriculture (A-2-10). Approximately 1.5±-acres of the southeastern portion of the project site that has already been developed with a single-family dwelling and agricultural storage building is classified as “Rural

Residential Land” by the California Department of Conservation’s Farmland Mapping and Monitoring Program. 8.2±-acres of the site is classified as “Farmland of Statewide Importance,” with an 0.6±-acre portion in the southwest corner of the property classified as “Prime Farmland”. The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Web Soil Survey indicates that approximately 93.7 percent of the project site is comprised of Grade 1 Dinuba sandy loam, 0 to 1 percent slopes (DrA). The remaining portion of the project site is comprised of Grade 2 Hilmar loamy sand, 0 to 1 percent slopes (HfA). The parcel is not enrolled in a Williamson Act Contract. While the site’s soils are characterized as prime farmland under the County’s Uniform Rules, it is not currently improved with any production agriculture and has not been for several years. The proposed project will not permanently convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use.

As was mentioned in Section XI - *Land Use and Planning*, within the A-2 zoning district, the County has determined that certain uses not directly related to agriculture may be necessary to serve the A-2 district or may be difficult to locate in an urban area. The County allows the parking of tractor-trailer combinations if specific criteria can be met and if the establishment, as proposed, will not be substantially detrimental to, or in conflict with, the agricultural use of other property in the vicinity, that it will not create a concentration of commercial and industrial uses in the vicinity. In addition, the Planning Commission must find that the establishment, maintenance, and operation of the proposed use is consistent with the General Plan and will not 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.

The proposed project will generate a low amount of vehicle trips with eight passenger trips per-day and ten heavy-truck trips (inbound and outbound trips for five trucks) per-day. Accordingly, no significant impacts from vehicle and truck trips to transportation are anticipated.

The surrounding area is comprised of scattered rural ranchettes and agricultural uses in all directions, State Route 165 and the Turlock Airpark private airstrip to the west, a group home to the east, State Route 99 to the north and east, and the County of Merced to the south. The group home located on the adjoining parcel to the east was permitted in 2001 under General Plan Amendment No. 2001-8 and Rezone No. 2001-14 – *Creative Alternatives, Inc.*

Additionally, there are a number of commercial truck parking facilities that have developed in the unincorporated areas surrounding Keyes, south and west Turlock, and along major roadways feeding into the State Route (SR) 99 corridor. Within the south Turlock area, and within a 1.5-mile radius of the project site, there are 11 truck parking facilities that have been documented as of 2024. These facilities include one approved truck parking facility permitted to park up to 12 tractor-trailer combinations, located two parcels to the west (Use Permit No. PLN2016-0029 – *Grewal Truck Parking*); nine unpermitted truck parking facilities (of which one has an application for a use permit to park up to 12 tractor-trailer combinations in review: Use Permit Application No. PLN2024-0084 – *Jasson Trucking*) to the west, south and east; and one facility north of SR-99 permitted under the Industrial (M) zoning of the site, but requiring ministerial development permits (such as a building permit, encroachment permit, and grading permit). It is the Planning Commission’s discretion as to whether a concentration is met as a concentration is not defined in County Codes. Any truck parking facility on A-2-zoned property which proposed parking of more than three tractors and three trailers is subject to a use permit and discretionary environmental review. Along with the approved Grewal Truck Parking facility, if the two proposed truck parking facility with current applications under review are approved, they are not anticipated to cumulatively contribute in significant impacts as the facilities would each be limited to a total of 12 tractors with combined vehicle trips of 66, not exceeding air, transportation, or other environmental thresholds. The eight other documented commercial tractor-trailer parking facilities that are unpermitted and without land use entitlements under consideration would require permits to be submitted for consideration, either a use permit if they meet the criteria of County Code Section 21.20.030(G) or a general plan amendment and rezone if these requirements are exceeded. Otherwise, these sites are presently subject to code enforcement action to abate the uses as unpermitted facilities.

The land surrounding the project site is zoned A-2, and are subject to the permitted uses of the A-2 zoning district. Any use requiring land use entitlements would be subject to further environmental review, application of conditions of approval and necessary mitigation, and discretionary vote by the decision-making body, either the Planning Commission or Board of Supervisors.

The project site is not located within Turlock’s LAFCO-adopted Sphere of Influence (SOI). However, it is located within Turlock’s adopted general plan area and is within one mile of Turlock’s adopted sphere of influence. Accordingly, the project was referred to the City of Turlock, and no response has been received to date.

The project requests to be served by an existing well and septic system; however, no impacts with respect to either have been raised. No construction is proposed as part of the project.

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

**Mitigation:** None.

**References:** Initial Study; Stanislaus County General Plan and Support Documentation<sup>1</sup>.

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

July 10, 2024

Mr. Raj Bhullar  
Owner  
Lucky Star Logistics Inc.  
Work (209) 445-4431  
E-mail: [Bhullar0135@Gmail.com](mailto:Bhullar0135@Gmail.com)

**Subject: CalEEMod Air Quality and Greenhouse Gas Study, SJVAPCD Rule 9510  
Indirect Source Review and Risk Prioritization Scoring for a Truck Parking  
Area in Turlock, CA**

Dear Mr. Bhullar:

Yorke Engineering, LLC (Yorke) is pleased to provide this technical letter report which includes the Air Quality (AQ) and Greenhouse Gas (GHG) CEQA significance evaluation, San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 9510 summary, and a health risk screening assessment for the project operations. This report provides California Emissions Estimator Model<sup>®</sup> (CalEEMod) emissions estimates, criteria pollutant analysis, and GHG analysis estimates for the proposed truck parking area in Turlock, California. The Project site is in Stanislaus County, which is within the jurisdiction of the SJVAPCD. These evaluations will support an Initial Study (IS) or a Mitigated Negative Declaration (MND) from the County under the California Environmental Quality Act (CEQA).

## **PROJECT DESCRIPTION**

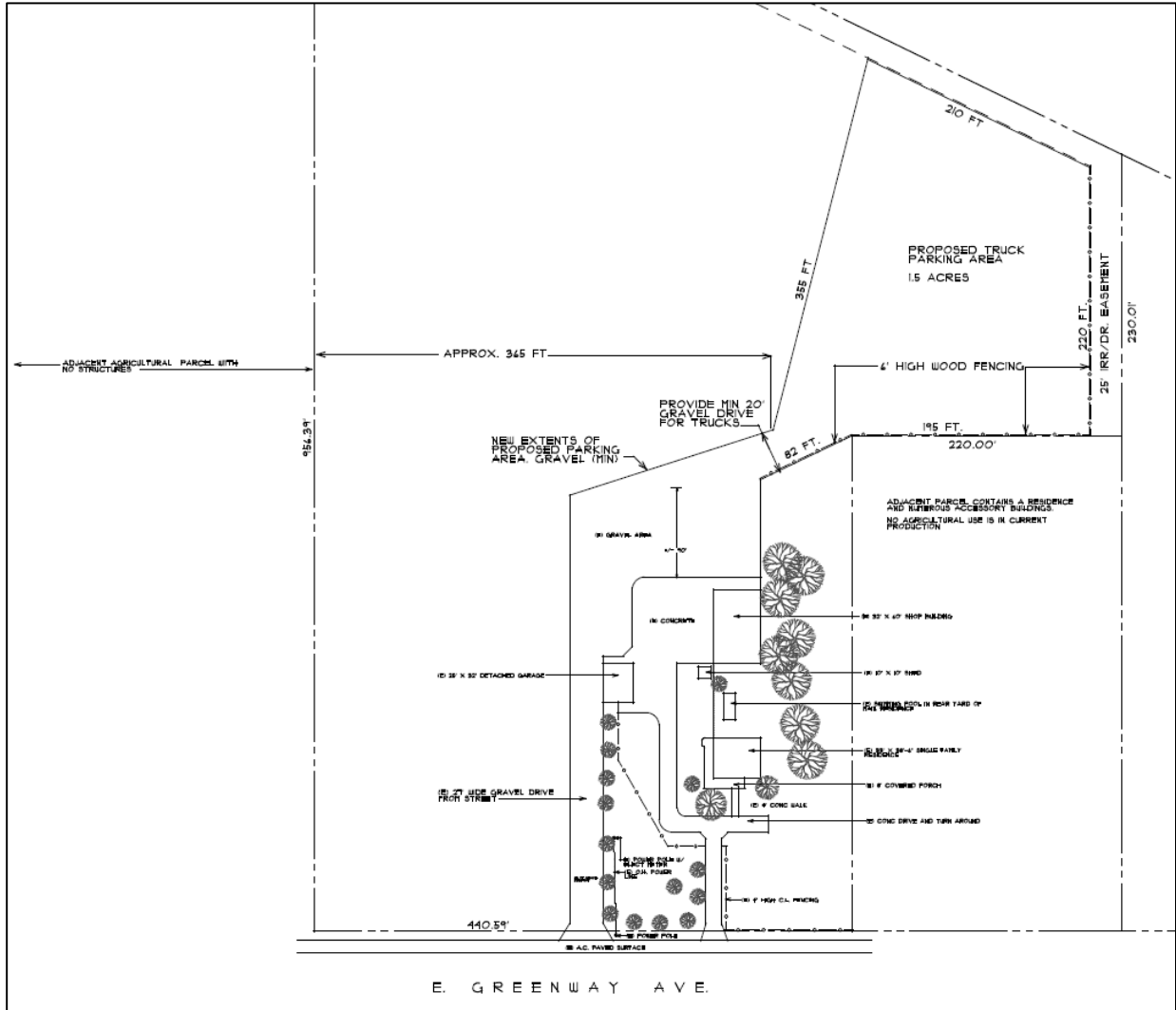
The proposed Project is located at 1005 East Greenway Avenue, adjacent to State Route (SR) 99, in the City of Turlock, CA (the City) and involves the development of truck parking for 12 truck-tractors and up to 24 trailers on 1.5 acres. Minor maintenance activities will also occur at the Project site. There is an existing single-family residential building, detached garage, and shop building at the Project site. The new site would replace its existing operation at 2001 Grayson Road in Ceres which is located approximately 9 miles northwest of the new proposed site. Activities would relocate from the old site once the new site is operational. As such, emissions occurring at the new site are currently existing within the air basin. For purposes of providing a conservative analysis of potential Project air quality impacts, activities at the proposed Project site are treated as new activities even though they would be relocated from an existing facility.

The nearest residential use is located adjacent to the site to the south. The proposed truck parking is located 225 feet from the nearest offsite residential structure.

**Figure 1: Project Vicinity Map**



**Figure 2: Project Site Plan**



## ASSUMPTIONS

The following basic assumptions were used in developing the emission estimates for the proposed Project using CalEEMod:

- CalEEMod defaults were applied to all phases of the Project, unless otherwise specified.
- Analysis calculated using a worst-case total of 10 vehicle trips (five truck project site ingress and five egress) which would occur on a daily basis based on information provided by the developer.
- The existing truck trips provide intra- and interstate travel. To provide a conservative analysis of potential truck related emissions an average one-way travel distance of 130 miles was used for every truck trip. 130 miles was measured as the average distance from the Project to the edge of the jurisdictional boundary of the SJVAPCD.
- Emission rates were modified to only include heavy-heavy duty trucks consistent with the design of the truck parking.
- Construction only includes the paving phase related to the anticipated gravelling activities and truck loads based on information provided by the developer.
- During the site preparation and paving phases of construction, it is anticipated that no soil will need to be exported from or imported to the Project site.

## AIR QUALITY IMPACTS ANALYSES

Appendix G of the California Environmental Quality Act (CEQA) Guidelines contains an Environmental Checklist Form which consists of a series of questions necessary for public disclosure of potential environmental impacts of a land use development project. In order to evaluate the questions in the Air Quality Sections of the checklist, quantitative significance criteria established by the local air quality agency, such as SJVAPCD, may be relied upon to make significance determinations based on emissions of criteria pollutants and GHGs.

### Project Emissions Estimation

The construction and operation analysis were performed using California Emissions Estimator Model (CalEEMod) version 2022.1.1.24. CalEEMod is the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant and GHG emissions associated for both the construction and operations of land use development projects. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the SJVAPCD, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), and other California air districts. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The model also identifies project design features, regulatory measures, and control (mitigation) measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from the selected measures. Default land use data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) were provided by the various California air districts to account for local requirements and conditions. As the official assessment methodology for land use projects in California, CalEEMod is relied

upon herein for construction and operational emissions quantification, which forms the basis for the impact analysis.

Based on information received from the Applicant, land use data for CalEEMod input is presented in Table 1. The total Project area is 1.5 acres. The SJVAPCD quantitative significance thresholds shown in Table 2 were used to evaluate Project emissions impacts (SJVAPCD 2015a,b,c).

Table 1: Land Use Data for CalEEMod Input			
Project Element	Land Use Type	Land Use Subtype	Lot Acreage (footprint)
Truck Parking	Parking	Parking Lot	1.5

Source: Applicant 2024, CalEEMod version 2022.1.1.24

Notes:

Electric Utility - Turlock Irrigation District

1 acre = 43,560 sf

Construction start date: 09/01/2024

Operational year: 2024

Table 2: SJVAPCD CEQA Thresholds of Significance		
Pollutant	Annual Threshold*	APR-2030 Threshold**
	tons/yr	lbs/day
VOC	10	100
NO <sub>x</sub>	10	100
CO	100	100
SO <sub>x</sub>	27	100
PM <sub>10</sub>	15	100
PM <sub>2.5</sub>	15	100
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximally Exposed Individual risk equals or exceeds 20 in one million	
	Acute: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual	
	Chronic: Hazard Index equals or exceeds 1 for the Maximally Exposed Individual	
Greenhouse Gases	Implement Best Performance Standards (BPS) (see Discussion)	
	Reduce Project GHG Emission by 29% over Business as Usual (see Discussion)	

Source: SJVAPCD 2015a,b; 2018; 2009a,b

\*Construction or operation



**Criteria Pollutants from Project Construction**

A project’s construction phase produces many types of emissions, but PM<sub>10</sub> and PM<sub>2.5</sub> in fugitive dust and diesel engine exhaust are the pollutants of greatest concern. Fugitive dust emissions can result from a variety of construction activities, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. Construction-related emissions can cause substantial increases in localized concentrations of PM<sub>10</sub>, as well as affecting PM<sub>10</sub> compliance with ambient air quality standards on a regional basis. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The use of diesel-powered construction equipment emits ozone precursors oxides of nitrogen (NO<sub>x</sub>) and reactive organic gases (ROG), and diesel particulate matter (DPM). Use of architectural coatings and other materials associated with finishing buildings may also emit ROG. As discussed previously, the SJVAPCD has developed annual and daily significance thresholds for use in CEQA disclosure documents. Project emissions are evaluated against these annual thresholds in Table 3 and compared against the daily emission thresholds in Table 4. As shown in these Tables, Project related construction emissions are below both the annual and daily emission thresholds and would result in less than significant impacts to air quality from contributions to emissions in the air basin.

PROJECTED IMPACT: Less Than Significant

<b>Table 3: Construction Emissions Summary and Annual Significance Thresholds</b>			
<b>Criteria Pollutants</b>	<b>Project Emissions</b>	<b>Threshold</b>	<b>Significance</b>
	<b>tons/yr</b>	<b>tons/yr</b>	
ROG (VOC)	<1	10	LTS
NO <sub>x</sub>	<1	10	LTS
CO	<1	100	LTS
SO <sub>x</sub>	<1	27	LTS
Total PM <sub>10</sub>	<1	15	LTS
Total PM <sub>2.5</sub>	<1	15	LTS

Sources: Applicant 2023, SJVAPCD 2015a,b,c; CalEEMod

Notes:

Tons/yr includes winter or summer maxima for planned land use

Total PM<sub>10</sub> / PM<sub>2.5</sub> comprises fugitive dust plus engine exhaust

LTS - Less Than Significant

<b>Table 4: Construction Emissions Summary and Daily Significance Thresholds</b>			
<b>Criteria Pollutants</b>	<b>Project Emissions</b>	<b>Threshold</b>	<b>Significance</b>
	<b>lbs/day</b>	<b>lbs/day</b>	
ROG (VOC)	<1	100	LTS
NO <sub>x</sub>	4	100	LTS
CO	3	100	LTS
SO <sub>x</sub>	<1	100	LTS
Total PM <sub>10</sub>	<1	100	LTS
Total PM <sub>2.5</sub>	<1	100	LTS

Sources: Applicant 2023, SJVAPCD 2015a,b,c; CalEEMod

Notes:

Lbs./day includes winter or summer maxima for planned land use

Total PM<sub>10</sub> / PM<sub>2.5</sub> comprises fugitive dust plus engine exhaust

LTS - Less Than Significant

***Criteria Pollutants from Project Operation***

The term “project operations” refers to the full range of activities that can or may generate criteria pollutant when the project is operating in its intended use. For projects, such as office parks, shopping centers, apartment buildings, residential subdivisions, and other indirect sources, motor vehicles traveling to and from the project represent the primary source of air pollutant emissions. For industrial projects and some commercial projects, equipment operation and manufacturing processes, i.e., permitted stationary sources, can be of greatest concern from an emissions standpoint. The Project entails the use of a truck parking area that generally does not have any activity. Emissions from the Project are evaluated against the CEQA significance thresholds address potential impacts of operational emission sources on regional air quality.

***Results of Criteria Emissions Analyses***

The results of the criteria emissions analyses provides an estimate of Project related operations phase emissions. Table 5 shows unmitigated and mitigated criteria operational emissions and evaluates these emissions against the annual SJVAPCD significance thresholds while Table 6 provides an evaluation against the daily SJVAPCD significance thresholds for development projects. As shown in Tables 5 and 6, mass emissions of criteria pollutants from construction and operation are below applicable SJVAPCD significance thresholds and consequently would result in less than significant Project related regional air quality impacts during the operations phase.

In addition, the SJVAPCD’s Guidance for Assessing and Mitigation Air Quality Impacts states that “Thus, projects with emissions below the thresholds of significance for criteria pollutants would be determined to ‘Not conflict or obstruct implementation of the District’s air quality plan’.” As such, the Project would be consistent with the SJVAPCD’s air quality plans that are designed to bring the air basin into attainment with State and federal ambient air quality standards.

Localized emissions of truck activities attributable to the Project would occur as trucks ingress and egress from the Project site as well as from idling emissions. As mentioned previously, there would be an anticipated total of up to 10 truck trips per day. The primary onsite travel path is located approximately 200 feet from the nearest adjacent residential use to the east of the Project site. The

center of the truck parking area is approximately 140 feet north of the property line (365 feet from the residential building) of the same residential use. As such, dispersion of the transient air pollutant emissions from these trips would occur from the separation distance between these emission sources and property line. These emissions would last for a couple of minutes during onsite travel. Idling emissions are limited by the California Air Resources Board’s (CARB) Airborne Toxic Control Measure is set forth in title 13, CCR, section 2485, and requires, among other things, that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle’s primary diesel engine longer than five minutes at any location. Lastly, an assessment of potential health risk was assessed based on the prioritization score using SJVAPCD’s prioritization tool (SJVAPCD 2020) indicates that the Project would not have excessive levels of human health risk. As such, onsite idling emissions and travel emissions are not substantial and would result in less than significant impacts to local air quality proximate to the Project site.

**PROJECTED IMPACT: Less Than Significant**

<b>Table 5: Operational Emissions Summary and Annual Significance Thresholds</b>			
<b>Criteria Pollutants</b>	<b>Project Emissions</b>	<b>Threshold</b>	<b>Significance</b>
	<b>tons/yr</b>	<b>tons/yr</b>	
ROG (VOC)	<1	10	LTS
NO <sub>x</sub>	<1	10	LTS
CO	<1	100	LTS
SO <sub>x</sub>	<1	27	LTS
Total PM <sub>10</sub>	<1	15	LTS
Total PM <sub>2.5</sub>	<1	15	LTS

Sources: Applicant 2023, SJVAPCD 2015a,b,c; CalEEMod  
 Total PM<sub>10</sub> / PM<sub>2.5</sub> comprises fugitive dust plus engine exhaust

<b>Table 6: Operational Emissions Summary and Daily Significance Thresholds</b>			
<b>Criteria Pollutants</b>	<b>Project Emissions</b>	<b>Threshold</b>	<b>Significance</b>
	<b>lbs/day</b>	<b>lbs/day</b>	
ROG (VOC)	<1	100	LTS
NO <sub>x</sub>	3	100	LTS
CO	<1	100	LTS
SO <sub>x</sub>	<1	100	LTS
Total PM <sub>10</sub>	1	100	LTS
Total PM <sub>2.5</sub>	<1	100	LTS

Sources: Applicant 2023, SJVAPCD 2015a,b,c; CalEEMod  
Notes:  
 Tons/yr includes winter or summer maxima for planned land use  
 Total PM<sub>10</sub> / PM<sub>2.5</sub> comprises fugitive dust plus engine exhaust  
 LTS - Less Than Significant

## GREENHOUSE GAS IMPACTS ANALYSES

The construction and operational related GHG emissions were calculated by CalEEMod using the methodology detailed above in the Air Quality Section.

Greenhouse Gas Emissions from Construction and Operation Greenhouse gases – primarily carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous (N<sub>2</sub>O) oxide, collectively reported as carbon dioxide equivalents (CO<sub>2</sub>e) – are directly emitted from stationary source combustion of natural gas in equipment such as water heaters, boilers, process heaters, and furnaces. GHGs are also emitted from mobile sources such as on-road vehicles and off-road construction equipment burning fuels such as gasoline, diesel, biodiesel, propane, or natural gas (compressed or liquefied). Indirect GHG emissions result from electric power generated elsewhere (i.e., power plants) used to operate process equipment, lighting, and utilities at a facility. Also, included in GHG quantification is electric power used to pump the water supply (e.g., aqueducts, wells, pipelines) and disposal and decomposition of municipal waste in landfills. (CARB 2022a).

California’s Building Energy Efficiency Standards are updated on an approximately three-year cycle. The 2022 standards improved upon the 2019 standards for new construction of, and additions and alterations to, residential, commercial, and industrial buildings. The 2022 standards went into effect on January 1, 2023 (CEC 2022).

Since the Title 24 standards require energy conservation features in new construction (e.g., high-efficiency lighting, high-efficiency heating, ventilating, and air-conditioning (HVAC) systems, thermal insulation, double-glazed windows, water conserving plumbing fixtures, etc.), they indirectly regulate and reduce GHG emissions.

Using CalEEMod, direct on-site and off-site GHG emissions were estimated for construction and operation, and indirect off-site GHG emissions were estimated to account for truck related emissions.

### ***Results of Greenhouse Gas Emissions Analysis***

Table 7 shows unmitigated and mitigated GHG emissions. For context, these estimated emissions are relatively small, approximately 394 MT CO<sub>2</sub>e per year, which is about 0.007% of the statewide commercial sector GHG inventory of approximately 22 million MT CO<sub>2</sub>e per year (CARB 2022b).

As project design features, the Truck Parking Project would implement applicable and feasible GHG reduction measures provided in the December 17, 2009, *Final Staff Report, Appendix J: GHG Emission Reduction Measures – Development Projects*. The Project proponent (Applicant) would implement the following measures as applicable and feasible for the type of land use: A11 Vehicle Idling (5-minute BMP idling limit). (SJVAPCD 2009a)

Table 5: Greenhouse Gas Emissions Summary and Significance Evaluation			
Greenhouse Gases	Project Emissions	Threshold	Significance
	MT/yr	MT/yr	
Carbon dioxide (CO <sub>2</sub> )	375	—	—
Methane (CH <sub>4</sub> )	<1	—	—
Nitrous Oxide (N <sub>2</sub> O)	<1	—	—
Refrigerants (R)	<1	—	—
Carbon Dioxide Equivalents (CO <sub>2</sub> e)	394	Feasible BPS <sup>1</sup>	LTS <sup>1</sup>

Sources: Applicant 2023, SJVAPCD 2009a,b; CalEEMod version 2022.1.1.24

**Notes:**

Comprises annual operational emissions plus construction emissions amortized over 30 years

<sup>1</sup> LTS - Less Than Significant, with implementation of applicable feasible BPS (see Discussion).

**Discussion**

The SJVAPCD adopted guidance in its December 17, 2009, *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for new Projects under CEQA* for determining GHG emission significance. The guidance provides that a land use project can implement Best Performance Standards (BPS) for the type of land use or reduce project-related GHG emissions by 29% compared to Business-as-Usual (BAU) to show that a project’s GHG impacts would be less than significant (SJVAPCD 2009b). However, as discussed below, the BAU approach for determining significance is not applicable to the Truck Parking Project.

*Newhall Ranch Case*

The Newhall Ranch case shows how a BAU comparison is not a sufficient means of determining GHG significance in the absence of specific numerical thresholds set by a local agency.

The California Supreme Court’s CEQA decision on the Newhall Ranch development case, *Center for Biological Diversity v. California Department of Fish and Wildlife (November 30, 2015, Case No. 217763)*, determined that the project’s Environmental Impact Report (EIR) did not substantiate the conclusion that the GHG cumulative impacts would be less than significant. The EIR determined that the Newhall Ranch development project would reduce GHG emissions by 31% from BAU. This reduction was compared to California’s target of reducing GHG emissions statewide by 29% from BAU. The Court determined that “the EIR’s deficiency stems from taking a quantitative comparison method developed by the Scoping Plan as a measure of the greenhouse gas reduction effort required by the state as a whole, and attempting to use that method, without adjustments, for a purpose very different from its original design.” In the Court’s final ruling it offered suggestions that were deemed appropriate use of the BAU methodology:

- 1) Lead agencies can use the comparison to BAU methodology if they determine what reduction a particular project must achieve to comply with statewide goals;
- 2) Project design features that comply with regulations to reduce emissions may demonstrate that those components of emissions are less than significant; and
- 3) Lead agencies could also demonstrate compliance with locally adopted climate plans or could apply specific numerical thresholds developed by some local agencies.

Stanislaus County, the Lead CEQA agency for this Project, has not developed specific thresholds for GHGs. The SJVAPCD, a CEQA Trustee [Responsible] Agency for this Project, has developed thresholds to determine significance of a proposed Project – either implement BPS or achieve a 29% reduction from BAU (a specific numerical threshold). However, the SJVAPCD (2009b) has established their BAU and baseline emissions based on the years 2002-2004 and 2020, respectively. The 2020 projected baseline has passed, and at this time, no new guidance has been approved for determining BAU and projected baseline for the next target year. Therefore, the 29% reduction from BAU cannot be applied to the proposed Project to determine significance. Additionally, a BPS threshold has not been established.

Therefore, the GHG analysis for the Truck Parking Project follows the suggestions from the Court’s ruling on the Newhall Ranch development project to determine significance using the project design features. There is no practicable method for determining whether a BAU emissions baseline can be defined for this type of facility. In context, the proposed Project is not a planned residential community, commercial retail center or office building, or a permitted stationary source, where applicable BPS can be designed-into a project and maintained under ownership control. A project versus baseline assessment is not practicable for this type of facility. This situation is consistent with Newhall Ranch.

Though the SJVAPCD’s approach to BAU is no longer applicable, the magnitude of Project GHG emissions is not large. To provide reference, the South Coast Air Quality Management District has adopted a GHG threshold of 10,000 MTCO<sub>2e</sub> for industrial projects. The Placer County Air Pollution Control District has adopted a bright-line threshold of also 10,000 MTCO<sub>2e</sub>. This same GHG threshold has also Monterey Bay Unified Air Pollution Control District. In addition, the GHG emissions associated with the Project are currently occurring at the existing site and the operation and emissions of these trucks will not change substantially from the current site to the proposed Project site. As such, the Project would not result in a substantial increase in GHG emissions and would result in a less than significant impact to emissions of GHGs.

### ***Conclusions***

CEQA requires that all feasible and reasonable mitigation be applied to the Project to reduce significant impacts from construction and operations on air quality. These measures include using CARB-mandated controls that limit the exhaust from construction equipment and using alternatives to diesel when possible. Additional reductions would be achieved through the regulatory process of the air district and CARB as required changes to diesel engines are implemented, which would affect trucks, and limits on idling. Due to the small magnitude of GHG emissions, the Project individually would not have a significant impact on global warming or climate change. The Project would not contribute to significantly to related health effects.

PROJECTED IMPACT: Less Than Significant

## INDIRECT SOURCE REVIEW

The SJVAPCD Rule 9510 Indirect Source Review (ISR) encourages developers to incorporate clean air measures and reduce emissions of NO<sub>x</sub> and PM<sub>10</sub> from new development projects. Large development projects, including commercial space greater than 10,000 square feet, are subject to the ISR requirements including the submittal of an Air Impact Assessment (AIA) and the implementation of on-site and/or off-site emissions reduction mitigation measures. For construction emissions, Rule 9510 requires a 20% reduction of the total NO<sub>x</sub> emissions and a 45% reduction of the total PM<sub>10</sub> exhaust emissions compared to the statewide average emissions. Additionally, a 33.3% reduction of the project’s operational baseline NO<sub>x</sub> emissions and a 50% reduction of the project’s operational baseline PM<sub>10</sub> emissions over a period of ten years. These reductions can be achieved through on-site mitigation measures or off-site emission reduction fees.

### Rule 9510 Project Emissions

As part of the AIA, the construction and operation NO<sub>x</sub> and PM<sub>10</sub> emissions were quantified using CalEEMod and the assumptions listed above. The operation emissions were determined for the first ten years for the Project operation. Per Rule 9510 §3.11, construction emissions consist of NO<sub>x</sub> and exhaust PM<sub>10</sub> emissions resulting from the use of internal combustion engines related to construction activity. Per Rule 9510 §3.29, operational emissions are the combination of area and mobile emissions associated with a facility. Table 6 summarizes the NO<sub>x</sub> and PM<sub>10</sub> emissions used to determine the required Rule 9510 emission reductions.

Description	Year	Start Date	ISR Phase	NO <sub>x</sub> Unmitigated (tons/year)	NO <sub>x</sub> Mitigated (tons/year)	PM <sub>10</sub> Unmitigated (tons/year)	PM <sub>10</sub> Mitigated (tons/year)
Construction	2025	1/1/2025	1	0.011	0.011	0.0002	0.0002
Operations	10-yr Average	1/1/2026	2	0.47	0.47	0.11	0.11
<b>Total</b>				<b>0.5</b>	<b>0.5</b>	<b>0.1</b>	<b>0.1</b>

Notes:

Construction emissions for ISR fees are based on total NO<sub>x</sub> emissions and PM<sub>10</sub> exhaust emissions.

Operations emissions are the sum of area and mobile emissions. The average of the emissions over the first 10 years of operation were used to determine the ISR fees.

### Rule 9510 Fee Estimates

An off-site emission reduction fee is required for the portion of required emission reductions that are not reduced on-site. Rule 9510 Section 4.0 Exemptions Rule 4.3 states that “Development projects that have a mitigated baseline below two (2.0) tons per year of NO<sub>x</sub> and two (2.0) tons per year of PM<sub>10</sub> shall be exempt from the requirements in sections 6.0 and 7.0.” Based on the construction and operational emission estimates in Table 6, the project is exempt from Sections 6 and 7 of Rule 9510 and would not result in the need for mitigation and off-site emission reduction fees. However, a separate ISR AIA Application Filing Fee of \$841 for mixed use / non-residential / transportation / transit projects is due upon filing.

## HEALTH RISK SCREENING

### Health Risk Screening Methodology

The main toxic air contaminant (TAC) from off-road construction equipment and on-road heavy-duty trucks is diesel particulate matter (DPM, as diesel exhaust PM<sub>10</sub>). DPM has a high toxicity factor, and thus dominates predicted health risks. Therefore, it was the only TAC that was assessed for this project. CalEEMod was used to generate the exhaust PM<sub>10</sub> emissions from both Project construction and operations. All substantial sources of TACs during the operation phase for this project are from on-road trucks. The majority of project emissions occur offsite over a large area where local effects will not effect the project area. Therefore, to evaluate local effects on the area immediately surrounding the project, a ratio of local trip length over total trip length was applied to total PM<sub>10</sub> exhaust emissions calculated using CalEEMod to obtain local emissions occurring proximate to the project site. One mile per trip was conservatively used to quantify the local emissions.

Per information provided by the applicant, there will be an average of five trips per day at an average length per one way trip of 130 miles. Total annual VMT was calculated to be 237,012 miles for 1,823 total annual trips. Thus, the 1-mile localized mobile source exhaust emissions are characterized as 1/130 of the total operational mobile source exhaust emissions, i.e., 0.8% of 15.01 pounds per year (lbs/year) of exhaust PM<sub>10</sub> is 0.12 lbs/year of localized emissions for the operations phase of the project. Construction exhaust PM<sub>10</sub> (DPM) emissions total 0.49 lbs/year. Amortized over a 30-year project life, annual average DPM is 0.02 lbs/year from construction. Thus, total localized DPM emissions from the construction and operations phases are 0.14 lbs/year in the vicinity of the project site.

The closest residential receptor is a single family home roughly 40 meters south of the project site. The site is bordered by the Highway 99 to the north and agricultural land with scattered single family homes on all other sides.



<b>Table 7: Diesel Particulate Matter Emissions Summary</b>			
<b>Description</b>	<b>Exhaust PM<sub>10</sub> Emissions (lbs/year)</b>	<b>Percent Local</b>	<b>Local DPM Emissions (lbs/year)</b>
Localized Operations	15.01	0.77%	0.12
Amortized Construction	--	--	0.02
<b>Total Localized Annual DPM</b>			<b>0.14</b>

Notes:

Toxic Air Contaminant thresholds of significance are based on the operations of both permitted and non-permitted sources.

Operations emissions used mobile source exhaust emissions. It was assumed 100% of the total fleet exhaust PM emissions were from diesel based on EMFAC fleet emissions from SJVAPCD.

Construction emissions amortized over 30-year project life

Localized emissions are within 1-mile radius of the project site

Consistent with SJVAPCD guidelines, the scoring procedure was conducted using the District’s December 2022 *Prioritization Calculator*, which follows CAPCOA’s August 2016 *Air Toxic “Hot Spots” Program Facility Prioritization Guidelines*. The  $0 < R < 100$  proximity factor was used as the closest receptor is less than 100 meters from the project site. The results of the health risk screening are provided in Table 8.

<b>Table 8: Health Risk Screening Summary DPM</b>			
<b>Risk Score</b>	<b>Prioritization Score</b>	<b>Threshold</b>	<b>Significance</b>
Cancer Score	0.32	10	LTS
Chronic Score	0.001	1	LTS
Acute Score	0.000	1	LTS

Notes:

Localized emissions are within 1-mile radius of the project site

Receptor distance  $0 \leq R < 100$  meters; proximity factor = 1.0

LTS - Less Than Significant

**PROJECTED IMPACT:** Less Than Significant

## CONCLUSION

The air quality and GHG impacts of the proposed Truck Parking project were evaluated and shown to have a less than significant impact. The Rule 9510 evaluation determined that there will be an \$841 administrative fee and the project is exempt from the NO<sub>x</sub> and PM<sub>10</sub> emission fees per the Rule 9510 Section 4.3 exemption.

## CLOSING

Thank you very much for the opportunity to be of assistance to Truck Parking Project. Should you have any questions, please contact me at (949) 979-1372 (mobile) or (949) 979-1372 (office).

Sincerely,



Tin Cheung

Principal Scientist  
Yorke Engineering, LLC  
[Tcheung@YorkeEngr.com](mailto:Tcheung@YorkeEngr.com)

cc: Will Duvall, Yorke Engineering, LLC  
Bradford Boyes, Yorke Engineering, LLC

### Enclosures/Attachments:

1. CalEEMod Outputs
2. Rule 9510 Forms
3. Prioritization Calculator

## AIR QUALITY AND GHG REFERENCES

California Air Resources Board (CARB). 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality. Website (<https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>) accessed November 15, 2023.

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San Joaquin Valley Air Pollution Control District (SJVAPCD). 2009b. Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for new Projects under CEQA. Website (<http://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf>) accessed November 15, 2023.

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## ATTACHMENT 1 – CALEEMOD OUTPUTS

# Turlock Truck Parking Detailed Report

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Turlock Truck Parking
Construction Start Date	9/1/2024
Operational Year	2024
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.10
Precipitation (days)	29.0
Location	1005 E Greenway Ave, Turlock, CA 95380, USA
County	Stanislaus
City	Unincorporated
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2216
EDFZ	14
Electric Utility	Turlock Irrigation District
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.25

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## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Other Non-Asphalt Surfaces	1.50	Acre	1.50	0.00	0.00	—	—	—
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### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.27	0.19	4.22	2.78	0.02	0.10	0.65	0.75	0.09	0.18	0.27	—	2,737	2,737	0.07	0.39	5.92	2,860
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	0.06	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.5	37.5	< 0.005	0.01	0.03	39.1
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.20	6.20	< 0.005	< 0.005	0.01	6.48

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### 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.27	0.19	4.22	2.78	0.02	0.10	0.65	0.75	0.09	0.18	0.27	—	2,737	2,737	0.07	0.39	5.92	2,860

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	< 0.005	0.06	0.04	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	37.5	37.5	< 0.005	0.01	0.03	39.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.20	6.20	< 0.005	< 0.005	0.01	6.48

## 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

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Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.04	2.45	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	0.00	2,266	2,266	0.04	0.36	5.56	2,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.04	2.61	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	0.00	2,267	2,267	0.04	0.36	0.14	2,374
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.08	0.04	2.57	0.38	0.02	0.04	0.58	0.62	0.04	0.16	0.20	0.00	2,266	2,266	0.04	0.36	2.40	2,377
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.01	0.47	0.07	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	0.00	375	375	0.01	0.06	0.40	393

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Turlock Truck Parking Detailed Report, 6/26/2024

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Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.03	2.45	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,266	2,266	0.04	0.36	5.56	2,380
Area	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.08	0.04	2.45	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	0.00	2,266	2,266	0.04	0.36	5.56	2,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.03	2.61	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,267	2,267	0.04	0.36	0.14	2,374
Area	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.08	0.04	2.61	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	0.00	2,267	2,267	0.04	0.36	0.14	2,374
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.07	0.03	2.57	0.38	0.02	0.04	0.58	0.62	0.04	0.16	0.20	—	2,266	2,266	0.04	0.36	2.40	2,377
Area	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.08	0.04	2.57	0.38	0.02	0.04	0.58	0.62	0.04	0.16	0.20	0.00	2,266	2,266	0.04	0.36	2.40	2,377
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01	< 0.005	0.47	0.07	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	—	375	375	0.01	0.06	0.40	393

Area	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.47	0.07	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	0.00	375	375	0.01	0.06	0.40	393

### 3. Construction Emissions Details

#### 3.1. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

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Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.12	1.20	1.92	< 0.005	0.05	—	0.05	0.05	—	0.05	—	290	290	0.01	< 0.005	—	291
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.98	3.98	< 0.005	< 0.005	—	3.99
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

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Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.66	0.66	< 0.005	< 0.005	—	0.66
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	20.9	20.9	< 0.005	< 0.005	0.09	21.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.11	0.06	3.01	0.72	0.02	0.04	0.63	0.68	0.04	0.17	0.22	—	2,425	2,425	0.05	0.38	5.83	2,547
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.26	0.26	< 0.005	< 0.005	< 0.005	0.27
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.04	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	33.2	33.2	< 0.005	0.01	0.03	34.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.04	0.04	< 0.005	< 0.005	< 0.005	0.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.50	5.50	< 0.005	< 0.005	0.01	5.77

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use



4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.07	0.03	2.45	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,266	2,266	0.04	0.36	5.56	2,380
Total	0.07	0.03	2.45	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,266	2,266	0.04	0.36	5.56	2,380
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.07	0.03	2.61	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,267	2,267	0.04	0.36	0.14	2,374
Total	0.07	0.03	2.61	0.38	0.02	0.04	0.59	0.63	0.04	0.16	0.20	—	2,267	2,267	0.04	0.36	0.14	2,374
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.01	< 0.005	0.47	0.07	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	—	375	375	0.01	0.06	0.40	393
Total	0.01	< 0.005	0.47	0.07	< 0.005	0.01	0.11	0.11	0.01	0.03	0.04	—	375	375	0.01	0.06	0.40	393

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4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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06

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

19

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.01	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

26

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

99

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Other Non-Asphalt Surfaces	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

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Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)



Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

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Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 5. Activity Data

#### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Paving	Paving	8/17/2024	8/23/2024	5.00	5.00	—

#### 5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Paving	—	—	—	—
Paving	Worker	2.50	10.8	LDA,LDT1,LDT2
Paving	Vendor	—	7.17	HHDT,MHDT
Paving	Hauling	34.0	20.0	HHDT
Paving	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)

Paving	0.00	0.00	0.00	0.00	1.50
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5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Other Non-Asphalt Surfaces	1.50	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	609	0.24	0.34

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Other Non-Asphalt Surfaces	5.00	5.00	5.00	1,823	649	649	649	237,013

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

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5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	0.00	0.00	3,920

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	0.00

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Other Non-Asphalt Surfaces	0.00	546	0.2127	0.3038	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Other Non-Asphalt Surfaces	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
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Other Non-Asphalt Surfaces	0.00	—
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5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
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5.18. Vegetation

5.18.1. Land Use Change

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5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 6. Climate Risk Detailed Report

### 6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	24.7	annual days of extreme heat
Extreme Precipitation	2.00	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events.

Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

## 6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	0	0	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

## 6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	2	1	1	3
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	1	1	1	2
Drought	1	1	1	2



Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	74.1
AQ-PM	85.4
AQ-DPM	61.3
Drinking Water	96.6
Lead Risk Housing	56.4
Pesticides	97.7
Toxic Releases	23.4
Traffic	58.8
Effect Indicators	—
CleanUp Sites	73.4
Groundwater	94.8
Haz Waste Facilities/Generators	81.5
Impaired Water Bodies	58.7

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Solid Waste	95.7
Sensitive Population	—
Asthma	83.8
Cardio-vascular	97.2
Low Birth Weights	66.8
Socioeconomic Factor Indicators	—
Education	77.2
Housing	62.8
Linguistic	84.0
Poverty	87.1
Unemployment	89.5

### 7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	33.19645836
Employed	19.97946875
Median HI	32.49069678
Education	—
Bachelor's or higher	15.68073912
High school enrollment	22.50737842
Preschool enrollment	12.83202874
Transportation	—
Auto Access	70.20402926
Active commuting	19.47901963
Social	—

2-parent households	65.7128192
Voting	32.47786475
Neighborhood	—
Alcohol availability	74.96471192
Park access	4.747850635
Retail density	11.89529065
Supermarket access	41.93506993
Tree canopy	37.71333248
Housing	—
Homeownership	51.52059541
Housing habitability	47.33735404
Low-inc homeowner severe housing cost burden	72.65494675
Low-inc renter severe housing cost burden	23.67509303
Uncrowded housing	35.72436802
Health Outcomes	—
Insured adults	15.88605158
Arthritis	70.7
Asthma ER Admissions	13.5
High Blood Pressure	81.9
Cancer (excluding skin)	77.2
Asthma	37.3
Coronary Heart Disease	69.4
Chronic Obstructive Pulmonary Disease	47.8
Diagnosed Diabetes	54.0
Life Expectancy at Birth	45.2
Cognitively Disabled	21.0
Physically Disabled	21.7

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Heart Attack ER Admissions	3.2
Mental Health Not Good	31.0
Chronic Kidney Disease	64.9
Obesity	22.5
Pedestrian Injuries	72.2
Physical Health Not Good	38.5
Stroke	70.4
Health Risk Behaviors	—
Binge Drinking	19.3
Current Smoker	29.7
No Leisure Time for Physical Activity	34.5
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	24.2
Elderly	60.7
English Speaking	41.2
Foreign-born	72.3
Outdoor Workers	9.8
Climate Change Adaptive Capacity	—
Impervious Surface Cover	86.9
Traffic Density	57.2
Traffic Access	0.0
Other Indices	—
Hardship	72.9
Other Decision Support	—
2016 Voting	43.5

### 7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	100
Healthy Places Index Score for Project Location (b)	22.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

### 7.4. Health & Equity Measures

No Health & Equity Measures selected.

### 7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

### 7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

## 8. User Changes to Default Data

Screen	Justification
Characteristics: Project Details	Project specific information
Construction: Construction Phases	Modified for a parking lot
Operations: Fleet Mix	Only trucks
Operations: Landscape Equipment	No additional landscaping included.
Construction: Off-Road Equipment	Only a single tractor needed
Operations: Vehicle Data	Based on 5 ingress/egress trips per day
Construction: Trips and VMT	50 truck loads/day

---

**ATTACHMENT 2 – RULE 9510 FORM AND CALCULATUION**

## Indirect Source Review (ISR) - Air Impact Assessment (AIA) Application

A. Applicant Information			
Applicant/Business Name: Lucky Star Logistics			
Mailing Address: 1005 East Greenway Avenue	City: Turlock	State: CA	Zip: 95380
Contact: Raj Bhullar	Title: Mr.		
Is the Applicant a licensed state contractor? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, please provide State License number:			
Phone: (209) 445-4431	Email: Bhullar0135@Gmail.com		

B. Agent Information (if applicable)			
Agent/Business Name:			
Mailing Address:	City:	State:	Zip:
Contact:	Title:		
Phone:	Email:		

C. Project Information			
Project Name: Lucky Star Trucks			
Project Location	Street: 1005 East Greenway Avenue	City: Turlock	Zip: 95380
Cross Streets:		County: Stanislaus	
Permitting Agency: Stanislaus County	Planner: <b>Kristy Doud</b>	Contact Number: (209) 525-6330	
Permit Type and Number (if known):			
Subject to Project-Level Discretionary Approval? <input type="checkbox"/> Yes <input type="checkbox"/> No		Last Project-Level Discretionary Approval Date: N/A	
		Last Project-Level Ministerial Approval Date: N/A	

D. Project Description			
Please briefly describe the project (e.g.: 300 multi-family residential units apartments or 6 miles road widening): 12 space truck parking lot on agricultural land.			
For <b>Residential/Non-Residential/Mixed-Use</b> please check the box next to each applicable land use below:			
<input checked="" type="checkbox"/> Commercial / Retail	<input type="checkbox"/> Educational	<input type="checkbox"/> Office	<input type="checkbox"/> Warehouse
<input type="checkbox"/> Residential	<input type="checkbox"/> Government	<input type="checkbox"/> Industrial	<input type="checkbox"/> Distribution Center
<input type="checkbox"/> Recreational (e.g. park)	<input type="checkbox"/> Medical	<input type="checkbox"/> Manufacturing	<input checked="" type="checkbox"/> Other: <b>Parking Facility</b>
For <b>Transportation/Transit</b> please check the box next to each applicable land use below:			
<input type="checkbox"/> New Road Construction	<input type="checkbox"/> Expansion to an Existing Road	<input type="checkbox"/> Bridge / Overpass	<input type="checkbox"/> Interchange or Intersection Improvements
Select land use setting: <input type="checkbox"/> Urban <input checked="" type="checkbox"/> Rural			

E. Notice of Violation	
Is this application being submitted as a result of receiving a Notice of Violation (NOV)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes, NOV #:	

FOR DISTRICT USE ONLY			
Filing Fee	Check	Date Stamp: Finance	Date Stamp: Permit
Received: _____	#: _____		
Date Paid: _____	Project		
Applicant #: _____	#: _____		

**F. Voluntary Emission Reduction Agreement (VERA)**

Is this project part of a larger project for which there is a VERA with the District?  No  Yes, VERA #:

**G. Optional Section**

Do you want to receive information about the Healthy Air Living Business Partners Program?  No  Yes

**H. Parcel and Land Owner Information**

	APN (000-000-00 Format)	Gross Acres	Land Owner
1.	044-028-011	10	
2.			
3.			

Additional sheets for listing APN numbers can be found on the District’s website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

**I. Project Development and Operation**

Will the project require demolition of existing structures?  Yes, complete J  No, complete K

**J. Demolition**

Total square feet of building(s) footprint to be demolished: \_\_\_\_\_ Number of Building Stories: \_\_\_\_\_  
 Demolition Start Date (Month/Year): \_\_\_\_\_ Number of Days for Demolition: \_\_\_\_\_

**K. Timing**

Expected number of work days per week during construction?  5 days  6 days  7 days  
 For **Transportation/Transit** projects, please complete L-1  
 For **Residential/Non-Residential/Mixed-Use** projects, will it be developed in multiple phases?  No, complete L-2  Yes, complete L-3

**L-1. Transportation / Transit Development and Timing Details**

Please note that development timelines provided within this section should reflect actual work time, and should not account for possible project delays.

Start of Construction (Month/Year): \_\_\_\_\_ End of Construction (Month/Year): \_\_\_\_\_  
 Number of actual construction days: \_\_\_\_\_  
 Length of road being constructed: \_\_\_\_\_ miles Width of road being constructed: \_\_\_\_\_ feet  
 Predominant Soil Type (choose one):  Sand Gravel  Weathered Rock – Earth  Blasted Rock  
 Amount of soil imported: \_\_\_\_\_ cubic yards Amount of soil exported: \_\_\_\_\_ cubic yards  
 Amount of asphalt imported: \_\_\_\_\_ cubic yards Amount of asphalt exported: \_\_\_\_\_ cubic yards  
 Total area to be disturbed: \_\_\_\_\_ acres Maximum area disturbed per day: \_\_\_\_\_ acres  
 Average truck capacity: \_\_\_\_\_ cubic yards Will water trucks be used?  Yes  No

**L-2. Single Phase Development**

Start of Construction (Month/Year): 8/17/2024 Gross Acres: 1.5  
 End of Construction (Month/Year): 8/23/2024 Net Acres (area devoted to buildings/structures): 0  
 First Date of Occupation (Month/Year): 8/23/2025 Paved Parking Area (# of Spaces): **12 Truck and 24 Trailer on gravelled area.**  
 Building Square Footage:0 Number of Dwelling Units: 1 existing

**L-3. Phased Site Development and Building Construction**

In addition to the information below you can submit phase specific activity timeline found on District’s website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

1	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
2	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):



		Number of Dwelling Units:
3	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:
4	Start of Construction (Month/Year):	Gross Acres:
	End of Construction (Month/Year):	Net Acres (area devoted to buildings/structures):
	First Date of Occupation (Month/Year):	Paved Parking Area (# of Spaces):
	Building Square Footage:	Number of Dwelling Units:

**Additional sheets for phasing information can be found on the District's website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).**

**M. On-Site Emission Reduction Measures (Mitigation Measures)**

Listed below are categories of possible mitigation measures for applicants to implement that will reduce a project's impact on air quality. Check "Yes" next to any measure that will be utilized for this project, and please complete the corresponding page in this form to identify specifics related to that measure. If a category is not applicable to the project, check "No" and provide justification for not selecting the measure. Also, the applicant is encouraged to provide any mitigation measures including supporting documentation that are not listed on this application form for District consideration. For reference, see [www.valleyair.org/ISR](http://www.valleyair.org/ISR) for potential additional mitigation measures.

**Clean Construction Fleet Mitigation Measure below can be selected for all development types**

1. Clean Construction Fleet (Note: Making a commitment to using less polluting construction equipment)
- Yes, please complete mitigation measure 1 below
- No, please provide justification why not selected: Minimal construction equipment used for gravelling project area.

**Operational Mitigation Measure below can be selected for all development types, except for transportation and transit projects**

2. Clean On-Road Trucks (e.g. Heavy Duty Trucks, Medium Duty Trucks, and Light Duty Trucks)
- Note: Operational fleet will use zero and/or near-zero emissions for all or part of its activities.
- Yes, please complete applicable mitigation measure 2a through 2c below
- No, please provide justification why not selected: Parking area to accommodate relocation of existing truck fleet operations from Ceres.

3. On-Site Zero Emission Off-Road Vehicles and Equipment (e.g. electric forklifts and electric yard trucks)
- Yes, please complete applicable mitigation measure 3 below
- No, please provide justification why not selected: No offroad vehicles anticipated.

4. Solar Panels (e.g. incorporate solar panels in the project)
- Yes, please complete applicable mitigation measure 4 below
- No, please provide justification why not selected: No additional energy use associated with truck parking.

5. Electric Vehicle (EV) Chargers (e.g. incorporate onsite EV charging infrastructure)
- Yes, please complete applicable mitigation measure 5 below
- No, please provide justification why not selected: No electric trucks are currently in use.

6. Clean Lawn and Garden Equipment (e.g. electric mowers, electric leaf blowers, electric trimmers, etc.)
- Yes, please complete applicable mitigation measure 6 below
- No, please provide justification why not selected: This site will have minimal landscaped area.

7. Land Use/Location (e.g. increased density, improve walkability design, increase transit, etc.)
- Yes, please complete applicable mitigation measures 7a through 7f below
- No, please provide justification why not selected: Project site is in a rural area that does not support these facilities.

8. Neighborhood/Site Enhancements (e.g. improve pedestrian network, traffic calming measures, NEV network, etc.)
- Yes, please complete applicable mitigation measures 8a through 8c below
- No, please provide justification why not selected: Project site is in a rural area that does not support these facilities.

9. Parking Policy/Pricing (e.g. parking cost, on-street market pricing, limit parking supply, etc.)
- Yes, please complete applicable mitigation measure 9a through 9e below
- No, please provide justification why not selected: This project is located in a rural area with limited alternatives to driving.

10. Commute Trip Reduction Programs (e.g. workplace parking charge, employee vanpool/shuttle, ride sharing program, etc.)
- Yes, please complete applicable mitigation measures 10a through 10f below
- No, please provide justification why not selected: This project is located in a rural area which makes alternatives to free parking difficult and employee shifts may be flexible, which makes ride sharing difficult.

11. Hearth (e.g. woodstoves or fireplaces)

Yes, please complete mitigation measure 11 below

No, please provide justification why not selected: This project will not include any hearths.

12. Exceed Title 24 (e.g. exceed California Title 24 required energy efficiency for building(s) associated with the project)

Yes, please complete applicable mitigation measures 12 below

### N. Review Period

You may request a five (5) day period to review a draft of the District’s analysis of your project before it is finalized. However, if you

### O. Fee Deferral Schedule

If the project’s on-site air pollution reductions (mitigation measure) insufficiently reduced air pollution as outlined in Rule 9510, an off-site fee is assessed based on the excess air pollution. The money collected from this fee will be used by the District to reduce air

An Applicant may request a deferral of all or part of the ‘off-site’ fees up to, but not to exceed, the start date of construction. The start of construction is any of the following, whichever occurs first: start of grading, start of demolition, or any other site development

I request a Fee Deferral Schedule, and have enclosed the Fee Deferral Schedule Application.

The Fee Deferral Schedule Application, can be found on the District’s website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

### P. Change of Project Developer

The Applicant assumes all responsibility for ISR compliance for this project. If the project developer changes, the Applicant must notify the Buyer, and both Buyer and Applicant must file a ‘Change of Project Developer’ form with the District. If there is a change of project developer, and a ‘Change of Project Developer’ form is not filed with the District, the Applicant will remain liable for ISR compliance.

The Change of Project Developer form can be found on the District’s website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

### Q. Attachments

**Required:**

Tract Map or Project Design Map

Vicinity Map

Application Filing Fee  
\$841.00 for mixed use / non-residential / transportation / transit projects

**OR**

\$562.00 for residential projects only

**If applicable:**

Letter from Applicant granting Agent authorization

Fee Deferral Schedule Application

Monitoring & Reporting Schedule

Supporting documentation for selected Mitigation Measures

### R. Certification Statement

I certify that I have reviewed and completed the entire application and hereby attest that the information relayed within is true and correct to the best of my knowledge. I commit to implementation of those on-site mitigation measures that I have selected above. I am responsible for notifying the District if I will be unable to implement these mitigation measures. If a committed mitigation measure is not implemented, the project may be re-assessed for air quality impacts.

**(An authorized Agent may sign the form in lieu of the Applicant if an authorization letter signed by the Applicant is provided).**

Name (printed): _____	Title: _____
Signature: _____	Date: _____

# Mitigation Measures

## Mitigation Measure 1: Construction Clean Fleet

Will the project use a construction clean fleet to achieve the emission reductions required by District Rule 9510?  
*(By checking "yes" the Applicant is committing to achieving the following emission reduction requirements: 20% for NOx and 45% for PM10 compared to the statewide average.)*

No, please complete justification in Section M above

Yes\*, please be aware of the requirements below:

**\*If yes**, daily records of the total hours of operation for each piece of equipment greater than 50-horsepower being used on the project site during construction must be maintained. Within 30-days of completing construction of each project phase, a report summarizing total hours of operation by equipment type, equipment model year and horsepower for each piece of construction equipment greater than 50-horsepower must be submitted to the District. To assist in this recordkeeping, the *Construction Clean Fleet Data Template* is available on the District's website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

**Please note:** if the required construction emission reductions under Rule 9510 cannot be achieved, fees are required in order to mitigate the remaining balance of emissions. For each project phase, the District will verify that the fleet details achieved the required emission reductions

## Mitigation Measure 2a: Clean On-Road Heavy Duty Trucks

Will the project use any operational clean Heavy Duty Trucks (On-road vehicles with a gross vehicle weight greater than 26,000 pounds)?

For example, zero-emission electric trucks and/or near-zero emission trucks meeting CARB's established emission standard of 0.02 g/bhp-hr NOx.

No, please complete justification in Section M above

Yes\*, please complete section below:

1. Number of trucks for Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

**\*If yes**, by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

**Please note:** by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

## Mitigation Measure 2b: Clean On-Road Medium Duty Vehicles

Will the project use any operational clean Medium Duty Vehicles (On-road vehicles with a gross vehicle weight between 14,001 pounds and 26,000 pounds)?

For example, zero-emission electric vehicles, zero emission last mile delivery trucks or vans and/or near-zero emission vehicles meeting CARB's established emission standard of 0.02 g/bhp-hr NOx.

No, please complete justification in Section M above

Yes\*, please complete section below:

1. Number of trucks for Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

<b>zero emission</b> trucks: _____	<b>near-zero</b> emission trucks: _____	<b>other types</b> of trucks: _____
------------------------------------	---	-------------------------------------

**\*If yes**, by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

**Please note:** by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

### Mitigation Measure 2c: Clean On-Road Light Duty Vehicles

Will the project use any operational clean Light Duty Vehicles (On-road vehicles with a gross vehicle weight below 14,000 pounds)? For example, zero-emission electric vehicles, zero emission last mile delivery trucks or vans and/or near-zero emission vehicles meeting CARBs established emission standard of 0.02 g/bhp-hr NOx.

- No, please complete justification in Section M above  
 Yes\*, please complete section below:

1. Number of trucks for Project:

zero emission trucks: _____	near-zero emission trucks: _____	other types of trucks: _____
-----------------------------	----------------------------------	------------------------------

2. Trip length in miles each of the following types of trucks will travel one way for the Project:

zero emission trucks: _____	near-zero emission trucks: _____	other types of trucks: _____
-----------------------------	----------------------------------	------------------------------

3. Expected number of one-way trips per year for each of the following types of trucks for the Project:

zero emission trucks: _____	near-zero emission trucks: _____	other types of trucks: _____
-----------------------------	----------------------------------	------------------------------

\*If yes, by selecting this measure there will be a condition placed on the monitoring and reporting schedule to ensure compliance. Records of the fleet data, including truck type, will be required to be submitted to the District on an annual basis.

**Please note:** by selecting this measure, you are certifying to the District that the above operational clean fleet vehicles have not been funded by state or District grant programs.

### Mitigation Measure 3: On-Site Zero Emission Off-Road Vehicles and Equipment

Will the project use any operational on-site zero emission Off-Road Vehicles and Equipment? (e.g. electric forklifts, electric yard trucks, electric aerial lifts)

- No, please complete justification in Section M above  
 Yes, please complete section below:

Type of Zero Emission Vehicles and Equipment	No. of Vehicles and Equipment	Hours/Day	Days/Year	Horsepower	Fuel Type (CNG, Hydrogen, or Electric)
1. Yard Truck					
2. Forklifts					
3. Aerial Lifts					
4. Other Equipment					

**Please note:** by selecting this measure, you are certifying to the District that the above operational off-road vehicles have not been funded by state or District grant programs.

Additional sheets for listing On-Site Zero Emission Vehicles/Equipment can be found on the District's website at [www.valleyair.org/ISR](http://www.valleyair.org/ISR).

### Mitigation Measure 4: Solar Panels

Will the project include the installation of solar panels?

- No, please complete justification in Section M above  
 Yes, please complete section below:

- Total power output of solar panels to be installed: \_\_\_\_\_ kW (e.g.: 200 homes x 3kW=600kW.)
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
 Source of Requirement: \_\_\_\_\_

### Mitigation Measure 5: Electric Vehicle (EV) Chargers

Will the project include the installation of electric vehicle (EV) charger(s)?

- No, please complete justification in Section M above  
 Yes, please complete section below:

- Number of charging outlet(s) to be installed (*Note: a charger may have one or more charging outlets*): \_\_\_\_\_
- Charging level (e.g.: Level 1, Level 2, or DC Fast Charge): \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (*note: if checked "no" this mitigation measure will require District enforcement*)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 6: Clean Landscape Equipment

Will the project utilize clean landscaping equipment? (e.g. electric lawn mowers, electric leaf blowers, etc.) (*Note 3% is the assumed statewide average for landscape equipment*)

- No, please complete justification in Section M above  
 Yes, please complete section below:

- Percent of electric lawnmower that will be electrically powered: \_\_\_\_\_
- Percent of leaf blower that will be electrically powered: \_\_\_\_\_
- Percent of electric chainsaw that will be electrically powered: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (*note: if checked "no" this mitigation measure will require District enforcement*)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation if claiming greater than 3% over statewide average.

Attached

### Mitigation Measure 7a: Increase Density

Will the Project be located within 1/2 mile radius of increased density? Density is measured in terms of dwelling units or jobs per acre. A project located in areas of increased density may reduce emissions associated with traffic.

\*Note: There are approximately 502.4 acres in a 1/2 mile radius.

- No, please complete justification in Section M above  
 Yes, please complete section below:

1. Number of Dwelling Units within 1/2 radius of Project:

2. Number of Jobs within 1/2 mile radius of Project:

3. Density:

*Density is the 'Number of Dwelling Units' or 'Number of Jobs' within 1/2 mile radius divided by 502.4 acres.*

**Dwelling Units per Acre:**

**Jobs per Acre:**

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (*note: if checked "no" this mitigation measure will require District enforcement*)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation (e.g.: map) to justify the provided jobs and housing.

Attached

### Mitigation Measure 7b: Increase Diversity

This mitigation measure applies to a project in an *Urban Area only*. Will the project be predominantly characterized by properties on which various uses, such as office, commercial, institutional, and residential are present within ¼ mile? Mixed-use development should encourage walking and other non-auto modes of transport and minimize need for external trips.

- No, please complete justification in Section M above  
 Yes, please complete section below:

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation (e.g.: map) to justify the project is characterized by various uses, such as office, commercial, institutional, and residential are within ¼ mile that encourage walking and non-auto modes of transport.

Attached

### Mitigation Measure 7c: Improve Walkability Design

Will the project improve walkability?

- No, please complete justification in Section M above  
 Yes, please complete section below:

1. Square Miles within the Study Area: a. If the distance from the center of the project out to its farthest boundary is less than or equal to ½ mile then the Square Miles within the Study Area will be 0.79. (Enter this value in the blank to the right.) b. If the distance from the center of the project out to its farthest boundary is greater than ½ mile then calculate the area value by: Study Area Square Miles = 3.14 x radius(squared). (Enter this value in the blank to the right.)	Square Miles:
---	---------------

2. Intersection within the Study Area: Number and type of intersections within the project area:	Number of 3-Way Intersections:		x 3 =	
	Number of 4-Way Intersections:		x 4 =	
	Number of 5-Way Intersections:		x 5 =	
	Total Intersections (sum of above) =			

3. Intersection Density within the Study Area: Intersection Density is the Study Area's 'Total Intersections' value (B.) divided by the 'Square Miles' value (A.):	_____ Intersections / sq. mi.
---	-------------------------------

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation (e.g.: map) to justify number of intersections within ½ mile of the project.

Attached

### Mitigation Measure 7d: Improve Destination Accessibility

Will the project be located within 12 miles from downtown or a job center? The location of the project may increase the potential for pedestrians to walk and bike to these destinations and therefore reduce VMT.

- No, please complete justification in Section M above  
 Yes, please complete section below:

- Distance to Downtown/Job Center (miles): \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation (e.g: map) to justify the distance of the project to the Downtown/Job Center.

Attached

**Mitigation Measure 7e: Increase Transit Accessibility**

Will the project be located near a transit station/stop at least within 1/4 mile or near a rail at least within 1/2 mile that will facilitate the use of transit by people traveling to or from the project site?

- No, please complete justification in Section M above
- Yes, please complete section below:

- Distance to Rail Station (miles):  1/2 mile or less  between 1/2 mile and 3 miles
- Distance to Transit Station (miles):  1/4 mile
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?  
 No, (note: if checked "no" this mitigation measure will require District enforcement)  
 Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation (e.g.: map) to justify the project is located within 1/4 mile of a transit station or within 1/2 mile of a rail from the project site.

Attached

**Mitigation measure 7f: Integrate Below Market Rate Housing**

Will the project require all or a portion of the residential units designated as deed-restricted below-market-rate (BMR) housing?

- No, please complete justification in Section M above
- Yes, please complete section below:

- Percentage of total dwelling units deed-restricted below market rate: \_\_\_\_\_%
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?  
 No, (note: if checked "no" this mitigation measure will require District enforcement)  
 Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach supporting documentation to justify all or a portion of the residential units that are designated as deed-restricted below-market-rate housing.

Attached

**Mitigation Measure 8a: Improve Pedestrian Network**

Will the project provide a pedestrian access network that internally links all uses and connects to all existing or planned external streets and pedestrian facilities contiguous with the project site?

- No, please complete justification in Section M above
- Yes, please complete section below:

- Select one of the following areas, where pedestrian accommodations will be provided:  
 within Project Site  within Project Site and Connecting Off-Site  Project Site is within a Rural setting
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?  
 No, (note: if checked "no" this mitigation measure will require District enforcement)  
 Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Mitigation Measure 8b: Provide Traffic Calming Measures**

Will this project provide traffic calming measures which encourage people to walk or bike instead of using a vehicle (e.g., marked crosswalks, count-down signal timers, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, roundabouts or mini-circles, on-street parking, planter strips with street trees, chicanes/chokers, and others)?

- No, please complete justification in Section M above
- Yes, please complete section below:

- % Streets with Improvement within 1/2 mile of project site:  25%  50%  75%  100%
- % Intersections with Improvement within 1/2 mile of project site:  25%  50%  75%  100%
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?  
 No, (note: if checked "no" this mitigation measure will require District enforcement)  
 Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Mitigation Measure 8c: Implement Neighborhood Electric Vehicle (NEV) Network**

Will the project provide a NEV network including the necessary infrastructure such as parking, charging facilities, striping, signage, and educational tools?

\*Note: NEVs are classified in the California Vehicle Code as a “low speed vehicle”.

- No, please complete justification in Section M above
- Yes, please complete section below:

- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked “no” this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_
  - Source of Requirement: \_\_\_\_\_

**Mitigation Measure 9a: Limit Parking Supply**

Will the project provide fewer parking spaces than the rate provided by the Institute of Transportation and Engineering (ITE) Parking Generation Handbook?

- No, please complete justification in Section M above
- Yes, please complete section below:

- % Reduction in Spaces: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked “no” this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_
  - Source of Requirement: \_\_\_\_\_

**Mitigation Measure 9b: Unbundle Parking Cost**

Will the project implement a monthly/annual parking charge?

- No, please complete justification in Section M above
- Yes, please complete section below:

- Monthly Parking Cost for Project Site (\$): \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked “no” this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_
  - Source of Requirement: \_\_\_\_\_

**Mitigation Measure 9c: On-Street Market Pricing**

Will this project and the city (in which the project is located) implement a pricing strategy which will increase the on-street public parking (e.g.: meter parking) by at least 25%?

- No, please complete justification in Section M above
- Yes, please complete section below:

- % Increase in Price:  25%  30%  40%  50%
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked “no” this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_
  - Source of Requirement: \_\_\_\_\_



### Mitigation Measure 9d: Transit Subsidy

- % of employees to receive public transit passes: \_\_\_\_\_
- Please select the closest expected Daily Transit Subsidy Amount (\$):  \$0.75  \$1.50  \$3  \$6
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 9e: Implement Employee Parking "Cash-Out"

Will the project require employers to offer employee parking "cash-out"?  
The term "cash-out" is used to describe the employer providing employees with a choice of forgoing their current subsidized/free parking for a cash payment.

- No, please complete justification in Section M above
  - Yes, please complete section below:
- % of employees to receive "cash-out": \_\_\_\_\_
  - Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
    - No, (note: if checked "no" this mitigation measure will require District enforcement)
    - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10a: Workplace Parking Charge

Will the project implement workplace parking pricing at its employment centers (e.g., explicitly charging for parking for its employees, not providing employee parking and transportation allowances, educating employees about available alternatives)?

- No, please complete justification in Section M above
  - Yes, please complete section below:
- % of employees paying for parking: \_\_\_\_\_
  - Please select the closest expected Daily Cash out Amount (\$):  \$1  \$2  \$3  \$6
  - Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
    - No, (note: if checked "no" this mitigation measure will require District enforcement)
    - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10b: Implement School Bus Program

Will the project work with the school district to restore or expand school bus services in the project area and local community?

- No, please complete justification in Section M above
  - Yes, please complete section below:
- % of families expected to using school bus program (those currently attending the school district): \_\_\_\_\_
  - Please select the closest expected Daily Cash out Amount (\$):  \$1  \$2  \$3  \$6
  - Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
    - No, (note: if checked "no" this mitigation measure will require District enforcement)
    - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10c: Encourage Telecommuting and Alternative Work Schedules

Will the project include the use of telecommuting or alternative work schedules to reduce the number of commute trips by employees?

- Percent of employees to participate in a 9/80 work schedule:  1%  3%  5%  10%  25%
- Percent of employees to participate in a 4/40 work schedule:  1%  3%  5%  10%  25%
- Percent of employees to participate in telecommuting 1.5 days:  1%  3%  5%  10%  25%
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10d: Market Commute Trip Reduction Option

Will the project implement marketing strategies to reduce commute trips (e.g., new employee orientation of trip reduction and alternative mode option, event promotions, publications)?

This measure should promote and educate employees on alternative transportation options

- No, please complete justification in Section M above
- Yes, please complete section below:
- % of Employees Eligible: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10e: Employee Vanpool/Shuttle

Will this project implement an employer-sponsored vanpool or shuttle?

Employer-sponsored vanpool programs entail an employer purchasing or leasing vans for employee use, and often subsidizing the cost of at lease program administration, if not more. Rider charges are normally set on the basis of vehicle and operating cost.

- No, please complete justification in Section M above
- Yes, please complete section below:
- % of employees participating in the vanpool program: \_\_\_\_\_
- % of vehicles for vanpooling: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 10f: Provide Ride Sharing Program

Will the project include a ride-sharing program?

- No, please complete justification in Section M above
- Yes, please complete section below:
- % of Employees participating in the ride-sharing program: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (note: if checked "no" this mitigation measure will require District enforcement)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 11: Hearth

Will the project include any woodstoves or fireplaces?

- No, *please complete justification in Section M above*  
 Yes, *please complete section below:*

- Only natural gas hearth
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (*note: if checked "no" this mitigation measure will require District enforcement*)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

### Mitigation Measure 12: Exceed Title 24

Will the energy efficiency rating of the project's building(s) be greater than California Title 24 requirements?

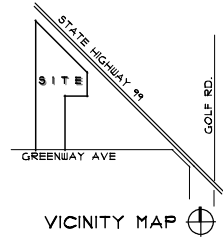
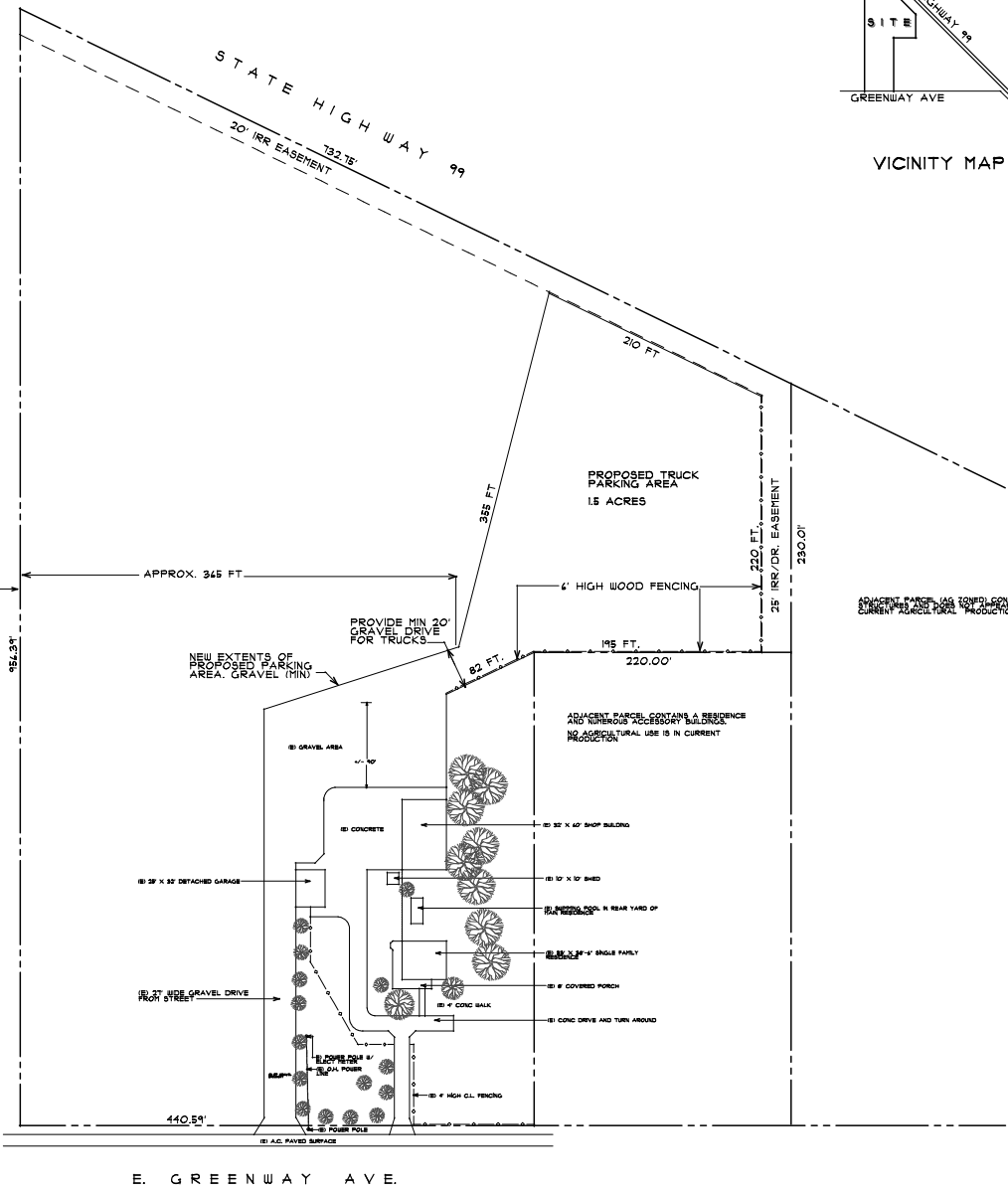
- No, *please complete justification in Section M above*  
 Yes, *please complete section below:*

- Percent of increase greater than California Title 24 requirements: \_\_\_\_\_
- Will this mitigation measure be required as a condition of approval by the land use agency, by other county or municipal codes, or other?
  - No, (*note: if checked "no" this mitigation measure will require District enforcement*)
  - Yes, Name of enforcing agency: \_\_\_\_\_  
Source of Requirement: \_\_\_\_\_

**Documentation:** Please attach relevant analysis or summary pages of Title 24 documentation.

Attached

124



DESIGNER/PLANS: CALIFORNIA AT HOME  
 SCOTT MOSE  
 P.O. BOX 828  
 OAKDALE, CA 95341  
 209-848-3771  
 CALIFORNIAATHOME@GMAIL.COM

SCOPE OF WORK: SITE PLAN FOR USE PERMIT FOR TRUCK PARKING

AG BUFFER STATEMENT:  
 PROPOSED TRUCK PARKING IS ADJACENT TO THE STATE HIGHWAY TO THE NORTH, NO AG BUFFER REQUIRED.  
 PROPOSED TRUCK PARKING IS 345 FT. FROM ADJACENT AGRICULTURAL PARCEL TO THE WEST, NO AG BUFFER REQUIRED.  
 PROPOSED TRUCK PARKING IS WITHIN THE 300 FT. AG BUFFER FROM THE PROPERTY TO THE EAST / SOUTH/EAST. PROVIDE 4' WOOD (OR EQ) FENCING AS NOTED ALONG THOSE SIDES OF THE PARKING AREA.  
 PROPOSED TRUCK PARKING IS MORE THAN 300 FT FROM THE ROADWAY FRONTING THE PROPERTY AND THEREFORE IS BEYOND THE 300 FT. WHERE AN AG BUFFER IS REQUIRED TO THE SOUTH.

ADJACENT PARCEL (AG ZONE) CONTAINS NO CURRENT OR ANTICIPATED PRODUCTION.

California at Home  
 Custom Residential Design & Drafting  
 PO BOX 1525 OAKDALE CA 95341  
 (209) 848-DR (4373)  
 www.californiaathome.com  
 email: californiaathome@gmail.com

PROPERTY: 005 & GREENWAY AVE.  
 ADDRESS: 1400 W. GREENWAY AVE. #500  
 APN: 004-028-011  
 STANISLAUS COUNTY

OWNER: TERRY BULLOCKS  
 3340 W. WILSON WAYS  
 CHERES, CA 95307

REVISION

DATE: 8/1/2023

SITE PLAN  
 VICINITY

SITE PLAN

SCALE: 1"=40'-0"

A.I.I

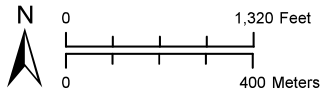
# LUCKY STAR LOGISTICS

## PLN2023-0134

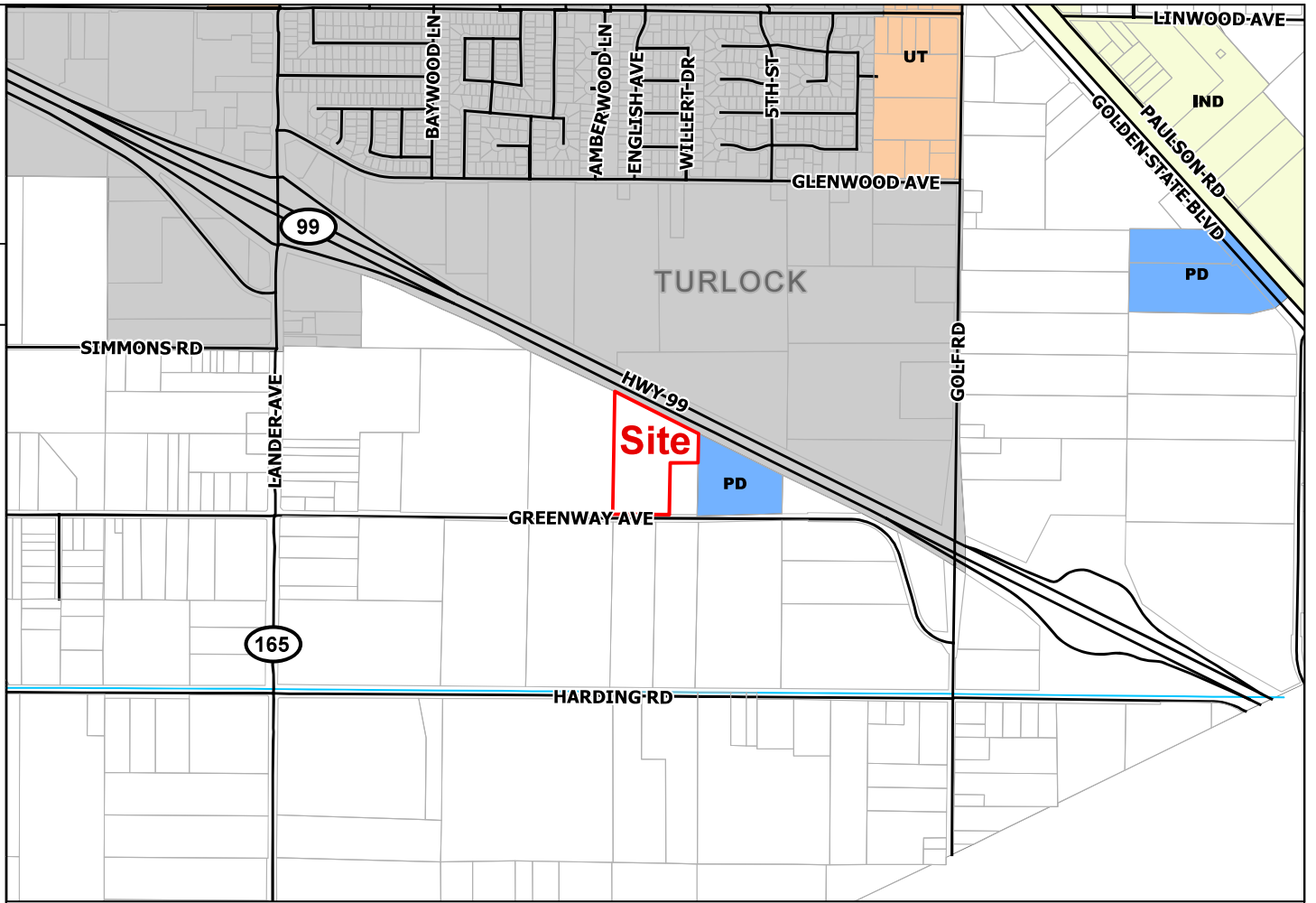
### GENERAL PLAN MAP

#### LEGEND

- Parcel
- Road
- Canal
- General Plan**
- Agriculture
- City
- Industrial
- Planned Development
- Urban Transition
- Project Site



Source: Planning Department GIS Date Exported: 10/23/2023








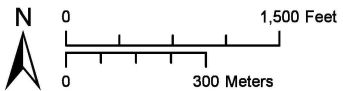
# LUCKY STAR LOGISTICS

## PLN2023-0134

### AERIAL AREA MAP

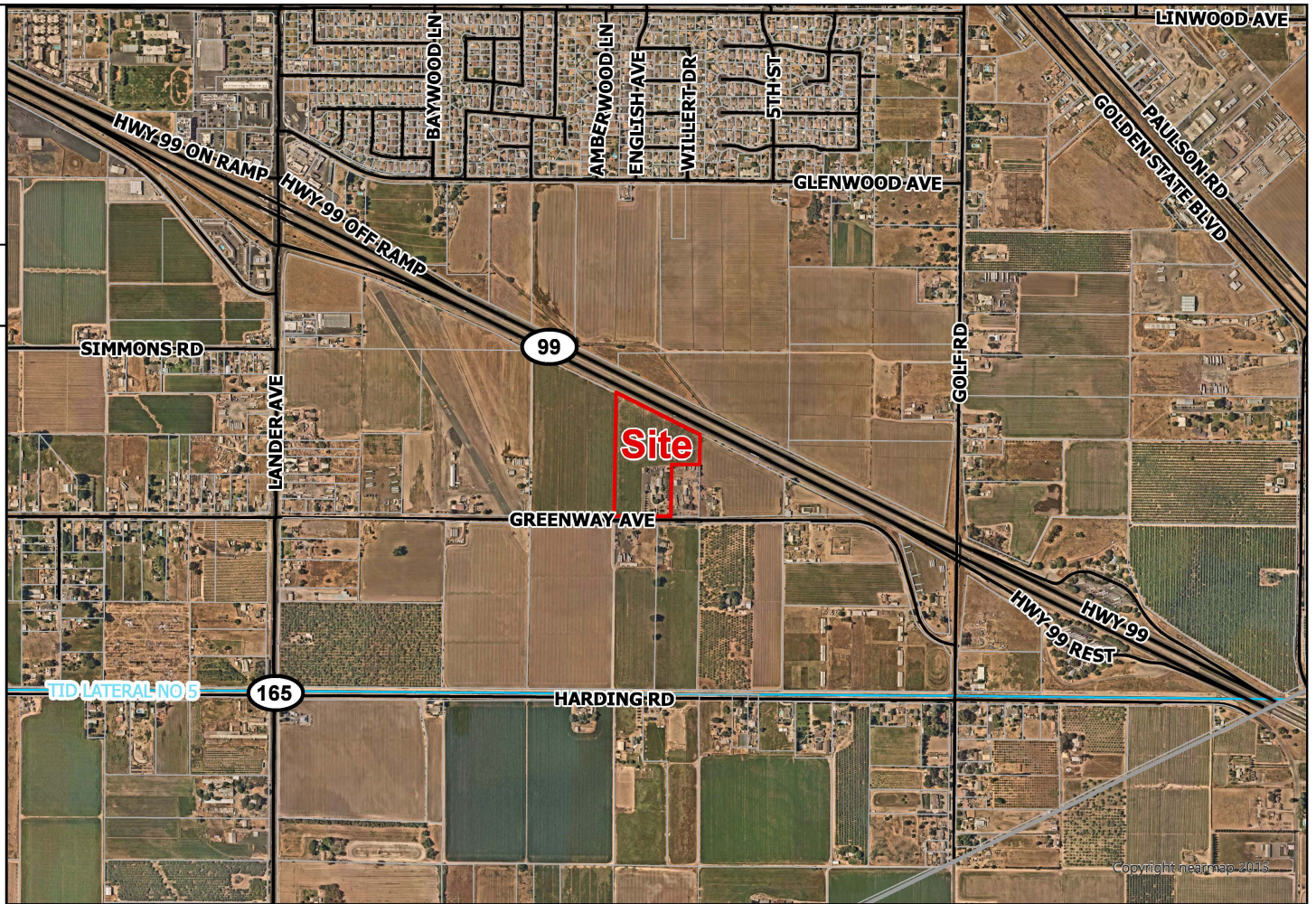
#### LEGEND

-  County Boundary
-  Project Site
-  Parcel
-  Road
-  Canal



Source: Planning Department GIS

Date Exported: 10/23/2023



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Emissions Estimator Worksheet

7/10/2024

Applicant/Business Name:	Raj Bhullar
Project Name:	Truck Parking Area
Project Location:	Turlock, CA
District Project ID No.:	

Project Construction Emissions												
If applicant selected Construction Clean Fleet Mitigation Measure - Please select "Yes" from dropdown menu												No
Project Phase Name	ISR Phase	Construction Start Date	NOx					PM10				
			Unmitigated Baseline <sup>(1)</sup> (TPY)	Mitigated Baseline <sup>(2)</sup> (TPY)	Achieved On-site Reductions <sup>(3)</sup> (tons)	Required Off-site Reductions <sup>(4)</sup> (tons)	Emission Reductions Required by Rule <sup>(5)</sup>	Unmitigated Baseline <sup>(1)</sup> (TPY)	Mitigated Baseline <sup>(2)</sup> (TPY)	Achieved On-site Reductions <sup>(3)</sup> (tons)	Required Off-site Reductions <sup>(4)</sup> (tons)	Emission Reductions Required by Rule <sup>(5)</sup>
Construction (Paving Only)	1	8/17/2024	0.0109	0.0109	0.0000	0.0022	0.0022	0.0002	0.0002	0.0000	0.0001	0.0001
	2				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	3				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	4				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	5				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	6				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	7				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	8				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	9				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
	10				0.0000	0.0000	0.0000			0.0000	0.0000	0.0000
		<b>Total</b>	<b>0.0109</b>	<b>0.0109</b>	<b>0.0000</b>	<b>0.0022</b>	<b>0.0022</b>	<b>0.0002</b>	<b>0.0002</b>	<b>0.0000</b>	<b>0.0001</b>	<b>0.0001</b>

Total Achieved On-Site Reductions (tons)		
ISR Phase	NOx	PM10
1	0.0000	0.0000
2	0.0000	0.0000
3	0.0000	0.0000
4	0.0000	0.0000
5	0.0000	0.0000
6	0.0000	0.0000
7	0.0000	0.0000
8	0.0000	0.0000
9	0.0000	0.0000
10	0.0000	0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>

Project Operations Emissions (Area + Mobile)														
Project Phase Name	ISR Phase	Operation Start Date	NOx					PM10						
			Unmitigated Baseline <sup>(1)</sup> (TPY)	Mitigated Baseline <sup>(2)</sup> (TPY)	Achieved On-site Reductions <sup>(3)</sup> (tons)	Required Off-site Reductions <sup>(4)</sup> (tons)	Total Emission Reductions Required by Rule <sup>(5)</sup>	Average Annual Emission Reductions Required by Rule <sup>(7)</sup>	Unmitigated Baseline <sup>(1)</sup> (TPY)	Mitigated Baseline <sup>(2)</sup> (TPY)	Achieved On-site Reductions <sup>(3)</sup> (tons)	Required Off-site Reductions <sup>(4)</sup> (tons)	Total Emission Reductions Required by Rule <sup>(5)</sup>	Average Annual Emission Reductions Required by Rule <sup>(7)</sup>
Operations	1	8/23/2024	0.4689	0.4689	0.0000	1.1722	1.1722	0.1172	0.1139	0.1139	0.0000	0.5694	0.5694	0.0569
	2				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	3				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	4				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	5				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	6				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	7				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	8				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	9				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
	10				0.0000	0.0000	0.0000	0.0000			0.0000	0.0000	0.0000	
		<b>Total</b>	<b>0.4689</b>	<b>0.4689</b>	<b>0.0000</b>	<b>1.1722</b>	<b>1.1722</b>	<b>0.1172</b>	<b>0.1139</b>	<b>0.1139</b>	<b>0.0000</b>	<b>0.5694</b>	<b>0.5694</b>	<b>0.0569</b>

Total Required Off-Site Reductions (tons)		
ISR Phase	NOx	PM10
1	1.1744	0.5695
2	0.0000	0.0000
3	0.0000	0.0000
4	0.0000	0.0000
5	0.0000	0.0000
6	0.0000	0.0000
7	0.0000	0.0000
8	0.0000	0.0000
9	0.0000	0.0000
10	0.0000	0.0000
<b>Total</b>	<b>1.1744</b>	<b>0.5695</b>

Notes:

TPY: Tons Per Year

(1) **Unmitigated Baseline:** The project's baseline emissions generated with no on-site emission reduction measures.

(2) **Mitigated Baseline:** The project's baseline emissions generated after on-site emission reduction measures have been applied.

(3) **Achieved On-site Reductions:** The project's emission reductions achieved after on-site emission reduction measures have been applied.

(4) **Required Off-site Reductions:** The project's remaining emission reductions required by Rule 9510 if on-site emission reduction measures did not achieve the required rule reductions.

(5) **Emission Reductions Required by Rule:** The project's emission reductions required (20% NOx and 45% PM10) for construction from the unmitigated baseline.

(6) **Total Emission Reductions Required by Rule:** The project's emission reductions required (33.3% NOx and 50% PM10) for operations from the unmitigated baseline over a 10-year period.

(7) **Average Annual Emission Reductions Required by Rule:** The project's total emission reduction for operations required by Rule 9510 divided by 10 years.

---

**ATTACHMENT 3 – PRIORITIZATION CALCULATOR**



**Name**

**Prioritization Calculator**

<b>Applicability</b>	Use to provide a Prioritization score based on the emission potency method. Entries required in yellow areas, output in gray areas.		
<i>Author or updater</i>	Matthew Cegielski	<i>Last Update</i>	December 1, 2022
<b>Facility:</b>	Luckey Star Logistics		
<b>ID#:</b>			
<b>Project #:</b>	Operations		
<b>Unit and Process#</b>	1-0 p1		

<b>Operating Hours hr/yr</b>		2,920.00			
<b>Receptor Proximity and Proximity Factors</b>		<b>Cancer Score</b>	<b>Chronic Score</b>	<b>Acute Score</b>	<b>Max Score</b>
<b>0&lt; R&lt;100</b>	<b>1.000</b>	3.23E-01	1.44E-03	0.00E+00	3.23E-01
<b>100≤R&lt;250</b>	<b>0.250</b>	8.09E-02	3.60E-04	0.00E+00	8.09E-02
<b>250≤R&lt;500</b>	<b>0.040</b>	1.29E-02	5.75E-05	0.00E+00	1.29E-02
<b>500≤R&lt;1000</b>	<b>0.011</b>	3.56E-03	1.58E-05	0.00E+00	3.56E-03
<b>1000≤R&lt;1500</b>	<b>0.003</b>	9.70E-04	4.32E-06	0.00E+00	9.70E-04
<b>1500≤R&lt;2000</b>	<b>0.002</b>	6.47E-04	2.88E-06	0.00E+00	6.47E-04
<b>2000&lt;R</b>	<b>0.001</b>	3.23E-04	1.44E-06	0.00E+00	3.23E-04

Receptor proximity is in meters. Prioritization scores are calculated by multiplying the total scores summed below by the proximity factors. Record the Max score for your receptor distance. If the substance list for the unit is longer than the number of rows here or if there are multiple processes use additional worksheets and sum the totals of the Max Scores.

Use the substance dropdown list in the CAS# Finder to locate CAS# of substances.

Substance	CAS# Finder
Wood preservatives (containing arsenic and chromate)	1206

Enter the unit's CAS# of the substances emitted and their amounts. Prioritization score for each substance generated below. Totals on last row.

Substance	CAS#	MW Correction	Annual Emissions (lbs/yr)	Maximum Hourly (lbs/hr)	Corrected Annual Emissions (lbs/yr)	Corrected Maximum Hourly (lbs/hr)	Average Hourly (lbs/hr)	Cancer	Chronic	Acute
Diesel engine exhaust, particulate matter (Diesel PM)	9901	1.0000	1.40E-01	4.79E-05	1.40E-01	4.79E-05	4.79E-05	3.23E-01	1.44E-03	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
		0.0000			0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
<b>Totals</b>								<b>3.23E-01</b>	<b>1.44E-03</b>	<b>0.00E+00</b>



## NEGATIVE DECLARATION

**NAME OF PROJECT:** Use Permit Application No. PLN2023-0134- Lucky Star Logistics, Inc

**LOCATION OF PROJECT:** 1005 East Greenway Avenue, south of Highway 99, between Lander Avenue and Golf Road, in the Turlock area.

**PROJECT DEVELOPERS:** Rajinder Bhullar  
3914 River Springs Way  
Ceres, CA 95307

**DESCRIPTION OF PROJECT:** Request to permit an existing tractor-trailer parking facility with up to twelve tractor and trailer combinations, on a 1.5-acre portion of a 10.3± acre parcel, in the General Agriculture (A-2-10) zoning district.

Based upon the Initial Study, dated **January 22, 2025**, 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 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: Marcus Ruddicks, 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. PLN2023-0134 - LUCKY STAR LOGISTICS, INC.**

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 CONSERVATION: Land Resources / Mine Reclamation		X	X		X							
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							
CITY OF: TURLOCK	X	X	X		X							
COOPERATIVE EXTENSION	X	X	X		X							
DISPOSAL DIST: TURLOCK SCAVENGER		X	X		X							
FIRE PROTECTION DIST: TURLOCK RURAL		X	X		X							
GSA: WEST TURLOCK SUBBASIN	X	X	X		X							
IRRIGATION DISTRICT: TURLOCK	X	X	X	X				X		X		X
MOSQUITO DISTRICT: TURLOCK	X	X	X		X							
STANISLAUS COUNTY EMERGENCY MEDICAL	X	X	X		X							
MUNICIPAL ADVISORY COUNCIL: KEYES	X				X							
PACIFIC GAS & ELECTRIC	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: TURLOCK UNIFIED	X	X	X		X							
SCHOOL DISTRICT 2: KEYES UNION	X				X							
STAN CO AG COMMISSIONER	X	X	X		X							
STAN CO BUILDING PERMITS DIVISION	X	X	X		X							
STAN CO CEO	X	X	X		X							
STAN CO DER	X	X	X	X				X		X		X
STAN CO GROUNDWATER RESOURCES	X	X	X	X				X		X		X
STAN CO FARM BUREAU	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							
STATE SWRCB DIVISION OF DRINKING WA	X	X	X		X							
SURROUNDING LAND OWNERS		X	X		X							
TELEPHONE COMPANY: AT&T	X	X	X		X							
INTERESTED PARTIES		X	X	X				X		X		X
US FISH & WILDLIFE	X	X	X		X							

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

Application Number: PLN2023-0134  
Application Title: LUCKY STAR LOGISTICS, INC  
Application Address: 1005 E GREENWAY AVE, TURLOCK, CA 95380  
Application APN: 044-028-011-000

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

Yes  No

If no, please sign and date below.

If yes, please provide the following information:

Applicant's Name: \_\_\_\_\_

Contributor or Contributor Firm's Name: \_\_\_\_\_

Contributor or Contributor Firm's Address: \_\_\_\_\_

Is the Contributor:

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

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

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

Name of Member: \_\_\_\_\_

Name of Contributor: \_\_\_\_\_

Date(s) of Contribution(s): \_\_\_\_\_

Amount(s): \_\_\_\_\_

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

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

02/24/2025  
Date

[REDACTED]  
Signature of Applicant

\_\_\_\_\_  
Print Firm Name if applicable

RAJINDER BHULLAR  
Print Name of Applicant

**UP PLN2023-0134**

# **LUCKY STAR LOGISTICS, INC.**

**Planning Commission**  
**April 3, 2025**



# Overview

- Request to permit an existing tractor-trailer parking facility for up to twelve tractor and trailer combinations, on a 1.5-acre portion of a 10.3± acre parcel, in the General Agriculture (A-2-10) zoning district.

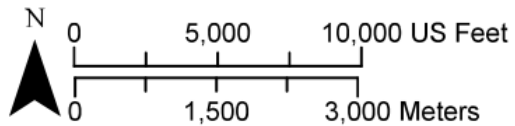
# LUCKY STAR LOGISTICS, INC

## UP PLN2023-0134

### AREA MAP

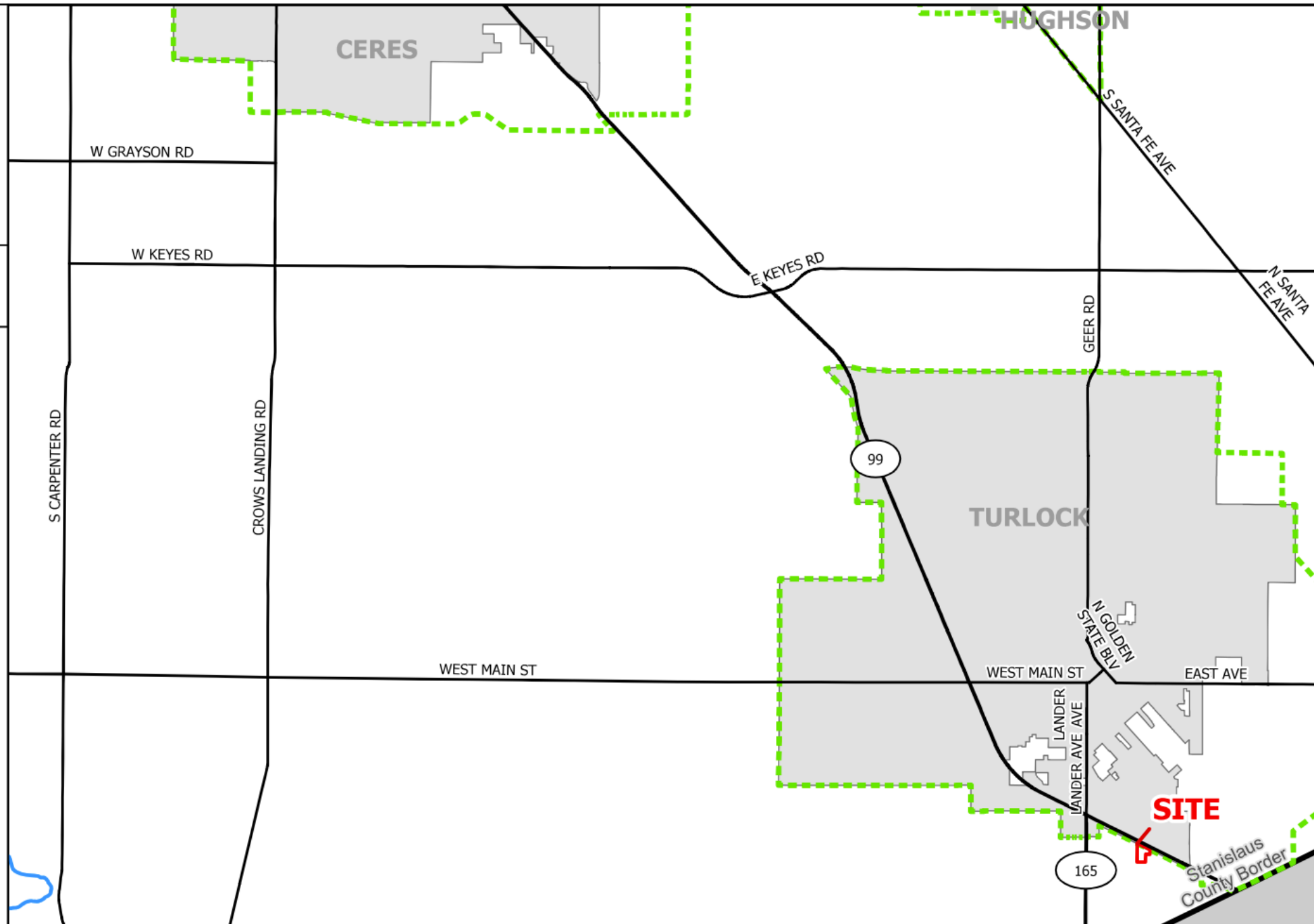
#### LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS

Date Exported: 1/6/2025



# LUCKY STAR LOGISTICS, INC




## UP PLN2023-0134

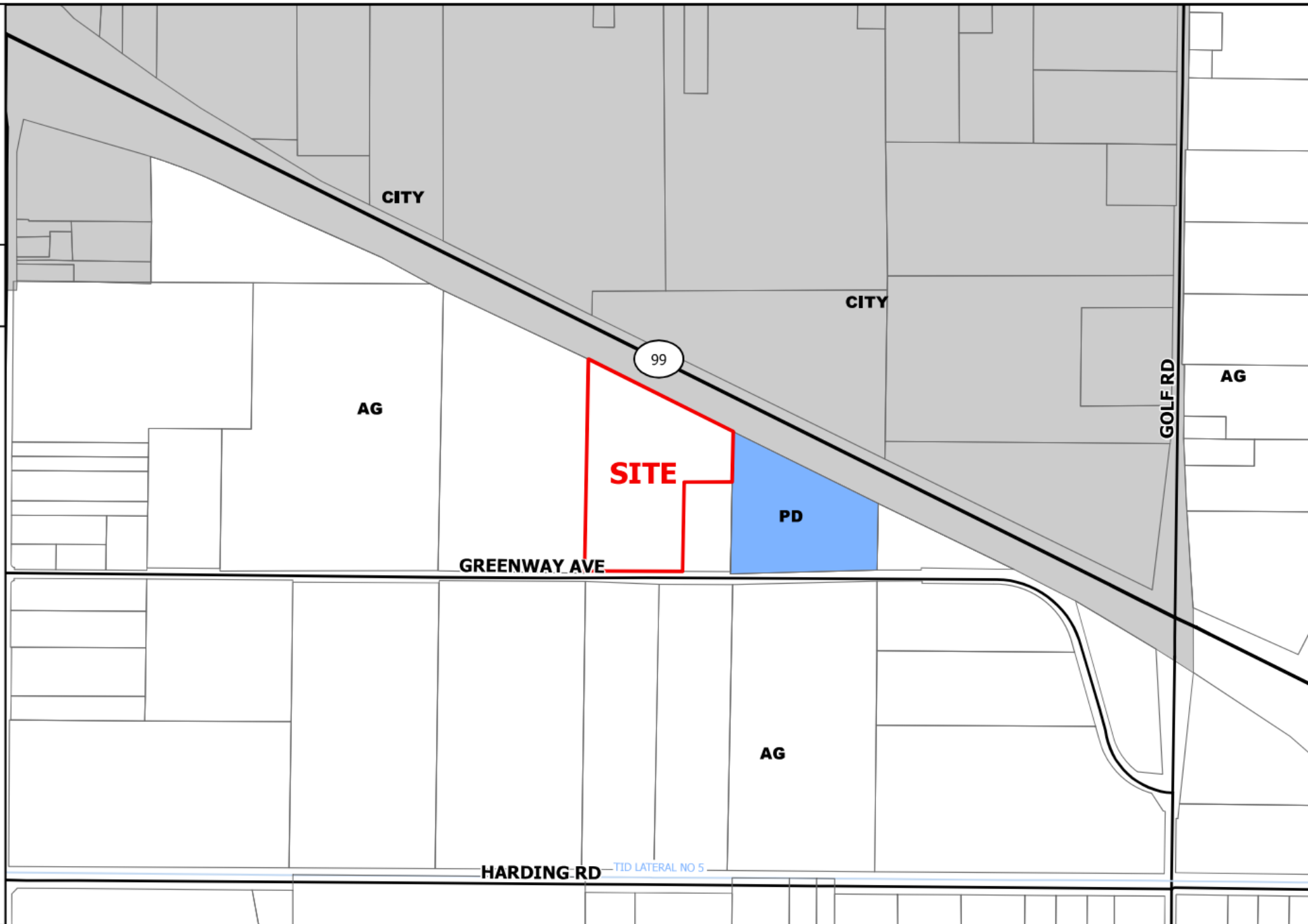
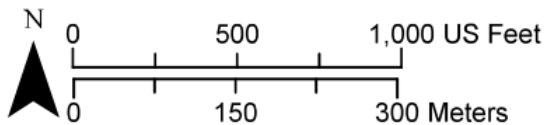
### GENERAL PLAN MAP

#### LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal

#### General Plan

-  Agriculture (AG)
-  City
-  Planned Development (PD)





# LUCKY STAR LOGISTICS, INC




## UP PLN2023-0134

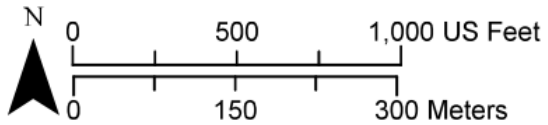
### ZONING MAP

#### LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal

#### Zoning Designation

-  City of Turlock
-  General AG 10 Acre (A-2-10)
-  Planned Development (P-D)



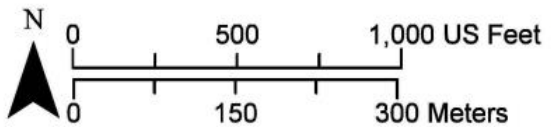
# LUCKY STAR LOGISTICS, INC

## UP PLN2023-0134

2023 AERIAL AREA MAP

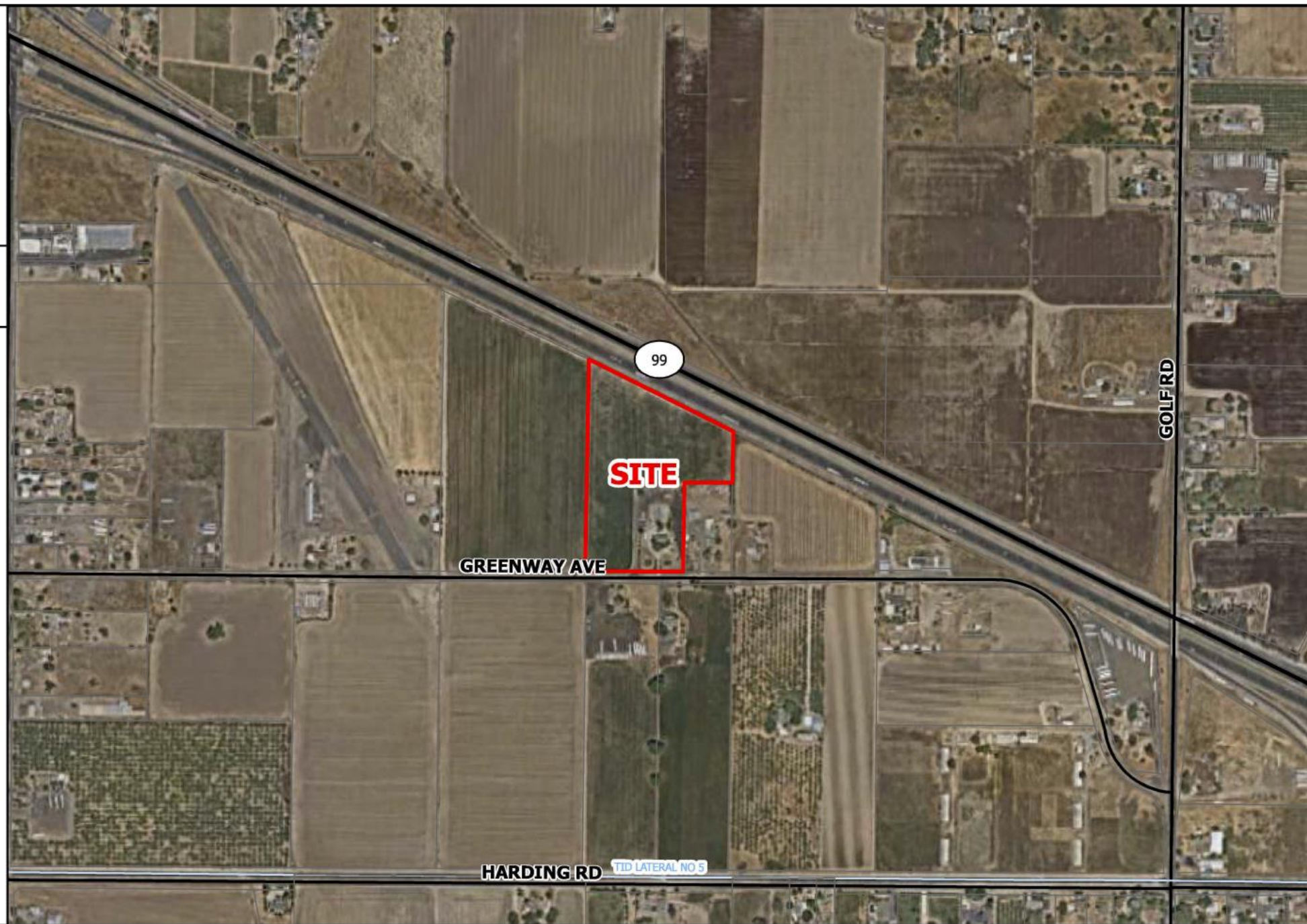
### LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 1/6/2025







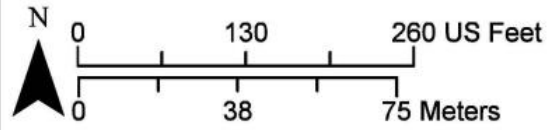
# LUCKY STAR LOGISTICS, INC

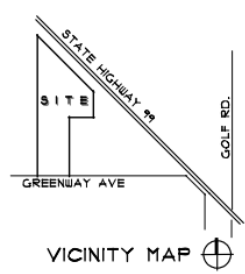
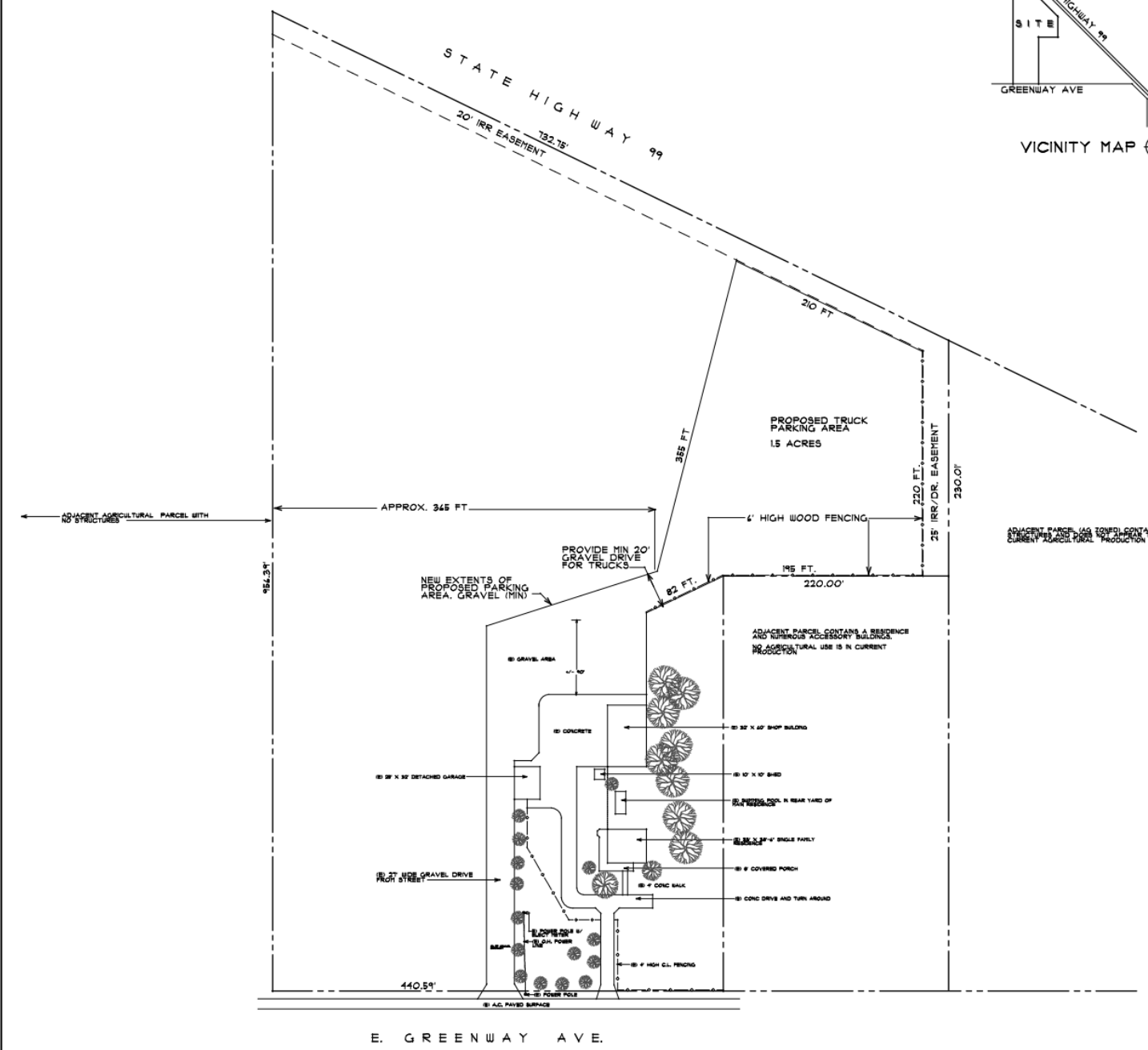
## UP PLN2023-0134

2023 AERIAL SITE MAP

### LEGEND

-  Project Site
-  Parcel
-  Highway
-  Street





**DESIGNER/PLANS:** CALIFORNIA AT HOME  
SCOTT HICKS  
P.O. BOX 825  
OAKDALE, CA 95341  
209-848-5121  
CALIFORNIAATHOME@GMAIL.COM

**SCOPE OF WORK:** SITE PLAN FOR USE PERMIT FOR TRUCK PARKING

**AG BUFFER STATEMENT:**

PROPOSED TRUCK PARKING IS ADJACENT TO THE STATE HIGHWAY TO THE NORTH. NO AG BUFFER REQUIRED.

PROPOSED TRUCK PARKING IS 345 FT. FROM ADJACENT AGRICULTURAL PARCEL TO THE WEST. NO AG BUFFER REQUIRED.

PROPOSED TRUCK PARKING IS WITHIN THE 300 FT. AG BUFFER FROM THE PROPERTY TO THE EAST & SOUTH/EAST. PROVIDE 4' WOOD (OR EQ.) FENCING AS NOTED ALONG THOSE SIDES OF THE PARKING AREA.

PROPOSED TRUCK PARKING IS MORE THAN 300 FT FROM THE ROADWAY FRONTING THE PROPERTY AND THEREFORE IS BEYOND THE 300 FT. WHERE AN AG BUFFER IS REQUIRED TO THE SOUTH.

**California at Home**  
Custom Residential Design & Drafting  
PO BOX 825 OAKDALE CA 95341  
(209) 848-5121  
www.californiaathome.com  
email: californiathome@gmail.com

**PROPERTY LOCATION STATEMENT:**  
PROPERTY LOCATED AT GREENWAY AVE.  
TUBOLOCA, CA 95300  
APN: 004-028-011  
STANISLAUS COUNTY

**OWNER:**  
SHULLAS  
414 DRIVER SPRINGS WAY  
CERES, CA 95301

REVISION:

DATE: 6/7/2023

**SITE PLAN VICINITY**

E. GREENWAY AVE.

# April 2, 2025 Site Visit Photographs



# April 2, 2025 Site Visit Photographs



# April 2, 2025 Site Visit Photographs



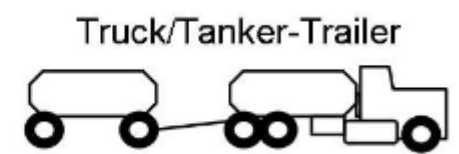
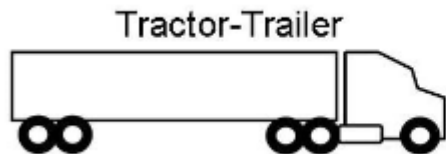
# December 2024 Google Street View





# Background

- Truck Parking allowance in the General Agriculture (A-2) Zoning District, created by Ordinance Amendment in 2012
- Applicable to tractor-trailer combinations defined as:
  - “Tractor-trailer, truck/trailer, or truck/tanker-trailer combination with a minimum of five axles and capable of hauling a combined gross vehicle weight (GVW) of eighty thousand pounds” – §21.94.050 & 21.20.030(G)
- Trucks used by other permitted businesses not included



# Background – Truck Parking in the A-2

- **Prior to 2012 Ordinance Amendment:**
  - Truck parking facilities only permitted if:
    - Considered an Agricultural Service Establishment (i.e. serving farmers exclusively for raw unprocessed produce)
    - Accessory to another permitted A-2 use (processors, hullers, shellers, etc.)
    - A General Plan Amendment & Rezone was obtained to amend the GP/zoning
  - 2008: intensification of unpermitted truck parking facilities
    - 20 concurrent code enforcement cases
    - In response, truck operators formed informal group to discuss with County
    - Ad Hoc Committee formed by the General Plan Update Committee to help develop the 2012 Ordinance Amendments to create parameters/framework to create allowance while addressing nuisances/concerns related to the use

# Background – Truck Parking in the A-2

- 2012 Ordinance Amendment adopted by Board of Supervisors (BOS):
- Two permitting pathways:
  1. **Home Occupation Business License (over-the-counter) – 21.94.020(J)(4)**
    - Park up to 3 tractors, 3 trailers, all registered to business operator
    - Business operator = on-site resident
    - 1-acre parcel minimum; parking area no more than 50% of parcel up to 1.5 acres
    - Limited on-site maintenance
  2. **Use Permit (Planning Commission) – 21.20.030(G) <= Current Request**
    - Park up to 12 tractors, 24 trailers, one registered to business operator
    - Business operator = property owner, must live on-site
    - 1-acre parcel minimum; parking area no more than 50% of parcel up to 1.5 acres
    - Limited on-site maintenance
    - 1,500sf office only
    - Subject to finding that approval will not result in a concentration of commercial/industrial uses in vicinity

# Background – Truck Parking in the A-2

- 28 Use Permit applications received
  - 8 approved, 0 denied, 12 withdrawn
  - 8 concurrent applications currently in process
- 5 General Plan Amendments and Rezone applications for A-2 zoned parcels to allow truck parking which exceeds allowance:
  - 3 in review; Pending Planning Commission consideration
  - 2 pending Board of Supervisors (BOS) final consideration:
    - Planning Commission recommendation: one denial, one approval
    - Both continued by BOS on 12/17/24 to 8/19/25

# Background – Truck Parking in the A-2

- Due to the increase in cases resulting in complaints surrounding this issue, the County has started the process to evaluate the allowance of parking facilities for trucks in the A-2 zoning district
- On January 16, 2025, the Planning Director formed an ad hoc committee, comprised of Supervisor Chiesa and Planning Commissioner Morad and support by staff from various County departments.
  - Currently researching, conducting public outreach, and developing land use policy recommendations for how to address truck parking in the A-2.
  - These recommendations could include amendments to the current ordinances to modify, reduce, or eliminate the allowance, and define what a concentration is.

# Issues Overview

- Community Opposition
- Size of the Parking Area
- Existing Unpermitted Uses of the Site
- Concentration of Commercial Uses
- Surface Transportation Assistance Act (STAA) Access

# Issues- Community Opposition

- Two letters of opposition received:
  - One from a neighboring landowner located 0.63 miles southeast of the project site with concerns regarding truck parking in the A-2 zoning district including damage to local roads and converting agricultural land to commercial uses
  - Another was received from an interested individual opposed to truck parking operations in the A-2 zoning district for many of the same reasons

# Issues- Size of the Parking Area

- The total proposed parking area is 2.05± acres including the driveway.
- Historically, staff has included driveways in the 1.5 acre size limitation calculation
- COA No. 16(e) requires the area graveled and graded for the parking area to be no larger than 1.5 acres in size, including the driveway.



# Issues- Existing Unpermitted Uses

- Code Enforcement case opened September 2023
- Application submitted October 2023
- Website was found for Greenway Truck and Trailer Repair Inc., a mobile business offering roadside repair services.
- COA No. 11 requires a Stanislaus County business license to be obtained, which will need to meet the provisions of a home occupation.

# Issues- Concentration of Commercial Uses

- Within a 1-mile radius of the project site, there are 14 truck parking facilities documented as of 2024.
- 1 approved site (Use Permit No. PLN2016-0029- *Grewal Truck Parking*)
- 5 facilities with home occupation business licenses
- 8 unpermitted facilities in the A-2 zoning district

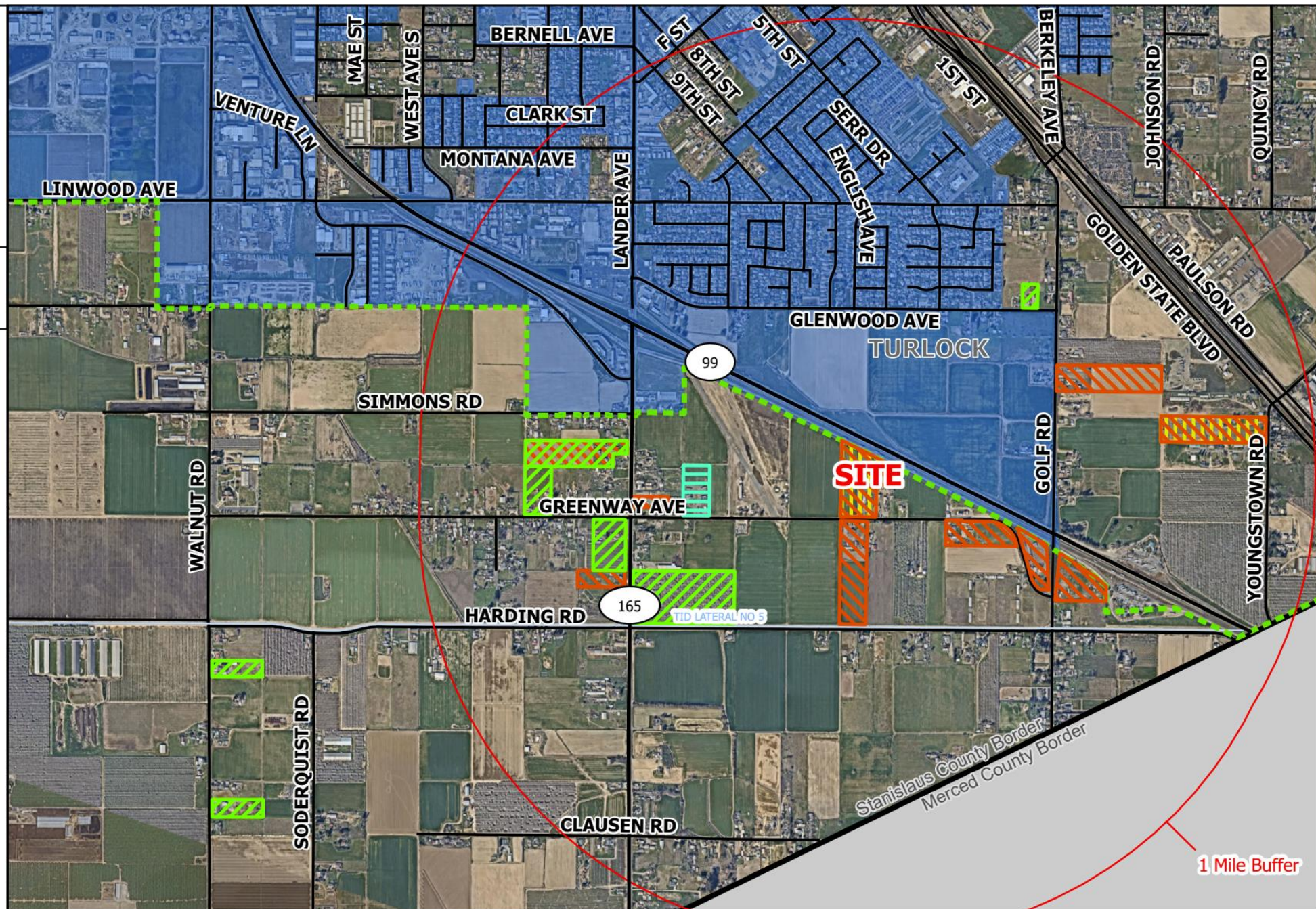
# LUCKY STAR LOGISTICS, INC

## UP PLN2023-0134

Truck Parking Locations  
1-Mile Radius of Project Site

### LEGEND

-  Project Site
-  1 Mile Buffer
-  Home Occupation Business Licenses
-  Code Enforcement Cases
-  Current Planning Applications
-  Approved Use Permits
-  Sphere of Influence
-  Highway
-  Street
-  Canal



# Issues- Surface Transportation Assistance Act (STAA) Access

- Trucks to be parked on-site meet the threshold of Surface Transportation Assistance Act (STAA) requirements
  - STAA rated trucks are limited to traveling on state highways and local roads which are designated as approved STAA access routes due to their larger turning radius
- East Greenway Avenue is not a designated STAA access route, and the applicant will need to receive approval of an access route from Public Works and Caltrans
  - If turning movements cannot safely be made, incompatible intersections may require upgrades such as restriping, road widening, relocation of street improvements such as lights, power poles, or signage
  - COA Nos. 17 and 18 have been added to the project addressing STAA requirements.

# General Plan and Zoning Ordinance Consistency

## General Plan

- Land Use Element designation
  - Agriculture
- Agricultural Element
  - Policy 1.10 – Agricultural Buffers

## Zoning

- General Agriculture (A-2-40)
  - Use Permit
  - Staff does not believe the project meets all Use Permit Criteria for Truck Parking

# Environmental Review

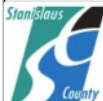
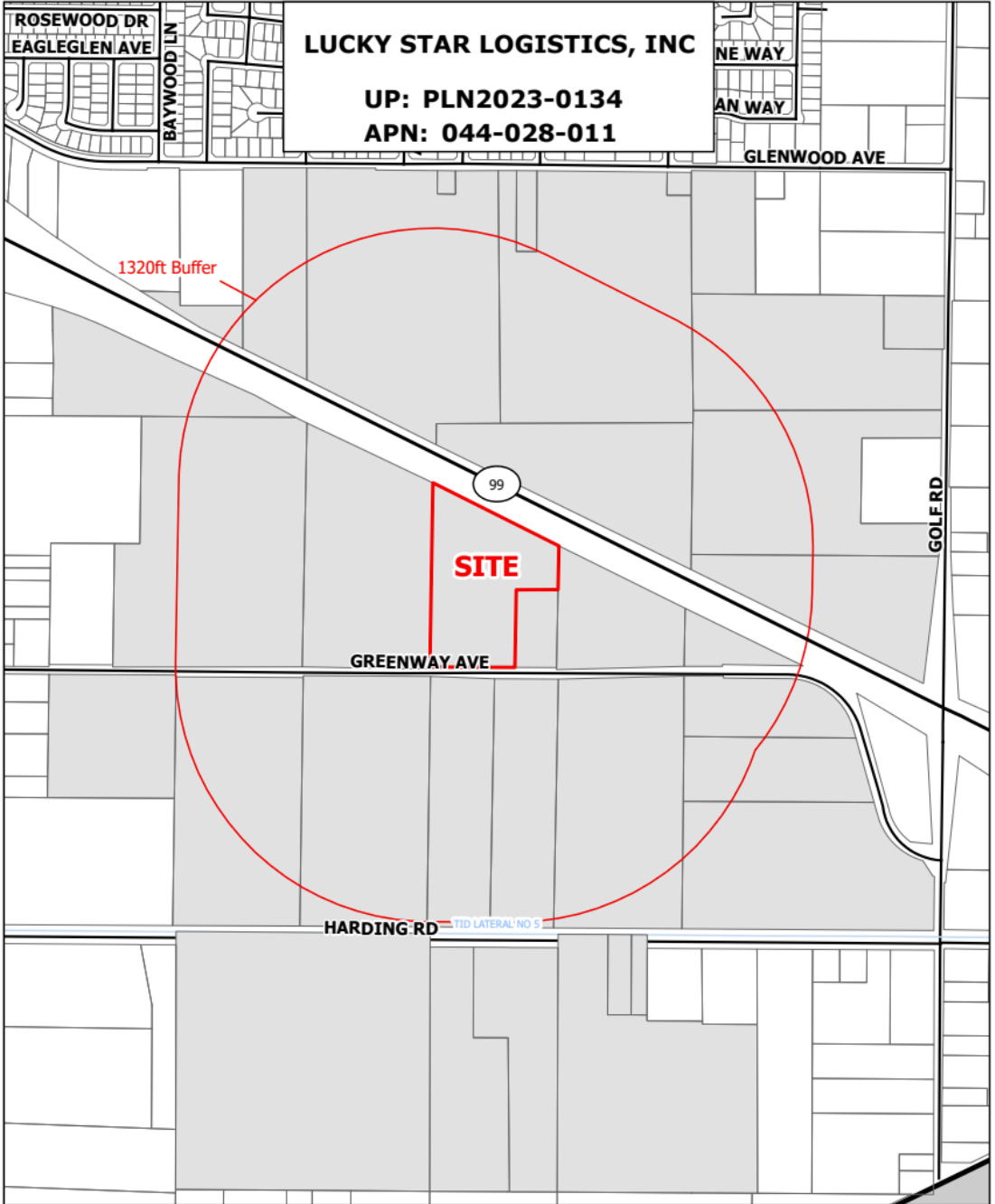
- CEQA
  - Negative Declaration
  - Conditions of Approval

# Planning Commission Determination

- Staff recommends that the Planning Commission deny the project as proposed.
- Findings – Exhibit A
  - Environmental Review
  - Use Permit findings
  - Concentration
  - Truck Parking Criteria met – 21.20.030(G)
  - Agricultural buffer
  - Road Dedication
  - Project Approval

# Questions?





**LAND OWNER NOTIFICATION AREA**  
JANUARY 6, 2025      Total Parcels - 35

