

Stanislaus County Planning and Community Development

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CEQA INITIAL STUDY

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

1.	Project title:	Use Permit Application No. PLN2014-0065 - K&R Blount Dairy
2.	Lead agency name and address:	Stanislaus County 1010 10th Street, Suite 3400 Modesto, CA 95354
3.	Contact person and phone number:	Rachel Wyse, Associate Planner (209) 525-6330
4.	Project location:	724 Ruble Road, on the south side of Ruble Road, north of W. Linwood Avenue, west of Crows Landing Road, in the Crows Landing area. APN: 058-005-014.
5.	Project sponsor's name and address:	Joe Ramos, F & R Ag Services, Inc. 2857 Geer Road, Ste. A Turlock, CA 95382
6.	General Plan designation:	Agriculture
7.	Zoning:	A-2-40 (General Agriculture)

8. Description of project:

The application is a request to increase the milk/dry cows by 540 head for a total of 1,240 milk cows, 200 dry cows, and 500 large heifers, thereby generating additional waste. The facility currently houses 800 milk cows, 100 dry cows, and 680 total heifers. There will be an estimated increase of one milk truck trip, one commodity truck trip, and two employee trips per day. The existing dairy is improved with corrals, milking facilities, and waste storage structures. The proposed project requires the construction of a 35,000 square foot free-stall barn northeast of the current footprint. Nutrients produced by the herd are utilized to fertilize 180± acres of irrigated cropland farmed by the applicants. The dairy's existing Waste Management Plan (WMP) and Nutrient Management Plan (NMP) were revised to account for the increase in waste and resulting storage and disposal needs associated with the increase in herd size.

Regional Water Quality Control Board (RWQCB) staff have determined that the revised NMP and WMP are adequate and will insure that the plans are in accordance with the standards outlined in the General Order and that thorough implementation of these plans will minimize the impacts of animal waste on surface and groundwater quality. The SJVAPCD has determined that, based on additional emission information provided to the District, project specific emissions criteria pollutants are not expected to exceed District significance thresholds of 10 tons/year NOX, 10 ton/year ROG, and 15 tons/year PM10; therefore, the District concludes that project specific criteria pollutant emissions would have a less than significant impact on air quality.

9.	Surrounding land uses and setting:	Row crops and scattered single family dwellings in the surrounding area, and unrelated dairies to the south and west.		
10.	Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):	Regional Water Quality Control Board San Joaquin Valley Air Pollution Control Distri Department of Environmental Resources Hazardous Waste Division Building Permits Division CA Department of Fish and Wildlife US Fish and Wildlife Service		
11.	Attachments:	Maps Revised Waste Management Plan and Attachments Nutrient Management Plan Air Quality Documentation Early Consultation Referral Responses		

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

□ Aesthetics	Agriculture & Forestry Resources	☐ Air Quality
☐ Biological Resources	Cultural Resources	Geology /Soils
Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	Hydrology / Water Quality
Land Use / Planning	Mineral Resources	□ _{Noise}
□ Population / Housing	□ Public Services	□ Recreation
Transportation/Traffic	Utilities / Service Systems	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Rachel Wyse, Associate Planner Prepared By

May 18, 2015

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration.

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

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) the significant criteria or threshold, if any, used to evaluate each question; and

b) the mitigation measure identified, if any, to reduce the impact to less than significant.

I. AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				Х
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				Х
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			х	
Discussion: Any development resulting from this project will be c itself is not considered to be a scenic resource or a unique scenic vista facilities/structures. The existing structures are comprised of metal wh in and around the A-2 (General Agriculture) zoning district. The app free-stall barn over the existing northernmost corrals within the facility. project to address glare from any previously installed or any propose	a. The site is nich is a mate licant is prop . Standard co	currently develop rial consistent wit osing to construct nditions of appro	bed with existing th accessory s ot a 35,000 sq oval will be add	ng "dairy" tructures uare foot
Mitigation: None.				
References: Stanislaus County General Plan and Support Docun	nentation ¹ .			
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				x
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				х

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

Discussion: Nutrients produced by the herd are utilized to fertilize 180± acres of irrigated cropland farmed by the applicants. The parcels used for nutrient spreading changes over time; however, the 180± currently utilized are located on APN Nos. 058-005-003, 058-005-012 thru 015, 058-022-013, and 058-007-016. The existing dairy facility is located at 724 Ruble Road, further identified as APN 058-040-041. The dairy facility parcel is enrolled in Williamson Act Contract No. 71-969 and has soils classified by the Farmland Mapping and Monitoring Program as being primarily "Prime Farmland", "Confined Animal Agriculture", and "Unique Farmland". Soils include Dinuba sandy loam, Fresno sandy loam, and Hilmar loamy sand.

This project will have no impact to forest land or timberland. This project will not conflict with any agricultural activities in the area and/or lands enrolled in the Williamson Act. The project was referred to the Department of Conservation, but a response has not been received to date.

Surrounding uses include unrelated dairies, various agricultural uses, farm houses, and outbuildings. The County has a Right-to-Farm Ordinance in place to protect agricultural operations from unjust nuisance complaints.

Mitigation: None.

References: USDA-NRCS Web Soil Survey; CA Department of Conservation California Important Farmland Finder; Stanislaus County Geographical Information Systems (GIS); and the Stanislaus County General Plan and Support Documentation¹.

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

e) Create objectionable odors affecting a substantial number of people?			x		
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Discussion: The project site is within the San Joaquin Valley Air Basin, which has been classified as "severe nonattainment" for ozone and respirable particulate matter (PM-10) as defined by the Federal Clean Air Act. The San Joaquin Valley Air Pollution Control District (SJVAPCD, District) has been established by the State in an effort to control and minimize air pollution. As such, the District maintains permit authority over stationary sources of pollutants.

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

The SJVAPCD responded to a previously circulated Early Consultation for the proposed project which consists of a request to increase the milk/dry cows by 540 head for a total of 1,240 milk cows, 200 dry cows, and 500 large heifers. There will be an estimated increase of one milk truck trip, one commodity truck trip, and two employee trips per day. The proposed project requires construction of a 35,000 square foot free-stall barn northeast of the current footprint. Nutrients produced by the herd are utilized to fertilize 180± acres of irrigated cropland farmed by the applicants.

The District is currently designated as extreme non-attainment for the 8-hour ozone standard, attainment for PM10 and CO, and non-attainment for PM2.5 for the federal air quality standards. At the state level, the District is designated as for the 8-hour ozone, PM10, and PM2.5 air quality standards. The District reviewed the project in September, 2014, but needed additional information to determine the project's potential impact on air quality. Consequently, SJVAPCD requested a more detailed investigation of project specific impacts such as construction emissions, operational emissions, nuisance odors, and health impacts. The applicant worked with the SJVAPCD to address the District's and thereby the County's concerns. The project impacts and findings of the detailed investigation of said impacts is discussed below.

Construction Emissions: Construction emissions are short-term emissions, evaluated separately from operation emissions. The District considers Construction Emissions of 10 tons per year of oxides of nitrogen (Nox), 10 tons per year of reactive organic gases [ROG, also known as volatile organic compounds (VOC)], or 15 tons per year particulate matter with an aerodynamic diameter of 10 microns or less (PM10) to be significant. The applicant provided the District with a Construction Emission Estimate which listed the type of emission, emission factor, number of pieces of equipment to be used, average horsepower, load factor, hours and days of operation, total hours per day of operation, total days of and hours of operation, and the resulting total emissions. The document also included a Construction Equipment Fugitive Dust Emissions breakdown. Based on the information in this document, County staff concurs with the District that the construction emission impacts of this project are less than significant.

Operational Emissions: Operational emissions are the ongoing emissions resulting from operation of the project. The District considers Operational Emissions of 10 tons per year of oxides of nitrogen (Nox), 10 tons per year of reactive organic gases (ROG, also known as VOC), or 15 tons per year PM10 to be significant. The District, while working with the applicant, ran preliminary calculations that indicated that the increase in Operational Emissions from stationary sources would be less than the District's significance thresholds. Staff has reviewed this information and concurs that the operational emissions for this project are less than significant.

Nuisance Odors: According to SJVAPCD, the project should be evaluated to determine the likelihood that the project would result in nuisance odors. Nuisance odors are subjective, thus the District has not established threshold of significance for nuisance odors. Nuisance odors may be assessed qualitatively taking into consideration project design elements and proximity to off-site receptors that potentially would be exposed to objectionable odors. The subject project is an existing dairy located in the A-2-40 (General Agricultural) zoning district. Chapter 9.32 Agricultural Land Policies requires purchasers and users of rural property be notified of the Right-to-Farm Ordinance; establishes that conditions (noise, odor, dust, etc.) resulting from agricultural operations, conducted in a manner consistent with proper and accepted customs and standards, are not a nuisance; and establishes a grievance committee to mediate disputes involving agricultural operations.

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Health Impacts: Project related health impacts should be evaluated to determine if emissions of toxic air contaminants (TAC) will pose a significant health risk to nearby sensitive receptors. The District considers the following to be significant health risks: a potential risk for carcinogens that equals or exceeds 1.0 for the maximally exposed individual. Based on review by the District, the health risk impacts resulting from this project are not expected to exceed the District's CEQA significance thresholds for health risk impacts.

The SJVAPCD did state that the project would be subject to Regulation VIII (Fugitive PM-10 Prohibitions), District Rules 4102 (Nuisance), 4601 (Architectural Coatings), 4641 (Cutback, Slow Cure, & Emulsified Asphalt, Paving & Maintenance Operations), 4550 (Conservation Management Practices), and 4507 (Confined Animal Facilities). In the event an existing building will be renovated, partially demolished, or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants). All comments provided by the District will be incorporated into the project's conditions of approval.

Mitigation: None.

References: Referral response from the San Joaquin Valley Air Pollution Control District dated September 23, 2014; Emails dated January 26 and February 10 between Joe Ramos, project applicant, and Ramon Norman, SJVAPCD staff; San Joaquin Valley Air Pollution Control District - Regulation VIII Fugitive Dust/PM-10 Synopsis; and the Stanislaus County General Plan and Support Documentation¹.

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IV. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			x	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			х	
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				x
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			х	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x

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Discussion: It does not appear this project will result in impacts to endangered species or habitats, locally designated species, or wildlife dispersal or mitigation corridors. The project site is an existing dairy facility improved with corrals, milking facilities, and waste storage structures and houses 800 milk cows, 100 dry cows, and 680 various sized heifers. The applicant is requesting to increase the milk/dry cows by 540 head for a total of 1,240 milk cows, 200 dry cows and 500 large heifers. The 28,000 square foot free-stall barn addition will be constructed within an existing corral within the existing dairy footprint. A 35,000 square foot free-stall barn will be constructed on land, northeast of the existing dairy footprint and flanked by a free-stall barn to the west, a dwelling to the north, farm buildings to the east, and corrals to the south. This area continues to be used for row crops and nutrient management pending approval of this project. The remaining portion of the site, not developed with structures or pens, is used as crop land in support of the dairy (see project description). No additional wastewater storage facilities will be constructed as existing lagoon capacity is sufficient for increased liquid waste resulting from the expansion. See the project's waste management plan and nutrient management plan incorporated herein' as a part of the Initial Study, for detailed information regarding waste and nutrient management.

Under the Clean Water Act, Concentrated Animal Feeding Operations (CAFOs) are defined as point source dischargers. The revised National Pollutant Discharge Elimination System (NPDES) CAFO regulation requires all CAFOs to apply for, and comply with, the conditions in an NPDES permit. The NPDES regulation describes which operations qualify as CAFOs and sets forth the basic requirements that will be included in all CAFOs' permits. A condition of approval will be added to the project requiring the applicant to comply with the revised NPDES regulation, if applicable.

The project was referred to the California Department of Fish and Wildlife (formerly the Department of Fish and Game) and the United States Fish and Wildlife Service for Early Consultation comments, but no response has been received to date.

Mitigation: None.

References: California Department of Fish and Wildlife (formerly the Department of Fish and Game) California Natural Diversity Database; and the Stanislaus County General Plan and Support Documentation¹.

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

Discussion: It does not appear this project will result in significant impacts to any archaeological or cultural resources. The applicant is proposing to construct a 28,000 square foot free-stall barn addition, within an existing corral, and a 35,000 square foot free-stall barn northeast of the current dairy structures. Minor ground disturbance will occur during the construction of footings to support the roof-only structures. Consequently, a standard condition of approval will be added to this project to address any discovery of cultural resources during any ground disturbing activities. The project was

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referred to the Native American Heritage Commission (NAHC) via the State Clearinghouse; the referral response recommended measures to take should historic and/or cultural resources be found on-site. Standard Conditions of Approval will be placed on the project providing historic and/or cultural resources are discovered during construction of the proposed structure.

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Mitigation: None.

References: Referral response dated July 22, 2014 from the Native American Heritage Commission; Stanislaus County General Plan and Support Documentation¹.

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

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

Mitigation: None.

References: Referral response from the Stanislaus County Building Permits Division dated July 25, 2014, California Building Code, Stanislaus County General Plan and Support Documentation - Safety Element ¹ .				
VII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			х	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			х	
Discussion: The Environmental Protection Agency (EPA) has issued a rule mandating that livestock facilities report methane and nitrous oxide emissions if they have manure management systems that emit 25,000 metric tons, or 55.1 million pounds, of carbon dioxide each day. The EPA further estimated that 3,200 mature dairy cows produce the 25,000 metric tons of annual carbon dioxide equivalent that would trigger reporting requirements. The USDA Agricultural Research Service's Northwest Irrigation and Soils Research laboratory, in Kimberly, Idaho, conducted a study on a 10,000 milking cow facility and found that emissions thresholds for 25,000 metric tons of annual carbon dioxide equivalent. K&R Blount Dairy currently is permitted by the RWQCB to have mature milk cows on-site. The current expansion request would increase the herd size to 1,240 milk cows, 200 dry cows, and 500 large heifers. It is important to note that some Stanislaus County dairy farmers sold off their cows in 2008 and 2009 to maintain milk prices. In 2007, there were 186,802 cows and 301 dairies in Stanislaus County. In 2011, there were 180±,416 cows and 232 dairies. As of 2012, there were 187,061 cows and 216 dairies. This project (K&R Blount Dairy) will add an annual amount of carbon dioxide to the region, but Planning staff believes it will be less than significant as the increase will generate less than 25,000 metric tons of annual carbon dioxide to the region, but Planning staff believes it will be less than significant as the increase will generate less than 25,000 metric tons of annual carbon dioxide equivalent. This project was referred to, reviewed by, and commented on by the San Joaquin Valley Air Pollution Control District (SJVAPCD).				
Mitigation: None.				
References: "Piloting Innovative Beef and Dairy GHG Emission Reduction Strategies in U.S. Feedlots and Dairies" www.csrwire.com/press_releases/33079-Innovativ; California Department of Food & Agriculture, California Dairy Statistics 2012 Data; referral response from the San Joaquin Valley Air Pollution Control District dated September 23, 2014; and the Stanislaus County General Plan and Support Documentation ¹ .				
VIII. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact

	 Included		
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?		х	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		x	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?		Х	

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d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	x	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	x	
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	х	
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?		х
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?		x

Discussion: Hazardous materials potentially used on site include: pipeline cleaning soap; acid cleaner; iodine; teat dip; refrigerant (R22) (used in the milk barn); formaldehyde and copper sulfate (used in cow foot baths); diesel fuel and gasoline (in tanks); motor oil hydraulic fluid; brake fluid; and antifreeze (for farm vehicle maintenance).

Pesticide exposure is a risk in agricultural areas. Sources of exposure include contaminated groundwater, which is consumed, and drift from spray applications. Application of sprays is strictly controlled by the Agricultural Commissioner and can only be accomplished after first obtaining permits. DER is responsible for overseeing hazardous materials in this area. The project was referred to the Hazardous Materials Division via the Environmental Review Committee; the ERC referral response indicated that the ERC had no comments in regards to this project.

The Envirostar database was accessed to determine if any of the properties were listed as potential hazardous waste or superfund sites. None of the properties included in this application were identified on this list; however, the parcel located west of the project site (APN: 058-005-011) was identified as Department of Defense Bombing Target No. 8, Crows Landing. According to the website the United States Army Corp of Engineers determined in 1999 that this site is a duplicate site to a Vernalis Bombing Target No 9 site. The Department of Toxic Substances Control did not concur in a 2008 letter. The Bombing Target site is separated from the dairy site's lagoons by Turlock Irrigation District's 60-foot wide Lateral No. 4.

Mitigation: None.

References: Department of Toxic Substances Control (www.envirostar.dtsc.ca.gov); and the Stanislaus County General Plan and Support Documentation¹.

IX. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?			х	

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?		x	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			x
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?		x	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?		x	
f) Otherwise substantially degrade water quality?		х	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			x
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			x
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			x
j) Inundation by seiche, tsunami, or mudflow?			х

Discussion: Run-off is not considered an issue because of several factors which limit the potential impact. These factors include a relative flat terrain of the subject site and relatively low rainfall intensities. Areas subject to flooding have been identified in accordance with the Federal Emergency Management Act. The project site itself is not located within a recognized flood zone and, as such, flooding is not an issue with respect to this project. The Stanislaus County Department of Public Works has reviewed the project and is requiring a grading, drainage, and erosion/sediment control plan as a part of the building permit for the free-stall barn. Consequently, run-off associated with the construction of the new structure will be reviewed as part of the overall building permit review process. No septic systems or additional wells are being proposed as a part of this project.

RWQCB determined that the project was subject to Waste Discharge Requirements (WDR) and that the WMP and NMP were sufficient for circulation with the Initial Study. The WMP and NMP were reviewed by RWQCB staff to determine if the amount of wastewater generated, utilized to wash down the facility, and applied to crops was in accordance with the standards outlined in the General Order and whether WDRs are needed. The purpose of these plans, and the General Order, is to insure that approved plans are designed and implemented to insure that the impact of animal waste on surface and groundwater quality is minimized and poses a less than significant impact on water quality. RWQCB staff have determined that the aforementioned plans are compliant with the General Order and that the existing lagoons are adequately sized to handle any additional waste resulting from the reorganization. Consequently, the potential for impacts to ground and surface water, water quality, and polluted run-off were determined to be less than significant.

Mitigation: None.

Stanislaus County Initial Study Checklist

References: Referral response from the Stanislaus County Depart Daniel Davis, RWQCB engineering geologist, dated April 15, 2015; Control Board dated December 8, 2014; K&R Blount Dairy's Waste Ma	referral resp	onse from the F	Regional Wate	er Quality
Stanislaus County General Plan and Support Documentation ¹ .				
X. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Physically divide an established community?				х
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				x
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				х
Confined Animal Facility Operations which require WDR and are the accordance with §21.20.030(F) of the Stanislaus County Zoning Ordi will be required to obtain Individual WDR as part of an expansion. The conservation plan or natural community conservation plan and will not Mitigation: None.	nance. CEQ nis project wil	A is required in in Il not conflict with	nstances when any applicab	re a dairy le habitat
References: Stanislaus County General Plan and Support Docun	nentation ¹ .			
XI. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				x
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				x
Discussion: The location of all commercially viable mineral resolution State Division of Mines and Geology in Special Report 173. There a				
Mitigation: None.				
References: Stanislaus County General Plan and Support Docun	nentation ¹ .			

XII. NOISE Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			x	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?				х
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?				х
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			х	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				x
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				х
Discussion: Noise impacts associated with on-site activities and acceptable level of noise. The project will increase ambient noise level of animal units is increased on site; however, noise associated with a will be a temporary increase in noise due to the construction of the free added limiting the hours of construction so as to lessen noise impacts are homes on neighboring properties. The nearest dwellings are located existing dairy facility footprint. The dwellings to the north and west dwellings to the east are ranchettes.	els. Perman nimals in the e-stall barns; to neighbors ted within 500	ent increases ma Agricultural zone however, a cond . The nearest se 0± feet to the nor	ay result as the e is permissibl lition of approvensitive noise r th, east and we	e number e. There val will be receptors est of the
Mitigation: None.				

References: Stanislaus County General Plan and Support Documentation¹.

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

Stanislaus County Initial Study Checklist				Page 16
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				x
Discussion: The proposed use of the site will not create significant be considered as growth inducing. No housing or persons will be displa existing corrals and the proposed 28,000 square foot free-stall barn as project is adjacent to large scale agricultural operations and the natized coning district.	aced by this p ddition and a	roject. The incre 35,000 square fo	ased animals bot free-stall b	will utilize arn. This
Mitigation: None.				
References: Stanislaus County General Plan and Support Docum	nentation ¹ .			
XIV. PUBLIC SERVICES	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			х	
Police protection?			х	
Schools?				х
Parks?				х
Other public facilities?			X	
Discussion: The County has adopted Public Facilities Fees, as w appropriate fire district, to address impacts to public services. Such permit issuance. The project was referred to school districts within Turlock Irrigation District (TID), and the Stanislaus County Environmen will be added to this project to insure that the free-stall barns will com respect to access and water for fire protection. On-site water storage any future building permit process. Referral responses were receiv comments regarding the need to map and protect existing irrigation License Agreement regarding the use of nutrient water and TID irrigat TID facilities. The ERC responded with "no comments at this time."	the area, the the area, the tal Review Co ply with all ap for fire prote ed from the l facilities, cor	uired to be paid Sheriff's office, ommittee (ERC). oplicable fire dep oction will be furth ERC and TID. T npliance with the	at the time o the local fire Conditions of artment stand er evaluated ID submitted terms of a R	f building authority, approval ards with as part of standard evocable

Mitigation: None.

References: Referral response from Turlock Irrigation District dated July 21, 2014; referral response from the Stanislaus County Environmental Review Committee dated July 28, 2014; and the Stanislaus County General Plan and Support Documentation¹.

XV. RECREATION	Potentially	Less Than	Less Than	No
XV. RECREATION	Significant Impact	Significant With Mitigation Included	Significant Impact	Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				x
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				x
Discussion: This project is not anticipated to increase significant typically are associated with residential development.	demands fo	r recreational fac	ilities as such	impacts
Mitigation: None.				
References: Stanislaus County General Plan and Support Docum	nentation ¹ .			
				-
XVI. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			х	
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the			х	
county congestion management agency for designated roads or highways?				
			х	
or highways? c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in			x x	

Page 18

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise		x
decrease the performance or safety of such facilities?		

Discussion: Significant impacts to traffic and transportation were not identified by reviewing agencies. According to the application, a maximum shift is comprised of four employees. Employee trips will increase by two trips per day to reflect the need for two additional milkers to milk the proposed additional cows. The number of daily customers/visitors on site at peak time is one. Furthermore, the applicant estimates that there will be a need for one additional transfer of heifers to and from the dairy per month from offsite feedlots resulting in an increase in 12 truck traffic trips, from 24 to 36, for cattle transfer per year. On-site veterinarian visits, trash service, and deliveries of fuel, seed, and dairy-related chemicals will continue to occur once a week. Commodity truck trips will increase from two per day to three; milk truck trips will increase from one to two. Prior to the expansion, the facility was not required to export any manure offsite. Based on the updated Nutrient Management Plan, increased herd size will result in the dairy exporting 575 truckloads of manure offsite per year. The existing facility has direct access onto Ruble Road which is County maintained. The access onto the project site is large enough to offer emergency access and the size of the parcel is large enough to offer adequate on-site parking opportunities. The project was referred to the Stanislaus County Department of Public Works which has requested conditions of approval to address new driveway approaches, the need for an irrevocable offer of dedication, and the need for a grading, drainage, and sediment management plan.

Mitigation: None.

References: Application information; referral response from the Stanislaus County Department of Public Works dated July 9, 2014; email response from Joe Ramos (F&R Ag Services) dated September 23, 2014; and Stanislaus County General Plan and Support Documentation¹.

XVII. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			x	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			x	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			х	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			x	
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			x	

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?		x	
g) Comply with federal, state, and local statutes and regulations related to solid waste?		х	

Discussion: Limitations on providing services have not been identified. The RWQCB has reviewed this project and has determined that the NMP and WMP are in accordance with the standards outlined in the General Order. The NMP and WMP are the working documents for the dairy and, as such, implementation of such plans are extremely important to minimize the impact of animal waste on surface and groundwater quality. Impacts to the existing utility and service systems are anticipated to be minimal as a result of this project. Less than significant impacts associated with public utility and irrigation easement(s) will be reflected in the project's conditions of approval. Staff has not received any referral responses indicating limitations on providing services.

The project was referred to TID, DER, ERC, and RWQCB. Referral responses from responding agencies will be incorportaed into the project's Conditions of Approval. TID is the irrigation and electric service provider for this project site. TID submitted general comments regarding the need to protect existing irrigation facilities as well as compliance with District requirements. The ERC responded with no comments.

The project site is improved with on-site wells which provide drinking and milk room wash water for the facility. Flush lanes utilized in free-stall barns are washed out with lagoon water. Solid waste (manure) is separated from liquid waste. Liquid waste is stored in lagoons along with wash water. The WMP for this project indicates that the lagoon has sufficient carrying capacity for the increased liquid waste resulting from the proposed expansion. Wastewater will be applied to 180± acres of cropland. Application of wastewater is strictly monitored by the RWQCB to insure that wastewater does not impact the quality of surface water and groundwater. As a result, dairies are required to submit a NMP and WMP to insure the optimal level of lagoon water is used on crop land without it causing impacts to water resources. Prior to the expansion the facility was not required to export any manure offsite. Based on the updated Nutrient Management Plan, increased her size will result in the dairy exporting 575 truckloads of manure offsite per year.

Mitigation: None.

References: Referral response from the Turlock Irrigation District dated July 21, 2014; referral response from the Stanislaus County Environmental Review Committee dated July 28, 2014; referral response from the Regional Water Quality Control Board dated December 8, 2014; K&R Blount Dairy Waste Management Plan and Nutrient Management Plan; and the Stanislaus County General Plan and Support Documentation¹.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation Included	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				x

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	x	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	x	

Discussion: Review of this project has not indicated any features which might significantly impact the environmental quality of the site and/or the surrounding area. The RWQCB reviews all dairies for this region. No indications were given by RWQCB that the project would have a cumulative impact or substantial adverse effects on human beings, either directly or indirectly.

I:\Planning\Staff Reports\UP\2014\UP PLN2014-0065 - K&R Blount Dairy\CEQA-30-Day-Referral\Initial Study.Blount.wpd

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

NEGATIVE DECLARATION

NAME OF PROJECT:	Use Permit Application No. PLN2014-0065 - K&R Blount Dairy
LOCATION OF PROJECT:	724 Ruble Road, on the south side of Ruble Road, north of W. Linwood Avenue, west of Crows Landing Road, in the Crows Landing area. APN: 058-005-014.
PROJECT DEVELOPERS:	K & R Blount Dairy, Kevin Blount P.O. Box 339 Turlock, CA 95381

DESCRIPTION OF PROJECT: This is a request to increase the milk/dry cows by 540 head for a total of 1,240 milk cows, 200 dry cows, and 500 large heifers. There will be an estimated increase of one milk truck trip, one commodity truck trip, and two employee trips per day. The proposed project requires the construction of a 28,000 square foot free-stall barn within an existing corral and a 35,000 square foot free-stall barn northeast of the current footprint. Nutrients produced by the herd are utilized to fertilize 180± acres of irrigated cropland farmed by the applicants.

Based upon the Initial Study, dated <u>May 19, 2014</u>, the Environmental Coordinator finds as follows:

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

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

Initial Study prepared by:	Rachel Wyse, Associate Planner
Submit comments to:	Stanislaus County Planning and Community Development Department 1010 10th Street, Suite 3400 Modesto, California 95354

SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS

PROJECT: USE PERMIT APPLICATION NO. PLN2015-0065 - K&R BLOUNT DAIRY

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STAN CO DERXXXXXXXXXSTAN CO ERCXXXXXXXXXXXSTAN CO FARM BUREAUXXXXXXXXXXXSTAN CO HAZARDOUS MATERIALSXXXXXXXXXXXSTAN CO PUBLIC WORKSXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	STAN CO BUILDING PERMITS DIVISION	Х	Х		Х		Х				Х	Х	
STAN CO ERCXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	STAN CO CEO	Х	Х			Х							
STAN CO FARM BUREAUXXXXXXImage: constraint of the state	STAN CO DER	Х	Х		Х				X		Х		Х
STAN CO HAZARDOUS MATERIALSXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX <td>STAN CO ERC</td> <td>Х</td> <td>Х</td> <td></td> <td>Х</td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td>Х</td> <td></td> <td>Х</td>	STAN CO ERC	Х	Х		Х				X		Х		Х
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STANISLAUS LAFCOXXXXXXSURROUNDING LAND OWNERSXXXImage: Company: AT&TImage: Company: AT	STAN COUNTY COUNSEL	Х	Х			Х							
SURROUNDING LAND OWNERSXXXImage: Company: AT&TXXXXXTELEPHONE COMPANY: AT&TXXXXXImage: Company: AT&TImage: Company: AT&T	STANISLAUS FIRE PREVENTION BUREAU	Х	Х			Х							
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(SB 1462) (5 agencies) X X X X X		Х	Х	X		Х							
		y	v	v		v							
	USDA NRCS	X	X	X		X							