

**FINAL
ENVIRONMENTAL IMPACT REPORT**

FOR THE

NORTH POINTE SPECIFIC PLAN

in the City of Ripon
between Jack Tone Road and Fulton Avenue
Ripon, CA

June 30, 2015



Prepared for:

CITY OF RIPON
Community Development Department
259 N Wilma Avenue
Ripon, CA 95366
(209) 599-2108

FINAL
ENVIRONMENTAL IMPACT REPORT

FOR THE

NORTH POINTE SPECIFIC PLAN
in the City of Ripon
between Jack Tone Road and Fulton Avenue
Ripon, CA

June 30, 2015

Prepared for:

CITY OF RIPON
Community Development Department
259 N Wilma Avenue
Ripon, CA 95366
(209) 599-2108

Prepared by:

BASECAMP ENVIRONMENTAL
6653 Embarcadero Drive, Suite A
Stockton, CA 95219

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION	1-1
2.0 SUMMARY TABLE	2-1
3.0 COMMENTS AND RESPONSES	3-1
4.0 ERRATA	4-1

APPENDICES

Appendix A Public Review Notices And Transmittals

LIST OF FIGURES

1-1	Regional Location and Vicinity	1-3
1-2	USGS Map	1-4
1-3	Aerial Photo	1-5
1-4	Assessor's Parcels	1-6
1-5	Land Use Plan	1-7

TABLES

2-1	Summary of Impacts and Mitigation Measures	2-2
-----	--	-----

1.0 INTRODUCTION

This Final Environmental Impact Report (FEIR) describes the potential environmental effects that would result from the City of Ripon's approval of the North Pointe Specific Plan (NPSP) project. The NPSP project, CEQA requirements applicable to preparation of a Final EIR and CEQA findings requirements that will need to be met in conjunction with approval of the project are described in the following sections.

1.1 PROJECT BRIEF

The proposed project is the North Pointe Specific Plan (NPSP), which consists of several interrelated City approvals and other actions that would together promote and guide the development of new urban commercial and residential land uses on undeveloped or under-developed lands located within the 310-acre specific plan area. The specific plan area (the “project site”) is located within the City of Ripon city limits, immediately north of SR 99 and within the North Pointe Planning District (Figures 1-1 through 1-5).

Total potential development pursuant to the adopted specific plan would include 1,050 new single- and multi-family residential units and a projected 1.7 million square feet of new commercial/non-residential development. Although much of the urban infrastructure required to support future development has already been constructed within the project site, future development will include needed streets, utilities and other infrastructure.

1.2 NORTH POINTE SPECIFIC PLAN FINAL EIR

A Draft Environmental Impact Report (DEIR) for the NPSP was prepared by the City of Ripon and circulated for a 45-day agency and public comment period extending from May 1, 2015 until June 15, 2015. Copies of the public review distribution list, legal notices and transmittal documents are shown in Appendix A.

The FEIR for the NPSP project has been prepared pursuant to the requirements of CEQA and the CEQA Guidelines. CEQA Guidelines Section 15132 specifies the content of a Final EIR as:

- The Draft EIR or a revision of the draft
- Comments and recommendations received on the Draft EIR, either verbatim or in summary
- A list of persons, organizations, and the public agencies commenting on the Draft EIR
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process

- Any other information added by the Lead Agency.

The DEIR, cited below, is hereby incorporated into the Final EIR by reference. Copies of the DEIR are available for review at the City of Ripon, 259 N Wilma Avenue, Ripon, CA 95366, and on the City's web site:

<http://www.cityofripon.org/Home/PDF/NPSP%20DRAFT%20EIR.pdf>

City of Ripon. Public Review Draft, Environmental Impact Report for the North Pointe Specific Plan, in the City of Ripon. State Clearinghouse Number 2015052005. May 1, 2015.

This Final EIR contains a summary of the environmental effects of the project, which is drawn from the DEIR (Section 2.0). A list of comments received during the public review period and the City's responses to the comments received are shown in Section 3.0. The Errata Section (4.0) shows any revisions to the DEIR that have been made in response to the comments received as well as any other minor changes and corrections to the document identified by City staff.

This Final EIR, when combined with the public review draft of the EIR, constitutes the complete environmental review document for the NPSP Project. The Final EIR will be considered by the City of Ripon Planning Commission and City Council before the Commission and Council make their respective decisions on the project.

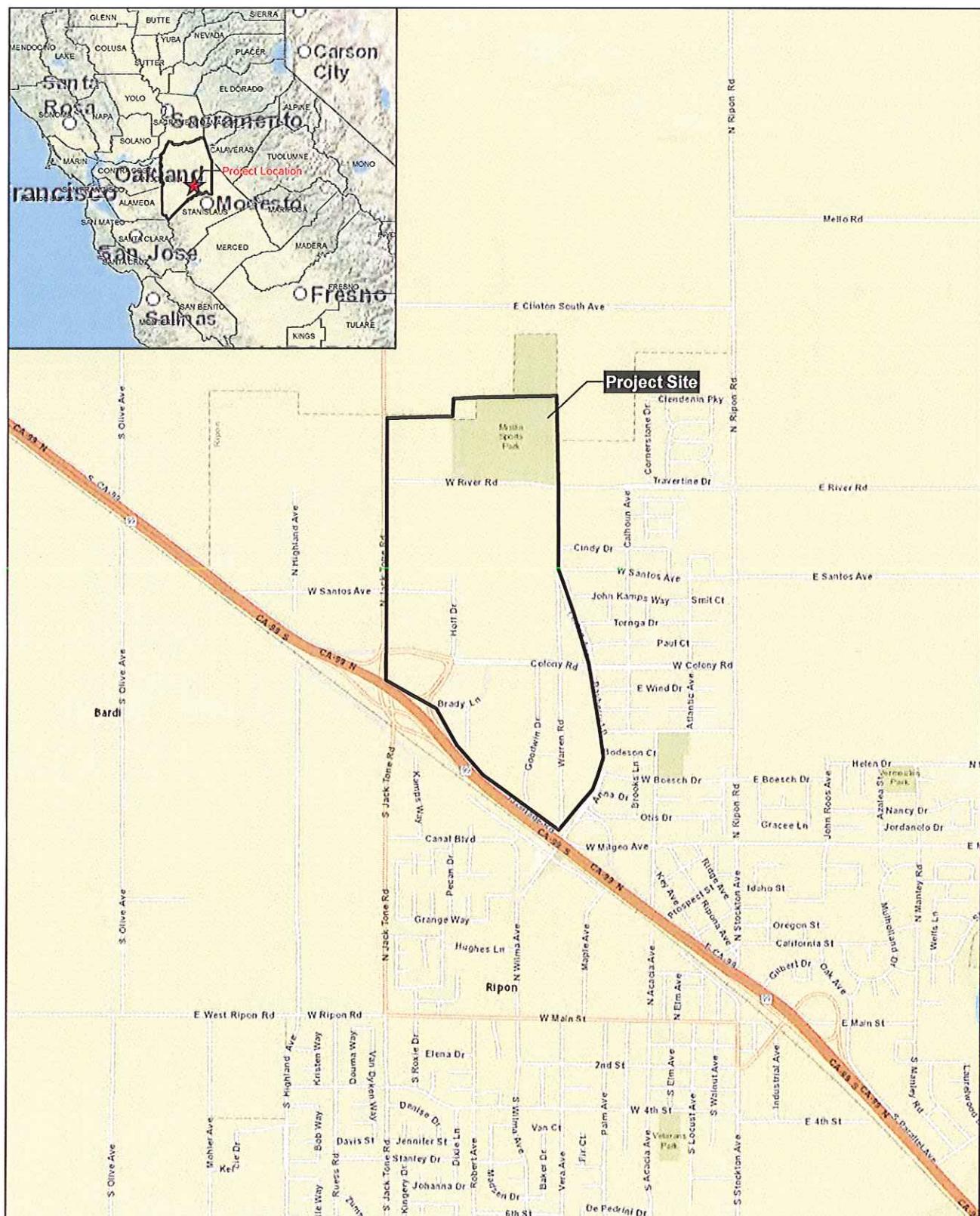


FIGURE 1-1
Regional Location
and Vicinity

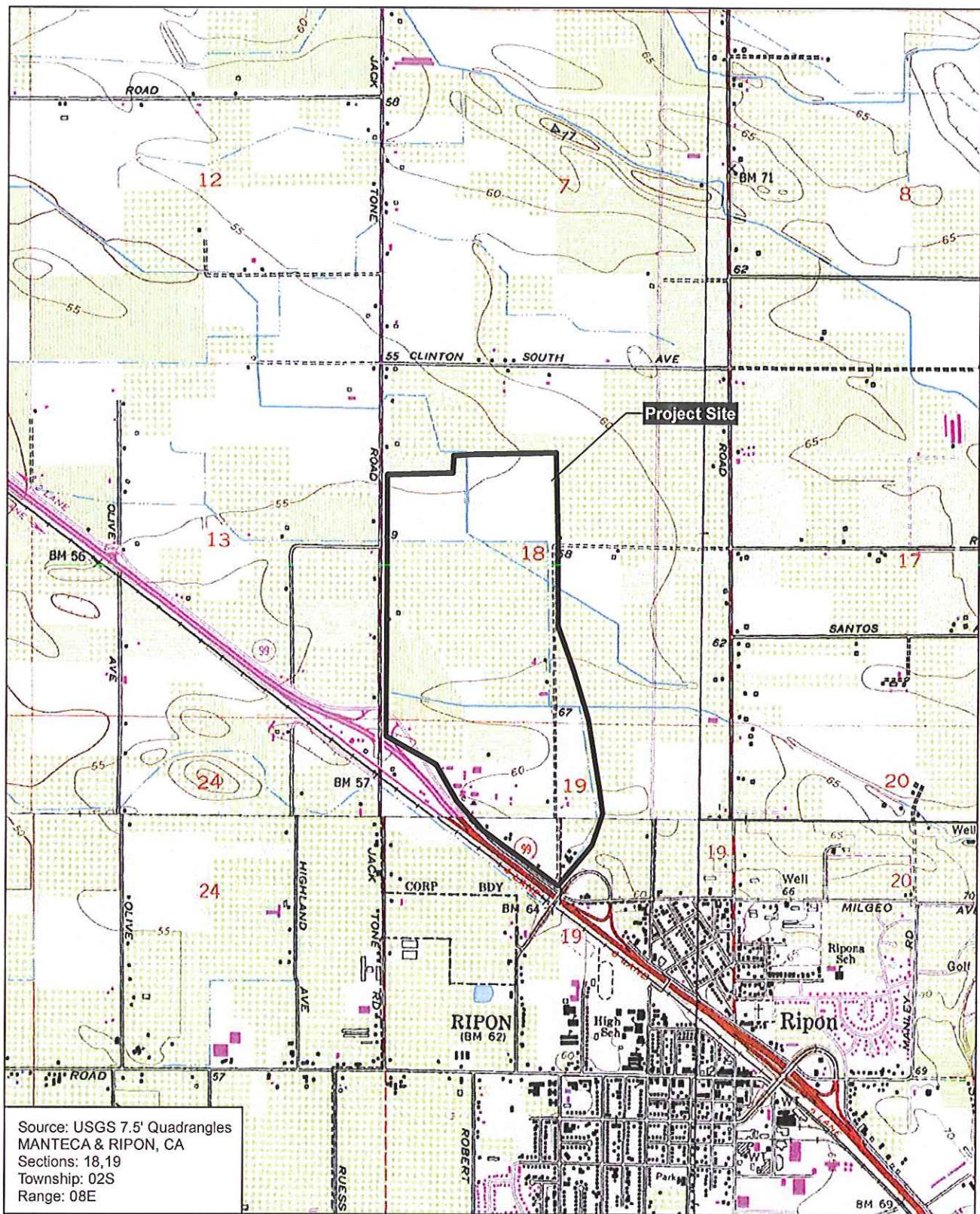


FIGURE 1-2
USGS Map

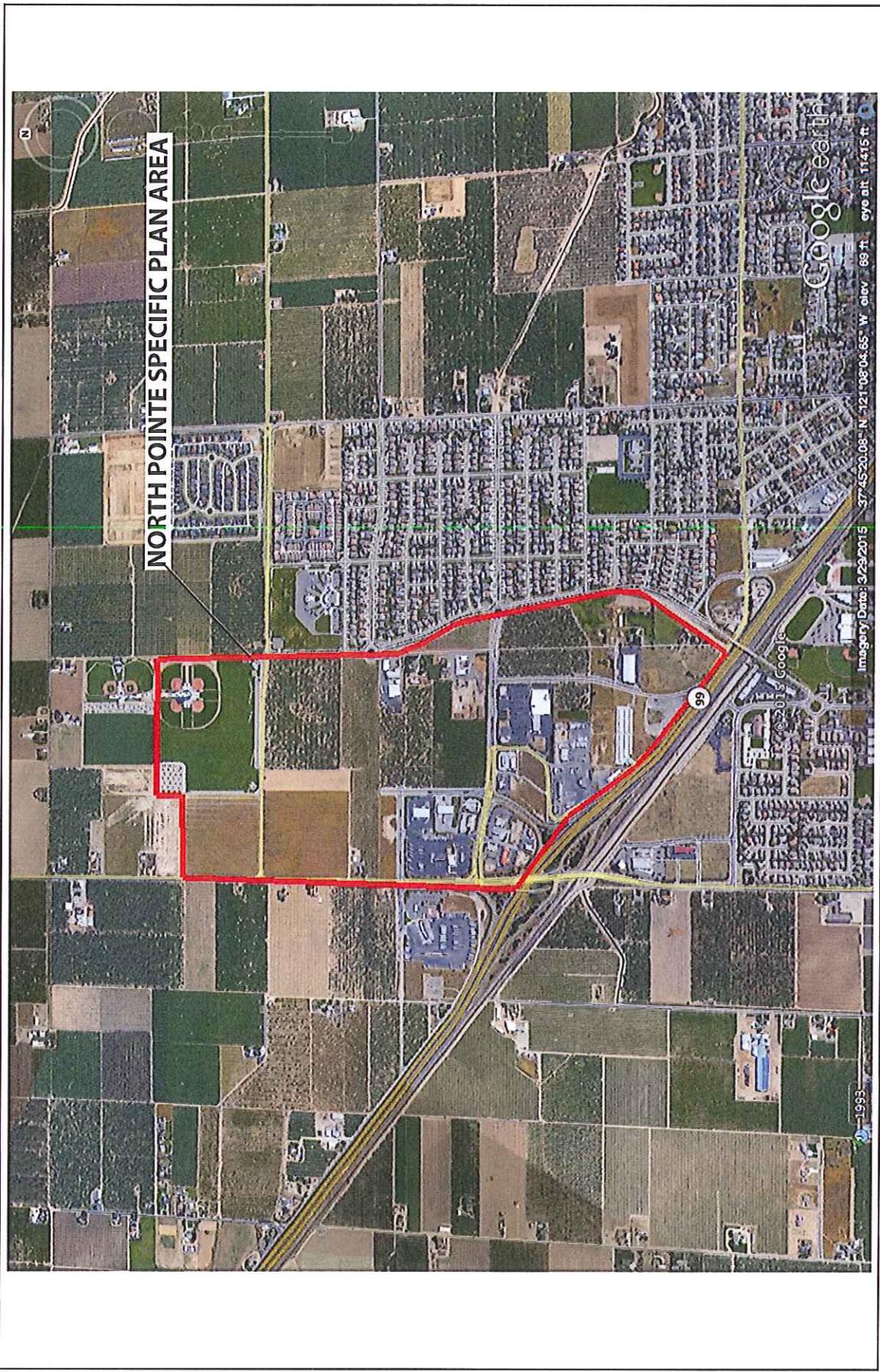
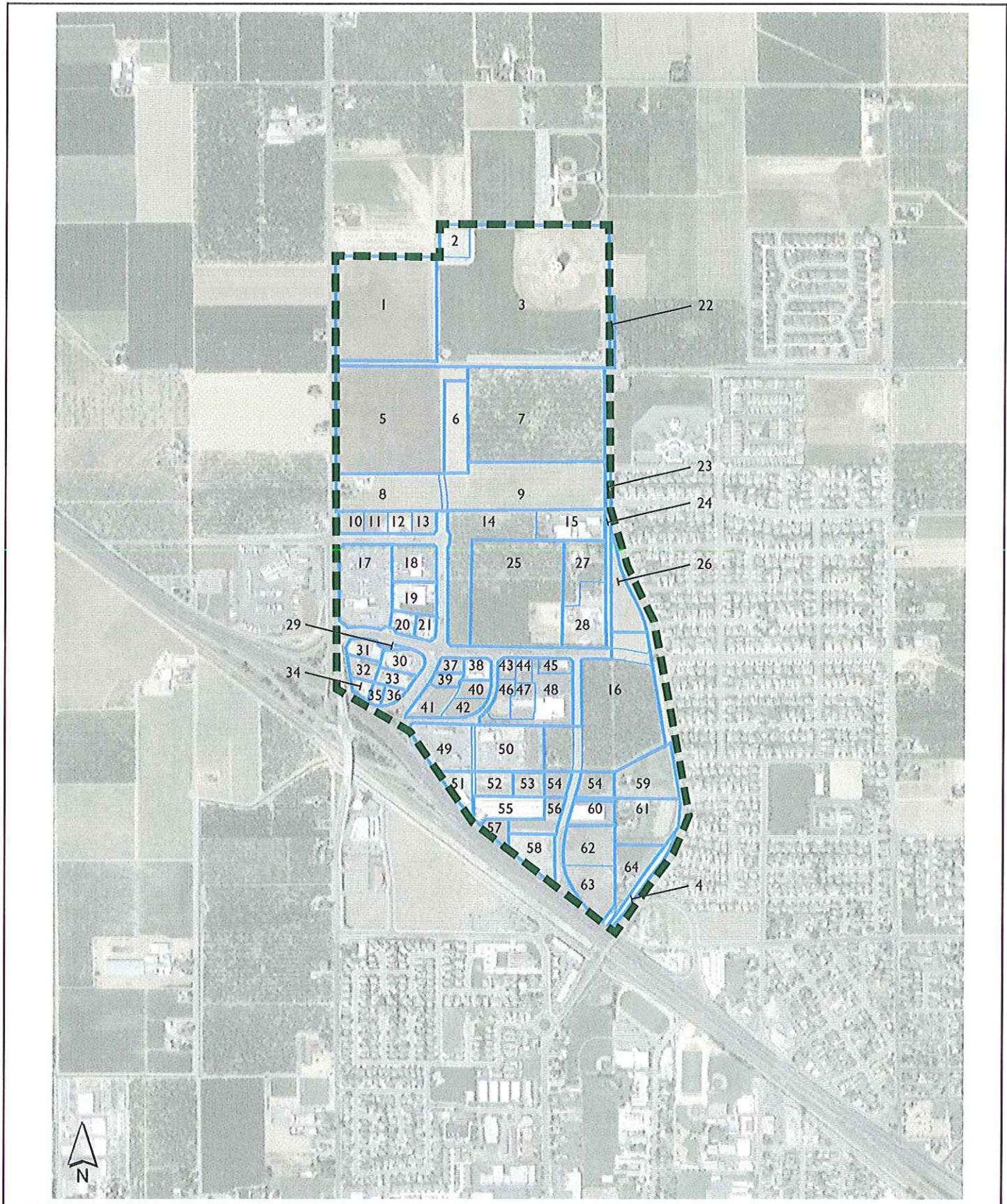


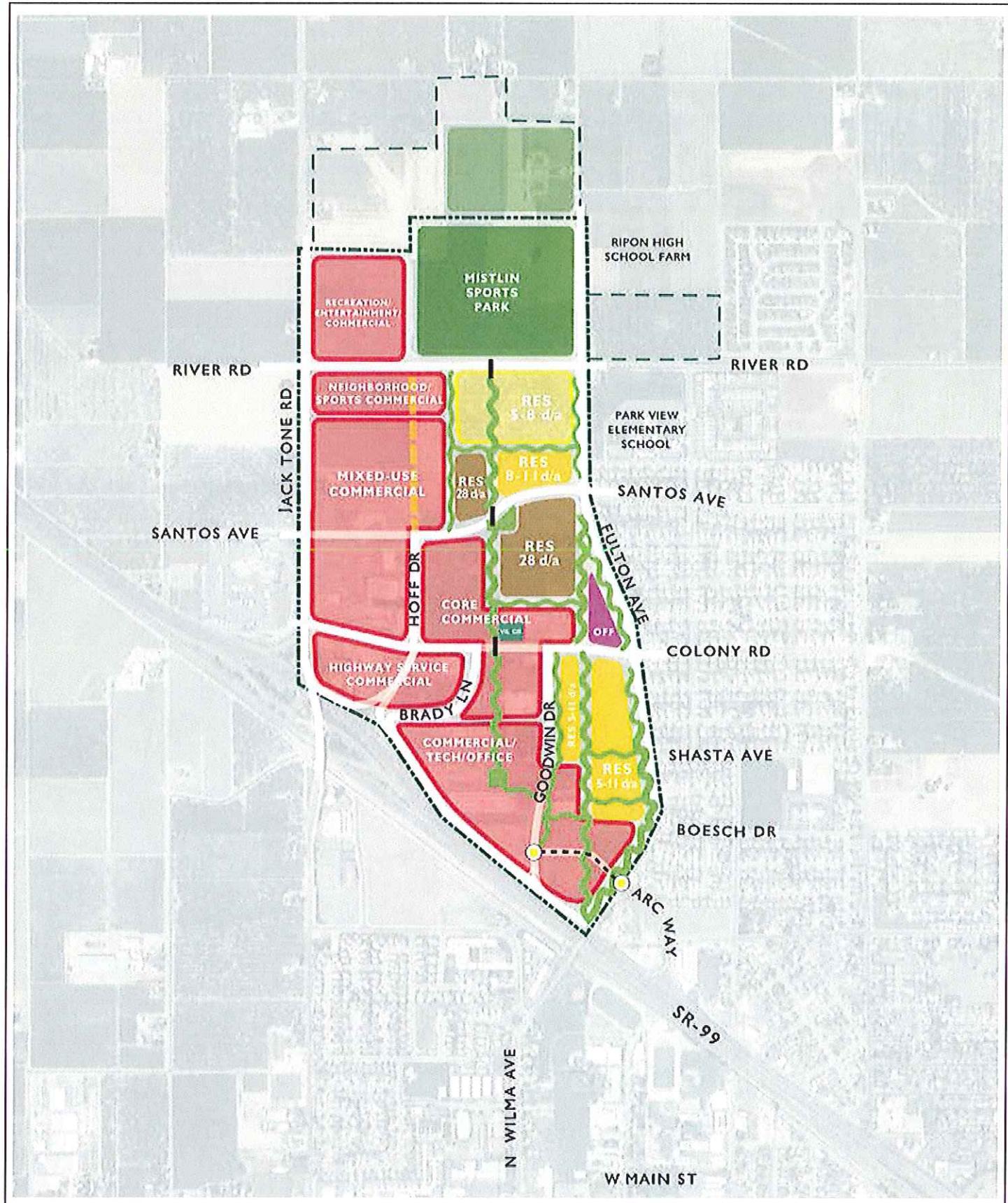
FIGURE 1-3

AERIAL PHOTO



Note: DETAILED PARCEL DATA IS PROVIDED IN TABLE 2-1

FIGURE 1-4
ASSESSOR'S PARCELS



2.0 SUMMARY TABLE

The following pages display Table 2-1, Summary of Impacts and Mitigation Measures. The table is drawn from the DEIR was circulated for public review; however, the table may contain minor revisions needed to respond to any comments submitted by agencies and the public, or other changes directed by City staff. Any changes that have been made to the table since the publication of the DEIR on May 1, 2015 are shown in underline (additions) and ~~strikeout~~ (deletions). These changes are explained or documented as required in the subsequent sections of this Final EIR: Section 3.0 Responses to Comments, and Section 4.0 Errata.

The potential environmental effects of the proposed project are summarized in the first column of this table. The level of significance of the potential impact is indicated in the second column, mitigation measures proposed to minimize the impacts are shown in the third column, and the significance of the impact, after mitigation measures are applied, is shown in the fourth column.

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
4.0. AESTHETICS			
AESTH 1: Effects on Scenic Vistas	LS	None required.	
AESTH 2: Effects on Scenic Routes and Resources	LS	None required.	
AESTH 3: Effects on the Visual Character or Quality of the Site and its Surroundings	LS	None required.	
AESTH 4: Light and Glare	LS	None required.	
5.0. AGRICULTURE			
AGRI 1: Conversion of Important Agricultural Land	NA	NA	
AGRI 2: Agricultural Land Use Conflicts	LS	None required.	
AGRI 3: Conflicts with Agricultural Zoning and Williamson Act Contracts	NE	None required.	
6.0. AIR			
AIR 1: Emissions from Project Construction	LS	None required.	
Air 2: Criteria Pollutant Emissions from Project Operations	N/A	None required.	
AIR 3: Carbon Monoxide Hot Spots	LS	None required.	
AIR 4: Generation of or Exposure to Air Toxics (TACs)	LS	None required.	
AIR 5: Odor Generation and Exposure	LS	None required.	
7.0. BIOLOGICAL RESOURCES			
BIO 1: Loss of Special-Status Plants and Wildlife	LS	None required.	
BIO 2: Impacts on Riparian Areas, Wetlands and Waters of the U.S.	NE	None required.	
BIO 3: Impact on Fish or Wildlife Migration, Wildlife Nursery Sites	NE	None required.	

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures		Significance After Mitigation Measures
BIO 4: Impacts on Local Policies and Ordinances, Heritage Oaks	LS	None required.		
BIO 5: Conflict with Adopted Habitat Conservation Plan or Natural Community Conservation Plan	NE	None required.		
8.0. CULTURAL RESOURCES				
CULT 1: Potential Impacts on Historic Resources	PS	CULT 1.1	For any future urban development projects that propose the demolition of any of the existing ten residences located within the NPSP area, project proponents will be required to have each of these structures evaluated by a qualified historian to determine eligibility for listing on the National Register of Historic Places and/or the State Register of Historic Resources.	LS
		CULT 1.2	So that potential archaeological or paleontological materials encountered during construction activity can be identified, the developer or contractor shall provide training of field personnel in identification procedures prior to construction work. The training would a mandatory pre-field meeting in which a professional archaeologist would review with equipment operators the natural and cultural history of the NPSP area, archaeological sensitivity, the most likely locations of buried cultural materials, if any, and what kinds of cultural materials would be seen if prehistoric materials are in fact unearthed and specifically how to address such discoveries and what immediate actions to take, particularly if human remains are found.	
CULT 2: Potential Impacts on Prehistoric Cultural Resources	PS	CULT 2.1	Lands proposed for development shall be subject to cultural resource survey, if not previously surveyed, by a qualified archaeologist. If important archaeological resources as defined by CEQA are identified, the archaeologist's recommendations for avoidance or mitigation to a less than significant level shall be made a requirement of the project.	LS
		CULT 2.2	So that potential archaeological materials encountered during construction activity can be properly identified, the developer or contractor shall provide training of field personnel in identification procedures prior to construction work. The training would a mandatory pre-field meeting in which a professional archaeologist would review with equipment operators the natural and cultural history of the NPSP area, archaeological sensitivity, the most likely locations of buried cultural materials, if any, and what kinds of cultural materials would be seen if prehistoric materials are in fact unearthed and specifically how to address such discoveries and what immediate actions to take, particularly if human remains are found.	
		CULT 2.3	If any subsurface cultural resources are encountered during future project construction, all construction activity in the vicinity of the encounter shall cease until a qualified archaeologist examines the materials, determines their significance, and recommends mitigation measures that would reduce potentially significant impacts to a less than significant level, in accordance with CEQA. The City of Ripon shall be immediately notified of the discovery and the Developer or its contractor shall be responsible for retaining a qualified archaeologist and for implementing recommended mitigation measures.	
		CULT 2.4	If human remains are encountered at any time during future project construction, all construction activity in the vicinity of the encounter shall cease, and the County Coroner and the City of Ripon shall be notified immediately. The Coroner will contact the Native American Heritage Commission if the remains have been identified as being of Native American descent. The City	

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures		Significance After Mitigation Measures
		<p>shall require the developer or its contractor to implement the requirements of the CEQA Guidelines with respect to human remains of Native American origin. The City of Ripon shall require the developer or its contractor to retain a qualified archaeologist to evaluate the archaeological importance of the find and recommend any mitigation measures needed to reduce any potentially significant effects to a less than significant level under CEQA. The developer shall be required to implement those recommendations.</p>		
CULT 3: Impacts on Paleontological Resources	PS	CULT 3.1	If paleontological resources are encountered during project construction, construction activity in the vicinity of the encounter shall cease until a qualified paleontologist examines the materials, determines their significance under CEQA, and recommends mitigation measures that would be necessary to reduce potentially significant effects to a less than significant level, in accordance with CEQA. The City of Ripon shall be immediately notified of the discovery. The developer or its contractor shall be responsible for retaining a qualified paleontologist and for implementing recommended mitigation measures.	LS
9.0. GEOLOGY AND SOILS				
GEO 1: Exposure of Improvements and Future Residents to Fault Rupture, Seismic Shaking or Seismically-Induced Failure	LS		None required.	
GEO 2: Impacts on Soil Erosion	PS		Refer to mitigation measures, as described in Chapter 11.0, Hydrology and Water Quality.	LS
GEO 3: Exposure to or Effects on Unstable Geologic Units or Soils	LS		None required.	
GEO 4: Expansive Soils	LS		None required.	
GEO 5: On-Site Wastewater Disposal Impacts	NE		None required.	
GEO 6: Effects on Mineral and Energy Resources	LS		None required.	
10.0 GREENHOUSE GAS EMISSIONS				
GHG 1: GHG Emissions from Construction	LS		None required.	
GHG 2: Greenhouse Gas Emissions from Project Operations	LS		None required.	
GHG 3: Consistency with Applicable Greenhouse Gas Plans and Policies	LS		None required.	
GHG 4: Exposure to Global Climate Change Impacts	LS		None required.	

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures			Significance After Mitigation Measures
11.0 HEALTH AND SAFETY					
HAZ 1: Hazardous Material Transportation	LS		None required.		
HAZ 2: Electrical Transmission Lines and EMF Hazards	LS		None required.		
HAZ 3: Waterways	PS	HAZ 3.1	Applicants for new development shall consult with SSJID during application processing and construct improvements or provide funding for improvements to the canal, including undergrounding, needed to protect public safety.		LS
HAZ 4: Hazardous and Toxic Materials and Sites	PS	HAZ 4.1	Redevelopment of previously-developed sites shall be preceded by a Phase I Environmental Site Assessment. Project approval shall include requirements for completion of any Phase II remediation needed to permit the proposed use under existing applicable regulations prior to project approval.		LS
		HAZ 4.2	Development on or near the former Ripon Farm Services site shall include preservation of rights of access to and operation of wells and equipment needed to remediate existing groundwater contamination.		
		HAZ 4.3	If evidence of unusual odors or soil discoloration is noted during construction, construction shall be halted and the City notified. The property owner or responsible party shall contact a qualified environmental professional to evaluate the situation and take action as required by applicable environmental regulations.		
		HAZ 4.4	Remaining existing wells within the NPSP area shall be abandoned in accordance with local and state agency regulations prior to development.		
		HAZ 4.5	Demolition permits shall be obtained from the City for structures to be removed from development sites. Permit applications for uses regulated shall include a Demolition Permit Release Form from the SJVAPCD.		
12.0. HYDROLOGY AND WATER QUALITY					
HYDR 1: Direct Impacts on Surface Water Features and Water Quality	LS		None required.		
HYDR 2: NPSP Effects on Groundwater Quantity	LS		None required.		
HYDR 3: Effects on Surface Water Quality	LS		None required.		
HYDR 4: Exposure to Flooding Hazards	LS		None required.		

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures		Significance After Mitigation Measures
HYDR 5: Potential Effects on Groundwater Quality	LS	None required.		
13.0 LAND USE				
LU 1: Impacts on Existing Community and Land Use	LS	None required.		
LU 2: Consistency with Ripon General Plan Land Use Designations and Zoning	LS	None required.		
LU 3: Conflict with Habitat or Natural Community Conservation Plans	NE	None required.		
14.0. NOISE				
Noise 1: Exposure of Noise-Sensitive Land Uses to Existing Noise Sources	PS	NOISE 1.1	Applicants for future residential development projects located within 2,000 feet of SR 99 shall retain a qualified acoustical professional to conduct noise analysis to determine the project site noise levels that would result from traffic on SR 99 as well as existing and planned arterial roadways in the vicinity of the project, and to prescribe noise mitigation measures sufficient to reduce predicted noise levels on the project site to City standards or lower. The applicant shall incorporate noise mitigation features into project plans and specifications.	LS
		NOISE 1.2	The Community Development Director (Director) shall consider the potential noise exposure of proposed residential projects adjacent to or near existing or planned non-residential development. If the Director determines that City noise standards may be exceeded at proposed residences, the Director may specify measures that would reduce potential noise impacts to a less than significant level, or require the applicant to have an acoustical study prepared by a qualified consultant that includes recommendations that prevent exceedance of City standards. Conditions of approval for the project shall incorporate measures specified by the Director or the noise study as appropriate.	
NOISE 2: Permanent Increase in Ambient Noise Levels	LS	None required.		
NOISE 3: Exposure of Noise-Sensitive Land Uses to Railroad Noise	LS	None required.		
NOISE 4: Construction Noise Impacts	LS	None required.		
NOISE 5: Exposure to Aviation Noise from a Public Airport, Public Use Airport or Private Airstrip	NE	None required.		
15.0. POPULATION AND HOUSING				

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures		Significance After Mitigation Measures
POP 1: NPSP Effects on Population Growth	LS	None required.		
POP 2: NPSP Effects on Housing	LS	None required.		
16.0. PUBLIC SERVICES/FACILITIES				
SERV 1: NPSP Impacts on Police Protection Services	LS	None required.		
SERV 2: Impact of NPSP Development on Fire Protection Services	LS	None required.		
SERV 3: NPSP Impacts on Schools	LS	None required.		
SERV 4: NPSP Impacts on Parks and Recreation	LS	None required.		
17.0 TRANSPORTATION				
TRANS 1: NPSP Effects on Surface Street Levels of Service	PS	TRANS 1.1	The City environmental review officer shall consider the potential traffic effects of NPSP projects that would generate 50 or more PM peak hour trips, or other potentially significant traffic impacts and require additional traffic study as needed to address potential traffic impacts. Improvement requirements recommended in the traffic study shall be required of the project.	LS
		TRANS 1.2	In the event that a project would have significant traffic effects not addressed in this EIR, then the City environmental review officer shall require additional environmental review as required by CEQA.	
TRANS 2: NPSP Effect on Freeway Mainline Levels of Service	N/A		None required.	
TRANS 3: NPSP Effects on Vehicle Miles Traveled	LS		None required.	
TRANS 4: Other Potential Transportation Effects	LS		None required.	
18.0. UTILITIES AND ENERGY				
UTIL 1: NPSP Effects on Wastewater System Capacity	LS		None required.	
UTIL 2: Availability of Adequate Domestic Water Supply (SB 610)	LS		None required.	
UTIL 3: NPSP Effects on Potable Water Distribution System	LS		None required.	

TABLE 2-1
SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Potential Impact	Significance Before Mitigation Measures	Mitigation Measures	Significance After Mitigation Measures
UTIL 4: Availability of Storm Drainage Services	LS	None required.	
UTIL 5: Compliance with Storm Water Quality Regulations	LS	None required.	
UTIL 6: NPSP Impacts on Non-Potable Water Systems	LS	None required.	
UTIL 7: Solid Waste Generation	LS	None required.	
UTIL 8: NPSP Effects on Public Utilities	LS	None required.	
UTIL 9: Energy Impacts of Project	LS	None required.	

3.0 COMMENTS ON THE EIR AND THE LEAD AGENCY'S RESPONSES TO COMMENTS

The City of Ripon received a total of seven (7) comment letters, all from agencies, during the public review period for the NPSP DEIR. The comment letters are reproduced later in this section; the agencies that submitted comment letters are listed below.

1. State Clearinghouse
2. Central Valley Regional Water Quality Control Board
3. California Department of Conservation
4. California Department of Transportation (Caltrans)
5. San Joaquin Valley Air Pollution Control District
6. Stanislaus County Environmental Review Committee
7. San Joaquin Council of Governments

Comment letter number 6, from the Stanislaus County Environmental Review Committee, indicated there it had no comments regarding the DEIR. The letter is reproduced but is not followed by responses, as none are necessary.

Comment letter number 7, dated June 11, 2015, was received by the City on June 22, 2015, after the close of the review period on June 15. Nonetheless, the City is including this comment and responses in the Final EIR.

Each of the comment letters are displayed on the following pages in the order listed above; each comment letter is followed by the Lead Agency's responses to the comments. Each comment letter is assigned a number ("1, 2, 3 ...") code, as listed above, and each substantive comment within each comment letter is assigned a letter ("A, B, C ...") code. Thus, each comment has a unique code made up of the letter number and the comment letter code ("2A, 2B, 4A, etc."). For example, comment "2A" is the first comment made by the Central Valley Regional Water Quality Control Board.

The Lead Agency's responses to each commenter are shown following each comment letter. The Lead Agency's responses are keyed to the respective unique comment code.

THIS LETTER HAS NOT YET BEEN RECEIVED FROM THE STATE CLEARINGHOUSE.
IT WILL BE INCLUDED IN THE FINAL EIR UPON RECEIPT.

THIS LETTER HAS NOT YET BEEN RECEIVED FROM THE STATE CLEARINGHOUSE.
IT WILL BE INCLUDED IN THE FINAL EIR UPON RECEIPT.

Lead Agency Responses to Comment Letter #1, State Clearing House, June 2015

Response 1A: This comment advises the City of Ripon of the close of the public review period for state agencies, identifies the state agencies involved in the review and transmits comment letters collected by the State Clearinghouse from state agencies. The letter advises the City of Ripon that CEQA public review requirements have been met and that the CEQA review process is complete on the state level. The letter makes no substantive comment on the EIR, and no further response is required.



Central Valley Regional Water Quality Control Board

21 May 2015

Ken Zuidervaart
City of Ripon
259 Wilma Avenue
Ripon, CA 95366

CERTIFIED MAIL
7014 2870 0000 7535 3152

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, NORTH POINTE SPECIFIC PLAN PROJECT, SCH# 2015052005, SAN JOAQUIN COUNTY

Pursuant to the State Clearinghouse's 1 May 2015 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the North Pointe Specific Plan Project, located in San Joaquin County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

2A

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

RECYCLED PAPER

COMMENT NO. 2
CENTRAL VALLEY REGIONAL WATER
QUALITY CONTROL BOARD

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

2B

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

2C

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

2D

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

COMMENT NO. 2
CENTRAL VALLEY REGIONAL WATER
QUALITY CONTROL BOARD

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACOE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

2E

Waste Discharge Requirements

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

2F

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml.

Regulatory Compliance for Commercially Irrigated Agriculture

If the property will be used for commercial irrigated agricultural, the discharger will be required to obtain regulatory coverage under the Irrigated Lands Regulatory Program. There are two options to comply:

1. **Obtain Coverage Under a Coalition Group.** Join the local Coalition Group that supports land owners with the implementation of the Irrigated Lands Regulatory Program. The Coalition Group conducts water quality monitoring and reporting to the Central Valley Water Board on behalf of its growers. The Coalition Groups charge an annual membership fee, which varies by Coalition Group. To find the Coalition Group in your area, visit the Central Valley Water Board's website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/app_approval/index.shtml; or contact water board staff at (916) 464-4611 or via email at IrrLands@waterboards.ca.gov.
2. **Obtain Coverage Under the General Waste Discharge Requirements for Individual Growers, General Order R5-2013-0100.** Dischargers not participating in a third-party group (Coalition) are regulated individually. Depending on the specific site conditions, growers may be required to monitor runoff from their property, install monitoring wells, and submit a notice of intent, farm plan, and other action plans regarding their actions to comply with their General Order. Yearly costs would include State administrative fees (for example, annual fees for farm sizes from 10-100 acres are currently \$1,084 + \$6.70/Acre); the cost to prepare annual monitoring reports; and water quality monitoring costs. To enroll as an Individual Discharger under the Irrigated Lands Regulatory

2G

COMMENT NO. 2
CENTRAL VALLEY REGIONAL WATER
QUALITY CONTROL BOARD

Program, call the Central Valley Water Board phone line at (916) 464-4611 or e-mail board staff at IrrLands@waterboards.ca.gov.

2G

Low or Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters (Low Threat General Order)* or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water (Limited Threat General Order)*. A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

2H

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf

If you have questions regarding these comments, please contact me at (916) 464-4684 or tcleak@waterboards.ca.gov.



Trevor Cleak
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research, Sacramento

COMMENT NO. 2
CENTRAL VALLEY REGIONAL WATER
QUALITY CONTROL BOARD

Lead Agency Responses to Comment Letter #2, Central Valley Regional Water Quality Control Board, May 21, 2015

Response 2A: This comment describes State regulatory related to construction storm water quality but makes no comment on the DEIR; no response is necessary. The DEIR acknowledged these requirements in Chapter 12.0 Hydrology and Water Quality, including a description of the City's adopted Storm Water Management Plan and proposed updates of the Plan, which incorporate construction water quality requirements.

Response 2B: This comment briefly describes the State's Phase I and II MS4 permits for control of runoff and water pollution from new development. There is no comment on the DEIR, and no response is necessary. The DEIR acknowledged MS4 requirements in Chapter 12.0 Hydrology and Water Quality; compliance with the MS4 program is also addressed in the City's Storm Water Management Plan and updates.

Response 2C: This comment describes the State's Industrial Storm Water General Permit Order as related to storm water discharges from industrial sites but makes no comment on the DEIR; no response is necessary. Industrial storm water requirements are addressed in the City's Storm Water Management Plan and proposed updates. The NPSP does not provide for future industrial development.

Response 2D: The comment describes the requirements of Clean Water Act related to navigable waters and wetlands, administered by the U.S. Army Corps of Engineers. Again, the comment does not address the DEIR, and no response is necessary. The DEIR Chapter 7.0 Biological Resources and 12.0 Hydrology and Water Quality indicate there are no navigable waters or wetlands located within the NPSP area that would involve a 404 permit.

Response 2E: The comment addresses Clean Water Act Section 401 permits and water quality certification, which apply if a project involves work in waters of the United States; the program is administered by the State. This comment does not address the DEIR, and no response is necessary. As documented in the EIR chapters referenced in Response 2D, there are no waters or wetlands within the NPSP area that might trigger Section 401 requirements.

Response 2F: The comment describes State Waste Discharge Requirements (WDR) that may be required when there are discharges to non-federal jurisdictional waters of the State, including certain wetlands. There are no waters or wetlands located within the NPSP area. In any event, this comment does not address the DEIR, and no response is necessary.

Response 2G: This comment addresses water quality permit requirements for irrigated agricultural lands. Although irrigated agricultural lands exist within the NPSP area, agricultural irrigation is not a subject of the NPSP, and its adoption will not result in any change in existing agricultural operations. This comment does not address any aspect of the DEIR, and no response is necessary.

Response 2H: This comment addresses State water quality permit requirements related to discharges of dewatering wastewater. These requirements apply to construction pursuant to the NPSP but do not apply to adoption of the Plan itself. This comment does not address any aspect of the DEIR, and no response is necessary.



DEPARTMENT OF CONSERVATION

DIVISION OF LAND RESOURCE PROTECTION

801 K STREET • MS 18-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 324-0850 • FAX 916 / 327-3430 • TDD 916 / 324-2555 • WEB SITE conservation.ca.gov

June 8, 2015

VIA EMAIL: KZUIDERVAART@CITYOFRIPON.ORG

Mr. Ken Zuidervaart, Community Development Director
City of Ripon
259 N Wilma Avenue
Ripon, CA 95366

Dear Mr. Zuidervaart:

**NORTH POINTE SPECIFIC PLAN DRAFT ENVIRONMENTAL IMPACT
REPORT - SCH# 2015052005**

The Department of Conservation's (Department) Division of Land Resource Protection (Division) has reviewed the Draft Environmental Impact Report (DEIR) submitted by The City of Ripon. The Division monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. We offer the following comments and recommendations with respect to the proposed project's potential impacts on agricultural land and resources.

Project Description

The City of Ripon is proposing the North Pointe Specific Plan (NPSP) on 310 acres located north of State Route (SR) 99, east of Jack Tone Road and west of Fulton Avenue. It currently includes Mistlin Sports Park in the north and highway services, lodging, retail commercial and food service businesses in the vicinity of the Jack Tone Road/SR 99 freeway interchange. The NPSP would promote and guide the development of new urban commercial and residential land uses by involving a mix of neighborhood and region-serving commercial, technology, office, recreation, entertainment and residential uses. Total development of the specific plan would include 1,050 new single and multi-family residential units and a projected 1.7 million square feet of commercial/non-residential development.

Approximately half of the NPSP area has already undergone urban development. The remaining land, primarily in the central portion of the NPSP area, is in agricultural uses (almond orchards, agricultural product processing, and fallow land). There are no lands within the NPSP area that are under Williamson Act contracts.

3A

COMMENT NO. 3
CALIFORNIA DEPARTMENT OF CONSERVATION

Agricultural Impacts

The DEIR states that undeveloped portions of the NPSP area are classified as three acres of Prime Farmland, 103 acres of Farmland of Statewide Importance, and 47 acres of Farmland of Local Importance. Agricultural land conversion would be an irreversible loss of approximately 175 acres of land that is suitable for a variety of agricultural uses¹.

3A

Department Comments

The City of Ripon has determined that agricultural resources and the loss of agricultural land was addressed in the Ripon 2040 General Plan and General Plan Environmental Impact Report (GPEIR) as well as in prior General Plans and CEQA documents. A Statement of Overriding Considerations for loss of agricultural land was adopted by the Ripon City Council in conjunction with adoption of the General Plan and was certified on September 19, 2006.

City approval of the NPSP would require an amendment of the Ripon General Plan and zoning ordinance to reflect specific plan designations. The General Plan currently designates the NPSP area for urban development, primarily urban Mixed Use and Highway Commercial development, which was considered in the previous EIR. The City of Ripon has stated that they are tiering this DEIR with respect to the City's 2040 General Plan. According to Public Resources Code § 21094(a)(2)(D):

If a prior environmental impact report has been prepared and certified for a program, plan, policy, or ordinance, and the lead agency makes a finding of overriding consideration pursuant to subdivision (b) of Section 21081, the lead agency for a later project that uses a tiered environmental impact report from that program, plan, policy, or ordinance may incorporate by reference that finding of overriding consideration if all of the following conditions are met: ...

(D) The prior environmental impact report was certified not more than three years before the date findings are made pursuant to Section 21081 for the later project.

3B

Therefore, the findings of overriding consideration from the 2040 General Plan cannot be used with the North Pointe Specific Plan, because they are out of date in accordance with Pub. Res. Code § 21094(a)(2)(D). The City is required to address whether or not this project may cause significant effects on agricultural resources. The Department suggests that the City of Ripon revisit its mitigation efforts for the loss of agricultural land with respect to the North Point Specific Plan.

¹ City of Ripon Community Development Department. *North Pointe Specific Plan EIR*. May 1, 2015.
Prepared by: Basecamp Environmental. Section 5.0 Agriculture and Forestry, page 1 and 3.

Mitigation Measures

CEQA is the state's main policy tool for agricultural land preservation. If a project is deemed significant, lead agencies are required to adopt feasible mitigation measures to avoid or substantially lessen them. The conversion of agricultural land represents a permanent reduction in the State's agricultural land resources. As such, the Department advises the use of permanent agricultural conservation easements on land of at least equal quality and size as partial compensation for the direct loss of agricultural land. Conservation easements are an available mitigation tool and considered a standard practice in many areas of the State.

Conservation easements will protect a portion of those remaining land resources and lessen project impacts in accordance with CEQA Guideline §15370. The Department highlights this measure because of its acceptance and use by lead agencies as an appropriate mitigation measure under CEQA and because it follows an established rationale similar to that of wildlife habitat mitigation.

Although direct conversion of agricultural land is often an unavoidable impact under CEQA analysis, mitigation measures must be considered. In some cases, the argument is made that mitigation cannot reduce impacts to below the level of significance because agricultural land will still be converted by the project, and, therefore, mitigation is not required. However, reduction to a level below significance is not a criterion for mitigation under CEQA. Rather, the criterion is feasible mitigation that lessens a project's impacts. A Statement of Overriding Considerations is not a substitute for the requirement to prepare findings (CEQA Guidelines §15091)². CEQA states that the Lead Agency shall describe the specific reasons for rejecting identified mitigation measures. Therefore, all mitigation measures that are potentially feasible should be included in the DEIR. A measure brought to the attention of the Lead Agency should not be left out unless it is infeasible based on its elements. Because agricultural conservation easements are an available mitigation tool they should always be considered.

3B

Mitigation via agricultural conservation easements can be implemented by at least two alternative approaches: the outright purchase of easements or the donation of mitigation fees to a local, regional, or statewide organization or agency whose purpose includes the acquisition and stewardship of agricultural conservation easements. The conversion of agricultural land should be deemed an impact of at least regional significance. Hence, the search for replacement lands should not be limited strictly to lands within the project's surrounding area.

One source that has proven helpful for regional and statewide agricultural mitigation banks is the California Council of Land Trusts, which can be found at:

² 2015 CEQA Statute and Guidelines. Palm Desert: Association of Environmental Professionals, 2015. 158-159. Print.

<http://www.calandtrusts.org>

The California Council of Land Trusts deals with all types of mitigation banks. It is suggested that the County contact them to get an understanding of the fees associated with mitigation banking and the options available.

Another source is the Division's California Farmland Conservancy Program (CFCP), which has participated in bringing about conservation easements throughout the State of California involving many California land trusts. Of course, the use of conservation easements is only one form of mitigation that should be considered. Any other feasible mitigation measures should also be considered.

Thank you for giving us the opportunity to comment on the DEIR for the North Pointe Specific Plan. Please provide this Department with notices of any future hearing dates as well as any staff reports pertaining to this project. If you have any questions regarding our comments, please contact Farl Grundy, Environmental Planner at (916) 324-7347 or via email at Farl.Grundy@conservation.ca.gov.

Sincerely,



Molly A. Penberth, Manager
Division of Land Resource Protection
Conservation Support Unit

cc: State Clearinghouse

3D

3E

COMMENT NO. 3

CALIFORNIA DEPARTMENT OF CONSERVATION

Lead Agency Responses to Comment #3, California Department of Conservation,
June 8, 2015

Response 3A: This section of the comment letter provides the Department of Conservation's (the "Department") understanding of the project and does not require a response.

The Department's comments seem to be offered from the perspective that the NPSP is a new development, which will directly result in the conversion of agricultural land and which should be subject to all feasible mitigation. However, the NPSP is not a new development project or a general plan amendment or a specific plan for a presently undeveloped area outside the City limits, which could have previously-unaddressed impacts and that would require project-level mitigation. Rather, the NPSP contains a refocused land use plan and set of policies for the NPSP area that supplements the existing Ripon General Plan 2040. While the NPSP has an important place in shaping future development of the NPSP area, it will not permit the conversion of any additional agricultural land other than is presently permitted in the area, and would not increase the intensity of development of lands within the NPSP. Instead the NPSP will reduce the amount of allowable development and steer future development oriented to maximizing the use of non-vehicular transportation.

The NPSP area has been annexed into the City and is presently designated and zoned for intensive non-residential urban development. The City has already permitted development of over a third of the area. Existing general plan designations and zoning would permit a total of approximately 2.6 million square feet (SF) of non-residential development. The NPSP would substantially reduce the permitted intensity of development in the area. Most importantly, the NPSP would not encourage or promote the premature conversion of adjacent agricultural land to non-agricultural uses.

Response 3B: The Department's comments revolve around two principal points: 1) that the City is not entitled to utilize the Statement of Overriding Considerations (SOC) adopted when the Ripon General Plan 2040 was approved in 2006, and 2) that the City should revisit its mitigation efforts for the loss of agricultural land.

The City cited the 2006 SOC in its analysis of the potential agricultural land conversion impacts of the project. However, the City made no attempt to avoid disclosure of the potential agricultural land conversion impacts that could result from future development governed by the NPSP. Chapter 5.0 of the DEIR detailed the location, amount, farmland classification and importance in accordance with the Department's classification system, irrigation water availability and economic value of agricultural lands located within the NPSP area. The DEIR described the agricultural land conversion losses that would be associated with development over the 20+-year life of the NPSP. The DEIR also stated that these lands have been committed to urban development for at least 10 years, if not longer.

While the City did consider the fact that an SOC had previously been adopted, the City did not rely exclusively on the SOC but cited several other relevant facts, including:

Agricultural land conversion was previously considered on a cumulative basis in a prior EIR.

City policy is to conserve agricultural lands until they are needed for urban development.

That the NPSP is located within Ripon's designated Primary Urban Area, which provides near-term land area to accommodate urban development, while other lands are conserved until needed for development

The NPSP area has been annexed and zoned for urban development and that vacant lands in the NPSP area are already entitled for development subject to City development plan review.

The City Council will consider adopting a Statement of Overriding Considerations for agricultural land conversion in connection with the NPSP project, consistent with the CEQA Guidelines.

The City of Ripon agrees that it would be insufficient to rely solely on the 2006 SOC, and, if necessary, the City will adopt a new SOC with respect to the NPSP project. Although not specifically described in the NPSP DEIR, the City has previously considered and acted on the Department's recommended mitigation options: that is, establishment of an agricultural mitigation fee for the purpose of acquiring conservation easements. The City's action occurred during its deliberations on the Ripon General Plan 2040 and the general plan EIR; both documents were incorporated into the DEIR by reference in DEIR Chapter 1.0. The City's 2006 SOC took agricultural land mitigation into account.

The City's deliberation occurred in response to comments on the GPEIR by the Department. In a letter dated February 9, 2006, the Department recommended that "the City consider the purchase of agricultural conservation easements on qualifying agricultural lands as mitigation to lessen the impacts of the project." In the same letter, the Department recognized that open space easements acquired under habitat conservation plans such as the San Joaquin County Multi-Species Open Space and Habitat Conservation Plan (SJMSCP) also have value in conserving agricultural land, but agricultural values can be constrained by habitat requirements.

In its Final EIR response to the Departments 2006 comment letter, the City acknowledged that it had no agricultural mitigation program in place and stated:

However, City staff will recommend that the City Council adopt Agricultural Land Mitigation Fund in conjunction with the adoption of the Ripon General Plan Update 2040. Adoption of the fund will involve the imposition of an agricultural impact fee on new development amounting to \$4,500 per acre, to be collected at the time of building permit issuance. The purpose of the fee will be to mitigate the loss of agricultural land resulting from urban development. Among other things, the fees will be used to leverage other funds for the acquisition of land and or the execution of conservation easements. The EIR has been amended to reflect this proposal.

City staff is preparing to develop an agricultural mitigation fee for the City Council's consideration. It is anticipated that staff would work with the development community and LAFCO staff in the development of the fee. Staff has been in discussion with developers of two projects, one large and one small, indicating that there is increasing pressure to adopt agricultural mitigation fees and that the City will look to these and other projects to assist in developing the structure and requirements of the fee. As an agricultural mitigation fee is developed, the City will need to consider the geographic area of applicability as well as the fee structure. Application of the fee to undeveloped agricultural lands within the NPSP area would be considered at that time.

Considering the incorporated status of the NPSP area and the level of development entitlement that currently exists within the NPSP area, the City does not consider it appropriate or feasible to impose agricultural mitigation fees on NPSP development as a part of adoption of the NPSP. There is no adopted fee program available that can be instituted at this time, and development and approval of the fee would require several months.

The City participates in the SJMSCP, which, as the Department recognized in 2006, involves the purchase and management of open space easements acquired for the purpose of habitat conservation and improvement; most of these easements are purchased on agricultural lands and assist in the conservation if not preservation of these lands for agricultural purposes. As noted by the Department, however, agricultural productivity can be constrained by habitat requirements.

DEPARTMENT OF TRANSPORTATION

DISTRICT 10 DIRECTOR

P.O. BOX 2048

1976 E. DR. MARTIN LUTHER KING JR. BLVD.
 STOCKTON, CA 95205
 PHONE (209) 948-7943
 FAX (209) 948-3670
 TTY 711

www.dot.ca.gov



*Serious Drought.
 Serious drought.
 Help save water!*

June 11, 2015

10-SJ-99-PM 001.708-002.257
North Pointe Specific Plan
DEIR
SCH#2015052005

Ken Zuidervaart
 City of Ripon
 Planning Department
 259 N Wilma Avenue
 Ripon, CA 95366

Dear Mr. Zuidervaart:

The California Department of Transportation appreciates the opportunity to have reviewed the Notice of Preparation for the Environmental Impact Report for the North Pointe Specific Plan. The plan area is generally bounded by the Mistlin Sports Park to the north, Fulton Avenue to the east, SR-99 to the south, and Jack Tone Road to the west. The Department's comments are as follows:

- The Traffic Study provided was not prepared in accordance with our previous letter dated December 15, 2014. It does not include the requested intersection analysis, signal timing, and queuing analysis or the Synchro/Simtraffic Version 8.0 files needed for review of this project. Please re-submit a Traffic Impact Study prepared in accordance with the *Caltrans Guide for the Preparation of Traffic Impact Studies*, dated December 2002, and our department's December 15, 2014 letter. The Guide is available online at the following web address: http://www.dot.ca.gov/hq/tp/tp/planning_tools/tools.htm.

If you have any questions or would like to discuss our comments in more detail, please contact Nicholas Fung at (209) 948-7190 or me at (209) 941-1921.

Sincerely,

TOM DUMAS, CHIEF
 OFFICE OF METROPOLITAN PLANNING

4A

*"Provide a safe, sustainable, integrated and efficient transportation system
 to enhance California's economy and livability"*

COMMENT NO. 4
CALTRANS

DEPARTMENT OF TRANSPORTATION

DISTRICT 10 DIRECTOR

P.O. BOX 2048

1976 E. DR. MARTIN LUTHER KING JR. BLVD.

STOCKTON, CA 95205

PHONE (209) 948-7943

FAX (209) 948-3670

TTY 711

www.dot.ca.gov



*Serious drought,
Help save water!*

December 15, 2014

10-SJ-99-PM 001.708-002.257**North Pointe Specific Plan****NOP for EIR**

Ken Zuidervaart
 City of Ripon
 Planning Department
 259 N Wilma Avenue
 Ripon, CA 95366

Dear Mr. Zuidervaart:

The California Department of Transportation appreciates the opportunity to have reviewed the Notice of Preparation for the Environmental Impact Report for the North Pointe Specific Plan. The plan area is generally bounded by the Mistlin Sports Park to the north, Fulton Avenue to the east, SR-99 to the south, and Jack Tone Road to the west. The Department's comments are as follows:

- A Traffic Impact Study (TIS) is necessary to determine this proposed project's near-term and long-term impacts to State facilities – both existing and proposed – and to propose appropriate mitigation measures. The Department recommends that the study be prepared in accordance with the *Caltrans Guide for the Preparation of Traffic Impact Studies*, dated December 2002. The Guide is available online at the following web address: http://www.dot.ca.gov/hq/tpp/planning_tools/tools.htm.
- Submittal of Synchro/Simtraffic version 8.0 Electronic file in a CD and hard copy of the TIS report as well as Synchro/Simtraffic hard copy output files are needed for review of this proposed project.
- At a minimum, the following interchanges and ramp intersections including adjacent frontage roads need to be evaluated:
 - SR-99/Jack Tone Road interchange
 - SR-120/Jack Tone Road intersection
 - SR-99/Austin Rd interchange
 - SR-99/Fulton Ave Arc Way On/Off ramps
 - SR-99/Main Street interchange

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

COMMENT NO. 4
CALTRANS

- At a minimum, the following mainline highway segments will need to be evaluated:
 - SR-99 from Jack Tone Road to Austin Road
 - SR-99 from Austin Road to Jack Tone Road
 - SR-99 from Jack Tone Road to Main Street
 - SR-99 from Main Street to Arc Way
 - SR-99 from Arch Way to Jack Tone Road
- The traffic impact study must include the following traffic study scenarios:
 - Existing conditions (Existing year)
 - Existing Plus Phase 1 Project Conditions (Year completion)
 - Existing Plus Build Project Conditions (Year completion)
 - Cumulative Conditions (Existing Conditions plus Other Approved and Pending Projects)
 - Cumulative Conditions plus complete Build out Project (Year completion)
- For each of the above traffic study scenarios, the traffic impact study must include
 - Traffic Volume
 - A figure to show Intersection Peak Hour Traffic Volume and Lane Configurations
 - A table to show Intersection Control type, AM/PM delay and LOS
 - A table to show intersection Queuing Analysis movements, available storage, and the 95th percentile Queue for AM and PM peak hour.
- To improve bicycle access to the development, the Department recommends that the existing Class 1 bicycle facility on Jack Tone Road be extended north past Santos Avenue and that the existing Class 1 bicycle facility on Fulton Avenue be extended south past SR-99.
- The Department recommends that the lead agency encourage the developer to submit a scope of work for conducting the TIS prior to circulating the DEIR. The Department will provide additional comments upon completion of review.

If you have any questions or would like to discuss our comments in more detail, please contact Nicholas Fung at (209) 948-7190 or me at (209) 941-1921.

Sincerely,



TOM DUMAS, CHIEF
OFFICE OF METROPOLITAN PLANNING

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability."*

COMMENT NO. 4 CALTRANS

Lead Agency Responses to Comment #4, State Department of Transportation, District 10, June 11, 2015

Response 4A: Caltrans comment on the DEIR states that the Traffic Impact Study (TIS) included in the EIR is not in accord with Caltrans recommendations submitted in its December 15, 2014 response to the City's Notice of Preparation (NOP). Both the comment letter and the earlier NOP response are shown on the preceding pages.

Specifically, Caltrans requested that the City analyze traffic impacts following Caltrans' *Guide for the Preparation of Traffic Impact Studies*, including intersection, signal timing and queuing impacts, and more specifically the use of the Synchro/Simtraffic traffic analysis model. The study methods described by Caltrans are more typically used for intersection-level traffic impact analysis.

The City of Ripon received and appreciates both the Caltrans NOP response and the EIR comment letter. However, based on its own understanding of the project, of potential development that could result from the project and its interpretation of CEQA, the City decided to utilize a traffic study methodology different than that recommended by Caltrans. The City determined that, for the purposes of the NPSP, traffic analysis at the intersection level as recommended by Caltrans is not appropriate or feasible for the NPSP project.

The comments suggest that the project is an application to the City of Ripon for approval of a specific development project, not a planning level study. In contrast, an application for development project approval typically includes detailed maps, infrastructure and on-site circulation and improvement plans as well as planned access to the public street system. For the NPSP no such information is available.

The Caltrans comment did not reference or disagree with the City's explanation of its reasoning for its traffic impact analysis methodology:

The NPSP does not include land use prescriptions, site designs or building footprints for any of the properties in the planning area; the NPSP provides no guidance as to access points, on-site circulation, site improvements or other development detail that would be necessary to support a more detailed traffic impact analysis, nor has this information been submitted to the City. The basis does not exist for more precise estimation of trip generation, internal trip capture, trip distribution and assignment. More specific analysis, i.e. of intersections, is not feasible with the available information and would not provide meaningful information for project applicants or City decision-makers. (DEIR page 17-3)

The City believes its approach to traffic analysis for the NPSP is sound and appropriate to the specificity of the project. The foundation for the approach is described in detail on page 17-1 of the DEIR:

The NPSP traffic analysis is programmatic and is not intended to provide blanket "project-level" CEQA coverage for future NPSP development projects. The NPSP includes land use plans, policies and design standards for the NPSP area that are more specific than the guidance provided in the General Plan 2040, but this planning guidance remains general in nature and does not provide the information necessary to support project-level traffic analysis. The NPSP describes a range of land uses that can occur

within each land use designation but is not specific as to the amount of land use, development phasing, site access or site design. This information will become available to the City as individual development applications are submitted for review and approval. This is consistent with the level of definition of the project, and the “degree of specificity” required of an EIR for plan and policy documents established in CEQA Guidelines §15146. The City instead developed its own approach to traffic impact analysis that it believed could be conducted at a level of detail appropriate to the proposed project, was feasible and which would provide meaningful information for use by project decision-makers, including any responsible agencies. The City’s approach involved the use of its adopted traffic model, which is based on the regional transportation agency’s model, to predict the effects of buildout on the streets and highways serving the NPSP area.

The City’s traffic impact analysis is an appropriate equivalent of the more-detailed intersection-level studies suggested in the Caltrans comment letter. Consistent with the Caltrans recommendations, the City’s analysis considered several scenarios that reflect near-term baseline and long-term future baseline conditions, with and without the NPSP project. The near-term baseline assumed existing conditions as represented by 2015 traffic counts for the project area, and the long-term baseline condition was buildout under the Ripon General Plan 2040. The City analyzed baseline and baseline plus project levels of service for street segments. The analysis was conducted using the City’s traffic analysis model, which is based on the model used by the San Joaquin County Council of Governments for regional transportation planning.

The results of the City’s analysis support its decision to forego intersection analysis; the analysis results indicate that the project would have less than significant traffic effects under the analysis scenarios. The NPSP would result in substantially reduced potential development; consequently trip generation from future development within the planning area and projected traffic would be reduced and could be accommodated by the existing and future projected street systems. The NPSP would also result in a reduction in projected vehicles miles traveled, as well as greenhouse gas emissions, which is consistent with the objectives of the project to increase pedestrian, bicycle and active transportation usage within the community. On the freeway system, the modeling indicates that the project would result in reductions in projected traffic on the three freeway segments southeast of Jack Tone Road and only minor, less than significant increases on the segment to the northwest.

The EIR acknowledges that future development within the NPSP would contribute to SR 99 mainline and interchange traffic and to the demand for and cost of future improvements to State facilities. However, no specific improvement needs have been identified, in particular at the SR 99/Jack Tone Road interchange. The NPSP would result in a general reduction in future demand on these facilities, and the City is already collecting funds for the projected costs of necessary freeway mainline and interchange improvements through the San Joaquin County Regional Transportation Improvement Fee program. In addition, the City is collecting special NPSP fees that will include funding for improvements to the Fulton Avenue overcrossing of SR 99. These and other projects with direct effects on the State Highway System will need to conform with Caltrans design and environmental review requirements. There are no such highway improvement or other approval requirements associated with the NPSP; as a result, Caltrans will not be obligated to use the EIR as a Responsible Agency.

The EIR does not purport to provide traffic analysis coverage to future projects that will occur in the NPSP area. Rather, the EIR explicitly states (page 17-1) that the potential traffic effects of individual projects, and any resulting need for additional CEQA review, will need to be considered by the City on a case-by-case basis.

In its NOP response letter, Caltrans recommends that the City construct two bike lane segments. Both of these are a part of the Ripon Bikeway Master Plan and, as has been the City's practice in the past, will be constructed in conjunction with urban development in North Ripon.



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



Ken Zuidervaart
City of Ripon
Community Development
259 N Wilma Avenue
Ripon, CA 95366

Project: Draft Environmental Impact Report for the North Pointe Specific Plan

District CEQA Reference No: 20150391

Dear Mr. Zuidervaart:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Draft Environmental Impact Report (Draft EIR) for the North Pointe Specific Plan. Per the Draft EIR, the proposed project consists of future development of 1,050 medium and high density residential units and 1.7 million square feet of non-residential use (Project). The Project will be located between Jack Tone Road and Fulton Avenue in Ripon, California. The District offers the following comments:

1. Voluntary Emissions Reduction Agreement (VERA)

The District recommends that the City of Ripon assess the feasibility of implementing a VERA as a feasible mitigation measure, between the project proponent and the District, to lessen the significant impacts of this project on air quality.

CEQA requires that all feasible mitigation measures be implemented, as stated in Public Resources Code § 21002 below:

The Legislature finds and declares that it is the policy of the state 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...

With the District's highly lauded incentive program identifying and funding emission reduction projects on behalf of the project proponent, VERAs have proven to be a feasible and highly effective measure to mitigate project impacts on air quality. Over the past 9 years, 22 VERA's have been entered into resulting in emissions

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-8400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

5A

COMMENT NO. 5
SAN JOAQUIN VALLEY AIR
POLLUTION CONTROL DISTRICT

reductions of approximately 1,877 tons and effectively contributing in the overall air quality improvement in the Valley. Therefore, unless the County of Merced can demonstrate that a VERA is not a feasible mitigation measure for this project, Mitigation Measure AQ-3B should be revised to require that a VERA be entered into between the project proponent and the District to substantially lessen the significant impacts of this project on air quality.

For informational purpose, a VERA is a mitigation measure by which the project proponent provides funds to the District used to mitigate pound-for-pound project related air emissions increases. With the District's highly lauded incentive program identifying and funding emission reduction projects on behalf of the project proponent, VERAs have proven to be a feasible and highly effective measure to mitigate project impacts on air quality.

VERAs provide a mechanism under which project proponents enter into a contractual agreement with the District to mitigate their project's impact on air quality. Once entered into, VERAs become legally enforceable mechanisms for achieving air quality mitigation.

Dollars provided by the project proponent are reinvested in the San Joaquin Valley to reduce emissions. Utilizing the District's highly successful grant administration program, the funds generated here will be awarded to Valley businesses, residents, and municipalities to generate real and quantifiable reductions in emissions. The following are some examples of how these funds will be utilized to reduce air pollution:

- Grants to farmers to purchase new irrigation pump engines or motors.
- Grants to farmers to purchase new tractors.
- Grants to truckers to purchase new trucks, or retrofit existing trucks.
- Public Benefit Grants to reduce emissions from mobile sources.
- Grants to Valley residents to purchase cleaner vehicles.
- Grants to Valley residents through the District's Tune-In Tune-Up program to repair older high-polluting vehicles.
- Grants to replace older and high-polluting school buses.

The emissions reductions secured through VERAs are "surplus" to existing regulations, achieving reductions earlier or beyond those required by regulations. Additionally, funding is provided prior to generation of project emissions, and there is no refund of funding that has been spent if projects are cancelled or downsized.

Over the years, the District has built a reputation for excellence in the implementation of these programs, as highlighted by recent audits by state agencies

5A

COMMENT NO. 5

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

that lauded the District's incentive programs including VERAs for their efficiency and effectiveness. The District's incentive programs have invested over \$1 billion in public and private funding for clean air projects reducing more than 100,000 tons of emissions.

VERAs also provide a mechanism for accurate quantification of actual air emissions associated with the project. Under VERAs, the District is granted the final authority to quantify emissions generated by the project. VERAs require that project proponents mitigate emissions quantified by the District providing for complete accountability and reporting to the public.

District staff is available to meet with lead agencies and project proponents to discuss VERAs for specific projects. For more information, or questions concerning this topic, please call District CEQA/ISR staff at (559) 230-6000.

2. Health Risk Assessment

Based on the information provided, the Health Risk Assessment (HRA) should be revised to provide a more refined estimate of health risk impacts due to implementation of the Project.

- a) The District recommends the HRA be revised to include the assessment of health risk to new and existing residents and workers from new sources of toxic air contaminants (TACs) that are part of the Project. This can be addressed by explicitly modeling a "worst-case" scenario or by inclusion of a mitigation measure that requires a new HRA to be performed before new sources of TACs are constructed.
- b) The current HRA included Diesel Particulate Matter (DPM) emission factors for year 2030. It's important to note, very large reductions in DPM emission factors are projected between now and 2025. As such, the District's modeling guidance requires use of a reasonable "worst-case" scenario and therefore recommends the HRA include DPM emission factors for the year in which construction of new residential units begins.
- c) The Draft EIR includes an HRA that was performed on March 2015, which did not include the most recent version of AERMOD. The District recommends using the most current version of AERMOD (version 14134) which includes the most recent meteorological data and will result in a more refined assessment.
- d) The District recommends the Draft EIR include a specific risk estimate for the proposed new residential units and existing sensitive receptors. Should risk

5A

5B

COMMENT NO. 5
SAN JOAQUIN VALLEY AIR
POLLUTION CONTROL DISTRICT

be considered significant, the District recommends a discussion be included in the Draft EIR and all feasible mitigation measures should be incorporated to reduce potential risk.

5B

3. District Rules and Regulations

If approval of an individual development project constitutes the last discretionary approval by your agency, the District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees, be made a condition of project approval.

District Rule 9510 is intended to mitigate a project's impact on air quality through project design elements or by payment of applicable off-site mitigation fees. Individual development projects would be subject to District Rule 9510 (Indirect Source Review) if upon full build-out the project would equal or exceed one of the following thresholds:

- 50 dwelling units
- 2,000 square feet of commercial space;
- 25,000 square feet of light industrial space;
- 100,000 square feet of heavy industrial space;
- 20,000 square feet of medical office space;
- 39,000 square feet of general office space; or
- 9,000 square feet of educational space; or
- 10,000 square feet of government space; or
- 20,000 square feet of recreational space; or
- 9,000 square feet of space not identified above

5C

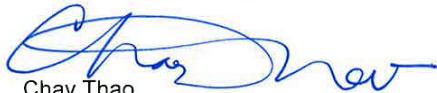
Any applicant subject to District Rule 9510 is required to submit an Air Impact Assessment (AIA) application to the District no later than applying for final discretionary approval, and to pay any applicable off-site mitigation fees. If approval of the subject project constitutes the last discretionary approval by your agency, the District recommends that demonstration of compliance with District Rule 9510, including payment of all applicable fees, be made a condition of project approval. Information about how to comply with District Rule 9510 can be found online at <http://www.valleyair.org/ISR/ISRHome.htm>.

The District appreciates the opportunity to comment on the Draft EIR for the North Pointe Specific Plan. If you have any questions or require further information, please contact Eric McLaughlin at (559) 230-5808.

COMMENT NO. 5
SAN JOAQUIN VALLEY AIR
POLLUTION CONTROL DISTRICT

Sincerely,

Arnaud Marjollet
Director of Permit Services



Chay Thao
Program Manager

AM: em

COMMENT NO. 5
SAN JOAQUIN VALLEY AIR
POLLUTION CONTROL DISTRICT

Lead Agency Responses to Comment #5, San Joaquin Valley Air Pollution Control District, Undated (received June 2015)

Response 5A: The City appreciates the SJVAPCD's (District's) review of the NPSP EIR and has considered its recommendation that the City consider the use of a Voluntary Emissions Reduction Agreement (VERA) to further mitigate the potential air quality effects of anticipated land development within the NPSP area. The City does not believe that the VERA is an appropriate mitigation tool to address the potential air quality impacts of the NPSP; however, the City will consider the use of VERAs in conjunction with future development projects in the NPSP.

As described in the DEIR, anticipated NPSP development over the 20+-year life of the Plan would result in criteria pollutant emissions that cumulatively exceed District significance thresholds. As discussed in the EIR, NPSP planning and design elements would substantially reduce potential air quality impacts by reducing vehicle trips and promoting use of "active transportation" modes. The DEIR also notes that all development within the NPSP is subject to the District's Indirect Source Rule 9510, which would result in additional and substantial reductions in criteria pollutant emissions from anticipated development. In the past, the District has stated that compliance with Rule 9510 is sufficient to reduce potential air quality impacts to a less than significant level, and therefore no additional mitigation would be required.

The VERA program is a mechanism for additional mitigation of potential air quality impacts. A VERA is used to bind a project applicant to specific mitigation contributions or payment of in-lieu fees that are used by the District to fund replacement or retrofit of outdated polluting vehicles and equipment, thereby producing further quantifiable emission reductions. A VERA could be an appropriate mitigation tool for future development projects but is not a necessary or feasible mitigation measure for the NPSP. Nonetheless, the City will consider the use of VERAs in conjunction with CEQA review and approval of subsequent development projects.

Response 5B: The District recommends revision of the HRA included in the EIR to reflect a worst-case scenario, or alternatively to include a mitigation measure requiring performance of a new HRA before new TAC sources are constructed. The City has already modeled a credible and conservative worst-case scenario and explained its methodology in the DEIR. The HRA considered all major sources of TACs; the NPSP does not provide for or promote the development of any substantial new TAC sources. The City's HRA is included in the DEIR appendices.

Any forecast of future public health risks must be based on the most realistic and credible growth scenario; a "worst-case" scenario that is not consistent with these standards would be of little value unless it accurately depicts what is likely to occur in the future.

The main source of TACs affecting the North Pointe Specific Plan is SR 99. The sheer amount of diesel particulate matter (DPM), an important TAC, generated along SR 99 in the immediate project vicinity is 50 to 100 times greater than any new source of TAC that could be developed under the NPSP. Consequently, even if additional TAC sources were developed, the HRA predictions would not be substantially modified.

There is no information to support identification of additional potential TAC sources in the NPSP, nor is there reason to expect that major TAC sources would be located in the NPSP area. The NPSP is oriented primarily to establishment of a pedestrian and bicycle-friendly residential and commercial development. Although further highway-serving commercial uses or other TAC

generators could be accommodated in the vicinity of the SR 99/Jack Tone Road interchange, these uses are not promoted by the NPSP and are today permitted under the City's existing zoning for the area. Including any such future sources of TACs in the HRA would be considered "speculative" under CEQA and in any event would not change the overall conclusions of the HRA.

The HRA included in the DEIR analyzes potential TAC exposure at future residential sites; no additional receptor points need to be analyzed. The HRA analyzed almost 900 individual locations within the NPSP, which covers all possible future locations of new residences. Risk at any sensitive receptor within this region is adequately characterized in the HRA. The health risk at any possible sensitive receptor would not exceed the values depicted in the HRA figures and tables.

The HRA used very conservative assumptions in assessing the potential for health risk in the NPSP area. Specifically, the HRA used the best available forecast of future DPM emission factors for the year 2030 and held these factors constant for the modeled 70-year exposure period. In reality, the emission rates for DPM will continue to decline beyond 2030. The HRA conservatively assumed no such decline.

The District suggested that the HRA use emission factors for the year when construction begins. This would not be a credible modeling assumption. It would be erroneous to assume that emission rates in 2016 or 2017 would remain constant for 70 years from the date construction begins, when the State has published emission rate predictions that show significant drop-offs in DPM emissions over time. Such a scenario is not credibly "worst-case;" it would grossly overstate emission rates, future emissions and public health risks. As noted, if an HRA is to have any value, it must accurately forecast what is likely to occur in the future.

The District also suggests that using the current version of the model would somehow be preferable to the model version used in the HRA. The main changes to the AERMOD model since Version 12060, which was used in the HRA, are limited to correction of "bugs" and several changes affecting ozone modeling. None of these changes would affect the TAC modeling results presented in the HRA. If necessary, however, the City can provide the District with AERMOD results using the current Version 14134.

Response 5C: The DEIR documented the District's Rule 9510 and its applicability to new development within the NPSP. New development will be subject to the rule, which would require mitigation measures and/or payment of in-lieu fees, which would be used to substantially reduce the air emissions associated with development. Approval of the NPSP is not, however, the last discretionary approval of development of the area; the District's suggestion that Rule 9510 might apply specifically to the NPSP is therefore not applicable.



CHIEF EXECUTIVE OFFICE

*Stan Risen
Chief Executive Officer*

*Patricia Hill Thomas
Chief Operations Officer/
Assistant Executive Officer*

*Keith D. Boggs
Assistant Executive Officer*

*Jody Hayes
Assistant Executive Officer*

*1010 10th Street, Suite 6800, Modesto, CA 95354
Post Office Box 3404, Modesto, CA 95353-3404*

Phone: 209.525.6333 Fax 209.544.6226

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

May 29, 2015

Ken Zuidervaart
Community Development Director
City of Ripon
259 N. Wilma Avenue
Ripon, CA 95366

**SUBJECT: ENVIRONMENTAL REFERRAL – CITY OF RIPON – NORTH POINTE
SPECIFIC PLAN (NPSP) – NOTICE OF AVAILABILITY OF DRAFT
ENVIRONMENTAL IMPACT REPORT (DEIR)**

Mr. Zuidervaart:

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.

Sincerely,

Patrick Cavanah
Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

STRIVING TO BE THE BEST COUNTY IN AMERICA

**COMMENT NO. 6
STANISLAUS COUNTY
ENVIRONMENTAL REVIEW COMMITTEE**



SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438 (fax)

www.sjcog.org

Steve Dresser June 11, 2015
CHAIR

Anthony Silva Mr. Ken Zuidervaart
VICE CHAIR

Andrew T Chesley Director of Planning and Economic Development
EXECUTIVE DIRECTOR

Member Agencies City of Ripon, Planning Department
CITIES OF

ESCALON,

LATHROP,

LODI,

MANTECA,

RIPON,

STOCKTON,

TRACY,

AND

THE COUNTY OF

SAN JOAQUIN

Re: Notice of Availability – North Point Specific Plan Draft EIR

Dear Mr. Zuidervaart:

Thank you for the opportunity to comment on the Draft EIR and Draft Specific Plan for the North Pointe Specific Plan (NPSP) project. As the County's designated Regional Transportation Planning Agency (RTPA), the Congestion Management Agency (CMA), and the Metropolitan Planning Organization (MPO), the San Joaquin Council of Governments (SJCOC) has reviewed the above-referenced documents and has the following comments:

Draft Specific Plan Comments

Page 82 of the Draft Specific plan states that "*Amtrak operates passenger train service through Ripon (Figure 4-4) along the Union Pacific Railroad tracks, with the nearest stops located in Stockton to the north and Modesto to the south.*"

SJCOC recommends correcting this statement to: "*Amtrak operates passenger train service east of Ripon through Escalon along the BNSF Railroad tracks, with the nearest stops located in Stockton to the north and Modesto to the south.*" This statement should also be corrected on page 149 of the DEIR.

Page 92 of the Draft Specific Plan states that the Park-and-Ride lot at SR-99/Jack Tone Road Interchange is being funded through the Congestion Mitigation and Air Quality Improvement Program. SJCOC recommends the City note that this project is also receiving funding from the Measure K program.

7A

Draft EIR Comments

SJCOG notes that our comment letter on the Notice of Preparation sent on October 29, 2014 to Ken Zuidervaart was omitted from the DEIR. A copy of that letter is attached as Attachment A to this letter.

7B

The DEIR fails to address the requirements and standards of the Regional Congestion Management Program (RCMP), which includes the Regional Travel Demand Management Action Plan. As noted in our letter sent on October 29, a proposed development will have a significant impact to the RCMP network if any one of the following criteria is met during the AM or PM peak hours:

1. For any RCMP roadway or intersection currently operating or expected to operate at LOS D or better under No Project conditions, the project-added traffic results in LOS E or F operating conditions
2. For RCMP intersections or roadways currently operating or expected to operate at LOS E or F under No Project conditions, the project results in increases to:
 - average delay by 4 seconds or more; or,
 - the volume-to-capacity (v/c) ratio by 1.0 or more

7C

A map of the RCMP segments, intersections, and multi-modal level of service (MMLOS) corridors in the specific plan area is included as Attachment B to this letter. SJCOG has examined the traffic analysis conducted by KD Anderson & Associates for the specific plan and concurs that there is no significant impact to the RCMP facilities of River Road or Jack Tone Road under Cumulative Plus Project conditions. However, as stated in the EIR, the traffic analysis does not examine intersection level of service, nor does it examine the level of service or multi-modal level of service of W. Ripon Road/Main Street. SJCOG recently completed its biennial technical monitoring of the RCMP network, which included traffic counts collected in 2013 at the RCMP intersections. SJCOG recommends the City include the intersection LOS and multi-modal level of service data contained in this document in the Final EIR, which is available for review online at www.sjcoeg-rcmp.org/.

The NPSP should be conditioned to ensure that, as development plans are processed, they include provisions to promote participation in San Joaquin COG's Commute Connection program (www.commuteconnection.com). Commute Connection is the regional rideshare program operated by the San Joaquin Council of Governments whose mission is to reduce traffic congestion and improve air quality. The program is designed to help commuters make the transition from driving alone to a convenient ridesharing option such as carpooling, vanpooling, bicycling/walking or riding

7D

transit. The free program includes services such as commuter ride-matching, Guaranteed Ride Home and Employer Services and serves San Joaquin, Stanislaus, and Merced Counties

The following development types require coordination with Commute Connection services/programs:

- All business or industrial parks
- All event centers or stadiums
- Schools with greater than 150 students
- All commercial, industrial, and retail offices with greater than 100 full-time equivalent employees

As a means of mitigating any potential significant effect regarding a conflict with adopted policies, plans, or programs supporting alternative transportation SJCOG requests that mitigation measures be added that will ensure that future development per the NPSP will include provisions for alternative travel and that the land uses listed above will participate in SJCOG's Commute Connection Program.

Thank you again for the opportunity to comment. If you have any questions pertaining to the RCMP program please call Kim Anderson at (209) 235-0565. SJCOG staff would be pleased to meet with the City to provide any necessary information, support and guidance, if needed.

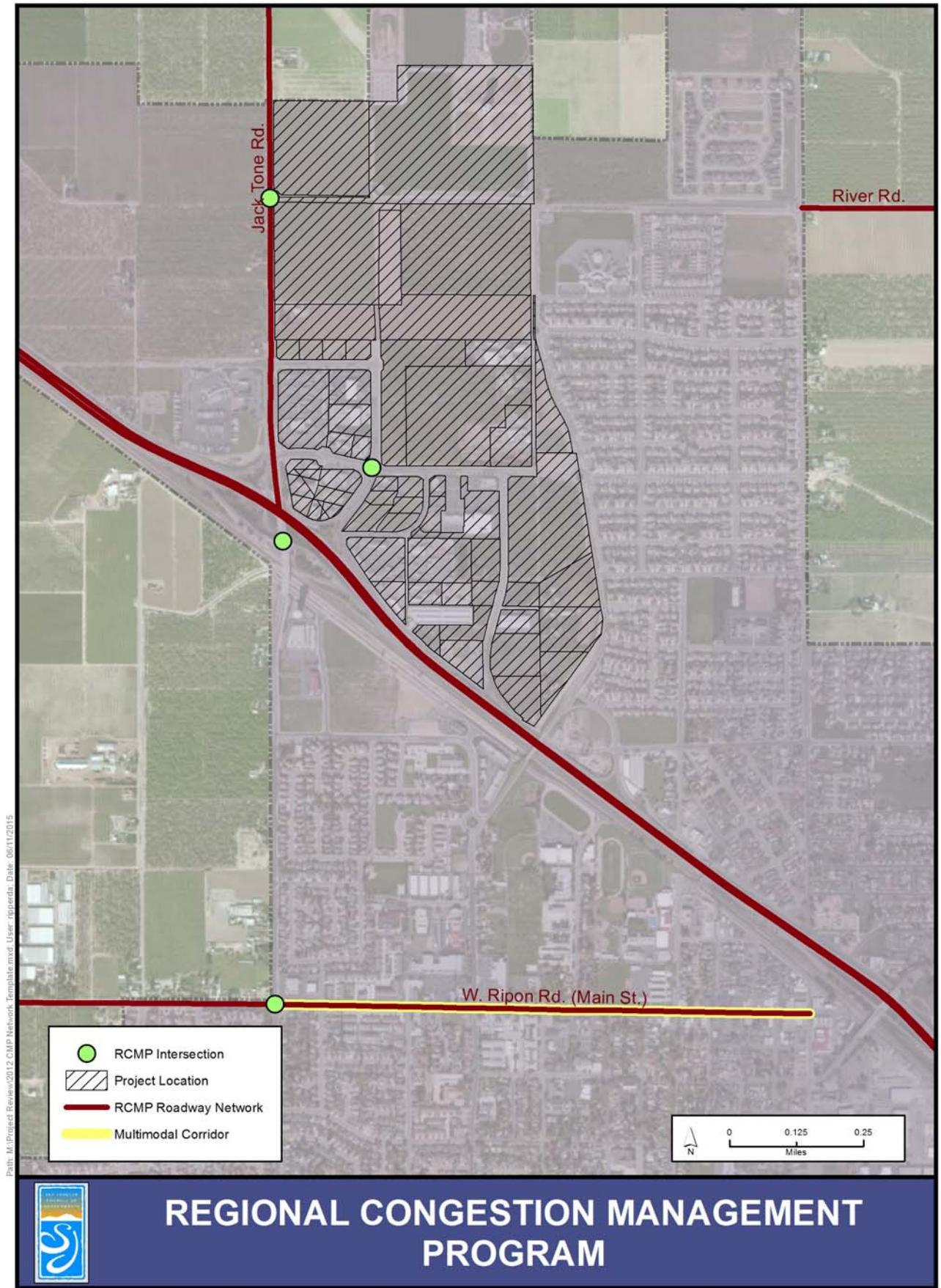
Sincerely,



Kim Anderson
SJCOG Senior Regional Planner

Attachments: CMA Comment Letter on Notice of Preparation
RCMP Network Map

COMMENT NO. 7 SAN JOAQUIN COUNCIL OF GOVERNMENTS





SAN JOAQUIN COUNCIL OF GOVERNMENTS

555 E. Weber Avenue • Stockton, California 95202

209.235.0600 • 209.235.0438 (fax)

www.sjcog.org

October 29, 2014

Steve Dresser
CHAIR

Anthony Silva
VICE CHAIR

Andrew T Chesley
EXECUTIVE DIRECTOR

Member Agencies
CITIES OF
ESCALON,
LATHROP,
LODI,
MANTECA,
RIPON,
STOCKTON,
TRACY,
AND
THE COUNTY OF
SAN JOAQUIN

Mr. Ken Zuidervaart
Director of Planning and Economic Development
City of Ripon, Planning Department
259 N Wilma Avenue, Ripon CA 95366

Re: Notice of Preparation (NOP) – North Point Specific Plan

Dear Mr. Zuidervaart:

Thank you for the opportunity to comment on the NOP for the North Pointe Specific Plan (NPSP) project. As the County's designated Regional Transportation Planning Agency (RTPA), the Congestion Management Agency (CMA), and the Metropolitan Planning Organization (MPO), the San Joaquin Council of Governments (SJCOC) has reviewed the above-referenced document.

Maintaining a Regional Congestion Management Program/Process is required by State Govt. Code, Section 65088 – 65089.10, the County's Measure K Renewal Ordinance, and federal congestion management process planning requirements. The primary purpose of the RCMP is to monitor the cumulative transportation impacts of growth of the regional roadway system, establish operational standards, identify deficient regional roadways, develop plans to mitigate or correct the deficiencies, and to facilitate travel demand management and operational preservation strategies for existing and planned development.

On November 15, 2012 the SJCOC Board of Directors adopted the 2012 update to the Regional Congestion Management Program. Chapter 6 of the 2012 RCMP describes the updated Land Use Analysis Program, including Tier 1 and Tier 2 review/analysis requirements, analysis methods, impact significance criteria, and mitigation. The program plan is available at the following link: <http://www.sjcog-rcmp.org/>.

The trip generation for this project is expected to trigger a "Tier 2 Review". A Tier 2 review will entail addressing the Tier 1 consistency review as well as a quantitative analysis of RCMP impacts – project specific and cumulative plus project conditions. Please refer to Chapter 6 of the 2012 RCMP for details regarding analysis/mitigation requirements for land development projects.

The DEIR should contain a section that specifically addresses requirements and standards of the RCMP, which includes the Regional Travel Demand Management Action Plan.

Travel Demand Management

Travel demand management is an integral part of San Joaquin's congestion management program. To show consistency with the Regional Travel Demand Management Plan, the DEIR should include a detailed look at options that will provide support for trip reduction planning.

The NPSP should be conditioned to ensure that, as development plans are processed, they include provisions to promote participation in San Joaquin COG's Commute Connection program (www.commuteconnection.com). Commute Connection is the regional rideshare program operated by the San Joaquin Council of Governments whose mission is to reduce traffic congestion and improve air quality. The program is designed to help commuters make the transition from driving alone to a convenient ridesharing option such as carpooling, vanpooling, bicycling/walking or riding transit. The program serves San Joaquin, Stanislaus, and Merced Counties. The program includes free services such as commuter ride-matching, Guaranteed Ride Home and Employer Services.

The following development types require coordination with Commute Connection services/programs:

- All business or industrial parks
- All event centers or stadiums
- Schools with greater than 150 students
- All commercial, industrial, and retail offices with greater than 50 full-time equivalent employees

As a means of mitigating any potential significant effect regarding a conflict with adopted policies, plans, or programs supporting alternative transportation SJCOG requests that measures be added that will ensure that future development per the NPSP will include provisions for alternative travel and that the land uses listed above will participate in SJCOG's Commute Connection Program.

Surface Transportation Assistance Act (STAA) Terminal Access Routes

The proposed project includes a variety on non-residential development that may depend on large trucks for the movement of goods. If these operations will depend on STAA rated trucks to serve their needs the roadways must be designed and built to accommodate STAA rated trucks.

Regional Transportation Impact Fees as Mitigation

For projects subject to RCMP review, the Regional Traffic Impact Fee (RTIF) program establishes a specific mitigation fee program relative to cumulative regional impacts. To satisfy these requirements, project applicants are required to pay their fair share contribution into the RTIF program. These "fair share" contributions must be committed to funding priorities established in the CIP of the RCMP, the RTP, or the Federal TIP.

However, to better inform the public and stakeholders, the environmental document's mitigation language must convey that payment into the RTIF program does not guarantee that the lead agency (local agency) will necessarily spend these developer fees on the identified mitigation improvement. SJCOG will administer the RCMP/RTIF

Mitigation Monitoring Program to track the “actual” funding/implementation of identified mitigation improvements (i.e., conditions of approval) identified as part of environmental documents. SJCOG will periodically report each local agency’s implementation progress of identified mitigation measures as part of mandated RCMP and RTIF program compliance hearings to the SJCOG Board. SJCOG will also provide this status update mitigation improvement information to local agencies as part SJCOG’s state and federal flexible funding cycle “call for projects”.

Consistency with other Regional Plans

As stipulated within the RCMP Project Review Criteria in Chapter 6 of the 2012 RCMP, the DEIR is required to show consistency with all applicable regional transportation planning documents, such as:

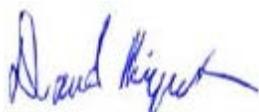
- Regional Transportation Demand Management Plan
- Park-and-Ride Master Plan
- Regional Bicycle, Pedestrian, and Safe Routes to School Master Plan
- Regional Smart Growth Transit Oriented Development Plan
- Regional Transit Systems Plan
- Regional Transportation Impact Fee Program
- Regional Transportation Plan
- Interregional STAA Study for I-5 and SR-99

SJCOG staff is available to assist with project specific guidance and narrowing the scope of the relevant regional plans that need to be included within the EIR.

Lastly, if any new principal arterials will be built to serve this planning area, Govt. Code 65089 requires that the arterial(s) be designated as part of the state RCMP system.

Thank you for the opportunity to review and comment on this project. Please forward all documents to this office. If you have any questions please call RCMP staff David Ripperda, at (209) 235-0450, or Kim Anderson at (209) 235-0565. We would be pleased to meet with the city to provide any necessary information, support and guidance.

Sincerely,



David Ripperda
SJCOG Regional Planner

Attachments: 2012 RCMP, Chapter 6_Land Use Analysis Program

CHAPTER 6

Land Use Impact Analysis Program

CHAPTER 6 LAND USE IMPACT ANALYSIS PROGRAM

6.1 INTRODUCTION

A CMP must contain a program to analyze the impacts of land use decisions made by local jurisdictions on regional transportation systems. The program must generally be able to estimate the costs associated with mitigating those impacts, as well as provide credits for local public and private contributions to improving regional transportation systems. The program described in this chapter meets this requirement. To comply with this state mandate, SJCOG and its member agencies have integrated a “regional layer” of review within the CEQA review process. Extending the scope of CEQA EIR traffic studies to include impacts to the CMP system has been considered by all the State’s CMA’s as the most expeditious way to implement the CMP Land Use Analysis element.

The legislative intent of the CMP Land Use Analysis Program (LUAP) is to improve the linkage between local land-use decisions with regional transportation facility improvement needs; to better address the impacts of development in one community on another; and, to promote information sharing between local governments when the decisions made by one jurisdiction have an impact on another. As part of the annual Measure K and biennial state CMP reporting requirements, SJCOG is required to evaluate the efforts made by each local jurisdiction within San Joaquin County to ensure compliance with this state program statute (see Chapter 10). Hence, SJCOG must evaluate the efforts made by each jurisdiction to ensure that proposed land use projects comply with the established RCMP Land Use Analysis requirements.

Given that the RCMP Land Use Analysis Program directly interfaces with established local agency land use review programs, it is important that the following components of the program are clearly described, measurable, and understandable:

- RCMP Traffic Impact Criteria
- RCMP Traffic Impact Significance Criteria
- RCMP Traffic Mitigation Measures
- RCMP Analysis Methods

6.2 LAND USE PROJECTS REVIEW CRITERIA

The following describes the types of proposed projects that trigger RCMP review. RCMP land use category summary descriptions are provided in Appendix D. It should be noted that SJCOG is not a land use authority, and as such it will not seek to approve or disapprove land use projects. All land use development projects are subject to RCMP review unless the project meets the following criteria:

1. The project is statutorily or categorically exempt from the California Environmental Quality Act (CEQA), as detailed in Guidelines for Implementation of the California Environmental Quality Act, Articles 18 and 19.
2. The project is subsequent to the land uses approved within a Master EIR, Negative Declaration, or other environmental analysis and the land use agency determines that the project is within the scope of the previously

approved project per CEQA Guidelines 15177-15179.5. This criteria does not apply to projects subsequent to Program EIRs (such as General Plans), unless exempt otherwise from CEQA.

Project referral should be submitted as soon as the jurisdiction receives the application. Within 30 days of receipt, SJCOG staff will provide preliminary comments and determine the level of review to be completed as part of the CEQA process (Tier 1 or Tier 2) per the guidelines given below. For most Tier 1 projects, the CMA review will be complete at this stage.

The purpose of the review will be to ensure that proposed projects are consistent with regional planning documents (Tier 1 Review) and that their effects on the regional transportation system are analyzed (Tier 2 Review), as described in further detail below.

Tier 1 Review

All development projects will be qualitatively reviewed for consistency with SJCOG’s regional planning documents, including one of more of the following, as appropriate:

- Regional Transportation Demand Management Plan
- Regional Expressway System Plan (System Management and TDM components)
- Park-and-Ride Master Plan
- Regional Bikeway Plan
- Smart Growth Infill Opportunity Zone Plan
- Regional Transit Systems Plan
- Regional Transportation Impact Fee Program
- Regional Transportation Plan
- Interregional STAA Study for I-5 and SR-99

Tier 2 Review

Projects that trigger the one or both of the following thresholds will be subject:

1. 125 or more vehicle trips during weekday AM or PM peak-hours; or,
2. 500 or more total daily vehicle trips on any day of the week.

As defined above, all development projects regardless of trip generation characteristics will be at a minimum reviewed for consistency with applicable regional planning documents. Triggering a quantitative Tier 2 review will entail addressing the Tier 1 consistency review as well as a quantitative analysis of RCMP impacts – project specific and cumulative plus project conditions.

It should be noted that SJCOG’s ability to comment should not be interpreted as an authority to reject development applications.

6.3 RCMP IMPACT SIGNIFICANCE CRITERIA

To determine whether project added traffic constitutes a significant impact to the RCMP network, the following significance criterion is established.

Tier 1 Development Projects

Projects subject to Tier 1 reviews will be not subject to specific “significance criteria”. SJCOG will notify a project sponsor of any recommended design consideration, mitigation measures and/or conditions that should be carried forward in the final approval. After project approval, the lead agency will submit the Mitigation Monitoring and Reporting Plan (MMRP) and/or final project conditions to SJCOG. The Project and applicable elements of the MMRP/Final Project Conditions will be recorded for reference when preparing the annual Measure K and biennial State CMP reports, which require disclosure of jurisdictional compliance.

Tier 2 Review

A proposed development will have a significant impact to the RCMP network if any one of the following criteria is met during the AM or PM peak hours:

1. For any RCMP roadway or intersection currently operating or expected to operate at LOS D or better under No Project conditions, the project-added traffic results in LOS E or F operating conditions
2. For RCMP intersections or roadways currently operating or expected to operate at LOS E or F under No Project conditions, the project results in increases to:
 - average delay by 4 seconds or more; or,
 - the volume-to-capacity (v/c) ratio by 1.0 or more
3. Conflicts with SJCOG adopted/approved Regional Plans applicable to the project. During the project review period, SJCOG staff will identify any inconsistencies with regional planning documents, such as:
 - Regional Transportation Demand Management Plan
 - Regional Expressway System Plan (System Management and TDM components)
 - Park-and-Ride Master Plan
 - Regional Bikeway Plan
 - Smart Growth Infill Opportunity Zone Plan
 - Regional Transit Systems Plan
 - Regional Transportation Impact Fee Program
 - Regional Transportation Plan
 - Interregional STAA Study for I-5 and SR-99

State and local agency significance criteria may be more or less stringent than the RCMP significance criteria described above. Note that the RCMP significance criteria will not require additional analysis work performed for TIAs but will require RCMP impacts, as well as their significance after mitigation, to be explicitly identified in the TIA and environmental documentation.

6.4 MITIGATION MEASURES

State law places responsibility for the RCMP Land Use Analysis Program on local jurisdictions, since they retain the power to approve or deny land development applications. SJCOG can assist cities and the County in determining regional traffic impacts, but the Lead Agency is responsible for determining how to mitigate these impacts and what the cost will be to do so. SJCOG encourages local agencies to require development proj-

ects to cover the costs of mitigating transportation impacts, but the decision to do so rests with the city or County.

If the RCMP significance criteria are exceeded and feasible mitigation is not identified to mitigate the impact to less than significant levels, the impact must be identified as significant and unavoidable.

1. SJCOG's policy regarding mitigation measures for capital improvement projects is:
 - RCMP mitigation measures must be adequate to allow the RCMP roadway to meet the RCMP LOS standard
 - RCMP mitigation measures for project specific impacts must be fully funded to be considered adequate;
 - RCMP mitigation measures that rely on state or federal funds directed by or influenced by SJCOG must be consistent with project funding priorities established in the CIP of the RCMP and the RTP, or the Federal TIP; and,
 - For RCMP mitigation measures that involve a local or regional “fair share” contribution for mitigating RCMP cumulative impacts, the fee must be committed to funding priorities established in the CIP of the RCMP, the RTP, or the Federal TIP. The SJCOG Regional Traffic Impact Fee (RTIF) program establishes a RCMP specific mitigation fee program relative to cumulative regional impacts. To satisfy these requirements, project applicants are required to pay their fair share contribution into the RTIF program. However, to better inform the public and stakeholders, the environmental document (i.e., mitigation language) must convey that payment into the RTIF program does not guarantee that the lead agency (local agency) will necessarily spend these developer fees on the identified mitigation improvement. SJCOG will administer the RCMP/RTIF Mitigation Monitoring Program to track the “actual” funding/implementation of identified mitigation improvements (i.e., conditions of approval) identified as part of environmental documents. SJCOG will periodically report each local agency's implementation progress of identified mitigation measures as part of mandated RCMP and RTIF program compliance hearings to the SJCOG Board. SJCOG will also provide this status update mitigation improvement information to local agencies as part SJCOG's state and federal flexible funding cycle “call for projects”.
2. The RCMP also requires cumulative impacts to the RCMP network be addressed through the CEQA analysis process. The project analysis of traffic impacts to the RCMP network must reflect the most recently approved development projects from the lead agency as well as from adjacent jurisdictions. It should also include currently programmed infrastructure improvements.
3. As part of the RCMP Land Use Analysis Program, if a

RCMP intersection is projected to operate at LOS E or F (CEQA Cumulative and/or Cumulative Plus Project analyses) after trip exemptions have been accounted for, the affected jurisdiction can choose to proactively prepare a Deficiency Plan in lieu of waiting for the facility to possibly fail after the development is implemented. The benefit of preparing and adopting a RCMP deficiency plan based on a future year deficiency finding is that the identified improvements can be submitted/proposed for flexible funding cycle sooner (i.e., "call for projects"). Given the typical 7-10 year lag between the time a project is programmed till it is actually constructed/implemented, this proactive approach better ensures that identified improvements are implemented in a more timely manner – rather than long after a congestion problem becomes evident i.e., reactive.

Inter-Jurisdictional Impacts

A regional analysis based on local land use decisions will often involve more than one jurisdiction. For example, a large project approved by City A (Lead Agency) may affect traffic on a nearby principal arterial in City B (affected city). The RCMP places the responsibility for addressing the significant traffic impacts with the approving jurisdiction. However, SJCOG also recognizes that City A will need to work with City B in order to properly mitigate the traffic impacts on the affected segment. It is the preference of SJCOG that the lead agency work with any affected jurisdiction to arrive at a mutually agreeable plan for addressing the inter-jurisdictional impacts of a given project. If a dispute arises, or at the request of either party, SJCOG will assist both localities in preparing a mitigation plan that meets the requirements of this land use program.

6.5 REGIONAL TRAFFIC IMPACT FEES

The RCMP Land Use Program is intended to ensure that new development contributes a fair share and provides transportation improvements at the time of new construction. The SJCOG Regional Traffic Impact Fee (RTIF) program establishes a RCMP cumulative impact mitigation fee that serves to streamline the CEQA process as it relates to regional impacts.

All jurisdictions adopted and began implementation of the RTIF program by July 1, 2006. SJCOG monitors the local jurisdictions' collection and disbursement of the fee to ensure that the RTIF is being applied toward traffic mitigation projects that were identified in the development of the fee or towards regional impacts identified as part of the RCMP Land Use Analysis Program. Compliance monitoring is performed through SJCOG's annual audit process of local agency transportation funds.

A flow chart of the Land Use Analysis Program is provided in **Figure 6-1** on the following page. As alluded to at the bottom of the flow chart, RCMP compliance findings are in part determined based on local agency compliance with the RCMP Land Use Analysis Program. A detailed description of the SJCOG's RCMP conformance assessment process is provided in

Chapter 10. RCMP impacts and identified mitigations will be recorded for reference and disclosed as part SJCOG's annual Measure K and biennial State CMP compliance reports.

6.6 ANALYSIS METHODS

All RCMP analysis procedures will be based on the most recent HCM methodology (i.e., 2010 HCM) when reliable software implementations are available. This includes basic freeway, multi-lane highway, two-lane highway and intersections.

Generally, vehicle trip generation should be based on the most current Trip Generation informational report published by the Institute of Transportation Engineers (ITE). The published trip generation estimates are often described for both the peak hour of the land use (generator) and for the peak hour of adjacent street traffic. For analyzing the study threshold criteria, trip generation for the peak hour of adjacent street traffic should be used if available. If not available, trip generation for the peak hour of the generator can be substituted. If the land use is not specifically represented in the ITE trip generation rates, then an estimate of the project's trip generation should be conducted and fully documented using estimation methodologies normally accepted in the fields of traffic engineering and transportation planning. Use of specific trip generation studies or other trip generation information sources (e.g., San Diego Association of Governments trip rates) will be considered on a case by case basis.

6.7 REGIONAL TRAFFIC MODEL

SJCOG's regional traffic model is an integral component of the Land Use Analysis Program, and its maintenance is a requirement of both the State CMP legislation and the Measure K Ordinance.

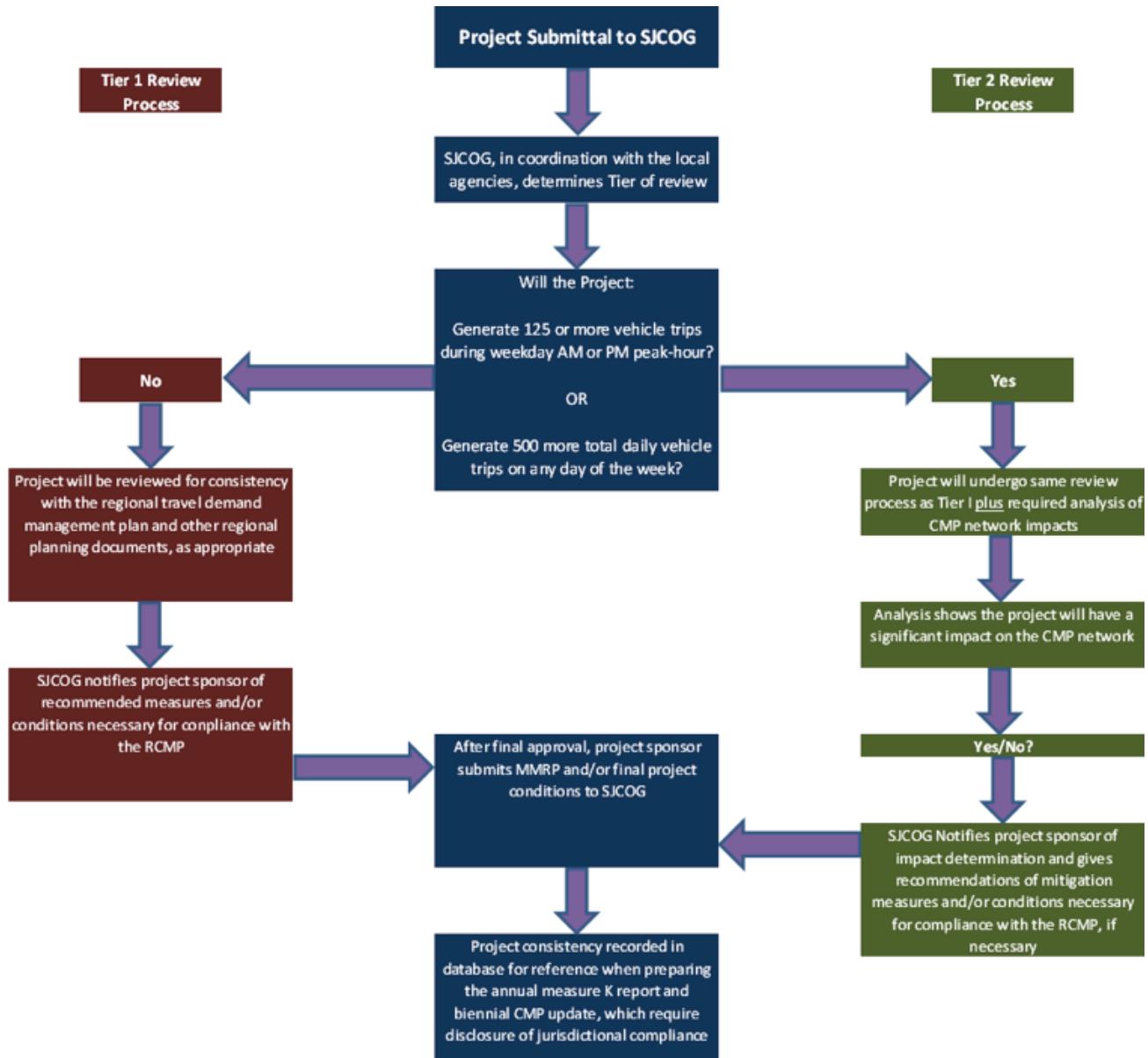
The following model applications are used to assist in the implementation of the RCMP Land Use Analysis Program.

Regional Traffic Model Details

- Helping to determine a development project's trip distribution (select zone analysis)
- Per California Code Section 65089.4, interregional trips are exempt from triggering the need for RCMP Deficiency Plans. SJCOG's model is used for estimating the extent of interregional trips from outside the San Joaquin County i.e., Stanislaus County, the Sacramento region, the entire Bay Area, Calaveras County, and Amador County (see Chapter 7).

These analyses can be deferred to or used in combination with local jurisdiction travel models that can demonstrate to meet state/federal guidelines for model calibration/validation.

Figure 6-1. RCMP Land Use Analysis Program



Lead Agency Responses to Comment #7, San Joaquin Council of Governments, June 11, 2015

Response 7A: This comment addresses the North Pointe Specific Plan but not the EIR. No response is required in the context of CEQA. The NPSP will be revised to reflect this comment as appropriate.

Response 7B: This comment notes that the commenter's NOP comment letter was not included in the DEIR. This was an oversight on the City's part. The SJCOG NOP letter was attached to their DEIR comment letter and is incorporated into the Final EIR as shown on the pages following these responses.

Response 7C: This comment expresses the opinion that the NPSP DEIR did not address the RCMP standards, which apply to "proposed development projects;" a significant effect will occur on roadways and intersections with Level of Service E or F; at intersections already at LOS E or F under No Project conditions, a significant effect will occur with certain increases in delay.

The modeling results reported in the DEIR indicated that the NPSP would not result in significant effects (LOS E or F) on any road segments in the NPSP area; SJCOG concurs with this conclusion. Trip generation that would occur if the NPSP is adopted would be substantially less than trip generation caused by development under existing general plan designations and zoning.

The City's analysis of transportation impacts was limited to roadway segment analysis and did not include intersection analysis. This is consistent with the programmatic nature of the NPSP and with the specificity provisions of CEQA. The NPSP is not a "development project" and no data is available to support more detailed traffic analysis.

A more extensive explanation of the City's methodology was described in Chapter 17.0 of the DEIR. Further explanation is provided in the City's response to comments from Caltrans (Comment #4) in this section of the FEIR.

The comment indicates, correctly, that the EIR did not report the effects of the project on W Ripon Road/Main Street; however, existing plus project and future traffic on this roadway segment, which is not in the immediate vicinity of the NPSP area, was modeled in conjunction with the other segments reported in the EIR. According to the modeling results, the project would not have any significant effects along this roadway segment; that is, NPSP traffic would not result in any LOS E or F conditions along W Ripon Road/Main Street.

The commenter provides additional transportation information, which was attached to the comment letter. This information is included in this section and thereby incorporated in the FEIR. The commenter recommends incorporation of its biennial technical monitoring of the RCMP network and provided a website where that information could be reviewed www.sjcohrcmp.org/. That information is hereby incorporated into the EIR by reference.

Response 7D: In this comment SJCOG recommends that the City condition development projects that meet the size criteria specified in the comment letter to participate in the Commute Connection program. The City appreciates this recommendation and the request for City participation in regional transportation management. The City will consider this recommendation in conjunction with projects meeting the specified size criteria.

4.0 ERRATA

This section of the Final EIR identifies corrections made, and/or the addition of new or revised information, to the EIR. These changes are made in response to specific comments received during the public and agency review period as described in Chapter 3.0. The errata may also include any relevant information that has become available to the County since publication of the DEIR.

The errata are arranged in accordance with the chapter numbering system of the DEIR. The specific location of each correction, addition or other change is referenced to the page and paragraph of DEIR as published by the City of Ripon on May 1, 2015.

NO ERRATA HAVE BEEN IDENTIFIED TO DATE (JUNE 24, 2015)

Appendix A
EIR Public Review Distribution Material

ASSESSOR RECORDER
COUNTY CLERK
KENNETH W. BLAKEMORE

2015 MAY - 1 PM 3:26

SAN JOAQUIN COUNTY

BY 
DEPUTY

CITY OF RIPON

NOTICE OF AVAILABILITY

NORTH POINTE SPECIFIC PLAN
DRAFT ENVIRONMENTAL IMPACT REPORT

NOTICE IS HEREBY GIVEN that the City of Ripon has prepared a Draft Environmental Impact Report (DEIR) to describe the environmental effects of the proposed North Pointe Specific Plan (NPSP). The 310-acre NPSP area is in the City of Ripon; the area is north of SR 99, east of Jack Tone Road and west of Fulton Avenue and includes Mistlin Sports Park and land to the south.

The area is within the City limits and designated for urban development in the Ripon General Plan; the area is presently served with urban streets and utility services. The NPSP provides a more detailed vision for future development, modifies existing land uses and sets more detailed policy that will result in a vibrant, attractive, well-organized and pedestrian-friendly urban space with a distinct character, one that provides new local job opportunities and is supportive of the existing downtown. The NPSP will change overall land use plans by adding residential development, and will result in a net reduction in development intensity. With the NPSP, development would include an estimated 1,050 medium and high-density residential units and 1.7 million square feet of non-residential uses.

The DEIR identifies potentially significant environmental effects on air quality, cultural resources, hazards and noise that can be mitigated to a less than significant level. The DEIR relies on the Ripon General Plan EIR's previous analysis of the effects of urban development on agriculture, traffic and air quality. The project does not involve any significant unavoidable environmental effects that were not adequately addressed in the Ripon General Plan EIR.

The City of Ripon (as Lead Agency) is seeking agency and public comment on the DEIR. If you represent a public agency, please provide information that is germane to your statutory responsibilities as they may be affected by this project.

The DEIR is available for review at the following locations: Ripon City Hall, 359 N Wilma Avenue and the Ripon Library, 333 W Main Street, Ripon, CA 95202 during business hours. The DEIR will also be available for review or download in the "News" section of the Ripon web site Home Page <http://www.cityofripon.org/>. Electronic copies of the EIR will be provided by email on request. Printed copies may be obtained from the City on request for the cost of reproduction.

A 45-day public review period will begin on May 1, 2015 and end on June 15, 2015. Written comments should be submitted to the address below prior to 5:00 p.m., Monday, June 15, 2015.

Please submit comments by mail,
fax or email to:

Ken Zuidervaart
Community Development Director
City of Ripon
259 N Wilma Avenue
Ripon, CA 95366
Phone: 209-599-2108
Fax: 209-599-2685
Email: kzuidervaart@cityofripon.org

2015052005
Appendix C
Verified by phone, received
SCH # 5/1/15, public review
starts 5/1/15

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

Project Title: North Pointe Specific Plan

Lead Agency: City of Ripon

Contact Person: Ken Zuidervaart

Mailing Address: 259 Wilma Avenue

Phone: 209-599-2108

City: Ripon

Zip: 95366

County: San Joaquin

Project Location: County: San Joaquin

City/Nearest Community: Ripon

Cross Streets: Jack Tone Road and Colony Drive

Zip Code: 95366

Longitude/Latitude (degrees, minutes and seconds): 37 ° 05 ' 02 " N / 121 ° 08 ' 15 " W Total Acres: 310

Assessor's Parcel No.: Several

Section: 18, 19 Twp.: 2 S Range: 8 E Base: MDBM

Within 2 Miles: State Hwy #: SR 99

Waterways: Stanislaus River

Airports: None

Railways: Union Pacific

Schools: Park View Elementary

Document Type:

CEQA: NOP Draft EIR
 Early Cons Supplement/Subsequent EIR
 Neg Dec (Prior SCH No.) _____
 Mit Neg Dec Other: _____

NEPA: NOI EA
 Draft EIS FONSI

Other: Joint Document
 Final Document
 Other: _____

Local Action Type:

<input type="checkbox"/> General Plan Update	<input checked="" type="checkbox"/> Specific Plan	<input checked="" type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input checked="" type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision, etc.)	<input type="checkbox"/> Other: _____

Development Type:

<input checked="" type="checkbox"/> Residential: Units <u>1,050</u> Acres _____	<input type="checkbox"/> Transportation: Type _____
<input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Mining: Mineral _____
<input checked="" type="checkbox"/> Commercial: Sq.ft. <u>1.5 M</u> Acres _____ Employees _____	<input type="checkbox"/> Power: Type _____ MW _____
<input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Waste Treatment: Type _____ MGD _____
<input type="checkbox"/> Educational: _____	<input type="checkbox"/> Hazardous Waste: Type _____
<input type="checkbox"/> Recreational: _____	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Water Facilities: Type _____ MGD _____	

Project Issues Discussed in Document:

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Vegetation
<input checked="" type="checkbox"/> Agricultural Land	<input checked="" type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Forest Land/Fire Hazard	<input type="checkbox"/> Septic Systems	<input checked="" type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Archeological/Historical	<input checked="" type="checkbox"/> Geologic/Seismic	<input checked="" type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Growth Inducement
<input type="checkbox"/> Coastal Zone	<input type="checkbox"/> Noise	<input type="checkbox"/> Solid Waste	<input type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Population/Housing Balance	<input checked="" type="checkbox"/> Toxic/Hazardous	<input type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Traffic/Circulation	<input type="checkbox"/> Other: <u>Greenhouse Gases</u>

Present Land Use/Zoning/General Plan Designation:

Commercial, AG, Residential, Park / Mixed Use, Commercial, Park, Professional Office / Mixed Use, Highway Service, Park, Office

Project Description: (please use a separate page if necessary)

Approval of Specific Plan for future development of a portion of the North Pointe Planning District in the City of Ripon.

Planned future development includes residential, retail commercial, retail campus technical research, park and sports-related commercial. Full build-out of the Specific Plan is expected to occur over the next 25 years, in conjunction with the current Ripon General Plan.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X". If you have already sent your document to the agency please denote that with an "S".

<input type="checkbox"/> Air Resources Board	<input type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input type="checkbox"/> California Emergency Management Agency	<input type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # 10	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # 5
<input type="checkbox"/> Caltrans Planning	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # 2	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> Forestry and Fire Protection, Department of	<input type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	
<input type="checkbox"/> Health Services, Department of	Other: _____
<input type="checkbox"/> Housing & Community Development	Other: _____
<input checked="" type="checkbox"/> Native American Heritage Commission	

Local Public Review Period (to be filled in by lead agency)

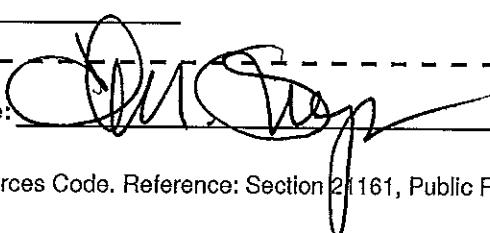
Starting Date May 1, 2015

Ending Date June 15, 2015

Lead Agency (Complete if applicable):

Consulting Firm: BaseCamp Environmental
Address: 6653 Embarcadero Drive, Suite A
City/State/Zip: Stockton, CA 95219
Contact: Charles R Simpson
Phone: 209-956-2121

Applicant: City of Ripon
Address: 259 Wilma Avenue
City/State/Zip: Ripon, CA 95366
Phone: 209-599-2108

Signature of Lead Agency Representative: 

Date: 5/1/2015

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Contact Group Name:

_North Pointe Specific Plan

Members:

Agnes Timmerman (Riemersma)	luvsdutch@gmail.com
Al Zurilgen	alzurilgen@yahoo.com
Bruce DenDulk	bruce@dendulk.com
Carla Escola	cescola@verizon.net
Chad DeGraff	chad@degraffdevelopment.com
Chris Ray	chrisray@serenogroup.com
Christamarie80@gmail.com	Christamarie80@gmail.com
Cliff Jorgensen	Cliff@cliffjorgensen.com
Curt Daggett	cdagsgo@yahoo.com
Dave Duncan	Ripondave10@aol.com
David Fissel	dfissel@interorealestate.com
Debbie Svopa	Flashdebbie@aol.com
Dennis Wilson	surfsupdw@yahoo.com
Fausto Velasco	fvelasco@freedom-fire.net
Gaynl Trotter	irwintrotter@yahoo.com
George Saljian	gsaljian@gmail.com
Ginger Eskes	veskes@verizon.net
Gordon Lucas	boe@integrity.com
Henry Riemersma	friesianriemersma@yahoo.com
Hope Sandoval	hope@realtorhopesandoval.com
Jaime Fountain	chevgrl30@aol.com
Jenny Barros	jennys.avon@yahoo.com
Jim Crecelius	jcrecelius8@hotmail.com
Jiri Stepan	jiri.stepan.g@gmail.com
John Heida	jheida@gmail.com
Jon Bogetti	jonbogetti@gmail.com
Joseph Mangelos	joe@barnwoodarms.net
Kristin Hogan	hogank@yosemite.edu
Kristin Nyvold	kristinnyvold@gmail.com
Kun Yoo	kunjdeyoo@hotmail.com
Marcia Cwick	mcbearlythere@gmail.com
Mark Van Groningen	vgorchards@verizon.net
Mark Wilbur	mcrwb@aol.com
Mark Winchell	mwinchell@charter.net
martinsreyno@gmail.com	martinsreyno@gmail.com
Mary Machado	mmachado@sjcoe.net
rachellenorman1993@gmail.com	rachellenorman1993@gmail.com
Ralph Scheel	rnscss@aol.com
Red Nutt (ERednutt@aol.com)	ERednutt@aol.com
Rob Wagner	robbie.wagner@gmail.com
Rod Lowe	lowerod@comcast.net
Russ Munson	russ@winerose.com
Scott Kane	skmanagement1408@aol.com
Shannon Esenwein	cpamom@gmail.com

Steve Wells
steve&bobbie Riemersma
Ted Madzey
Tom Wilson

CCANDWS@charter.net
bobbie.riemersma@bankofthewest.com
muggsmad@gmail.com
Tom@MantecaHomes.com