City of Ceres

Whitmore Ranch Specific Plan

Final Environmental Impact Report

(SCH# 2017012063)

Prepared for:

Prepared by:

AECOM

with assistance from Economic and Planning Systems, KD Anderson & Associates, Inc., and O'Dell Engineering

October 2018

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ACRONYMS AND ABBREVIATIONS

ARB	California Air Resources Board
CALGreen Code	California Green Building Standards Code
CEQA	California Environmental Quality Act
City	City of Ceres
CUSD	Ceres Unified School District
dB	decibel
Draft EIR	Draft Environmental Impact Report
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPAP	Existing plus Approved Projects
ERC	Environmental Review Committee
Final EIR	Final Environmental Impact Report
GHG	greenhouse gas
HCM	Highway Capacity Manual
HVAC	heating, ventilation, and air conditioning
ITE	Institute of Transportation Engineers
LAFCO	Local Agency Formation Commission
L_{dn}	Day-Night Average Noise Level
L_{eq}	Equivalent Noise Level
L_{max}	Maximum Noise Level
LOS	Level of Service
$MTCO_2e$	metric tons of carbon dioxide equivalents
NOP	notice of preparation
NO_X	nitrogen oxides
PFF	Public Facilities Fee
PG&E	Pacific Gas and Electric Company
PM	particulate matter
ppd	pounds per day
SB	Senate Bill
SCERC	Stanislaus County Environmental Review Committee
Specific Plan	Whitmore Ranch Specific Plan
SR	State Route
SRTS	Safe Routes to School
State Clearinghouse	Governor's Office of Planning and Research
TID	Turlock Irrigation District
tpd	tons per day
VMT	vehicle miles traveled
vph	vehicles per hour
WTE	waste-to-energy

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1 INTRODUCTION

The City of Ceres (City) prepared an environmental impact report (EIR) to evaluate the potential environmental effects of the proposed Whitmore Ranch Specific Plan (Specific Plan), also referred to as "the proposed project," in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

1.1 INPUT ON THE DRAFT EIR

Pursuant to Section 15082 of the CEQA Guidelines, the City prepared a CEQA notice of preparation (NOP) and provided copies directly by mail and through the Governor's Office of Planning and Research (State Clearinghouse) to CEQA responsible and natural resource trustee agencies, local municipalities, interested persons, organizations, agencies, and landowners. The City issued the NOP for the Specific Plan EIR on February 1, 2017, and comments were accepted for a 30-day period ending on March 2, 2017.

The Draft EIR (State Clearinghouse Number 2017012063) was received by the State Clearinghouse and circulated for a 45-day public review period from June 27 through August 13, 2018. In addition, the City held a public meeting during the comment period. The meeting was held at the Ceres Community Center, 2701 Fourth Street in Ceres, on August 6, 2018.

In accordance with Section 15088 of the CEQA Guidelines, the City, as the lead agency, has reviewed the comments received on the Draft Environmental Impact Report (Draft EIR) for the proposed project and has prepared written responses to the comments received.

1.2 ORGANIZATION OF FINAL EIR

The City prepared this Final EIR, which includes:

- A full list of agencies, organizations, and individuals that provided comments on the Draft EIR;
- Verbatim comments on the Draft EIR;
- A summary of comments and responses to comments on the Draft EIR; and
- Minor revisions to the Draft EIR detailed in Chapter 3, "Errata," of this Final EIR.[1]

Chapter 2, "Comments and Responses to Comments" of this Final EIR includes the written and verbal comments received on the Draft EIR and responses to these comments (as required by the CEQA Guidelines Section 15132). To assist the reader, each response includes a summary of the comment. The range of responses include providing clarification on the Draft EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by decision makers when the comment does not relate to the adequacy of the EIR for addressing potential adverse physical environmental effects of the project.

In some instances, responses to comments may warrant modification of the text of the Draft EIR. In those cases, the text of the Draft EIR is revised and the changes compiled in Chapter 3, "Errata" of this Final EIR. The text

[1] Chapter 3, "Errata," includes only pages of the Draft EIR where revisions have been made, not the entire Draft EIR.

deletions are shown in strikeout (strikeout) and additions are shown in underline (underline). The revisions summarized in Chapter 3 of this Final EIR do not change the findings presented in the Draft EIR.

This document and the Draft EIR together constitute the Final EIR that the City Council will consider. Appendix A is the revised traffic report and Appendix B is the Mitigation Monitoring and Reporting Program.

1.3 USE OF THE FINAL EIR

The Final EIR allows the public and the City decision makers an opportunity to review revisions to the Draft EIR and the Responses to Comments. The Final EIR serves as the environmental document to inform the City Council's consideration of the proposed project, either in whole or in part, or one of the alternatives to the project discussed in the Draft EIR.

As required by Section 15090(a)(1)-(3) of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.

2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.

3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

2 COMMENTS AND RESPONSES TO COMMENTS

This section of the Final EIR contains comment letters received during the public review period for the Draft EIR.

The Final EIR contains comment letters received during the 45-day public review period for the Draft EIR, which concluded on August 13, 2018. In conformance with CEQA Guidelines Section 15088(a), the City has prepared written responses to all comments that addressed environmental issues related to the Draft EIR. The City's response to comments focuses on the disposition of significant environmental issues as specified by Section 15088(c) of the CEQA Guidelines.

2.1 LIST OF COMMENTERS

Table 2-1 identifies a number for each comment letter received, the author of the comment letter, and the date received. Each comment letter is included in its entirety for decision maker consideration before each response.

Table 2-1 Comments Received on the Draft EIR

Letter #	Commenter	Date Received
1	California Department of Resources Recycling and Recovery	July 3, 2018
2	California Department of Transportation	August 9, 2018
3	Lozano Smith Attorney at Law for the Ceres Unified School District	August 13, 2018
4	Stanislaus County Environmental Review Committee	August 14, 2018
5	Stanislaus County Local Agency Formation Commission	August 13, 2018
6	Turlock Irrigation District (Letter 1)	July 25, 2018
7	Turlock Irrigation District (Letter 2)	August 15, 2018
8	Patricia Cousins and Stella Coakley	August 6, 2018
9	Governor's Office of Planning and Research, State Clearinghouse	August 13, 2018
10	Public Comments Received at the Public Workshop	August 6, 2018

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2.2 COMMENTS AND RESPONSES ON THE DRAFT EIR

The written comments received on the Draft EIR and the responses to those comments are provided in this section. Similar comments are provided with a categorical response. Each comment letter is reproduced in its entirety. Responses to comments follow the comment letters. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

The Final EIR considers comment letters shown in Table 2-1 and provides text changes, where appropriate, shown in strikethrough for deleted text and underlined for corrected and/or clarified changed text.

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Letter 1

To: Tom Westbrook; Gerken, Matthew

Subject: RE: thought you should know ...

From: Tom Westbrook
Sent: Tuesday, July 03, 2018 12:36 PM
To: Gerken, Matthew
Subject: Fwd: thought you should know …

Matthew,

Please see below from CalRecycle. Do we need to discuss?

TW
>>> "Brainin, Paul 7/3/2018 11:53 AM >>> Hello.

I was looking for references to CALGreen on your website so I did a search. (Only three items were given; none were for education and outreach about diversion requirements for permit applicants.) A document that showed up was https://www.ci.ceres.ca.us/DocumentCenter/View/2286/Draft-Environmental-Impact-Report-DEIR?bidId=. From what I can see, it is a draft environmental impact report (DRAFT EIR) prepared for and on behalf of the city of Ceres by a vendor, AECom.

Though it is not a source of CALGreen information for use by potential permit applicants, I took a quick peek and saw a couple things about which I thought you would want to know, especially considering the document was recently released as a draft. I did not read the entire report, but did notice the below items:

- It erroneously defines "CalRecycle" in the "ACRONYMS AND ABBREVIATIONS" section as "California Integrated Waste Management Board."
    - The CIWMB has not existed since 2009. I would expect a consultant would know or have researched that.

1-1

- On page 340, the DRAFT EIR states:
  "Solid waste is collected in the city and disposed of at the Fink Road Landfill, located at 4000 Fink Road, and then processed at the Stanislaus Resource Recovery Facility, located at 4040 Fink Road, which is a waste-to-energy (WTE) facility." …

  "CalRecycle estimates that the Fink Road Landfill has a capacity until 2023." ….

  "The California Integrated Waste Management Board of 1989 requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills. For 2015, the target solid waste generation rate for Stanislaus County is 6.3 pounds per day (ppd) per resident, and the actual measured generation rate was 4.5 ppd per resident, which is approximately 1.8 ppd less than the target solid waste generation rate (CalRecycle 2016c)."
    - The DRAFT EIR does not reflect my understanding of how waste (trash) is sent to the WTE facility. I was told a contracted amount (tonnage) of waste is sent directly there for

1-2

disposal (transformation) before any is processed or disposed of at the Fink Road landfill, because there are financial penalties if the contracted number of tons is not sent to the WTE facility. Residual ash (waste) actually goes to Fink from the WTE facility after burning. 1-2 (cont)

- Estimates of landfill capacity come from the County, not CalRecycle. The County completes a Five-Year Countywide Integrated Waste Management Plan Review Report that includes estimates of its landfills' capacities. 1-3
- The DRAFT EIR erroneously refers to "The California Integrated Waste Management Board of 1989." It should be "The California Integrated Waste Management **Act** of 1989." 1-4
- The DRAFT EIR erroneously refers to disposal as "generation" so its calculations in this regard are not based upon the desired metrics, which would make its conclusions of waste generation from the area of interest inaccurate; thus, the calculated impact of waste from the area of interest may be inaccurate. For example, the Draft EIR inaccurately states "For 2015, the target solid waste generation rate for Stanislaus County is 6.3 pounds per day (ppd) per resident, and the actual measured generation rate was 4.5 ppd per resident, …" An accurate statement, using the same numbers from the 2015 annual report, would be, "For 2015, the target solid waste **disposal** rate for the **Stanislaus County Regional Solid Waste Planning Agency** is 6.3 pounds per day (ppd) per resident **in order to achieve a 50% rate of diversion**, and the actual, measured **disposal** rate was 4.5 ppd per resident, which shows the **actual diversion rate was greater than 50%.**" 1-5

  (Generally speaking, waste generation equals disposal plus diversion.) It is my understanding that you are aware how CalRecycle now uses disposal to estimate 50% diversion, but please call me if you have any questions about it. 1-6

- On page 347, the DRAFT EIR includes, "Chapter 7, Section 708, of the 2016 CALGreen Code requires all construction contractors to reduce construction waste and demolition debris by 50 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken." 1-7
  - In Ch. 7 of the 2016 CALGreen, I find no section 708, nor any discussion of a requirement for construction contractors to reduce construction waste and demolition debris by 50 percent.
  - As we have discussed, chapters 4 and 5 of CALGreen require 65% diversion of construction and demolition wastes.
  - I also noted on our site visit that Ceres's franchise hauler agreement provides (in Sec. 34.E.) that the hauler "shall provide sufficient bins to allow for the separation of materials to ensure diversion and recycling, if applicable." And "The "ARRANGER/TRANSPORTER", at a minimum, shall furnish to the City Manager or his/her designee reports verifying:
    - The total number of tons of materials collected on construction/demolition projects; and,
    - The number of materials and tons separately disposed and recycled at disposal facilities or recycling facilities, if applicable."
      - (None of these seem to be getting done, as I we previously discussed.) 1-8
- On page 367, the DRAFT EIR states:
  "CalRecycle estimates a residential solid waste generation rate for the Stanislaus County 1-9

Regional Solid Waste Planning Agency area, which includes the City of Ceres, would be approximately 4.2 pounds per resident per day, or 0.002 tpd (CalRecycle 2016c). Therefore, the estimated total population for the proposed Specific Plan (1,485 persons) would generate approximately 3.0 tpd of solid waste (0.002 × 1,485).

"Solid waste collected from the Specific Plan Area would be hauled to the Fink Road Landfill, which has a maximum permitted throughput of 2,400 tpd. The estimated 3.0 tpd of solid waste generated by the proposed Specific Plan would be less than one percent of the maximum tpd that could be received at the landfill.

"CalRecycle estimate that the Fink Road Landfill has a capacity until 2023. However, based on lower disposal rates, the County recently revised its projections for the life of the landfill to 2029 for Class III waste and 2043 for Class II (Stanislaus County 2014). In addition, the County has initiated plans for an expansion and reconfiguration of the existing facility to extend its useful life by another 10 to 15 years beyond the revised projections (Stanislaus County 2009:2-1). Therefore, the Fink Road Landfill has sufficient permitted capacity to accommodate solid-waste disposal needs for the proposed Specific Plan. This impact is considered **less than significant.**"

1-9 (cont)

- As noted above, CalRecycle does not estimate a waste generation rate. CalRecycle receives disposal tonnage information from local sources via the Disposal Reporting System (DRS).
- As noted above, the DRAFT EIR erroneously refers to disposal as "generation" so its calculations in this regard are not based upon the desired metrics, which may make its conclusions of waste generation from the area of interest inaccurate.

1-10

- As noted above, CalRecycle does not estimate landfill capacity. Please note that the above text does correctly state, "… the County recently revised its projections for the life of the landfill …" This correctly states the County (not CalRecycle) made the projections (or estimates) of landfill capacity and its lifespan.

1-11

Please contact me if you have any questions.

Thank you.

Paul Brainin
Environmental Scientist
Local Assistance & Market Development Branch
Department of Resources Recycling and Recovery (CalRecycle)

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2.2.1 RESPONSE TO COMMENT LETTER 1 – CALIFORNIA DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

RESPONSE TO COMMENT 1-1

The commenter states that the Draft EIR erroneously defines "CalRecycle" in the "Acronyms and Abbreviations" section as "California Integrated Waste Management Board."

On page ix of the Table of Contents, the acronym for CalRecycle has been corrected as follows:

CalRecycle	~~California Integrated Waste Management Board~~ California Department of Resources Recycling and Recovery

RESPONSE TO COMMENT 1-2

The commenter states that the Draft EIR does not reflect how waste is sent to the Stanislaus Resource Recovery waste-to-energy (WTE) Facility and that waste can be sent directly there for disposal (transformation) before any is processed or disposed of at the Fink Road landfill.

The following revision has been made on page 3.13-14 in Section 3.13, "Public Services and Utilities, including Recreation and Energy," of the Draft EIR. Please see Chapter 3 of this Final EIR, "Errata." These edits clarify that solid waste can be disposed of at either the Fink Road Landfill or Stanislaus Resource Recovery Facility. These edits do not change the analysis or conclusions of the Draft EIR.

> Solid waste is collected in the city and disposed of at either the Fink Road Landfill, located at 4000 Fink Road, ~~and then processed~~ or at the Stanislaus Resource Recovery Facility, located at 4040 Fink Road, which is a waste-to-energy (WTE) facility.

RESPONSE TO COMMENT 1-3

The commenter states that estimates of landfill capacity come from the County as part of the County's Five-Year Countywide Integrated Waste Management Plan Review Report.

The following revision has been made on page 3.13-14 in Section 3.13 of the Draft EIR. Please see Chapter 3 of this Final EIR, "Errata." These edits clarify that estimates of landfill capacity are provided by the County as part of the County's 5-year permit review report and provides the closure date of the Fink Road Landfill based on the most recent 5-year permit review report. These edits do not change the analysis or conclusions of the Draft EIR.

> The Fink Road Landfill is a Class II and Class III municipal landfill that is permitted to accept general residential, commercial, and industrial refuse for disposal, including municipal solid waste, construction and demolition debris, green materials, agricultural debris, asbestos, and ash. According to ~~CalRecycle~~ the County's 5-year permit review report, the Fink Road Landfill has a maximum permitted throughput of 24,000 tpd and has a total maximum permitted capacity of 14.6 million cubic yards (SCS Engineers 2017). The Fink Road Landfill has a remaining capacity of approximately 8.2 million cubic yards (CalRecycle 2016b).

~~CalRecycle~~ The County previously estimate~~s~~d that the Fink Road Landfill ~~has~~ had a capacity until 2023. However, based on lower disposal rates, the County recently revised its projections for the life of the landfill to ~~2029~~ 2028 for Class III waste and ~~2043~~ 2041 for Class II (~~Stanislaus County 2014~~ SCS Engineers 2017). In addition, the County has initiated plans for an expansion and reconfiguration of the existing facility to extend its useful life by another 10 to 15 years beyond the revised projections (~~Stanislaus County 2009:2-1~~ SCS Engineers 2017). The expansion project would be complete prior to the scheduled original closure date of the landfill.

RESPONSE TO COMMENT 1-4

The commenter states that the Draft EIR refers to "The California Integrated Waste Management Board of 1989," and that it should be "The California Integrated Waste Management Act of 1989."

The following revision has been made on page 3.13-14 in Section 3.13 of the Draft EIR. Please see Chapter 3 of this Final EIR, "Errata." The sentence referenced by the commenter has been revised. This edit does not change the analysis or conclusions of the Draft EIR.

> The California Integrated Waste Management ~~Board~~ Act of 1989 requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills.

RESPONSE TO COMMENT 1-5

The commenter states that the Draft EIR refers to disposal as "generation" so its calculations in this regard are not based upon the desired metrics, which would make its conclusions of waste generation from the area of interest inaccurate.

The following revision has been made on page 3.13-14 in Section 3.13 of the Draft EIR. Please see Chapter 3 of this Final EIR, "Errata." This edit clarifies that the pounds per day per resident reflects a disposal rate and clarifies this rate is required to achieve a 50 percent rate of diversion. This edit does not change the analysis or conclusions of the Draft EIR.

> The California Integrated Waste Management ~~Board~~ Act of 1989 requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills. For 2015, the target solid waste ~~generation~~ disposal rate for ~~Stanislaus County~~ Stanislaus County Regional Solid Waste Planning Agency area is 6.3 pounds per day (ppd) per resident in order to achieve a 50 percent rate of diversion, and the actual measured ~~generation~~ disposal rate was 4.5 ppd per resident, which shows the actual diversion rate was exceeding 50 percent target rate ~~is approximately 1.8 ppd less than the target solid waste generation disposal rate~~ (CalRecycle 2016c).

RESPONSE TO COMMENT 1-6

The commenter states that CalRecycle now uses disposal to estimate 50% diversion.

The comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure.

RESPONSE TO COMMENT 1-7

The commenter states that there is no section 708 of the CALGreen Code and there is no discussion of a requirement for construction contractors to reduce construction waste and demolition debris by 50%. The commenter further states that Chapters 4 and 5 of CALGreen Code require 65% diversion of construction and demolition wastes.

The following revision has been made on page 3.13-21 in Section 3.13 of the Draft EIR. Please see Chapter 3 of this Final EIR, "Errata." These revisions correct the typographical error made in referencing the chapter and section of the CALGreen Code. Section 408 of the CALGreen Code references the requirement for construction contractors to reduce construction waste and demolition debris. These revisions further clarify the diversion and demolition disposal rate is 65 percent. This edit does not change the analysis or conclusions of the Draft EIR.

> Chapter ~~7~~4, Section ~~708~~408, of the 2016 CALGreen Code requires all construction contractors to reduce construction waste and demolition debris by ~~50~~65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both. In addition, the 2016 CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

RESPONSE TO COMMENT 1-8

The commenter states that the Ceres's franchise hauler agreement provides that the hauler "shall provide sufficient bins to allow for the separation of materials to ensure diversion and recycling, if applicable" (in Sec. 34.E.), and states that the "ARRANGER/TRANSPORTER", at a minimum, shall furnish to the City Manager or his/her designee reports verifying: the total number of tons of materials collected on construction/demolition projects and the number of materials and tons separately disposed and recycled at disposal facilities or recycling facilities, if applicable.

The comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure.

RESPONSE TO COMMENT 1-9

The commenter states that CalRecycle does not estimate a waste generation rate and that CalRecycle receives disposal tonnage information from local sources via the Disposal Reporting System.

Please refer to Responses to Comment 1-3 and 1-10.

RESPONSE TO COMMENT 1-10

The commenter states that the Draft EIR refers to disposal as "generation" so its calculations in this regard are not based upon the desired metrics, which may make its conclusions of waste generation from the area of interest inaccurate.

The City's General Plan EIR identifies projected solid waste generation at buildout (City of Ceres 2018a). The City's General Plan EIR determined estimated a residential disposal rate of 0.32 tons per year per person for 2015. The waste disposal rate identified in the Draft EIR (0.002 tons per day or 0.73 tons per year) and used to calculate the tons of disposal per resident per year from development of the Specific Plan is substantially greater than the disposal rate used in the City's General Plan EIR. Therefore, the tons of disposal per year from development of the Specific Plan represent a conservative projection.

RESPONSE TO COMMENT 1-11

The commenter states that CalRecycle does not estimate landfill capacity.

Please refer to Responses to Comments 1-3 and 1-10.

Letter 2

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE DISTRICT 10 DIRECTOR

Making Conservation a California Way of Life.

www.dot.ca.gov

August 9, 2018

10-STA-99-PM 011.74
Whitmore Ranch Specific Plan
DEIR and TIS
SCH #2017012063

Tom Westbrook
City of Ceres

Dear Mr. Westbrook:

The California Department of Transportation appreciates the opportunity to have reviewed the Draft Environmental Impact Report for the Whitmore Ranch Specific Plan. The Specific Plan area is located on 94 acres of land bounded by Whitmore Avenue on the north, Moore Road on the west, and La Rosa Elementary School on the east. The plan would include approximately 441 residential units at completion as well as parks and open space. The Department has the following comments:

- The City should collect impact fees on a fair share basis from this development toward future improvements to SR 99 and the interchanges at Whitmore Road and Mitchell Road. 2-1

- The Department recommends a Complete Streets approach to planning transportation in this development.
    - Facilities such as sidewalks, crosswalks, and bike lanes should be included to provide access between residences and nearby parks, schools, and commercial areas.
    - The Department also recommends bus stops near the development to serve residents.
    - Secure bicycle storage facilities, such as bicycle racks, should also be included at parks, schools, and stores. 2-2

Please contact Nicholas Fung by e-mail
or myself or by email sent to if you have any further
questions.

Sincerely,

TOM DUMAS, CHIEF
Office of Metropolitan Planning

2.2.2 RESPONSE TO COMMENT LETTER 2 – CALIFORNIA DEPARTMENT OF TRANSPORTATION

RESPONSE TO COMMENT 2-1

The commenter states that the City should collect impact fees on a fair share basis from this development toward future improvements to SR 99 and the interchanges at Whitmore Road and Mitchell Road.

The Specific Plan does not have a significant effect or cumulatively considerable effect to State Route 99 or the interchanges at Whitmore Road and Mitchell Road. The project will be subject to paying Public Facilities Fees, which includes funding for a proportionate share of future interchange improvements. Please see Section 3.14, Transportation," and Chapter 5, "Other CEQA," of the Draft EIR. However, the City will continue to coordinate broadly with Caltrans on improvements in the City's Planning Area.

RESPONSE TO COMMENT 2-2

The Department recommends a Complete Streets approach to planning transportation in the Specific Plan. The Department recommends facilities such as sidewalks, crosswalks, and bike lanes, to provide access between residences and nearby parks, schools, and commercial areas; bus stops near development to serve residents; and secure bicycle storage facilities, such as bicycle racks, at parks, schools, and stores.

The City agrees with the commenter with respect to a Complete Streets approach. The City has included related Project Objectives for the Whitmore Ranch Specific Plan (see Section 2.4 on page 2-7 of the Draft EIR):

- Encourage walking, bicycling, and transit use by Specific Plan Area residents, and provide bicycle and pedestrian connectivity throughout the Specific Plan Area and to adjacent bicycle and pedestrian facilities
- Provide safe bicycle and pedestrian connections to and from the two schools within the Specific Plan Area
- Ensure appropriate access and connectivity between the Specific Plan Area and existing developed areas, as well as areas planned for future development

As discussed in Chapter 2, "Project Description," and Section 3.14 of the Draft EIR, the Specific Plan transportation network will provide access and mobility for pedestrians, bicyclists, and motorists, along with future opportunities for planned transit extensions. Planned improvements would include pedestrian and bicycle facilities along Whitmore Avenue and Moore Road, as well as through the central open space feature of the Specific Plan Area. Specific Plan improvements along Whitmore Avenue will be coordinated with a Safe Routes to School project to be constructed south of Whitmore Avenue between Moore Road and the existing schools.

The Specific Plan provides for multi-modal extensions of Lunar Drive and Boothe Road through the Specific Plan Area, as well as a new facility along the southern boundary of the Specific Plan Area (Stanford Avenue). To provide good connectivity and access, several additional internal pedestrian, bicycle, and vehicular facilities would also be installed within the Specific Plan Area. The Specific Plan also includes improvements to circulation that will benefit the Ceres Chavez Junior High School and La Rosa Elementary School.

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Letter 3

LS Lozano Smith
ATTORNEYS AT LAW

Harold M. Freiman
Attorney at Law

August 13, 2018

By U.S. Mail & E-Mail

Tom Westbrook
Director of Community Development
City of Ceres Planning Division

Re: Comments of Ceres Unified School District on
Draft Environmental Impact Report for Whitmore Ranch Specific Plan

Dear Mr. Westbrook:

Our firm represents Ceres Unified School District ("District"). On behalf of the District, we submit these comments on the Draft Environmental Impact Report ("DEIR") prepared for the proposed Whitmore Ranch Specific Plan ("Specific Plan" or "Project"). It is intended that these comments be included as part of the formal administrative record for the Project. As set forth in this letter, the DEIR does not comply with the California Environmental Quality Act ("CEQA," Pub. Resources Code, §§ 21000, *et seq.*) and the CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15000, *et seq.*) for both technical and substantive reasons. Specifically, the DEIR does not include sufficient information related to the potential environmental impacts the Project will have related to an unfinished road, Stanford Avenue, that would otherwise run along the south side of the Project. The DEIR further fails to consider adequate mitigation measures for these and other impacts and contains insufficient feasible project alternatives. Through this letter, the District wishes to emphasize that this Project has the potential to have a significant negative effect on the District's students and staff and to the community as a whole. **We stress that the District's primary concern is the lack of a requirement that Stanford Avenue be extended through to Moore Road, which would mitigate the Project's primary impact identified in this letter.** 3-1

A stated purpose and goal of the Project is to "support growth that improves quality of life for all residents and enhances the qualities of Ceres that residents love" as well as to "integrate transportation and land use to plan for well-connected neighborhoods with safe and convenient vehicle, pedestrian, bicycle, and transit accessibility." (Whitmore Ranch Specific Plan Appendix A, 2.A.; 2.A.12.) As another public agency serving the population of Ceres, the District prefers to cooperate with the City regarding the proposed Project so as to help ensure that it will meet this goal and benefit the entire community, without undue and unmitigated impacts. It remains 3-2

the District's hope that collaboration between the District and both the City and Project developers can occur to address the significant concerns addressed below.

3-2 (cont)

The District requests that the City revise the DEIR to address the serious deficiencies identified in this letter, develop appropriate mitigation measures for impacts that are identified as significant, and then recirculate the revised DEIR as required by CEQA. (Cal. Code Regs., tit. 14, § 15088.5.)

3-3

I. The DEIR does not meet its purpose as an informational document and fails to provide an adequate description of the Project.

The DEIR is deficient for its failure to include an adequate project description. An EIR must include an accurate, stable, and consistent description of the proposed Project. The project description must contain sufficient specific information about the project to allow a complete evaluation and review of its environmental impacts. (Cal. Code Regs., tit. 14, § 15124.) The DEIR fails to incorporate Stanford Avenue into any portion of the Project description, except briefly to mention it in the description of the Project's transportation network, by stating, "[t]he Specific Plan provides for multi-modal extensions of Lunar Drive and Boothe Road through the Specific Plan Area, as well as a new facility along the southern boundary of the Specific Plan Area (Stanford Avenue)." (DEIR, 2-15.) By failing to describe with any specificity what is to be done with Stanford Avenue or what the purpose of this "new facility" is, the City has failed to include an accurate, stable, and consistent description of the proposed project. Without an adequate description, there is insufficient information to allow a complete evaluation and review of impacts related to this portion of the Project, in violation of CEQA. (Public Resources Code § 21061; Cal. Code Regs., tit. 14, § 15121.)

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II. The DEIR does not meet its purposes as an informational document because it fails to provide an adequate analysis of environmental impacts.

The DEIR fails to provide a sufficient and adequate analysis of environmental impacts the Project will have related to an unfinished road, Stanford Avenue, that would otherwise run along the south side of the Project.

A. Traffic and Transportation

The DEIR is inadequate in its discussion of the significant and inevitable traffic and transportation impacts, particularly as related to the Project's construction due to the Project's unfinished southern road, Stanford Avenue.

Within the Specific Plan area there are two existing school sites, La Rosa Elementary and Cesar Chavez Junior High ("School Sites"). The Project proposes approximately 281 new single-family dwelling units and 160 new multi-family dwelling units, which would generate approximately 185 new elementary school students, 55 new middle school students, and 95 new high school students. (DEIR, 3.13-31.) However, the DEIR provides no analysis of the inevitable morning or evening rush hour traffic impacts that will result from parents needing to transport the students generated from the Project to and from schools outside of the Specific Plan area, given that these schools within the Specific Plan area are at capacity and there is no land designated on which to build new

3-5

school facilities within the Specific Plan area. (DEIR, 3.13-31.) Currently, in the District's experience, the intersection leading to the existing schools (Eastgate Boulevard and Whitmore Avenue) is the intersection within the Specific Plan area that is most impacted by traffic. This intersection in fact is the most impacted under existing conditions of any intersection leading to a District school. The District's observations to this effect constitute reliable evidence for consideration for CEQA purposes. (*Arviv Enterprises, Inc. v. South Valley Area Planning Com.* (2002) 101 Cal.App.4th 1333, 1347 ["The relevant personal observations of these residents alone constitutes substantial evidence of environmental impacts. . . . scientific or expert studies are not required to provide substantial evidence to support a fair argument the project may have significant environmental impacts."].) The traffic impact at this intersection will be substantially exacerbated by the Project when the increased number of students generated by the Project causes greater traffic in and out of the schools.

3-5 (cont)

3-6

The Project as described shows only one through road, Whitmore Avenue, which extends to Moore Road. For student drop off, all travel will have to follow that singular route, into the Project on and through Whitmore Avenue to Moore Road, where it will make a right hand turn to exit the Project. This traffic will coincide with all other traffic coming in and out of the Project at the same time, even if not traveling to school, exacerbating the traffic leaving the Project area further causing traffic jams and unsafe conditions. The same pattern will repeat in reverse at the end of the school day. Additionally, Eastgate Boulevard, along the southern border of the two School Sites, is currently a dead end. As a result, traffic to and from the schools have only one point of entry—Whitmore Avenue. The DEIR does not account for these added traffic impacts.

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Similar concerns have been raised by the Stanislaus County Environmental Review Committee (SCERC), which stated in its comment letter to the Notice of Preparation ("NOP"), "[a] full segment of Stanford Avenue from Eastgate Boulevard to Moore Road should be part of the proposed project to help alleviate the increased traffic demand." (SCERC comment letter on the NOP, pg. 1). The District further agrees with the SCERC that this continued segment of Stanford Avenue would "also serve as a secondary east/west access to the junior high and elementary schools and will prevent new shortcut routes through the residential neighborhood." (SCERC comment letter on the Notice of Preparation.)

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The Specific Plan states on 5-1 that, "roadways in the Specific Plan Area are designed to accommodate all modes of travel and balance the efficient movement of vehicular traffic with the provision of safe and easily accessible features for walking, biking, and public transit" and "the Specific Plan circulation system is designed to provide connectivity to distribute traffic within the neighborhood and surrounding area, and avoid focusing too much traffic on any one route." However, the need to transport a greater number of children outside of the Specific Plan area using limited and already congested roadways, such as Whitmore Avenue, provides clear evidence to the contrary.

3-10

The DEIR also must include greater analysis regarding safety issues affected by traffic, such as reduced pedestrian safety. Per the Project as it is described, pedestrians and cyclists currently are only afforded access to the same congested route described above, which would be alongside heavy vehicle traffic. This singular and limited route presents safety concerns, particularly as pupils will be expected to walk to and from the schools that will serve the Project area in increased

3-11

traffic, without adequate and sufficient sidewalks, crosswalk controls, or other pedestrian safety measures.

3-11 (cont)

The DEIR also fails adequately to address how these added traffic impacts will undoubtedly affect response times for emergency services and first responders traveling to the School Sites. The DEIR merely offers a brief conclusory statement that "emergency access impacts would be evaluated as a project-specific level by the City at the time of future development application submittal." (DEIR, 3.14-22.) This is an improper deferral of impact analysis in violation of CEQA, which requires that environmental review occur as early as possible. (*Fullerton Joint Union High School District v. State Board of Education,* (1982) 32 Cal.3d 779 at 797.) In the event of an emergency, Whitmore Avenue is currently the only major road that can be used to access the School Sites. With increased traffic on Whitmore Avenue due to the Project, which the DEIR acknowledges (DEIR, 3.14-23), both the fire and police departments' response times will be affected. This provides a particular concern for the District, which as the DEIR recognizes, is a sensitive receptor (DEIR, 3.11-32) due to its students. The DEIR does not properly account for these impacts. Given these concerns, the DEIR must be revised and supplemented to analyze the significant issues of traffic and safety as they relate to schools.

3-12

The case of *Chawanakee Unified School District v. County of Madera, et al.,* (2011) 196 Cal.App.4th 1016 ("*Chawanakee*") addresses the extent to which a city or county must consider school related impacts in an environmental impact report for new development. As discussed further below, the Court determined that SB 50 does **not** excuse a lead agency from conducting environmental review of school impacts other than an impact "on school facilities." For example:

> [A]n impact on traffic, even if that traffic is near a school facility and related to getting students to and from the facility, is not an impact 'on school facilities' for purposes of Government Code section 65996, subdivision (a). From both a chronological and a molecular view of adverse physical change, the additional students traveling to existing schools will impact the roadways and traffic before they set foot on the school grounds. From a funding perspective, the capped school facilities fee will not be used by a school district to improve intersections affected by the traffic. Thus, it makes little sense to say that the impact on traffic is fully mitigated by the payment of the fee. In summary, ... the impact on traffic is not an impact on school facilities and, as a result, the impact on traffic must be considered in the EIR.

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(Chawanakee, supra, 196 Cal.App.4th at 1028-29.)

Chawanakee supports the conclusion that greater traffic analysis that specifically takes the District and its students into consideration is not only appropriate but required. There is no specific data or discussion of such school trips offered in the DEIR, and there is no way to separate those types of trips from other vehicle trips in the DEIR's analysis so as to meaningfully review and analyze their impacts. The analysis therefore fails to comply with CEQA. (See, Pub. Resources Code, § 21003, subd. (b) [EIR must be meaningful and useful to decision-makers and the public]; Cal. Code Regs., tit. 14, §§ 15140, 15147 [maps, charts and other means of presenting information graphically should be used to enhance an EIR's clarity; technical data should be summarized].)

The District's concerns with the inadequacy of the DEIR's traffic analysis is supported in detail in the attached correspondence from expert traffic engineer Jason Ellard of VRPA Technologies, Inc. The qualifications of both, Jason Ellard and Erik Ruehr, who assisted in VRPA's analysis of the DEIR's traffic discussion, are included along with the letter identifying additional technical faults with the DEIR's traffic analysis. Mr. Ellard's review of the DEIR's traffic analysis and his comments thereon support the District's conclusion that the traffic analysis of the DEIR is inadequate. This again emphasizes the need to revise the DEIR's traffic analysis, take into account the issues noted here and in the attached from the District's expert, and recirculate a legally adequate DEIR. 3-14

B. Public Services and Utilities—Schools Related Impacts

The DEIR states that the "threshold of significance" for impacts on public services, including schools, is as follows:

> If the proposed project would result in 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 services ratios, response times, or other performance objectives 3-15

(DEIR, 3.13-27.)

This standard wholly ignores other potential impacts, such as the traffic effects discussed above, as other bases to find significant impacts related to schools. Moreover, as noted above, the Project proposes approximately 281 new single-family dwelling units and 160 new multi-family dwelling units, which would generate approximately 185 new elementary school students, 55 new middle school students, and 95 new high school students. (DEIR, 3.13-31.) Yet, there is no analysis regarding whether there would be a need for "new or physically altered" school facilities—which there will be, since as the DEIR notes, the District only has one already overcrowded high school, which is outside the Specific Plan area, and will eventually need a new high school facility. (DEIR, 3.13-31.) The District's nearest elementary school, La Rosa Elementary, is also nearing capacity and will not be able to accommodate all students form the Project without adding new facilities. Nor is there any analysis of the impact on the District's ability to continue providing adequate services—which again, there will be if overcrowding results. 3-16

The DEIR also fails to discuss the significant limitations associated with constructing additions or adding portables to the existing School Sites to accommodate students generated by the Project. The DEIR offers only brief conclusory statements, under "Impact 3.13-3," that (1) the "implementation of future projects proposed under the Specific Plan would generate new students in the CUSD"; (2) "La Rosa Elementary School and Central Valley High School would potentially have insufficient capacity to accommodate all anticipated elementary school students and high school students at buildout of the proposed project"; and (3) project applicants would pay State-mandated school impact fees." (DEIR, 3.13-31.) Although the DEIR fails sufficiently to analyze the impacts of the Project under its own standard stated above, an increase in student enrollment constitutes a significant impact. The preparer of an EIR must make a genuine effort to obtain and disseminate information necessary to the understanding of impacts of project implementation. 3-17

(See Cal. Code Regs., tit. 14, § 15151; *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1236.) The DEIR has failed to do so. 3-17 (cont)

This failure adequately to address impacts on schools may be the result of a misconception arising from applicable California law. Section 3.13-32 of the DEIR, notes that "the California Legislature has declared that payment of the State-mandated school impact fee is deemed to be full and adequate mitigation under CEQA (California Government Code section 65996)." (See also DEIR, 3.13-18, 3.13.-31.) In fact, Senate Bill 50, as codified in relevant part in Government Code section 65996, does not relieve a lead agency from analyzing the impact on schools of a proposed project, concluding that there are significant impacts that may remain unmitigated, and further analyzing whether a mitigation measure is available adequately to mitigate the impacts. The proposed Project cannot be approved unless the City either imposes mitigation measures adequate to mitigate identified impacts to a level of less-than-significant or the City adopts an applicable statement of overriding consideration. (Pub. Resources Code § 21002; CEQA Guidelines §§ 15021 (a) (2), 15091 (a) & 15096 (g); see *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App. 3d 30, 41-42 (disapproved on other grounds in *Western States Petroleum Assn. v. Superior Court* (1995) 9 Cal.4th 559).) 3-18

Statutory school impact fees would not sufficiently fund new facilities that will be needed to serve the Specific Plan area. It is commonly understood that "Level 1" school impact fees, which the District has adopted, pursuant to Education Code sections 17620, et seq., covers only approximately one-third of the projected cost of school construction, with the other two-thirds expected to come from State and local bond funds. (California Research Bureau, "*School Facility Financing: A History of the Role of the State Allocation Board and Options for the Distribution of Proposition 1A Funds*" (1999). California Agencies. Paper 302, at p. 15, http://digitalcommons.law.ggu.edu/caldocs_agencies/302.) Although the 2016 passage of Proposition 51 authorized the release of bonds to fund construction and improvement of K-12 school facilities, these bonds are being used to backfill previously-filed applications and are therefore not expected to be available for new construction funding applications by the time the development would be occurring under the Project. Additionally, Government Code section 65996(b) mentions only "school facilities mitigation," meaning that mitigation of impacts on issues other than the adequacy of school facilities must still be addressed. (See *Chawanakee Unified School Dist. v. County of Madera* (2011) 196 Cal.App.4th 1016, 1028, discussed above.) 3-19

The DEIR thus fails as an informational document and fails adequately to analyze impacts on schools. (See Public Resources Code § 21061; Cal. Code Regs., tit. 14, § 15121.)

C. Air Quality

The DEIR is inadequate in its discussion of air quality impacts, particularly as related to the effects these impacts will have on the Project's two adjacent schools, La Rosa Elementary and Cesar Chavez Junior High School ("School Sites"). While the DEIR references sensitive receptors, such as schools and children (see DEIR, 3.3-8), and further details general air quality impacts, it fails to identify specific impacts related to the exposure of children to the emissions of toxic air contaminants that will occur during construction and operation of the Project, and correspondingly fails to mitigate such impacts. For example, the DEIR states that, "if the Specific Plan Area is developed, during construction and operation, there would be an increase in 3-20

the potential for exposure of sensitive land uses (i.e. residential and school uses) to substantial concentrations of TACs (toxic air contaminants)," which is an impact that is "considered potentially significant." (DEIR 3.3-27.)

3-20 (cont)

However, the DEIR fails adequately to discuss these potentially significant impacts as they relate to the children and staff at the adjacent School Sites. Designating land for substantial development that is immediately adjacent to two School Sites is an action deserving of adequate impact analysis on the quality of air and health implications for students and staff at the School Sites. In this regard, the DEIR fails as an informational document that allows for informed decision making. (See Public Resources Code § 21061; Cal. Code Regs., tit. 14, § 15121.)

D. Greenhouse Gas Emissions

The DEIR's analysis of global climate change is flawed throughout for its reliance on the flawed assumptions contained elsewhere in the DEIR. Although the DEIR acknowledges that the Project would result in cumulatively considerable contribution to significant climate change, because the Project would generate short-term construction and long-term operational greenhouse gas emissions (DEIR, 3.7-13), the DEIR fails to account for the added vehicle emissions from gridlocking that will occur as a result of the increased traffic surrounding the Specific Plan Area due to unfinished roads, as discussed above. Moreover, the DEIR fails to analyze these impacts and instead relies on numerous laws and regulations (3.7-4-3.7-10; 3.7-13-3.7-17.) to govern the effects of the emissions and offers minimal mitigation. (DEIR, 3.7-17.) This lack of analysis is unacceptable, particularly since the Project proposes ongoing construction directly adjacent to two School Sites. The DEIR fails both as an informational document and in its analysis of the impacts on global climate change by failing to consider the added vehicle emissions and traffic that will undoubtedly result from encouraging residential growth in an area with already limited transportation routes, including in particular Stanford Avenue.

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E. Hazardous Materials

The DEIR briefly notes both that the Project presents "potential human health hazards from exposure to existing on-site hazardous material" and that as a result of the Project "emission or handling of hazardous or acutely hazardous materials, substances, or waste will occur within one-quarter mile of an existing school." (DEIR, 3.8-21-3.8-22.) However, the DEIR fails to analyze these impacts and instead relies on contractors to "implement and comply with existing hazardous materials regulations," to govern the management of these hazardous materials and offers minimal mitigation. (DEIR, 3.8-21-3.8-23.) This lack of analysis of the actual impacts and failure to address any mitigation measure to offset these impacts is unacceptable, particularly since the Project is proposed in a densely populated residential area adjacent to two School Sites.

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F. Noise and Vibration Impacts

The DEIR notes that noise-sensitive receptors, such as schools, will be exposed to "potentially significant" noise impacts as a result of the Project, but fails to describe the actual impacts with any specificity. (DEIR, 3.11-32.) The DEIR acknowledges that traffic-related noise from the Project will impact existing sensitive receptors, but does not analyze the specific impacts on

3-23

students and staff at the two School Sites. It is likely that both the construction and traffic noise generated from the Project will affect teachers' abilities to teach, monitor, and direct students because they cannot be heard, particularly when students are outdoors or when the windows are open. (Gary Hopkins, "*Have You Heard? Noise Can Affect Learning!*" (July 18, 1997) Education World <http://www.educationworld.com/a_curr/curr011.shtml> [Noise can affect learning – several studies show that noise impacts reading ability and scores].) Additionally, noise and vibrations could affect the very buildings in which students are housed. The DEIR fails to address these concerns and impacts.

3-23 (cont)

III. The DEIR does not adequately mitigate the potentially significant impacts of this Project.

Where potentially significant impacts are identified, CEQA requires that an EIR next "describe feasible measures which could minimize significant adverse impacts." (Cal. Code Regs., tit. 14, § 15126.4.) The DEIR fails to identify sufficient mitigation measures.

The proposed Project cannot be approved unless the City either imposes mitigation measures adequate to mitigate these identified impacts to a level of less-than-significant or the City adopts an applicable statement of overriding consideration. (Pub. Resources Code § 21002; CEQA Guidelines §§ 15021 (a) (2), 15091 (a), 15093 (b) &15096 (g); see *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41-42 (disapproved on other grounds in *Western States Petroleum Assn. v. Superior Court* (1995) 9 Cal.4th 559) ["A public agency can approve a project with significant environmental impacts only if it finds such effects can be mitigated or concludes that unavoidable impacts are acceptable because of overriding concerns"].)

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Public Resources Code section 21002 states that, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects…." This section also states that "in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects." Thus, before adopting an applicable statement of overriding considerations, the City must have identified and eliminated, based on specific economic, social or other conditions, all reasonably feasible alternatives. The City has not identified all or even a reasonable number of feasible mitigation measures to address identified impacts or additional impacts that should have been identified. As a result, the DEIR is noncompliant with CEQA.

A. Traffic and Transportation

The DEIR concedes that the overall traffic impacts, particularly related to Whitmore Avenue, that will result from the Project are "potentially significant." (DEIR, 3.14-16.) The DEIR offers inadequate and insufficient mitigation to address these traffic impacts.

3-25

Without any analysis, the DEIR determines that "the Specific Plan Area would cause daily traffic on Whitmore Avenue to increase by 5 percent (i.e., 916 vehicles per day) when roughly 44 percent of the Specific Plan residences are occupied." (DEIR, 3.14-17.) Therefore, the DEIR concludes that mitigation, such as the expansion of Whitmore Avenue, will be implemented between when the Project development begins and before 44 percent of the dwelling units are occupied within the

Specific Plan Area. Similarly, the DEIR briefly concludes that "emergency access impacts would be evaluated at a project-specific level by the City at the time of future development application submittal." (DEIR, 3.14-22.)

As with the improper deferral of impact analysis, these statements constitute a deferral of mitigation, which is inappropriate as the EIR has not identified any reason for which the mitigation must be deferred or is not currently feasible. If mitigation is feasible but impractical at the time of CEQA review, it is sufficient to articulate specific performance criteria and make further approvals contingent on finding a way to meet them. This topic has been the subject of recent appellate decisions, including *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, which disapproved an EIR based on the fact that it improperly deferred mitigation of impacts to an endangered butterfly and did not include any performance standards or guidelines. Further, the EIR did not indicate that it was in any way impractical or infeasible to specify standards or guidelines. The DEIR fails in the same way here.

Deferral of the specifics is acceptable only if the agency commits itself to mitigation and lists the alternatives to be considered, analyzed and possibly incorporated in the mitigation plan. (See *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260.) The DEIR offers no such alternatives, which could include the extension of Stanford Avenue. The DEIR itself recognizes the need for the completion of Stanford Avenue, but asks that the "completion of Stanford Avenue from Moore Road to Eastgate Boulevard along the south side of the Specific Plan Area" be "*assumed*" as a local area improvement "although specific funding mechanisms are not in place." (DEIR, 5-30, emphasis added.) This statement is thoroughly inadequate as mitigation because it does not commit the City to any action, and does create a condition of approval for developers. Mitigation measures are required to be enforceable through conditions of approval, contracts or other means that are legally binding. (Pub. Resources Code, §21081.6, subd. (b); Cal. Code Regs., tit. 14, § 15126.4, subd. (a)(2).) The DEIR's conclusion in this regard is akin to saying "you have a brain tumor, so for purposes of this analysis, we assume it has been cured." Such logic cannot prevail.

3-25 (cont)

B. Public Services and Utilities—Schools Related Impacts

The DEIR fails to explore mitigation measures that would alleviate the impact of the increases in student enrollment discussed above. Despite the DEIR's conclusion that the "California Legislature has declared that the school impact fee is deemed to be full and adequate mitigation under CEQA," (DEIR, 3.13-31) Government Code section 65996 does not preclude a host of other available means of addressing a School District's needs as a result of new development. Alternative means of addressing the impacts of new development on schools still allowed under Senate Bill 50 include:

3-26

1. Coordinated Planning for School Sites

Government Code sections 65352 and 65352.2 require local cities to coordinate planning of school facilities with school districts. The Legislature confirmed in this statutory scheme that the parties are meant to coordinate "[o]ptions for the siting of new schools and whether or not the local city or counties existing land use element appropriately reflects the demand for public school facilities, and ensures that new planned development reserves location for public schools in the most

appropriate locations." (Gov. Code 65352.2(d)(2).) The City has made no meaningful effort to coordinate with the District and has failed to address this requirement in the DEIR. The fact that new school sites will inevitably be needed, given the DEIR's recognition that the current school facilities are at capacity and have no room for expansion, is not speculative and this impact must be adequately addressed. Failure to do so constitutes an improper delegation of CEQA analysis to an unrelated entity (the District) and improper deferral of CEQA analysis. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260.)

The Legislature recognized that new planned development should take into consideration and even "reserve" where schools would be located to serve the development because schools are as integral a part of planning for new development as is any other public service, such as fire, police, water and sewer. As it relates to this instance, the intent behind sections 65350, *et seq.*, supports the District's position that the City must analyze whether the current actual capacity of District schools is adequate to accommodate both the existing population and the new development that will result from the Project. The City can help the District provide adequate facilities required to offset the impact of the Project, which are not sufficiently addressed by developer fees, by acknowledging the significant impact on schools, and requiring alternative mitigation measures to assure that there is an adequate site to accommodate school facilities if and when needed. Instead, the DEIR improperly concludes that developer fees are sufficient and no further mitigation—and for that matter no further analysis—is needed. (DEIR, 3.13-32.)

3-26 (cont)

2. Land Dedication

One possible mitigation method, which was not addressed in the DEIR, would be for the City to consider adopting findings requiring any developer building as part of the development allowed by the Project to dedicate land and/or funding pursuant to Government Code sections 65970, *et seq.*, which permit the City to require a developer to dedicate land to a School District.

Section 65974 specifically states that "for the purpose of establishing an interim method of providing classroom facilities where overcrowded conditions exist, . . . a city, county, or city and county may, by ordinance, require the dedication of land, the payment of fees in lieu thereof, or a combination of both, for classroom and related facilities for elementary or high schools as a condition to the approval of a residential development." Nothing in Senate Bill 50/Government Code section 65996 precludes this approach. Land dedication is a permissible mitigation measure under Government Code sections 65995, et *seq.* Section 65995(a) specifically states that "[e]xcept for a fee, charge, dedication, or other requirement authorized under Section 17620 of the Education Code, or pursuant to Chapter 4.7 (commencing with Section 65970), a fee, charge, dedication or other requirement for the construction or reconstruction of school facilities may not be levied. . . ." (Emphasis added.) Section 65995 expressly excludes Chapter 4.7, inclusive of section 65974, from this limitation, thus permitting a city to address conditions of overcrowding in school facilities or inadequately sized school sites by requiring, for example, the dedication of land.

3-27

Further, the City is authorized by section 66478 of the Subdivision Map Act to require dedication of elementary school sites when needed to address development. Nothing in Government Code sections 65995, *et seq.*, precludes such a requirement.

A land dedication requirement would be good public planning benefiting all residents of the community, including future residents of the Project. Under Government Code sections 65352 and 65352.2, the City has a duty to help plan for adequate services to its residents by ensuring that future sites are set aside for schools. Failure to do so leads to inadequate services, future controversies, and the potential need for a school district to exercise its rights under eminent domain, displacing existing residents. Therefore, mitigation for the impacts stemming from the Project that are not considered in the DEIR is and can be made available as mitigation even after Senate Bill 50. 3-27 (cont)

3. Phasing

Another method by which the City can work cooperatively with the District within all legal constraints to ensure adequate school facilities with regard to new development allowed by the Project, and which therefore can serve as an appropriate mitigation measure, is the requirement that all future development be phased. Timing development so as to balance the availability of school facilities with new development can significantly aid the School District in its attempt to provide for the additional students who will be generated as a result of the Project and development following approval of the Project. Such phasing is not a denial of new development on the basis of insufficient school facilities in contravention to SB 50; it is instead appropriate planning to offset the impacts of new development. 3-28

The DEIR fails to consider any of these potential mitigation options and therefore fails to adequately consider and mitigate the impacts of this Project on schools.

C. Air Quality

The DEIR concedes that during development and operation of the Project, "there would be an increase in the potential for exposure to sensitive land uses to substantial concentrations of toxic air contaminants. The DEIR further acknowledges this as a "potentially significant" impact. (DEIR, 3.3-27.) The DEIR's only proposed mitigation measure is to require site developers and project applicants to "construct all facilities using current phase construction equipment (currently Tier 4) to reduce exposure of sensitive receptors to any toxic air contaminants." (DEIR, 3.3-29.) This measure lacks either specificity or analysis as to its effectiveness. Additional reasonable mitigation measures the DEIR fails to consider include: requiring site developers and project applicants to extend Stanford Avenue so as to alleviate traffic congestion and offer more space for construction equipment to be further away from the School Sites; construction of a sound wall between the School Sites and the Project; installation of double pane windows at the School Sites; or installation of updated HVAC systems throughout the School Sites. Each of these measures would at least limit student exposure to poor air quality and should be a prerequisite to any development that occurs on the Specific Plan area, immediately adjacent to the School Sites. Such measures would properly be imposed on the Project applicant, as the DEIR cannot delegate mitigation responsibility to other agencies, including the District. (Cal. Code Regs., tit. 14, § 15025, subd. (b)(1).) 3-29 3-30 3-31 3-32 3-33

D. Greenhouse Gas Emissions

The DEIR concedes that the Project would result in cumulatively considerable contribution to significant climate change, because the Project would generate short-term construction and long-term operational greenhouse gas emissions (DEIR, 3.7-13). The DEIR proposes to reduce such impacts by requiring contractors for the Project to use electric and renewable fuel powered equipment, where commercially available. (DEIR, 3.7-17.) The DEIR then admits that such mitigation is insufficient and acknowledges that "the City cannot at this time guarantee the success of this mitigation measure" and therefore, "the impact is considered significant and unavoidable." The DEIR fails to consider any other potential mitigation measures and instead relies on numerous laws and regulations (3.7-4-3.7-10; 3.7-13-3.7-17.) to mitigate these greenhouse emission impacts, yet none of these laws and regulations specifically address the greenhouse emission impacts to the School Sites, nor is there analysis of how these laws and regulations will work to reduce impacts to a level of less than significant. This analysis is again insufficient under CEQA. 3-34

E. Hazardous Materials

After acknowledging that the Project will result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste impact at a significant level, the DEIR improperly delegates the responsibility of mitigation of these impacts to Project contractors by requiring them to comply with standard laws and regulations related to the handling of hazardous substances and materials, which they should already be in compliance with, regardless of the DEIR requirement. (DEIR, 3.8-21, 3.8-22.)

The DEIR likewise acknowledges that emissions or handling of hazardous or acutely hazardous materials, substances, or waste will occur within one-quarter mile of the two existing School Sites, but then concludes that such impacts are less than significant, again because contractors will be "required to implement and comply with existing hazardous materials regulations. . ." (DEIR, 3.8-22.) 3-35

The DEIR fails to analyze the effectiveness of these measures, and also fails to consider several feasible mitigation measures, including: placement of setbacks between the School Site and the Project; installation of double pane windows at the School Site; installation of updated HVAC systems throughout the School Sites; or restriction on deliveries, pickups, and use of heavy machinery at the Project during drop-off and pick-up times for students at the School Sites. Each of these measures would at least limit the exposure of students to hazardous materials and should be a prerequisite to the Project, which is adjacent to the School Sites. Such measures should not be left unilaterally for the District to carry out; mitigation measures should not be imposed on the very entities that are being impacted by the Project. Rather, these are mitigation measures that are appropriately imposed on the Project proponents.

F. Noise and Vibration

The DEIR considers the Project's impact of temporary, short-term construction activities, exposing existing off- and future on-site sensitive receptors to elevated noise levels, to be significant. The DEIR then proposes minimal mitigation to this impact, including limiting 3-36

construction activities to daytime hours and the use of mufflers, but ultimately concludes that there is "no additional feasible mitigation to avoid or reduce this impact to a less-than-significant level" leaving the impact "significant and unavoidable." (DEIR, 3.11-27.) The DEIR fails to consider any additional potential mitigation measures, which is of great concern considering the inevitable noise impacts to the School Sites. This analysis is again insufficient under CEQA. 3-36 (cont)

IV. The DEIR Fails to Analyze a Reasonable Range of Alternatives

CEQA requires that an EIR identify and discuss alternatives to the Project. (Pub. Resources Code, §§ 21002, 21002.1(a), 21100(b)(4), 21150.) This requirement stems from the fundamental statutory policy that public agencies should require the implementation of feasible alternatives or feasible mitigation measures to reduce a project's significant environment impacts. (Pub. Resources Code, § 21002.) According to the CEQA Guidelines, an EIR must describe a reasonable range of alternatives to the proposed project, or to its location, that would feasibly attain most of the project's basic objectives while reducing or avoiding any of its significant environmental effects. (Cal. Code Regs., tit. 14, § 15126.6(a).) The EIR must explain how the project alternatives were selected for analysis, and also identify alternatives rejected as infeasible and explain why they were rejected. (Cal. Code Regs., tit. 14, § 15156.6(c).) The DEIR is insufficient because it does not meet these requirements.

The Draft EIR considered only three alternatives to the Project: No Project Alternative; Revised Site Plan Alternative to Reduce Transportation, Noise, and Greenhouse Gas Emissions Impacts; and Revised Site Plan Alternative to Protect Existing Trees. Noticeably missing from the list is any alternative that would require developers to extend Stanford Avenue or otherwise to address Transportation and Noise impacts or an alternative proposing a lower density Project, which would reduce traffic impacts. There is no analysis or reasoning provided as to why such alternatives were not considered or analyzed. A similarly-flawed EIR was invalidated in *Watsonville Pilots Association v. City of Watsonville* (2010) 183 Cal.App.4th 1059. In that case, the EIR for a new city general plan included two alternatives with the same level of increased development as the proposed project but did not consider any reduced development alternatives. (*Id.* at 1087.) The Court recognized that the project's environmental impacts would flow largely from growth, and therefore concluded that the EIR was fatally flawed because it did not include a reduced development alternative that would provide information about how most project objectives could be satisfied without the level of environmental impacts that would result from the project. (*Id.*) Similarly, the DEIR here fails because it deprives the public and the decision-makers of the necessary information in order to make an informed decision. The City's decision-makers have no way of determining whether or not an option involving the extension of Stanford Avenue or an alternative proposing lower density could avoid or lessen the impacts of the Project while still meeting the Project's objectives. As a result, the Draft EIR fails to comply with CEQA and must be revised and recirculated. 3-37

V. The DEIR is Inconsistent with the City's Adopted General Plan, and Fails to Address Such Inconsistency.

CEQA requires an EIR to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans. (Cal. Code Regs., tit. 14, § 15125(d).) An "applicable" plan is one that has already been adopted and thus legally applies to 3-38

the project. (*Chaparral Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1145.) The purpose of the required analysis is to identify the inconsistencies that the lead agency should address. By doing so, the lead agency may be able to modify the project to avoid any such inconsistencies. (See *Orinda Association v. Board of Supervisors* (1986) 182 Cal.App.3d 1145, 1169.) Though the DEIR acknowledges the City of Ceres 2035 General Plan ("General Plan"), it fails to satisfy these requirements because it does not adequately consider consistency with the proposed General Plan.

Several of the proposed plans in the DEIR directly conflict with the General Plan. For example, the General Plan's Vision Statement and Guiding Principles include the following goals:

- Support growth that improves quality of life for all residents and enhances the qualities of Ceres that residents love. (Goal 2.A.)
    - Integrate transportation and land use to plan for well-connected neighborhoods with safe and convenient vehicle, pedestrian, bicycle, and transit accessibility. (Goal 2.A.12.)
- Provide for the long-range planning, development, and maintenance of the city's roadway system to ensure the safe and efficient movement of people and goods through a variety of travel modes. (Goal 3.A.)
- Maintain acceptable multi-modal travel flow along Ceres' major corridors. (Goal 3.B.)
- Protect residential areas from high-volume and high-speed traffic and its effects and promote bicycling and walking on residential streets. (Goal 3.C.)
    - Consider the effects of new development on local streets in residential areas and require new development to mitigate significant impacts to existing residential neighborhoods. (Goal 3.C.I.)
- Promote provision of safe and efficient transit service to reduce congestion, improve the environment, and provide viable non-automotive means of transportation within and connecting to Ceres. (Goal 3.E.)
- Provide for education needs for all Ceres residents, ensuring that adequate school facilities are available and appropriately located. (Goal 6.A.)

(General Plan Goals and Policies, Appendix A.) The DEIR's failure to include and analyze sufficient information related to the potential environmental impacts the Project will have related to traffic flow, particularly out of the Project area to and from the School Sites, and further, due to an unfinished road, Stanford Avenue, is at odds with these principles, because it will have a direct negative impact on the City itself, particularly with the expected traffic impacts, and on the adjacent School Sites. This inconsistency and relating impacts must be addressed in the DEIR. The DEIR's deficient analysis of these issues leads to an incorrect conclusion that the DEIR is

3-38
(cont)

consistent with the General Plan goals and policies, in violation of CEQA. (Cal. Code Regs., tit. 14, § 15125(d).)

3-38 (cont)

VI. Conclusion

The DEIR does not adequately analyze the Project's potential impacts, and must address with greater specificity the effects of these impacts on school facilities and services, student safety, traffic and more, as addressed in this letter. The DEIR likewise fails to propose adequate mitigation measures or reasonable alternatives to address these impacts. The DEIR also fails to acknowledge and assess the many inconsistencies between the Project and the General Plan. The District encourages the City and Project proponents to work cooperatively with the District and consider mitigation measures and Project alternatives that can assist in adequately mitigating the impacts on the District's schools and the affected surrounding environment. The District stands ready to continue meeting and working with the City and the Project developer to address these vital issues.

3-39

Sincerely,

LOZANO SMITH

Harold M. Freiman

HMF/gc

Enclosure

cc: Scott Siegel, Superintendent, Ceres Unified School District
Dan Pangrazio, Assistant Superintendent, Business Services, Ceres Unified School District

Transportation Planning - Traffic Engineering - Environmental Assessment
Sustainable Communities Planning - Public Outreach

VRPA TECHNOLOGIES, INC.

August 10, 2018

Linda Davis, Purchasing & Contract Specialist
Ceres Unified School District

Re: Review of the Traffic Impact Analysis for Whitmore Ranch Specific Plan

Dear Ms. Davis,

VRPA Technologies, Inc. (VRPA) has reviewed the Traffic Impact Analysis for Whitmore Ranch Specific Plan (Project). The Project will guide development of approximately 94 acres of residential and public uses on property that is located south of Whitmore Avenue between the TID Ceres Main Canal and La Rosa Elementary School in the City of Ceres. We have the following comments:

1. Table 1 (Level of Service Definitions) on page 9 of the Traffic Impact Analysis identifies the 2000 Highway Capacity Manual (HCM) as the source of the data included in the table. Table 1 should reflect the 2010 HCM to be consistent with the City of Ceres General Plan 2035. 3-40

2. Page 9 of the Traffic Impact Analysis indicates that the level of service on individual roadway segments was determined based on daily traffic volume thresholds identified in the City of Ceres General Plan Update Existing Conditions report. The City of Ceres General Plan Update Existing Conditions report identifies the 2010 HCM as the source of the data in the table (Table B-I). It should be noted that Table B-I only includes the Hourly Capacity and Daily Capacity of various types of roadway segments. However, Table 2 (Roadway Segment Level of Service Thresholds) of the Traffic Impact Analysis for the Project includes daily volume thresholds for level of service A-E which correspond with various volume to capacity (V/C) ratios. The Traffic Impact Analysis should be revised to indicate the source of the level of service thresholds for level of service A – D since it is unclear in the Traffic Impact Analysis and Draft Environmental Impact Report (DEIR) how these thresholds were determined. Application of unsubstantiated level of service thresholds will produce invalid level of service results for study roadway segments. 3-41

3. Page 16 of the Traffic Impact Analysis indicates that development of the Project will be accompanied by portions of a new east-west secondary collector street (Stanford Avenue) that will connect to Moore Road and extend to Eastgate Boulevard. Considering the trip distribution for the Project and the assignment of Project trips to study intersections, an analysis of the impacts related to the connection of Stanford Avenue and Eastgate Boulevard was not conducted. The Traffic Impact Analysis does not identify the impacts to existing school traffic/students along Eastgate Boulevard once Stanford Avenue connects with Eastgate Boulevard. It's plausible that residential traffic from the Project will use Eastgate Boulevard to enter/exit the development. 3-42

Exhibit 2-6 (Conceptual Site Plan) shows that Stanford Avenue will serve as a local road to the residential development. In addition, Stanford Avenue is not listed in the recently update City of Ceres General Plan Update. However, page 43 of the Traffic Impact Analysis states that the City of Ceres indicated that the completion of Stanford Avenue from Moore Avenue to Eastgate Boulevard along the south side of the Project should be assumed even though specific funding mechanisms aren't in place. The Traffic Impact Analysis and DEIR do not identify the funding source or the entity responsible for the development of the Stanford Avenue and Eastgate Boulevard connection. The Traffic Impact Analysis also indicates that the extension of Eastgate Boulevard from the current terminus across Roeding Road to Service Road should be assumed in addition to the improvement discussed above. None of these improvements are included in the City of Ceres Transportation Fee (PFF) Projects and should be analyzed to determine impacts to surrounding land uses including the Cesar Chavez Junior High School and La Rosa Elementary School. 3-43

The Traffic Impact Analysis should be revised to incorporate a mitigation measure that includes the analysis of traffic impacts associated with the Stanford Avenue/Eastgate Boulevard connection and Eastgate Boulevard extension in relation to school traffic and students/pedestrians from Cesar Chavez Junior High School and La Rosa Elementary School given the presence of over 1200 students. 3-44

4. Page 16/17 of the Traffic Impact Analysis indicates that the distribution of project trips was determined from review of existing local traffic patterns as well as consideration of traffic patterns suggested by the City of Ceres General Plan Update traffic model and that the distribution pattern identified in the school's EIR was assumed. The trip distribution or travel patterns of residential land uses are generally different than the trip distribution or travel patterns of public schools. A 'Select Zone Run' prepared by Stanislaus Council of Governments (StanCOG) would substantiate trip distribution or travel patterns of residential land uses within the Project area. The Traffic Impact Analysis should be revised to include a 'Select Zone Run' for purposes of identifying the trip distribution of the Project. 3-45

5. All of the trip distribution percentages in Figure 4 (Project Trip Distribution) of the Traffic Impact Analysis don't correspond with the locations/values identified in Table 7 of the study. 3-46

6. An analysis of PM peak hour trips was not completed for study intersections 10 and 11. The Traffic Impact Analysis should be revised to include the analysis of PM peak hour trips at study intersections 10 and 11. 3-47

7. The AM peak hour Project trips (Figure 5) don't balance between study intersections 11, 12, and 13. The Traffic Impact Analysis should be revised to address the imbalance of AM peak hour Project trips at intersections 11, 12, and 13. 3-48

Based on our review of the Traffic Impact Analysis and DEIR section, we recommend that the analysis be revised to address methodological errors, as well as disclose the methodology used to develop the trip distribution of future volumes. In addition, the analysis of impacts associated with the Stanford Avenue and Eastgate Boulevard connection is absent from the Traffic Impact Analysis and DEIR. For the reasons stated above, the Traffic Impact Analysis of the DEIR appears to be inadequate. 3-49

Should you have any questions, feel free to contact me via one of the following

Sincerely,

Jason Ellard, Transportation Engineer
VRPA Technologies, Inc.

VRPA Technologies, Inc. - Firm Overview

VRPA Technologies, Inc. uniquely combines engineering expertise and professionalism with creative thinking and innovative problem solving. The result is an extraordinary transportation engineering and planning firm that possesses the essential expertise as well as the ability to look across disciplinary boundaries for solutions others may overlook. This innovative approach is evident by the expanse of services available to VRPA Technologies diverse clientele, which includes both the public and private sectors consisting of state governments, regional agencies, counties and cities, as well as private planning/engineering firms. Each client receives what VRPA Technologies is known for...on time, on target, on budget professional service.

VRPA Technologies, Inc. offers comprehensive consulting services throughout the State of California, other Western States, and the East Coast. Specialized fields of service include transportation planning/modeling, circulation and traffic engineering analysis, transportation demand and systems management, infrastructure financial planning, Intelligent Transportation Systems (ITS) planning and integration, as well as mass transportation, bicycle, non-motorized, and aviation planning and design. Furthermore, VRPA Technologies, Inc. has extensive experience in public outreach, land use modeling, regional housing needs assessment, environmental analysis, and air quality and noise planning and modeling. VRPA has been very successful with development of complicated and controversial transportation projects because we also handle the public outreach components for those same projects with well-seasoned staff from around the State. In a position to utilize this broad experience base is an energetic staff equipped with the necessary tools and "can do" attitude to ensure a successful outcome to every challenge undertaken.

VRPA Technologies, Inc. is always committed to providing continuous and direct consulting services to its clients and understands that the ability to respond to the immediate needs of its clients is often the key to a successful client/consultant relationship, resulting in viable projects of high quality.

Georgiena Vivian, President/Principal, founded VRPA Technologies, Inc. in 1988. Under Ms. Vivian's leadership, the firm has completed over 1,000 successful transportation planning/modeling, environmental, air quality planning, engineering and Intelligent Transportation Systems (ITS) projects.

VRPA Technologies is a registered Disadvantaged Business Enterprise (DBE) under the California Unified Certification Program, certified as a Women Business Enterprise (WBE), qualifying as an Under Utilized Disadvantaged Business Enterprise (UDBE), and is also a State of California Small Business/Microbusiness.

Consulting Services Offered

Transportation Planning

- Transit Planning and Design
- Transportation and Land Use Integration Plans
- Parking Studies
- Transportation Surveys and Analysis
- Long-Range Transit Plans
- Circulation Elements

Traffic Engineering

- Preparation of Traffic Impact Studies & Assessments
- Level of Service Analysis
- Congestion Management Programs
- Intelligent Transportation Systems
- Traffic Signal Timing and Design
- Bus Rapid Transit Planning and Design

Environmental Assessment

- Environmental documents for transportation projects (all modes)
- Greenhouse gas emission modeling and assessment for environmental documents

Public Outreach

- Public outreach and education programs for transportation projects

Jason Ellard

Transportation Engineer

Professional Summary

Jason Ellard, Mr. Ellard has over 14 years of traffic engineering experience. Mr. Ellard specializes in traffic impact and circulation assessments and has completed numerous impact assessments in the cities of Fresno, Madera, Bakersfield, Shafter, and Indian Wells, and Fresno, Tulare, Madera, Riverside, San Joaquin, and Kern Counties. Mr. Ellard was instrumental in the completion of the traffic impact study for the Riverbend Sand & Gravel Development and the Vulcan Materials Centerville expansion, both located in Fresno County. Mr. Ellard was also instrumental in the completion of traffic impact studies for the Orosi Rock Surface Mining Operation Amendment, and Vulcan Materials' Austin Quarry and Ashlan Avenue Asphalt Batch Plant Projects. Mr. Ellard is currently leading efforts to prepare traffic, air, and noise impact assessments throughout the San Joaquin Valley and in Riverside and San Diego Counties for new development and new transportation projects and studies.

Project Experience

- **Madera County Transportation Commission (MCTC) Regional Transportation Plans/Sustainable Communities Strategy (RTP/SCS), Measure T Sales Tax Measure Plan, and Associated Environmental Impact Reports (EIRs):** Assisted and/or led development of the 2011 through 2018 RTPs, SCS, and EIR documents; developed the 2006 Measure T Investment Plan and EIR, as well as the Measure T Strategic Implementation Plan. Documents prepared conformed to regional State and federal transportation, air quality, GHG, noise and traffic requirements; SCS, and CEQA requirements and guidance. Assisted with development of prioritization criteria and methodologies for all modes of transportation and led the public involvement process and Steering Committee meetings.

- **Tesoro Viejo Internal Plan Area Traffic Impact Study and Additional Traffic Analysis (State Route 41 Impacts):** Involved in various transportation planning analyses related to the Tesoro Viejo master planned community since 2005; recent work activities related to the circulation system internal to the project site. Analyzing estimated project trip generation and distribution on internal street system and making recommendations on intersection geometrics, turn pocket storage lengths, and number of lanes needed on roadway segments. Analyzing project impacts at several intersections along State Route 41 for interim scenarios to determine needed mitigation measures prior to construction of freeway alignment.

- **Gunner Ranch West Traffic Impacts Study:** VRPA Technologies was responsible for preparing the Traffic Impact Study (TIS) for the Gunner Ranch West Development, which is a mixed-use development that includes residential, commercial, office, and medical uses. The Addendum TIS was prepared for the purpose of augmenting the TIS and included an analysis of impacts associated with student-related project trips assuming that all students generated by the development attended schools outside of the project boundaries. The Supplemental TIS included an analysis of Existing Plus Project conditions for the purpose of identifying direct project impacts.

- **City of Madera Love's Travel Center Traffic Impacts Study:** VRPA was responsible for the development of the Traffic Impact Study for the City of Madera Love's Travel Center Project. The Project is located in the city of Madera, near the northern edge of the city limits, at the Avenue 17/State Route 99 (SR 99) interchange. The Project site, encompassing approximately 50 acres, contains one parcel (Assessor's Parcel Number 013-240-

003). However, only approximately one-half, or about 25 acres, are proposed to be developed as part of the Travel Center; the remainder of the parcel will be separated from the Travel Center site through a tentative subdivision map. In addition, a street right-of-way dedication for Sharon Boulevard measuring 5.1 acres is proposed. The Project components include a Travel Center, Restaurant, Tire Care Center, Hotel, and RV/Boat/Self storage.

- **Austin Quarry Traffic Impact Study:** VRPA was responsible for the development of the Traffic Impact Study for the Vulcan Materials Company Austin Quarry which includes mining activities on approximately 356 +/- acres of open grazing land southwest of the intersection of State Route (SR) 41 and SR 145 in the County of Madera. The Project site is located on 671 acres in an unincorporated area of Madera County, approximately 12 miles east of the City of Madera and 8 miles north of the City of Fresno. The Project site is located within three contiguous parcels and is comprised of a 348-acre area encompassing the quarry, plant site, entrance road and berms; and 323 acres of grasslands, natural drainage channels, and wetlands that would not be disturbed by Project-related activities. The Madera Canal forms the southern and southwestern boundary of the property and SR 145 delineates the northern boundary. The eastern boundary of the property runs parallel to, and approximately 0.1 miles west of, SR-41.

- **Fresno Council of Governments Regional Transportation Plan (RTP), Measure C Sales Tax Measure Plan, and Associated RTP/SCS and Measure C Expenditure Plan Environmental Impact Reports (EIRs):** Assisted and/or led development of the 2011 through 2018 RTPs and/or associated EIR documents; assisted with development the 2006 Measure C Expenditure Plan and EIR, as well as Measure C Handbooks and the Implementation Plan. Focused on preparation of the air, noise and traffic impact assessments in accordance with CEQA. Documents prepared conformed to regional State and federal transportation, air quality requirements; SCS, and CEQA requirements/guidance.

- **Goshen Transportation and Community Plan:** As the lead firm, developed the Transportation and Community Plan (Plan) for the community of Goshen; utilized a collaborative approach to address pedestrian and transportation deficiencies; explored options to improve pedestrian and traffic safety, evaluated impacts of major transportation projects, and determined appropriate land use patterns; led community outreach, visioning and solution process; conducted two stakeholder meetings, a community survey and three community workshops.

- **Old Fig Garden Transportation and Land Use Study:** Defined appropriate transitions from the established residential neighborhoods to adjacent City and State transportation corridors; developed transportation and outreach components including traffic calming, safe routes to school, bike and walking trail planning, and traffic issues associated with Christmas Tree Lane; completed existing and future year traffic analysis, Christmas Tree Lane attendee survey; stakeholder interviews; and initial outreach workshop

- **Hanford Downtown East Precise Plan:** Assisted in the facilitation of a design charrette to present land use, bike and pedestrian facilities, traffic calming, and transit standard alternatives and accompanying streetscape design concepts; prepared traffic impact analysis supporting the preparation of the Hanford Precise Plan and the environmental impact report for the Plan; traffic impact analysis prepared to meet the requirements of the City of Hanford as well as the California Environmental Quality Act.

Professional Qualifications

Education

California State University, Fresno 2000-2005, Bachelor of Science in Engineering (Civil Engineering)

Erik O. Ruehr, P.E.

Director of Traffic Engineering

Professional Summary

Erik Ruehr, Director of Traffic Engineering with VRPA Technologies, Inc., has over thirty years of experience in traffic engineering and transportation planning. Prior to joining VRPA, Mr. Ruehr worked with JHK & Associates, BRW, and the Toledo Metropolitan Area Council of Governments. Mr. Ruehr' experience covers a broad range of traffic engineering and transportation planning specialties. He has extensive experience in the preparation of traffic forecasts for regional transportation plans, corridor studies, and traffic impact analyses and has applied traffic forecasts in a variety of planning, operational, and design projects. Mr. Ruehr' traffic engineering experience includes Intelligent Transportation Systems, traffic signal systems, traffic engineering design, traffic signal timing, and parking. He is a registered as a Civil Engineer and Traffic Engineer in California and as a Professional Engineer in Washington, Oregon, Minnesota, and Florida. Mr. Ruehr has served with the Transportation Research Board's Highway Capacity Committee and has contributed to the 2000 and 2010 versions of the Highway Capacity Manual. Currently, Mr. Ruehr is leading the Institute of the Transportation Engineers (ITE) as the Chair of the California SB 743 Task Force. Under Mr. Ruehr' leadership, the statewide task force is to keep California ITE member informed of the SB 743 legislation and to work with the California Governor's Office of Planning and Research (OPR) to create effective SB 743 guidelines that will support the goals of SB 743 while making the most efficient use of available tools and resources.

Project Experience

- **Madera County Transportation Commission (MCTC) Regional Transportation Plans/Sustainable Communities Strategy (RTP/SCS), Measure T Sales Tax Measure Plan, and Associated Environmental Impact Reports (EIRs):** Assisted and/or led development of the 2011 through 2018 RTPs, SCS, and EIR documents; developed the 2006 Measure T Investment Plan and EIR, as well as the Measure T Strategic Implementation Plan. Documents prepared conformed to regional State and federal transportation, air quality, GHG, noise and traffic requirements; SCS, and CEQA requirements and guidance. Assisted with development of prioritization criteria and methodologies for all modes of transportation and led the public involvement process and Steering Committee meetings.

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road and berms; and 323 acres of grasslands, natural drainage channels, and wetlands that would not be disturbed by Project-related activities. The Madera Canal forms the southern and southwestern boundary of the property and SR 145 delineates the northern boundary. The eastern boundary of the property runs parallel to, and approximately 0.1 miles west of, SR-41.

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- **Golden State Corridor Economic Development Infrastructure Improvements: Planning, Engineering, and Environmental Study:** Developed Preliminary Roadway Design Plans, Preliminary Intersection Design Plans, and Air Quality/Global Warming, Noise, and Traffic Impact Studies; prepared layout of proposed improvements along the corridor consistent with the visioning document; prepared proposed intersections design plans consistent with proposed improvements.

- **State Route 198 Corridor Preservation and Improvement Strategic Plan:** As a subconsultant to Mott MacDonald, VRPA was responsible for completing traffic operations analysis and an evaluation of goods movement along the corridor; VRPA reviewed existing traffic and performance data as well as developed new data through collection of traffic counts; traffic accident data, and accident index allowing for the rating and comparison of different segments of the corridor; responsible for the evaluation of goods movement and potential benefits capacity and safety improvements may have on goods movement; assisted with development and performance measures, listing of potential projects and preparations of draft and final plans and associated public meetings to present the plan. The State Route 198 Corridor Preservation and Improvement Strategic Plan was prepared in coordination with Caltrans.

- **California High-Speed Rail Authority Bakersfield to Palmdale Engineering and Environmental Analysis:** Assisting with the preparation of the engineering and environmental analysis for the project segment; providing transportation engineering services including transportation analysis for the environmental document; coordinating with consulting teams on adjacent project segments; will be conducting a peer review of the transportation analysis for the Shafter to Bakersfield segment.

- **March Joint Powers Authority On-Call Traffic Engineering:** Since 2006, VRPA has been providing on-call traffic engineering services for March Joint Powers Authority; key tasks to date include the review of several major traffic impact analyses, development of traffic impact study guidelines, and review of proposed roadway signing and striping plans.

- **Mid County Parkway:** VRPA led all traffic analysis associated with the project, including the incorporation and update of local jurisdiction socioeconomic data and road networks for the travel demand modeling and traffic analysis for seven (7) alternatives. This effort included coordination between five (5) Cities and the County of Riverside. VRPA led efforts to compare and analyze the existing 2030 socioeconomic files against local City General Plans and new development projects surrounding the project area. As part of this project, VRPA prepared a signing plan for the I-15 freeway with the project in place. It included the location and layout of all major freeway guide signs.

Professional Qualifications

Education

- University of Michigan, Ann Arbor 1980-1981, Master of Science in Engineering (Civil Engineering)
- University of Michigan, Ann Arbor 1976-1979, Bachelor of Science in Engineering (Civil Engineering)

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2.2.3 RESPONSE TO COMMENT LETTER 3 – LOZANO SMITH ATTORNEYS AT LAW FOR THE CERES UNIFIED SCHOOL DISTRICT

RESPONSE TO COMMENT 3-1

The commenter introduces the Ceres Unified School District concerns regarding the Specific Plan and states their comments are intended to be part of the administrated record for the project. The commenter states the Draft EIR does not comply with CEQA for technical and substantive reasons, and states that the Draft EIR does not consider adequate mitigation measures or feasible alternatives. The commenter further states the District's primary concern is the lack of a requirement that Stanford Avenue be extended through to Moore Road.

The City appreciates the commenter's review of the Draft EIR. Responses to specific comments related to the Draft EIR's impact analysis, mitigation measures, and alternatives provided by Ceres Unified School District (CUSD) in this letter are addressed comprehensively herein, including the District's note about the design of Stanford Avenue.

RESPONSE TO COMMENT 3-2

The commenter states that the District prefers to cooperate with the City regarding the Specific Plan so as to help ensure that it will meet the purpose and goal of the Draft EIR and benefit the entire community, without undue and unmitigated impacts.

The City will continue to coordinate with and invite input from CUSD with respect to development within the Specific Plan Area.

RESPONSE TO COMMENT 3-3

The District requests that the City revise the Draft EIR to correct deficiencies identified in their comment letter, develop appropriate mitigation measures for impacts that are identified as significant, and then recirculate the revised Draft EIR as the commenter opines is required by CEQA.

The Draft EIR evaluated the full range of environmental topics areas, including the checklist questions identified in Appendix G of the CEQA Guidelines. The Draft EIR for the Specific Plan provides an adequate, complete, and good-faith, full disclosure of the physical environmental impacts, and the conclusions in the Draft EIR are based on substantial evidence in light of the whole record (CEQA Guidelines Section 15151).[1] The Draft EIR provides a detailed analyses related to the project's potential impacts on the environment, which is based on substantial evidence, including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines Section 15384).

If the proposed Whitmore Ranch Specific Plan is adopted, the project applicants for projects proposed under the Specific Plan will be required to implement the Draft EIR mitigation measures using performance standards in the context of detailed, site-specific contexts through the processing of future tentative subdivision maps, building permit applications, and similarly specific entitlement requests. As shown in the examples and for future mitigation imposed upon the Specific Plan throughout Chapter 3, the Draft EIR has committed the project

[1] "Substantial evidence" means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.

applicants to the imposed mitigation measures, has presented clear performance standards, has required future projects implemented under the Specific Plan to achieve the performance standards, and has described means of mitigating impacts that would achieve the performance standards.

A lead agency recirculates an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification (CEQA Guidelines Section 15088.5). New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.

"Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (*Mountain Lion Coalition v. Fish and Game Com.* [1989] 214 Cal.App.3d 1043).

In *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal. 4th 1112, the California Supreme Court interpreted this "significant new information" standard and explicitly rejected the proposition that "any new information" triggers recirculation. Recirculation is intended to be an exception, not the general rule. Recirculation is not required where new information added to the EIR clarifies or amplifies or makes insignificant modification in an adequate EIR (CEQA Guidelines Section 15088.5[b]). Recirculation is required if changes are more than clarification or amplifications and rise to the level of significant new information outlined above.

Chapter 3, "Errata," of this Final EIR corrects grammatical errors and provides additional supportive information in the utilities and service systems section. The revisions to the Draft EIR shown in Chapter 3 do not rise to the level of significant new information. There is no new significant environmental impact attributable to project impacts or a new mitigation measure added following circulation of the Draft EIR. There is no substantial increase in any environmental impact compared to that disclosed in the Draft EIR. There is no new feasible alternative or mitigation measure that would reduce an impact of the project, but that the City declines to adopt. The Draft EIR was not fundamentally flawed. Therefore, recirculation of the Draft EIR is not required.

Responses to specific comments provided by the CUSD in this letter are addressed extensively herein. The comments provided by the CUSD do not affect the analysis or conclusions presented in the Draft EIR.

RESPONSE TO COMMENT 3-4

The commenter states the Draft EIR fails to include an adequate project description.

Pursuant to CEQA Guidelines, an EIR project description should contain the location and boundaries of the proposed project by way of a map; a description of the project's technical, economic, and environmental characteristics; and a statement briefly describing the intended use of the EIR (CEQA Guidelines Section 15124[a]-[d]). The project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact" (CEQA Guidelines Section 15124). A general conceptual discussion of the main features of the project is sufficient (CEQA Guidelines Section 15124[a], [c]; *Dry Creek Citizens Coalition v. County of Tulare*, 70 Cal. App. 4th 20, 27-28 [1999]).

Chapter 2, "Project Description" of the Draft EIR provided extensive detail in an accurate, stable, and finite project description that presents the scope of the proposed project and includes all of the components identified in Section 15124 of the CEQA Guidelines Section 15124. Chapter 2 includes maps to identify the location of the proposed project and a description of the project components. The project description identifies the project objectives, the Specific Plan Area and surrounding land uses, proposed land uses and their location, and substantial detail on planned infrastructure improvements to serve buildout of the Specific Plan Area, and the actions required to implement the Specific Plan. See page 2-1 of the Draft EIR for the location of the Specific Plan Area, a summary of existing land uses in the area, and a summary of surrounding land uses. See page 2-7 of the Draft EIR for a summary of the Project Objectives. See pages 2-7 and 2-8 of the Draft EIR for a summary of permits, other approvals, and reviewing agencies that may relate to the implementation of the Specific Plan. Pages 2-8 through 2-12 detail the planned land uses in the Specific Plan Area. Pages 2-12 through 2-15 of the Draft EIR detail the drainage, water, sewer, electrical, natural gas, and transportation improvements necessary to serve the planned land uses. Page 2-16 details the intended uses of the EIR. In addition, the Draft EIR provides references to, and the City provided for review the Draft Specific Plan, which provides additional detail on the proposed project and the improvements needed to serve planned development in the Specific Plan Area.

Refer to the Response to Comment 3-13 for a detailed comparison of the traffic conditions with and without Stanford Avenue.

RESPONSE TO COMMENT 3-5

The commenter suggests that the DEIR traffic study did not evaluate morning and evening rush hour traffic conditions and project impacts.

Section 3.14, "Transportation," of the Draft EIR traffic analysis evaluated traffic conditions, impacts, and mitigation during weekday a.m. and p.m. peak hours at locations on roadways that are used for travel to CUSD schools based on data collected when area schools were in session.

See Responses to Comments 3-16 through 3-19 for a discussion of the Draft EIR's school-related analyses. See the Responses to Comments 3-5 through 3-14, which address traffic.

RESPONSE TO COMMENT 3-6

The commenter suggests that currently, in the District's experience, the intersection leading to the existing schools is impacted by existing traffic. The commenter states that the project will impact an intersection (i.e., Whitmore Avenue / Eastgate Boulevard intersection) where CUSD judges traffic operations to already be deficient based on observation.

The Draft EIR traffic analysis evaluated current conditions and assessed Specific Plan impacts to the Whitmore Avenue / Eastgate Boulevard intersection based on methodologies accepted by the City of Ceres (i.e., 2010 Highway Capacity Manual or HCM). Based on review of the traffic impact analysis prepared in 2009 for the Cesar Chavez Junior High[2], HCM methodologies have also been applied at intersections in traffic studies completed for CUSD. The 2009 traffic impact analysis is included as Appendix A of this Final EIR.

The Draft EIR traffic analysis evaluated Specific Plan impacts to the Whitmore Avenue / Eastgate Boulevard intersection based on operating Level of Service (LOS) under current background conditions, under conditions with completion of other approved projects, and under long-term cumulative conditions. The Draft EIR traffic analysis concluded that City Level of Service standards (i.e., LOS D) can be maintained under all scenarios and that Specific Plan's impacts at this location were not significant based on the LOS standards used in the Draft EIR and traffic analysis in Ceres generally.

As a point of reference current a.m. peak-hour traffic volumes at the Whitmore Avenue / Eastgate Boulevard intersection were compared to the forecasts contained in the original 2009 Junior High School traffic study (Appendix A). The 2009 study forecast a total opening day intersection approach volume of 1,631 vehicles per hour (vph) with 600 students and resulting LOS C conditions. That report did indicate, however, that longer delays indicative of LOS F condition could occur in the northbound Eastgate Boulevard left-turn lane with appreciable queueing. The current a.m. peak-hour traffic volumes counted for the Specific Plan Draft EIR traffic study totaled 1,814 vehicles per hour, but these volumes were accompanied by a Chavez Junior High school enrollment of 657 and background traffic growth since 2009. The resulting LOS D conditions at the intersection are consistent with the original Jr High School study conclusions.

See the Responses to Comments 3-5 through 3-14, which address traffic.

RESPONSE TO COMMENT 3-7

The commenter suggests that only one route is available to the CUSD schools (i.e., Whitmore Avenue) and that the project will significantly impact conditions on that route.

The Draft EIR traffic analysis identified current traffic volumes/operating conditions, assessed project impacts, and identified mitigation requirements for intersections on Whitmore Avenue between Mitchell Road and Faith Home Road. The analysis also addressed the flow of travel on Whitmore Avenue based on daily traffic volume. The analysis identified significant project impacts to three intersections and significant impacts to the two-lane segment of Whitmore Avenue west of Eastgate Boulevard. The Specific Plan impact is less than significant with implementation of Mitigation Measure 3.14-1a, which requires widening Whitmore Avenue to four lanes and Mitigation Measure 3.14-1b, which includes a traffic signal (Boothe Road intersection) and left-turn prohibitions

[2] Traffic Impact Analysis for the Ceres Junior High School, KD Anderson & Associates, January 28, 2009.

(Moore Road and Lunar Drive intersections). The Draft EIR analysis of this area is sufficient, and no additional analysis is required.

RESPONSE TO COMMENT 3-8

The commenter indicates that the school sites were developed with one access road – Eastgate Boulevard – as a dead-end street.

This comment is acknowledged, however while La Rosa Elementary School access is limited to Eastgate Boulevard, Cesar Chavez Junior High School also has two driveways on Whitmore Avenue.

Refer to the Response to Comment 3-13 for a detailed comparison of the traffic conditions with and without Stanford Avenue. See the Responses to Comments 3-5 through 3-14, which address traffic.

RESPONSE TO COMMENT 3-9

The commenter references the Stanislaus County Environmental Review Committee (SCERC) response to the DEIR Notice of Preparation which is quoted as indicating "a full segment of Stanford Avenue from Eastgate Boulevard to Moore Road should be part of the proposed project to help alleviate the increased traffic" and "also serve as a secondary east-west access to the junior high and elementary school and prevent new shortcut routes through the residential neighborhood."

The Specific Plan identifies connectivity across the southern portion of the Specific Plan Area, including a new segment of Stanford Avenue, and additional east-west segments that are offset somewhat to help calm traffic and enhance safety (see page 2-13 of the Draft EIR and page 5-4 of the Draft Specific Plan). In addition, the Specific Plan is planned to coordinate with the Safe Routes to School project that will enhance multi-modal connectivity to and from the school sites along Whitmore Avenue. In addition, the Specific Plan provides high-quality pedestrian/bicycle facilities through the center of the Specific Plan Area that enhance connectivity and access in the Specific Plan and to and from the school sites. The Specific Plan provides also for roadway access through the central portion of the Specific Plan Area. Finally, the Specific Plan proposes a range of housing types with high-quality multi-modal connectivity to and from the adjacent school sites so that more students are able to reach school in the future without the need to travel by car.

The Draft EIR traffic impact analysis assumes that Stanford Avenue is extended westerly from Eastgate Boulevard to the edge of the Specific Plan Area and that a route to Boothe Road and its intersection on Whitmore Avenue through the Specific Plan Area will be available. Refer to the Response to Comment 3-13 for a detailed comparison of the traffic conditions with and without Stanford Avenue.

The commenter makes reference to a comment letter from the Stanislaus County Environmental Review Committee. The Stanislaus County Environmental Review Committee also provided a comment letter on the Draft EIR, which reads:

"Thank you for the opportunity to review the above-referenced project. The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time. The ERC appreciates the opportunity to comment on this project."

See also Comment Letter 4.

RESPONSE TO COMMENT 3-10

The commenter suggests that the proposed circulation plan is contrary to the specific plan's stated goal to "avoid focusing too much traffic on any one route."

This comment does not identify any deficiency of the Draft EIR analysis.

As noted in the Draft EIR traffic analysis, primary access for new residential areas will be via Whitmore Avenue, but secondary access through the Specific Plan Area will be available to Moore Road and thence to Roeding Road. Multiple points of access on Whitmore Avenue will be available to avoid overloading any one street, and the internal grid street system is consistent with that multi-street access approach. In addition, as shown on page 5-4 of the Specific Plan, additional connectivity is provided to the south so that when areas are developed consistent with the General Plan, additional connectivity can be provided. The Specific Plan is planned to coordinate with the Safe Routes to School project that will enhance multi-modal connectivity to and from the school sites along Whitmore Avenue. The Specific Plan provides high-quality pedestrian/bicycle facilities through the center of the Specific Plan Area that enhance connectivity and access in the Specific Plan and to and from the school sites. The Specific Plan provides also for roadway access through the central portion of the Specific Plan Area.

The Draft EIR identified current traffic volumes/operating conditions (see pages 3.14-4 through 3.14-8 of the Draft EIR), assessed Specific Plan impacts (see pages 3.14-13 through 3.14-24), and identified mitigation requirements for intersections on Whitmore Avenue between Mitchell Road and Faith Home Road (see page 3.14-24 of the Draft EIR). The analysis also addressed the flow of travel on Whitmore Avenue based on daily traffic volume. The analysis identified significant project impacts to three intersections and significant impacts to the two-lane segment of Whitmore Avenue west of Eastgate Boulevard. The Specific Plan impact is less than significant with implementation of Mitigation Measure 3.14-1a, which requires widening Whitmore Avenue to four lanes and Mitigation Measure 3.14-1b, which includes a traffic signal (Boothe Road intersection) and left-turn prohibitions (Moore Road and Lunar Drive intersections) (see page 3.14-24 of the Draft EIR).

In addition, the Draft EIR provides analysis of the Specific Plan alongside past, present, and future developments would generate vehicular trips on roadways in the City of Ceres and the surrounding region. With regional growth and no Specific Plan, in 2040, the intersection of Whitmore Avenue with Mitchell Road is projected to operate at LOS E in the p.m. peak hour, and the intersection of Whitmore Avenue with Boothe Road is projected to operate at LOS E in the a.m. peak hour (see pages 5-30 and 5-31 of the Draft EIR). With regional growth and no Specific Plan, in 2040, all roadway segments will have adequate LOS.

In 2040, with regional growth and Specific Plan traffic, the Mitchell Road / Whitmore Avenue intersection is projected to deteriorate from LOS E to LOS F in the p.m. peak hour; the northbound approach to the Whitmore Avenue / Moore Road intersection will deteriorate to LOS F in the a.m. peak hour; the northbound approach to the Whitmore Avenue / Lunar Drive intersection will deteriorate to LOS F in the a.m. peak hour; the Whitmore Avenue / Boothe Road intersection is projected to deteriorate from LOS E to LOS F in the a.m. peak hour, and the Whitmore Avenue / Faith Home Road intersection is projected to operate at LOS E in the a.m. peak hour (see pages 5-31 and 5-32 of the Draft EIR).

With the implementation of Mitigation Measure 5-1, the Faith Home Road / Whitmore Avenue intersection would operate at a LOS D and the intersections of Moore Road/ Whitmore Avenue, Lunar Drive / Whitmore Avenue, and Boothe Road / Whitmore Avenue would operate at a LOS C or better (see Draft EIR, page 5-33).

Implementation of Mitigation Measure 5-1 would improve the LOS at the Mitchell Road/Whitmore Avenue intersection from a LOS F to a LOS E in the p.m. peak hour, but this would not achieve the LOS D standard. There is no feasible mitigation to improve the LOS at the Mitchell Road/Whitmore Avenue intersection to LOS D or better. As analyzed in the Draft EIR traffic study, there is no change to the Stanford Avenue connection across the southern portion of the Specific Plan Area that would address this cumulative impact. The Specific Plan is providing a high level of multi-modal connectivity through the Specific Plan Area, to and from the school sites, and to areas planned for future development under the General Plan.

RESPONSE TO COMMENT 3-11

The commenter requests more information regarding pedestrian safety, specifically with regard to pedestrians walking to area schools along Whitmore Avenue.

The Draft EIR identifies current facilities for all transportation modes in the Specific Plan Area and acknowledges the current limitations along the south side of Whitmore Avenue where dedicated pedestrian facilities are not available (see Draft EIR, pages 3.14-1 through 3.14-9). The Draft EIR explains that the City of Ceres was awarded a Safe Routes to School (SRTS) Program grant to develop improvements along the south side of Whitmore Avenue that will also enhance safety in the area. The Draft EIR concluded that if the SRTS program was not implemented, then the Specific Plan will construct an all-weather pedestrian facility (Mitigation Measure 3.14-4a). With this improvement, adequate pedestrian facilities will be provided, and the project's impact will be less than significant.

The Specific Plan identifies connectivity across the southern portion of the Specific Plan Area, including a new segment of Stanford Avenue, and additional east-west segments that are offset somewhat to help calm traffic and enhance safety (see page 2-13 of the Draft EIR and page 5-4 of the Draft Specific Plan). The Specific Plan provides high-quality pedestrian/bicycle facilities through the center of the Specific Plan Area that enhance connectivity and access in the Specific Plan and to and from the school sites. The Specific Plan proposes a range of housing types with high-quality multi-modal connectivity to and from the adjacent school sites so that more students are able to safely reach school in the future without the need to travel by car. As noted on page 3.14-22 of the Draft EIR, roadway improvements required within the City limits or Specific Plan Area will be constructed to City roadway standards, which are designed to avoid safety issues.

RESPONSE TO COMMENT 3-12

The commenter states that the Draft EIR does not adequately to address how added traffic impacts will affect response times for emergency services and first responders and that both the fire and police departments' response times will be affected. The commenter further states that Whitmore Avenue is currently the only major road that can be used to access the school sites.

Impact 3.8-5 in Section 3.8, "Hazards and Hazardous Materials," of the Draft EIR, the Specific Plan would require permits through the Ceres Fire Department and City of Ceres Building and Planning Division that ensure that the project provides sufficient access for fire and emergency response units consistent with the California Fire

Code and City of Ceres *Improvement Standards*, both of which identify minimum requirements for providing a reasonable level of life safety and property protection from fire hazards or other dangerous conditions. The circulation plans for the proposed project, subject to review and approval of the City of Ceres, will include sufficient ingress and egress routes to ensure public safety, in the event of an emergency.

The effects of the Specific Plan on Ceres Fire Department and Ceres Police Department response times are addressed in Section 3.13, "Public Services and Utilities, including Recreation and Energy," of the Draft EIR. As discussed Section 3.13, the Specific Plan would not affect Ceres Fire Department or Ceres Police Department response times (pages 3.13-28 to 3.13-30 of the Draft EIR).

See also the Response to Comment 3-10 for a discussion of the connectivity and access by the project and the effects of the project related to LOS.

The commenter, in a discussion about fire and police department response times, notes that response times are a particular concern since the students are considered sensitive receptors, with a reference to Section 3.11 of the Draft EIR, "Noise and Vibration." The relationship between emergency response and noise-sensitive receptors is unclear, but the analysis in the Draft EIR is comprehensive and does not require any revision in response to this comment.

See also the Responses to Comments 3-7 and 3-8.

RESPONSE TO COMMENT 3-13

The commenter request more information regarding school-related traffic impacts.

The Draft EIR traffic study has been revised to quantify the amount of vehicular traffic moving between Specific Plan Area residences and Specific Plan Area schools (see Appendix A of this Final EIR). The analysis has been expanded to consider Existing plus Project and Existing plus Approved Projects (EPAP) plus Project conditions with and without the extension of Stanford Avenue. The additional analysis indicates that, based on anticipated enrollment and Institute of Transportation Engineers (ITE) "per student" trip generation rates for schools, roughly 50 a.m. peak-hour parent vehicles could travel to Specific Plan Area schools as part of a drop-off trip that continues to other ultimate destinations. This travel would result in roughly 50 inbound and 50 outbound trips. These trips would primarily be on Stanford Avenue or would be added to the Whitmore Avenue / Eastgate Boulevard intersection until the connection along Stanford Avenue is made.

Until the Stanford Avenue connection is made, with drop-off trips occurring along Whitmore Avenue, no additional intersections would be impacted. In other words, there is no difference in the traffic impact whether or not the Stanford Avenue connection is made. The length of average delays would increase at the Whitmore Avenue / Eastgate Boulevard intersection, but overall LOS D would remain, and the City's minimum standard for LOS would be satisfied. The average delay per vehicle without Stanford Avenue at the Whitmore Avenue / Eastgate Boulevard intersection would be six seconds longer compared to the Existing plus Project scenario with Stanford Avenue.

RESPONSE TO COMMENT 3-14

The commenter references District correspondence from an engineering consultant hired by the CUSD.

Refer to the Responses to Comments 3-40 through 3-49.

RESPONSE TO COMMENT 3-15

The commenter links traffic impacts to the DEIR's discussion of Public Services and Utilities – Schools Related Impacts and suggests that potential traffic effects have not been evaluated.

As noted in previous responses, the Draft EIR and revised traffic study do address school related traffic issues. The Draft EIR comprehensively analyzes impacts in each environmental-topic section. For air quality effects, see Section 3.3 – this includes air quality effects associated with the whole of the project. As detailed in Section 3.3, this includes impacts associated with driving children to school, with natural gas use in planned homes, with constructing on- and off-site infrastructure needed to serve the planned uses, and all other direct and indirect sources of air pollutant emissions (see pages 3.3-26 and 3.3-27 of the Draft EIR). The analysis used default assumptions that do not reduce assumed travel demand based on the high-quality pedestrian and bicycle facilities, high level of connectivity of the Specific Plan to existing and future developed areas, or the presence of directly adjacent school sites. This is true, also, for each impact area – greenhouse gas emissions, transportation noise, etc.

RESPONSE TO COMMENT 3-16

The commenter states that the Draft EIR has no analysis regarding whether there would be a need for "new or physically altered" school facilities since the high school that would serve the Specific Plan is overcrowded and a new high school will eventually be needed. The commenter states that there is no analysis of the impact on the District's ability to continue providing adequate services. The commenter also states that the La Rosa Elementary School will not be able to accommodate all students from the Specific Plan without adding new facilities.

Based on Appendix G of the CEQA Guidelines, an impact related to public services is considered significant if a proposed project would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or result in the 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. The ability of the CUSD to provide adequate school services in and of itself is not a physical environmental impact on the environment.

Buildout of the Specific Plan will occur over the course of several years, depending on market conditions and other factors outside the control of the City and Specific Plan applicant. It is unknown at this time whether La Rosa Elementary School and the Central Valley High School would have sufficient capacity to accommodate the students generated by the Specific Plan. However, as stated in Impact 3.13-3, La Rosa Elementary School is operating *below* design capacity, while Central Valley High School is exceeding its design capacity (pages 3.13-31 and 32 of the Draft EIR). Developer fees are committed to payments on leased portable buildings, placing of new relocatables, and repayment of debt for facilities, in addition to matching funds for future projects (page 3.13-4 of the Draft EIR). As stated in Impact 3.13-3, the applicants for future projects proposed under the Specific Plan will be required to pay the State-mandated school impact fees levied at the time of development. If the CUSD determines that a new school facility is required, potential physical impacts associated with the new school

facility would be the subject of further, separate environmental review that would be conducted by the CUSD. The City does not control, and cannot predict whether CUSD would add new facilities in the future, re-program existing sites, add temporary classrooms, move students between schools, or take other actions in the future based on decreases or increases in enrollment. As shown on page 3.12-5 of the City's General Plan EIR, CUSD schools had a remaining capacity of 3,888 elementary, junior high, and high school students in the 2016-2017 school year (City of Ceres 2018).[3]

See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis. Also see Responses to Comments 3-18 and 3-19.

RESPONSE TO COMMENT 3-17

The commenter states that the Draft EIR does not discuss the limitations associated with constructing additions or adding portables to the existing school sites to accommodate students generated by the Specific Plan. The commenter also states that the Draft EIR offers only brief conclusory statements under Impact 3.13-3, that the Draft EIR fails sufficiently to analyze the impacts of the Specific Plan under its own standard stated in the Draft EIR, and states that an increase in student enrollment constitutes a significant impact. The commenter further states that the preparer of an EIR must make a genuine effort to obtain and disseminate information necessary to the understanding of impacts of project implementation.

The Draft EIR provides sufficient information necessary to understand the impact on elementary, middle, and high school facilities from implementation of the Specific Plan. The Draft EIR provides a detailed description of existing facilities at La Rosa Elementary School, Cesar Chavez Junior High School, and Central Valley High School (pages 3.13-3 and 3.13-4 of the Draft EIR) and provides the 2015–2016 enrollment, design capacity, and estimated remaining capacity for each school (Table 3.13-1 of the Draft EIR). Impact 3.13-3 uses this information to evaluate whether the Specific Plan would result in the need for new or expanded facilities. Impact 3.13-3 identifies the potential number of students generated by the Specific Plan based on student-yield generation rates provided in CUSD's School Facilities Needs Analysis completed in 2015 (see Table 3.13-7 of the Draft EIR). Impact 3.13-3 then compares the number of elementary, middle, and high school students generated by the Specific Plan to the design capacity at La Rosa Elementary School, Cesar Chavez Junior High School, and Central Valley High School. Finally, Impact 3.13-3 determines if these schools would have sufficient capacity to accommodate students generated by the Specific Plan.

As noted in the Draft EIR, it is likely that Cesar Chavez Junior High School would have sufficient capacity to accommodate all anticipated middle school students (55 new students). La Rosa Elementary School, which has a remaining capacity for 181 students, could potentially have insufficient capacity to accommodate all elementary school students (185 new students) at buildout of the proposed Specific Plan. It is unlikely that a school would add any facilities to accommodate four students. Central Valley High School, which is currently exceeding capacity, may have insufficient capacity to accommodate all anticipated high school students (95 new students) at buildout of the Specific Plan. As of the 2016–2017 school year, high schools in the CUSD have a remaining capacity of 568 students. The City does not control, and cannot predict whether CUSD would add new facilities in the future, re-program existing sites, add temporary classrooms, move students between schools, or take other actions in the future based on decreases or increases in enrollment.

[3] Ceres General Plan 2035 Environmental Impact Report. State Clearinghouse Number 2017052063.

The placement of a range of housing types with high-quality bicycle and pedestrian access to adjacent schools sites, along with high-quality bicycle and pedestrian facilities that provide safer connections to Specific Plan Area schools could allow more students to walk and bike to school compared to existing conditions. However, the conservative approach taken in the Draft EIR ("conservative" in this case meaning, tending to overestimate impacts) does not include assumptions about increases in the share of walking and biking trips for air quality or greenhouse gas emissions impacts.

Also see the Response to Comments 3-16. See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis.

RESPONSE TO COMMENT 3-18

The commenter states that failure adequately to address impacts on schools may be the result of a misconception arising from applicable California law. The commenter states that Senate Bill 50, as codified in relevant part in Government Code section 65996, does not relieve a lead agency from analyzing the impact on schools of a proposed project, concluding that there are significant impacts that may remain unmitigated, and further analyzing whether a mitigation measure is available adequately to mitigate the impacts. The commenter further states that the Specific Plan cannot be approved unless the City either imposes mitigation measures adequate to mitigate identified impacts to a level of less-than-significant or the City adopts an applicable statement of overriding consideration.

The intent of Senate Bill 50 (Chapter 407, Statutes of 1998) was to limit cities and counties to require mitigation of school facilities impacts as a condition of approving new development. Under Senate Bill 50, a school district may levy impact fees on new development in order to mitigate potential impacts of the development on school facilities, and payment of these fees is considered "full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of school facilities" (Government Code Section 65995). Government Code Section 65995 limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development, stating that a "local agency may not deny or refuse to approve a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization… on the basis of a person's refusal to provide school facilities mitigation that exceeds the amounts authorized pursuant to this section or pursuant to Section 65995.5 or 65995.7, as applicable." In addition, Government Code Section 65996(a) states "the following provisions shall be the exclusive methods of considering and mitigating impacts on school facilities … (1) Section 17620 of the Education Code and (2) Chapter 4.7 (commencing with Section 65970) of Division 1 of Title 7."

Government Code Section 65996(d) states "nothing in this chapter shall be interpreted to limit or prohibit the ability of a local agency to utilize other methods to provide school facilities." Therefore, a lead agency is not limited from considering other methods to provide school facilities but a lead agency is not required under this section to provide mitigation measures for impacts on school facilities.

See Response to Comment 3-17 related to the impact of the Specific Plan on school facilities. Also see Response to Comments 3-16. See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis.

RESPONSE TO COMMENT 3-19

The commenter states that statutory school impact fees would not sufficiently fund new facilities that will be needed to serve the Specific Plan area and states that the CUSD has adopted Level I fees. The commenter also states that Government Code section 65996(b) mentions only "school facilities mitigation," meaning that mitigation of impacts on issue other than the adequacy of school facilities must still be addressed.

The Draft EIR provides a detailed description of State school funding and the requirements that must be met for a school district to levy Level II and Level III developer impact fees (page 3.13-18 of the Draft EIR). The commenter states that the CUSD has adopted Level I school impact fees. However, as noted in the Draft EIR, the Ceres Unified School District Board of Trustees has adopted a Level II fee that became effective on September 21, 2017 (Resolution #05-17/18). The current statutory fees allowed under Education Code 17620 are increased every two years. As stated in Impact 3.13-3, the project applicants for future projects proposed under the Specific Plan would pay the State-mandated school impact fees to the CUSD that are being levied at the time of development.

See Response to Comment 3-17 related to the impact of the Specific Plan on school facilities. See also the Response to Comments 3-16. See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis. See also the Response to Comment 3-18.

As stated in Response to Comment 3-3, the Draft EIR evaluated the full range of environmental topics areas, including the checklist questions identified in Appendix G of the CEQA Guidelines, and the Draft EIR provides a detailed analyses related to the project's potential impacts on the environment, which is based on substantial evidence, including facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines Section 15384).

RESPONSE TO COMMENT 3-20

The commenter states that the Draft EIR is inadequate in its discussion of air quality impacts, particularly as related to the effects these impacts will have on the two adjacent schools. The commenter also states that the Draft EIR does not identify specific impacts related to the exposure of children to the emissions to toxic air contaminants that will occur during construction and operation of the Specific Plan, and states that the Draft EIR correspondingly fails to mitigate such impacts.

The Draft EIR provides a comprehensive analysis of the potential for exposure of sensitive receptors to substantial pollutant concentrations on pages 3.3-27 through 3.3-30.

As discussed here, construction activities would generate pollutants on a temporary basis, with emissions levels that would vary depending on the phase of construction (e.g., grading, building construction). For equipment-intensive phases, such as grading, construction-related emissions would be higher than other less equipment-intensive phases, such as building construction or architectural coatings. The equipment-intensive phases will be relatively shorter in duration compared to the building construction phases. Even in intensive phases of construction, there would not be substantial pollutant concentrations, with the potential exception of the

immediate vicinity of the construction site. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005).[4]

Emissions will decrease over time since there are current regulations that phase out older diesel equipment engines in favor of newer, cleaner equipment. In January 2001, United States Environmental Protection Agency (EPA) promulgated a final rule to reduce emissions standards for heavy-duty diesel engines in 2007 and subsequent model years. These emissions standards represent a *90 percent reduction* in nitrogen oxides (NO_X) emissions, 72 percent reduction of non-methane hydrocarbon emissions, and 90 percent reduction of PM emissions, in comparison to the emissions standards for the 2004 model year. In December 2004, California Air Resources Board (ARB) adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-road Diesel Rule that are nearly identical to those finalized by EPA on May 11, 2004. Tier 4 emission standards requires engine manufacturers to meet after-treatment-based exhaust standards for NO_X and particulate matter (PM) starting in 2011 that are more than 90 percent lower than current levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines. The Draft EIR has imposed mitigation that requires the newest, cleanest form of construction equipment (Tier 4) to ensure against any significant impact during construction.

As detailed in the Draft EIR (pages 3.3-29 and 3.3-30), there are no nearby high-volume roadways, the proposed residential and recreational uses would not generate substantial pollutant concentrations, and the Specific Plan would not add traffic to any intersection that would produce carbon monoxide hot spots for adjacent sensitive receptors.

As with the balance of the Draft EIR, Section 3.3, "Air Quality," is complete and comprehensive, with no need for any revision.

RESPONSE TO COMMENT 3-21

The commenter states that the DEIR's analysis of global climate change is flawed throughout for its reliance on the flawed assumptions contained elsewhere in the Draft EIR and also states that the Draft EIR fails to analyze impacts and instead relies on numerous laws and regulations to govern the effects of the emissions and offers minimal mitigation. The commenter expresses the opinion that the Draft EIR fails both as an informational document and in its analysis of the impacts on global climate change by failing to consider the added vehicle emissions and traffic that will undoubtedly result from encouraging residential growth in an area with already limited transportation routes, including in particular Stanford Avenue.

The Draft EIR provides a comprehensive analysis of greenhouse gas (GHG) emissions impacts in Section 3.7. With respect to the allegation that the Draft EIR does not account for "gridlock" related to unfinished roads, as detailed in the Response to Comment 3-13, there is no difference in the traffic impact whether or not the Stanford Avenue connection is made. The length of average delays would increase at the Whitmore Avenue / Eastgate Boulevard intersection, but overall LOS D would remain, and the City's minimum standard for LOS would be satisfied. The average delay per vehicle without Stanford Avenue at the Whitmore Avenue / Eastgate Boulevard intersection would be six seconds longer compared to the Existing plus Project scenario with Stanford Avenue.

[4] California Air Resources Board. 2005 (April). Air Quality and Land Use Handbook: A Community Health Perspective. Available: http://www.arb.ca.gov/ch/handbook.pdf. Accessed March 19, 2017.

The Draft EIR comprehensively analyzes impacts in each environmental-topic section. For GHG emissions effects, see Section 3.7 – this includes GHG effects associated with the whole of the project. As detailed in Section 3.7, this includes impacts associated with driving children to school, with natural gas use in planned homes, with constructing on- and off-site infrastructure needed to serve the planned uses, and all other direct and indirect sources of air pollutant emissions (see pages 3.7-10 through 3.7-18 of the Draft EIR, particular). The analysis used default assumptions that do not reduce assumed travel demand based on the high-quality pedestrian and bicycle facilities, high level of connectivity of the Specific Plan to existing and future developed areas, or the presence of directly adjacent school sites.

The commenter alleges that the Draft EIR relies on existing laws and regulations offers minimal mitigation. The City's focus with mitigation was not to have the same number of mitigation measures as the number of relevant laws and regulations related to GHG emissions, but rather to adopt all feasible mitigation with the intent of reducing or avoiding cumulative effects attributable to the Specific Plan.

See pages 3.7-17 and 3.7-18 of the Draft EIR, which include Mitigation Measures 3.7-1a and 3.1-7b. As detailed on page 3.7-18, Mitigation Measure 3.7-1a and 3.7-1b would reduce annual emissions by approximately 4,523 metric tons of carbon dioxide equivalents ($MTCO_2e$)/year or 45 percent, compared to unmitigated emissions. This is estimated to provide a GHG emissions rate of approximately 3.7 $MTCO_2e$/capita/year, which is consistent with the rate needed statewide to achieve the State's goals identified under Senate Bill (SB) 32 and Executive Order S-3-05. Achieving an emissions rate consistent with State goals would allow the City to demonstrate that development within the Specific Plan Area would be consistent with the statewide framework that, in California, has been established for assessing the cumulative significance of GHG emissions impacts. In addition, the Draft EIR outlines relevant laws and regulations on pages 3.7-4 through 3.7-10 that would have the effect of reducing the Specific Plan's GHG emissions, along with those from related past, present, and future projects.

RESPONSE TO COMMENT 3-22

The commenter states that the Draft EIR fails to analyze potential human health hazards from exposure to hazardous material and instead relies on contractors to "implement and comply with existing hazardous materials regulations," to govern the management of these hazardous materials and offers minimal mitigation. The commenter expresses the opinion that this lack of analysis of the actual impacts and failure to address any mitigation measure to offset these impacts is unacceptable, particularly since the Specific plan is proposed in a densely populated residential area adjacent to two school sites.

As discussed in Draft EIR Impact 3.8-1 in Section 3.8, "Hazards and Hazardous Materials" (pages 3.8-19 and 3.8-20), the transport, use, and storage of hazardous materials is heavily regulated at the federal, State, and local level. Some of the numerous regulatory controls over hazardous materials are presented in detail on Draft EIR pages 3.8-8 through 3.8-17. Project construction contractors are required by law to implement and comply with existing hazardous material regulations. Each of these regulations is specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated quicker response to emergencies.

In addition, Impact 3.8-2 analyzes the potential for construction workers to be exposed to hazardous materials present on-site during construction activities and the potential for on-site hazardous materials to create an environmental or health hazard for later residents or occupants, if left in place (pages 3.8-20 to 3.8-22 of the Draft EIR). Mitigation Measure 3.8-2 would reduce the potentially significant impacts related to exposure to hazardous

substances to a less-than-significant level because previously undiscovered and known hazardous substances would be removed and properly disposed of by a licensed contractor in accordance with federal, State, and local regulations.

RESPONSE TO COMMENT 3-23

The commenter states that the Draft EIR fails to describe the actual impacts to noise-sensitive receptors with any specificity and that the Draft EIR does not analyze the specific impacts on students and staff at the two school sites from traffic-related noise. The commenter also states that noise and vibrations could affect the very buildings in which students are housed.

The Draft EIR provides quantitative estimates of both short-term, construction-related noise effects, as well as long-term operational effects. See in particular pages 3.11-23 through 3.11-25 of the Draft EIR. As shown, existing noise-sensitive uses within 2,500 feet of heavy construction operations (which would include both schools) may experience unmitigated construction noise exposure in excess of the City's 55 decibel (dB) Equivalent Noise Level (L_{eq}) daytime limit. Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition/land clearing, grading, and excavation, erection). Construction noise in any one particular area would be temporary and short-term and would include noise from activities such as site preparation, truck hauling of material, pouring of concrete, and use of power tools. Noise would also be generated by construction equipment, including earthmovers, material handlers, and portable generators, and could reach high levels for brief periods. Although noise ranges are generally similar for all construction phases, the grading phase tends to involve the noisiest equipment, typically ranging from 88 dB to 91 dB Maximum Noise Level (L_{max}) at 50 feet. Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Average noise levels at construction sites typically range from approximately 65 to 89 dB L_{eq} at 50 feet, depending on the activities. The center of the junior high is approximately 1,320 feet from the center of the area proposed for construction in the Specific Plan Area. At this distance, average construction noise levels would be between 59 and 65 dB L_{eq}. The center of the elementary school is approximately 2,140 feet from the center of the area proposed for construction in the Specific Plan Area. At this distance, average construction noise levels would be between 53 and 59 dB L_{eq}.

The Draft EIR also quantifies changes in transportation noise. See pages 3.11-27 through 3.11-30 of the Draft EIR. Implementation of the proposed Specific Plan would result in an increase in traffic volumes and, consequently, an increase in traffic noise. Along Whitmore Avenue, east of Eastgate Road, in the vicinity of the schools, traffic attributable to the Specific Plan would increase noise levels by 1 dB Day-Night Average Noise Level (L_{dn}) at 50 feet. As on page 3.11-4, a 1-dB increase is imperceptible. For portions of the school site set back farther than 50 feet, the change would be reduced.

As described on page 3.11-32 of the Draft EIR, the proposed Specific Plan includes schools and recreational areas near schools, as well as park sites that are separated from schools. Noise-generating activities would depend on facility type/activities. Daytime noise associated with schools and parks typically includes intermittent noise such as voices, whistles associated with sporting events/practices, opening and closing of vehicle doors in parking lots, and use of landscape maintenance equipment. School uses may also result in mechanical noise associated with building air conditioning/ventilation systems.

Noise levels associated with landscape maintenance activities, including the use of large gasoline-powered mowers and leaf blowers, can range from approximately 66 to 72 dB L_{max} at 25 feet. Mechanical noise associated

with the operation of ventilation equipment required to service school facilities can result in average noise levels of 55 dB (L_{eq}) at approximately 175 feet from the source. Long-term noise measurements taken directly adjacent to Cesar Chavez Junior High School show existing noise levels of approximately 62 dB L_{dn}. As acknowledged in the Draft EIR, the adjacent school represents a potentially significant source of noise for planned on-site residences.

Noise typically associated with residential development includes amplified music, voices, recreational activities, and lawn and home maintenance equipment. Activities associated with these land uses would result in only minor and intermittent temporary noise exposure, as perceived at the closest residential receptors, primarily during the day and evening hours. Noise levels associated with residential land uses would also include the operation of exterior mechanical equipment (i.e., air conditioning units). Residential-use central air conditioning units typically produce noise levels in the range of 45–70 dB L_{eq} at a distance of 50 feet (page 3.11-32).

As with the balance of the Draft EIR, Section 3.11, "Noise and Vibration," is complete and comprehensive, with no need for any revision.

RESPONSE TO COMMENT 3-24

The commenter states that the Draft EIR is not compliant with CEQA because the City has not identified all or a reasonable number of mitigation measures to address significant impacts or other additional impacts that should have been identified. The commenter provides CEQA legal standards for context.

The commenter does not suggest additional feasible mitigation or additional impacts that were not considered in the Draft EIR. Responses to specific comments related to the Draft EIR's impact analysis, mitigation measures, and alternatives provided by CUSD in this letter are addressed herein. See also the Responses to Comments 3-3 and 3-37.

RESPONSE TO COMMENT 3-25

The commenter generally discusses deferred mitigation, enforceability of mitigation measures, and provides CEQA legal standards for context. The commenter states that Draft EIR proposed mitigation for impacts to Whitmore Avenue is inadequate, unenforceable, and deferred.

With regard to the commenter's allegation that the Draft EIR did not present analysis, but quantified the increase in traffic along Whitmore Avenue, the detailed analysis is presented in Section 3.14 of the Draft EIR, "Transportation," Chapter 5 of the Draft EIR, "Other CEQA Considerations" (for cumulative effects), Appendix G to the Draft EIR (the traffic report), throughout this Final EIR, and in Appendix A to this Final EIR, which is the traffic report with minor revisions in response to comments. The extensive analysis is reported in the form of narrative, explanatory text, impact summaries, tables showing changes in traffic volumes and levels of service, figures showing traffic volumes in specific locations with and without the project, and the regurgitation of aspects of the Draft EIR analysis throughout this Final EIR.

With regard to deferral, in certain circumstances, mitigation can be permissibly deferred where mitigation is known to be feasible, but practical considerations prevent a lead agency from establishing specific standards early in the development process. Such deferral of the specific design of mitigation is permissible when the lead agency commits itself to devising mitigation measures that will satisfy specific performance standards for evaluating the

efficacy of the measures and the project implementation is contingent upon the mitigation measures being in place and a deferred approach may be appropriate where it is not reasonably practical (*Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884; *Poet, LLC v. California Air Resources Board* (2013) 217 Cal.App.4th 1214; *Sacramento Old City Association v. City Council* (1991) Cal.App.3d 1011, 1028-1029; *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1275). CEQA Guidelines Section 15152 also acknowledges that "not all effects can be mitigated at each step of the process. There will be some effects for which mitigation will not be feasible at an early step of approving a particular development project." With regard to emergency access, the specific local street network, driveway locations, and other elements that are critical to emergency access occur not with a specific plan, but with the site planning for development projects implemented under specific plans. As noted on page 3.14-22 of the Draft EIR, roadway improvements required within the City limits or Specific Plan Area will be constructed to City roadway standards, which are designed to avoid safety issues.

The traffic impacts detailed in Chapter 3.14 of this Draft EIR are impacts that may occur when the proposed Specific Plan Area is developed. Furthermore, Mitigation Measure 3.14-1a of the Draft EIR specifies performance standards for mitigating impacts to Whitmore Avenue. Mitigation Measure 3.14-1a requires that the segment of Whitmore Avenue from Della Drive to Cesar Chavez Junior High School to be widened to 4 lanes before 44 percent of the dwelling units are occupied within the Specific Plan Area, or as directed by the City of Ceres. Each of the Draft EIR mitigation measures will be imposed as conditions of approval of the Specific Plan and future projects developed under the Specific Plan, as requested in the last paragraph of this comment.

See also the Responses to Comments 3-3, 3-6, 3-7, and 3-12.

RESPONSE TO COMMENT 3-26

The commenter states that the Draft EIR fails to explore mitigation measures that would alleviate the impact of the increases in student enrollment and the commenter also states that Government Code section 65996 does not preclude a host of other available means of addressing a School District's needs as a result of new development. The commenter further suggests alternative means of addressing the impacts of new development on schools.

The commenter states cites Government Code sections 65352 and 65352.2 and states that the City has made no meaningful effort to coordinate with the District and has failed to address this requirement in the Draft EIR. The commenter also states that the City can help the District provide adequate facilities required to offset the impact of the Specific Plan by acknowledging the significant impact on schools and requiring alternative mitigation measures to assure that there is an adequate site to accommodate school facilities if and when needed.

The Draft EIR provides analysis related to the potential student generation within the Specific Plan, broken into elementary, middle, and high school students. The Draft EIR also provides a detailed description of existing facilities at La Rosa Elementary School, Cesar Chavez Junior High School, and Central Valley High School (pages 3.13-3 and 3.13-4 of the Draft EIR) and provides the 2015–2016 enrollment, design capacity, and estimated remaining capacity for each school (Table 3.13-1 of the Draft EIR). As noted in the Draft EIR, it is likely that Cesar Chavez Junior High School would have sufficient capacity to accommodate all anticipated middle school students (55 new students). La Rosa Elementary School, which has a remaining capacity for 181 students, could potentially have insufficient capacity to accommodate all elementary school students (185 new students) at buildout of the proposed Specific Plan. It is unlikely that a school would add any facilities to accommodate four students. Central Valley High School, which is currently exceeding capacity, may have

insufficient capacity to accommodate all anticipated high school students (95 new students) at buildout of the Specific Plan. As of the 2016–2017 school year, high schools in the CUSD have a remaining capacity of 568 students. The City does not control, and cannot predict whether CUSD would add new facilities in the future, re-program existing sites, add temporary classrooms, move students between schools, or take other actions in the future based on decreases or increases in enrollment.

The City reached out to the School District in February of 2017 to get input related to the Specific Plan. The City inquired whether the undeveloped land in the northwestern portion of the Specific Plan Area should be assumed to develop with new school facilities or an expansion of the existing school facilities, and the District indicated that the City should make no assumption in that respect. The City also inquired as to whether the Draft EIR should assume any increase in capacity at the existing school sites and again the City was directed to make no such assumption.

See Responses to Comments 3-18, 3-19, and 3-27. See also the Response to Comments 3-16. See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis.

The commenter references Government Code Sections 65350 et seq., 65352, and 65352.2. Sections 65350 et seq. states that cities and counties shall prepare, adopt, and amend general plans and elements of those general plans in the manner provided the section. More specifically, Government Code Sections 65352 and 65352.2 require cities and counties to coordinate with school districts to plan for future school siting upon adoption of their general plans. Adoption of the Specific Plan is not subject to the requirements of Government Code Sections 65352 and 65352.2. However, as noted, the City did ask the School District at the beginning of the Specific Plan process what assumptions to use for District-owned property within the Specific Plan, and the City was directed to assume no change.

RESPONSE TO COMMENT 3-27

The commenter states that one possible mitigation method would be for the City to consider adopting findings requiring any developer building as part of the development allowed by the Specific Plan to dedicate land and/or funding pursuant to Government Code sections 65970, et seq., which permits the City to require a developer to dedicate land to a School District.

See Responses to Comments 3-18 and 3-26.

RESPONSE TO COMMENT 3-28

The commenter states that another method that can serve as an appropriate mitigation measure is the requirement all future development to be phased so that timing of development balances the availability of school facilities.

Buildout of the Specific Plan is anticipated to occur over the course of several years, depending on market conditions and other factors outside the control of the City and Specific Plan applicant. See also the Responses to Comments 3-18 and 3-26.

RESPONSE TO COMMENT 3-29

The commenter states that the Draft EIR concedes that during development and operation of the Specific Plan, there would be an increase in the potential for exposure to sensitive land uses to substantial concentrations of toxic air contaminants and states the Draft EIR only proposed mitigation measure is to require site developers and project applicants to "construct all facilities using current phase construction equipment (currently Tier 4) to reduce exposure of sensitive receptors to any toxic air contaminants. The commenter states that this measure lacks either specificity or analysis as to its effectiveness.

In January 2001, EPA promulgated a final rule to reduce emissions standards for heavy-duty diesel engines in 2007 and subsequent model years. These emissions standards represent a *90 percent reduction* in NO_X emissions, 72 percent reduction of non-methane hydrocarbon emissions, and 90 percent reduction of PM emissions, in comparison to the emissions standards for the 2004 model year. In December 2004, ARB adopted a fourth phase of emission standards (Tier 4) in the Clean Air Non-road Diesel Rule that are nearly identical to those finalized by EPA on May 11, 2004. Tier 4 emission standards requires engine manufacturers to meet after-treatment-based exhaust standards for NO_X and PM starting in 2011 that are more than 90 percent lower than current levels, putting emissions from off-road engines virtually on par with those from on-road heavy-duty diesel engines. The Draft EIR has imposed mitigation that requires the newest, cleanest form of construction equipment (Tier 4) to ensure against any significant impact during construction.

Regarding the commenter's allegation that the mitigation measure lacks specificity, to the contrary, the mitigation measure requires the use of a specifically identified tier of construction equipment, the designation of which is specifically tied to reductions in pollutant concentrations.

RESPONSE TO COMMENT 3-30

The commenter suggests that additional reasonable mitigation measures include requiring site developers and project applicants to extend Stanford Avenue so as to alleviate traffic congestion and offer more space for construction equipment to be further away from the School Sites.

Refer to the Response to Comment 3-13 for a detailed comparison of the traffic conditions with and without Stanford Avenue. As shown, there is no difference in impact whether or not Stanford Avenue is extended.

RESPONSE TO COMMENT 3-31

The commenter suggests that additional reasonable mitigation measures include construction of a sound wall between the School Sites and the Project and installation of double pane windows at the School Sites.

See Response to Comment 3-20 related to the use of construction equipment within the Specific Plan Area. Refer to the Response to Comment 3-23 for a discussion of the use of construction equipment in the Specific Pan Area and mitigation related to construction noise. Mitigation Measure 3.11-1 does include a provision to store and maintain equipment as far as feasible from noise-sensitive receptors, including the schools.

With respect to the installation of double pane windows and a sound wall, the Specific Plan will not have a significant operational noise impact in relation to the schools. See the Response to Comment 3-23.

RESPONSE TO COMMENT 3-32

The commenter suggests that an additional reasonable mitigation measure include installation of updated HVAC systems throughout the School Sites.

With respect to heating, ventilation, and air conditioning (HVAC) system upgrades, there is no relevant significant impact this would mitigate. See the Response to Comment 3-20.

RESPONSE TO COMMENT 3-33

The commenter states that each of these measures would at least limit student exposure to poor air quality and should be a prerequisite to any development that occurs on the Specific Plan area, immediately adjacent to the School Sites. The commenter further states that such measures would be imposed on the Project applicant, as the Draft EIR cannot delegate mitigation responsibility to other agencies, including the District.

See the Responses to Comments 3-29 through 3-32.

RESPONSE TO COMMENT 3-34

The commenter states that the Draft EIR concludes that the Specific Plan would result in cumulatively considerable contribution to significant climate change, states that the Draft EIR proposes to reduce such impacts by requiring contractors for the Specific Plan to use electric and renewable fuel powered equipment, and further states that the Draft EIR considers this mitigation is insufficient and the impact is considered significant and unavoidable. The commenter states that the Draft EIR does not consider other potential mitigation measures and instead relies on numerous laws and regulations to mitigate these greenhouse emission impacts, yet none of these laws and regulations specifically address the greenhouse emission impacts to the School Sites, nor is there analysis of how these laws and regulations will work to reduce impacts to a level of less than significant.

See the Response to Comment 3-21.

The conservative finding for this impact is based on the fact that the City cannot dictate the extension of transit into the area, which depends on funding and ridership levels that neither the City nor the project applicants can control. The City did consider all feasible mitigation. There is no GHG emissions impact to the school sites. The Draft EIR explains how each of the relevant laws and regulations reduces GHG emissions impacts.

RESPONSE TO COMMENT 3-35

The commenter states that the Draft EIR fails to analyze potential human health hazards from exposure to hazardous material and instead relies on contractors to implement and comply with existing hazardous materials regulations to govern the management of these hazardous materials and offers minimal mitigation. The commenter states that the Draft EIR does not consider the effectiveness of these measures, and that the Draft EIR does not consider several feasible mitigation measures, including: placement of setbacks between the School Site and the Project; installation of double pane windows at the School Site; installation of updated HVAC systems throughout the School Sites; or restriction on deliveries, pickups, and use of heavy machinery at the Project during drop-off and pick-up times for students at the School Sites. The commenter further states that such measures would be imposed on the Project applicant, as the Draft EIR cannot delegate mitigation responsibility to other agencies, including the District.

See Responses to Comments 3-22 and 3-31 to 3-33.

RESPONSE TO COMMENT 3-36

The commenter states that the Draft EIR considers the Specific Plan's impact of temporary, short-term construction activities to be significant and states that the Draft EIR proposes minimal mitigation to this impact and concludes the impact is significant and unavoidable. The commenter states that the Draft EIR does not consider any additional potential mitigation measures.

Refer to the Response to Comment 3-23. See the Responses to Comments 3-29 through 3-32.

RESPONSE TO COMMENT 3-37

The commenter states that the Draft EIR does not consider an alternative that would require developers to extend Stanford Avenue or other address transportation and noise impacts or an alternative proposing a lower density project. The commenter also states that the City's decision-makers cannot determine whether or not an option involving the extension of Stanford Avenue or an alternative proposing lower density could avoid or lessen the impacts of the Specific Plan while still meeting the project's objectives.

Refer to the Response to Comment 3-13 for a detailed comparison of the traffic conditions with and without Stanford Avenue. As shown, there is no difference in impact whether or not Stanford Avenue is extended.

Each alternative was evaluated according to the "rule of reason" and general feasibility criteria suggested by the CEQA Guidelines Section 15126.6, as follows:

> *The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.*

The City has considered a range of alternatives that could feasibly attain most of the basic project objectives and avoid or substantially lessen one or more significant effects. Alternatives were selected for evaluation in the Draft EIR based on criteria in the CEQA Guidelines Section 15126.6, which are summarized above. These criteria are:

- Ability of the alternative to attain most of the basic project objectives;
- Feasibility of the alternative; and
- Ability of the alternative to avoid or substantially reduce one or more significant environmental effects of the proposed project.

The City also received input as a part of the Notice of Preparation and scoping process regarding environmental issues of interest, some of which are addressed, as appropriate, by the alternatives provided in Chapter 4, "Alternatives."

Alternative 2, "Revised Site Plan Alternative to Reduce Transportation, Noise, and Greenhouse Gas Emissions Impacts," is specifically intended to reduce potential impacts related to transportation by adjusting the density of development within the Specific Plan Area. As stated on page 4-8 in Chapter 4 of the Draft EIR, this alternative would *decrease* the amount of land for low-density residential development and increase the amount of land provided for medium-density and high-density development compared to the proposed project. Overall density would increase by approximately 30 percent under Alternative 2 compared to the proposed project, which subsequently would reduce per-unit travel demand (vehicle miles traveled, or "VMT") compared to the proposed project. Increasing development density can reduce trip frequency and expand mode choice (to modes other than passenger vehicle). The "elasticity" between density increases and VMT decreases is an indication of how strongly these variables are related. Studies have found that the elasticity between a density increase, on one hand, and VMT reduction, on the other, is between 7 and 19 percent (Boarnet and Handy 2014).[5]

A lower-density alternative would increase impacts related to GHG emissions since fewer homes would be placed in proximity to schools, commercial areas, and recreational amenities. While a lower-density alternative could potentially reduce congestion effects at some intersections, the congestion at these intersections is primarily the result of existing development and areawide growth. A lower density alternative would conflict with the Project Objectives, namely, the objective to promote a distinct, identifiable neighborhood that integrates a variety of housing types.

A lower-density alternative would also be inconsistent with the City's General Plan. As shown on page 2-5, Exhibit 2-4, the Specific Plan proposes the same land use designations as the General Plan for the Specific Plan Area. See also Appendix A of the Specific Plan, which provides a detailed consistency analysis with the General Plan. A lower-density alternative would be inconsistent with Policy 2.A.6:

> *Policy 2.A.6: Range of Housing. Ensure that a range of residential densities and housing types, including small-lot single family, move-up, townhouses, apartments, accessory dwelling units, affordable housing, senior housing, and condominiums, is available to accommodate the housing needs of all residents.*

The Specific Plan, by contrast, is consistent with this policy and supports a wide range of housing types.

Finally, the Specific Plan requires on- and off-site infrastructure and high-quality pedestrian/bicycle facilities through the center of the Specific Plan Area that enhance connectivity and access in the Specific Plan to and from the school sites. The Specific Plan provides a high level of connectivity within the Specific Plan Area and to existing and future developed areas. All of these improvements require funding. Refer to Chapter 8 of the Specific Plan, "Administration and Financing." A lower-density alternative would not only increase the rate of GHG emissions, be inconsistent with the Project Objectives, and be inconsistent with the General Plan, but would also reduce the overall amount of developer financing for infrastructure, and would therefore be infeasible.

RESPONSE TO COMMENT 3-38

The commenter states that CEQA requires an EIR to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans and states that the Draft EIR does not adequately

[5] For more information, see "Impacts of Residential Density on Passenger Vehicle Use and Greenhouse Gas Emissions, Policy Brief" by Marlon G. Boarnet from the University of Southern California and Susan Handy from the University of California, Davis. Available: https://www.arb.ca.gov/cc/sb375/policies/density/residential_density_brief.pdf.

consider consistency with the General Plan. The commenter further lists several of the proposed plans in the Draft EIR and alleges that they conflict with General Plan goals. The commenter states that the Draft EIR does not include sufficient information related to the potential environmental impacts the Specific Plan will have related to expected traffic impacts and on the adjacent School Sites. The commenter states that the Draft EIR's deficient analysis of these issues leads to an incorrect conclusion that the Draft EIR is consistent with the General Plan goals and policies.

The commenter is incorrect that the Specific Plan is inconsistent with the General Plan, but the City Council will ultimately make this determination. See the Response to Comment 3-37. The commenter alleges inconsistencies with policies related to integrating land use, well-connected neighborhoods, and safe and convenient multi-modal accessibility.

To the contrary, the Specific Plan is consistent with each of the referenced General Plan policies. The Specific Plan identifies multi-modal connectivity through the Specific Plan Area. Refer to Specific Plan Figure 5-2 on page 5-4 of the Specific Plan, Figure 5-3 on page 5-5 of the Specific Plan, Figure 5-4 on page 5-6 of the Specific Plan, Figure 5-5 on page 5-7 of the Specific Plan, Figure 5-6 on page 5-8 of the Specific Plan, Figures 5-7 and 5-8 on page 5-9 of the Specific Plan, Figure 5-9 on page 5-10 of the Specific Plan, Figure 5-10 on page 5-11 of the Specific Plan, which illustrate the multi-modal approach.

The Specific Plan is planned to coordinate with the Safe Routes to School project that will enhance multi-modal connectivity to and from the school sites along Whitmore Avenue. The Specific Plan provides high-quality pedestrian/bicycle facilities through the center of the Specific Plan Area that enhance connectivity and access in the Specific Plan and to and from the school sites. The Specific Plan provides also for roadway access through the central portion of the Specific Plan Area. Finally, the Specific Plan proposes a range of housing types with high-quality multi-modal connectivity to and from the adjacent school sites so that more students are able to reach school in the future without the need to travel by car. The Specific Plan includes a variety of housing types in proximity to schools, commercial areas, and recreational amenities.

The Specific Plan provides for extension of transit to serve planned land uses, as well. See Section 5.3 of the Specific Plan, starting on page 5-15. Mitigation Measure 3.7-1b requires the City to communicate with Stanislaus Regional Transit and Ceres Area Transit to determine whether the Specific Plan Area can accommodate an extension of transit and whether an additional bus stop should be provided on the south side of Whitmore Avenue.

See Responses to Comments 3-15 through 3-19 for information related to schools. See the Responses to Comments 3-5 through 3-14, which address traffic.

RESPONSE TO COMMENT 3-39

The commenter provides a conclusion to their commenter letter. The commenter states that the Draft EIR does not adequately analyze the Specific Plan's potential impacts and must address with greater specificity the effects of these impacts on school facilities and services, student safety, traffic and more, as addressed in this letter. The commenter states that the Draft EIR fails to propose adequate mitigation measures or reasonable alternatives to address these impacts and fails to acknowledge and assess the many inconsistencies between the Specific Plan and the General Plan. The commenter encourages the City and project proponents to work cooperatively with the District and states that the District is ready to continue meeting and working with the City and the Project developer to address these vital issues.

Responses to specific comments related to the Draft EIR's impact analysis, mitigation measures, and alternatives provided by CUSD in this letter are addressed extensively in Responses to Comments 3-3 through 3-39.

The City will continue to coordinate with and invite input from CUSD with respect to development within the Specific Plan Area. Since the submittal of the commenter's letter, the City has facilitated a discussion between the City, the project applicant, and the commenter to discuss topics included in the commenter's letter.

RESPONSE TO COMMENT 3-40

The comment refers to a footnote in DEIR traffic study Table 1 (Level of Service Definitions).

The table has been revised in the revised traffic study to reference the 2010 HCM, which was the methodology employed in the traffic analysis. See Chapter 3 of the Final EIR, "Errata."

RESPONSE TO COMMENT 3-41

The comment asks for clarification of the source of DEIR traffic study Table 2 (Roadway Segment Level of Service Thresholds).

This table identifies daily traffic volumes that are applicable planning-level LOS thresholds on roadway segments. The overall roadway capacity is based on Table 3.13-6 of the City of Ceres General Plan EIR. The incremental volume / capacity ranges within the overall General Plan capacities are based on data from the 1985 Highway Capacity Manual. The revised traffic study includes this reference. See Appendix A to this Final EIR for the traffic study, with minor revisions.

RESPONSE TO COMMENT 3-42

The comment asks for assessment of the Eastgate Boulevard / Stanford Avenue intersection.

The Draft EIR traffic impact analysis has been revised to provide information for that location under a.m. peak-hour conditions with and without the extension of Stanford Avenue to the Specific Plan residential area. These forecasts include both trips generated by residences to CUSD schools, as well as exiting school traffic that may be diverted to this alternative route. No additional significant traffic impacts were identified for this scenario nor were additional mitigations required.

See the Responses to Comments 3-5 through 3-14.

RESPONSE TO COMMENT 3-43

The comment questions traffic study assumptions regarding roadway improvements based on identified funding.

See the Responses to Comments 3-5 through 3-14.

As noted in the comment, Stanford Avenue is not a street identified in the City's existing Public Facilities Fee (PFF) project list. The analysis of cumulative impacts was intended to be consistent with the General Plan's land use and circulation system assumptions. The General Plan land use element identifies growth in the areas south of the Specific Plan Area, and Circulation Element and EIR traffic model included roadways that will link new growth areas to the Specific Plan Area and to other major streets. Analysis of future conditions under the General

Plan which assumes future land use without corresponding access streets is unreasonable. See the Specific Plan Financing Plan, which includes the cost of Stanford Avenue improvements.

RESPONSE TO COMMENT 3-44

The comment asks for analysis of the Eastgate Boulevard / Stanford Avenue intersection and of the effects of the Stanford Avenue extension to Eastgate Boulevard.

This information is provided in the revised traffic analysis. See Appendix A to this Final EIR for the traffic study, with minor revisions. No additional significant traffic impacts were identified, and no additional mitigations were required.

RESPONSE TO COMMENT 3-45

The comment asks for development of project trip distribution assumptions based on an alternative approach (i.e., traffic model "select zone run") and suggests that the trip distribution assumptions made for the CUSD schools is not applicable to WRSP residential areas.

Various methods are available for identifying the distribution of trips associated with new development. While tracking the path of trips using the regional traffic model is one method, because the Specific Plan Area is located in an area of other developed residences, it is possible to identify applicable assumptions based on review of current turning movement patterns at intersections. Traffic model results were reviewed at the Specific Plan Area's access locations to supplement data based on current patterns, but a "select zone run" across the entire study area was not required. The traffic study text does, however, incorrectly attribute trip distribution to assumptions previously made for the junior high. The text has been revised to note that original junior high assumptions were used to redistribute existing traffic caused by the Stanford Avenue connection. See Appendix A to this Final EIR for the traffic study, with minor revisions.

RESPONSE TO COMMENT 3-46

The comment suggests discrepancies between trip distribution assumptions presented in Figure 4 and Table 7.

Figure 4 has been revised to match the table. No change to analysis results or traffic study conclusions accompanies the change. See Appendix A to this Final EIR for the traffic study, with minor revisions.

RESPONSE TO COMMENT 3-47

The comment notes that the traffic analysis does not identify p.m. peak hour traffic at two intersections.

These two locations are the Cesar Chavez Junior High School's current access to Whitmore Avenue. These two locations would not carry appreciable school traffic during the weekday p.m. peak hour (i.e., 4:00 to 6:00 p.m.), since the school day ends earlier in the afternoon. The operation of these locations would not have an appreciable effect on overall traffic flow, particularly since the central school access is "inbound only." In addition, the traffic study completed for the junior high did not address weekday p.m. peak hour conditions. Based on these considerations, evaluation of these two locations during the weekday p.m. peak hour is not required.

RESPONSE TO COMMENT 3-48

The comment notes a discrepancy in traffic forecasts in Figure 5.

The figure was reviewed and a typographical error was identified that was not made in the LOS analysis. Figure 5 was corrected in one direction at one intersection. No change to analysis results or conclusions resulted. See Appendix A to this Final EIR for the traffic study, with minor revisions.

RESPONSE TO COMMENT 3-49

The comment suggests that the traffic impact analysis and Draft EIR be revised to address methodological errors, to disclose the methodology used to develop trip distribution, and to address Stanford Avenue.

These issues were all addressed in preceding comments and applicable revisions have been made to the traffic impact analysis to respond, particularly with regards to Stanford Avenue. No change to traffic impacts was identified, no additional traffic impacts were found, and no additional mitigation measures were required.

Letter 4

Stanislaus County

RECEIVED
AUG 14 2018
CITY OF CERES
COMMUNITY DEVELOPMENT

CHIEF EXECUTIVE OFFICE

Jody L. Hayes
Chief Executive Officer

Patricia Hill Thomas
Chief Operations Officer/
Assistant Executive Officer

Keith D. Boggs
Assistant Executive Officer

Patrice M. Dietrich
Assistant Executive Officer

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

August 14, 2018

Tom Westbrook
Director of Community Development
City of Ceres
Engineering Services Department

SUBJECT: ENVIRONMENTAL REFERRAL – CITY OF CERES – WHITMORE RANCH SPECIFIC PLAN – NOTICE OF AVAILABILITY – DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Mr. Westbrook:

Thank you for the opportunity to review the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time. 4-1

The ERC appreciates the opportunity to comment on this project.

Sincerely,

Patrick Cavanah
Sr. Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

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2.2.4 RESPONSE TO COMMENT LETTER 4 – STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

RESPONSE TO COMMENT 4-1

The commenter states that the Stanislaus County Environmental Review Committee has reviewed the project and has no comments at this time.

The City appreciates the commenter's review of the Draft EIR.

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Letter 5

Stanislaus
LAFCO
LOCAL AGENCY FORMATION COMMISSION

August 13, 2018

Tom Westbrook

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR WHITMORE RANCH SPECIFIC PLAN

Dear Mr. Westbrook,

Thank you for the opportunity to review the City's Draft Environmental Impact Report (DEIR) for the Whitmore Ranch Specific Plan. As Lead Agency, the City of Ceres is responsible for considering the effects, both individual and collective, of all activities involved in the project (Public Resources Code §21000 et seq). LAFCO, as a Responsible Agency, will utilize the CEQA documents prepared by the City in reviewing the proposed annexation of the Specific Plan area. 5-1

LAFCO staff previously commented on the Notice of Preparation for the DEIR (February 28, 2017) and identified applicable LAFCO policies and requirements in anticipation of an annexation application. LAFCO considers numerous factors when reviewing annexations, including orderly growth, impacts to agricultural lands, impacts to special districts, and availability of services. 5-2

The following provides additional comments following review of the DEIR and Specific Plan for the project:

- **Agricultural Resources:** One of LAFCO's main charges, as set forth by the Legislature, is to protect and promote agriculture. As described in the DEIR, the Commission has adopted an Agricultural Preservation Policy that requires applicants to prepare a "Plan for Agricultural Preservation" for annexation proposals that will impact agricultural lands. According to the DEIR, the proposed project will result in a permanent conversion and loss of 51.7 acres of Prime Farmland within Stanislaus County. The proposed Mitigation Measure 3.2-1, would require offsetting the loss of Prime Farmland through the acquisition of conservation easements in Stanislaus County at a 1:1 ratio. LAFCO Staff encourages that the City retain this mitigation measure as part of its adoption of the final EIR. 5-3

As part of its Plan for Agricultural Preservation, the City will also be required to provide information regarding existing vacant lands in its jurisdiction that could be developed for the same or similar uses. In approving any proposed annexation that includes agricultural lands, the Commission must find that there is insufficient alternative land available and that development is imminent for all or a substantial portion of the proposal area. 5-4

- **Plan for Providing Services:** Upon application for annexation, the City must prepare a Plan for Providing Services, consistent with Government Code §56653. 5-5

- **Special Districts:** The proposed Specific Plan area is currently within the boundary of the Ceres Fire Protection District. Commission policies recognize that city spheres generally take precedence over these districts. Pursuant to LAFCO policy, the Commission will deny proposals that would result in significant immitigable adverse effects upon other service recipients or other agencies servicing the affected area unless the approval is conditioned to avoid such impacts. Any future annexation proposal should identify whether or not the City intends to detach the territory from these districts, provide applicable agreements, and include a discussion of any impacts as a result. 5-6

If you have any questions regarding these comments, you can reach me via email at _____.

Sincerely,

Javier Camarena
Assistant Executive Officer

2.2.5 RESPONSE TO COMMENT LETTER 5 – STANISLAUS COUNTY LOCAL AGENCY FORMATION COMMISSION

RESPONSE TO COMMENT 5-1

The commenter thanks the City for providing LAFCO the opportunity to review the Draft EIR. The commenter states that LAFCO will use the CEQA documents prepared by the City in reviewing the proposed annexation of the Specific Plan area.

The City appreciates the commenter's review of the Draft EIR. The City acknowledges that Local Agency Formation Commission (LAFCO) will use CEQA documents prepared by the City during LAFCO's review for annexation of the Specific Plan Area.

RESPONSE TO COMMENT 5-2

The commenter states that LAFCO staff previously commented on the Notice of Preparation for the Draft EIR and identified applicable LAFCO policies and requirements in anticipation of an annexation application. The commenter also states that LAFCO considers numerous factors when reviewing annexations, including orderly growth, impacts to agricultural lands, impacts to special districts, and availability of services.

A copy of LAFCO's letter on the NOP is provided in Appendix A of the Draft EIR. The Draft EIR addresses LAFCO's comments, as appropriate. Section 3.2, Agricultural Resources," of the Draft EIR addresses impacts to agricultural lands, Section 3.13, "Public Services and Utilities, including Recreation and Energy," addresses impacts to special districts and the availability of services, and Chapter 5.0, "Other CEQA," discusses orderly growth.

RESPONSE TO COMMENT 5-3

The commenter states that as described in the Draft EIR, the Commission has adopted an Agricultural Preservation Policy that requires applicants to prepare a "Plan for Agricultural Preservation" for annexation proposals that will impact agricultural lands. The commenter encourages the City to retain Mitigation Measure 3.2-1 as part of its adoption of the final EIR.

A detailed description of LAFCO's Agricultural Preservation Policy is provided in the Draft EIR (pages 3.2-8 and 3.2-9). Per City General Plan Policy 4.A.7, the City would develop a Plan for Agricultural Preservation upon application for a SOI expansion or annexation that includes agricultural land, consistent with the Stanislaus LAFCO Agricultural Preservation Policy (City of Ceres 2018a). Furthermore, the City will adopt Mitigation Measure 3.2-1,which requires preservation of Important Farmland through the acquisition of conservation easements in Stanislaus County at a 1:1 ratio; or payment of in-lieu fees; or compliance with the City's Plan for Agricultural Preservation, as adopted by Stanislaus LAFCO in accordance with LAFCO Policy 22, upon certification of the Final EIR (page 3.2-12 of the Draft EIR).

RESPONSE TO COMMENT 5-4

The commenter states that as part of its Plan for Agricultural Preservation, the City will also be required to provide information regarding existing vacant lands in its jurisdiction that could be developed for the same or

similar uses and states that the Commission must find that there is insufficient alternative land available and that development is imminent for all or a substantial portion of the proposal area.

Please see Response to Comment 5-3.

RESPONSE TO COMMENT 5-5

The commenter states that upon application for annexation, the City must prepare a Plan for Providing Services, consistent with Government Code §56653.

The City acknowledges a Plan for Providing Services, consistent with Government Code Section 56653, would be required prior to annexation of the Specific Plan.

RESPONSE TO COMMENT 5-6

The commenter states that the proposed Specific Plan Area is currently within the boundary of the Ceres Fire Protection District, and pursuant to LAFCO policy, the Commission will deny proposals that would result in significant immitigable adverse effects upon other service recipients or other agencies servicing the affected area unless the approval is conditioned to avoid such impacts. In addition, the commenter states any future annexation proposal should identify whether or not the City intends to detach the territory from these districts, provide applicable agreements, and include a discussion of any impacts as a result.

As discussed in Section 3.13 of the Draft EIR, the Ceres Fire Department provides fire protection and emergency medical services to the Ceres Fire Protection District, and the City of Ceres Fire Department would continue to provide fire protection services to the Specific Plan. Impact 3.13-1 analyzes the impacts on increased demand for fire protection facilities and services (page 3.13-29 of the Draft EIR). As stated in Impact 3.13-1, the proposed Specific Plan would not affect Ceres Fire Department response times or other performance objectives (Westbrook, pers. comm., 2017).

Furthermore, Mitigation Measure 3.13-1 requires that the project applicants for projects proposed under the Specific Plan pay to the City fees adopted by Chapter 16.08 of the City of Ceres Municipal Code, which ensures fire protection personnel and equipment is provided to meet increased demand for fire protection services. In addition, Mitigation Measure 3.13-1 requires project applicants for projects proposed under the Specific Plan to establish a community facilities district, per Chapter 13.46 of the City of Ceres Municipal Code. Establishment of community facilities districts ensures that new residential development pays for the cost of providing services to new development so that existing development will not be subject to a reduced level of service. Therefore, the Specific Plan would not result in significant adverse effects on the Ceres Fire Protection District.

Letter 6

From: Tom Westbrook
Sent: Wednesday, July 25, 2018 9:01 AM
To: Gerken, Matthew
Subject: Fwd: RE: Whitmore Ranch Specific Plan - DEIR

Matthew,

Please see below from Todd Troglin at TID.

TW
>>> "Todd R. Troglin" 7/25/2018 8:25 AM >>> Tom,

Thanks for coordinating yesterday's meeting with City staff and Matthew G. with AECOM concerning the proposed building setbacks for the Whitmore Ranch project.

As was discussed, TID's primary concern was that there be a minimum setback of 15 feet (not 10' as proposed) from back of sidewalk to front of building structure, including porches, to allow sufficient space for safe placement of TID electrical facilities along with the other dry utilities within the joint trench and 10 foot PUE. Additionally, need to ensure large landscaping trees aren't located in close proximity to the underground electrical, which does not appear to be a problem based on the current conceptual layouts. The initial take was that the change to the building setbacks would be doable, but AECOM staff was going to perform a more detailed review to confirm. 6-1

Lastly, we advised that also need to consult with PG&E as it is our understanding, based on recent interactions with them on other projects, that they would also need the additional setback for safe placement of the natural gas lines. You indicated you had a PG&E contact on another project that you would check with to confirm their needs. 6-2

Please keep us informed if there are any changes based on AECOM's review and the discussion with PG&E.

Thanks,
Todd

Todd Troglin
Supervising Engineering Technician | Turlock Irrigation District

From: Tom Westbrook
Sent: Tuesday, July 17, 2018 11:22 AM

To: Todd R. Troglin
Cc: David N. Porath; Edward D. Jeffers
Subject: RE: Whitmore Ranch Specific Plan - DEIR

Todd,

Sounds good. We'll meet in the Annex Conference Room at City Hall, which is located at 2220 Magnolia Street. I have a meeting scheduled for 2:00 p.m. that day so we will need to discuss options within the time allotted. Thanks.

TW
>>> "Todd R. Troglin" 7/17/2018 11:16 AM >>> Tom,

I think it would be best to meet in person, so we can review the project's proposed layouts, maps, etc. I think the discussion will be helped along with the visual props, so to speak.

Todd

From: Tom Westbrook
Sent: Tuesday, July 17, 2018 11:10 AM
To: Todd R. Troglin
Subject: RE: Whitmore Ranch Specific Plan - DEIR

Todd,

I'll set us up for then. Do you want to come to the City or participate by phone?

TW
>>> "Todd R. Troglin" 7/16/2018 12:49 PM >>> Tom,

It looks like the afternoon of the 24th at 1:30 works best.

Thanks,
Todd

From: Tom Westbrook
Sent: Thursday, July 12, 2018 4:26 PM
To: Todd R. Troglin
Subject: RE: Whitmore Ranch Specific Plan - DEIR

Todd,

Our consultant would like to participate but will be on vacation next week. We have time in the afternoon on July 23rd and July 24th. Would one of those days work for you?

TW
>>> "Todd R. Troglin" 7/10/2018 5:00 PM >>> Tom,

Right now we are open any time Tuesday and Thursday next week.

Todd

From: Tom Westbrook
Sent: Tuesday, July 10, 2018 4:43 PM
To: Todd R. Troglin
Subject: Re: Whitmore Ranch Specific Plan - DEIR

Todd,

Are there days/times next week that would work for you and your team? Let me know and I will look to get something set.

TW
>>> "Todd R. Troglin" 7/10/2018 4:13 PM >>> Hello Tom,

I wanted to reach out to you in order to facilitate a potential meeting on the above noted project. As detailed in the attached prior comments to this project, TID has concerns about placement of dry utilities relative to proposed buildings, landscaping and other utilities. Among other things, we have concerns for the proposed 10-foot building setbacks, which do not necessarily fit our standards for construction of the electrical infrastructure. Additionally, based on past interactions with PG&E on other projects, we believe there could be issues with the required separation to PG&E natural gas lines. 6-3

The layout of this proposed neighborhood is unlike anything that we have been involved with previously. Rather than prepare another letter, we felt it might be more productive to have a discussion with the City, the project proponents and potentially PG&E. If you don't have a good PG&E contact, our Electrical Engineering staff have local PG&E counterparts that we could likely invite to such a meeting. 6-4

Could you please facilitate such a meeting? If not, can you put us in contact with the "developer" for this project.

Thanks,
Todd

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Todd Troglin
Supervising Engineering Technician | Turlock Irrigation District

2.2.6 RESPONSE TO COMMENT LETTER 6 – TURLOCK IRRIGATION DISTRICT (LETTER 1)

RESPONSE TO COMMENT 6-1

The commenter briefly summarizes the meeting that occurred on July 25, 2018, between the TID, the City, and AECOM. The commenter states that TID's primary concern is that a minimum setback of 15 feet is provided from back of sidewalk to front of building structure, instead of 10 feet as proposed in the Specific Plan, to allow sufficient space for safe placement of TID electrical facilities along with the other dry utilities within the joint trench. Additionally, the commenter states that there is need to ensure large landscaping trees aren't located in close proximity to the underground electrical, and that AECOM staff was going to perform a more detailed review of the setback distances to confirm.

The minimum setback distances have been revised. See pages 4-13 and 4-15 of the Specific Plan. The guidance related to large trees has been added to page 6-8 of the Specific Plan.

RESPONSE TO COMMENT 6-2

The commenter advised that the City consult with PG&E regarding safe setbacks for placement of natural gas lines.

The City will coordinate with Pacific Gas & Electric Company (PG&E), as appropriate, though buildout of the Specific Plan regarding placement of natural gas lines.

RESPONSE TO COMMENT 6-3

The commenter states that TID has concerns about placement of dry utilities relative to proposed buildings; landscaping; and other utilities, including concerns for the proposed 10-foot building setbacks, within the Specific Plan's neighborhoods, and the commenter further states that there could be issues with the required separation to PG&E natural gas lines.

TID's concerns were discussed in the meeting that occurred on July 25, 2018, between the TID, the City, and AECOM. Please see Responses to Comments 6-1 and 6-2.

RESPONSE TO COMMENT 6-4

The commenter requests a meeting with the City to discuss placement of dry utilities within the Specific Plan's neighborhoods.

The requested meeting occurred on July 25, 2018. Please see the Response to Comment 6-1.

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Letter 7

WATER & POWER
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March 1, 2017

City of Ceres
Planning and Building Division
Attn: James Michaels

RE: Whitmore Ranch Specific Plan- NOP of EIR

Dear Mr. Michaels:

The Turlock Irrigation District (District) acknowledges the opportunity to review and comment on the referenced project. District standards require development occurring within the District's boundary that impacts irrigation and electric facilities, to meet the District's requirements. 7-1

A review of District records indicates there are 4 irrigation distribution pipelines systems within the Specific Plan area. Three of these lines serve only the plan area and the fourth serves land both within and south of the plan area. The portion of the fourth line adjacent to the most southwestern LDR block depicted on exhibit 4 will need to be upgraded to current development standards when that area develops. It is likely that the other three lines could be eliminated if an overall strategy for mitigating impacts to irrigation is developed to avoid inefficiencies that can occur when reviewing on a project-by-project basis. 7-2

As noted in the report, TID will provide electric service to the plan area as individual projects are developed. This will require appropriately positioned and sized PUEs for the dry utilities. It is important that there is adequate separation between the dry utilities and the large trees in the proposed park/open spaces adjacent to the public right of ways. Specific easement requirements will be determined when the subdivision maps are prepared for the project area. 7-3

If you have any questions concerning irrigation system requirements, please contact me at . Questions regarding electric utility requirements should be directed to David Porath

Sincerely,

Todd Troglin
Supervising Engineering Technician, Civil
CF: 2017010

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2.2.7 RESPONSE TO COMMENT LETTER 7 – TURLOCK IRRIGATION DISTRICT (LETTER 2)

RESPONSE TO COMMENT 7-1

The commenter states that the TID acknowledges the opportunity to review and comment on the project and states that District standards require development occurring within the District's boundary that impacts irrigation and electric facilities to meet the District's requirements.

The City appreciates the commenter's review of the Draft EIR. The City acknowledges that development under the Specific Plan that would affect TID's irrigation or electrical facilities will meet TID's requirements.

RESPONSE TO COMMENT 7-2

The commenter advised that the City consult with PG&E regarding safe setbacks for placement of natural gas lines.

Please see Response to Comment 6-2.

RESPONSE TO COMMENT 7-3

The commenter states that TID has concerns about placement of dry utilities relative to proposed buildings; landscaping; and other utilities, including concerns for the proposed 10-foot building setbacks, within the Specific Plan's neighborhoods, and the commenter further states that there could be issues with the required separation to PG&E natural gas lines.

TID's concerns were discussed in the meeting that occurred on July 25, 2018, between the TID, the City, and AECOM. Please see Response to Comment 6-1.

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Letter 8

Tom Westbrook - Fwd: Opposition to Whitmore Ranch Site Proposal/Resubmission of Cousins 9/29/16 statement in Opposition to Annex Application; 8/6/18

From: Patricia Cousins
To: Tom Westbrook , Michael Cousins
Date: 8/6/2018 7:51 AM
Subject: Fwd: Opposition to Whitmore Ranch Site Proposal/Resubmission of Cousins 9/29/16 statement in Opposition to Annex Application; 8/6/18

Please add to our 8/3/2018 Opposition to the Whitmore specific plan, draft Environmental Impact Report this prior Statement in Opposition submitted previously **9/29/2016. Please confirm receipt.**

Patricia M. Cousins and Michael D. Cousins, tenants in common

-------- Forwarded Message --------
Subject: Opposition to Whitmore Ranch Site Proposal
Date: Thu, 29 Sep 2016 12:04:11 -0700
From: Patricia Cousins
To: Tom Westbrook , SM Coakley
CC: Patricia Cousins

Re: Application No. 14-08 Annex ,14-09 GPA, 14-10 PCMP Fax 538-5675 **OPPOSITION**

This **OPPOSITION** from adjacent landowners, Cousins, Allen, Coakley, OBJECTS to the proposed Whitmore Ranch Site Plan Concept Updated 08/24/16 (owners trees lower right parcel on Site Plan Concept). 8-1

Ironic that the urban sprawl proposal is called "Whitmore Ranch." Better name/truthful description, Whitmore Ranchless, since sprawling over 100+ more acres obviously removes those 100+ acres forever from farming, ranching, rural uses and replaces cool, green, and fertile with streets, cars, and houses. Of course that is what is intended. We object. 8-2

When La Rosa School was created, good neighborliness was promised. Reality: trash immediately began to be thrown over the fence and continues to accumulate. More people promises more trash, noise and disruption of bird song and harvesting. Almond dust is preferred to gasoline, diesel, and other urban fumes, excessive light, and noise. 8-3

The water necessary to develop and sustain this proposal will hasten and exacerbate the sinking water table, encouraging increasing contamination by nitrates, uranium, and other noxious elements. Who wants to drink (to) that? 8-4

Develop and re-develop already urban sprawl places and spaces. Standiford Ave./Road from Moore to Faith Home was closed following adjacent landowner requests about 1910 to encourage rural life and Esmar was dead-ended for the same reason. Leave it be and force development on the west side, land that was annexed first under the guise of necessary housing. That it is too costly for the developers to develop is a poor excuse to alter existing plans. Stick with the plan. 8-5

Patricia Melugin Cousins and Michael D. Cousins 9/29/16

Co-owners Janet (Melugin) Allen and Stella Melugin Coakley join in this OPPOSITION.

Tom Westbrook - Whitmore specific plan, draft Environmental Impact Report

From: SM Coakley
To: Tom Westbrook
Date: 8/3/2018 12:30 PM
Subject: Whitmore specific plan, draft Environmental Impact Report

Mr. Westbrook,

Unfortunately, I am on travel and am unable to go back to the Draft EIR which I was in the process of reviewing because of poor internet connections. The 486 pages do not download very easily! These comments are intended for the Planning Commission's August 6th meeting; I may augment them after reviewing the document further. 8-6

In any case, I did review both the Whitmore Specific Plan and start through the "Draft" Environmental Impact Report. I will raise my objections to these from the perspective of there being an inadequate solution for the displacement of agricultural functions on the property proposed for development. While I appreciate all the required effort to minimize impact, allowing the significant environmental impact on agriculture is not in the best interests of the community. 8-7

I find it difficult to imagine that the proposed development (and therefore Environmental Impact Report) can possibly proceed as proposed since there is absolutely no documentation that the land-owners are in agreement as to the development of this property in such a way as to meet the many "insignificant, temporary" environmental impacts. A planned community is a wonderful thing but only if its development can proceed as envisioned. The EIR largely assumes that it will be possible or that work-arounds can be made. This effectively opens the door to the likelihood of much larger impacts which will be unmonitored to a large degree. 8-8

I note that the proposed park/open-space area (5.2 vs 5.9 A) is less than dictated by code; increasing that space would like reduce overall negative environmental impact on this community. The Planning Commission should require full compliance with that point. 8-9

In Fig.2-4, it is evident that there would be the removal of an orchard fronting Moore; that is but one example of displacement of agriculture and the draft EIR repeatedly points out that you can't really mitigate this impact. 8-10

In summary, I believe that the draft EIR, based on assumption of a full planned development, is inadequate to protect the neighboring properties and to preserve agricultural functions in the area. 8-11

Thank you,
Stella Melugin Coakley

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2.2.8 RESPONSE TO COMMENT LETTER 8 – PATRICIA COUSINS AND SM COAKLEY

RESPONSE TO COMMENT 8-1

The commenter states their opposition to the proposed Whitmore Ranch Site Plan Concept Updated 08/24/16.

The commenter's opposition to the project is acknowledged. This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

RESPONSE TO COMMENT 8-2

The commenter states that the Specific Plan removes those 100+ acres forever from farming, ranching, rural uses and replaces cool, green, and fertile with streets, cars, and houses.

This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

RESPONSE TO COMMENT 8-3

The commenter expresses the opinion that more people promises more trash, noise and disruption of bird song and harvesting. The commenter prefers almond dust to gasoline, diesel, and other urban fumes, excessive light, and noise.

Noise is addressed comprehensively in Section 3.11 of the Draft EIR, "Noise and Vibration." Air Quality is addressed in Section 3.3 of the Draft EIR. Light is addressed in Section 3.1 of the Draft EIR, "Aesthetics." This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

RESPONSE TO COMMENT 8-4

The commenter expresses the opinion that the water necessary to develop and sustain this proposal will hasten and exacerbate the sinking water table.

The Draft EIR provides evidence that the Specific Plan would not hasten or exacerbate the groundwater table. Section 3.9, "Hydrology and Water Quality," of the Draft EIR provides a description of groundwater hydrology, including groundwater quality and recharge (pages 3.9-2 through 3.9-6 of the Draft EIR). Impact 3.9-4 analyzes the potential for the Specific Plan to deplete of groundwater supplies and interfere with groundwater recharge (pages 3.9-29 through 3.9-31 of the Draft EIR). As discussed in Impact 3.9-4, the proposed Specific Plan would not substantially deplete groundwater supplies such that there would be a net deficit in aquifer volume or a substantial lowering of the level of the local groundwater table. In addition, Mitigation Measures 3.9-4a and 3.9-4b require applicants for projects proposed within the Specific Plan Area to demonstrate to the City of Ceres Engineering Division that the proposed Specific Plan includes development and implementation of best

management practices and low impact development measures (e.g., the detention basin, plants appropriate for stormwater management) that would help to *increase* groundwater recharge following development.

RESPONSE TO COMMENT 8-5

The commenter states Stanford Avenue/Road from Moore Road to Faith Home Road was closed following adjacent landowner requests about 1910 to encourage rural life and Esmar Road was dead-ended for the same reason. The commenter expresses the opinion that development should occur on the west side and that is too costly for the developers to develop is a poor excuse to alter existing plans.

This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

RESPONSE TO COMMENT 8-6

The commenter states that the comments are intended for the Planning Commission's August 6th meeting and the commenter states that she may augment the comments after further review of the document.

The City acknowledges that the comments herein were intended for the Planning Commission's August 6th meeting. The commenter did not provide any subsequent written comments.

RESPONSE TO COMMENT 8-7

The commenter states that she reviewed the Whitmore Specific Plan and Draft Environmental Impact Report. The commenter expresses the opinion that allowing the significant environmental impact on agriculture is not in the best interests of the community.

Agricultural resources impacts are addressed in Section 3.2 of the Draft EIR. Per City General Plan Policy 4.A.7, the City will develop a Plan for Agricultural Preservation upon application for a SOI expansion or annexation that includes agricultural land, consistent with the Stanislaus LAFCO Agricultural Preservation Policy (City of Ceres 2018a). Furthermore, the City will adopt Mitigation Measure 3.2- 1, which requires preservation of Important Farmland through the acquisition of conservation easements in Stanislaus County at a 1:1 ratio; or payment of in-lieu fees; or compliance with the City's Plan for Agricultural Preservation, as adopted by Stanislaus LAFCO in accordance with LAFCO Policy 22, upon certification of the Final EIR (page 3.2-12 of the Draft EIR).

The City appreciates the commenter's review of the Draft EIR. This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Please see Responses to Comments 8-9, 8-10, and 8-11.

RESPONSE TO COMMENT 8-8

The commenter states that it difficult to imagine that the proposed development (and therefore Environmental Impact Report) can possibly proceed as proposed since there is absolutely no documentation that the land-owners

are in agreement as to the development of this property in such a way as to meet the many "insignificant, temporary" environmental impacts. The commenter states that the EIR largely assumes that it will be possible or that work-arounds can be made and that this effectively opens the door to the likelihood of much larger impacts which will be unmonitored to a large degree.

The Specific Plan and EIR anticipate development of the Specific Plan Area consistent with Section 4.2 of the Specific Plan, "Land Use Plan and Program," development standards and design guidelines presented throughout the Specific Plan, and mitigation required by the Draft EIR over the course of several years. This may occur through developments of different size, sometimes involving individual parcels and sometimes involving multiple parcels. The commenter is correct that full implementation of the Specific Plan may involve coordinated efforts among property owners. Whether future projects involve single properties or multiple properties, applicable development standards and design guidelines of the Specific Plan apply and applicable mitigation measures are required.

This comment does not raise questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

RESPONSE TO COMMENT 8-9

The commenter states that the proposed park/open-space area is less than dictated by code and the commenter expresses the opinion that increasing that space would reduce overall negative environmental impact on this community. The commenter states that Planning Commission should require full compliance with that point.

As discussed in Impact 3.13-4, in Section 3.13, "Public Services and Utilities, including Recreation and Energy," of the Draft EIR, funding for parks and recreation facilities resulting for new construction is facilitated through the Public Facilities Fee (Title 16, Chapter 16.08 of the City of Ceres Municipal Code). This one-time fee provides financing for City public facilities, including parks, to maintain adequate levels of service and ensure that new development pays its fair share for those public facilities. In addition, the City requires as a condition of approval of a tentative subdivision map or parcel map, the subdivider must dedicate land for development of local parks and/or, pay a park fee in lieu of land dedication (Title 17, Chapter 17.34 of the City of Ceres Municipal Code).

As discussed in the Draft EIR (see pages 3.13-32 and 3.13-33), based on the estimated 1,485 new residents that could occupy the Specific Plan Area at buildout, approximately 5.9 acres of parks and open space would be required to be consistent with the City's parkland standard. The proposed Specific Plan includes approximately 5.2 acres of public open space for passive recreational opportunities and stormwater management features, as well as a high-quality, east-west bicycle and pedestrian connection. The proposed 5.2 acres of public open space is slightly less than the 5.9 acres required to meet the City's parkland requirements. Applicants for future projects proposed under the Specific Plan would be required to pay in-lieu parkland fees on a fair-share basis to account for the approximately 0.7-acre shortfall between the City's parkland standard and that proposed on-site (pages 3.13-32 and 3.13-33 of the Draft EIR).

RESPONSE TO COMMENT 8-10

The commenter states that in Figure 2-4, it is evident that there would be the removal of an orchard fronting Moore. The commenter further states that is but one example of displacement of agriculture and the Draft EIR repeatedly points out that you can't really mitigate this impact.

Section 3.2, "Agricultural Resources," of the Draft EIR discusses the conversion of agricultural land to nonagricultural uses. As discussed in Impact 3.2-1, the Stanislaus County LAFCO, which is charged with approving changes in jurisdictional limits and public service areas, also reviews proposals in relation to their impact to agricultural lands. According to Government Code Section 56668, among the factors to be considered by LAFCO in reviewing organizational and boundary changes is, "the effect of the proposal on maintaining the physical and economic integrity of agricultural lands." Policy 22 of the LAFCO Policies and Procedures is intended to guide development away from agricultural lands where possible and encourage efficient development of existing vacant lands and infill properties; fully consider the impacts a proposal will have on existing agricultural lands; minimize the conversion of agricultural land to other uses; and promote preservation of agricultural lands for continued agricultural uses, while balancing the need for planned, orderly development and the efficient provision of services. Policy 22 describes strategies for the conservation of agricultural land consistent with LAFCO policies and requires preparation of a Plan for Agricultural Preservation to assist the Commission in determining how a proposal meets the stated goals of Policy 22.

Mitigation Measure 3.2-1 requires applicants for projects in the Specific Plan Area to offset the loss of Prime Farmland through the acquisition of conservation easements in Stanislaus County at a 1:1 ratio that provide in-kind or similar resource value protection; or payment of in-lieu fees; or compliance with the City's Plan for Agricultural Preservation, as adopted by Stanislaus LAFCO in accordance with LAFCO Policy 22 (page 3.2-12 of the Draft EIR). Subsection 3.2.2, "Regulatory Framework," in Section 3.2 provides the specific requirements of the Agricultural Preservation Policy (pages 3.2-8 and 3.2-9 of the Draft EIR).

RESPONSE TO COMMENT 8-11

The commenter expresses the opinion that the Draft EIR, based on assumption of a full planned development, is inadequate to protect the neighboring properties and to preserve agricultural functions in the area.

Please see the Response to Comment 8-8.

Impact 3.2-2 in Section 3.2 of the Draft EIR provides a detailed analysis of potential conflicts associated with development of the Specific Plan and adjacent agricultural uses (pages 3.2-13 through 3.2-15). As discussed in Impact 3.2-2, after development of the Specific Plan Area, the only potential conflicts would exist along the southern boundary, and would only exist between agricultural uses and residential uses. Instead of backing up directly to adjacent existing agricultural uses south of the Specific Plan Area, residential uses in the southeastern and southwestern portion of the Specific Plan Area, along the southern border of the Specific Plan Area would be set back from the off-site agricultural operations by Stanford Avenue. The Specific Plan allows for a range of lotting patterns and design approaches that would satisfy its development standards and design guidelines. If future development includes lots that back onto Stanford Avenue, they would incorporate landscaped buffers and have a relatively deeper rear yard – deeper than the minimum provided by the applicable development standards, if needed (Specific Plan Section 4.4.3, Residential Neighborhood Guidelines).

In addition, Mitigation Measure 3.2-2 would require project applicants to provide Stanislaus County's Right-to Farm Notice to notify prospective residents of potential land use conflicts associated with agricultural activities adjacent to the Specific Plan Area (page 3.2-14 of the Draft EIR). The County's Right-to-Farm Ordinance ensures that agricultural operations that are operated in a manner consistent with proper and accepted customs and standards are allowed to continue. This Ordinance also requires that notification be provided to residents of property on or near agricultural land to prepare residents to accept inconveniences or discomforts that can be associated with agricultural operations, including but not limited to noise, odors, flies, fumes, dust, the operation of machinery of any kind during any 24-hour period (including aircraft), the storage and disposal of manure, and the application by spraying or otherwise of chemical fertilizers, soil amendments, herbicides and pesticides.

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Letter 9

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

August 13, 2018

RECEIVED
AUG 13 2018
CITY OF CERES
COMMUNITY DEVELOPMENT

Tom Westbrook
City of Ceres

Subject: Whitmore Ranch Specific Plan Environmental Impact Report
SCH#: 2017012063

Dear Tom Westbrook:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 10, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

9-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2017012063
Project Title Whitmore Ranch Specific Plan Environmental Impact Report
Lead Agency Ceres, City of

Type EIR Draft EIR

Description The specific plan land will provide for a range of densities and housing types, parkland and other open space, existing schools, and supportive infrastructure on approx 94 acres of land. The proposed SP land use diagram provides approx 28 acres for low density residential, 6.6 acres for medium-density residential, and 6.4 acres for high-density residential, and once fully developed, could provide opportunities for as many as 441 new dwelling units. Approx 5.2 acres is designated parks/OS. Existing schools occupy approx 36 acres. Planned improvements would include pedestrian and bicycle facilities along Whitmore Ave and Moore Rd, multi-modal extensions of Lunar Dr and Boothe Rd through the SPA, and new facility along the southern boundary (Stanford Ave).

Lead Agency Contact

Name Tom Westbrook
Agency City of Ceres
Phone **Fax**
email
Address 2220 Magnolia Street
City Ceres **State** CA **Zip** 95307

Project Location

County Stanislaus
City Ceres
Region
Lat / Long 37° 35' 34.6" N / 120° 17.9" W
Cross Streets Whitmore Ave and Moore Rd
Parcel No. 069-017-001 to 008 and 010, 013
Township 4S **Range** 9E **Section** 13 **Base**

Proximity to:

Highways 99
Airports Modesto City/County
Railways
Waterways
Schools La Rosa ES
Land Use ag, housing, schools/A-2-40/AG

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual; Tribal Cultural Resources; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 4; Department of Parks and Recreation; Caltrans, District 10; California Department of Education; Native American Heritage Commission; Regional Water Quality Control Bd., Region 5 (Sacramento); State Water Resources Control Board, Division of Drinking Water, District 10

Date Received 06/27/2018 **Start of Review** 06/27/2018 **End of Review** 08/10/2018

Note: Blanks in data fields result from

2.2.9 RESPONSE TO COMMENT LETTER 9 – STATE CLEARINGHOUSE

RESPONSE TO COMMENT 9-1

The commenter states that the State Clearinghouse has submitted the Draft EIR to selected state agencies for review and attaches the comments received.

The City appreciates the circulation of the Draft EIR among State agencies.

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2.2.10 RESPONSE TO PLANNING COMMISSION WORKSHOP VERBAL COMMENTS

The City held a public workshop on August 6th, 2018 before the Planning Commission to summarize the Draft EIR and invite comments and questions from the Planning Commission and public. The verbal comments offered at this public workshop are summarized below, along with responses.

RESPONSE TO COMMENT 10-1

Commissioner Johnson asked whether the School District knew that the area adjacent to the school sites was planned for development when the schools were constructed.

When the schools were developed, the sites were surrounded by existing development in the City and land planned for urban land uses in the previous 1997 General Plan (previous to the recent update). It is the City's understanding, based on discussions and documentation developed at the time, that the School District understood that the school sites and adjacent lands were all in the City's Primary Sphere of Influence and, as such, would be developed in the City of Ceres.

RESPONSE TO COMMENT 10-2

Commissioner Del Nero asks whether the Specific Plan streets would be built by the project or the School District.

Streets are likely to be a cost of development, and this is the way the Financing Plan was developed. In addition, the City secured a Safe Routes to Schools grant for improvements along Whitmore Avenue that will add sidewalks and would benefit the Specific Plan and the schools.

RESPONSE TO COMMENT 10-3

Commissioner Condit asked about whether the project will require the development of any new schools.

The Ceres Unified School District Superintendent, Dr. Siegel, responded that this probably would not cause another school to be built, and that the School District could probably manage it with the developer fees and such, which are designed to mitigate the impacts of new students, by either adding capacity at campuses or using capacity that the School District already has at other campuses.

It is unknown at this time whether La Rosa Elementary School and the Central Valley High School would have sufficient capacity to accommodate the students generated by the Specific Plan. However, as stated in Impact 3.13-3, La Rosa Elementary School is operating below design capacity, while Central Valley High School is exceeding its design capacity (pages 3.13-31 and 32 of the Draft EIR). Developer fees are committed to payments on leased portable buildings, placing of new relocatables, and repayment of debt for facilities, in addition to matching funds for future projects (page 3.13-4 of the Draft EIR). As stated in Impact 3.13-3, the applicants for future projects proposed under the Specific Plan will be required to pay the State-mandated school impact fees levied at the time of development. If the CUSD determines that a new school facility is required, potential physical impacts associated with the new school facility would be the subject of further, separate environmental review that would be conducted by the CUSD. The City does not control, and cannot predict whether CUSD would add new facilities in the future, re-program existing sites, add temporary classrooms, move students between schools, or take other actions in the future based on decreases or increases in enrollment. As shown on

page 3.12-5 of the City's General Plan EIR, CUSD schools had a remaining capacity of 3,888 elementary, junior high, and high school students in the 2016-2017 school year (City of Ceres 2018).

See the Response to Comment 3-15 for a discussion of the conservative assumptions used in the Draft EIR impact analysis. Also see Responses to Comments 3-18 and 3-19.

RESPONSE TO COMMENT 10-4

Chair Smith expressed a concern about the Specific Plan funding mechanism for planned roadways.

The Specific Plan Financing Plan includes the cost of Stanford Avenue and other Specific Plan streets. The planning team had a concern about Stanford Avenue allowing high-speed travel, if it were a straight route from Moore Road to the schools. That is why the current conceptual design provides this connection, but with an offset to the north.

RESPONSE TO COMMENT 10-5

A member of the public stated that she is against approval of the Specific Plan and concerned about agricultural impacts.

The commenter's opposition to the project is acknowledged. This comment does not raise specific questions or request information that pertains to the adequacy of the Draft EIR for addressing adverse physical impacts associated with the project. However, this comment is published in this Response to Comments document for public disclosure and for decision maker consideration.

Agricultural resources impacts are addressed in Section 3.2 of the Draft EIR.

RESPONSE TO COMMENT 10-6

The Superintendent of the Ceres Unified School District stated that they hired attorneys to prepare comments, that they are concerned about traffic and safety, that previous environmental work for the junior high school paid for access to that school site, that they are concerned about the fact that the school site was developed with only one access, that they would prefer that the Specific Plan build the entire Stanford Avenue for secondary access, and that they will not use impact fees to assist with the construction of this roadway.

See the Responses to Comments 3-5 through 3-14.

RESPONSE TO COMMENT 10-7

A member of the public expressed concern about safety for Moore Road and motorists using Specific Plan Area roadways, turning west on Moore Road, to avoid congested intersections along Mitchell Road.

Mitigation Measure 3.14-1b requires the Specific Plan applicant to construct a barrier at the Whitmore Avenue / Moore Road intersection to prohibit northbound left turns.

RESPONSE TO COMMENT 10-8

A member of the public expressed concern about safety for Moore Road and traffic.

Mitigation Measure 3.14-1b requires the Specific Plan applicant to construct a barrier at the Whitmore Avenue / Moore Road intersection to prohibit northbound left turns. Please see also the Responses to Comments 3-5 through 3-14.

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3 ERRATA

Chapter 3 identifies revisions to the Draft EIR. The changes are presented in the order in which they appear and identified by page number. Text deletions are shown in strikeout (~~strikeout~~) and additions are underlined (underlined). These edits provide clarifications or additional supportive information and do not change the analysis or conclusions of the Draft EIR.

TABLE OF CONTENTS

On page ix of the Table of Contents, the acronym for CalRecycle has been corrected as follows:

CalRecycle	~~California Integrated Waste Management Board~~ California Department of Resources Recycling and Recovery

CHAPTER 3, ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

SECTION 3.13, PUBLIC SERVICES AND UTILITIES, INCLUDING RECREATION AND ENERGY

On page 3.13-14 of the Draft EIR, the following revision was incorporated under "Existing Conditions":

> Solid waste is collected in the city and disposed of at either the Fink Road Landfill, located at 4000 Fink Road, ~~and then processed~~ or at the Stanislaus Resource Recovery Facility, located at 4040 Fink Road, which is a waste-to-energy (WTE) facility.

On page 3.13-14 of the Draft EIR, the following revision was incorporated under "Existing Conditions:"

> The Fink Road Landfill is a Class II and Class III municipal landfill that is permitted to accept general residential, commercial, and industrial refuse for disposal, including municipal solid waste, construction and demolition debris, green materials, agricultural debris, asbestos, and ash. According to ~~CalRecycle~~ the County's 5-year permit review report, the Fink Road Landfill has a maximum permitted throughput of 24,000 tpd and has a total maximum permitted capacity of 14.6 million cubic yards (SCS Engineers 2017). The Fink Road Landfill has a remaining capacity of approximately 8.2 million cubic yards (CalRecycle 2016b).
>
> ~~CalRecycle~~ The County previously estimate~~s~~d that the Fink Road Landfill ~~has~~ had a capacity until 2023. However, based on lower disposal rates, the County recently revised its projections for the life of the landfill to ~~2029~~ 2028 for Class III waste and ~~2043~~ 2041 for Class II (~~Stanislaus County 2014~~ SCS Engineers 2017). In addition, the County has initiated plans for an expansion and reconfiguration of the existing facility to extend its useful life by another 10 to 15 years beyond the revised projections (~~Stanislaus County 2009:2-1~~ SCS Engineers 2017). The expansion project would be complete prior to the scheduled original closure date of the landfill.

On page 3.13-14 of the Draft EIR, the following revision was incorporated under "Existing Conditions":

> The California Integrated Waste Management ~~Board~~ Act of 1989 requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills.

On page 3.13-14 of the Draft EIR, the following revision was incorporated under "Existing Conditions":

> The California Integrated Waste Management ~~Board~~ Act of 1989 requires local agencies to implement source reduction, recycling, and composting that would result in a minimum of 50 percent diversion of solid waste from landfills, thereby extending the life of landfills. For 2015, the target solid waste ~~generation~~ disposal rate for ~~Stanislaus County~~ Stanislaus County Regional Solid Waste Planning Agency area is 6.3 pounds per day (ppd) per resident in order to achieve a 50 percent rate of diversion, and the actual measured ~~generation~~ disposal rate was 4.5 ppd per resident, which shows the actual diversion rate was exceeding 50 percent target rate ~~is approximately 1.8 ppd less than the target solid waste generation disposal rate~~ (CalRecycle 2016c).

On page 3.13-14 of the Draft EIR, the following revision was incorporated under "Regulatory Framework":

> Chapter ~~7~~4, Section ~~708~~408, of the 2016 CALGreen Code requires all construction contractors to reduce construction waste and demolition debris by ~~50~~65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both. In addition, the 2016 CALGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

4 REFERENCES

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California Department of Resources Recycling and Recovery (CalRecycle). 2016b. Jurisdictional Diversion/Disposal Rate Report. Stanislaus County Regional Solid Waste Planning Agency. Stanislaus County. http://www.calrecycle.ca.gov/LGCentral/Reports/DiversionProgram/JurisdictionDiversionDetail.aspx?JurisdictionID=616&Year=2015. Accessed: October 26, 2016.

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SCS Engineers. 2017 (March). Five-Year Permit Review Fink Road Landfill Stanislaus County, California. Prepared for Stanislaus County. Available: file:///C:/Users/kingj1/Downloads/SCS%20FRL%20Five%20Year%20Permit%20Review%20Report_SCS_031017.pdf. Accessed August 30, 2018.

Westbrook, Tom. City of Ceres, Director of Community Development. Email correspondence with Jenifer King of AECOM regarding the increased demand for fire services. October 3, 2017.

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APPENDIX A

Revised Traffic Impact Report

TRAFFIC IMPACT ANALYSIS

FOR

WHITMORE RANCH SPECIFIC PLAN
Ceres, CA

Prepared For:

AECOM
2020 L Street, Suite 400
Sacramento, CA 95811

Prepared By:

KD Anderson & Associates, Inc.
3853 Taylor Road, Suite G
Loomis, CA 95650
(916) 660-1555

~~August 29~~October 2, 2018

0090-08

Whitmore Ranch SP 10~~8-29~~-2018.rpt

TRAFFIC IMPACT ANALYSIS FOR
WHITMORE RANCH SPECIFIC PLAN

TABLE OF CONTENTS

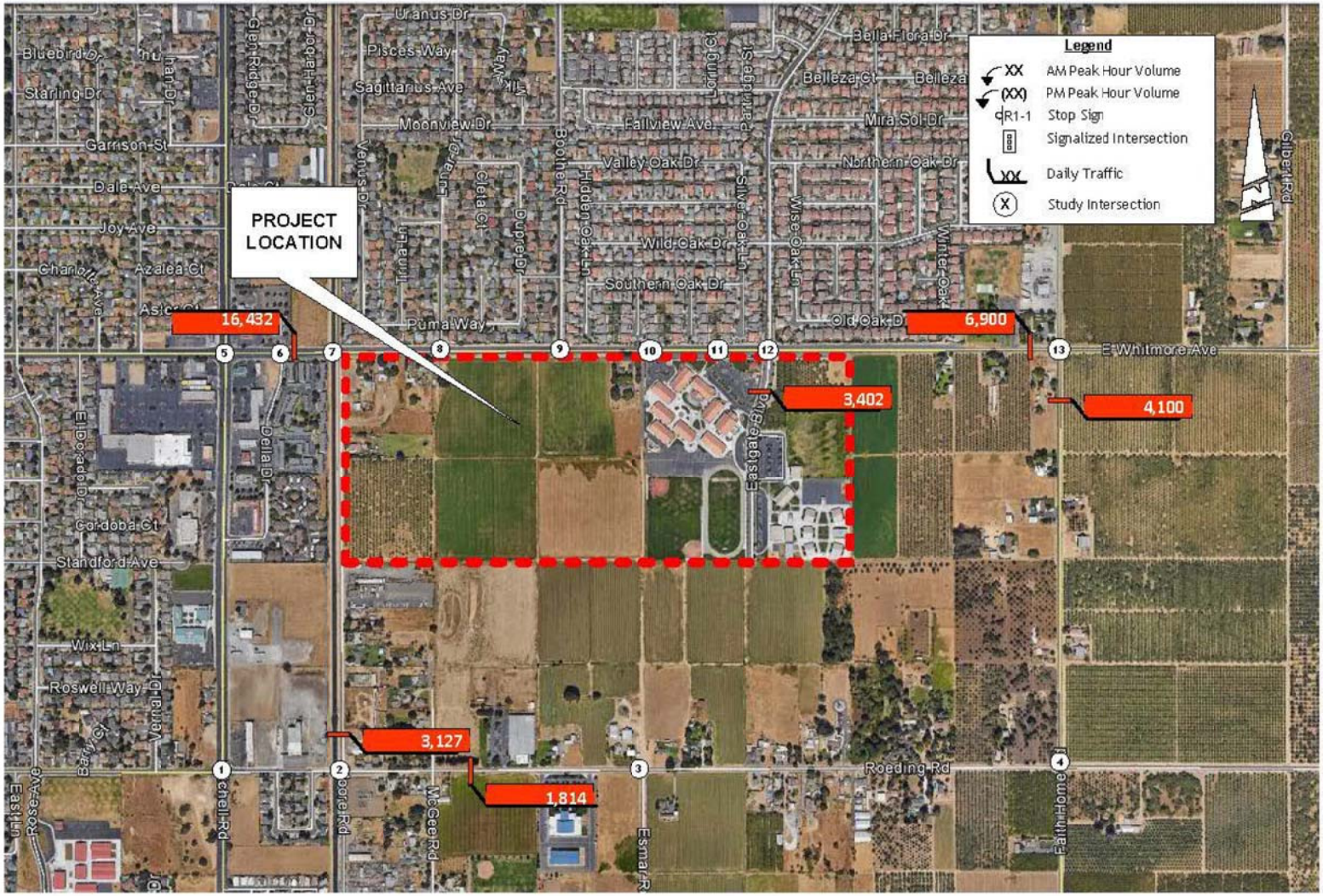
TRAFFIC IMPACT ANALYSIS FOR
WHITMORE RANCH SPECIFIC PLAN
Ceres, CA

INTRODUCTION

This report summarizes **KD Anderson & Associates** analysis of the potential traffic impacts associated with development of the **Whitmore Ranch Specific Plan (WRSP)** in Ceres, California. The WRSP will guide development of approximately 94 acres of residential and public uses on property that is located south of Whitmore Avenue between the TID Ceres Main Canal and La Rosa Elementary School. The project site is located regionally in Figure 1, and the land use plan is Figure 2.

The purpose of this analysis is to document current and future traffic conditions in the area of the WRSP and to identify the traffic impacts associated with development of the WRSP in a manner that is consistent with City of Ceres and CEQA guidelines. This report includes evaluation of existing circulation conditions in the area based on Levels of Service associated with current daily and a.m. / p.m. peak hour traffic volumes, and facilities for alternative transportation modes have also been identified. The extent to which circulation system improvements are already needed has been determined. The general characteristics of the proposed project have also been determined based on an analysis of the trip generation that may be associated with proposed land uses. WRSP trips were assigned to the study area street system~~,~~ and resulting Levels of Service were compared to current conditions in order to identify the impacts of WRSP development alone. The project accommodates a new roadway~~new roadway~~ that would extend easterly across the southern boundary of the adjoining Chavez Jr. HS site to Eastgate Blvd. The connection to Eastgate Blvd would be part of a route that would be available through the WRSP to Moore Road, although a single direct roadway is not envisioned. B~~and b~~ecause questions have been raised regarding the timing for completion~~ of that road~~, traffic conditions with and without the connection to Eastgate Blvd have been assessed.

The cumulative impacts of other development have also been assessed. A short-term future condition that assumes occupancy of other approved by unconstructed projects was identified, and project impacts were also evaluated within the context of this baseline with and without the Eastgate Blvd connection. Cumulative traffic impacts were also evaluated assuming implementation of programmed circulation system improvements and continuing development under the pending Ceres General Plan Update. Mitigation measures that will be needed to address both project specific and cumulative impacts were identified.



VICINITY MAP AND STUDY INTERSECTION INDEX

KD Anderson & Associates, Inc.
Transportation Engineers

0090-08 RA 8/29/2018

figure 1

Source: AECOM 2016

LAND USE PLAN

figure 2

EXISTING SETTING

Existing Street System

Today regional access to Whitmore Ranch Specific Plan (WRSP) area is provided by State Route 99, by several City of Ceres arterial streets and by rural roads in the unincorporated area of Stanislaus County. State Route 99 connects the project with the Modesto urban area to the north and the Turlock area to the south. Today access to the state highway occurs at the Mitchell Road interchange south of the project site, at the El Camino Avenue ramps in downtown Ceres and at the Whitmore Avenue interchange to the west. Mitchell Road provides access to central Modesto north of the Tuolumne River. Roeding Road extends east of downtown Ceres through the project site. Other local and collector streets link the area with residential neighborhoods. Additional information regarding these facilities is presented in the text that follows.

State Highway 99 (SR 99) is the major north-south route serving Ceres and Stanislaus County as a whole. SR 99 extends through the Central Valley from a junction on Interstate 5 south of Bakersfield to the Red Bluff area of Tehama County.

In the immediate vicinity of the project SR 99 is a 6-lane controlled access freeway with access via four interchanges.

Caltrans compiles traffic count data for the state highway system and reports this information yearly. The most recent traffic counts available from Caltrans suggest that SR 99 carries an *Annual Average Daily Traffic (AADT)* volume of about 94,000 vehicles per day (2015) in the area north of the Mitchell Road interchange and 101,500 AADT to the south.

Future plans for the state highways in this area involve the development of an expanded Mitchell Road interchange that would provide improved access to southern Ceres. The City of Ceres has selected a preferred alternative for reconstructing the SR 99 / Mitchell Road interchange that will link Service Road directly with the state highway. As a part of the project, Mitchell Road would be widened from four to six travel lanes from SR 99 to Don Pedro and Service Road would be widened to six lanes between Moffett Road and Mitchell Road.

Whitmore Avenue is an east-west Arterial street in the Ceres General Plan Circulation Element. Whitmore Avenue originates at an intersection on Carpenter Road and extends easterly for about 14 miles across SR 99 along the project site to Hughson and rural Stanislaus County. In the area of the WRSP Whitmore Avenue is a two-lane facility that is being incrementally widened to four lanes as local development occurs. Two westbound travel lanes are already provided in the area of the project, and the posted speed limits is 45 mph. A 25 mph school zone exists in the vicinity of Cesar Chavez Jr. High School and La Rosa Elementary School.

Daily traffic counts completed for this traffic study in October 2016 indicated that the current daily traffic volume on Whitmore Avenue was 16,432 vehicles per day (vpd) east of the Mitchell Road intersection, with the volume dropping to 6,900 vpd just west of Faith Home Road. The highest volume occurs in the area between Moore Road and Boothe Road with 18,320 vehicles per day.

Mitchell Road is a north-south Arterial that extends north from an interchange on SR 99 through Ceres to the Tuolumne River crossing an intersection on State Route 132 in Modesto. In the area of the project Mitchell Road is a four-lane facility with a speed limit of 45 mph. Mitchell Road is to be widened to six lanes in the future. Traffic counts made for the GPU EIR indicated that Mitchell Road carried 38,168 vpd north of Whitmore Avenue, 34,986 vpd between Whitmore Avenue and Roeding Road and 36,106 vpd south of Roeding Road.

Roeding Road is an east-west Primary Collector street that extends easterly from 6th Street near the SR 99 El Camino Avenue ramps across Mitchell Road past the project site to its eastern terminus on Tully Road south of Hughson. In the area of the project Roeding Road is a two-lane rural facility with a prima facie speed limit of 55 mph. Traffic counts conducted for this traffic study in October 2016 indicated that Roeding Road carried 1,814 vpd in the area of the project east of Moore Road.

Faith Home Road is a north-south street serving eastern Ceres and rural Stanislaus County. Faith Home Road extends south from an intersection on Hatch Road near the Tuolumne River to an interchange on SR 99 before continuing to Merced County. Faith Home Road is designated an expressway in the Ceres General Plan Circulation Element, but today Faith Home Road is a rural two-lane road, and the prima facie speed limit is 55 mph. Traffic counts conducted for the GPU EIR indicated that the road carries 4,100 vpd in the area of the project.

Esmar Road and **Boothe Road** are designated Primary Collector streets in the City of Ceres General Plan Circulation Element. Today Boothe Road extends as a two-lane road from an intersection on Hatch Road south to Whitmore Avenue. Based on the peak hour traffic volumes observed today the daily traffic volume on Boothe Road is estimated to be 4,600 vehicles per day. Today Esmar Road originates at an intersection on Roeding Road and continues southerly as a two-lane rural road to an intersection on Rohde Road near SR 99. The Circulation Element indicated that these two roads will be linked via a new road constructed from Whitmore Avenue to Roeding Road across the project site.

Eastgate Boulevard is a north-south two-lane secondary collector street that traverses the neighborhood north of the proposed project and extends south of Whitmore Avenue to provide access to the Ceres Unified School District's La Rosa Elementary School and Cesar Chavez Junior High School. Ultimately the road will continue to Roeding Road. Traffic counts conducted for this analysis indicated that Eastgate Blvd carried 3,402 vehicles per day south of Whitmore Avenue.

Study Area intersections

The text which follows describes the configuration and controls of study area intersections.

The **Mitchell Road / Roeding Road intersection** is controlled by a traffic signal. The Roeding Road approaches are each single lanes, and the intersection operates with "permitted" phasing on these legs. The City has recently awarded a contract for an improvement project that will widen Roeding Road to provide separate left turn lanes on each approach and provide protected turn phasing. Separate left turn lanes are available on the Whitmore Avenue approaches. With the improvement project there will be sidewalks and handicap ramps on each corner and crosswalks

at this intersection.

The **Roeding Road / Moore Road intersection** is located immediately east of the TID Canal and is controlled by an all-way stop. Each approach has a single travel lane. The presence of the canal limits the size of curb returns on the western corners (i.e., 15 feet). The Class I Bike path along the canal ends at Roeding Road, but there are no crosswalks or sidewalks at the intersection. Another construction phase to extend Class I Bike path from Roeding Road to Service Road began in December 2017.

The **Roeding Road / Esmar Road intersection** is a "tee" controlled by a stop sign on the northbound Esmar Road approach. Each approach is a single travel lane. There are no sidewalks or crosswalks at this rural intersection.

The **Roeding Road / Faith Home Road intersection** is controlled by an all-way stop. Each approach is a single lane, but wide curb returns capable of accommodating truck traffic have been installed. There are no sidewalks or crosswalks at this rural intersection.

The **Mitchell Road / Whitmore Avenue intersection** is controlled by a traffic signal. Both streets have two through travel lanes in each direction, as well as separate left turn lanes. Separate right turn lanes are provided on the Mitchell Road approaches. Sidewalk exists on each corner with handicap ramps, and a crosswalk exists on each leg of the intersection. Each corner of the intersection has been developed.

The **Whitmore Avenue / Della Drive intersection** provides access to retail uses adjoining the Whitmore Avenue corridor. The intersection is controlled by a stop sign on the northbound Della Drive approach, and the northern leg is a driveway serving a local retail use. Westbound Whitmore Avenue has two travel lanes and a separate left turn lane. The eastbound approach has two through lanes but the roadway transitions to a single eastbound lane in the area east of the intersection. A Two-Way Left-Turn lane is striped west of the intersection. Sidewalks are present on both sides of the intersection, but there are no crosswalks.

The **Whitmore Avenue / Moore Road intersection** is located immediately east of the TID canal. This "tee" intersection is controlled by a stop sign on the northbound Moore Road approach. There are two through lanes on westbound Whitmore Avenue and a single eastbound lane is available. Whitmore Avenue west of the intersection has been widened to its full four-lane width across the canal, but the east side of the intersection has not. The route of the TID Canal Trail crosses Whitmore Avenue at a marked crosswalk that is immediately adjacent to Moore Road, and the limit line on the northbound approach extends into the intersection. As a result the space available for westbound left turns onto southbound Moore Road is very limited. An appreciable number of westbound left turns occur during peak hours as Moore Road is used as an alternative north-south route in the area between Mitchell Road and Faith Home Road.

The **Whitmore Avenue / Lunar Drive intersection** is a "tee" controlled by a stop sign on the southbound Lunar Drive approach. A separate eastbound left turn lane is provided on Whitmore Avenue, and there are two westbound travel lanes. The Lunar Drive approach is a single lane. There are sidewalks on the north side of the intersection but no crosswalks.

The **Whitmore Avenue / Boothe Road intersection** is a "tee" controlled by a stop sign on the southbound approach. A separate eastbound left turn lane is provided on Whitmore Avenue, and there are two westbound travel lanes. The Boothe Road approach is a single lane. There are sidewalks on the north side of the intersection but no crosswalks.

The **Whitmore Avenue / Eastgate Blvd intersection** is controlled by a traffic signal. The Whitmore Avenue and northbound Eastgate Blvd approaches have separate left turn lanes. The eastbound approach has been widened to facilitate right turns, but a full turn lane is not provided. Sidewalk and handicap ramps exist on each corner, and each leg has crosswalks.

The **Whitmore Avenue / Faith Home Road intersection** is controlled by an all-way stop. Each approach is a single lane, but wide curb returns capable of accommodating truck traffic have been installed. There are no sidewalks or crosswalks at this rural intersection.

Existing Traffic Volumes

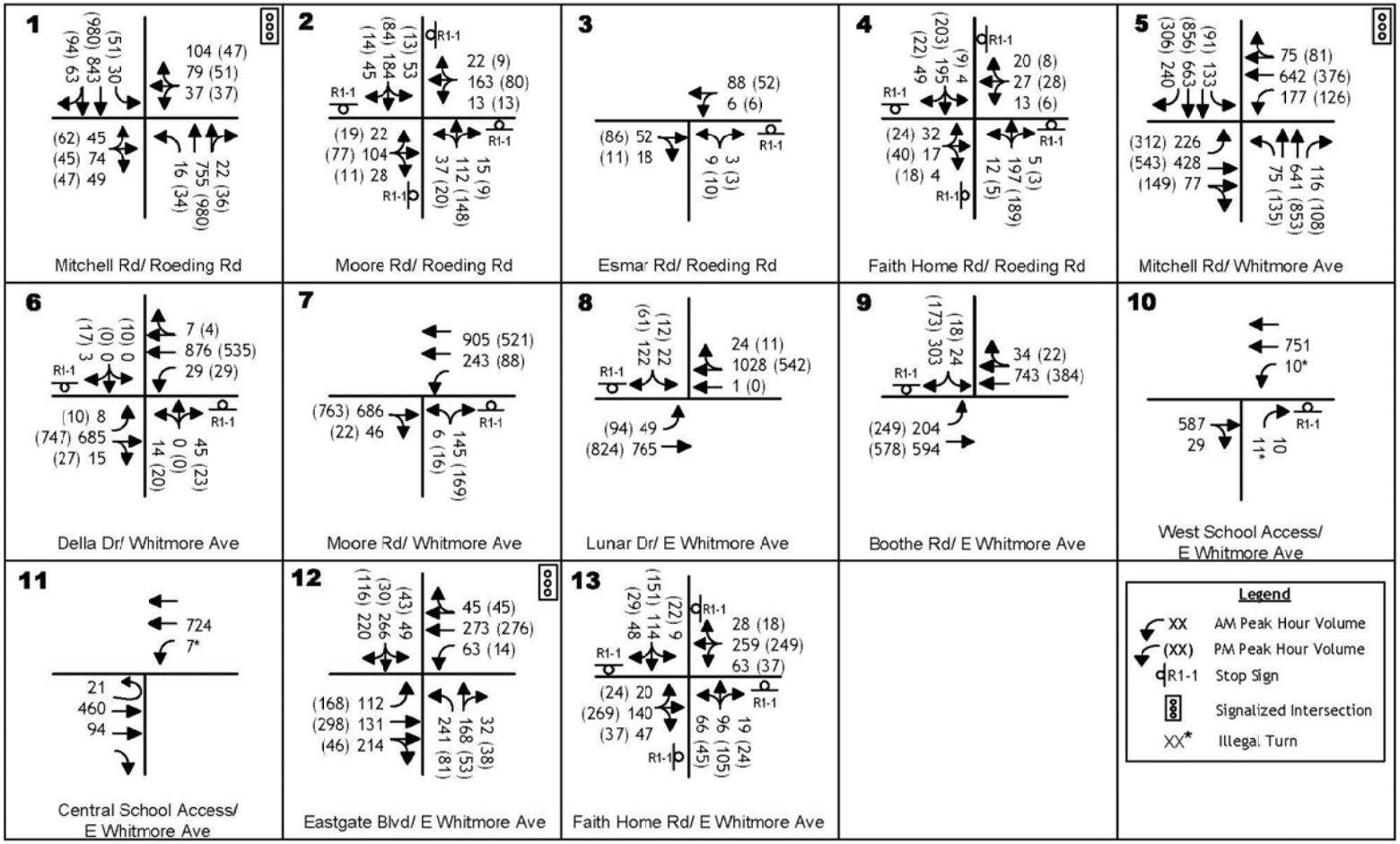
To quantify existing traffic conditions, a base of current peak hour traffic volume information was assembled from review of other recent traffic studies and new traffic counts completed by the consultant. New traffic counts were made at most locations in October 2016 when area schools were in session. Data for the Whitmore Avenue / Mitchell Road and Roeding Road / Mitchell Road intersections was obtained from the City's General Plan Update. The study intersections were noted in Figure 1, and applicable a.m. and p.m. peak hour traffic counts are summarized in Figure 3. Current information regarding the number of lanes and traffic control devices are also presented in that Figure 3.

Level of Service Calculation

To quantitatively evaluate traffic conditions and to provide a basis for comparison of operating conditions with and without project generated traffic, Levels of Service were determined at study area intersections and roadway segments.

"Level of Service" (LOS) is a quantitative measure of traffic operating conditions whereby a letter grade "A" through "F" is assigned to an intersection. LOS "A" through "F" represents progressively worsening traffic conditions. The characteristics associated with the various LOS for intersections are presented in Table 1. The City of Ceres has identified LOS C as the minimum standard for secondary collectors and local streets and has established LOS "D" as the minimum standard for major roadways such as primary collectors, arterials, expressways and freeways.

Intersection Levels of Service. Levels of Service were calculated for this study using the methodology contained in the 2010 Highway Capacity Manual (HCM) using Synchro software. The overall Level of Service for intersections was determined based on the average length of delays for all motorists at signalized intersections and all-way stop controlled intersections. At un-signalized intersections controlled by side-street stop signs the reported Level of Service is that associated with the "worst case".



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EXISTING TRAFFIC VOLUMES AND LANE CONFIGURATIONS

figure 3

TABLE 1
LEVEL OF SERVICE DEFINITIONS

Level of Service	Signalized Intersection	Unsignalized Intersection	Roadway (Daily)
"A"	Uncongested operations, all queues clear in a single-signal cycle. Delay ≤ 10.0 sec	Little or no delay. Delay ≤ 10 sec/veh	Completely free flow.
"B"	Uncongested operations, all queues clear in a single cycle. Delay > 10.0 sec and ≤ 20.0 sec	Short traffic delays. Delay > 10 sec/veh and ≤ 15 sec/veh	Free flow, presence of other vehicles noticeable.
"C"	Light congestion, occasional backups on critical approaches. Delay > 20.0 sec and ≤ 35.0 sec	Average traffic delays. Delay > 15 sec/veh and ≤ 25 sec/veh	Ability to maneuver and select operating speed affected.
"D"	Significant congestions of critical approaches but intersection functional. Cars required to wait through more than one cycle during short peaks. No long queues formed. Delay > 35.0 sec and ≤ 55.0 sec	Long traffic delays. Delay > 25 sec/veh and ≤ 35 sec/veh	Unstable flow, speeds and ability to maneuver restricted.
"E"	Severe congestion with some long standing queues on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. Traffic queue may block nearby intersection(s) upstream of critical approach(es). Delay > 55.0 sec and ≤ 80.0 sec	Very long traffic delays, failure, extreme congestion. Delay > 35 sec/veh and ≤ 50 sec/veh	At or near capacity, flow quite unstable.
"F"	Total breakdown, stop-and-go operation. Delay > 80.0 sec	Intersection blocked by external causes. Delay > 50 sec/veh	Forced flow, breakdown.
Sources: 2010 Highway Capacity Manual.			

Roadway Segment Levels of Service. The Level of Service on individual roadway segments was determined based on daily traffic volume thresholds identified in the City of Ceres General Plan Update Existing Conditions report and volume / capacity thresholds for urban streets presented in the Highway Capacity Manual (1985) and resulting thresholds specific to roadway type are presented in Table 2.

TABLE 2
ROADWAY SEGMENT LEVEL OF SERVICE THRESHOLDS

Type of Roadway	Daily Capacity Per Lane[1]	Lanes	Level of Service / V/C[2]				
			A	B	C	D	E
			<0.60	<0.70	<0.80	<0.90	<1.00
Expressway	15,630						
Principal Arterial	10,625	6	38,850	45,325	51,800	58,275	64,750
Minor Arterial	9,380	4	22,350	26,075	29,800	33,525	37,250
Minor Arterial with TWLT Lane	10,000	2	12,000	14,000	16,000	18,000	20,000
Major Collector	8,750	4	21,000	24,500	28,000	31,500	35,000
Major Collector with TWLT Lane	9,380	2	11,255	13,130	15,010	16,885	18,760
Minor Collector / Local	6,250	2	7,500	8,750	10,000	11,250	12,500
Rural V/C thresholds			<0.05	<0.15	<0.25	<0.45	<1.00
Rural Road	11,250		1,125	3,375	5,625	10,125	22,500

[1]Source: City of Ceres General Plan EIR

[2] Highway Capacity Manual, 1985

Current Traffic Conditions / Levels of Service

Intersection Level of Service. Current a.m. and p.m. peak hour Levels of Service were calculated at existing study intersections (Refer to Appendix for calculation worksheets) under "Existing" conditions, and the results are presented in Table 3. In each case the observed Peak Hour Factor (PHF) has been employed to describe conditions occurring during the peak 15 minute within each hour.

As shown, with a few exceptions all study area intersections operate with Levels of Service that satisfy minimum City of Ceres standards.

The northbound approach at the **Whitmore Avenue / Moore Road intersection** operates at LOS E in the a.m. peak hour.

The southbound approach at the **Whitmore Avenue / Boothe Road intersection** operates at LOS F in the a.m. peak hour.

TABLE 3
EXISTING INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour		PM Peak Hour		Signal Warrants Met?
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	
Mitchell Road / Roeding Road	Signal	13.3	B	12.5	B	n.a.
Moore Road / Roeding Road	All-Way Stop	15.2	B	9.3	A	No
Esmar Road / Roeding Road Northbound Approach	NB Stop	9.5	A	9.4	A	No
Faith Home Road / Roeding Road	All-Way Stop	9.9	A	9.2	A	No
Mitchell Road / Whitmore Avenue	Signal	42.5	D	38.5	D	n.a.
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	19.7 12.4	C B	18.8 16.1	C C	No
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	**38.0**	**E**	33.5	D	Yes[1]
Lunar Drive / Whitmore Avenue Southbound Approach	SB Stop	29.0	D	14.6	B	Yes[1]
Boothe Road / Whitmore Avenue Southbound Approach	SB Stop	**258.8**	**F**	21.1	C	Yes
Eastgate Blvd / Whitmore Avenue	Signal	36.9	D	18.1	B	n.a.
Faith Home Road / Whitmore Avenue	All-Way Stop	15.0	B	17.1	C	No

Bold values exceed the minimum LOS standard.

(1) Although peak hour Traffic Signal Warrants may be met for these intersections, other improvements as further described in this report will result in conditions that will not require installation of a new traffic signal.

The WRSP adjoins Cesar Chavez Jr. High School and La Rosa Elementary School, and these facilities attract appreciable vehicular traffic during the periods immediately before and after the end of the school day. As is typically the case with schools, congestion created by on-site drop-off and loading activities can extend back onto the adjoining public streets. Thus traffic flow may be indicative of conditions that are poorer than would be suggested by Level of Service Analysis predicated on traffic volumes and intersection capacity. Alternatively, the congestion created by school is short term in nature and typically lasts for about 15 minutes.

Traffic Signal Warrants. The extent to which current traffic conditions at un-signalized intersection might justify a traffic signal was evaluated based on the warrants contained in the Manual of Uniform Traffic Control Devices. As noted in Table 3 the volume of traffic occurring at three intersections on Whitmore Avenue satisfy peak hour warrants. However, traffic engineers often find that traffic signals are not the preferred control when the majority of approach traffic turns right, as is the case with the existing traffic on northbound Moore Road, southbound Lunar Drive and southbound Boothe Road. The applicable traffic control strategy is discussed later in this report to address WRSP impacts.

Roadway Segment Levels of Service based on Daily Traffic Volumes. The daily traffic volumes observed on study area roads are noted in Table 4. As indicated, with one exception the study area street system carries traffic volumes that satisfy the City of Ceres' minimum LOS D standard. The exception is the segment of Whitmore Avenue from Moore Road easterly to Cesar Chavez Jr. High School along the WRSP frontage where only one eastbound lane is available. This segment operates at LOS E, which exceeds the City's LOS D minimum.

The City is pursuing a Safe Routes to School program to widen Whitmore Avenue between Moore Road and Cesar Chavez Jr High School to provide improved pedestrian and bicycle facilities. That work would also provide four lanes on Whitmore Avenue in the area of existing homes.

TABLE 4
CURRENT ROADWAY SEGMENT LEVEL OF SERVICE
BASED ON DAILY TRAFFIC VOLUME

Roadway	Location	Classification	Lanes	Daily Volume	Level of Service
Whitmore Avenue	Mitchell Rd to Della Dr	Arterial	4	16,432	A
	Della Dr to Moore Rd	Arterial	2+	16,432	D
	Moore Rd to Boothe Rd	Arterial	2+	**18,320**	**E**
	Boothe Rd to Eastgate Blvd	Arterial	2+	13,600	B
	Eastgate to Faith Home Rd	Arterial	2	6,900	A
Faith Home Road	Whitmore Ave to Roeding Rd	Rural Road	2	4,100	C
Eastgate Blvd	South of Whitmore Ave	Secondary Collector	2	3,402	A
Moore Road	Whitmore Ave to Roeding Rd	Local	2	3,127	A
Roeding Road	Moore Rd to Faith Home Rd	Collector	2	1,814	A
Bold values exceed the minimum LOS standard.					

Traffic Safety Deficiencies. The extent to which the existing layout of the study area circulation system presents operational or safety deficiencies has been considered based on consistency with current City of Ceres roadway design standards. Because the study area is transitioning from

rural Stanislaus County roads to urban city streets, many segments do not meet urban standards for lane width, curb & gutter and sidewalk etc. These deficiencies alone do not necessarily create safety or operational problems, and rural roads can safely accommodate moderate traffic volumes.

Within the study area the most noteworthy deficiency occurs at the Whitmore Avenue / Moore Road intersection near the TID Main Canal. The route of the TID Canal Trail crosses Whitmore Avenue at a marked crosswalk that is immediately adjacent to Moore Road, and the limit line on the northbound approach extends into the intersection. As a result the space available for westbound left turns onto southbound Moore Road is very limited, and when northbound traffic is waiting to turn left the southbound movement must typically be made at slow speed. An appreciable number of westbound left turns occur during peak hours as Moore Road is used as an alternative north-south route in the area between Mitchell Road and Faith Home Road.

Intersection design is similarly a constraint at the Moore Road / Roeding Road intersection since the canal is very close to the intersection. However, while the intersection is narrow current traffic volumes at this all-way stop controlled location do not create the issues existing on Whitmore Avenue.

Pedestrian / Bicycle Facilities

Although pedestrian and bicycle facilities do not exist along the WRSP frontage, sidewalks and bicycle lanes have been constructed as eastern Ceres has been developed. Sidewalk exists on the north side of Whitmore Avenue from the Mitchell Road intersection to a point midway between Eastgate Blvd and Faith Home Road. Sidewalk exists on the south side of the street in the immediate vicinity of the two CUSD schools and in the area between Mitchell Road and Moore Road. Sidewalks are also available on Eastgate Blvd and on the other streets serving the Eastgate Community north of Whitmore Avenue opposite the WRSP site.

Today school age pedestrians walk along the south side of Whitmore Avenue where no sidewalks exist on their way to Cesar Chavez Jr. High School and La Rosa Elementary School. The potential exists for conflicts between motor vehicles, bicycles and pedestrians in this area where paved shoulder and dirt path are available. The City of Ceres was awarded a Safe Routes to School Program to develop improvements in this area, with anticipated construction in the summer of 2018.

Bicycle facilities have been installed at many locations in Ceres and are planned for expansion as the community is developed. The 2013 StanCOG Non-Motorized Transportation Master Plan guides bicycle planning in this area.

Chapter 1000 of the Caltrans *Highway Design Manual* defines three classes of bicycle facilities and details the minimum requirements for those facility types:

- Class 1 Bicycle Paths - a paved right of way completely separated from any street or highway.
- Class 2 Bicycle Lanes - a striped and stenciled lane for one-way travel on a street or highway.

- Class 3 Bicycle Routes - a typical roadway identified as a preferred bicycle route with signage. They may also include shared use lane markings, "SHARE THE ROAD" signage, or wide shoulders.

In the StanCOG Plan, a Class 3.5 bicycle route designation is also used. Class 3.5 facilities indicate a Class 3 bicycle route, as defined by Caltrans, with wide shoulders, typically four to eight feet in width. Class 3 Share the Lane indicates Class 3 bicycle routes, as defined by Caltrans, with "SHARE THE ROAD" signage, typically on narrow, rural roadways.

In the area of the WRSP a Class 1 Bike Path exists along the TID Main Canal adjoining the WRSP. This path links Hatch Road on the north with the southern City limits and current construction will extend the path to Service Road.

Class 2 Bike Lanes exist on Boothe Road north of Whitmore Avenue and on Whitmore Avenue west of Moore Road. The StanCOG plan indicates that Class 2 bike lanes should be developed on Eastgate Blvd north of Whitmore Avenue and on Whitmore Avenue east of Moore Road to Faith Home Road.

Transit Facilities

The Ceres area is served by various transit providers. Stanislaus Regional Transit (StaRT), Ceres Dial-A-Ride (CDAR), Ceres Area Transit (CAT), and Modesto Area Express (MAX) provide bus service in Ceres. The agencies have bike-rack equipped bus fleets. Dial-A-Ride services are provided on a first-come, first-served basis.

City of Ceres fixed route service "CAT" is designed to meet various transit needs of the community. The CAT route covers most of the City from 6:15 a.m. to 6:10 p.m. and runs along a designated route that extends towards the WRSP as far as the Whitmore Avenue / Mitchell Road intersection.

Ceres Dial-A-Ride is an on-demand, shared ride public transportation system available to all members of the public. The WRSP is included in its service area.

Stanislaus Regional Transit (StaRT) programs also connect to Ceres. The developed areas of Ceres are accessed by fixed route service (Route 10 Express and Route 15). Route 15 reaches the corner of Whitmore Avenue / Mitchell Road.

The WRSP is also within the coverage area for Stanislaus Regional Transit's **Turlock – Modesto Runabout.** Runabouts are a transit service that combines designated fixed stops (like a fixed route) and curb-to-curb service (like a dial-a-ride). Passengers can catch the service at the designated fixed stops without having to phone ahead and book a ride. However, those passengers can only be dropped off at other designated fixed stops. For those passengers that want curb-to-curb service, it is necessary to call ahead and book a ride.

The City of Ceres Public facilities fee program includes the cost of bus pull-outs at the Whitmore

Avenue / Boothe Road intersection.

PROJECT CHARACTERISTICS

Trip Generation

The amount of traffic generated by development of the WRSP has been estimated based on the trip generation characteristics of planned uses. Table 5 presents the trip generation rates employed for this analysis. Rates for residential uses were drawn from the *Institute of Transportation Engineers (ITE)* publication *Trip Generation, 9th Edition.*

TABLE 5
TRIP GENERATION RATES

Land Use	Unit	Trip Per Unit						
			AM Peak Hour			PM Peak Hour		
		Daily	In	Out	Total	In	Out	Total
Single Family Residential	Dwelling	9.52	0.19	0.56	0.75	0.63	0.37	1.00
Multiple Family Residential	Dwelling	6.65	0.10	0.41	0.51	0.40	0.22	0.62
Parks	Acre	1.89	0.10	0.00	0.10	0.10	0.10	0.20
Middle/Junior High School	Student	1.62	0.30	0.24	0.54	0.08	0.08	0.16
Elementary School	Student	1.29	0.25	0.20	0.45	0.07	0.08	0.15

As shown in Table 6, new development of the WRSP could result in about 3,749 daily vehicle trips. During peak traffic hours the WRSP area may generate 294 a.m. peak hour trips and 382 p.m. peak hour trips.

The two existing schools located at the eastern end of the WRSP already generate trips that are part of the background traffic counts on study area roads. Based on ITE rates, these schools could be expected to be generating roughly 1,878 daily trips (½ inbound and ½ outbound) with 646 trips in the a.m. peak hour and 202 trips in the p.m. peak hour. However, Eastgate Blvd is the primary access to the schools, and that street carries 3,402 daily trips, with 984 trips in the a.m. peak hour and 262 trips in the p.m. peak hour. Adding in the traffic volumes observed at the school access, the two schools appear to be generating about 3,960 daily trips and 1,145 a.m. peak hour trips.

TABLE 6
WHITMORE RANCH SPECIFIC PLAN TRIP GENERATION

Land Use	Quantity	Trips						
		Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
New Development								
SF Residential (LDR)	196 du's	1,866	37	110	147	123	73	196
SF Residential (MDR)	85 du's	809	16	48	64	54	31	85
MF Residential (HDR)	160 du's	1,064	16	66	82	64	35	99
Parks/ Open Space	5.2 acres	10	1	0	1	1	1	2
New Development Subtotal		3,749	70	224	294	242	140	382
Existing Development								
Junior High School	657 students	1,064	197	158	355	52	53	105
Elementary School	646 students	814	162	129	291	45	52	97
ITE Existing Development Subtotal		1,878	359	287	646	97	105	202
Observed Existing Development		3,960	683	462	1,145			

Planned Improvements

Consistent with City policy development in the WRSP will be required to install frontage improvements as development occurs. This will include widening of Whitmore Avenue to its ultimate 4-lane section from Moore Road to Cesar Chavez Jr. High School. The WRSP internal street system will be constructed, including extensions of Lunar Drive and Boothe Road south of Whitmore Avenue. A new local street will be constructed along the eastern limit of the new residential area abutting Cesar Chavez Jr. High School, and this road will use the existing western school access on Whitmore Avenue. Internal streets will also connect to Moore Road, and Moore Road will be improved as part of the project. Development in the WRSP will be accompanied by portions of a new east-west secondary collector street (Stanford Avenue) that will connect to Moore Road, and an extension of Stanford Avenue from the project to Eastgate Blvd along the south end of Cesar Chavez Jr. High School is included in WRSP's improvements. However because the timing for completion of the Stanford Avenue extension has been questioned, this analysis considers conditions with and without the extension.

Trip Distribution and Assignment

Distribution. The regional distribution of the new trips generated by the WRSP will reflect the project's location on the east end of the urbanized Ceres area. The distribution of project trips has been determined from review of existing local traffic patterns as well as consideration of

traffic patterns suggested by the City of Ceres General Plan Update traffic model. The distribution pattern identified in the school's EIR was assumed related to the redistribution of existing school traffic. Figure 4 and Table 7 present the assumed distribution of project trips under "Existing plus Project" conditions.

The relationship between new residential development and adjoining schools has been considered in developing the a.m. peak hour distribution assumptions. Because the WRSP provides ample connections to the schools, it is anticipated that most school age children will be able to walk or ride bicycles to La Rosa Elementary School and Cesar Chavez Jr. High School. However, some parents are still likely to drive onto the school campuses to drop-off or load students as a portion of the project's a.m. peak hour trips are likely to be made by first stopping at or near the adjoining schools as part of a primary trip to a regional destination noted above.

This interaction has been assessed assuming typical "per residence" yield factors for Jr High and Elementary schools, and the WRSP could generate 240 students. At the ITE trip rates student travel could result in 113 trips. Of that total, some would be primary trips cited earlier but most would be drop-off trips that continue to other destinations.

TABLE 7
REGIONAL TRIP DISTRIBUTION ASSUMPTIONS

Direction	Route	Percentage of Trips	
		AM Peak Hour	PM Peak Hour
North	Mitchell Road beyond Whitmore Avenue	17½%	20%
	Eastgate Blvd	5%	5%
	Faith Home Road	2½%	2½%
East	Whitmore Avenue beyond Faith Home Road	9%	9%
	Roeding Road beyond Faith Home Road	1%	1%
	Local Schools	5%	0%
South	Mitchell Road beyond Roeding Road	15%	15%
	Faith Home Road beyond Roeding Road	2½%	2½%
West	Whitmore Avenue beyond Mitchell Road	37½%	40%
	Roeding Road beyond Central Avenue	5%	5%
Total		100%	100%

Trip Assignment. Project trips were assigned to the local area street system under the distribution assumptions presented above and the access assumptions described previously based on the "least time path" available from various locations within the WRSP area. The resulting "project only" trip assignment for residentially generated traffic alone is presented in Figure 5.

A portion of the project's a.m. peak hour trips are likely to be made by first stopping at or near the adjoining schools as part of a primary trip to a regional destination noted above. These trips may reach the Eastgate Blvd or parents may elect to drop off students on WRSP streets adjoining the school. If Stanford Avenue is extended most drop-off traffic would be on that route. Figure 6 illustrates the "project only without Stanford Avenue".

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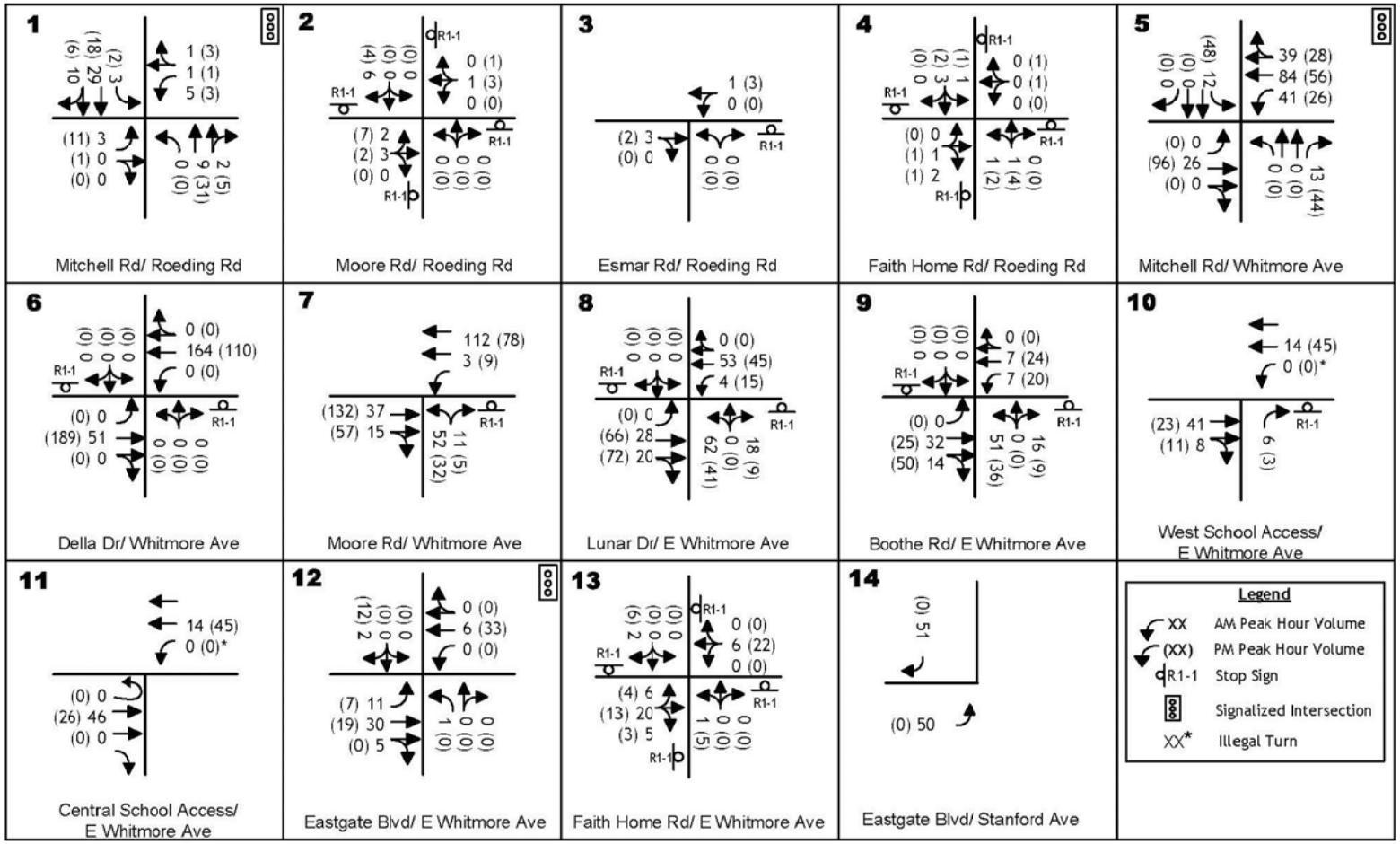
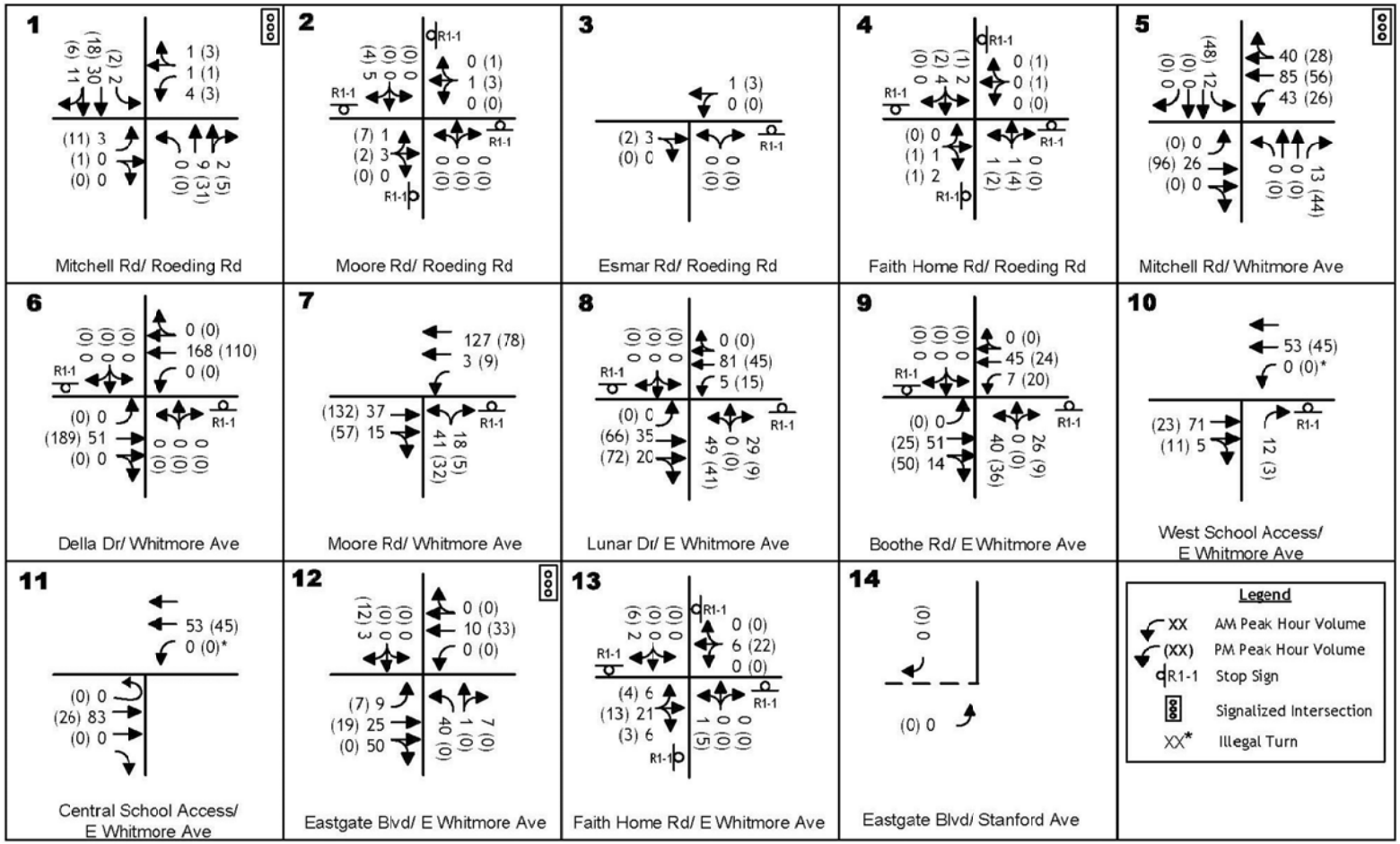
PROJECT TRIP DISTRIBUTION

figure 4



PROJECT ONLY TRAFFIC VOLUMES AND LANE CONFIGURATIONS



PROJECT ONLY NO STANFORD AVENUE CONNECTION
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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figure 6

REGULATORY SETTING

City of Ceres General Plan

The City of Ceres General Plan identifies policies related to transportation and traffic standards.

City of Ceres Public Facility Fee (PFF)

The City of Ceres has adopted Public Facility Fees that will be applied to the proposed project. The current fees are based on the Public Facilities Fee Nexus Study, June 14, 2010, which includes costs for a variety of public facilities that are included in the fee. In the area of the proposed project the PFF includes these improvements:

TABLE 8
CERES TRANSPORTATION FEE (PFF) PROJECTS

Street	Location	Improvement
Mitchell Road	Hatch Road to Whitmore Avenue	Whitmore Avenue Traffic signal modification and limited widening to 6-lanes
Mitchell Road	Whitmore Avenue to Service Road	Widening to 6-lanes
Faith Home Road	Tuolumne River to Hatch Road	Widening to 4-lanes
Faith Home Road	Hatch Road to Whitmore Avenue	Widening to 4-lanes Traffic Signal at Whitmore Avenue
Faith Home Road	Whitmore Avenue to Service Road	Widening to 4-lanes Traffic Signal at Roeding Road
Whitmore Avenue	Central Avenue to Mitchell Road	Widening road – (completed)
Whitmore Avenue	Mitchell Road to Faith Home Road	Widening to 4-lanes along existing development Traffic signal at Boothe Road Bus Turnouts at Boothe Road
Public Facilities Fee Nexus Study for the City of Ceres, PMC, June 14, 2010		

City of Ceres Standards of Significance

The City of Ceres has determined that the proposed project would have a significant impact to transportation and traffic if the project would:

- Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or reduction in Level of Service), either during the plus project condition, or the cumulative plus project condition.

- Exceed, either individually or cumulatively, a Level of Service standard established by the City of Ceres or Caltrans for designated roads or highways.

Roadways/Signalized Intersections: The project is considered to have a significant effect if it would:

- Cause deterioration of a signalized intersection from LOC C for secondary collectors and local streets or LOS D for primary collectors, arterials, expressways and freeways (or better) to LOS E or LOS F, or an increase in the service volume of any approach by 5 percent or more for a signalized intersection operating at LOS E or LOS F under Baseline (Existing) Conditions, or an increase in average delay of 5 or more seconds for a signalized intersection operating at LOS E or LOS F under Baseline (No Project) conditions.

- Cause deterioration of a controlled movement at an un-signalized intersection from LOS D (or better) to LOS E or LOS F, or at intersections where a controlled movement already operates at LOS E or F, one of the following:

    1. Project traffic results in satisfaction at the peak hour volume traffic signal warrant;
    2. Project traffic increases minor movement delay by more than 30 seconds; or
    3. Where the peak hour signal warrant is met without the project traffic and delay cannot be estimated, project increases traffic by 10 or more vehicles per lane on the controlled approach during the peak hour.

- The project, or any project-related mitigation measures, disrupts existing transit services or facilities. This includes disruptions caused by proposed project driveways on transit streets, impacts to transit stops/shelters, and impacts to transit operations from traffic improvements proposed or resulting from the project.

- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

- Result in inadequate emergency access.

- Result in inadequate parking capacity.

- Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

Stanislaus County General Plan

The study area includes portions of the Stanislaus County circulation system outside of the current City limits of Ceres but within the City's Sphere of Influence. County policies are noted in the text which follows.

Policy. For study roadway segments that are within the jurisdiction of Stanislaus County, a separate set of criteria determines the acceptable operating standards. According to Policy 2.1 from the Circulation Element of the Stanislaus County General Plan, originally adopted in 1987 and most recently revised in 2000, the minimum acceptable operating standards has been determined as follows:

- The County shall maintain LOS C or better for all County roadways and intersections, except, within the sphere of influence of a city that has adopted a lower Level of Service standard, the City standard shall apply.

Criteria. The following describes the criteria for determining the significance of potential impacts on Stanislaus County facilities:

Intersections. A significant project impact is defined to occur at a signalized or un-signalized intersection if the addition of project traffic causes either of the following:

1. An intersection operating at an acceptable level (LOS C or better) to degrade to an unacceptable level (LOS D or worse).
2. An increase in control delay of more than five seconds at an approach/movement at a signalized or un-signalized intersection that currently operates at an unacceptable level.

Roadway Segment. A significant project impact is defined to occur at a roadway segment if the addition of project traffic causes either of the following:

1. A roadway segment operating at an acceptable level (LOS C or better) to degrade to an unacceptable level (LOS D or worse).
2. An increase in volume-to-capacity ratio of more than 0.05 on a roadway segment that currently operates at an unacceptable level.

Public Facilities Fee (PFF) Program / Regional Traffic Impact Fee

Development in Stanislaus County and its incorporated cities pay fees toward the cost of circulation system improvements of regional benefit through the Public Facilities Fee (PFF) programs Regional Transportation Fee. The PFF was last updated in September 2017. The regional fee's project list includes the study area projects listed in Table 9.

TABLE 9
STANISLAUS COUNTY REGIONAL TRANSPORTATION FEE (RTIF) PROJECTS

Street	Location	Improvement
Faith Home Road	Bridge Over Tuolumne River	4-lane Bridge
Faith Home Road	Expressway	Corridor Study
Source: ADM Draft Stanislaus County Comprehensive Public Facilities Impact Fee Update, Wildan, September 15, 2017		

Existing Plus Project Traffic Volumes

The analysis of project impacts assumes 100% build out of the WRSP and superimposes this traffic onto current background traffic volumes that have been adjusted to reflect the new route through the project to adjoining schools. The resulting "Existing plus WRSP Build Out" traffic volumes are presented in Figure 7 if Stanford Avenue is extended and Figure 8 presents volumes assuming Stanford Avenue is not constructed to Eastgate Blvd.

For the purposes of comparison, daily traffic volumes on study area roads have been projected assuming full build out of the Specific Plan. These forecasts are presented in Table 10. As noted, this table lists project trips as well as the total segment volume including redistributed existing traffic.

Existing Plus Project Levels of Service

The peak hour Levels of Service occurring at study area intersections and Level of Service on roadway segments based on daily volume with development of the WRSP have been evaluated.

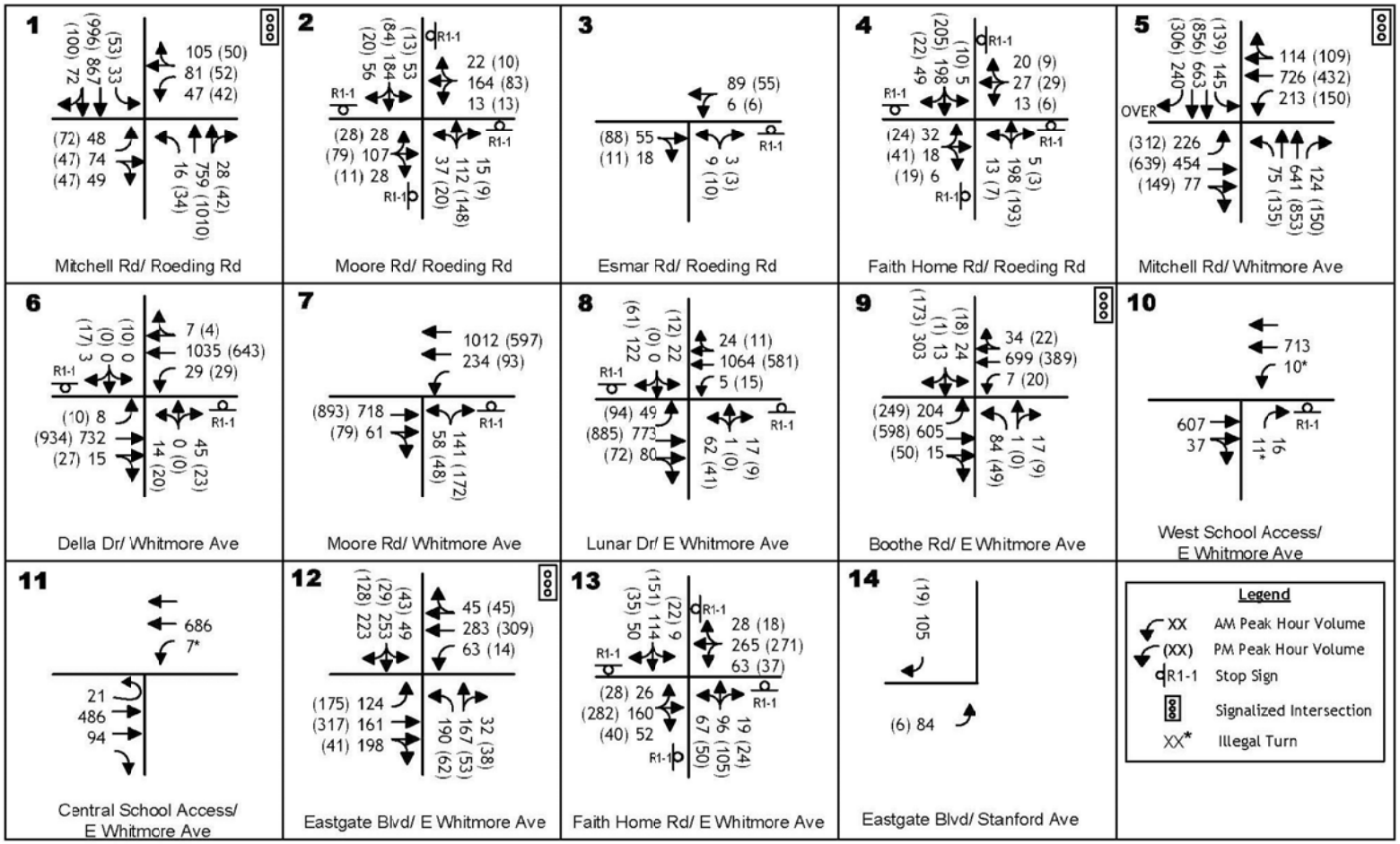
Roadway Segment Level of Service. As noted in Table 10, the addition of WRSP trips will not result in any new locations carrying daily volumes in excess of the City of Ceres minimum LOS D goal. However, without improvement the WRSP will cause the segment of Whitmore Avenue from Della Drive to Moore Road to operate at LOS E and will add traffic to the segment of Whitmore Avenue from Moore Road to Boothe Road which already operates at LOS F. Causing the segment to operate at LOS E is a significant impact, and under City policy an increase in daily traffic volumes greater than 5% is considered to be a significant impact when background conditions exceed LOS D. In this case, the project's increase represents an 11% increase.

The Safe Routes to School project will widen Whitmore Avenue primarily in the area of existing homes, and development in WRSP will be required to make frontage improvements to Whitmore Avenue as development proceeds, and ultimately the project will mitigate its impacts by widening Whitmore Avenue. However, depending on where development proceeds there may be an interim period when the road is not fully widened and the WRSP's impact remains significant. Development in the WRSP would cause the daily traffic on Whitmore Avenue to increase by 5% (i.e., 916 vehicles per day) when roughly 44% of the WRSP residences are occupied.

Impact T-1 Development of WRSP will result in Whitmore Avenue operating at Level of Service that exceed the City's LOS D minimum or increase the current volume significantly at locations where Levels of Service already exceed the LOS D minimum. This is a significant impact.

The following mitigation is applicable.

Mitigation T-1: The WRSP proponents shall cause the segment of Whitmore Avenue from Della Drive to Cesar Chavez Jr. High School to be widened to 4 lanes before 44% of the dwelling units are occupied within the WRSP or as directed by the City of Ceres. With this improvement the roadway will operate at LOS A and the project's impact will be less than significant.



EXISTING PLUS PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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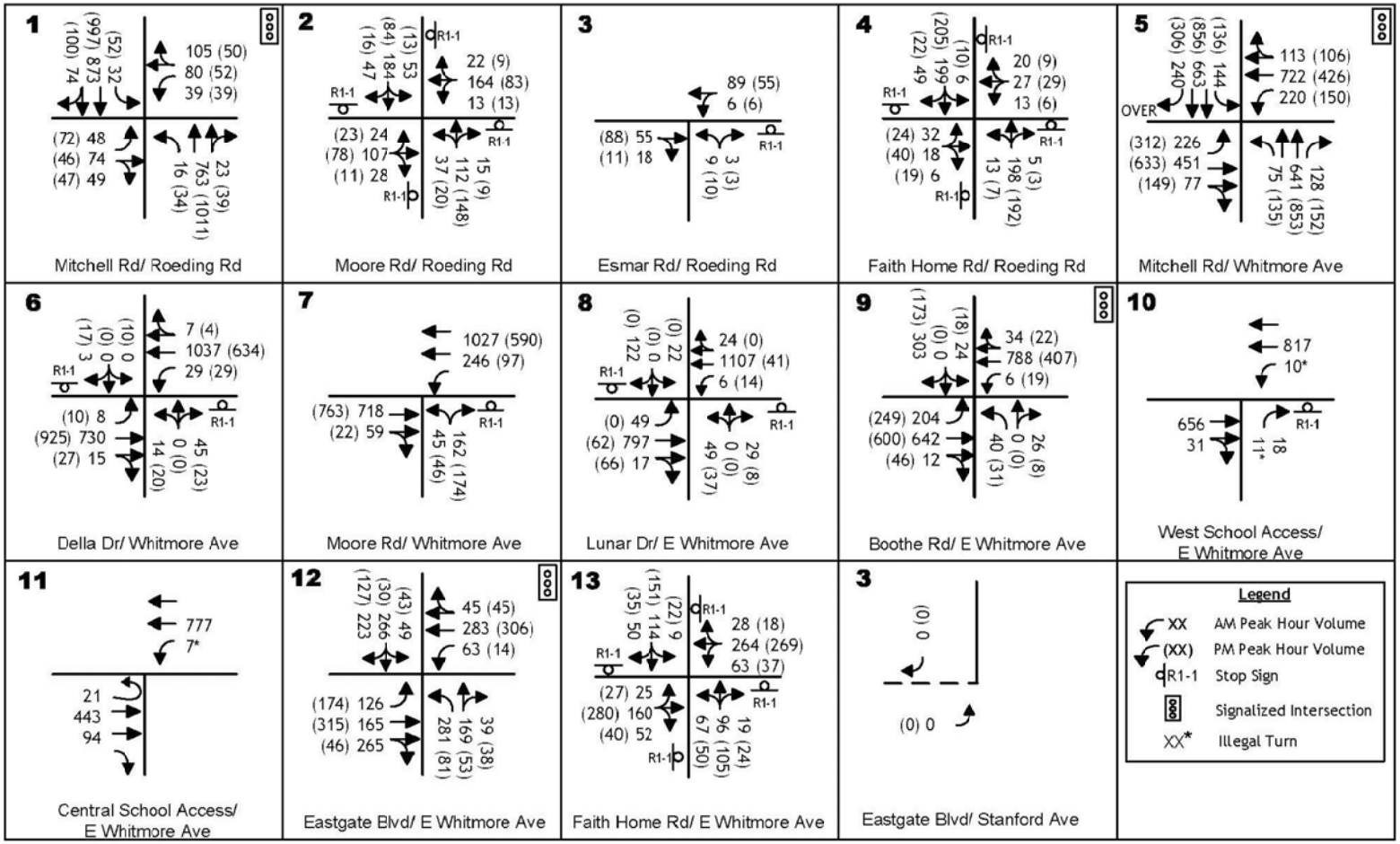
figure 7



EXISTING PLUS PROJECT WITHOUT STANFORD AVE CONNECTION
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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figure 8

TABLE 10
EXISTING PLUS PROJECT DAILY TRAFFIC VOLUMES

Roadway	Location	Classification	Lanes	Existing		Existing Plus WRSP		
				Daily Volume	LOS	Daily Volume		LOS
						Project Only	Total	
Whitmore Avenue	Mitchell Rd to Della Dr	Arterial	4	16,432	A	2,750	19,340	A
	Della Dr to Moore Rd	Arterial	2+	16,432	D	**2,750**	**19,340**	**E**
	With Four Lanes		4	16,432	A		19,340	A
	Moore Rd to Boothe Rd	Arterial	2+	**18,320**	**E**	**2,065**	**20,490**	**F**
	With Four Lanes		4	18,320	A		20,490	A
	Boothe Rd to Eastgate Blvd	Arterial	2+	13,600	B	820	14,380	B
	Eastgate Blvd to Faith Home Rd	Arterial	2	6,900	A	510	7,415	A
Faith Home Road	Whitmore Ave to Roeding Rd	Rural Road	2	4,100	C	80	4,180	C
Eastgate Blvd	South of Whitmore Ave	Secondary Collector	2	3,402	A	70	3,410	A
Moore Road	Whitmore Ave to Roeding Rd	Local	2	3,127	A	1,015	4,090	A
Roeding Road	Moore Rd to Faith Home Rd	Collector	2	1,814	A	50	1,870	A

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact
Total volume is the sum or current traffic, WRSP trips and redistributed existing traffic.

Level of Service at Intersections. Projected peak hour traffic volumes have been used to project Levels of Service with completion of the project. A.m. peak hour conditions have been assessed with and without the Stanford Avenue extension to Eastgate Blvd. With the exception of programmed improvements at Mitchell Road / Roeding Road no change to the traffic controls that exist today has been assumed. Table 11 compares "Existing" and "Existing plus WRSP" Levels of Service.

As shown, development of the Master Plan will increase the volume of traffic passing through study area intersections, and resulting traffic conditions will exceed the City's minimum standard at three locations. Conditions with and without the Stanford Avenue extension are similar, and in either case the Level of Service at the Whitmore Avenue / Eastgate Blvd intersection satisfies minimum City of Ceres requirements.

The Level of Service on the northbound approach to the **Whitmore Avenue / Moore Road intersection** will continue to exceed the City's LOS D minimum with the project, but the incremental change in delay will exceed the 30.0 seconds permitted under City guidelines. That increment could be exceeded when only 5% of the WRSP's residences are occupied, however that conclusion is dependent on the actual location of initial development, as residences on the west end of the WRSP use Moore Road to a greater extent.

In the a.m. peak hour the Level of Service on the southbound approach to the **Whitmore Avenue / Lunar Drive** intersection will drop from LOS D to LOS E, and the northbound approach will operate at LOS F. The northbound approach will operate at LOS E in the p.m. peak hour. These Levels of Service exceed the City's minimum LOS D standard. The Level of Service will become unacceptable when 50% of the residences in WRSP are developed, but again that conclusion is dependent on the location of initial development.

Development in Whitmore Ranch Specific Plan could cause the northbound approach to the **Whitmore Avenue / Boothe Road intersection** to operate at LOS F in the a.m. and p.m. peak hour. LOS F exceeds the City's minimum standard. While the Level of Service on the southbound approach will continue to be LOS F in the a.m. peak hour, the WRSP will reduce delays on this approach by adding the second eastbound through lane as a part of frontage improvements. Comparison of current and plus project conditions indicates that the LOS E threshold would be exceeded on the northbound approach when roughly 10% of the residences in WRSP are occupied.

Traffic Signal Warrants. Project traffic volumes have been compared to MUTCD peak hour warrants, and the results are noted in Table 12. As indicated the same locations that satisfy warrants under existing conditions do so with implementation of the WRSP. However, as noted previously, signalization is not necessary the preferred action at each location.

Intersection Mitigation Improvements Options. Alternatives for improving the Level of Service at study intersections have been evaluated and a preferred plan has been developed that will improve the Level of Service. Because delays at impacted locations on Whitmore Avenue are shorter without the Stanford Avenue extension than with the roadway, the analysis of improvement options focuses on the "With Stanford Avenue Extension" condition.

At the **Whitmore Avenue / Moore Road intersection** prohibiting northbound left turns will greatly reduce the length of delays on the northbound approach. Westbound traffic leaving the project would be diverted to Boothe Road and to Roeding Road. The City's LOS D minimum can be met in the a.m. and p.m. peak hour. In the long term the City may elect to further eliminate Moore Road access, which was the case with the area north of Whitmore Avenue.

Similarly, prohibiting left turns onto Whitmore Avenue would be the applicable strategy at the **Whitmore Avenue / Lunar Drive intersection.** Existing southbound left turns and the project northbound left turns would be diverted to the Boothe Road intersection. With this change the City's LOS D minimum can be met in the a.m. and p.m. peak hour.

The traffic signal included in the City's current PFF program is the applicable action at the **Whitmore Avenue / Boothe Road intersection**. Concurrently the northbound approach should need to be widened to accommodate a separate left turn lane.

The "triggers" for these improvements have been identified based on the need to avoid impacts at specific locations. However, in the case of the mitigation for intersections on Whitmore Avenue, the amount of development which triggers intersection impacts varies from 5% occupancy at Moore Road to 60% at Mitchell Road. Thus, the choice of trigger for a mitigation that affects all intersections, such as the Eastgate Blvd extension, will need to be determined by the City of Ceres. The recommended trigger is linked to impacts to the Whitmore Avenue / Boothe Road intersection, where occupancy of 10% of the WRSP residences would impact the intersection.

Impact T-2 Development of WRSP will result in study intersections operating at Level of Service that exceed the City's LOS D minimum or increase delays significantly at locations where Levels of Service already exceed the LOS D minimum and traffic signal warrants are satisfied. This is a significant impact.

Mitigations for Intersection Level of Service Impacts. The following mitigations are applicable, and the results of their implementation are noted in Figure 9 and Table 13.

Mitigation T-2A: The WRSP proponents shall cause the construction of a barrier at the Whitmore Avenue / Moore Road intersection to prohibit northbound left turns when directed by the City of Ceres.

Mitigation T-2B: The WRSP proponents shall cause the construction of a barrier at the Whitmore Avenue / Lunar Drive intersection to prohibit northbound and southbound left turns and cross traffic when directed by the City of Ceres.

Mitigation T-2C: The WRSP proponents shall cause the construction of a signalized intersection with separate left turn lanes at the Whitmore Avenue / Boothe Road intersection before 10% of WRSP's dwelling units are occupied when directed by the City of Ceres.

As noted in Table 13, peak hour Levels of Service satisfying the City of Ceres' minimum LOS D standard are projected. With these improvements the project's impact is not significant.

Pedestrian and Bicycle Facility Impacts. As noted under the discussion of existing conditions, facilities for pedestrians and bicyclists are present on most streets north of Whitmore Avenue. However, dedicated pedestrian facilities are absent along the project's Whitmore Avenue frontage. This route is already used by pedestrians, including children walking to Cesar Chavez Jr. High School and La Rosa Elementary School, and WRSP will result in an appreciable increase in traffic on Whitmore Avenue. As a result potential motor vehicles and pedestrian conflicts may occur. This is a significant impact.

The City's Safe Routes to School project in concert with developer frontage improvements will address this issue. Development in WRSP will be required to make frontage improvements to Whitmore Avenue as development proceeds, and ultimately the project will mitigate its impacts by widening Whitmore Avenue including sidewalks and bicycle lanes. However, depending on where development proceeds and the schedule for the Safe Routes to School program there may be an interim period when the safe route is not completed when the WRSP's impact remained significant. Development in the WRSP would cause the daily traffic on Whitmore Avenue to increase substantially (i.e., by 5%) when roughly 44% of the WRSP residences are occupied.

Impact T-3 Development of WRSP will result in potential conflicts between motor vehicles and pedestrians on Whitmore Avenue where dedicated facilities are lacking and the project's traffic increase is substantial. This is a significant impact.

The following mitigation is applicable.

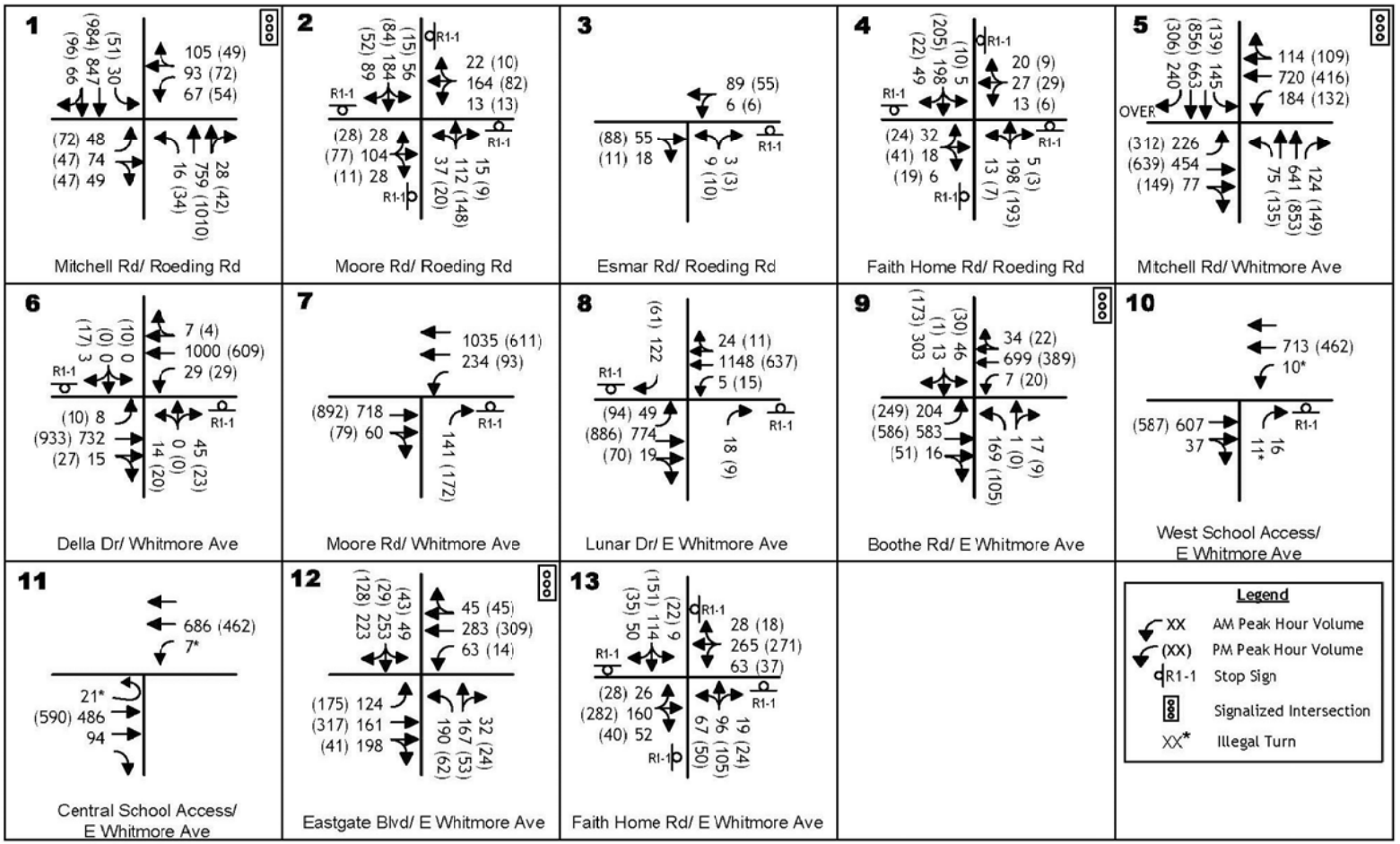
Mitigation T-3: The WRSP proponents shall cause an all-weather pedestrian facility to be constructed on the south side of the segment of Whitmore Avenue from Della Drive to Cesar Chavez Jr. High School before 44% of the dwelling units are occupied within the WRSP or as directed by the City of Ceres. With this improvement adequate pedestrian facilities will be provided, and the project's impact will be less than significant.

Transit Impacts. The residents within the WRSP may create the demand for transit services as an alternative to the private automobile. However, assuming 2% of the residences creates a candidate for transit service, the number of WRSP riders alone could reach eight. This demand can be accommodated by current services and would not justify changes to current transit routes. However, the project can contribute to the cumulative demand for transit service by constructing the bus-pull outs at the Whitmore Avenue / Boothe Road intersection that are included in the City PFF program.

Impact T-4 Development of WRSP will result incremental increase in area demand for transit service that alone is not significant but which in combination with other development may be cumulatively significant.

The following mitigation is applicable.

Mitigation T-4: The WRSP proponents shall cause a bus-pull out to be constructed at the Whitmore Avenue / Boothe Road intersection. With this improvement adequate transit facilities will be provided, and the project's impact will be less than significant.



MITIGATED EXISTING PLUS PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

TABLE 11
EXISTING PLUS PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour						PM Peak Hour			
		Existing		EX Plus WRSP				Existing		EX Plus WRSP	
				With Stanford Ave		Without Stanford Avenue					
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	13.3	B	20.6	B	20.6	B	12.5	B	16.5	B
Moore Road / Roeding Road	All-Way Stop	15.2	B	15.7	B	15.4	B	9.3	A	9.5	A
Esmar Road / Roeding Road Northbound Approach	NB Stop	9.5	A	9.6	A	9.6	A	9.4	A	9.4	A
Faith Home Road / Roeding Road	All-Way Stop	9.9	A	10.1	A	10.0	A	9.2	A	9.3	A
Mitchell Road / Whitmore Avenue	Signal	42.5	D	53.1	D	53.6	D	38.5	D	48.3	D
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	19.7 12.4	C B	17.1 13.5	C B	17.0 13.5	C B	18.8 16.1	C C	20.8 15.1	C C
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	**38.0**	**E**	**772.9**	**F**	**619.6**	**F**	33.5	D	**89.0**	**F**
Lunar Drive / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	29.0 -	D -	34.1 **74.9**	D **F**	**38.3** **57.7**	**E** **F**	14.6 -	B -	13.8 **39.3**	B **E**
Boothe Road / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	**258.8** -	**F** -	**351.6** **>999**	**F** **F**	**281.5** **>999**	**F** **F**	21.1 -	C -	20.4 **229.9**	C **F**
Eastgate Blvd / Whitmore Avenue	Signal	36.9	D	34.3	C	42.4	D	18.1	B	18.2	B
Faith Home Road / Whitmore Ave	All-Way Stop	15.0	B	16.0	C	15.9	C	17.1	C	19.6	C

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

TABLE 12
EXISTING PLUS PROJECT PEAK HOUR TRAFFIC SIGNAL WARRANTS

Intersection	Peak Hour Volumes											
	AM Peak Hour						PM Peak Hour					
	Existing			Existing Plus Project			Existing			Existing Plus Project		
	Major	Minor	Met?	Major	Minor	Met?	Major	Minor	Met?	Major	Minor	Met?
Roeding Rd / Moore Rd	352	282	No	362	293	No	288	107	No	294	118	No
Roeding Rd / Esmar Rd	164	12	No	168	12	No	155	13	No	160	13	No
Roeding Rd / Faith Home Rd	462	60	No	468	60	No	431	82	No	440	84	No
Whitmore Ave / Della Dr	1,620	59	No	1,826	59	No	1,352	43	No	1,647	43	No
Whitmore Ave / Moore Rd	1,880	151	**Yes**	2,025	199	**Yes**	1,394	185	**Yes**	1,662	220	**Yes**
Whitmore Ave / Lunar Dr	1,867	144	**Yes**	1,995	144	**Yes**	1,471	73	No	1,658	80	No
Whitmore Ave / Boothe Rd	1,575	327	**Yes**	1,564	340	**Yes**	1,233	191	**Yes**	1,328	192	**Yes**
Whitmore Ave / Faith Home Rd	557	181	No	594	182	No	634	202	No	676	208	No
Note: satisfaction of peak hour warrants indicates that a traffic signal may be justified but is not necessarily the preferred traffic control strategy at a particle location.												

TABLE 13
MITIGATED EXISTING PLUS PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour with WRSP				PM Peak Hour with WRSP			
		No Mitigation		Mitigated		No Mitigation		Mitigated	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	20.6	B	21.4	C	16.5	B	14.4	B
Moore Road / Roeding Road	All-Way Stop	15.7	B	17.8	D	9.5	A	10.5	B
Esmar Road / Roeding Road Northbound Approach	NB Stop	9.6	A	9.6	A	9.4	A	10.3	B
Faith Home Road / Roeding Road	All-Way Stop	10.1	B	10.0	A	9.3	A	9.3	A
Mitchell Road / Whitmore Avenue	Signal	53.1	D	53.1	D	48.3	D	48.3	D
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	 17.1 13.5	 C B	 16.9 13.3	 C B	 20.8 15.1	 C C	 19.7 15.3	 C C
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	**772.9**	**F**	14.3	B	**89.0**	**F**	15.6	C
Lunar Drive / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	 34.1 **74.9**	 D **F**	 20.5 12.0	 C B	 13.8 **39.3**	 B **E**	 10.8 12.0	 B B
Boothe Road / Whitmore Avenue	Signal	**>999**	**F**	39.7	D	**229.9**	**F**	27.2	C
Eastgate Blvd / Whitmore Avenue	Signal	34.3	C	34.3	C	18.2	B	18.6	B
Faith Home Road / Whitmore Avenue	All-Way Stop	16.0	C	16.0	C	19.6	C	19.4	C

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

EXISTING PLUS APPROVED PROJECTS (BASELINE) IMPACTS

This report section considers the impacts of the WRSP within the context of short term future conditions that assume occupancy of other approved development projects.

Land Use Assumptions

City of Ceres staff considered the status of development proposals to identify those projects that have been approved but have not been occupied to identify projects which might reasonably be expected to add traffic to the study area circulation system. Table 14 summarizes these projects in terms of land use and trip generation.

As shown, the approved projects could generate almost 19,000 daily trips, with 611 trips occurring in the a.m. peak hour and 1,788 trips generated in the p.m. peak hour

TABLE 14
APPROVED PROJECTS AND THEIR TRIP GENERATION

Name	Description	Trip Generation		
		Daily	AM Peak Hour	PM Peak Hour
Davente Villas	32 SFR @ River Road / Mitchell	305	24	32
Tuscany Village	40 MFR on E. Whitmore Avenue	266	20	25
Middleton	Triplex @ 2606 Lawrence Street	20	2	3
Walmart	300 ksf commercial @ Service & Mitchell	13,550	392	1,231
Nanak Plaza	14.0 ksf office/restaurant at 3404 Mitchell Rd	154	21	21
San Juan Ranch	24 SFR 2 Morgan / Hackett	228	18	24
Cherry Hollow	20 MFR @ 2800 Blaker Road	132	10	12
CLE Office Building	4.8 ksf office @ 3019 Dale Court	53	7	7
Blaker Brewing	6.0 ksf microbrewery @ 1063 Montclaire	540	5	45
Dhillon Center	102.k ksf Commercial @ 3106 Mitchell Rd	3,200	93	360
Whitmore Car lot	2.4 ksf building @ 1612 E. Whitmore Ave	78	5	6
Rai Nursing	47.0 ksf nursing facility @ 1930 Hatch	266	14	22
Total		**18,792**	**611**	**1,788**

Circulation System Improvements

Roadway improvements that may already be required of approved projects have been identified in consultation with City staff and review of other documents. No improvements were identified within the study area.

Traffic Volume Forecasts

Existing Plus Approved Projects (EPAP) No WRSP Conditions. Daily and peak hour traffic volume forecasts for the Existing Plus Approved Projects baseline conditions were created by identifying the regional trip distribution pattern for each use and superimposing these trips onto current traffic volumes. Where traffic impact studies were already available, the distribution assumptions made therein were employed and expanded as needed into the study area. Where previous traffic studies were not available, new assumptions were made based on review of other reported and local traffic patterns. Figure 10 presents the resulting Existing Plus Approved Project traffic volumes at study area intersections.

EPAP Plus WRSP Traffic Volumes. WRSP trips were superimposed onto the EPAP background condition to create "Plus Project" volumes presented in Figure 11 with Stanford Avenue extension, while Figure 12 presents volumes without the extension.

Existing Plus Approved Projects (EPAP) / No WRSP Levels of Service

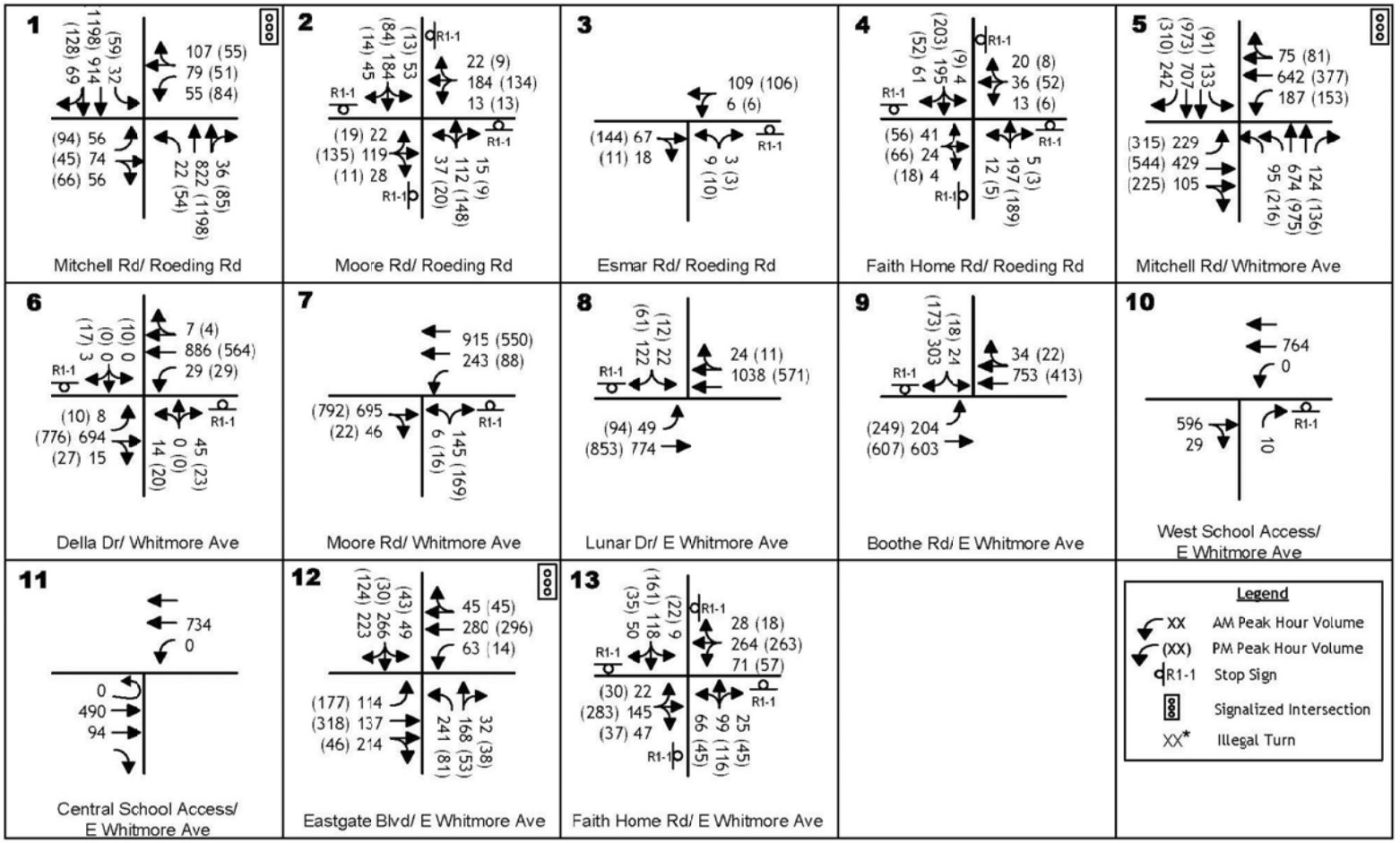
Intersection Levels of Service. Table 15 identifies background Levels of Service assuming approved projects are occupied and the improvements required of those projects are made. As indicated two locations will operate with Levels of Service that exceed the City's minimum LOS D standard. As indicated, operating Levels of Service are similar with and without the Stanford Avenue connection.

The Level of Service at the Mitchell Road / Whitmore Avenue intersection will drop to LOS E in the p.m. peak hour.

The Level of Service on the northbound approach to the **Whitmore Avenue / Moore Road intersection** will continue to exceed the City's LOS D minimum.

Development of approved projects will contribute to LOS F conditions on the southbound approach to the **Whitmore Avenue / Boothe Road intersection.**

Roadway Segment Level of Service. As shown in Table 16, occupancy of approved projects will incrementally increase the volume of traffic on study area roads, and the Level of Service on Whitmore Avenue from Della Drive to Cesar Chavez Jr. High School will continue to exceed the LOS D standard.



EXISTING PLUS APPROVED PROJECTS
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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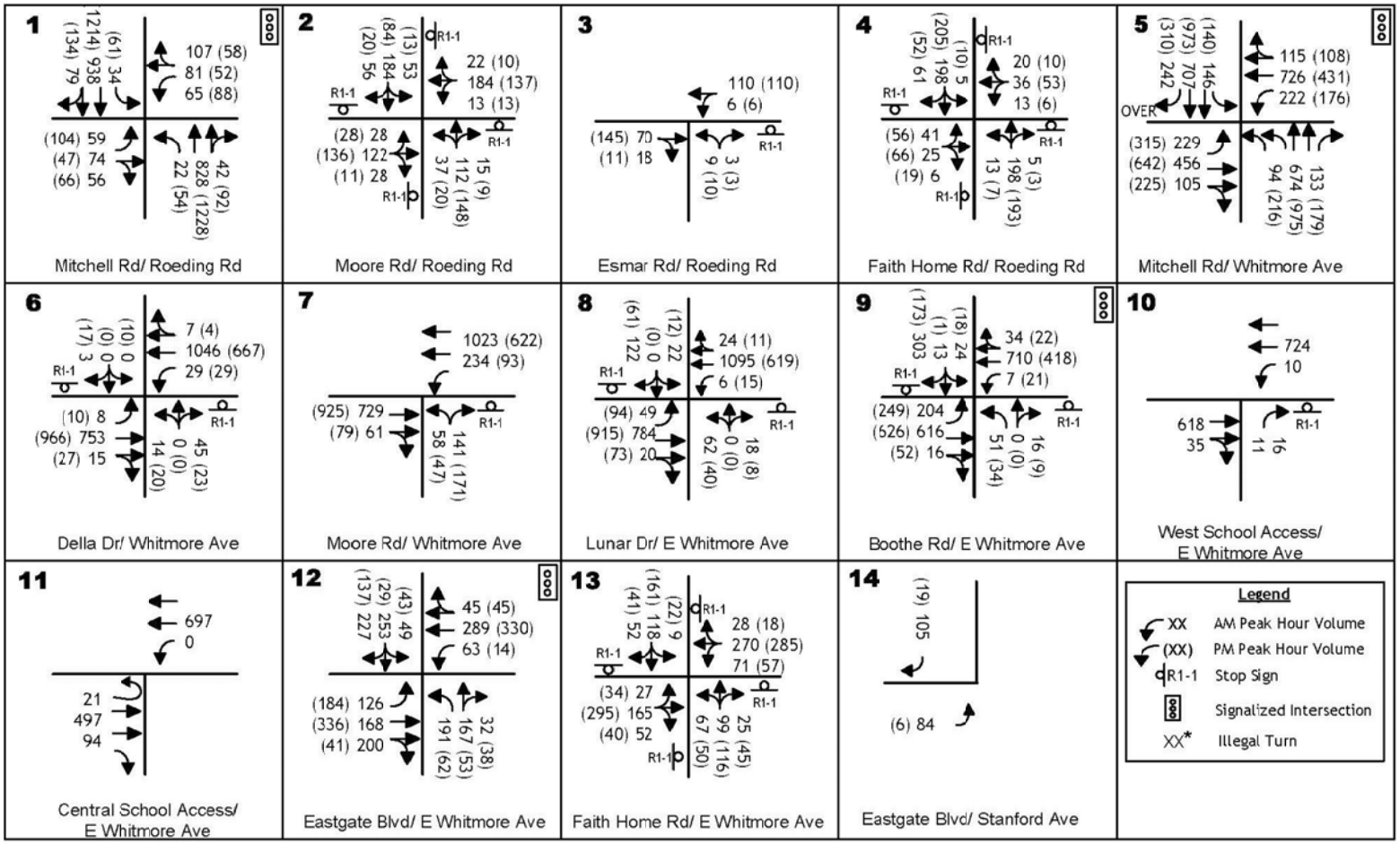
figure 10



EPAP PLUS PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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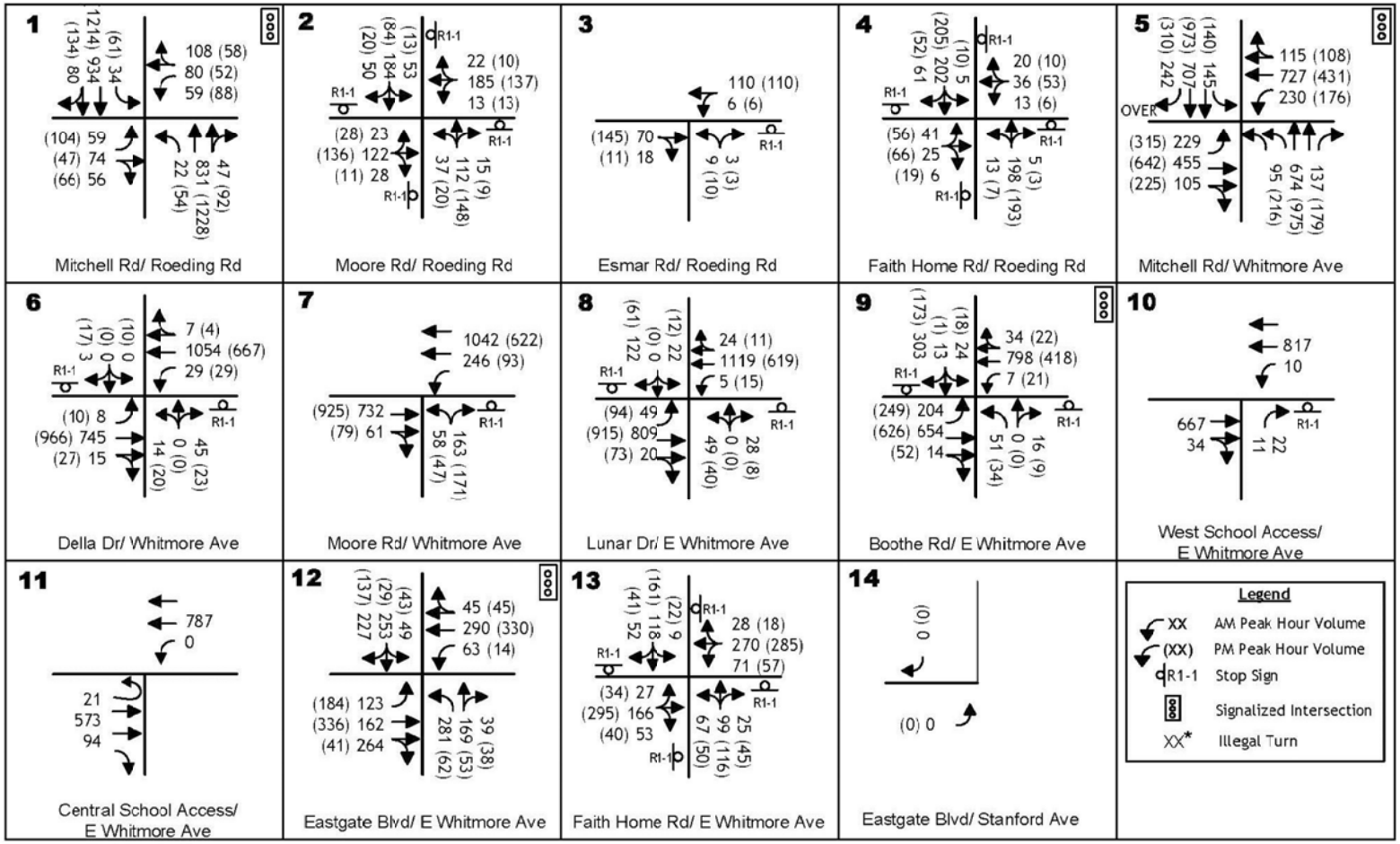
figure 11



EPAP PLUS PROJECT WITHOUT STANFORD AVE EXTENSION
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

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figure 12

EPAP Plus WRSP – Levels of Service

Intersection Levels of Service. As indicated in Table 15, the addition of WRSP trips to the baseline EPAP conditions will contribute to one intersection changing to LOS E and three intersections continuing to operate at Level of Service in excess of the City's LOS D standard.

The **Mitchell Road / Whitmore Avenue intersection** will operate at LOS E. LOS E exceeds the City's LOS D minimum standard. The incremental change in delay caused by the project is 8.8 seconds, which exceeds the City's allowable standard of 5.0 seconds. The intersection improvements included in the City fee program will be needed (i.e., 6-lane Mitchell Road).

The Level of Service on the northbound approach to the **Whitmore Avenue / Moore Road intersection** will continue to exceed the City's LOS D minimum with the project, and the incremental change in delay will exceed the 30.0 seconds permitted under City guidelines.

In the a.m. peak hour the Level of Service on the southbound approach to the **Whitmore Avenue / Lunar Drive** intersection will drop from LOS D to LOS E, and the northbound approach will operate at LOS F in the a.m. and LOS E in the p.m. peak hour. These Levels of Service exceed the City's minimum LOS D standard.

Development in Whitmore Ranch Specific Plan could cause the northbound approach to the **Whitmore Avenue / Boothe Road intersection** to operate at LOS F in the a.m. and p.m. peak hour. LOS F exceeds the City's minimum standard.

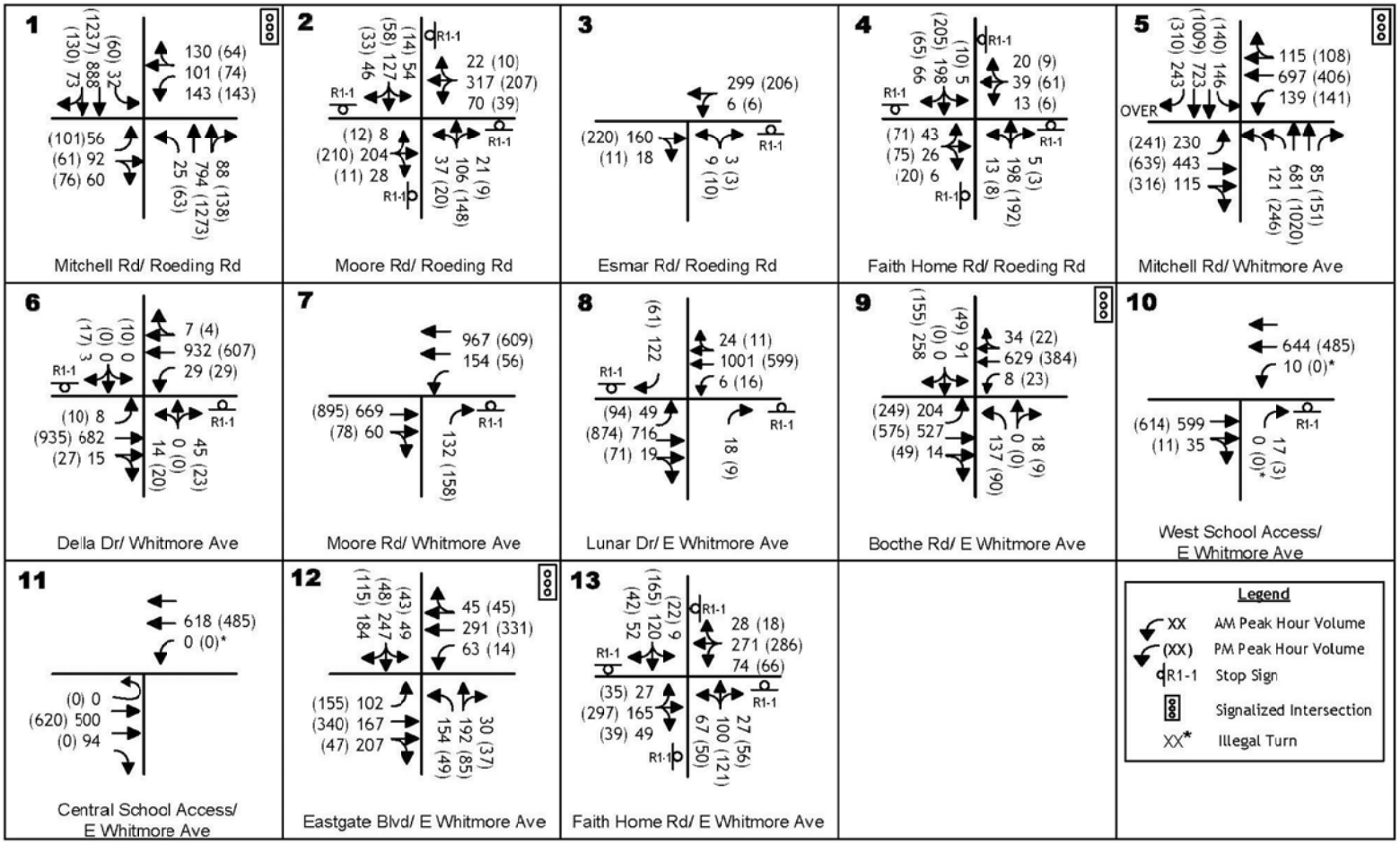
Impact T-5 Development of WRSP will result study in intersections operating at Level of Service that exceed the City's LOS D minimum or will increase delays significantly at locations where Levels of Service already exceed the LOS D minimum under Existing and traffic signal warrants are satisfied. This is a significant impact.

While these impacts are significant, the same on-site mitigations identified for Existing Plus Project impacts remain valid, and two additional mitigations are applicable. Figure 13 presents Mitigated EPAP Plus WRSP traffic volumes and Table 17 identifies mitigated Levels of Service.

The project's impact to the Mitchell Road / Whitmore Avenue intersection is significant. The City fee program includes funds for improving Mitchell Road to a 6-lane facility. This improvement will result in LOS D or better conditions.

Mitigation T-5A: The WRSP proponents shall contribute their fair share the cost of constructing an additional through lane in each direction on Mitchell Road by paying adopted traffic impact mitigation fees. With this improvement adequate Level of Service will be provided, and the project's impact will be less than significant.

Roadway Segment Level of Service. As shown in Table 16, occupancy of WRSP will incrementally increase the volume of traffic on study area roads, and the Level of Service on Whitmore Avenue from Della Drive to Cesar Chavez Jr. High School will continue to exceed the LOS D standard. However, the issue is addressed by Mitigation T-1, and no further mitigation is required.



MITIGATED EPAP PLUS PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

KD Anderson & Associates, Inc.
Transportation Engineers

0090-08 RA 8/29/2018

figure 13

TABLE 15
EXISTING PLUS APPROVED PROJECTS INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour						PM Peak Hour			
		Existing Plus Approved Projects		EPAP Plus WRSP				Existing Plus Approved Projects		EPAP Plus WRSP	
				With Stanford Avenue		Without Stanford Avenue					
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	20.3	C	20.0	C	19.8	C	25.2	C	24.4	C
Moore Road / Roeding Road	All-Way Stop	16.3	C	17.2	C	16.7	C	10.4	B	10.8	B
Esmar Road / Roeding Road Northbound Approach	NB Stop	9.9	A	9.8	A	9.8	A	10.2	B	10.2	B
Faith Home Road / Roeding Rd	All-Way Stop	10.2	B	10.3	B	10.4	B	10.4	B	10.1	B
Mitchell Road / Whitmore Ave	Signal	43.9	D	52.3	D	52.8	D	**57.8**	**E**	**66.5**	**E**
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	20.0 12.4	C B	17.4 13.6	C B	17.3 13.7	C B	19.5 16.6	C C	21.5 15.5	C C
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	**39.5**	**E**	**785.6**	**F**	**952.3**	**F**	**37.0**	**E**	**102.8**	**F**
Lunar Drive / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	31.3 -	D -	**35.0** **72.6**	**E** **F**	**39.2** **59.9**	**E** **F**	15.0 -	C -	14.1 **42.4**	B **E**
Boothe Road / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	**271.2** **-**	**F** **-**	**377.7** **>999**	**F** **F**	**532.4** **>999**	**F** **F**	23.0 -	C -	22.8 **267.3**	C **F**
Eastgate Blvd / Whitmore Avenue	Signal	37.1	D	35.1	D	41.5	D	18.5	B	18.8	C
Faith Home Road / Whitmore Ave	All-Way Stop	16.1	C	17.2	C	17.3	C	23.0	C	28.5	D

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

TABLE 16
EXISTING PLUS APPROVED PROJECTS DAILY TRAFFIC VOLUMES

Roadway	Location	Classification	Lanes	Existing			Existing Plus WRSP		
				Daily Volume		Level of Service	Daily Volume		LOS
				Approved Projects	Total		Project Only	Total[1]	
Whitmore Avenue	Mitchell Rd to Della Dr	Arterial	4	585	17,020	A	2,750	19,925	A
	Della Dr to Moore Rd	Arterial	2+	585	17,020	D	**2,750**	**19,925**	**E**
	Moore Rd to Boothe Rd	Arterial	2+ / 4	**585**	**18,905**	**E**	2,065	21,075	A
	Boothe Rd to Eastgate Blvd	Arterial	2+	585	14,195	B	820	14,785	B
	Eastgate Blvd to Faith Home Rd	Arterial	2	405	7,305	A	510	7,820	A
Faith Home Road	Whitmore Ave to Roeding Rd	Rural Road	2	665	4,765	C	80	4,845	C
Eastgate Blvd	South of Whitmore Ave	Secondary Collector	2	40	3,445	A	70	3,410	A
Moore Road	Whitmore Ave to Roeding Rd	local	2	0	3,130	A	1,015	4,090	A
Roeding Road	Moore Rd to Faith Home Rd	Collector	2	1,195	3,010	A	50	3,065	A

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact.
(1) Total includes redistribution of existing traffic due to route through project to schools

TABLE 17
MITIGATED EPAP PLUS PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour with WRSP				PM Peak Hour with WRSP			
		No Mitigation		Mitigated		No Mitigation		Mitigated	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	20.0	C	20.2	C	24.4	C	25.4	C
Moore Road / Roeding Road	All-Way Stop	17.2	C	19.6	C	10.8	B	10.9	B
Esmar Road / Roeding Road Northbound Approach	NB Stop	9.9	A	9.8	A	10.2	B	10.2	B
Faith Home Road / Roeding Road	All-Way Stop	10.3	A	10.3	A	10.1	B	10.1	B
Mitchell Road / Whitmore Avenue	Signal	52.3	D	51.3	D	**66.5**	**E**	54.8	D
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	17.4 13.6	C B	17.1 13.3	C B	21.5 15.5	C C	22.5 15.1	C C
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	**785.6**	**F**	14.5	B	**102.8**	**F**	17.1	C
Lunar Drive / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	**35.0** **72.6**	**E** **F**	20.7 12.1	C B	14.1 **42.4**	B **E**	11.4 12.5	B B
Boothe Road / Whitmore Avenue	Signal	**>999**	**F**	52.6	D	**267.3**	**F**	23.2	C
Eastgate Blvd / Whitmore Avenue	Signal	35.1	D	34.9	C	18.8	C	18.8	B
Faith Home Road / Whitmore Avenue	All-Way Stop	17.2	C	17.2	C	28.5	D	28.7	D

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

CUMULATIVE TRAFFIC IMPACTS

This report section considers the impacts of the WRSP within the context of long term traffic conditions that may accompany the development of regional circulation system improvements, regional development and implementation of the pending City of Ceres General Plan Update. To evaluate the impacts of the WRSP on future traffic conditions in the project area Year 2040 traffic volumes with and without the project were identified and assessed.

Approach to Using Ceres GPU Traffic Model

Available sources of information regarding future traffic conditions were consulted for this report, and the version of the Stanislaus Council of Governments (StanCOG) Tri-County regional travel demand forecasting model that was adapted for the Ceres General Plan Update was determined to be the best starting point. Because the land uses in the proposed project are consistent with the pending General Plan, the forecasts derived from the new traffic model represent the "plus Project" conditions.

Methodology. An "incremental approach" was taken to use the traffic model to create intersection turning movements and roadway segment volumes to best account for inherent limitations of a regional traffic model. The 2040 run results were compared to the GPA model's Year 2015 calibrated baseline year forecasts, and the incremental difference in segment volume was identified on a daily and peak hour basis. These increments were added to observed Year 2016 volumes to create the "adjusted" future condition. Individual growth rates were then calculated for each segment and intersection approach by comparing observed and adjusted future volumes. Finally, these growth rates were applied to the turning movement volumes at each intersection, and the results were balanced using the techniques contained in *Transportation Research Board's (TRB's) NCHRP report 255, Highway Data for Urbanized Area Project Planning and Design*.

The Cumulative No Project condition assumes that circulation system improvements are made but that no development occurs on the project site. No project traffic volume forecasts were created by identifying the WRSP's trip assignment under long term conditions and manually subtracting these trips from the Year 2040 plus Project values.

The analysis of cumulative traffic conditions conservatively assumes that existing peak hour factors (PHF's) at study area intersections will continue in the future. While it may be argued that PHF's may change in the future as background traffic increases, the presence of local schools will continue to influence peaking characteristics, particularly in the a.m. peak hour. For this reason this analysis assumes a "worst case" view by retaining existing PHF's.

Assumed Improvements

Because the long term cumulative analysis assumes community wide growth, including development of neighboring properties, the evaluation of future traffic conditions also assumes

implementation of planned regional and local circulation system improvements. For the cumulative analysis the following programmed improvements have been assumed:

1. Completion of the SR 99 / Mitchell Road interchange Modification Project.
2. Widening of Whitmore Avenue to 4-lanes per the City of Ceres PFF
3. Construction of the Faith Home Road Bridge across the Tuolumne River per the RTIF.
4. Widening of Faith Home Road south of the Tuolumne River to a four-lane expressway per the City of Ceres PFF
5. Installation of new traffic signals at the Whitmore Avenue / Boothe Road and Whitmore Avenue / Faith Home Road intersection per the City of Ceres PFF.

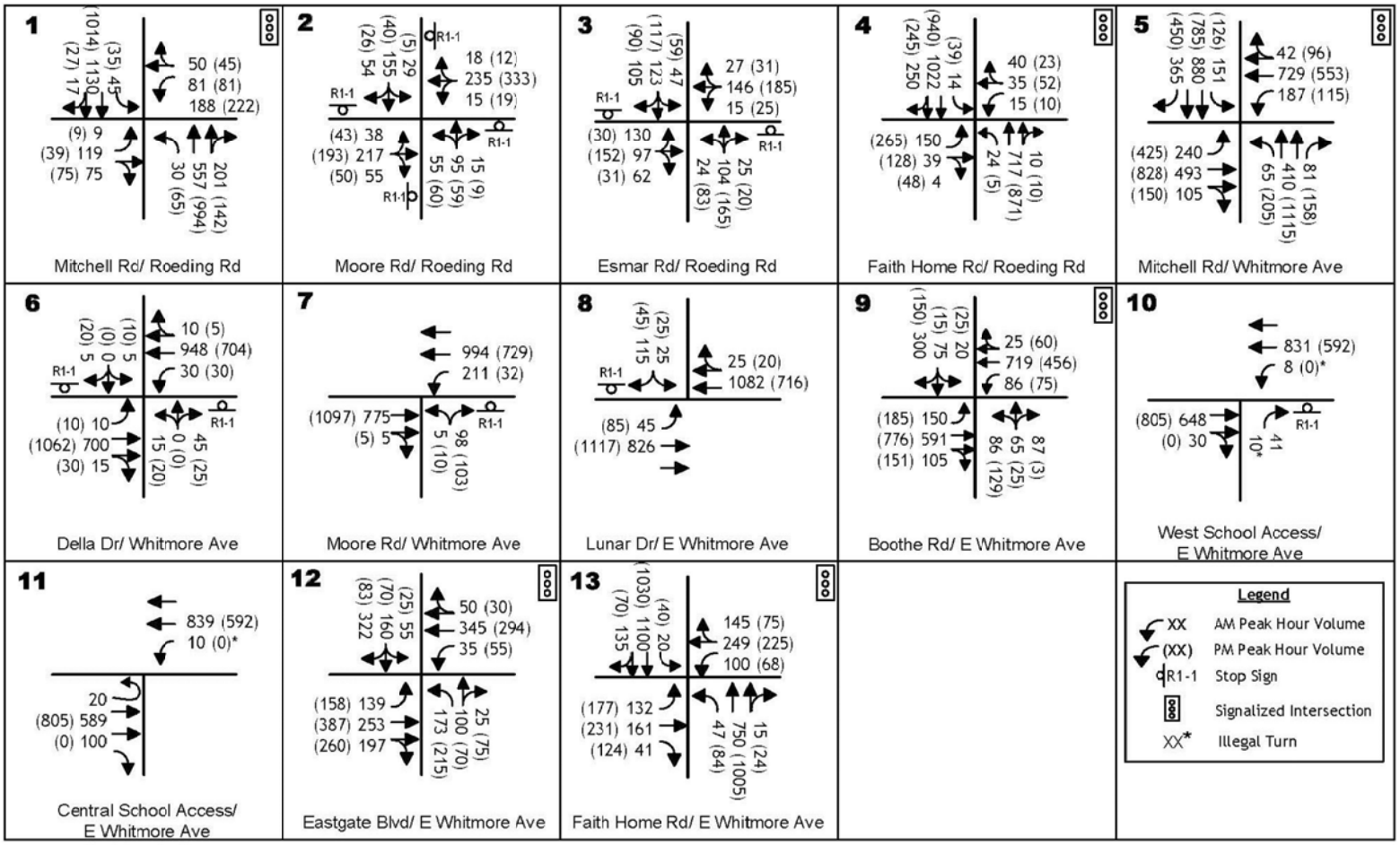
The City of Ceres considered the possibility of other local area development and indicated that the following local area improvements should be assumed although specific funding mechanisms are not in place:

- Completion of Stanford Avenue from Moore Road to Eastgate Blvd along the south side of the WRSP.
- Extension of Lunar Drive south from the WRSP to Roeding Road.
- Extension of Esmar Road to the north to connect to Boothe Road at the southern limits of the WRSP and to the south to Service Road.
- Extension of Eastgate Blvd from the current terminus across Roeding Road to Service Road.

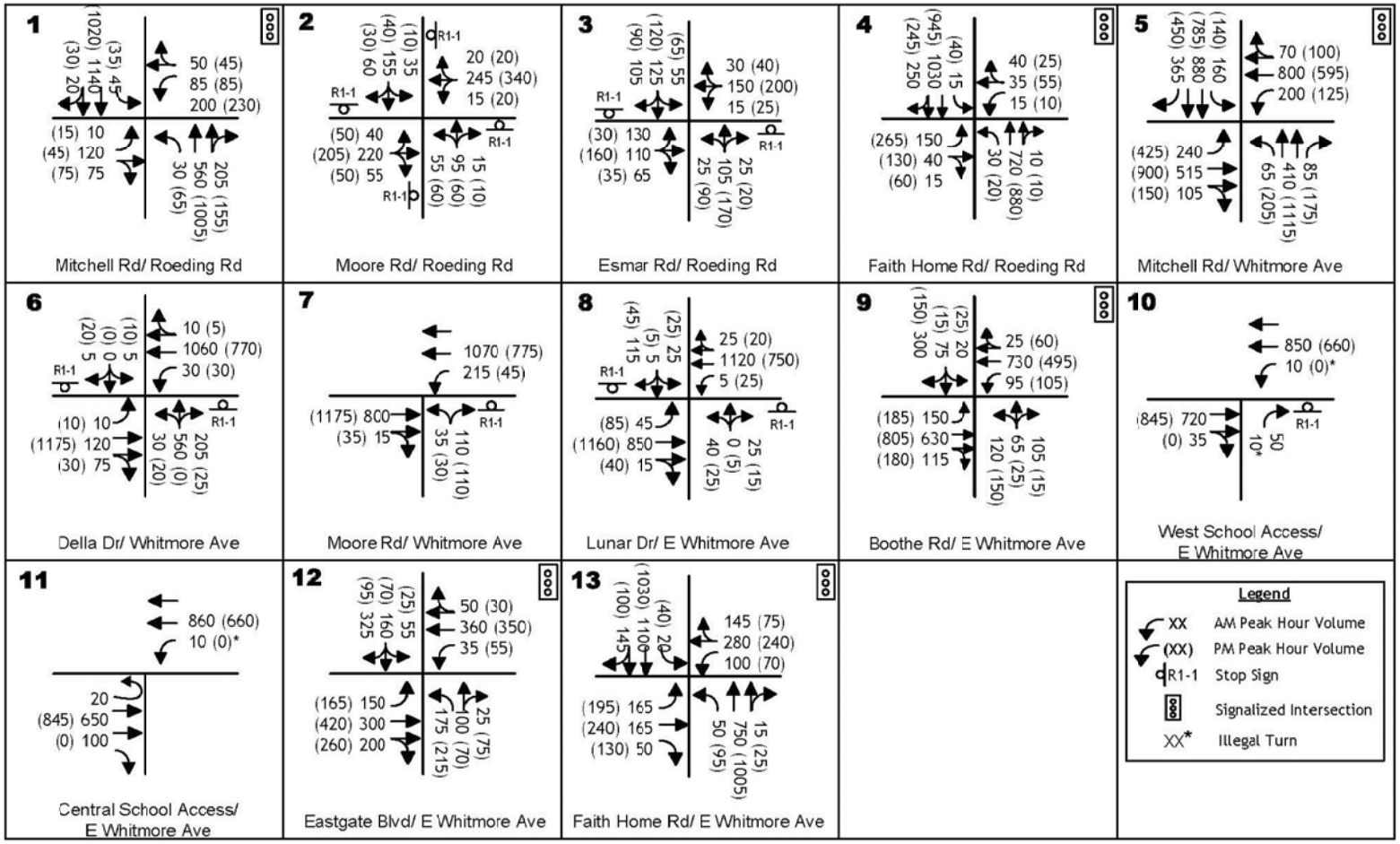
Traffic Volume Forecasts

Daily Traffic Volumes. Cumulative Year 2040 daily traffic volume projections are presented for with and without project conditions in Table 18.

Peak Hour Traffic Volumes. Peak hour volumes were developed for conditions with and without the WRSP. Figure 14 presents a.m. and p.m. peak hour volumes assuming cumulative development without the occupancy of the WRSP. Figure 15 presents "Cumulative plus WRSP" volumes.



CUMULATIVE WITHOUT PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS



CUMULATIVE WITH PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

KD Anderson & Associates, Inc.
Transportation Engineers
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figure 15

TABLE 18
CUMULATIVE YEAR 2040 PLUS PROJECT DAILY TRAFFIC VOLUMES

Roadway	Location	Classification	Lanes	Year 2040 No Project		Year 2040 with WRSP		
						Daily Volume		
				Daily Volume	Level of Service	Project Only	Total	LOS
Whitmore Avenue	Mitchell Rd to Della Dr	Arterial	4	21,565	A	1,760	23,325	A
	Della Dr to Moore Rd	Arterial	4	21,565	A	1,760	23,325	A
	Moore Rd to Boothe Rd	Arterial	4	21,015	A	1,375	22,390	A
	Boothe Rd to Eastgate Blvd	Arterial	4	19,875	A	975	20,850	A
	Eastgate to Faith Home Rd	Arterial	4	9,370	A	730	10,100	A
Faith Home Road	Whitmore Ave to Roeding Rd	Expressway	4	27,425	C	150	27,625	C
Eastgate Blvd	South of Whitmore Ave	Secondary Collector	2	4,310	A	190	4,500	A
Esmer Road-Boothe	Whitmore Ave to Roeding Rd	Primary Collector	2	3,430	A	870	4,300	A
Moore Road	Whitmore Ave to Roeding Rd	Local	2	1,350	A	750	2,100	A
Roeding Road	Moore Rd to Faith Home Rd	Secondary Collector	2	8,085	A	340	8,425	A

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

Cumulative (Year 2040) No Project Levels of Service

The results Level of Service analysis for both peak hours are shown in Table 19 and are further described in the following text.

Intersection Levels of Service without WRSP. As noted in Table 19, if no development occurs on the WRSP, then three intersections will still operate with Level of Service that do not satisfy the City's Minimum LOS D standard.

The Northbound and Southbound approaches to the **Roeding Road / Esmar Road / Boothe Road intersection** will operate at LOS E-F during the a.m. and p.m. peak hour. The intersection is projected to operate at LOS D in the a.m. peak hour with all-way stop control. A traffic signal could also deliver the City's minimum Level of Service standard, but the volume of traffic at the intersection does not reach the level that satisfies peak hour warrants. Alternatively, traffic controls that eliminate some turning movements or close off one leg might be considered as was the case at the Whitmore Avenue / Moore Road intersection.

The **Mitchell Road / Whitmore Avenue intersection** is projected to operate at LOS E in the p.m. peak hour, which exceeds the LOS D minimum. As has been noted earlier, the City's fee program includes funds to widen Mitchell Road to a 6-lane facility. However, that improvement would only yield LOS E. Because the corners of the intersection are occupied, acquiring the right of way for additional widening of the intersection will be problematic.

The **Whitmore Avenue / Boothe Road intersection** is projected to operate at LOS E in the a.m. peak hour. Improving the Level of Service could be improved by creating a northbound left turn lane on Boothe Road. Additional improvement could be achieved by reconfiguring the striping on the southbound approach to create a southbound right turn lane on Boothe Road. This action would require a parking prohibition on the west side of Boothe Road.

Roadway Segment Levels of Service. As noted in Table 18, if future circulation system improvements are made by development in the WRSP does not occur, then all study are roadways will carry daily traffic volumes that satisfy the City of Ceres' minimum LOS D standard.

Cumulative (Year 2040) with WRSP Levels of Service

Peak Hour Intersection Levels of Service. As noted in Table 19, the addition of WRSP trips to cumulative background conditions results in six intersections which will operate with Levels of Service in excess of the City's minimum LOS D standard.

The **Roeding Road / Esmar Road / Boothe Road intersection** will operate at LOS F with and without the project. Because conditions exceed the City's minimum standard, the significance of the project's impacts is based on the change in delay. In this case the project would add less than 30.0 seconds of delay to any approach, and the project's impact is not significant, and mitigation is not required.

The **Mitchell Road / Whitmore Avenue intersection** is projected to operate at LOS E in the p.m. peak hour with the project. Because conditions exceed the City's minimum standard, the significance of the project's impacts is based on the change in delay. In this case the project would add more than 5.0 seconds of overall delay, and the project's impact is significant.

The northbound approach to the **Whitmore Avenue / Moore Road intersection** will deteriorate to LOS F conditions with the addition of project trips. Because LOS F exceeds the City's minimum standard this is a significant impact.

The northbound approach to the **Whitmore Avenue / Lunar Drive intersection** will deteriorate to LOS F conditions with the addition of project trips. Because LOS F exceeds the City's minimum standard this is a significant impact.

The **Whitmore Avenue / Boothe Road intersection** is projected to deteriorate from LOS E to LOS F in the a.m. peak hour with the addition of WRSP trips. Because conditions exceed the City's minimum LOS D standard, the significance of the project's impact is based on the change in delay. In this case the project would add more than 5.0 seconds of overall delay, and the project's impact is significant.

The **Whitmore Avenue / Faith Home Road intersection** is projected to operate at LOS E in the a.m. peak hour with the addition of project trips. Because LOS E exceeds the City's minimum standard, this is a significant impact.

Roadway Segment Level of Service with WRSP. As noted in Table 18, the addition of WRSP trips does not result in any roadway segment operating with Level of Service in excess of the City's LOS D standard.

Conditions with Cumulative (Year 2040) Improvements

Mitigation Measures. The approach to mitigation of cumulative impacts is similar to that already identified for Existing plus Project conditions. A combination of traffic control changes at un-signalized intersections and local improvements is needed. These include:

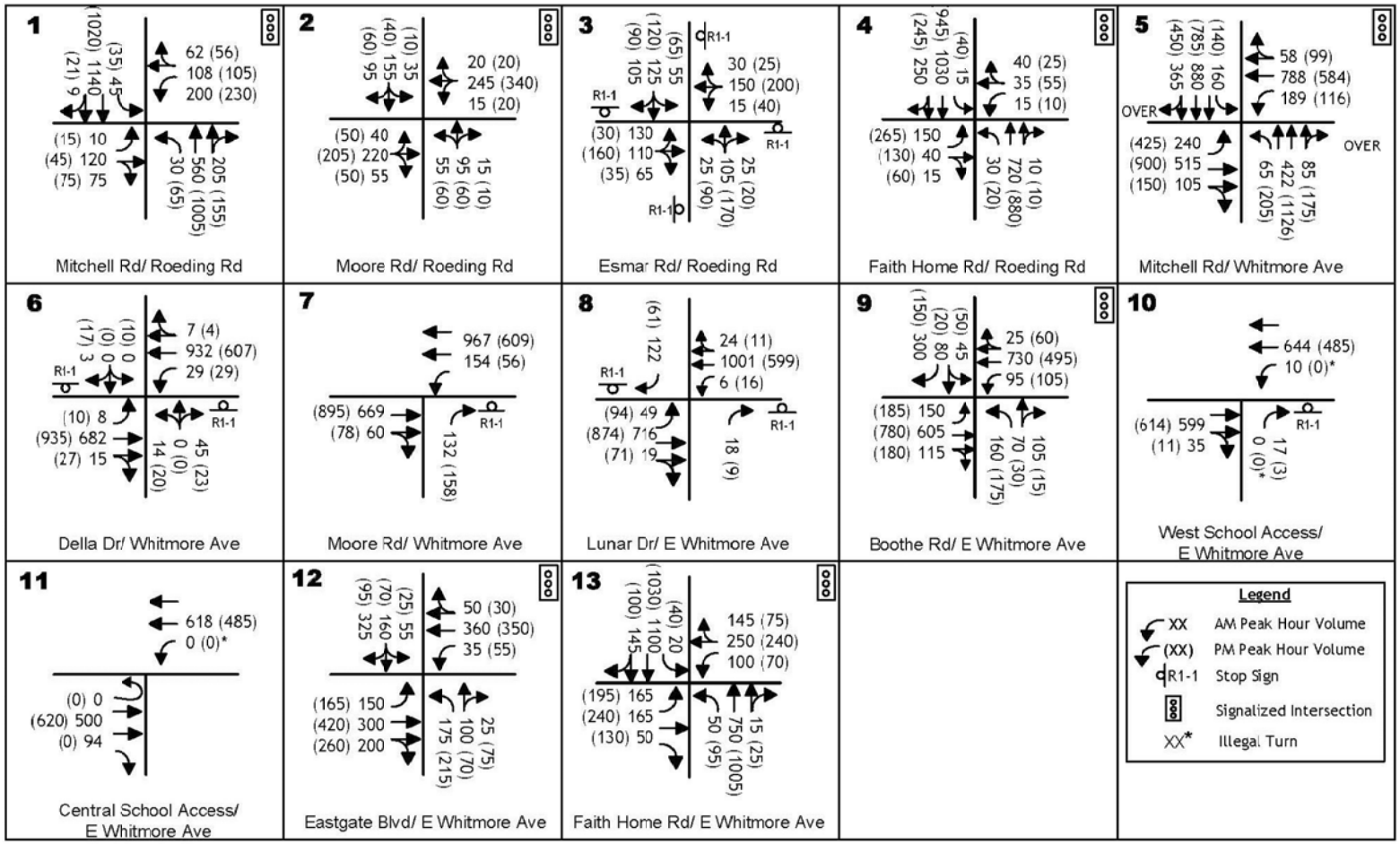
- Mitchell Road / Whitmore Avenue intersection: Install fee program's 6-lanes on Mitchell Road
- Whitmore Avenue / Moore Road intersection: prohibit northbound left turns
- Whitmore Avenue / Lunar Drive intersection: prohibit northbound and southbound left turns
- Whitmore Avenue / Boothe Road intersection: add a northbound left turn lane and southbound right turn lane

Mitigated Cumulative Intersection Levels of Service. Figure 16 and Table 20 identifies the results of implementing cumulative mitigation measures in terms of intersection Level of Service.

Mitigation Measure T5A requires the project to contribute to the cost of improving the Mitchell

Road / Whitmore Avenue intersection by paying adopted impact fees. However, while delays are reduced with that planned improvement the Mitchell Road / Whitmore Avenue intersection is projected to operate at LOS E in the p.m. peak hour. No additional improvements appear feasible as the adjoining intersection corners are fully occupied. ***As a result, the impact is Significant and Unavoidable.***

The redistribution of trips caused by implementing mitigations at the Whitmore Avenue / Moore Road and Whitmore Avenue / Lunar Drive intersection will increase the volume of traffic through the Roeding Road / Moore Road intersection and poorer Levels of Service will result. The relative difference in delay with an all-way stop exceeds the threshold of significance. A traffic signal would theoretically address this issue and deliver adequate Level of Service, but, as was the case at the Whitmore Avenue / Moore Road intersection, the City could also elect to abandon Moore Road. This issue will need to be addressed when the balance of the area north of Roeding Road develops in the future, and project mitigation is not required.



MITIGATED CUMULATIVE PLUS PROJECT
TRAFFIC VOLUMES AND LANE CONFIGURATIONS

KD Anderson & Associates, Inc.
Transportation Engineers

0090-08 RA 8/29/2018

figure 16

TABLE 19
CUMULATIVE PLUS PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Control	AM Peak Hour				PM Peak Hour			
		Year 2040 No Project		Year 2040 Plus WRSP		Year 2040 No Project		Year 2040 Plus WRSP	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	30.7	C	30.4	C	24.5	C	25.7	C
Moore Road / Roeding Road	All-Way Stop	26.5	D	31.9	D	15.6	C	17.3	C
Esmar Road / Roeding Road Northbound Approach Southbound Approach	NB/SB Stop	**37.4** **54.4**	**E** **F**	**43.4** **75.3**	**E** **F**	**58.3** **32.8**	F E	**86.5** **44.3**	**F** **E**
Faith Home Road / Roeding Road	Signal	24.2	C	25.0	C	24.2	C	25.7	C
Mitchell Road / Whitmore Avenue	Signal	47.6	D	51.9	D	**72.5**	E	**78.2**	**F**
Della Drive / Whitmore Avenue Northbound Approach Southbound Approach	NB/SB Stop	16.0 22.6	C C	17.6 26.1	C D	24.0 15.9	C C	28.0 17.1	D C
Moore Road / Whitmore Avenue Northbound Approach	NB Stop	22.9	C	**384.4**	**F**	23.0	C	**75.2**	**F**
Lunar Drive / Whitmore Avenue Southbound Approach Northbound Approach	SB Stop	29.5 -	D -	29.2 **66.8**	D **F**	17.4 -	C -	26.7 **50.6**	D **F**
Boothe Road / Whitmore Avenue	Signal	**66.9**	**E**	**88.4**	**F**	32.1	C	30.1	C
Eastgate Blvd / Whitmore Avenue	Signal	43.9	D	46.0	D	26.1	C	27.2	C
Faith Home Road / Whitmore Avenue	Signal	50.3	D	**58.2**	**E**	43.1	D	48.4	D

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

TABLE 20
MITIGATED CUMULATIVE PLUS PROJECT INTERSECTION LEVELS OF SERVICE

Intersection	Control	Year 2040 AM Peak Hour				Year 2040 PM Peak Hour			
		No Mitigation		Plus Mitigation		No Mitigation		Plus Mitigation	
		Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS
Mitchell Road / Roeding Road	Signal	30.4	C	31.5	C	25.7	C	25.5	C
Moore Road / Roeding Road	All-Way Stop	31.9	D	**41.2**	**E**	17.3	C	18.4	C
	Signal			7.4	A				
Esmar Road / Roeding Road	NB /SB Stop								
Northbound Approach		**43.4**	**E**	**43.4**	**E**	**86.5**	**F**	**86.5**	**F**
Southbound Approach		**75.3**	**F**	**75.3**	**F**	**44.3**	**E**	**44.3**	**E**
Faith Home Road / Roeding Road	Signal	24.2	C	25.0	C	25.7	C	25.7	C
Mitchell Road / Whitmore Avenue	Signal	51.9	D	54.2	D	**78.2**	**F**	**71.6**	**E**
Della Drive / Whitmore Avenue	NB/SB Stop								
Northbound Approach		17.6	C	12.8	C	28.0	D	27.7	D
Southbound Approach		26.1	D	16.0	D	17.1	C	16.7	C
Moore Road / Whitmore Avenue	NB Stop								
Northbound Approach		**384.4**	**F**	13.6	B	75.2	F	**17.5**	**C**
Lunar Drive / Whitmore Avenue	SB Stop								
Southbound Approach		29.2	D	17.6	B	26.7	D	14.1	B
Northbound Approach		**66.8**	**F**	11.6	C	50.6	F	11.9	B
Boothe Road / Whitmore Avenue	Signal	**88.4**	**F**	34.0	C	30.1	C	32.1	C
Eastgate Blvd / Whitmore Avenue	Signal	46.0	D	46.0	D	27.2	C	27.2	C
Faith Home Road / Whitmore Avenue	Signal	**58.2**	**E**	45.7	D	48.4	D	42.2	D

Bold values exceed the minimum LOS standard. **Highlighted** values are a significant impact

APPENDIX

(under separate cover)

APPENDIX B

Mitigation Monitoring and Reporting Program

City of Ceres

Whitmore Ranch Specific Plan

Mitigation Monitoring and Reporting Program

Prepared for:

Prepared by:

AECOM

with assistance from KD Anderson & Associates, Inc.

October 2018

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MITIGATION MONITORING AND REPORTING PROGRAM

CALIFORNIA ENVIRONMENTAL QUALITY ACT REQUIREMENT

Where a California Environmental Quality Act (CEQA) document has identified significant environmental effects, Public Resources Code Section 21081.6 requires adoption of a "reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment."

This Environmental Mitigation Monitoring and Reporting Program (MMRP) has been prepared to provide for the monitoring of mitigation measures required of the Whitmore Ranch Specific Plan (proposed project), as set forth in the Final Environmental Impact Report (EIR).

The City of Ceres is the Lead Agency that must adopt the MMRP for development and operation of the project. This report will be kept on file with the City of Ceres, 2220 Magnolia Street, Ceres, California 95307.

The CEQA Statutes and Guidelines provide direction for clarifying and managing the complex relationships between a lead agency and other agencies with implementing and monitoring mitigation measures. In accordance with CEQA Guidelines Section 15097(d), "each agency has the discretion to choose its own approach to monitoring or reporting; and each agency has its own special expertise." This discretion will be exercised by implementing agencies at the time they undertake any of portion of the project, as identified in the EIR.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

The intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures. The MMRP is intended to be used by City staff and others responsible for project implementation.

This document identifies the individual mitigation measures, the party responsible for monitoring implementation of the measure, the timing of implementation, and space to confirm implementation of the mitigation measures.

ROLES AND RESPONSIBILITIES

The City of Ceres will oversee monitoring and documenting the implementation of mitigation measures. The City or its construction contractor is responsible for fully understanding and effectively implementing all of the mitigation measures contained within this MMRP. Certain mitigation measures also will require that the applicant coordinate or consult with one or more other public agencies in implementing mitigation measures specified herein.

CHANGES TO MITIGATION MEASURES

Any substantive change in the MMRP is required to be reported in writing. Modifications to the mitigation measures may be made by the City of Ceres, subject to one of the following findings, and documented by evidence included in the public record:

- The mitigation measure included in the Final EIR and the MMRP is no longer required because the significant environmental impact identified in the Final EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the project, changes in environment conditions, or other factors.

OR,

- The modified or substitute mitigation measure provides a level of environmental protection equal to, or greater than that afforded by the mitigation measure included in the Final EIR and the MMRP; and,

- The modified or substitute mitigation measure or measures do not have significant adverse effects on the environment in addition to, or greater than those which were considered by the responsible hearing parties in their decisions on the Final EIR and the proposed project; and,

- The modified or substitute mitigation measures are feasible, and the City, through measures included in the MMRP or other City procedures, can ensure implementation.

SUPPORT DOCUMENTATION

Findings and related documentation supporting the findings involving modifications to mitigation measures shall be maintained in the project file with this MMRP and shall be made available to the public upon request.

This MMRP will be kept on file at:

City of Ceres Community Development Department
2220 Magnolia Street
Ceres, CA 95307

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
3.2. Agriculture					
3.2-1	**Mitigate Loss of Important Farmland.** Prior to the approval of improvement plans, building permits, or recordation of the final map, project applicants for projects in the Specific Plan Area shall offset the loss of Prime Farmland. This shall be done in coordination with the City, through the acquisition of conservation easements in Stanislaus County at a 1:1 ratio (i.e., 1 acre on which easements are acquired to 1 acre of Prime Farmland removed from agricultural use) that provide in-kind or similar resource value protection; payment of in-lieu fees to an established, qualified, mitigation program to fully fund the acquisition and maintenance of agricultural land or easements; or compliance with the City's Plan for Agricultural Preservation, as adopted by Stanislaus LAFCO in accordance with LAFCO Policy 22.	Prior to the approval of improvement plans, building permits, or recordation of the final map	Project applicant(s)		
3.2-2	**Provide the County's Right-to-Farm Notice to Prospective Residents Adjacent to Active Agricultural Uses.** Project applicant(s) for residential uses within the Specific Plan Area shall provide Stanislaus County's Right-to-Farm Notice (Section 9.32.050, in Chapter 9.32 of the Stanislaus County Municipal Code) to all prospective homebuyers within 150 feet of the southern Specific Plan Area boundary. The Right-to-Farm Notice shall be included in all residential deeds at the time of sale. The Right-to-Farm Notice shall contain, and be substantially in the form of the following (Section 9.32.050[F]): "The County of Stanislaus recognizes and supports the right to farm agricultural lands in a manner consistent with accepted customs and standards. Residents of property on or near agricultural land should be prepared to accept the inconveniences or discomforts associated with agricultural operations, including but not limited to noise, odors, flies, fumes, dust, the operation of machinery of any kind during any 24-hour period (including aircraft), the storage and disposal of manure, and the application by spraying or otherwise of chemical fertilizers, soil amendments, herbicides and pesticides. Stanislaus County has determined that inconveniences or discomforts associated with such agricultural operations shall not be considered to be a nuisance if such operations are consistent with accepted customs and standards. Stanislaus County has established a grievance committee to assist in the resolution of any disputes which might arise between residents of this County regarding agricultural	Prior to occupancy permit	Project applicant(s)		

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	operations. If you have any questions concerning this policy or the grievance committee, please contact the Stanislaus County Department of Planning and Community Development."				
3.3. Air Quality					
3.3-3	**Use Current Phase Equipment for All Construction Equipment.** Site developers/leaseholders/project applicants who wish to develop facilities in the Specific Plan Area shall construct all facilities using current phase construction equipment (currently Tier 4) to reduce exposure of sensitive receptors to any toxic air contaminants.	During construction	Project applicant(s) and/or contractor(s)		
3.4. Biological Resources					
3.4-1a	**Avoid Direct Loss of Swainson's Hawk and Other Raptors.** Tree removal shall be completed during the nonbreeding season for raptors (between September 1 and the end of February). To avoid, minimize, and mitigate potential impacts on Swainson's hawk and other raptors (not including burrowing owl) nesting on or adjacent to the project site, the project applicant shall retain a qualified biologist to conduct preconstruction surveys and identify active nests on and within 0.5 mile of the project site for construction activities conducted during the breeding season (between March 1 and August 31). The surveys shall be conducted before the approval of grading and/or improvement plans (as applicable) and no less than 14 days and no more than 30 days before the beginning of construction. Guidelines provided in Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in the Central Valley (Swainson's Hawk Technical Advisory Committee 2000) shall be followed for surveys for Swainson's hawk. Impacts on nesting Swainson's hawks and other raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. No project activity shall commence within the buffer areas until a qualified biologist has determined in coordination with CDFW the young have fledged, the nest is no longer active, or reducing the buffer would not result in nest abandonment. CDFW guidelines recommend implementation of 0.25- or 0.5-mile-wide buffers, but the size of the buffer may be adjusted if a qualified biologist and the City, in consultation with CDFW, determine that such an adjustment would not be likely to adversely affect the nest.	Prior to and during construction	Project applicant(s)		

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	The appropriate no-disturbance buffer for other raptor nests (i.e., species other than Swainson's hawk) shall be determined by a qualified biologist based on site-specific conditions, the species of nesting bird, nature of the project activity, visibility of the disturbance from the nest site, and other relevant circumstances. Monitoring of all active raptor nests by a qualified biologist during construction activities will be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist.				
3.4-1b	**Avoid Direct Loss of Burrowing Owl.** To avoid, minimize, and mitigate potential impacts on burrowing owl, the project applicant shall retain a qualified biologist to conduct focused breeding and nonbreeding season surveys for burrowing owls in areas of suitable habitat on and within 1,500 feet of the project site. Surveys will be conducted prior to the start of construction activities and in accordance with Appendix D of CDFW's Staff Report on Burrowing Owl Mitigation (2012). If no occupied burrows are found, a letter report documenting the survey methods and results will be submitted to CDFW and no further mitigation will be required. If an active burrow is found during the nonbreeding season (between September 1 and January 31), the project applicant will consult with CDFW regarding protection buffers to be established around the occupied burrow and maintained throughout construction. If occupied burrows are present that cannot be avoided or adequately protected with a no-disturbance buffer, a burrowing owl exclusion and relocation plan will be developed in consultation with CDFW and in accordance with CDFW's Staff Report on Burrowing Owl Mitigation (2012). Owls will be relocated outside of the impact area using passive or active methodologies developed in consultation with CDFW and may include active relocation to preserve areas if approved by CDFW and the preserve managers. No burrowing owls will be excluded from occupied burrows until the burrowing owl exclusion and relocation plan is approved by CDFW.	Prior to and during construction	Project applicant(s)		

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	If an active burrow is found during the breeding season (between February 1 and August 31), occupied burrows will not be disturbed and will be provided with a 150- to 1,500-foot protective buffer unless a qualified biologist verifies through noninvasive means that either: (1) the birds have not begun egg laying, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The appropriate size of the buffer (between 150 and 1,500 feet) will depend on the time of year and level of disturbance, as outlined in the CDFW Staff Report (2012:9). Once the fledglings are capable of independent survival, the owls will be relocated outside the impact area following a burrowing owl exclusion and relocation plan developed in consultation with CDFW and the burrow will be destroyed to prevent owls from reoccupying it. No burrowing owls will be excluded from occupied burrows until the burrowing owl exclusion and relocation plan is approved by CDFW. Following owl exclusion and burrow demolition, the site shall be monitored by a qualified biologist to ensure burrowing owls do not recolonize the site prior to construction. If active burrowing owl nests are found on the project site and these nest sites are lost as a result of implementing the project, then the project applicant shall mitigate the loss through preservation of other known nest sites at a ratio of 1:1. Preservation shall be provided through purchase of credits from a CDFW-approved burrowing owl conservation bank if credits are available in an appropriate location. If mitigation credits are not available, the applicant shall develop a mitigation and monitoring plan for the compensatory mitigation areas in consultation with CDFW. The mitigation and monitoring plan will include detailed information on the habitats present within the preservation areas, the long-term management and monitoring of these habitats, legal protection for the preservation areas (e.g., conservation easement, declaration of restrictions), and funding mechanism information (e.g., endowment). All burrowing owl mitigation lands shall be preserved in perpetuity and incompatible land uses shall be prohibited in habitat conservation areas. Burrowing owl mitigation lands shall be located as close as possible, based on availability of sufficient suitable habitat, to the project site. The project applicants shall transfer said burrowing owl mitigation land, through either conservation easement or fee title, to a third-party, nonprofit conservation organization (Conservation Operator), with the City and CDFW named as third-party beneficiaries. The Conservation Operator shall				

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	be a qualified conservation easement land manager that manages land as its primary function. Additionally, the Conservation Operator shall be a tax-exempt nonprofit conservation organization that meets the criteria of Civil Code Section 815.3(a) and shall be selected or approved by the City, after consultation with CDFW. The City, after consultation with CDFW and the Conservation Operator, shall approve the content and form of the conservation easement. The City, CDFW, and the Conservation Operator shall each have the power to enforce the terms of the conservation easement. The Conservation Operator shall monitor the easement in perpetuity to ensure compliance with the terms of the easement.				
3.4-1c	**Prepare and Implement a Swainson's Hawk Foraging Habitat Mitigation Plan.** Before any ground-disturbing activities, suitable Swainson's hawk foraging habitat shall be preserved to ensure replacement of foraging habitat lost as a result of the project, as determined by a qualified biologist, in consultation with CDFW. The habitat value shall be based on Swainson's hawk nesting distribution and an assessment of habitat quality, availability, and use within the County. The mitigation ratio shall be consistent with the 1994 DFG Swainson's Hawk Guidelines included in the Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California. These guidelines specify that the mitigation ratio shall be 1:1 if there is an active nest within 1 mile of the project site, 0.75:1 if there is an active nest within 5 miles but greater than 1 mile away, and 0.5:1 if there is an active nest within 10 miles but greater than 5 miles away. If there is an active nest within 1 mile of the project site, the mitigation ratio can be reduced to 0.5:1 if all of the mitigation land can be actively managed for prey production. Such mitigation shall be accomplished through either the transfer of fee title or perpetual conservation easement. The mitigation land shall be located within the known foraging area of the regional Swainson's hawk population based on the habitat assessment described above. Before acceptance of such proposed mitigation, the City shall consult with CDFW regarding the appropriateness of the mitigation. If mitigation is accomplished through a conservation easement, then such an easement shall ensure the continued management of the land to maintain Swainson's hawk foraging values, including but not limited to, ongoing agricultural uses and the maintenance of all existing water rights associated with the land. The	Prior to issuance of grading permit	City of Ceres		

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	conservation easement shall be recordable and shall prohibit any activity that substantially impairs or diminishes the land's capacity as suitable Swainson's hawk foraging habitat. Purchase of credits from a CDFW-approved Swainson's hawk mitigation bank may be used as an alternative to conservation easements to compensate for foraging habitat lost as a result of the project. The mitigation bank must be located within the range of the regional Swainson's hawk population. Before purchase of mitigation credits from the mitigation bank, the City shall consult with CDFW to confirm that the proposed mitigation bank provides appropriate foraging habitat relative to the proximity to the project site and quality of habitat. Swainson's hawk mitigation land shall be transferred, through either conservation easement or fee title, to a third-party, nonprofit conservation organization (Conservation Operator), with the CDFW named as third-party beneficiaries. The Conservation Operator shall be a qualified conservation easement land manager that manages land as its primary function. Additionally, the Conservation Operator shall be a tax-exempt nonprofit conservation organization that meets the criteria of Civil Code Section 815.3(a). CDFW and the Conservation Operator shall approve the content and form of the conservation easement. CDFW and the Conservation Operator shall each have the power to enforce the terms of the conservation easement. The Conservation Operator shall monitor the easement in perpetuity to assure compliance with the terms of the easement.				
3.4-2	**Avoid Direct Loss of Loggerhead Shrike and Protected Bird Nests.** To the extent feasible, City shall encourage vegetation removal, grading, and other ground disturbing activities to be carried out during the nonbreeding season (between September 1 and January 31) for protected bird species in this region to avoid and minimize impacts to loggerhead shrike and other nesting birds. For any project activity that would occur during the nesting season (between February 1 and August 31), the project applicant shall conduct a preconstruction survey. The preconstruction survey shall be conducted by a qualified biologist before any activity occurring within 500 feet of suitable nesting habitat for any protected bird species. The survey shall be timed to maximize the potential to detect nesting birds, and should be repeated within 10 days of the start of project-related activity.	Prior to and during construction	Project applicant(s)		

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	If an active loggerhead shrike or common bird species protected by the Migratory Bird Treaty Act or California Fish and Game Code is found, the qualified biologist shall establish a buffer around the nest. No project activity shall commence within the buffer area until a qualified biologist confirms that the nest is no longer active. The size of the buffer shall be determined in consultation with CDFW. Buffer size is anticipated to range from 50 to 500 feet, depending on the nature of the project activity, the extent of existing disturbance in the area, and other relevant circumstances as determined by a qualified biologist in consultation with CDFW. If common bird nests are found, a qualified biologist shall ensure compliance with the Migratory Bird Treaty Act and Fish and Game Code Section 3503. Monitoring of all protected nests by a qualified biologist during construction activities will be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined by a qualified biologist.				
3.4-3	**Avoid, Minimize, and Mitigate Loss of Western Red Bat Roosts.** If any trees are proposed for removal during the breeding season (May through August), a qualified biologist shall be retained to conduct a focused survey for red bats in roosting trees proposed for removal. An evening emergence survey shall note the presence or absence of bats and could consist of visual survey at the time of emergence. If evidence of red bat use is observed, the location of the trees used by the bats shall be determined. Bat detectors may be used to supplement survey efforts, but are not required. If no bat roosts are found, then no further study is required. If red bats are determined to be present in trees in the project area, the tree shall be protected until breeding is completed and the young are capable of independent flight. If a tree supporting a red bat must be removed, a detailed mitigation program addressing compensation, exclusion methods, and roost removal procedures shall be developed, in consultation with CDFW, before implementation.	Prior to issuance of grading permit	Project applicant(s)		
3.4-4	**Implement Mitigation Measures 3.4-1, 3.4-2, and 3.4-3.**	As noted under each mitigation measure	As noted under each mitigation measure		

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3.4-5	**Avoid, Minimize, and Mitigate Loss of Bat Roosts.** Before removal of any trees or existing buildings, a qualified biologist shall conduct a focused survey for roosting bats in suitable trees and structures. Surveys should be conducted as far in advance of project implementation as feasible to allow sufficient time to coordinate with CDFW and develop a mitigation plan if necessary, as described below. The survey shall be conducted in the fall to determine if structures are used as hibernacula and in spring and/or summer to determine if they are used as maternity or day roosts. An evening emergence survey shall note the presence or absence of bats and could consist of visual survey at the time of emergence. If evidence of bat use is observed, the number and species of bats using the roost shall be determined. Bat detectors may be used to supplement survey efforts, but are not required. If no bat roosts are found, then no further study is required. If bat roosts are determined to be present, the bats shall be excluded from the roosting site before the roost structure is removed. If roosts must be removed, a detailed mitigation program addressing compensation, exclusion methods, and roost removal procedures shall be developed, in consultation with CDFW, before implementation. Exclusion methods may include use of one-way doors at roost entrances (bats may leave but not reenter), or sealing roost entrances when the site can be confirmed to contain no bats. Exclusion efforts will be restricted during periods of sensitive activity (e.g., during hibernation or while females in maternity colonies are nursing young). Compensatory mitigation for the loss of each roost (if any) shall be developed, in consultation with CDFW, and may include construction and installation of bat boxes suitable to the bat species and colony size excluded from the original roosting site. Roost replacement will be implemented before bats are excluded from the original roost site. Once compensation is implemented and it is confirmed that bats are not present in the roost site, the roost structure may be removed.	Prior to issuance of demolition or grading permit, as appropriate and prior to removal of any roost site, if necessary	Project applicant(s)		
3.5. Cultural Resources					
3.5-1	**Implement Procedures to Avoid or Reduce Impacts on Cultural Resources.** In the event that any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during construction-related earth-moving activities, all ground-disturbing activity within 100 feet of the	During construction	Project applicant and construction contractor(s)		

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	resources shall be halted and the City of Ceres shall be notified. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), representatives of the City and the qualified archaeologist shall determine the appropriate course of action, with the City making the final decision. All significant cultural materials recovered shall be subject to scientific analysis, professional museum curation, and a report shall be prepared by the qualified archaeologist according to current professional standards. If the archaeologist determines that some or all of the affected property qualifies as a Native American Cultural Place, including a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (Public Resources Code Section 5097.9) or a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to California Public Resources Code Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (California Public Resources Code Section 5097.993), the archaeologist shall recommend to the City potentially feasible mitigation measures that would preserve the integrity of the site or minimize impacts on it, including any or a combination of the following: ▸ avoidance, preservation, and/or enhancement of all or a portion of the Native American Cultural Place as open space or habitat, with a conservation easement dedicated to the most interested and appropriate tribal organization. If such an organization is willing to accept and maintain such an easement, or alternatively, a cultural resource organization that holds conservation easements; ▸ an agreement with any such tribal or cultural resource organization to maintain the confidentiality of the location of the site so as to minimize the danger of vandalism to the site or other damage to its integrity; or ▸ Other measures, short of full or partial avoidance or preservation, intended to minimize impacts on the Native American Cultural Place consistent with the proposed design and footprint of the development project for which the requested grading permit has been approved. ▸ After receiving such recommendations, the City shall assess the feasibility of the recommendations and impose the most protective mitigation				

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	feasible in light of land use assumptions and the proposed design and footprint of the development project. The City shall, in reaching conclusions with respect to these recommendations, consult with both the project applicant(s) and the most appropriate and interested tribal organization. In addition, projects proposed under the Specific Plan shall comply with Ceres 2035 General Plan Policies 4.I.1, which states that the City shall not knowingly approve any public or private project that may adversely affect an archaeological site without first consulting the California Archaeological Inventory, conducting a site evaluation as may be indicated, and attempting to mitigate any adverse impacts according to the recommendations of a qualified archaeologist. City implementation of this policy shall be guided by Appendix G of the CEQA Guidelines. Mitigation shall include avoidance of cultural resources where possible and feasible.				
3.5-2a	**Implement Mitigation Measure 3.5-1.**	During construction	Project applicant and construction contractor(s)		
3.5-2b	**Halt Construction if Human Remains are Discovered and Implement Appropriate Actions.** If human remains are discovered at any construction sites during any phase of construction, all ground-disturbing activity within 100 feet of the remains shall be halted immediately, and the City of Ceres and the County coroner shall be notified immediately. If the remains are determined by the County Coroner to be Native American, Native American Heritage Commission shall be notified within 24 hours, and the guidelines of the Native American Heritage Commission shall be adhered to in the treatment and disposition of the remains. The project applicant(s) shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the Native American Heritage Commission. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of CEQA Guidelines Section 15064.5(e) and Public Resources Code section 5097.98. The project applicant(s) shall implement approved mitigation, to be verified by the City, before the resumption of ground-disturbing activities	During construction	Project applicant and construction contractor(s)		

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	within 100 feet of where the remains were discovered.				
3.6. Geology, Soils, Minerals, and Paleontological Resources					
3.6-1	**Prepare a Geotechnical Report per California Building Code (CBC) Requirements and Implement Appropriate Recommendations and Monitor Earthwork During Ground-Disturbing Activities.** Before building permits are issued and construction activities begin, a California Registered Civil Engineer shall be retained to prepare a final geotechnical subsurface investigation report, which shall be submitted to the City's Engineering Division for review and approval. The final geotechnical engineering report shall address and make recommendations on the following, as applicable: ▸ Site preparation; ▸ Soil bearing capacity; ▸ Appropriate sources and types of fill; ▸ Potential need for soil amendments; ▸ Road, pavement, and parking areas; ▸ Structural foundations, including retaining-wall design; ▸ Grading practices; ▸ Soil corrosion of concrete and steel; ▸ Erosion/winterization; ▸ Seismic ground shaking; and ▸ Unstable soils. In addition to the recommendations for the conditions listed above, the geotechnical investigation shall determine appropriate foundation designs that are consistent with the version of the CBC that is applicable at the time of application for building and grading permits. Special recommendations contained in the geotechnical engineering report shall be noted on the grading and improvement plans and implemented, as appropriate, before construction begins. Design and construction of all new project development shall be in accordance with the CBC. All earthwork shall be monitored by a qualified civil or geotechnical engineer to ensure compliance with project plans and specifications. The geotechnical or civil engineer shall provide oversight during all excavation,	Prior to issuance of building permit	Project applicant(s) and/or contractor(s)		

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	placement of fill, and disposal of materials removed from and deposited on the construction areas.				
3.6-3a	**Prepare and Implement a Grading and Erosion Control Plan.** Before grading permits are issued or earthmoving activities are conducted, a California Registered Civil Engineer shall be retained to prepare a grading and erosion control plan. The plan shall be submitted to the City Engineering Division for review and approval. The plan shall be consistent with the State's NPDES permit and shall include the site-specific grading. The plan referenced above shall include the location, implementation schedule, and maintenance schedule of all erosion and sediment control measures, a description of measures designed to control dust and stabilize the construction-site road and entrance, and a description of the location and methods of storage and disposal of construction materials. Erosion and sediment control measures could include the use of detention basins, berms, swales, wattles, and silt fencing, and covering or watering of stockpiled soils to reduce wind erosion. Stabilization of construction entrances to minimize trackout (control dust) is commonly achieved by installing filter fabric and crushed rock to a depth of approximately 1 foot. The project applicant shall ensure that the construction contractor is responsible for securing a source of transportation and deposition of excavated materials.	Prior to issuance of grading permit and during construction	Project applicant(s) and/or contractor(s)		
3.6-3b	**Implement Mitigation Measure 3.9-1c (Prepare and Implement a Stormwater Pollution Prevention Plan and Associated Best Management Practices).**	Prior to and during construction	Project applicant(s) and/or contractor(s)		
3.6-4	**Implement Mitigation Measure 3.6-1 (Prepare a Geotechnical Report per California Building Code (CBC) Requirements and Implement Appropriate Recommendations and Monitor Earthwork During Ground-Disturbing Activities).**	Prior to issuance of building permit	Project applicant(s) and/or contractor(s)		

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3.6-5	**Conduct Construction Worker Personnel Education and Stop Work if Paleontological Resources are Encountered.** ▸ Before the start of any earthmoving activities for the project, the project applicant shall retain the services of a qualified archaeologist or paleontologist to inform the construction crew, including the site superintendent, about the possibility of encountering subsurface fossils and notification procedures should fossils be encountered. ▸ If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work that may affect the identified resource and notify the City of Ceres Building and Planning Department. The project applicant shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1995). The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, coordination of museum storage for any specimen recovered, and a report of findings. The recovery plan shall be submitted to the City for review. Recommendations in the recovery plan that are determined by the City to be necessary and feasible shall be implemented before construction activities affecting the resource can resume at the site where the paleontological resources were discovered.	Prior to issuance of grading permit and during construction	Project applicant(s) and/or contractor(s)		
3.7. Greenhouse Gas Emissions					
3.7-1a	**Reduce Construction-Related GHG Emissions.** The contractor(s) for projects proposed within the Specific Plan Area shall use electric and renewable fuel powered construction equipment and require renewable diesel fuel, where commercially available, and shall require construction vehicles to operate with the highest tier engines commercially available.	During construction	Contractor(s)		

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3.7-1b	**Reduce Operational GHG Emissions.** The following mitigation measures shall be implemented to reduce GHG emissions to an emissions rate per service population that would be consistent with the emissions rate for land use-related emissions needed to achieve the State's emission targets for 2030 (Executive B-30-15 and SB 32) and 2050 (Executive Order S-3-05): ▸ Projects proposed under the Specific Plan shall be consistent with the allowable densities and land uses specified in the Specific Plan and in the EIR Project description. ▸ Provide safe and convenient pedestrian and bicycle connections to the Central Park Blocks, to schools within the Specific Plan Area, and to existing and planned pedestrian/bicycle facilities along Whitmore Avenue and Moore Road, which connect to destinations in the vicinity of the Specific Plan Area. ▸ When project applications for projects located in the Specific Plan Area are deemed complete by the City, the City will communicate with Stanislaus Regional Transit and Ceres Area Transit to determine whether the Specific Plan Area can accommodate an extension of transit and whether an additional bus stop should be provided on the south side of Whitmore Avenue. If the City determines that a bus stop should be provided, projects shall be designed, as applicable, to accommodate the provision of a bus stop, a turnout, a bus shelter, bench, route information, and other appropriate amenities identified by the City, including shade, lighting, and trash receptacles. ▸ Provide EV-ready parking spaces with electric vehicle charging stations for at least 3% of the parking spaces provided in the HDR-designated area. Projects may propose alternative mitigation strategies to those listed above that are determined by the City to achieve a GHG emissions to an emissions rate per service population that would be consistent with the emissions rate for land use-related emissions needed to achieve the State's emission targets for 2030 (SB 32) and 2050 (Executive Order S-3-05). One alternative to accomplish this performance standard could be, for the life of the project, to participate in TID's B-Green Energy Program, which is a renewable energy program providing credits that are in excess of the legislatively mandated renewable portfolio standard. As an alternative, if the City has developed a greenhouse gas reduction program consistent with CEQA Guidelines Section 15183.5, projects proposed under the Specific Plan may demonstrate	Prior to approval of maps and projects proposed under the Specific Plan	Project applicant(s) and City of Ceres		

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	consistency with the City's greenhouse gas reduction program as alternative to implementing the mitigation measures listed above.				
3.8. Hazards and Hazardous Materials					
3.8-2	**Retain a Licensed Professional to Investigate Known or Unknown Hazards and Hazardous Materials and Implement Required Measures, as Necessary.** To reduce health hazards associated with potential exposure to hazardous substances, the project applicant and/or construction contractor(s) shall implement the following measures before the start of ground-disturbing activities within each phase of project development: ▸ Prepare a Phase I ESA covering all areas prior to development. If recommended by the Phase I(s), a Phase II ESA investigation is also required. ▸ If, during site preparation and construction activities, evidence of hazardous materials contamination is observed or suspected (e.g., stained or odorous soil or groundwater), construction activities shall cease immediately in the area of the find. If such contamination is observed or suspected, the contractor shall retain a qualified hazardous materials specialist to assess the site and collect and analyze soil and/or water samples, as necessary. If contaminants are identified in the samples, the contractor shall notify and consult with the appropriate federal, state, and/or local agencies. Measures to remediate contamination and protect worker health and the environment shall be implemented in accordance with federal, State, and local regulations before construction activities may resume at the site where contamination is encountered. ▸ Retain a licensed contractor to remove all domestic and irrigation wells in accordance with applicable local, State, and federal regulations, including the City of Ceres Municipal Code Chapter 13.05. ▸ Abandon all septic tanks on the project site under permit from the Stanislaus County Department of Environmental Resources. ▸ Prepare a Limited Phase II ESA to determine the presence and extent of any residual herbicides, pesticides, termiticides, and fumigants on historically-farmed land in agricultural areas that would be disturbed during construction of the proposed project. The soil sampling and analysis shall be conducted by a qualified Phase II Environmental Assessor. The Limited Phase II ESA shall document the areas proposed	Prior to issuance of grading permit	Project applicant(s) and/or contractor(s)		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	for sampling; the procedures for sample collection; the laboratory analytical methods to be used; and the pertinent regulatory threshold levels for determining proper excavation, handling, and, if necessary, treatment, or disposal of any contaminated soils. The Limited Phase II ESA shall be submitted to the City of Ceres for review and approval before the start of ground-disturbing activities. If samples reveal concentrations of pesticide residue in excess of acceptable thresholds, actions shall be taken to remediate soil contamination to within ASTM International standards. Such actions could include excavation and disposal of contaminated soils from the site or bioremediation. A qualified Phase II Environmental Assessor shall be retained to develop and carry out a remediation plan, if necessary. ▸ Retain a Cal-OSHA-certified Asbestos and/or Lead-Based Paint Inspector/Assessor before demolition of any on-site buildings to investigate whether any asbestos-containing material or lead-based paints are present, and could become friable or mobile during demolition activities. The construction contractor shall provide a completed San Joaquin Air Pollution Control District Asbestos Notification Form must be submitted to the district 10 working days before the activity begins. If any materials containing asbestos or lead are found, they shall be removed by an accredited contractor in accordance with CCR 17 Section 36000 and 36100 (lead based paint) and Section 39658(b)(1) of the Health and Safety Code (asbestos). In addition, all activities (construction or demolition) in the vicinity of these materials shall comply with EPA, Cal-OSHA, and San Joaquin Air Pollution Control District standards. The materials containing asbestos and lead shall be disposed of properly at an appropriately permitted off-site disposal facility.				
3.8-4	**Provide Real Estate Disclosure of Presence of Modesto City-County Airport.** Applicants shall prepare for review by the City a real estate disclosure noting the presence of the Modesto City-County Airport. This is required for proposed residential development in the northwestern corner of the Specific Plan Area, as shown in the ALUCP Map MOD-5 “Overflight Zones Policy Map,” or as this map may be updated in the future. This disclosure shall be presented to prospective homebuyers. In addition, the applicant shall prepare for review by the City a real estate disclosure describing noise attributable to aircraft overflight according to the latest available mapping of noise contours associated with the Modesto City-County Airport. This disclosure shall be	Prior to issuance of occupancy permit	Project applicant(s)		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	presented to prospective homebuyers.				
3.8-5	**Prepare and Implement a Construction Traffic Control Plan.** The project applicant(s) and/or construction contractor(s) shall prepare and implement traffic control plans for construction activities that may affect road rights-of-way during construction, in order to facilitate travel of emergency vehicles on affected roadways. The traffic control plan must follow applicable City of Ceres Improvement Standards (whichever edition is current as of the date of construction) and must be approved and signed by a professional engineer. Measures typically used in traffic control plans include advertising of planned lane closures, warning signage, a flag person to direct traffic flows when needed, and methods to ensure continued access by emergency vehicles. During project construction, access to the existing surrounding land uses shall be maintained at all times, with detours used, as necessary, during road closures. The traffic control plan shall be submitted to the City of Ceres Engineering Division for review and approval before the approval of improvement plans and issuance of building permits by the City of Ceres Building Division where roadway improvements may cause impacts on traffic. The traffic control plan shall be implemented throughout construction.	Prior to and during construction	Project applicant(s) and/or contractor(s)		
3.9. Hydrology and Water Quality					
3.9-1a	**Implement Mitigation Measure 3.6-3a (Prepare and Implement a Grading and Erosion Control Plan).**	Prior to issuance of grading permit and during construction	Project applicant(s) and/or contractor(s)		
3.9-1b	**Implement Mitigation Measure 3.8-2 (Prepare and Implement a Soil and Groundwater Sampling and Remediation Plan and Acquire Appropriate Regulatory Approvals).**	Prior to issuance of grading permit	Project applicant(s) and/or contractor(s)		
3.9-1c	**Prepare and Implement a Stormwater Pollution Prevention Plan and Associated Best Management Practices.** Prior to the start of earth-moving activities, each project applicant for a project within the Specific Plan Area shall obtain coverage under the SWRCB's NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ), including preparation and submittal of a project-specific stormwater pollution prevention plan (SWPPP) at the time the	Prior to issuance of grading permit and during construction	Project applicant(s) and/or contractor(s)		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	Notice of Intent to discharge is filed. The project applicant shall also prepare and submit erosion and sediment control and engineering plans and specifications for pollution prevention and control to the City of Ceres Engineering Division. The SWPPP shall identify and specify: ▸ the use of an effective combination of robust erosion and sediment control BMPs and construction techniques accepted by the City at the time of construction, that would reduce the potential for runoff and the release, mobilization, and exposure of pollutants, including legacy sources of mercury from construction sites. These may include, but would not be limited to temporary erosion control and soil stabilization measures, sedimentation ponds, inlet protection, perforated riser pipes, check dams, and silt fences; ▸ the implementation of approved local plans, non-stormwater management controls, permanent post-construction BMPs, and inspection and maintenance responsibilities; ▸ the pollutants that are likely to be used during construction that could be present in stormwater drainage and nonstormwater discharges, including fuels, lubricants, and other types of materials used for equipment operation; ▸ the means of waste disposal; ▸ spill prevention and contingency measures, including measures to prevent or clean up spills of hazardous waste and of hazardous materials used for equipment operation, and emergency procedures for responding to spills; ▸ personnel training requirements and procedures that would be used to ensure that workers are aware of permit requirements and proper installation methods for BMPs specified in the SWPPP; and ▸ the appropriate personnel responsible for supervisory duties related to implementation of the SWPPP. ▸ Where applicable, BMPs identified in the SWPPP shall be in place throughout all site work and construction activities and shall be used in all subsequent site development activities. BMPs may include, but are not limited to, such measures as those listed below. - Implementing temporary erosion and sediment control measures in disturbed areas to minimize discharge of sediment into nearby drainage conveyances, in compliance with state and local standards in effect at the time of construction. These measures may include, but are not				

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	limited to, silt fences, staked straw bales or wattles, sediment/silt basins and traps, geofabric, sandbag dikes, and temporary vegetation. - Establishing permanent vegetative cover to reduce erosion in areas disturbed by construction by slowing runoff velocities, trapping sediment, and enhancing filtration and transpiration. - Using drainage swales, ditches, and earth dikes to control erosion and runoff by conveying surface runoff down sloping land, intercepting and diverting runoff to a watercourse or channel, preventing sheet flow over sloped surfaces, preventing runoff accumulation at the base of a grade, and avoiding flood damage along roadways and facility infrastructure. A copy of the approved SWPPP shall be maintained and available at all times on the construction site.				
3.9-2	**Prepare and Submit a Final Drainage Plan and Implement Requirements.** Before the approval of grading plans and building permits, project applicants for projects proposed within the Specific Plan Area shall prepare and submit final drainage plans to the City of Ceres Engineering Division. The drainage plan shall demonstrate that off-site upstream runoff would be appropriately conveyed through the Specific Plan Area, and that Specific Plan-related on-site runoff would be appropriately contained in detention basins or managed through other improvements (e.g., source controls) to reduce flooding and hydromodfication impacts. The plan shall include, but not be limited to, the following items: ▸ a map dividing the site into discrete drainage management areas to show in each how runoff will be managed using site design measures, source controls, treatment controls, and hydromodification measures as defined by the current MS4 permit. ▸ site design measures, source controls, treatment controls, and hydromodification measures must be selected, sized, and situated in accordance with the guidance provided in the current MS4 permit and the City's Storm Water Design Standards Manual for New Development and Redevelopment; ▸ an accurate calculation of pre-project and post-project runoff scenarios, obtained using appropriate engineering methods consist with the City of Ceres Public Works Department Engineering Improvement Standards, that	Prior to issuance of grading permit and building permit and during construction	Project applicant(s)		

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				Compliance Verification	Date Completed
	accurately evaluates potential changes to runoff, including increased surface runoff; ▸ runoff calculations for the 10-year and 100-year (0.01 AEP) storm events (and other, smaller storm events as required) shall be performed and the trunk drainage pipeline sizes confirmed based on alignments and detention facility locations finalized in the design phase; ▸ a description of the proposed maintenance program for the on-site drainage system; ▸ identification of specifications for installing drainage systems consist with the City of Ceres Public Works Department Engineering Improvement Standards; ▸ a description of on-site features designed to treat Specific Plan Area or additional areawide development stormwater and maintain stormwater quality before it is discharged; and ▸ stormwater management BMPs that are designed to limit hydromodification. These may include, but are not limited to, the use of Low Impact Development (LID) techniques to limit increases in stormwater runoff at the point of origination (these may include, but are not limited to: surface swales; replacement of conventional impervious surfaces with pervious surfaces [e.g., porous pavement]; and impervious surfaces disconnection); Per Chapter 13.18 of the City of Ceres Municipal Code, a legally binding operation and maintenance agreement is required for maintenance of the installed post-construction design measures. The agreement shall be recorded with the deed by the County Clerk making it transferrable to the new owner; or, when there are multiple property owners responsible for the maintenance of the control measures, the agreement shall consist of a legally binding covenant between the City and the homeowners' association or maintenance district. The owner or association responsible for the maintenance of the control measures may be required by the City to submit an annual self-certification that the stormwater control measures are effective and are being maintained in accordance with the submitted and approved operation and maintenance plan.				
3.9-3	**Develop and Implement a Best Management Practice and Water Quality Maintenance Plan.** Before approval of the final subdivision map for projects proposed within	Prior to approval of the final	Project applicant(s)		

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	the Specific Plan, a detailed BMP and water quality maintenance plan shall be prepared by a qualified engineer retained by the project applicant. Drafts of the plan shall be submitted to the City of Ceres Engineering Division for review and approval concurrently with development of the final subdivision maps. The plan shall finalize the water quality improvements and further detail the structural and nonstructural BMPs proposed for the project. The plan shall include the following elements described below. ▸ A quantitative hydrologic and water quality analysis of proposed conditions incorporating the proposed drainage design features, which shall include final water quality basin sizing and design configuration. ▸ Pre-development and post-development calculations demonstrating that the proposed water quality BMPs meet or exceed requirements established by the City of Ceres and including details regarding the size, geometry, and functional timing of storage and release pursuant to the City of Ceres Public Works Department Engineering Improvement Standards. ▸ Source control programs to control water quality pollutants, which may include but are not limited to recycling, street sweeping, storm drain cleaning, household hazardous waste collection, waste minimization, prevention of spills and illegal dumping, and effective management of public trash collection areas. ▸ A pond management component for the proposed detention basin that shall include management and maintenance requirements for the design features and BMPs, and responsible parties for maintenance and funding. ▸ LID control measures shall be integrated into the BMP and water quality maintenance plan. These may include, but are not limited to: - surface swales; - replacement of conventional impervious surfaces with pervious surfaces (e.g., porous pavement); - impervious surfaces disconnection; and - trees planted to intercept stormwater.	subdivision map and during construction			
3.9-4a	**Implement Mitigation Measure 3.9-2 (Prepare and Submit Final Drainage Plans and Implement Requirements Contained in Those Plans).**	Prior to issuance of grading permit and building permit and during	Project applicant(s)		

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
		construction			
3.9-4b	**Implement Mitigation Measure 3.9-3: (Develop and Implement a Best Management Practice and Water Quality Maintenance Plan).**	Prior to approval of the final subdivision map and during construction	Project applicant(s)		
3.11. Noise and Vibration					
3.11-1	**Reduce Construction Noise.** ▸ Where feasible, construction traffic shall avoid routes directly adjacent to noise-sensitive land uses, including Roeding Road between Moore Road and Faith Home Road and More Road between Whitmore Avenue and Roeding Road. ▸ The project applicant(s) and contractor(s) of all project phases shall implement the following measures to minimize noise impacts for all on- and off-site construction within 500 feet of any noise-sensitive land use. ▸ Limit noise-generating construction operations to the hours of 7 a.m.-8 p.m. (daytime). ▸ Locate fixed/stationary equipment (e.g., generators, compressors) as far as possible from noise-sensitive receptors. Shroud or shield all impact tools, and muffle or shield all in-take and exhaust ports on powered construction equipment. ▸ Store and maintain equipment as far as possible from noise-sensitive receptors. ▸ Properly maintain and equip all construction equipment with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment-engine shrouds shall be closed during equipment operation. ▸ Shut down all motorized construction equipment when not in use to prevent excessive idling noise. ▸ Construct acoustic barriers (e.g., plywood, sound attenuation blankets) to reduce construction-generated noise levels at affected noise-sensitive land uses. The barriers shall be designed to obstruct the line of sight between the noise-sensitive land use and construction equipment.	During construction	Project applicant(s) and/or contractor(s)		
3.11-3	**Reduce Transportation Noise Exposure Consistent with the Ceres 2035**	Prior to	Project applicant(s)		

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
	General Plan. The project applicant(s) and contractor(s) for proposed residential development along Whitmore Avenue that could be exposed to transportation noise levels in excess of City noise policies shall incorporate one or both of the following strategies to ensure noise exposure levels that are consistent with the Ceres 2035 General Plan: ▸ Provide site planning and design strategies demonstrated to achieve acceptable or conditionally acceptable exterior noise exposure policies. This can include placing distance between outdoor gathering spaces and Whitmore Avenue, placement of buildings between Whitmore Avenue and outdoor gathering spaces associated with proposed residential uses, or other approaches that are demonstrated to achieve acceptable or conditionally acceptable exterior noise exposure policies in the Ceres 2035 General Plan. ▸ Construct sound walls along the affected roadways, between the Specific Plan Area and the roadways with noise levels above 65 dB L_{dn}. After all practical site planning and design strategies are exhausted, the City may allow construction of sound walls along the south side of Whitmore Avenue, if needed, to achieve acceptable or conditionally acceptable exterior noise exposure policies in the Ceres 2035 General Plan. Soundwalls should be high enough to cut the line of sight between the roadway and outdoor gathering areas.	approval of improvement plans	and/or contractor(s)		
3.11-4	**Reduce Stationary Noise Source Exposure.** ▸ Noise generating mechanical equipment shall be shielded or located at a distance that would reduce noise levels at any existing or planned noise-sensitive outdoor activity areas to acceptable levels, as directed by the Ceres 2035 General Plan. ▸ Residential air conditioning units shall be located a minimum of 10 feet from adjacent residential dwellings, including outdoor activity areas, or shall be shielded or designed to reduce operational noise levels at adjacent dwellings. Shielding may include the use of fences or partial equipment enclosures. To provide effectiveness, fences or barriers shall be continuous or solid, with no gaps, and shall block the line of sight to windows of neighboring dwellings. ▸ Include site planning and design strategies, such as orientation of homes toward Cesar Chavez Junior High School with outdoor gathering areas	Prior to approval of building permit	Project applicant(s) and/or contractor(s)		

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
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	placed behind proposed homes in order to reduce noise exposure, consistent with the Ceres 2035 General Plan noise policies.				
3.11-5	**Implement Measures to Reduce Impacts Associated with Groundborne Noise and Vibration.** The project applicant(s) and contractor(s) of all development phases under the Specific Plan shall implement the following measures to reduce impacts associated with groundborne noise and vibration: ▸ Vibration-generating construction operations shall occur greater than 100 feet from occupied vibration-sensitive receptors (e.g., residences, schools) or as far as feasible from sensitive receptors. ▸ All construction equipment and equipment staging areas shall be located as far as possible from nearby vibration-sensitive land uses.	During construction	Project applicant(s) and/or contractor(s)		
3.13. Public Services & Utilities, Including Recreation and Energy					
3.13-1	**Demonstrate Payment of Public Facilities Fee and Annexation into a Community Facilities District.** Prior to the issuance of any building permit, the project applicants for projects proposed under the Specific Plan shall pay to the City the fees adopted by Chapter 16.08 of the City of Ceres Municipal Code. The fee shall be determined by the fee schedule in effect on the date the building permit application is submitted and deemed complete by City staff. Per Chapter 13.46 of the City of Ceres Municipal Code, projects applicants for projects proposed under the Specific Plan shall be required, before the approval of final maps, to participate in the establishment of a community facilities district for the purpose of imposing a residential service operations fee, or if such district has been previously established, to annex the proposed residential project to the existing district. The community facilities district shall be established, or properties shall be annexed to an existing district, pursuant to the provisions of California Government Code Sections 53318, et seq. The precise amount of the annual residential services operations fee to be levied against those properties included within the district shall be determined at the time of the initial formation of the district and in accordance with the statutes and laws applicable to the levying of such fees.	Prior to issuance of building permit and prior to approval of final maps	Project applicant(s)		
3.13-2	**Implement Mitigation Measure 3.13-1 (Demonstrate Payment of Public Facilities Fee and Annexation into a Community Facilities District).**	Prior to issuance of building permit	Project applicant(s)		

Mitigation Monitoring and Reporting Program for the Whitmore Ranch Specific Plan					
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				Compliance Verification	Date Completed
		and prior to approval of final maps			
3.13-6	**Prepare and Submit A Water Supply Conveyance Improvement Plan in Compliance with Applicable Standards and Construct Water Supply Conveyance Infrastructure Prior to Occupancy.** Projects applicants for projects proposed under the Specific Plan shall prepare a detailed water conveyance infrastructure improvement plan that depicts the locations and appropriate sizes of all required conveyance infrastructure, in conjunction with other site-specific improvement plans. Proposed on-site water facilities shall be designed and sized to provide adequate service to the project site for the amount of development identified in the tentative subdivision map, based on City of Ceres Improvement Standards. A final water conveyance infrastructure improvement plan shall be approved by the City of Ceres Engineering Division before approval of the final subdivision map and issuance of building permits from the City of Ceres Planning and Building Division. All required infrastructure shall be in place prior to occupancy of development anticipated under the proposed project.	A final water conveyance infrastructure improvement plan shall be approved by the City of Ceres Engineering Division before approval of the final subdivision map and issuance of building permits from the City of Ceres Planning and Building Division. All required infrastructure shall be in place prior to occupancy of development anticipated under the proposed project.	Project applicant(s)		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
3.13-7	**Prepare and Submit A Wastewater Conveyance Improvement Plan in Compliance with Applicable Standards and Construct Wastewater Conveyance Infrastructure Prior to Occupancy.** Project applicants for projects proposed under the Specific Plan shall prepare a detailed wastewater infrastructure improvement plan that depicts the locations and appropriate sizes of all required conveyance infrastructure in conjunction with other site-specific improvement plans. Proposed on-site wastewater facilities shall be designed and sized to provide adequate service to the project site for the amount of development identified in the tentative subdivision map based on the City's Sewer System Management Plan and the City's Improvement Standards. A final wastewater infrastructure improvement plan shall be approved by the City of Ceres Engineering Division before approval of the final subdivision map by the City Council. All required infrastructure shall be in place prior to occupancy of development anticipated under the proposed project.	A final wastewater infrastructure improvement plan shall be approved by the City of Ceres Engineering Division before approval of the final subdivision map by the City Council. All required infrastructure shall be in place prior to occupancy of development anticipated under the proposed project.	Project applicant(s)		
3.13-11	**Collaborate with Utility Providers to Prepare Utility Service Plans for Electrical and Natural Gas Services and Submit Written Verification to the City that Adequate Infrastructure is Available before Approval of a Final Subdivision Map.** The project applicant(s) shall prepare a utility service plan that identifies the electrical and natural gas infrastructure sizing and locations to serve proposed development. The project applicant(s) shall submit to the City written verification that TID has adequate electrical infrastructure and PG&E has adequate natural gas supplies and infrastructure available for the amount of proposed development before issuance of building permits.	Prior to issuance of building permit	Project applicant(s)		
3.14. Transportation					
3.14-1a	**Widen Whitmore Avenue to Four Lanes.**	Prior to issuance of	Project applicant(s)		

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				Compliance Verification	Date Completed
	If this has not occurred as a part of a separate project, the Specific Plan applicant shall cause the segment of Whitmore Avenue from Della Drive to Cesar Chavez Junior High School to be widened to 4 lanes before 44 percent of the dwelling units are occupied within the Specific Plan Area, or as directed by the City of Ceres. If this improvement is pursued under a different project, future projects under the Specific Plan shall contribute a fair share to the widening of Whitmore Avenue.	building permit representing 44 percent of the total housing units in the Specific Plan Area			
3.14-1b	**Improvements for Full Buildout of the Specific Plan Area.** Specific Plan traffic volumes have been compared to MUTCD peak-hour warrants, and the results are noted in Table 12 of Appendix F. As indicated the same locations that satisfy warrants under existing conditions do so with the implementation of the Specific Plan. However, as noted previously, signalization is not necessary the preferred action at each location. Alternatives for improving the LOS at study intersections have been evaluated and a preferred plan has been developed that will improve the LOS. Implementation of the following improvements is recommended to provide acceptable, LOS D or better operations: ▸ The Specific Plan applicant shall cause the construction of a barrier at the Whitmore Avenue / Moore Road intersection to prohibit northbound left turns when directed by the City of Ceres. ▸ The Specific Plan applicant shall cause the construction of a barrier at the Whitmore Avenue / Lunar Drive intersection to prohibit northbound and southbound left turns and cross traffic when directed by the City of Ceres. The Specific Plan applicant shall cause the construction of a signalized intersection with separate left turn lanes at the Whitmore Avenue / Boothe Road intersection before 10 percent of the Specific Plan's dwelling units are occupied or when directed by the City of Ceres.	When directed by the City of Ceres			
3.14-1c	**Improvements at Mitchell Road / Whitmore Avenue Intersection.** The City's impact fee program includes funds for improving Mitchell Road to a 6-lane facility. This improvement will result in LOS D or better conditions. Implementation of the following improvements is recommended to provide acceptable, LOS D or better operations: ▸ The Specific Plan applicants shall contribute their fair share towards the cost of constructing an additional through- lane in each direction on Mitchell Road by paying adopted traffic impact mitigation fees.	Prior to issuance of building permit	Project applicant(s)		

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Mitigation Number	Mitigation Measure	Timing/Schedule	Implementation Responsibility	Completion of Implementation	
				Compliance Verification	Date Completed
3.14-4a	**Construct Pedestrian Facility.** Implementation of the following improvement is recommended to provide adequate pedestrian facilities: ▸ The Specific Plan applicant shall cause an all-weather pedestrian facility to be constructed on the south side of the segment of Whitmore Avenue from Della Drive to Cesar Chavez Junior High School before 44 percent of the dwelling units are occupied within the Specific Plan Area, or as directed by the City of Ceres.	Prior to issuance of building permit representing 44 percent of the total housing units in the Specific Plan Area	Project applicant(s)		
3.14-4b	**Construct Transit Facility.** The City PFF program includes constructing the bus-pull outs at the Whitmore Avenue/ Boothe Road intersection. Implementation of the following improvements is recommended to provide adequate transit facilities: ▸ The Specific Plan applicant shall cause a bus pull-out to be constructed at the Whitmore Avenue / Boothe Road intersection.	Prior to occupancy for housing units adjacent to this location	Project applicant(s)		
5-1	**Implement Roadway Improvements.** The project applicant(s) shall implement the following roadway improvements: ▸ Contribute on a cumulative fair-share basis to the signalization for the Roeding Road / Moore Road intersection when directed by the City of Ceres. ▸ Construct a signalized intersection with separate northbound left turn lane at the Whitmore Avenue / Boothe Road intersection before 10 percent of Specific Plan's dwelling units are occupied, when Boothe Road is extended south from Whitmore Avenue, or when directed by the City of Ceres. ▸ Construct an "overlap" phase for the southbound right-turn lane at the Whitmore Avenue / Mitchell Road intersection when directed by the City of Ceres. ▸ Construct a barrier at the Whitmore Avenue / Moore Road intersection to prohibit northbound left turns after construction of the Eastgate Boulevard extension when directed by the City of Ceres. ▸ Construct a barrier at the Whitmore Avenue / Lunar Drive intersection to prohibit northbound and southbound left turns after construction of the	Prior to issuance of building permit for fair-share contributions and as directed by the City of Ceres for the construction elements	Project applicant(s)		

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				Compliance Verification	Date Completed
	Whitmore Avenue / Boothe Road intersection when directed by the City of Ceres. ▸ Contribute their fair share the cost of constructing a dual northbound left-turn lane at the Mitchell Road / Whitmore Avenue intersection. ▸ Contribute their fair share the cost of widening the Mitchell Road to 6 lanes.				

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