North County Corridor
New State Route 108 Project and Route Adoption

STANISLAUS COUNTY, CALIFORNIA
DISTRICT 10 – STA – 108
(SR-108 [PM 27.5/44.5], SR-219 [PM 3.7/4.8], SR-120 [PM 6.9-11.6])
EA: 10-0S8000 & Project ID: 1000000263
SCH #: 2010082078

Final Environmental Impact Report/ Environmental Impact Statement and Section 4(f) De Minimis Finding

Volume III of III

Volume III includes Appendix N

Prepared by the
State of California Department of Transportation

The environmental review, consultation, and any other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by Caltrans pursuant to 23 U.S.C. 327 and the Memorandum of Understanding dated December 23, 2016 and executed by the Federal Highway Administration (FHWA) and Caltrans.

Caltrans

March 2020

Appendix N Comments and Responses

Pursuant to National Environmental Policy Act and California Environmental Quality Act requirements, the draft NCC EIR/EIS was circulated for public review and comment. The draft environmental document was circulated for a 69-day review by agencies and members of the public from August 9, 2017 to October 16, 2017.

Notices of Availability for the draft environmental document and notice of public hearings were sent to property owners, residents, public agencies, emergency responders, transit agencies, civic and community groups, chambers of commerce, school districts, environmental groups, and other interested parties likely to be interested in the corridor. A total of 4,348 letters were mailed to inform the public of the availability of the draft environmental document.

The Notice of Availability to review the draft environmental document and the invitation to the public hearing were prepared in English and Spanish. Public notices announcing the availability of the draft environmental document included the date, time, and location of the public hearing. The public hearing was advertised in announcements that appeared in the *Modesto Bee,* published on August 9 and September 1, 2017, *Oakdale Leader,* published on August 9 and September 6, 2017, and *Riverbank News,* published on August 9 and September 6, 2017. A public notice in Spanish was also placed in *Vida en El Valle,* on August 9 and September 6, 2017. Notices were also posted with the Stanislaus County Clerk's Office. Availability of the environmental document was also announced in The Federal Register on September 1, 2017. The Notices of Public Hearings were also made available on the Caltrans website

(http://www.dot.ca.gov/d10/x-project-sr108northcountycorridor.html#News).

The draft environmental document was available for public viewing at the following locations:

- Caltrans District 6: 855 M Street, Suite 200, Fresno, CA 93721
- Caltrans District 10: 1976 E Dr. Martin Luther King Jr. Boulevard, Stockton, CA 95205
- Riverbank City Hall, 6707 3rd St, Riverbank, CA 95367
- Oakdale Public Works Department, 455 South 5th Ave, Oakdale, CA 95361
- Modesto City Hall, 1010 10th St, Modesto, CA 95354
- Stanislaus County Public Works Department, 1716 Morgan Rd, Modesto, CA 95358
- Stanislaus County Public Library: 1500 I Street, Modesto, CA 95354
- Riverbank Library: 3442 Santa Fe Street, Riverbank, CA 95367
- David F Bush Oakdale Library: 151 S 1st Ave, Oakdale, CA 95361

- Big Valley Grace Library: 4040 Tully Road, Modesto, CA 95356

The draft environmental document was available on the Caltrans District 10 and Stanislaus County websites at:

- (http://www.dot.ca.gov/dist10/environmental/projects/ncc99to120/index.html and http://www.stancounty.com/publicworks/ncc-main.shtm)

The final environmental document will be made available at these same locations and on the Caltrans District 10 website.

The Project Development Team held a Public Hearing on Thursday, September 7, 2017, for the North County Corridor Project Tully Road to SR-120 (New State Route 108). The Public Hearing was held from 4:00 p.m. to 8:00 p.m. in the Gene Bianchi Community Center in Oakdale, California.

The Public Hearing provided members of the public and other interested parties an opportunity to learn more about what is being planned and to comment on the Draft Environmental Impact Report/Environmental Statement (NCC EIR/EIS) and Draft Section 4(f) De Minimis Finding for the project. Copies of the documents were available at the hearing for review.

The Public Hearing was publicized through a jumbo postcard invitation sent by first-class U.S. mail, public notices (advertisements) in local newspapers, and a news release to print and broadcast mainstream and alternative media that serve the project area.

305 persons were signed in at the Public Hearing and provided a print program for the evening and a comment sheet, and invited to dictate comments, if preferable.

The Public Hearing was conducted in an open house format. Attendees were invited to sign in as they entered the Community Center and were then met by Caltrans, the local North County Corridor Transportation Expressway Authority (NCCTEA), and other engineering and environmental project team specialists who accompanied them through the extensive map displays and other information stations.

Comment sheets were provided and attendees dictated comments to the court reporters.

This appendix contains 160 comments received during the public circulation period of the draft NCC EIR/EIS . These include 128 individual comments, 2 federal agency comments, 2 state agency comments, 4 local agency comments, and 24 public hearing transcript comments. Each comment received during the public circulation period includes a Caltrans response following the comment.

List of Comments Received

A total of 160 comments were received from 152 individuals, 2 federal agencies, 2 state agencies, and 4 local agencies regarding the North County Corridor Project. A summary list of commenters and the dates on which comments were received is detailed below.

Letter from State Clearinghouse

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

October 17, 2017

Juan Torres
California Department of Transportation, District 6
855 M St, Suite 200
Fresno, CA 93721

Subject: North County Corridor New State Route 108 Project and Route Adoption
SCH#: 2010082078

Dear Juan Torres:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 16, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2010082078
Project Title North County Corridor New State Route 108 Project and Route Adoption
Lead Agency Caltrans #6

Type **EIR** Draft EIR
Description Note: Extended Review

Caltrans, in cooperation with the NCC Transportation Expressway Authority, proposes to construct the North County Corridor New SR 108 project. The project area is located in northern Stanislaus County between the intersection of Tully Rd and SR 219 at the western end (SR 219 PM 3.7) and the existing SR 108/SR 120 in East Oakdale at the eastern end (SR 120 PM 11.6). The project area is generally bounded by SR 108/SR 120 on the north, Kiernan Ave/SR 219/Claribel Rd on the south, Tully Rd on the west, and Lancaster Rd on the east. The total length of the project is approx 22 miles.

Lead Agency Contact

Name Juan Torres
Agency California Department of Transportation, District 6
Phone 559-445-6172 **Fax**
email
Address 855 M St, Suite 200
City Fresno **State** CA **Zip** 93721

Project Location

County Stanislaus
City Modesto, Riverbank, Oakdale
Region
Lat / Long 37° 42' 40.7" N / 120° 59' 41.6" W
Cross Streets McHenry Ave/Kiernan Ave to SR 120/Atlas Rd or Lancaster Rd
Parcel No. 910-012-702
Township 3S **Range** 9E **Section** 4 **Base** MDB&M

Proximity to:

Highways Hwy 99, 108, 120
Airports Hawke
Railways Sierra Railroad
Waterways Stanislaus River and Cashman Creek
Schools California Ave ES
Land Use res, comm, ag, urban transition, planned development, and planned industrial

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

Reviewing Agencies Resources Agency; Central Valley Flood Protection Board; Department of Fish and Wildlife, Region 4; Department of Conservation; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 10; Regional Water Quality Control Bd., Region 5 (Fresno); Air Resources Board; Air Resources Board, Transportation Projects; Delta Protection Commission; Delta Stewardship Council; Native American Heritage Commission; Public Utilities Commission

Date Received 08/09/2017 **Start of Review** 08/09/2017 **End of Review** 10/16/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response 1 to State Clearinghouse: Thank you for your comments acknowledging the project's compliance with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act; they have been included in the Final Environmental Document.

Letter from State Clearinghouse: Division of Oil, Gas, and Geothermal Resources, Northern District, Sacramento

DocuSign Envelope ID: 2423FCD8-D261-4D87-87F6-5F77075A46AC

State of California • Natural Resources Agency
Department of Conservation
Division of Oil, Gas, and Geothermal Resources
Northern District – Sacramento
801 K Street • MS 18-05
Sacramento, CA 95814
(916) 322-1110 • FAX (916) 445-3319

Edmund G. Brown Jr., *Governor*
Kenneth A. Harris Jr., *State Oil and Gas Supervisor*

clear 9/7/17
10/16 E
Extended Review

September 7, 2017

Governor's Office of Planning & Research
SEP 07 2017
STATE CLEARINGHOUSE

State Clearinghouse
PO Box 3044
Sacramento, CA 95812-3044

Subject: CEQA project: SCH **#2010082078**
Lead Agency: Caltrans #6
Project Title: North County Corridor New State Route 108 Project and Route Adoption

Ladies/Gentlemen:

The Division of Oil, Gas, and Geothermal Resources (Division) oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. Our regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety. Northern California is known for its rich gas fields. Division staff have reviewed the corridor for the proposed project and no known oil or gas wells were found. The enclosed map shows known wells located near the project area. For future reference you can review wells located on private and public land at the Division's website: https://secure.conservation.ca.gov/WellSearch

If during the course of development of this proposed project any unknown well(s) is discovered, the Division should be notified immediately so that the newly discovered well(s) can be incorporated into the records and investigated. The Division recommends that any wells found in the course of this project and any pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property. This is to ensure that present and future property owners are aware of (1) the wells located on the property, and (2) potentially significant issues associated with any improvements near oil or gas wells.

No well work may be performed on any oil or gas well without written approval from the Division in the form of an appropriate permit. This includes, but is not limited to, mitigating leaking fluids or gas from abandoned wells, modifications to well casings, and/or any other re-abandonment work. (NOTE: the Division regulates the depth of any well below final grade (depth below the surface of the ground). Title 14, Section 1723.5 of the California Code of Regulations states that all well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this grade regulation, a permit from the Division is required before work can start.)

Thank you for the opportunity to comment on this project.

Sincerely,

DocuSigned by:
Charlene L Wardlow
Charlene L Wardlow
Northern District Deputy

Enclosure (1)

1

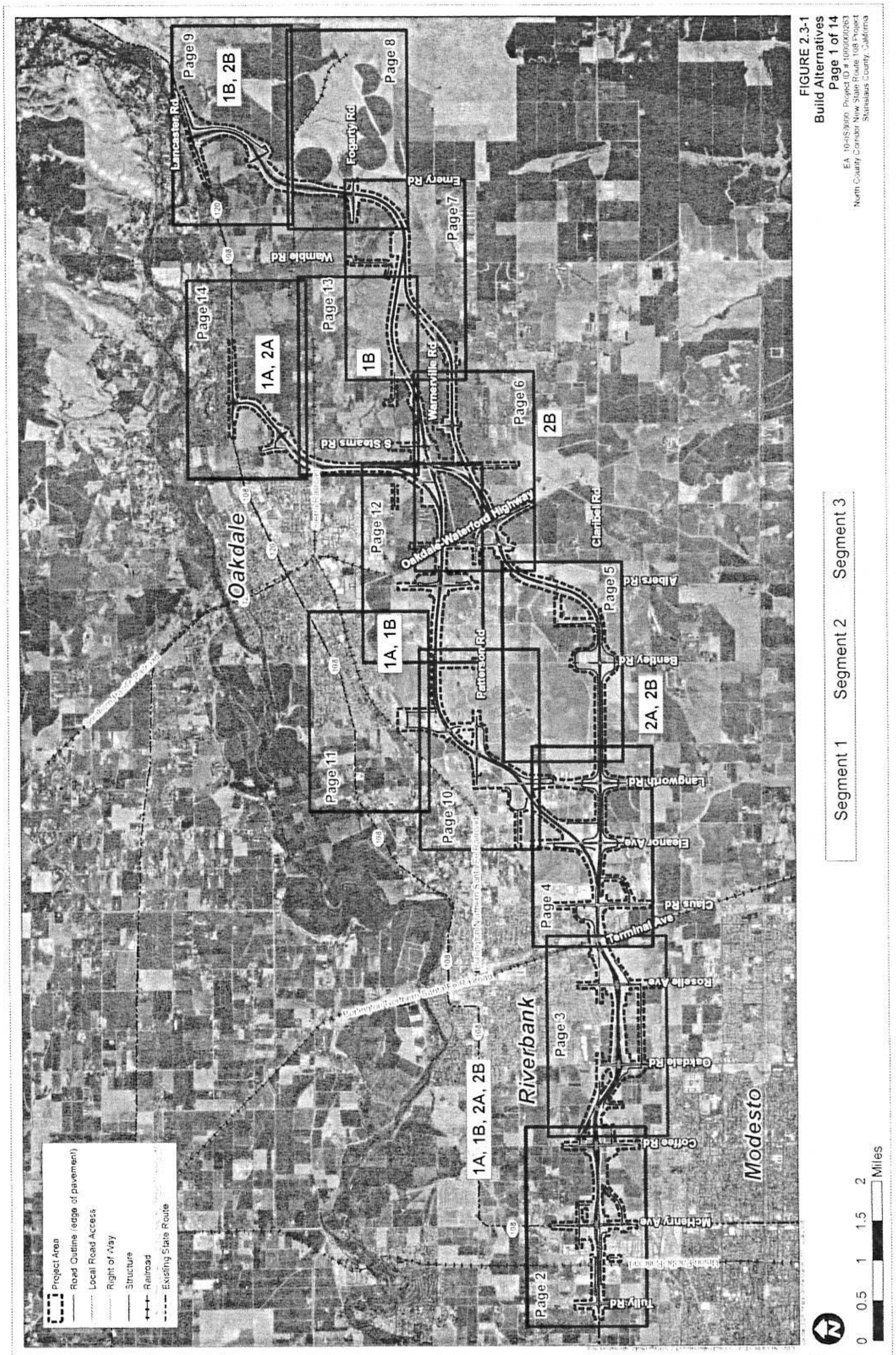
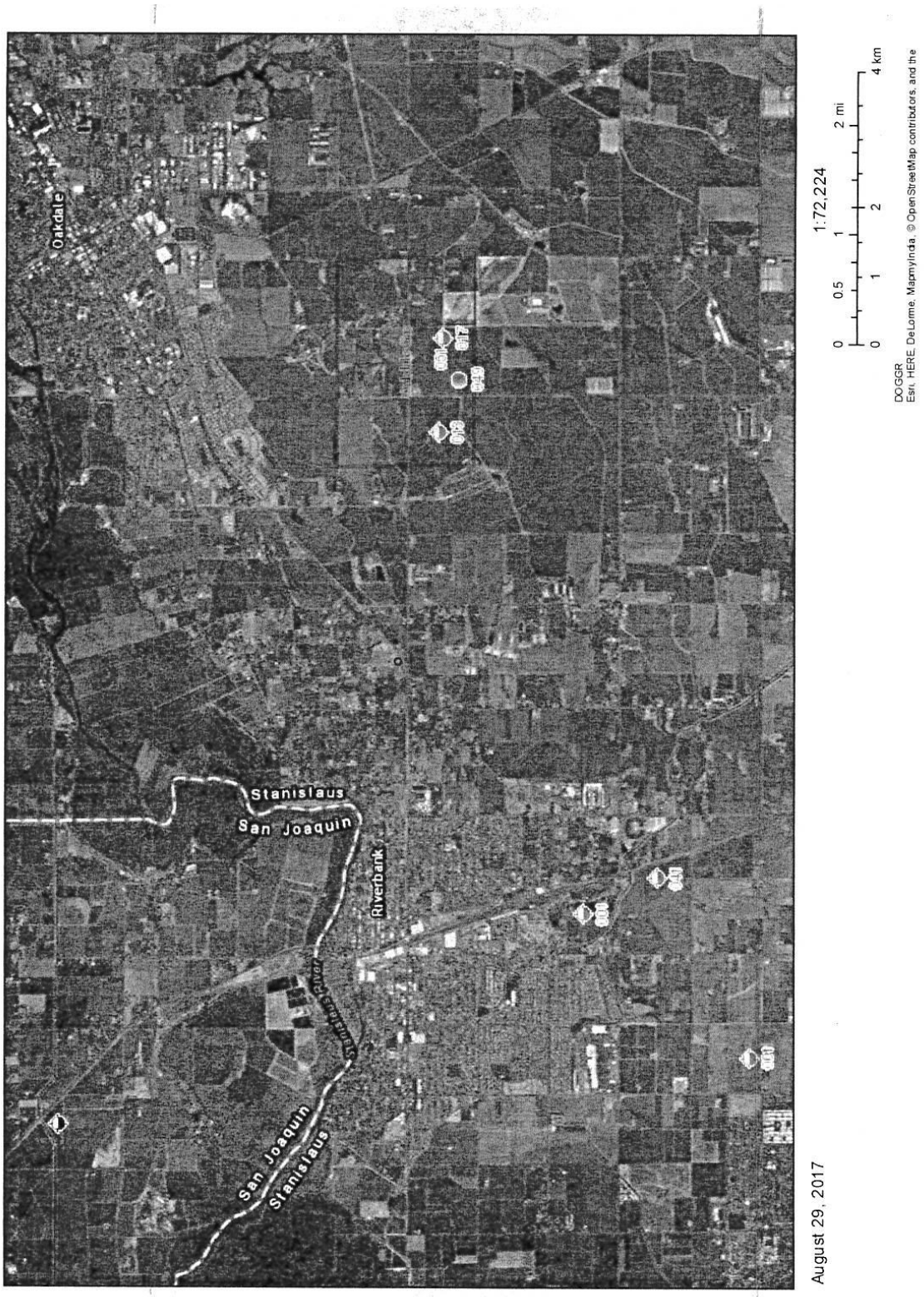


FIGURE 2.3-1
Build Alternatives
Page 1 of 14
Project Area
Road Outline (edge of pavement)
Local Road Access
Right of Way
Structure
Railroad
Existing State Route
Segment 1
Segment 2
Segment 3
Oakdale
Riverbank
Modesto
1A, 1B, 2A, 2B
1A, 1B
1A, 2A
1B, 2B
2A, 2B
1B
2B
Page 2
Page 3
Page 4
Page 5
Page 6
Page 7
Page 8
Page 9
Page 10
Page 11
Page 12
Page 13
Page 14
Tully Rd
McHenry Ave
Coffee Rd
Oakdale Rd
Roselle Ave
Claus Rd
Terminal Ave
Eleanor Ave
Langworth Rd
Bentley Rd
Albers Rd
Claribel Rd
Patterson Rd
Oakdale-Waterford Highway
S Stearns Rd
Warnerville Rd
Wamble Rd
Emery Rd
Fogarty Rd
Lancaster Rd
0 0.5 1 1.5 2 Miles


Project Area
Oakdale
Stanislaus
San Joaquin
Riverbank
Stanislaus River
San Joaquin
Stanislaus
August 29, 2017
0 0.5 1 2 mi
0 1 2 4 km
1:72,224
DOGGR
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the

Response 2 to State Clearinghouse: Division of Oil, Gas, and Geothermal Resources, Northern District, Sacramento: Thank you for your comments and confirming that no known oil or gas wells were found within the project area. If during the course of developments any unknown well(s) are discovered, the Division of Oil, Gas, and Geothermal Resources will be notified. These comments have been included in the Final Environmental Document.

Letter from State Clearinghouse: Central Valley Regional Water Quality Control Board

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Water Boards

Central Valley Regional Water Quality Control Board

Governor's Office of Planning & Research
OCT 17 2017
STATE CLEARINGHOUSE

10 October 2017

Juan Torres
California Department of Transportation, District 6
855 M Street, Suite 200
Fresno, CA 93721

CERTIFIED MAIL
91 7199 9991 7035 8360 4039

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, NORTH COUNTY CORRIDOR NEW STATE ROUTE 108 PROJECT AND ROUTE ADOPTION PROJECT, SCH# 2010082078, STANISLAUS COUNTY

Pursuant to the State Clearinghouse's 11 September 2017 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environment Impact Report* for the North County Corridor New State Route 108 Project and Route Adoption Project, located in Stanislaus 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.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases,

the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues.

For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/.

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Policy is available on page IV-15.01 at:
http://www.waterboards.ca.gov/centralvalleywater_issues/basin_plans/sacsjr.pdf

In part it states:

> *Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.*
>
> *This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.*

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

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.

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits[1]
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.

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 Caltrans Phase I MS4 Permit, visit the State Water Resources Control Board at:
http://www.waterboards.ca.gov/water_issues/programs/stormwater/caltrans.shtml.

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. 2014-0057-DWQ.

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.

[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.

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.

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 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance (i.e., discharge of dredge or fill material) 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.

Waste Discharge Requirements (WDRs)

Discharges to Waters of the State

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 may 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.

Land Disposal of Dredge Material

If the project will involve dredging, Water Quality Certification for the dredging activity and Waste Discharge Requirements for the land disposal may be needed.

Local Agency Oversite

Pursuant to the State Water Board's Onsite Wastewater Treatment Systems Policy (OWTS Policy), the regulation of septic tank and leach field systems may be regulated under the local agency's management program in lieu of WDRs. A county environmental health department may permit septic tank and leach field systems designed for less than 10,000 gpd. For more information on septic system regulations, visit the Central Valley Water Board's website at:
http://www.waterboards.ca.gov/centralvalley/water_issues/owts/sb_owts_policy.pdf

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.

Dewatering Permit
If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Risk General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Risk Waiver) R5-2013-0145. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Risk General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Risk Waiver and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2013-0145_res.pdf

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

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.

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

NPDES Permit

If the proposed project discharges waste that could affect the quality of the waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit.

For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/centralvalley/help/business_help/permit3.shtml

If you have questions regarding these comments, please contact me at (916) 464-4644 or Stephanie.Tadlock@waterboards.ca.gov.

Stephanie Tadlock
Environmental Scientist

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

Response 3 to State Clearinghouse: Central Valley Regional Water Quality Control Board: Thank you for your comments; they have been included in the Final Environmental Document.

Thank you for the regulatory setting, permitting requirement, and water discharge requirement information regarding the proposed project. The comments will be included in the Final Environmental Document, and regulations will be forwarded to the design and construction teams to keep them informed of Central Valley Regional Water Quality Control Board requirements related to discharging and dewatering. While it is anticipated some areas may need to be temporarily dewatered during construction to allow for temporary access, it is not anticipated any permanent discharging or dewatering will result from implementation of the project. Likewise, the property to be acquired for the project will not be used for irrigated agriculture and will only be used for the proposed transportation facility.

Current planning for this project will comply with the antidegradation policy provided in the Basin Plan and will also include compliance with Section 404 and 401 of the Clean Water Act. The project also anticipates preparing a Storm Water Pollution Prevention Plan and General Construction Permit prior to the start of construction. These permits are referenced in Table 2.7-1: Permits and Approvals Needed in Section 2.7 of the NCC Final EIR/EIS.

AGENCY COMMENTS

Comment 1
California Transportation Commission

CALIFORNIA TRANSPORTATION COMMISSION
1120 N STREET, MS-52
SACRAMENTO, CA 95814
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
(916) 654-4245
FAX (916) 653-2134
http://www.catc.ca.gov

November 21, 2017

Mr. Juan Torres
Senior Environmental Planner
California Department of Transportation
855 M Street, Suite 200
Fresno, CA 93721

RE: Draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) De Minimus Finding for the New State Route 108 Project and Route Adoption

The California Transportation Commission (Commission), as a Responsible Agency, received the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) and Section 4(f) De Minimus Finding prepared by the California Department of Transportation (Caltrans) for the New State Route 108 Project and Route Adoption. The project would construct the North County Corridor, New State Route 108 Project, which is currently comprised of four alternatives that would add new controlled-access travel lanes from State Route 219 to State Route 120.

The Commission has no comments with respect to the project purpose and need, the alternatives studied, the impacts evaluated, and the evaluation methods used. The Commission should be notified as soon as the environmental process is finalized since project funds cannot be allocated for project design, right of way or construction until the final environmental document is complete. Once the final environmental process is complete, the Commission will consider the environmental impacts in determining whether to approve the project for future consideration of funding.

Upon completion of the environmental process, please ensure the Commission is notified in writing whether the selected alternative identified in the final environmental document is consistent with the appropriate Regional Transportation Plan. In the absence of such assurance of consistency, the project may be considered inconsistent and Commission staff will base its recommendations to the

Commission on that determination. The Commission may deny funding to a project which is no longer eligible due to scope modifications or other reasons.

If you have any questions, please contact Jose Oseguera, Assistant Deputy Director, at (916) 653-2094.

Sincerely,

Susan Bransen

SUSAN BRANSEN
Executive Director

c: Phil Stolarski, Chief (Division of Environmental Analysis), California Department of Transportation

Response 1 to California Transportation Commission: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. The project conforms with the StanCOG RTP and is reflected in the NCC Final EIR/EIS, chapter 3.2.5, Air Quality. The California Transportation Commission will be notified when the FED is complete

Comment 2
Comment from the U.S. Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

OCT 16 2017

Mr. Juan Torres
Senior Environmental Planner
California Department of Transportation
855 M Street, Suite 200
Fresno, California 93721

Subject: Draft Environmental Impact Statement for the North County Corridor New State Route 108 Project and Route Adoption, Stanislaus County, California (EIS No. 20170168)

Dear Mr. Torres:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. EPA provided scoping comments and accepted participating agency status on this project, pursuant to 23 U.S.C. Section 139, through a letter to the California Department of Transportation (Caltrans) on September 30th, 2010.

Following our review of the Draft EIS, EPA has rated all the alternatives being considered for the new proposed state route as *Lack of Objections* (LO). Please see the enclosed *Summary of EPA Rating Definitions*. EPA commends Caltrans for providing multiple early coordination opportunities in advance of publishing the Draft EIS. Our agency appreciated being able to offer early feedback regarding potential environmental impacts from this project. We understand that as a result of these pre-Draft EIS coordination efforts, Alternatives 1A and 1B were added for further consideration and potential impacts to waters of the United States were reduced to fewer than 5 acres for each build alternative being considered.

Relinquishment of Existing State Route 108
We understand that Caltrans plans to relinquish the existing SR-108 to local jurisdictions in its current form. The Draft EIS addresses growth-related indirect impacts by referencing local policies and goals in Tables 3.1.1.2-1 through 3.1.1.2-5. Stanislaus County, City of Riverbank, and City of Oakdale intend to avoid potential impacts associated with induced growth by focusing development and adding bicycle and pedestrian facilities on the new route. We also recommend that Caltrans disclose in the Final EIS any reasonably foreseeable projects and mitigation measures, not otherwise disclosed in Table 3.6-1, that local jurisdictions have planned for the existing SR-108 after relinquishment. The Final EIS and Record of Decision for this project represent an appropriate forum to identify potential mitigation measures to minimize an increase in overall vehicles miles traveled that might occur with both facilities operational. 2A

EPA appreciates the opportunity to review this Draft EIS. We recommend Caltrans continue to coordinate with EPA and US Army Corps through the selection of a preferred alternative, the 2B

completion of a final delineation of waters of the United States, and the application for Individual 404 Permit if required. When the Final EIS is released for public review, please send one copy to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 947-4161, or contact Zac Appleton, the lead reviewer for this project, at 415-972-3321 or appleton.zac@epa.gov.

2B

Sincerely,

Connell Dunning

Connell Dunning
Transportation Team Supervisor
Environmental Review Section

Enclosures: Summary of EPA Rating Definitions

cc: Philip Vallejo, Caltrans
Michelle Ray, Caltrans
Brenda Powell-Jones, Caltrans
Will Ness, US Army Corps, Sacramento District

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment

Response 2 to U.S. Environmental Protection Agency: Thank you for your comments; they have been included in the Final Environmental Document.

Response 2A: Chapter 3 details the impacts of the proposed project and the mitigation measures, if and when necessary.

Table 3.6-1 “Future Projects” for Stanislaus County in Section 3.6 (Cumulative Impacts) of the NCC Final EIR/EIS has been updated to include additional local projects approved to date (see Table 3.6-1: Future Projects in NCC Final EIR/EIS).

As shown in Table 3.1.6-7, the overall amount of daily travel (reflected in vehicle miles travelled) will be slightly less under with-project conditions when compared to no-build conditions for all analysis years. As these results show, any project alternative would have positive region-wide impacts in reducing travel times and delays caused by congestion. In a comparison for the no-build scenario, all four project alternatives would either improve or maintain at least LOS D operations along the urban street study segments, maintain or improve the LOS reported for each two-lane highway study segment, and result in the planned North County Corridor freeway/expressway operating at LOS C or better during morning and evening peak hours for each project alternative.

Response 2B: A 404 permit for filling or degrading waters of the United States will be submitted during final design.

A copy of the FED will be mailed to the address provided within this letter.

Comment 3
Comment from San Francisco Water Power Sewer

From: Torres, Juan@DOT [mailto:juan.torres@dot.ca.gov]
Sent: Wednesday, January 15, 2014 12:58 PM
To: Frye, Karen
Cc: Smith, Scott S@DOT
Subject: FW: North County Corridor EIR/EIS update

Good afternoon Mrs. Frye. My name is Juan Torres and I am an Associate Environmental Planner with Caltrans District 6 who is currently working with Scott Smith on the North County Corridor project. You are correct, Mr. Smith has taken over the duties held by Gail Miller on the project. Mrs. Miller accepted a promotion within the District. Mr. Smith is her replacement and will be serving as the Caltrans Environmental Oversight lead and is my immediate supervisor. I will be acting as the Caltrans Environmental oversight review coordinator.

The North County Corridor Transportation Expressway Authority (Authority) has initiated the preparation of the EIR/EIS thus the request for property access. The ground work for the various technical studies to be prepared is currently being processed. The Authority has acquired a new consulting team to assist them in the preparation of the draft environmental document. The project development team has been transitioning the project to the new team members. The Authority has made some enhancements to the project alternatives and is in the process of finalizing the project description. It is the teams' intent to update the 6002 Agency members once the project description has been finalized. You should expect to see an invitation from a Matt Satow in the near future related to future 6002 review meetings and project information updates. Matt Satow, of Drake Haglen & Associates, is serving as the Project Manager and Principal Engineer on the project and will be coordinating all future meetings. If you should have any questions or need for additional information, feel free to contact myself or Scott Smith. We will make sure the inquiries are relayed to the appropriate individuals.

From: Frye, Karen [mailto:KFrye@sfwater.org]
Sent: Thursday, September 28, 2017 12:48 PM
To: Torres, Juan@DOT <juan.torres@dot.ca.gov>
Subject: RE: North County Corridor EIR/EIS update

Hello Mr. Torres, I received a notice that the North County Corridor Draft EIR/EIS public comment period has been extended (we did not receive a notice when it was published) and we are reviewing the document now.

I saw the following reference in the EIR/EIS:

Utilities and emergency services have been analyzed as part of the *Community Impact Assessment*

(February 2016) for the North County Corridor project.

Can this document be provided? I don't see it as an Appendix. Thank you.

Karen E. Frye, AICP
San Francisco Water, Power and Sewer | Services of the San Francisco Public Utilities Commission
Bureau of Environmental Management
525 Golden Gate Avenue, 6th Floor
San Francisco, CA 94102
415-554-1652 (office)
415-694-1227 (cell)

3A

Hi Karen,

Please find an electronic copy of the Community Impact Assessment for the North County Corridor project for download and reference at the link below:

https://zendto.dokkenengineering.com/pickup.php?claimID=7sJDe3o77mJiYBx7&claimPasscode=K63otWSk5YsTiPC3

Please let me know if you would like a hardcopy mailed to your office, which I would be happy to provide to you.

Thank you very much!

Zach Liptak
Associate Environmental Planner
DOKKEN ENGINEERING
110 Blue Ravine Road, Suite 200, Folsom, CA 95630
Phone: (916) 858-0642 - Fax: (916) 858-0643

3A

San Francisco Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

Bureau of Environmental Management
525 Golden Gate Avenue, 6th Floor
San Francisco, CA 94102
T 415.934.5700
F 415.934.5750
TTY 415.554.3488

October 16, 2017

Juan Torres, Senior Environmental Planner
California Department of Transportation (Caltrans)
855 M Street, Suite 200
Fresno, CA 93721

Via Email: juan.torres@dot.ca.gov

Re: SFPUC Comments on the Caltrans North County Corridor (NCC) New State Route 108 Project and Route Adoption Draft EIR/EIS

Dear Mr. Torres,

The San Francisco Public Utilities Commission (SFPUC), as a cooperating and participating agency pursuant to Section 6002 of SAFETEA-LU, is submitting the following comments on the Caltrans NCC Draft EIR/EIS. The SFPUC received notice on September 18th of the extension of the Draft EIR/EIS public comment period to October 16, 2017. SFPUC did not receive notice of the publication of the Draft EIR/EIS and has therefore had limited time to review the document. The SFPUC's comments are organized as follows:

1) The SFPUC prefers Alternative 2B because it has the least impact on the HHWP facilities. However, depending on the nature of the crossings and impacts to SFPUC facilities, Alternative 2A may be an acceptable alternative.

2) A detailed analysis of impacts of the project on utilities and specifically on the SFPUC Hetch Hetchy Water and Power (HHWP) facilities is needed. Without a detailed analysis of utility impacts, the project description and environmental analysis are incomplete because the EIR/EIS does not include all of the construction activities that are necessary to protect and provided continued access to HHWP facilities that will be affected by the project.

3) The analysis and conclusions regarding historic resources for SFPUC properties are problematic and do not take into account previous evaluations of some of SFPUC properties in the APE.

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4) Based on state and federal regulatory requirements for transmission line clearance and past engineering practice involving freeway crossings of SFPUC pipelines, the SFPUC has strict requirements for (a) minimum clearance under its high-voltage power transmission lines and around its transmission towers, and (b) protection of its high-pressure water transmission pipelines. The SFPUC also requires permanent and unrestricted access to property where access is severed as a result of freeway construction in order to ensure timely completion of both routine and emergency maintenance and repair of its infrastructure. Caltrans must consider these requirements when preparing the engineered design for all NCC crossings.

The SFPUC operates and maintains two high-voltage power transmission lines (power lines) and three large-diameter high-pressure water transmission pipelines (pipelines) as part of a regional water system supplying 2.6 million customers in the San Francisco Bay Area. The power lines and pipelines run over, under, and along property owned in fee by the City and County of San Francisco under the SFPUC's jurisdiction (SFPUC Property). Additionally, the SFPUC has ingress and egress rights through lands adjacent to the SFPUC property in order to operate and maintain its facilities efficiently and safely. All alignments proposed and studied in the Draft EIR/EIS cross SFPUC property at multiple locations.

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<u>Caltrans Programmatic Route Adoption EIR/EIS (2010)</u>
On November 5, 2009, the SFPUC sent a comment letter to Caltrans on the North County Corridor State Route 108 East Route Adoption Project Draft EIR/EIS (SCH No. 2008201069). The SFPUC identified Corridor B as having significantly greater adverse impact on HHWP facilities than Corridor A. The Final EIR, which was approved by Caltrans in April 2010, responded to the SFPUC comment letter and identified Alternative Corridor B as the Preferred Alternative, contrary to the SFPUC comments, due to project benefits (reduced travel times, improved access, etc.) and fewer environmental impacts. Alternative Corridor B is the northernmost route, and is carried forward in the 2017 Project Draft EIR/EIS as Alternatives 1A and 1B.

The 2010 Final Program EIR stated that "This is a program-level EIR for route adoption…. Any future build projects would require additional coordination with the San Francisco Public Utilities Commission to minimize impacts to the Hetch Hetchy Water and Power right-of-way…. The impacts of any future build projects on utilities would be examined as part of a project-specific EIR. Caltrans is committed to incorporating avoidance and minimization measures

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to reduce impacts to utilities (such as Hetch Hetchy Water and Power) including establishing buffer zones capable of accommodating maintenance access and future planned improvements to the Hetch Hetchy Water and Power system. While complete avoidance may not be feasible, outright utility relocations are cost prohibitive. Therefore, Caltrans will coordinate with the appropriate agencies regarding impacts to utilities and will be responsible for any costs associated with those impacts".

The 2010 Final Program EIR states in Appendix D, Minimization and/or Mitigation Summary, page D-2: "Selection of a new State Route 108 alignment shall consider the least invasive alignment with respect to minimizing crossings of existing canals and utility corridors, where appropriate." The SFPUC finds that a detailed evaluation of impacts on SFPUC facilities is not included in the Project level Draft EIR/EIS available for public review now.

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<u>Cooperating and Participating Agency Coordination</u>
In November 2010, the SFPUC was invited by Caltrans to participate as a Cooperating and Participating Agency, pursuant to Section 6002 of SAFETEA-LU and the SFPUC accepted. On April 19, 2011 SFPUC provided comments on the 6002 Coordination Plan, the Purpose and Need Development Memo and the Alternatives Screening Methodology Report. SFPUC also provided two SFPUC CEQA documents for unrelated SFPUC projects that overlap the NCC project area: the San Joaquin Pipeline System Project Final EIR (2009) and the Rehabilitation of the Existing San Joaquin Pipelines Mitigated Negative Declaration (2010), which included information on many resources within the project area including historic resources. SFPUC attended NCC coordination meetings from 2010 through 2014. No further coordination meetings were held or correspondence received from September 2014 through September 2017.

The SFPUC reviewed the four alternative alignments (Alternatives 1A, 1B, 2A, and 2B) provided by Caltrans in September 2014 and sent the following analysis to Caltrans in October 2014 containing the number of SFPUC utility crossings for each alternative alignment:

- Alignment 1A
  - Number of Crossings (includes major and minor crossings): 12
  - Number of impacted Valve Boxes: 8
  - Other concerns: Albers Road Valve House, Tower 539S
- Alignment 1B
  - Number of Crossings (includes major and minor crossings): 12
  - Number of impacted Valve Boxes: 8
  - Other concerns: Albers Road Valve House, Tower 539S

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- Alignment 2A
  - Number of Crossings (includes major and minor crossings): 6
  - Number of impacted Valve Boxes: 3
- Alignment 2B
  - Number of Crossings (includes major and minor crossings): 4
  - Number of impacted Valve Boxes: 3

With the limited information available at that time, the SFPUC identified alignment 2B as its preferred alignment, having the least impact to the HHWP system.

Caltrans New State Route 108 Project and Route Adoption EIR/EIS (2017)
The project specific Draft EIR/EIS (SCH No. 201082078) was published in August 2017 and evaluates the same Alternatives 1A, 1B, 2A and 2B (with some minor adjustments and realignments). The preferred alternative will be identified in the Final EIR/EIS.

The Draft EIR/EIS identifies the following impacts in Table 2.4-1:

Potential Impact	Alt 1A	Alt 1B	Alt 2A	Alt 2B
Number of Hetch-Hetchy Crossings	12	12	6	5

Based on this limited information, it appears that Alternative 2B continues to have the fewest impacts on SFPUC facilities. However, depending on the nature of the crossings and impacts to SFPUC facilities, Alternative 2A may be an acceptable alternative. Alternatives 1A and 1B clearly have the greatest number of impacts to SFPUC facilities and will require extensive and expensive mitigative actions by Caltrans should one of those alignments be selected as the Preferred Alternative in the Final EIR/EIS.

For example, based on cursory analysis, it appears that 14 SFPUC transmission towers are within 100 feet of the Alternative 1A alignment. If NCC crossing facilities intersect with the SFPUC ROW along the transmission line, they will have to meet minimum clearance requirements that meet or exceed CPUC GO-95 requirements. To meet these clearance requirements, Caltrans will be required to mitigate any clearance deficiency at their expense; mitigations may include construction of an interset tower, raising a transmission tower in height, reconductoring full spans of the transmission line, or other combination of actions. Caltrans may determine that some of the proposed

3G

alignments (1A and 1B) are cost-prohibitive due to these required clearance mitigations. Additionally, the environmental impacts of these mitigations should be analyzed as part of the Draft EIR/EIS.

Similarly, any NCC crossings that transect the pipeline and appurtenant infrastructure will require an encasement or bridge design. These encasements or bridge designs may be needed for the entire SFPUC property width to accommodate potential future SFPUC infrastructure. Where NCC crossings sever access roads used by the SFPUC for maintenance and operation of its facilities, new access roads may be required; these additional encasements, bridges, and access roads should be analyzed as part of the Draft EIR/EIS.

When maintaining its pipelines, the SFPUC must have the capability to drain drinking water from valves along the pipeline, so any proposed relocation of valve boxes must include a consideration of the engineering requirements to discharge water for maintenance purposes without creating nuisance conditions. as well as maintenance of a viable drainage outlet. Additionally, as a gravity-based water transmission system, relocating valve boxes along the SJPL will likely result in engineering and operational challenges that are expensive to mitigate. If pumping would be required, there are energy/ greenhouse gas impacts that would need to be addressed.

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Recreational Use

The Draft EIR/EIS states (on pg. ii) "the proposed project includes the following:… vehicular, bicycle, and pedestrian access…" and that "Pedestrian and bicycle facilities would be improved" (Summary table). Figure 3.1.6-4 in Appendix A shows a proposed Class II bike facility on portions of all four alignments including portions that cross SFPUC property. Caltrans should specify the locations and types of bicycle and pedestrian access so SFPUC can determine if there are any conflicts with SFPUC policies and infrastructure. In particular, if the pedestrian and bicycle access will be considered a separate trail and considered a recreational use on our property, Caltrans will need to agree to satisfy or implement any mitigation measures that may arise in the future from CEQA analysis related to any interruption or disruption of the recreational use on our property from any SFPUC maintenance or projects on our property.

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Utilities

The Draft EIR/EIS summary table on page iii states that utilities, including SFPUC facilities, would be relocated for all alternatives. However page 17 states that "The Build Alternatives would require relocation of existing utilities,

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but relocation of the Hetch-Hetchy electric transmission lines, Hetch-Hetchy underground pipelines, and main canals would not be required." The summary table should be revised to clarify that the SFPUC pipelines and power lines will not be relocated, but access to some valve boxes and access roads may be severed; potentially requiring construction of new access roads and relocation of valve boxes or other appurtenant infrastructure. Additionally, it appears likely that construction of additional infrastructure such as transmission and interset towers may be required for some NCC crossings. The environmental impacts of such construction are not included in the Draft EIR/EIS, nor are the impacts caused by relocating utilities. 3I

The Draft EIR/EIS states that "the North County Corridor and the access road are expected to clear the pipeline and transmission towers, and all crossings are at grade over the water pipeline and under the power transmission lines." SFPUC requests that Caltrans clarify the methodology it used to make this conclusion and provide this analysis.

Section 3.1.5, Utilities and Emergency Services, includes information on utilities including the HHWP facilities. Page 134 states "Utilities and emergency services have been analyzed as part of the Community Impact Assessment (February 2016) for the North County Corridor project." SFPUC reviewed that report but a detailed analysis of utility crossings and potential impacts is not provided. Section 4.3.2.3 includes one paragraph on impacts to all utilities.

Chapter 2, Table 2.4-1 Comparison of Alternatives provides a summary of impacts for each alternative such as acres of wetlands and habitat impacted, project cost, number of interchanges, etc. This table also provides the number of utility crossings (including SFPUC facilities). However, there is not sufficient detail of the extent of the potential conflict with utilities to appropriately inform the public or the decision-makers. It is not just the number of crossings that determines the potential impact. Other information such as the acreage of the affected crossings, interruption of access to facilities (from the highway running parallel to our facilities), disruption of operations (such as limiting water discharges), number of valve boxes or access roads that need to be relocated, and conflicts with existing facilities such as power transmission towers and manholes must be considered to provide the full analysis of impacts. 3I

For example:

- Valve boxes may contain access manholes, blow off valves/air relief valves, or air vacuum valves.
- Further engineering review is required to determine the proposed clearance under and around the power lines.

- If an alignment passes between two transmission towers, a review of the proposed clearance will determine if there are additional impacts.
- When the road alignment parallels the SFPUC property, it restricts the SFPUC's ability to access its facilities for repair and maintenance. Access roads currently used for these purposes may no longer be available to us.
- When a road alignment crosses the SFPUC property, it puts a heavier load than anticipated on the pipelines and requires substantial remedial mitigative action in order to protect and keep the pipelines functional.

The Draft EIR/EIS states that "The North County Corridor and the access roads are expected to clear the pipeline and transmission towers, and all crossings are at grade over the water pipeline and under the power transmission lines." However, the Draft EIR/EIS does not provide a detailed analysis of impacts to utilities. A more thorough analysis must be conducted that identifies specific facilities that would need to be relocated (valve boxes, manholes, blow off valves, etc.), access roads that would be relocated, area of disturbance for each crossing, major and minor crossings, upgrades that would be needed to protect the San Joaquin pipelines, and analysis of the transmission line clearances. 3I

Only one mitigation measure is provided, Measure UTL/ES-1, which is to send coordination letters to all impacted utility companies to minimize service interruptions. The analysis is incomplete to determine if this is sufficient.

Historic Resources

Section 3.1.8, Cultural Resources, identifies three built environment resources assumed eligible for the National Register of Historic Places and California Register of Historical Resources: the Hetch-Hetchy Aqueduct, Moccasin-Newark Transmission Tower Line and the associated Warnerville Substation (Figure 3.1.8-1, Map Reference 6) as one historic resource.

The SFPUC facilities are "assumed eligible per VIII.C.4 of the Section 106 Programmatic Agreement **for the purposes of this project** (emphasis added); for inclusion in the National Register of Historic Places and California Register of Historical Resources as part of a larger potential historic district which includes the Hetch-Hetchy dam, aqueduct, electrical transmission towers and substations, and associated work camps". 3J

The analysis and conclusions regarding cultural resources for SFPUC properties are problematic and do not take into account previous evaluations of 3l

some of SFPUC properties in the APE. The SFPUC properties should not be assumed to be eligible for inclusion in the NRHP/CRHP, particularly as part of some larger potential, yet undefined, historic district that could encompass a portion of the SFPUC's system, described as including "the Hetch Hetchy dam, aqueduct, electrical transmission towers and substations, and associated work camps" with no identified potential period of significance. An assumption of eligibility of this scale should only be undertaken when there is a lack of previous documentation on which a conclusion based on sufficient evidence can be based. This is not the case for the SFPUC resources.

Issues related to historic districts have been addressed repeatedly in various SFPUC environmental documents. The SFPUC's Water System Improvement Program Programmatic Environmental Impact Report (WSIP PEIR) (2008), for example, included a thorough historic context of the SFPUC water system and did not identify the potential for a large historic district encompassing wide swaths of the SFPUC system. Rather, the WSIP PEIR concluded that there may be distinct areas within sections of the SFPUC system that could constitute historic districts. In addition, the SFPUC had a study prepared by JRP Historical Consulting, LLC in 2008 to further examine the issue of historic districts that could be impacted by WSIP projects. The JRP study concluded that there is no overall historic district within the SFPUC system related to the development of the Hetch Hetchy water system. The SFPUC is not aware of any other studies that have drawn conclusions regarding a potential historic district that includes the SFPUC facilities in the APE. No study supporting such a conclusion was cited in the Historical Resources Evaluation Report (HRER). 3J

The SFPUC previously provided the SFPUC San Joaquin Pipeline System Project Final EIR to Caltrans. That EIR identified that San Joaquin Pipelines (SJPLs) No. 1 and No. 2 appear to be eligible for the National Register and the California Register of Historical Resources but that overall, the SJPL System and its associated structures (including SJPLs No. 1 through No. 3, the Oakdale Portal Facility, the Tesla Portal Facility, the Albers Road Valve House, the Cashman Creek Valve House, the San Joaquin Valve House, and the Warnerville Substation) do not appear to be eligible for the National Register and the California Register as an historic district. The SJPL System EIR also determined the Warnerville Substation did not appear to be eligible for the National Register and the California Register due to lack of historic significance, and also did not appear in combination with other facilities to be eligible as an historic district.

Although the DPR 523 form for the SJPL No. 1 and 2 was cited once in the HRER (Schultz and Vanderslice) for specific historic information, the SJPL

System EIR does not appear to be among the references used by Caltrans and their consultant LSA to prepare the HRER. Furthermore, SFPUC was not contacted regarding other potentially relevant historic resources studies. Please review the information provided by the SFPUC in the SJPL System EIR and revise the cultural resources analysis/historic resource evaluation to be consistent with previous evaluations.

Furthermore, similar infrastructure owned by PG&E, MID, and TID was evaluated as part of the preparation of the Draft EIR/EIS and was found—without exception—to be ineligible. Transmission lines and towers owned by PG&E, MID, and TID and those owned by the SFPUC were constructed during a similar time period, using similar materials and workmanship, and have all been maintained and upgraded consistent with modern standards. It is possible that even if the Moccasin-Newark Transmission Tower Line has historic significance, it may lack sufficient historic integrity because of various changes and upgrades made to the facility over time. PG&E, MID, and TID transmission infrastructure was evaluated and determined not to be significant resources under CEQA. The OHP status code for those facilities is 6Z, ineligible due to survey evaluation. Given the similarities of SFPUC transmission infrastructure, it is unlikely that the Moccasin-Newark Transmission Tower Line would be eligible under Criteria A, B, or C. 3J

The text on page 226 of the EIR should be corrected to reflect that Alternative 2B will cross the Hetch Hetchy facilities 5 times (as shown in Table 2.4-1) and require the relocation of three valve boxes. Figure 3.1.8-1, Area of Potential Effects, shows the Hetch Hetchy Aqueduct as an eligible resource, but the Warnerville Substation and Moccasin-Newark Transmission Tower Line are not specifically identified. 3K

Figure 2 in Appendix C, Section 4(f) Evaluation shows an overview of the Hetch Hetchy Aqueduct/Moccasin-Newark Transmission Line and the legend references Map Reference #133. Should the map reference instead be to MR 6 as shown in Figure 3.1.8-1? Figure 6 (5 parts) in Appendix C shows an aerial map of the project alignment and the Hetch Hetchy Aqueduct/Moccasin-Newark Transmission Line. Appendix C has an Attachment A: Records and Correspondence, but the correspondence is missing. 3L

<u>SFPUC Project Review Process and Real Estate Authorization</u>
Projects and activities proposed on SFPUC ROW lands must be reviewed by our Project Review Committee (Committee). The Committee is comprised of staff from the Natural Resources and Lands Management Division (NRLMD), Bureau of Environmental Management (BEM), HHWP, Real Estate Services 3M

(RES) and the City Attorney's Office. This multi-disciplinary team reviews projects and activities for consistency with our Environmental Stewardship Policy, Real Estate Guidelines, Vegetation Management and other land use policies, best management practices, and completion of the CEQA review and applicable environmental permitting processes. In reviewing the proposed project, the Committee may indicate that modifications or avoidance and minimization measures are necessary. Therefore, it is important to schedule projects for review at the earliest opportunity.

3M

A completed Project Review Application (link to the Project Review application at http://sfwater.org/modules/showdocument.aspx?documentid=2240) must be submitted to the SFPUC contact person listed in the "Application Instructions" detailed on page 1 of the application.

For each NCC crossing (each alignment has multiple crossings), the Committee requires detailed engineered design drawings prior to any construction. With the shared alignment of the power lines and pipelines, it is crucial to maintain minimum coverage over the pipelines and minimum ground and structure clearance to the transmission towers and power lines. The following areas of concern must be considered when preparing the engineered design for the NCC crossings:

1. Transmission line clearances
   All crossing locations must maintain minimum clearances to meet or exceed CPUC GO-95 requirements. SFPUC can provide plan and profile drawings for final route. Any crossings that propose infrastructure that could be in conflict with these requirements will require mitigative actions, including, but not limited to, transmission tower raises, reconductoring of transmission lines, or construction and installation of interset poles.

2. Pipeline operation and protection
   a. Operation
      i. Blow-offs, water discharges, valve boxes
   b. Protection
      i. All crossings will require an encasement or bridge design
      ii. Prior to any encasement or bridge, and during project construction, a condition assessment and repairof the pipelines and coatings will be required

3. Access to infrastructure

3N

> In areas where access to SFPUC infrastructure is compromised or severed by project construction, Caltrans must negotiate and secure permanent access for the SFPUC for operation and maintenance of its facilities and any other rights the SFPUC currently exercises for the operation and maintenance of its facilities.

3N

As part of the Project Review process, Caltrans will work with SFPUC Real Estate Services staff to obtain the appropriate real estate agreement(s) necessary to construct the project and operate and maintain the NCC over and across SFPUC property. The SFPUC will not authorize any work on SFPUC lands without an executed real estate agreement.

Conclusion and Recommendation

The SFPUC continues to maintain its preferred alignment as Alternative 2B, as this alignment has the least impact on the Hetch Hetchy facilities, although depending on the nature of the crossings and impacts to SFPUC facilities, Alternative 2A may be acceptable.

The SFPUC requests that the NCC project team submit a Project Review application identifying the final alignment and preliminary design plans to the SFPUC as Project Review Committee as soon as the final alignment is identified, as it will take several months to complete the Project Review process and for the NCC project team to acquire the necessary real estate authorization.

The SFPUC recommends a meeting between the SFPUC and Caltrans to discuss these comments regarding the Draft EIR/EIS and the SFPUC Project Review process. We will provide more detailed comments and information on potential impacts to our facilities at that time. In order to arrange this meeting please contact me at 415-554-1652 or via email at KFrye@sfwater.org.

3O

Sincerely,

Karen Frye

Karen Frye, AICP
Senior Environmental Project Manager

cc: Steve Ritchie, SFPUC, Water Enterprise
Irina Torrey, SFPUC, BEM
Margaret Hannaford, SFPUC, HHWP
Rosanna Russell, SFPUC, Real Estate Services
Francesca Gessner, SFPUC General Counsel

Response 3 to San Francisco Water Power Sewer: Thank you for your comments; they have been included in the Final Environmental Document.

Response 3A: Caltrans apologizes for the late notification of the circulation of the draft NCC EIR/EIS. An email was received on September 28, 2017 from the San Francisco Public Utilities Commission requesting a copy of the NCC Community Impact Assessment. The document was sent later that day.

Response 3B: The San Francisco Public Utilities Commission's preference for Alternative 2B and 2A has been noted; however, Caltrans and the Project Development Team have determined that Alternative 1B is the preferred alternative. See Section 2.5 of the NCC Final EIR/EIS for further information regarding this decision.

Response 3C: Temporary disruptions may occur to the San Francisco Public Utilities Commission Hetch Hetchy Water and Power facilities as part of proposed project activities; however, access will be maintained during construction. It is anticipated the project will require relocation of approximately eight valve boxes associated with the San Francisco Public Utilities Commission Hetch Hetchy. Consultation with the San Francisco Public Utilities Commission to determine the location of these relocated valve boxes will occur during final design.

Access and clearance of utilities were taken into consideration for the proposed project and have been designed in accordance with Caltrans standards. Additional information can be found in Section 3.1.5 of the NCC Final EIR/EIS.

Any potential utility conflicts will be resolved during the right-of-way phase of the proposed project; continued utility coordination attempts will be resolved with the owner at that time.

Coordination during the right-of-way phase will ensure pedestrian and bicycle facilities within San Francisco Public Utilities Commission parcels will abide by San Francisco Public Utilities Commission regulations.

Response 3D: The Hetch Hetchy Aqueduct, Moccasin-Newark Transmission Line, and Warnerville Substation within the Area of Potential Effects are assumed eligible for the National Register, for the purposes of this project only, as part of a larger potential historic district that includes the Hetch Hetchy dam, aqueduct, electrical transmission towers and substations, and associated work camps. The potential historic district is assumed eligible under Criteria A and C, at the state level of significance, for its association as instrumental in the growth of San Francisco, and for innovative engineering techniques. Within the Area of Potential Effects, the Hetch Hetchy aqueduct and transmission line share a resource boundary that includes an approximately 200-foot right-of-way; the Warnerville Substation resource boundary is the Area of Potential Effects limits. Character-defining features of the resources include the metal lattice transmission towers with cross arms, and the substation building.

Assumption of eligibility is a temporary eligibility consideration only given to a resource during the environmental analysis period if it is believed that project will not impact the resource. State Historic Preservation Officer concurrence on assumption of eligibility considerations is different than State Historic Preservation Officer concurrence on formal eligibility evaluations. For formal eligibility evaluations, State Historic Preservation Officer will provide concurrence on whether the resource is eligible for the National Register of Historic Places/California Register of

Historical Resources. For temporary assumption of eligibility considerations, State Historic Preservation Officer provides concurrence not on the eligibility determination, but on a project's presumed impacts. It merely means that the SHPO is concurring on the project would not adversely/significantly impact the resource, *assuming* it is eligible for the National Register of Historic Places/California Register of Historical Resources. This temporary eligibility consideration does not change any previous State Historic Preservation Officer concurred upon eligibility determinations, it does not actually assign eligibility, and it is not precedent setting for future work on the resource, because it is not an actual evaluation of the resource. Future projects which have a federal nexus will be required to determine if the resource is eligible/not eligible for the National Register of Historic Places/California Register of Historical Resources. Future projects would not be able to point to this document as proof of National Register of Historic Places/California Register of Historical Resources eligibility, because the assumption of eligibility consideration does not assign actual National Register of Historic Places eligibility status.

Had the project not utilized the assumption of eligibility consideration for this resource for the purposes of this project only, a full National Register of Historic Places/California Register of Historical Resources evaluation of each element of the resource within the project area, as well as the entire resource, would have been required, which could have resulted in a determination by the State Historic Preservation Officer that the resource is indeed eligible for the National Register of Historic Places and California Register of Historical Resources. The State Historic Preservation Officer is allowed and does make changes to previous determinations, based on updated information and based on the current appointed State Historic Preservation Officer, regardless of previous determinations.

As the project instead utilized the temporary assumption of eligibility consideration for the resource, and no actual evaluations were conducted, the State Historic Preservation Officer has not issued any formal eligibility determinations. As a result, any future work involving the resource are not constrained by the findings of the North County Corridor project. As this temporary eligibility designation only applies to the North County Corridor project and does not affect the resource's eligibility outside of this project, no correspondence with San Francisco Public Utilities Commission was necessary and no additional reference documentation was necessary to make the consideration for the purposes of this project only during the preparation of the cultural documentation. The State Historic Preservation Officer reviewed the cultural documentation and concurred with the findings as found in Attachment J SHPO Coordination of the NCC Final EIR/EIS.

Response 3E: Responsibility for relocation of existing utilities that are within the state and city right-of-way would follow state and federal regulations and statutes. All Build Alternatives would require relocation of existing utilities, but relocation of the Hetch-Hetchy electric transmission lines, Hetch-Hetchy underground pipelines and main canals would not be required.

Caltrans will consider the state and federal regulatory requirements for transmission line clearance and past engineering practice involving freeway crossings of San Francisco Public Utilities Commission pipelines for the proposed project engineering design for NCC crossings. All crossings will meet the minimum regulatory standards.

Response 3F: The environmental document discusses minimizing crossings of canals and utility corridors in section 2.3. Minimization of canal crossings and utility corridor impacts were built into the design as part of the project's features and through coordination with San Francisco Public Utilities Commission engineering staff. Coordination during preliminary design with the San Francisco Public Utilities Commission provided additional guidance and information to ensure the project minimized crossings of San Francisco Public Utilities Commission facilities, which is documented in Section 5.2 of the NCC Final EIR/EIS.

Relocation of the Hetch Hetchy power transmission lines and Hetch Hetchy underground water transmission lines is not anticipated. The project crosses Hetch Hetchy facilities 4 times. Each crossing is described in further detail below:

- In Segment 1, NCC crosses Hetch Hetchy approximately 1,200 feet west of the NCC/Oakdale Road intersection, and Oakdale Road alignment crosses Hetch Hetchy approximately 500 feet north of the NCC/Oakdale Road intersection. The crossings are at-grade over the water pipeline and under the power transmission lines.
- In Segment 2, NCC crosses Hetch Hetchy approximately 500 feet east of Langworth Road. The crossings are at-grade over the water pipeline and under the power transmission lines.
- In Segment 3, NCC crosses Hetch Hetchy approximately 500 feet south of Warnerville Road. The crossings are at-grade over the water pipeline and under the power transmission lines.

Once 1B was selected as the preferred alternative, it was determined that the project would not have any longitudinal encroachments on San Francisco Public Utilities Commission facilities and a Longitudinal Encroachment Exception will not be needed for the project. This information has been included in Section 3.1.5 of the NCC Final EIR/EIS.

Response 3G: Coordination with the San Francisco Public Utilities Commission has occurred beginning at the 6002 process kick-off meeting on October 2, 2010 and continued throughout preliminary design with multiple coordination meetings occurring in 2011, 2014, 2015, and most recently in 2018. Alternative 1B was selected as the preferred alternative and upon further analysis, has been identified as only having 4 crossings of Hetch-Hetchy facilities. Table 2.4.1 has been revised with the correct number of facility crossings. Continued coordination with the San Francisco Public Utilities Commission will occur during final design and right-of-way negotiations. It is anticipated impacts to San Francisco Public Utilities Commission right-of-way will be minimized during final design. Slight project modifications may be made during final design to further avoid impacts to San Francisco Public Utilities Commission utility corridors.

It is anticipated that any clearances for Hetchy-Hetchy facilities and North County Corridor would not incur mitigation for clearance deficiencies and would meet any CPUC GO-95 requirements. Additionally, the project will ensure that no access to SFPUC facilities is removed as part of the project, and access roads would be maintained to allow for continued access to Hetch-Hetchy infrastructure. Valve boxes would be relocated outside of Department right-of-way and access would be provided. Known facilities have been included in the preliminary plans and anticipated relocation costs have been included in the preliminary project estimates as part of utility costs. No additional impacts associated with pumping and/or discharge water for

maintenance purposes is anticipated, and no additional analysis related to energy usage or greenhouse gases was included in the final environmental document.

Response 3H: The proposed project could accommodate a Class III bike route in each direction on roadway shoulders from Claus Road to the eastern terminus at SR 108/SR 120. Local roads could accommodate Class II bicycle facilities. Class II bikeways are on-street bike lane facilities designated for bicyclists by a white stripe. The Class II facility is anticipated to comply with San Francisco Public Utilities Commission standards. Bicycle facilities will not be precluded from being considered that are consistent with the regional bikeway projects in the StanCOG Non-Motorized Transportation Master Plan. It is anticipated that the project would construct all bicycle and highway facilities within Caltrans right-of-way, and it is not anticipated a separate trail or recreational use would occur on San Francisco Public Utilities Commission property. 2.3 Build Alternative, 2.3.1 has further information on the roadway corridor.

Response 3I: It is anticipated that San Francisco Public Utilities Commission pipelines and power lines will not be relocated; however, the project will require eight valve boxes to be relocated and some access roads may be severed, which will require relocation. Valve boxes would be relocated outside of Caltrans' right-of-way, and access would be provided. This information has now been included within Section 3.1.5. for Utility and Emergency Services of the NCC Final EIR/EIS.

Further, clearances for Hetchy-Hetchy facilities and North County Corridor would not incur mitigation for clearance deficiencies and would meet any CPUC GO-95 requirements. Additionally, the project will ensure that no access to SFPUC facilities is removed as part of the project, and access roads would be maintained to allow for continued access to Hetch-Hetchy infrastructure. Once 1B was selected as the preferred alternative, it was determined that the project would not have any longitudinal encroachments on San Francisco Public Utilities Commission facilities and a Longitudinal Encroachment Exception will not be needed for the project. Valve boxes would be relocated outside of Department right-of-way and access would be provided. Known facilities have been included in the preliminary plans and anticipated relocation costs have been included in the preliminary project estimates as part of utility costs. At this time, it is not anticipated that transmission or intersect towers will be constructed as part of this project. No additional impacts associated with utilities is anticipated, and no additional analysis or mitigation measures were included in the final environmental document. This information has been included in Section 3.1.5 of the NCC Final EIR/EIS.

Response 3J: The Hetch Hetchy Aqueduct, Moccasin-Newark Transmission Line, and Warnerville Substation within the Area of Potential Effects are assumed eligible for the National Register, for the purposes of this project only, as part of a larger potential historic district that includes the Hetch Hetchy dam, aqueduct, electrical transmission towers and substations, and associated work camps. The potential historic district is assumed eligible under Criteria A and C, at the state level of significance, for its association as instrumental in the growth of San Francisco, and for innovative engineering techniques. Within the Area of Potential Effects, the Hetch Hetchy aqueduct and transmission line share a resource boundary that includes an approximately 200-foot right-of-way; the Warnerville Substation resource boundary is the Area

of Potential Effects limits. Character-defining features of the resources include the metal lattice transmission towers with cross arms, and the substation building.

Caltrans, in accordance with Section 106 Programmatic Agreement Stipulation VIII.C.4, determined that these properties within the APE are considered eligible for inclusion in the National Register of Historic Places for the purposes of this project only. Assumption of eligibility is a temporary eligibility consideration only given to a resource during the environmental analysis period if it is believed that project will not impact the resource. State Historic Preservation Officer concurrence on assumption of eligibility considerations is different than State Historic Preservation Officer concurrence on formal eligibility evaluations. For formal eligibility evaluations, State Historic Preservation Officer will provide concurrence on whether the resource is eligible for the National Register of Historic Places/California Register of Historical Resources. For temporary assumption of eligibility considerations, State Historic Preservation Officer provides concurrence not on the eligibility determination, but on a project's presumed impacts. It merely means that the SHPO is concurring on the project would not adversely/significantly impact the resource, *assuming* it is eligible for the National Register of Historic Places/California Register of Historical Resources. This temporary eligibility consideration does not change any previous State Historic Preservation Officer concurred upon eligibility determinations, it does not actually assign eligibility, and it is not precedent setting for future work on the resource, because it is not an actual evaluation of the resource. Future projects which have a federal nexus will be required to determine if the resource is eligible/not eligible for the National Register of Historic Places/California Register of Historical Resources. Future projects would not be able to point to this document as proof of National Register of Historic Places/California Register of Historical Resources eligibility, because the assumption of eligibility consideration does not assign actual National Register of Historic Places eligibility status.

Had the project not utilized the assumption of eligibility consideration for this resource for the purposes of this project only, a full National Register of Historic Places/California Register of Historical Resources evaluation of each element of the resource within the project area, as well as the entire resource, would have been required, which could have resulted in a determination by the State Historic Preservation Officer that the resource is indeed eligible for the National Register of Historic Places and California Register of Historical Resources. The State Historic Preservation Officer is allowed and does make changes to previous determinations, based on updated information and based on the current appointed State Historic Preservation Officer, regardless of previous determinations.

As the project instead utilized the temporary assumption of eligibility consideration for the resource, and no actual evaluations were conducted, the State Historic Preservation Officer has not issued any formal eligibility determinations. As a result, any future work involving the resource are not constrained by the findings of the North County Corridor project. As this temporary eligibility designation only applies to the North County Corridor project and does not affect the resource's eligibility outside of this project, no correspondence with San Francisco Public Utilities Commission was necessary and no additional reference documentation was necessary to make the consideration for the purposes of this project only during the preparation of the cultural documentation. The State Historic Preservation Officer reviewed the cultural

documentation and concurred with the findings as found in Attachment J SHPO Coordination of the NCC Final EIR/EIS.

Response 3K: The environmental document has been revised and updated, including Figure 3.1.8-1, which was updated to reflect the identified eligible resources.

Response 3L: Figure 2 in Appendix C of the Final Environmental Document has been changed from “Map #133” to “MR 6” in the legend of the figure. SHPO has provided concurrence, the records and correspondence associated with Section 4(f) resources have also been added into Attachment A of Appendix C and are included in the Final Environmental Document.

Response 3M: Coordination with the San Francisco Public Utilities Commission has occurred beginning at the 6002 process kick-off meeting on October 2, 2010 and continued throughout preliminary design with multiple coordination meetings occurring in 2011, 2014, 2015, and most recently in 2018. Further, a completed project review application with detailed design drawings will be submitted to the San Francisco Public Utilities Commission contact person listed in the instructions of the application, and consideration for the transmission line clearances, pipeline operation and protection, and access to infrastructures will be considered for the engineering design of the proposed project.

As part of the Project Review Process by the San Francisco Public Utilities Commission, Caltrans will work with San Francisco Public Utilities Commission Real Estate Services staff to obtain the appropriate real estate agreement(s) necessary to construct the proposed project and operation and maintain the NCC over and across San Francisco Public Utilities Commission property.

Response 3N: Detailed engineering drawings will be provided to the San Francisco Public Utilities Commission during final design. All detailed engineering drawings are anticipated to meet San Francisco Public Utilities Commission standards and requirements.

Response 3O: In response to the letter received, the project proponent has continued to coordinate with the San Francisco Public Utilities Commission to help address the concerns above, including providing exhibits, CAD files, and impact estimates on 4/25/2018, 6/20/2018, 7/11/2018, and 9/26/2018. Additional meetings with the San Francisco Public Utilities Commission will be scheduled during final design to ensure all requirements are met.

Comment 4

Comment from the United States, Dept. of Army, Dept. of Defense, Base Realignment and Closure Division

From: Orloski, Ed [mailto:Edward.Orloski@calibresys.com]
Sent: Wednesday, August 30, 2017 11:14 AM
To: Vallejo, Philip@DOT <philip.vallejo@dot.ca.gov>; Magsayo, Grace B@DOT <grace.magsayo@dot.ca.gov>
Cc: Procter, Webster W (Hank) CIV USARMY HQDA ACSIM (US) <webster.w.procter.civ@mail.mil>; Key, William F SWD <William.F.Key@usace.army.mil>; Boyd, Kelly CIV USARMY CESPK (US) <Kelly.Boyd@usace.army.mil>; david.a.brentlinger.civ@mail.mil; Orloski, Ed <Edward.Orloski@calibresys.com>
Subject: RIVERBANK ARMY AMMUNITION PLANT - "North County Corridor Projec"t

Philip, Grace,
My name is Ed Orloski. I work at the behest of the United States, Department of Army, Department of Defense, Base Realignment and Closure Division (BRAC) who is an owner of 105.32 acres (Riverbank Army Ammunition Plant) at the intersection of Claus Road and Claribel Road, City of Riverbank, Stanislaus County, CA. Although we have heard rumors about Caltrans plans for a "North County Corridor Project" for some time, we are concerned that appropriate individuals have not received notices, press releases, or notifications of public meetings with regard to this project. As you are aware, the Army and City of Riverbank are important stakeholders that are likely to be impacted by any one of Caltrans proposed routes for this project, hopefully in a positive way. Please keep the individuals on this distribution (above) apprised of all future notifications, in particular...

1. DAIM-ODB (BRAC Division) Attn: Webster W. Procter, Taylor Bldg/NC3, Rm. 5000, 2530 Crystal Drive, Arlington, VA 22202
2. U.S. Army District Engineer -Sacramento, Attn: Kelly Boyd, 1325 J Street, Room 802, Sacramento, CA 95814-2922
3. U.S. Army Corps of Engineers -SWD, Attn: William F. Key, 1100 Commerce St., Rm 831, Dallas, TX 75242
4. Riverbank Army Ammuntion Plant, Attn: David.A.Brentlinger, 5300 Claus Road, Riverbank CA 95367

Thank you.

Edward Orloski
570 574-3678 cell
Edward.Orloski.ctr@mail.mil

Response 4 to United States, Dept. of Army, Dept. of Defense, Base Realignment and Closure Division: Thank you for your comments; they have been included in the Final Environmental Document.

The contact information provided will be included on future distribution lists.

LOCAL GOVERNMENT COMMENTS

Comment 5
Comment from the Stanislaus County Environmental Review

Stanislaus County

CHIEF EXECUTIVE OFFICE

Jody L. Hayes
Chief Executive Officer

Patricia Hill Thomas
Chief Operations Officer/
Assistant Executive Officer

Keith D. Boggs
Assistant Executive Officer

Patrice M. Dietrich
Assistant Executive Officer

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

October 16, 2017

Caltrans District 6
Attention: Juan Torres
PO Box 12616
Fresno, CA 93778-2616

SUBJECT: ENVIRONMENTAL REFERRAL – CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) AND NORTH COUNTY CORRIDOR TRANSPORTATION EXPRESSWAY AUTHORITY (NCCTEA) – NORTH COUNTY CORRIDOR PROJECT – DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL STATEMENT (EIR/EIS)

Mr. Torres:

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
Sr. Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

1010 10th Street, Ste. 6800, Modesto, CA 95354 Post Office Box 3404
Modesto, California 95353 Phone: 209.525.6333 Fax: 209.544.6226

Response 5 to Stanislaus County Environmental Review: Thank you for your comments; they have been included in the Final Environmental Document.

Comment 6
Comment from the City of Modesto

CITY OF MODESTO CALIFORNIA

City of Modesto
Office of the City Manager
1010 Tenth Street, Suite 6100
Modesto, CA 95354

September 22, 2017

Juan Torres
Senior Environmental Planner
California Department of Transportation
855 M Street, Suite 200
Fresno CA 93721

RE: North County Corridor Draft EIR review comments

Mr. Torres:

Thank you for the opportunity to review the subject document. The following comments are intended to assist you in finalizing the environmental review documentation process for the North County Corridor:

1. Text on Chapter 1, Page 1, indicates that "...Caltrans will relinquish the existing SR-108 to the County of Stanislaus." Would Caltrans also relinquish to the City of Modesto the portion of SR-108 through downtown Modesto along McHenry Avenue to the project site? If so, then the City would have continued concerns regarding the potential transfer of long-term liabilities associated with management and maintenance of McHenry Avenue. Prior to any relinquishment of the CalTrans facility to the City, a formal agreement that explicitly defines each agency's responsibility for maintenance and improvements should be established. These concerns should be addressed in the NCC EIR.

2. Table 1.2.2-1 on page 6 indicates the Modesto general plan projects a 2030 population for the City of 411,788. However, page I-2 of the Modesto Urban Area General Plan Master EIR describes an anticipated 2025 population of approximately 334,000 – 357,000. The 411,788 figure is more than ten percent too high; 370,000 is a more accurate figure to associate with a 2030 population projection for Modesto. This figure is derived by applying the 1.3 percent growth rate assumed in the StanCOG RTP/SCS to the midpoint of the range referenced on page I-2 of the General Plan Master EIR, from 2025 to 2030.

6A

6B

P.O. Box 642, Modesto, CA 95353 www.modestogov.com Phone: (209) 577-5267 • Fax: (209) 491-5798

3. Text under the subheader "*Development Trends*" on page 44 states that "...unprecedented population growth continues to increase pressure to convert agricultural lands to non-agricultural uses (Stanislaus County 1994)." However, recent population growth has been flat and even negative during certain years in the current decade. According to the U.S. Census Bureau, Modesto's population increased an estimated 4.5 percent during the six-year period from 2010 to 2016; this is an approximate 0.7 percent annual increase. 6C

4. Table 3.1.1.1-1 on page 46 indicates that the Tivoli specific plan area is "...in a currently unincorporated area of Stanislaus County, next to the...City of Modesto." However, this area (bounded by Claratina Ave., Roselle Ave., Sylvan Ave. & Oakdale Rd.) has been annexed to Modesto since 2008. 6D

5. Table 3.1.1.2-3 and text on page 166 indicates that "Class 3 bike routes would be accommodated..." City staff believes that bicycle traffic should be accommodated via a Class 2 striped lane at a minimum, while a separated Class I or Class IV facility would be preferred for the safety of bicyclists. 6E

6. The land use data file and the roadway network file for the NCC Travel Demand Forecast Model (Model) were compared with Table 3.1.1.1-1 (Future Projects) in the Draft EIR. Comparing the development assumptions of the NCC Model to the development projects listed in the Table 3.1.1.1-1 shows they are not consistent. Comparisons reveal that although the NCC Model assumed partial development in the Tivoli Specific Plan area (see Comment #3, above, for location), it also assumes far more development than what is shown in Table 3.1.1.1-1 in the areas along the NCC between Claribel and Claratina. 6F

7. The land area and land uses in the NCC Model have been compared with those in the Modesto General Plan Model. The comparisons reveal that the land use development assumptions of the NCC Model are less than those in the Modesto General Plan transportation Model for the area along the NCC within the Modesto General Plan boundary.

8. The NCC Model land uses for the Tivoli Specific Plan area are inconsistent with the adopted Tivoli Specific Plan. For example, the Tivoli Specific Plan area covers 454 acres, while the NCC Model data shows it has 981 acres (also, Table 3.1.1.1-1 indicates that the Tivoli area is 345 acres). Dwelling unit counts and employee assumptions based on development potential that are included in the NCC Model are significantly less than what's shown in the adopted Tivoli Specific Plan. 6G

9. The issue of inconsistent land use / development assumptions, described in Comment #6, between the project traffic model and the Modesto General Plan traffic model also exists generally along the SR219 / Kiernan Ave. alignment from SR99 to the eastern Modesto General Plan boundary. Lane count assumptions for project area roadways are also inconsistent between the two traffic models.

6G

We appreciate the opportunity to provide comments following our review of the Draft EIR. We believe that these comments are important because data and information that is more accurate will provide improved bases for drawing conclusions described within the document.

If you have any questions regarding this letter, please contact me at 209.341.2938, or by email at cbirdsill@modestogov.com (we would be happy to share the Tivoli Specific Plan documentation, and/or our general plan traffic model and related data, if you're interested in reviewing those to gain additonal insight to certain comments provided above).

Sincerely,

Joseph P. Lopez, Interim City Manager

cc: Modesto City Council
Cynthia Birdsill, Director of Community and Economic Development
Patrick Kelly, AICP, Planning Manager
Brad Wall, AICP, Principal Planner

Response 6 to City of Modesto: Thank you for your comments; they have been included in the Final Environmental Document.

Response 6A: The existing State Route 108 and McHenry Avenue would be relinquished to the County/City and remain in place. Additional discussions regarding relinquishment and maintenance agreements between Caltrans and the local jurisdictions are anticipated to occur during the right-of-way phase.

Response 6B: Page I-2 of the 2008 Modesto Urban Area General Plan Master EIR (Executive Summary) states that "the future population within the adopted planning area is estimated to be 428,300", to be reached "some time after the 2025 planning horizon," and that current infrastructure plans would "accommodate an estimated population between 334,000 and 357,000 people within the City's existing Sphere of Interest (SOI)… The planning area is larger than the City's existing SOI." Per recommendation of the City, an estimated growth percentage of 1.3 was applied to the estimated 2025 population midpoint range to determine the future population estimation at year 2030 is approximately 370,000. Therefore, Table 1.2.2-1 of the NCC Final EIR/EIS was updated to reflect the future estimated population of 370,000 and the citation of the Modesto Urban Area General Plan Master EIR and StanCOG RTP/SCS was added.

Response 6C: This sentence will be changed to remove "…unprecedented population growth…" and replaced with "…population growth…."

Response 6D: The reference to Tivoli specific plan area as an unincorporated area of Stanislaus County will be omitted from Table 3.1.1.1-1.

Response 6E: Class III facilities meet the Caltrans design standards for the current NCC project; however, Class I or IV may be considered in future projects.

Response 6F: The NCC specific traffic model is based on data from the 2011 Region Transportation Plan Travel Demand Model proposed by StanCOG. The 2011 Regional Transportation Plan Travel Demand Model included a wide range of data sources to project total regional traffic volumes such as regional growth, local populations, and commercial and residential development. Table 3.1.1.1-1 is a representative list of future projects (e.g. Crossroads West Specific Plan in City of Riverbank, Woodglen Specific Plan in City of Modesto, and the Tivoli Specific Plan in city of Modesto); however, it is not all-inclusive. Additionally, the Traffic Operations Report (2015) incorporated known data from City of Modesto.

Response 6G: The NCC specific traffic model is based on data from the 2011 Region Transportation Plan Travel Demand Model proposed by StanCOG. The 2011 Regional Transportation Plan Travel Demand Model included a wide range of data sources to project total regional traffic volumes such as regional growth, local populations, and commercial and residential development.

Comment 7
Comment from the City of Riverbank

City Of Riverbank
6707 Third Street, Riverbank, CA 95367
Office (209) 863-7120 FAX (209) 869-7126

September 19, 2017

Mr. Juan Torres
Senior Environmental Planner
California Department of Transportation
Central Sierra Environmental Analysis Branch
855 M Street, Suite 200
Fresno, CA 93721

Subject: Stanislaus County North County Corridor (NCC) - New State Route (SR) 108 Project and Route Adoption EIR/EIS Comments

Dear Mr. Torres,

The City of Riverbank appreciates the opportunity to comment on the NCC EIR/EIS released for our review officially on August 8, 2017. Since 2010 the City of Riverbank has participated in the North County Corridor Transportation Expressway Authority (NCCTEA) as a member agency along with the Cities of Modesto and Oakdale, as well as Stanislaus County, STANCOG and CALTRANS District 10. We continue to play an active role in the review and administration of this vital investment in our community.

The City of Riverbank remains concerned regarding the potential transfer of any long-term liabilities associated with the future CALTRANS relinquishment of SR 108 to local government for management and maintenance. This of course includes any responsibilities for storm drainage treatment necessary to satisfy the Regional Water Quality Control Board. The City of Riverbank is also concerned with the lack of analysis associated with the potential loss of commercial revenue associated with the relocation of SR 108 in the proposed locations. The fiscal impacts of this traffic shift should be evaluated under a costs-benefit analysis required by the EIS process. 7A

We realize detailed construction drawings have yet to be developed. We are however concerned with the future alignment of the new Claribel Road at near Coffee Road on the west and Terminal on the East. The drawings presented are not clear as to illustrate what access, if any, will be allowed to Terminal and how Terminal Road will be treated near the NCC and the 7B

new alignment of Claribel Road. We assume for example that Terminal will pass under the NCC, but cannot tell what happens with Terminal north of the NCC alignment.

We look forward to working with Stanislaus County and the NCCTEA to consider an urban interchange of the NCC with Eleanor to the east of town. The City of Riverbank has successfully expanded the Sphere of Influence to promote job generating land use opportunities on the east side of Riverbank. In this regard, access to the NCC on the east side of Riverbank would prove to be a vital link for regional job creation associated with the Riverbank Industrial complex. The potential addition of an urban interchange at Eleanor will provide the necessary access needed for the industrial businesses connectivity to the NCC.

As requested, below are detailed comments prepared by Riverbank staff on the released NCC EIR/EIS complete with page references. Generally the document looks fairly complete. It is anticipated that the Riverbank City Council will forward a recommendation on a preferred alignment after the comment period for this EIR/EIS has closed.

7B

Page 5 – Population Assumptions appear to be grossly overstated through the 2030 time frame. Riverbank's population as stated in the NCC EIR/EIS is projected to be 69,508 by 2030, while Stanislaus County's population is forecasted to be 821,715. The adopted Riverbank MSR and Housing Element project the population to be 34,961 by 2035 and 39,198 by 2045. The University of Pacific, Eberhardt School of Business, Center of Business and Policy Research recently completed a Forecast Summary for Stanislaus County on July 6, 2016 which projects the populations for Stanislaus County and the associated census tracts to be:

Table 1-Census County Division Forecast

	2015	2020	2025	2030	2035	2040	2045	2050	2055	2060
Airport	2,044	2,135	2,237	2,341	2,444	2,544	2,642	2,738	2,834	2,932
Bret Harte	5,379	5,639	5,930	6,228	6,522	6,809	7,088	7,363	7,638	7,916
Bystrom	4,184	4,385	4,610	4,841	5,068	5,290	5,506	5,719	5,932	6,147
Ceres	48,029	51,049	54,424	57,879	61,290	64,628	67,866	71,050	74,247	77,476
Cowan	324	329	336	343	349	356	362	368	375	381
Crows landing	367	381	397	413	428	444	458	47	488	503
Del Rio	1,329	1,396	1,471	1,549	1,625	1699	1,771	1,842	1914	1986
Denair	4,615	4,857	5,128	5,406	5,680	5,947	6,207	6,463	6,720	6,979
Diablo Grande	918	1,026	1,146	1,270	1,391	1,511	1,626	1,740	1,854	1,969
East Oakdale	2,867	2,987	3,121	3,259	3,394	3,527	3,655	3,782	3,909	4,037
Empire	4,394	4,630	4,893	5,163	5,429	5,689	5,942	6,190	6,440	6,692
Grayson	983	1,019	1,059	1,099	1,139	1179	1,217	1,254	1292	1,330
Hickman	672	708	748	789	829	869	907	945	983	1021
Hughson	7,080	7,591	8,162	8,746	9,323	9,888	10,436	10,975	11,515	12,062
Keyes	5,828	6,087	6,376	6,672	6,965	7,251	7,529	7,802	8,076	8,353
Modesto	210,341	220,865	232,622	244,662	256,545	268,176	279,460	290,555	301,694	312,943
Monterey Park Tract	138	143	149	155	161	167	172	178	184	189
Newman	10,854	11,584	12,400	13,235	14,060	14,867	15,650	16,420	17,192	17,973
Oakdale	21,902	23,322	24,909	26,534	28,138	29,707	31,230	32,728	34,231	35,749
Parklawn	1,380	1,429	1,483	1539	1,594	1648	1700	1751	1803	1,855
Patterson	23,067	26,190	29,678	33,251	36,777	40,228	43,577	46,869	50,175	53,513
Riverbank	24,064	25,670	27,463	29,300	31,113	32,888	34,609	36,302	38,002	39,718
Riverdale Park	1,165	1,206	1,252	1,299	1346	1,391	1436	1,479	1,523	1,567
Rouse	2,056	2,112	2,175	2,239	2,303	2,365	2,426	2,485	2,545	2,605
Salida	14,764	15,978	17,335	18,724	20,095	21,437	22,739	24,019	25,305	26,603
Shackelford	3,508	3,665	3,840	4,019	4,195	4,368	4,536	4,701	4,867	5,034
Turlock	72,229	76,475	81,219	86,077	90,872	95,564	100,117	104,594	109,089	113,627
Valley Home	229	229	229	229	230	230	230	230	231	231
Waterford	8,909	9,431	10,015	10,613	11,203	11,780	12,34	12,891	13,445	14,003
West Modesto	5,923	6,198	6,505	6,820	7,131	7,435	7,730	8,020	8,311	8,605
Westley	620	639	661	683	704	726	746	767	787	807
Rest of the County	50,635	51,783	53,066	54,379	55,676	56,945	58,176	59,387	60,602	61,830
Total County	540,794	571,139	605,040	639,754	674,019	707,554	740,090	772,081	804,200	836,635

7C

These population numbers appear to present an even lower population projection than Riverbank has anticipated through 2035, 31,113 persons versus 34,961. The point is the NCC projections through 2030 appear to be 98% higher than projected by the City of Riverbank and 28.4% higher than projected for Stanislaus County. If the traffic modeling performed used these population numbers to determine traffic volumes, the model would be flawed in that it projects a greater traffic volume earlier in the build cycle. 7C

Pages 25 and 26 - Improvements Anticipated to Hwy 108 corridor within the City of Riverbank- The only intersection projects listed are future signalization projects at First and Claus as well as the widening of SR 108 to four lanes from Jackson Street to BNSF tracks. It appears this document misses all the traffic improvements contemplated by the Riverbank AB 1600 fees (Table 3-12, page 19) worth nearly $43 million. 7D

Page 31 - Project Costs Summary - Does the projected costs include Agricultural Mitigation fees and Mitigation fees for loss of Swainson Hawk Habitat as well as the possible loss of habitat for other sensitive species? 7E

Page 44 – Reference is made to Figure 3.1.1.1-1 in Appendix A which shows current zoning within the project area. The area which includes the Riverbank Industrial Complex is zoned Specific Plan #2 and not Industrial. The area westerly of Claus Road is not in the City limits and is zoned by the County as Exclusive Ag-10 and not Industrial. 7F

Page 44- Reference is made to Figure 3.1.1.1-2 showing the pattern of land use and Table 3.1.1.1-1 a list of potentially influential projects. These exhibits do not list several projects in Riverbank and does not accurately reflect development potential in the Riverbank Industrial Complex. Approved and/or pending projects in Riverbank include:

1) Riverbank Industrial Complex- 146 acre Specific Plan could generate 119,058 sq. ft. of Commercial/Retail, 1,411,541 sq. ft. of Industrial and 116,637 sq. ft. of Office/R&D.
2) Bruinville Development East Side of Riverbank- 515 potential single family homes plus Riverbank Family Apartments 72 units of HDR.
3) Crossroads West Specific Plan – 390 acre Specific Plan could generate 1,872 LDR Units, 192 MDR Units, 388 HDR Units, 550,000 sq. ft. of commercial/retail, fire station site, expanded parks and regional sports complex as well as schools.

In the NCC traffic model, an appreciable amount of future development is assumed in the area that is south of Claribel around the NCC. Roughly 2,900 new residences are assumed. This issue is important since while all of the dwellings were assumed to have access to Oakdale Road or Roselle, they were also assumed to access Claribel north of the NCC, which will increase traffic in the area of Crossroads West. Why are areas south of the NCC assumed to get access to Claribel? 7G

Almost no growth is assumed in the North Modesto/Tivoli Specific Plan area, which is one of the areas illustrated in the NCC traffic model. The difference between baseline and year 2042 models was only 24 new residences and 43 new employees in this area. Development in the most northerly end of Modesto is unlikely by 2042 and the 3,000 residences assumed along NCC should instead be moved to Tivoli as part of that site's buildout. Tivoli could then be assumed to be fully built out with its maximum residential and retail potential. Why isn't Tivoli in the land use set?

Page 57 - Riverbank General Plan Polices and Compliance - The City of Riverbank's General Plan relies on connectivity of local streets to roads managed by the State of California as well as Stanislaus County. The proposed NCC cuts off the eastern circulation of the City from accessing the NCC easterly of Claus Road beyond Langworth Road. This design is inconsistent with the Riverbank General Plan Land Use and Circulation Elements. Attention needs to be focused on analyzing the impacts associated with this proposed circulation pattern. 7H

Page 71 -Table 3.1.2.-1, Population Projection - Same comment as above. The NCC EIR/EIS assumes a County wide population of 953,580 people by 2060 versus the projections provided by UOP of 836,635. 7I

Page 96 - Planned Residential Development within Project Vicinity- There is no mention of the Crossroads West Specific Plan Area. 7J

General Note-All data is taken from the U.S. Census. Why not use multiple sources?

Page 105- Paragraph 3 – There is a spelling error. "Riverside" should be "Riverbank." 7K

Page 141 -With the potential development of the Riverbank Industrial Park and Crossroads West, the Claus Road/Ciaribel Road intersection may warrant an overpass instead of an at-grade signal. 7L

Page 171- Paragraph 3- The EIR/EIS states "While some of the motorists would be residents, a large number of motorists are likely to be commuters and tourists going to Yosemite..." What data or estimates are being used to determine the number of commuters vs. tourists? Would it not be the case that the majority of commuters will be local residents? 7M

Page 175- *Key View 2*- The EIR/EIS states "visual quality in this view is moderate-low" yet also states that there is a "lack of memorable features." Moderately-low is defined as "low negative change...with a moderate viewer response, or moderate negative change...with a low viewer response." Given the proposed overpass, there will be a significant impact to the visual quality of the neighborhood to residents living on Claribel Rd. between Litt Rd. and Terminal Ave. and on Terminal between Plainview and Claribel Rd. 7N

Page 177- *Visual Assessment Unit 1 (VAU1) Resource Change* & *Visual Assessment 2 (VAU2) Resource Change*- Both assessments conclude that "the overall visual resource change...as a result of Alternative 1A is expected to be moderate-low" yet VAU1's visual character and quality would change *minimally*, while VAU2's would change (no indication of the level). Given this assessment, the use of the term "moderate-low" seems to be inconsistent. 7O

Page 178 - *Build Alternative 2A* – sentence states "Alternative 2A will also include 24 canal crossings, 21 at-grade and six elevated..." Do the 21 at-grade and 6 elevated crossings refer to the 24 canal crossings? The sentence is confusing. 7P

Page 178- *Visual Assessment Unit 2 (VAU2) Resource Change*- VAU2 visual quality change for Alternative 2A is described as moderate, and the visual resource change for 1B is moderate-high. Both explanations provide the exact same reasoning yet the determination is different. The terms seem to be used inconsistently based on the exact same explanations. 7Q

Page 180 - *Change to Visual Quality/Character* - The project will create a new overpass over Terminal Ave. The explanation states that "...visual encroachment in the view is the new North 7R

County Corridor structure, which is similarly appropriate for the area." There is currently no overpass in the area, how was it determined that the new structure is "appropriate"? 7R

Page 180- *Viewer Response-* The EIR/EIS states that "...there would be a change in the view, but it would fit in with the existing visual character and quality of the existing road." It seems out of place to visually compare an expressway to a local road. 7S

Page 216- Regulatory Setting, Paragraph 4- Reference is made to Appendix C. Appendix C has a header that marks it as Appendix B. 7T

Page 218 - Buried Archaeological Sites - states that "archeological site identification and evaluation is not complete". This section comments throughout that there were right-of-entry limitations and that once the preferred alternative is selected then they will make further attempts to obtain right-of-entry. What are the alternatives should they not obtain it? How will a full evaluation be made? 7U

Pages 264 and 265 - High Risk Sites, Riverbank Army Ammunition Plant - This section of the document inaccurately states that a Finding of Suitability for Early Transfer ("FOSET") was prepared in 2010 and that the FOSET transferred the management of the property from the Army to the Riverbank Local Redevelopment Authority ("RLRA"). In fact, the RLRA is leasing the former Army Ammunition Plant from the Army through an Interim Master Lease ("ILM") executed in 2016. The IML allows for the RLRA to perform operations and maintenance functions on behalf of the Army until conveyance.

A FOSET is a document between the Army and the regulatory agencies that will allow for a covenant deferral or a transfer of the property prior to full remediation. There is a FOSET for the Riverbank facility in draft form and under review by Federal and State regulatory agencies. The responsibility for cleanup of the property was not transferred to the RLRA. The Army retained the responsibility for remediation of Parcels 1 and 1a under discussion. 7V(a)

The Army has not sold any of the RBAAP and there are no parcels currently up for sale. A sale of the property must be preceded by a clean bill of environmental health, via a Finding of Suitability for Transfer ("FOST") or with regulatory and gubernatorial concurrence for an early transfer. The Army has determined that they will sell remediated portions of the property but no sale has been scheduled. 7V(b)

Remediation of the polychlorinated biphenyl contamination on Parcel 1 and 1a is substantially complete under the supervision of the Sacramento Army Corps of Engineers. Review of the sampling analysis by regulatory agencies is in process to clear the sites prior to any transfer or sale.

It is worth noting that the Army retains all responsibility now and in the future for cleanup for any contamination caused by military activities under Section 330 of the National Defense Authorization Act. 7V(c)

The City is in close communications with the Army regarding the former Riverbank Army Ammunition Plant. The Army has shared concerns over the lack of coordination with regard to the preferred alignment going through Parcel 1 and 1a. The City recommends direct interaction with the project manager at the Headquarters of the Army, Base Closure and Realignment Office. 7V(d)

Page 310- Terminal Avenue to Claus Road, Paragraphs 1 and 2 – Paragraph 1 states the NAC is "exceed" at this location so a barrier is under consideration. Paragraph 2 states that at this location, no substantial increase from existing noise levels to build noise levels is anticipated so no barrier is considered. Is there or is there not a barrier considered for this location? "Exceed" should be changed to "exceeded" throughout the noise section. 7W

Page 333- Abatement Measures, Temporary Construction Impacts – Measure NOI-1 states: Standard Special Provision (SSP 14-8.01) will be edited specifically for this project during the PS&E phase and included to reduce noise impacts during construction. How will it be edited? What options are available? 7X

Page 348- Plant Species, Regulatory Setting- Paragraph 1 refers to Threatened and Endangered Species Section 3.3.5. Figure 3.3.5-1 Special-Status Mapping page 1 of 2 is missing. 7Y

Page 394 - Swainson Hawk Mitigation Measure BI0-43- states a 600 setback and nest monitoring. It notes that no compensatory mitigation is proposed and instead the project will simply try and avoid/minimize potential impacts to suitable foraging habitat. Given the large size and scale of this project it is difficult fathom why this wouldn't fall into a category of a project that is required to pay mitigation fees. The mitigation measures (for example on federally protected bat species) are in order of magnitude more expensive and complete. BI0-44 states foraging habitat areas shall be avoided where possible. Seems like if most development of rural vacant land in this area is required to pay the fee so should this project. Development Projects in Riverbank that are converting foraging habitat to urban uses are required to mitigate the impact of lost foraging ground. 7Z

Page 402- Table 3.6-1 - Lists a number of City of Modesto, Stanislaus County and City of Oakdale projects but only lists one Riverbank project (the LRA project). There is no mention of Crossroads West, or Bruinville, the Residential Development on the eastern side of town, which is certainly within the area of concern for routes 1a and 1b. Those should be added to the chart. 7AA

Finally the City of Riverbank would like to verify that the City of Riverbank Police Services will have no direct jurisdictional responsibility for the public safety services of this roadway/project. Regardless of route alternative the vast majority of the project will exist outside of City limits and those parts that may be within City limits (now or in the future) should be the responsibility of Cal Trans and the California Highway Patrol. 7BB

We look forward to discussing this project in greater detail. Should you have any questions please feel free to contact me at 209-863-7115 or sscully@riverbank.org

Respectfully,

Sean Scully
City Manager
City of Riverbank

Cc: Riverbank City Council
Kathleen Cleek, Development Services Administration Manager
Donna Kenney, Planning and Building Manager
Debbie Olson, Riverbank Local Redevelopment Authority, Executive Director

Page 6

Response 7 to City of Riverbank: Thank you for your comments; they have been included in the Final Environmental Document.

Response 7A: The existing State Route108 would be relinquished to the County/City and remain in place. Additional discussions regarding relinquishment and maintenance agreements between Caltrans and the local jurisdictions are anticipated to occur during the right-of-way phase.

Caltrans understands your concerns regarding this project and the potential for the project to change the existing economic character of downtown Riverbank. Exact changes to the economic character of downtown cannot be predicted; however, many project features have been designed to improve characteristics in the region, such as improving traffic circulation. Any relocated businesses will be compensated for their relocation and potential economic impacts will be minimized by locating directional signage to key commercial centers and providing for accessible ingress/egress routes into parking lots. Additionally, the new state routes will have restricted access, which will limit development along the corridor.

Response 7B: Terminal Avenue continues on its existing alignment to the north and south of NCC, and will pass beneath the NCC structures. Access to the realigned Claribel Road and existing Terminal Avenue will still be available along local roads. Claus Road will provide the most direct access to Claribel Road and existing Terminal Avenue. The project will continue coordination with the City throughout final design to ensure necessary access is maintained.

Response 7C: The NCC specific traffic model is based on data from the 2011 Region Transportation Plan Travel Demand Model proposed by StanCOG. The 2011 Regional Transportation Plan Travel Demand Model included a wide range of data sources to project total regional traffic volumes such as regional growth, local populations, and commercial and residential development. The 2035 population estimates for the City of Riverbank will be updated to reflect the 2016 StanCOG Forecast Summary of 31,113.

Response 7D: The following State Route 108 improvements will be added to the document, as cited in the 2015 City of Riverbank Nexus Fee Study Administrative Draft: Widen Callander Avenue (State Route 108)/Santa Fe Street intersection

- Reconstruct Callander Avenue (State Route 108)/Patterson Road intersection to create second northbound lane and modify traffic signal
- Construct a traffic signal at Atchison Street (State Route 108)/Claus Road
- Widen State Route 108 to four lanes from Jackson Street to BNSF overcrossing
- Widen to four lanes from McHenry Avenue to Coffee Road
- Widen to four lanes from Oakdale Road to Jackson Street
- Widen to four lanes from Santa Fe Street to 1st Street
- Widen to four lanes from Claus Road to Snedigar Road
- Widen to four lanes from Squire Wells Way to Roselle Avenue
- Widen to four lanes from Roselle Avenue to Terminal Avenue
- Widen to four lanes from Terminal Avenue to Claus Road
- Widen to four lanes from Claus Road to Eleanor Avenue
- Widen to four lanes from Terminal Avenue to Snedigar Road

- Build to ultimate configuration from Patterson Road to Claribel Road
- Widen to four lanes from State Route 108 to Patterson Road
- Widen to four lanes from Townsend Street to Claribel Road
- Construct a traffic signal at State Route 108/Coffee Road
- Construct a traffic signal at Retail Access/Claribel Road
- Construct a traffic signal at Roselle Avenue/Glow Road
- Construct a traffic signal at Patterson Road/Terminal Avenue
- Construct a traffic signal at Patterson Road/Snedigar Road
- Construct a traffic signal at Claus Road/California Avenue
- Construct a traffic signal at Claus Road/Kentucky Avenue
- Construct a traffic signal at Claribel Road/Eleanor Avenue
- Improve a railroad crossing at Patterson Road and Snediger Road and Patterson Road west of Terminal Avenue
- Widen bridge at Coffee Road north of State Route 108, northwest of Claribel and Oakdale Roads
- Relocate utilities at Morrill Road to Claribel Road and Claus Road between State Route 108 and Claribel Road
- Construct a traffic signal at Claribel Road/Terminal Avenue

Response 7E: The estimated project costs included in the environmental document include all environmental mitigation fees.

Response 7F: The area westerly of Claus Road will be removed from the City of Riverbank's limits and changed from "Industrial" zoning to "Exclusive Ag-10" zoning.

Response 7G: The three pending projects provided (Riverbank Industrial Complex, Bruinville Development East Side of Riverbank, and Crossroads West Specific Plan) have been added to Table 3.1.1.1-1.

Access via local roads will be maintained to Claribel Road for planned development south of the NCC including anticipated development of the Tivoli Specific Plan.

The NCC specific traffic model is based on data from the 2011 Region Transportation Plan Travel Demand Model proposed by StanCOG. The 2011 Regional Transportation Plan Travel Demand Model included a wide range of data sources to project total regional traffic volumes such as regional growth, local populations, and commercial and residential development. The NCC has been identified as an improvement measure to accommodate regional east-west traffic and to improve north-south network connectivity, which includes access to Claribel Road.

Response 7H: The NCC project has been designed to be consistent with the City of Riverbank's General Plan. Policy CIRC-3.7 identifies a future east-west expressway through northern Stanislaus County to ensure that transit service is provided along the route, including potentially the use of High Occupancy Vehicle/transit-only lanes during peak hours, which is consistent with the planned expressway.

Changes in regional traffic circulation as a result of this project have been evaluated to ensure that adverse traffic impacts to local agencies are minimized where feasible. A detailed

discussion of traffic and circulation is provided in Section 3.1.6 of the NCC Final EIR/EIS. Stanislaus County and Caltrans intend to continue to coordinate with the City of Riverbank during final design of the project to ensure that specific concerns for access to the new facility are addressed, and where appropriate incorporated in the project.

Response 7I: Population forecasts published by the California Department of Finance through 2060 suggest that population growth and its associated development will continue in the study area and surrounding region. Table 3.1.2.-1 summarizes the population projection for Stanislaus County. The Stanislaus County population is expected to increase by 76.3 percent over the 45-year period from 2015 to 2060. In comparison, the general population for California is forecasted to grow 35.8 percent.

Table 1.2.2-1 – Projected Population in Northern Stanislaus County (with data sources) has been altered to reflect the 2008 Modesto Urban Area General Plan Master EIR, Executive Summary and the 2016 Riverbank Municipal Service Review and Sphere of Influence Update. The table is referenced below to indicate the project populations used for the proposed project (found on page 6 of the NCC Final EIR/EIS Volume I of II):

The 2035 population estimates for the City of Riverbank will be updated to reflect the 2016 StanCOG Forecast Summary of 29,300.

Response 7J: The Crossroads West Specific Plan Area was added to Tables 3.1.1.1-1 and 3.6-1 – Future Projects – in Chapter 3 of the NCC Final EIR/EIS. The 2035 population estimates for the City of Riverbank will be updated to reflect the 2016 StanCOG Forecast Summary of 29,300. One source was used for consistency throughout the document; StanCOG 2016 has been added as a reference in Table 3.1.2-1.

Response 7K: “Riverside” was changed to “Riverbank.”

Response 7L: An overpass at Claus Road/Claribel Road is not feasible without additional right-of-way impacts to local businesses. The proposed at-grade signalized intersection will have the smallest project footprint at this location and will minimize right-of-way acquisitions.

Response 7M: Language has been changed to reflect that while some motorists would be residents, including local commuters, motorists also include long distance commuters and tourists traveling to Yosemite. Due to the motorists brief exposure to the visual environment, they are less likely to value aesthetics within the project area.

Response 7N: The document states the visual impact will be moderate due to the proposed overpass near Claribel Road between Litt Road and Terminal Avenue and on Terminal Avenue between Plainview and Claribel Roads. The visual impact was in part determined to be moderate due to the existing exposure for residents along Claribel Road from vehicles exiting the State Route 99 corridor. This existing exposure to highway traffic, along with the change in viewer response for residents in the area, will result in a moderate visual impact and will be minimized with the incorporation of measures VR-1, VR-2, and VR-3.

Response 7O: The term “moderate-low” will be changed to “low” to reflect the minimally changed visual impact in VAU1 and VAU2.

Response 7P: Alternative 2A includes 25 canal crossings, including 21 at-grade and four elevated canal crossings. The section has been revised for consistency with the current design of the Build Alternatives.

Response 7Q: Visual quality changes are based on a quantitative evaluation. While qualitative descriptions may be similar to one another in VAU2, the determinations for impacts to visual changes are based on the quantitative evaluations. Please refer to Section 3.1.7 of the NCC Final EIR/EIS – Visual Resources – and the *Visual Impact Assessment* (2014) for the NCC project for detailed tables, analyses, and discussions of the visual impacts for Alternatives 2A and 1B.

Response 7R: Determinations regarding the proposed new overpass are based on the existing residential, commercial, and industrial development in the area as well as proximity to State Route 99. The overpass was determined to be visually appropriate and have moderate visual impacts due to the existing proximity to State Route 99 and proximity and exposure for residents along Claribel Road from vehicles traveling along and exiting the State Route 99 corridor. The visual conditions from existing residential, commercial, and industrial developments and their encroachment into the visual landscape were factored into the visual impacts determination and the new overhead structure was determined to contribute to moderate intactness. This existing exposure to highway traffic, along with the change in viewer response for residents in the area results in a similarly appropriate overhead structure and a moderate visual impact.

Response 7S: The visual comparison is of the views from the local road as they currently exist and after project implementation. The *Visual Impact Assessment* (2014) determined that the visual impact would be *moderate*, as the expressway would be introduced as an element in the viewshed. Impacts were established as *moderate* based on the existing built environment due to the visual conditions from existing residential, commercial, and industrial developments, and their encroachment into the visual landscape was factored into the visual impacts determination. It was determined the proposed expressway would only slightly lower the visual quality of the area.

Response 7T: References will be corrected to accurately reflect the nomenclature as “Appendix C.”

Response 7U: The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Caltrans has prepared a Programmatic Agreement to implement a phased approach to complete identification, evaluation of potential historic properties, effect finding determinations, and mitigation requirements (if applicable), after right-of-entry to the remaining parcels has been obtained for those within the right-of-way of Alternative 1B. As access is acquired, then identification and evaluation will occur during the right-of-way phase of the NCC project and be completed before the start of construction.

Response 7V(a): The document has been revised to state that the Riverbank Local Redevelopment Authority is leasing the Army Ammunition Plant through an Interim Master Lease executed in 2016.

Response 7V(b): The document has been revised to state that these parcels are not currently for sale by the U.S. Army because a Finding of Suitability for Transfer has not yet been

completed nor has the parcel been granted regulatory and gubernatorial concurrence for an early transfer.

Response 7V(c): The document notes that the U.S. Army is obligated to continue remediation on the site and will complete all necessary remediation of the property, including remediation of contaminated groundwater, groundwater monitoring, and long-term monitoring of the landfill cap, even while Riverbank Local Redevelopment Authority is the manager of the property.

Response 7V(d): The project proponents will continue to coordinate with the U.S. Army Corps of Engineers regarding proposed impacts to the Riverbank Ammunition Plant.

Response 7W: The term “exceed” was replaced with “exceeded” in appropriate areas throughout the section. A barrier was considered at this location because the NAC was exceeded.

Response 7X: Work hour restrictions will be edited to be project-specific.

Response 7Y: Page 1 of 2 will be added to Figure 3.3.5-1.

Response 7Z: Section 3.3.5 of the NCC Final EIR/EIS provides a detailed discussion of Swainson’s Hawk present in the project area, potential impacts the project could have on habitat and on the species, and recommended minimization and avoidance measures to best protect the species. Compensatory mitigation was determined to not be appropriate since the project is not expected to have substantial impacts on Swainson’s Hawk or its habitat. A mitigation summary is available in Appendix F.

Response 7AA: The Crossroads West Specific Plan and the Bruinville Specific Plan were added to Table 3.6-1.

Response 7BB: Yes. Caltrans and the California Highway Patrol will have the jurisdictional responsibility for public safety services of the NCC.

Comment 8
Comment from the City of Oakdale

CITY OF OAKDALE
OFFICE OF THE CITY MANAGER
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September 19, 2017

Mr. Juan Torres
Senior Environmental Planner
California Department of Transportation
Central Sierra Environmental Analysis Branch
855 M Street, Suite 200
Fresno, California 93721

Subject: **Stanislaus County North County Corridor (NCC) – Comments on the New State Route (SR) 108 Project and Route Adoption Environmental Impact Report (EIR)/Environmental Impact Statement (EIS), dated August 2017**

Dear Mr. Torres:

The City of Oakdale appreciates the opportunity to review and provide comment on the NCC EIR/EIS. Since 2010, the City of Oakdale, along with the Cities of Modesto and Riverbank, County Stanislaus, StanCOG, and CALTRANS District 10, has participated in the North County Corridor Transportation Expressway Authority (NCCTEA) as a member agency. We appreciate the ongoing opportunity to continue to play an active role in the review and administration of the NCC in our county and community.

Similar to the City of Riverbank, the City of Oakdale continues to remain concerned regarding the potential transfer of any long-term liabilities associated with the future CALTRANS relinquishment of SR 108 to local government for management and maintenance. This of course includes any responsibilities for current and ongoing issues and potential storm drainage treatment necessary to satisfy the Regional Water Quality Control Board. 8A

In addition, this is of specific importance to the City of Oakdale within its City limits, west of the SR 108/SR 120 intersection. The City's 2030 General Plan designates this section of SR 108 primarily for commercial land uses, highlighted by existing commercial uses along this corridor and planned land uses for the adopted Crane Crossing Specific Plan. Thus, the City is concerned with the lack of analysis associated with the potential loss of commercial revenue associated with the relocation of SR 108 in the proposed locations. 8B

The EIR/EIS comments provided herein are organized into three (3) sections; Background, EIR/EIS Comments, and Conclusion.

Background:

On October 3, 2016, the Oakdale City Council discussed, deliberated, and received public testimony regarding the four (4) route alternatives considered in the NCC EIR/EIS. Upon receiving a significant amount of public testimony, the City Council, by a vote of 4-0, adopted Resolution No. 2016-117 (enclosed herein). In summary, Resolution No. 2016-117 offers preliminary support of alignment Alternatives 1B and 2B and adopts the following "guiding principles" when selecting the locally preferred alternative:

- An alternative that minimizes the number of homes/properties that need to be acquired;
- An alternative that does not tie into or terminate at a residential neighborhood;
- An alternative that routes a majority of NCC traffic around the Oakdale community;
- An alternative that has the least amount of impact to the City's General Plan and various Specific Plan documents; and,
- An alternative with no roundabout.

Resolution No. 2016-117 is enclosed herein, and the City respectfully requests that it be included in the administrative record prepared as part of the NCC EIR/EIS.

8C

EIR/EIS Comments:

Below are detailed comments prepared by City of Oakdale staff and as discussed with the Oakdale City Council, on the released NCC EIR/EIS, dated August 2017. Each comment below references the NCC EIR/EIS page number.

Pages 25 and 26

Pages 25 and 26 assume SR 108 improvements under the NCC "No-Build Alternative." These improvements include; Widening from Maag Avenue to Stearns Road from 2 to 4 lanes, and traffic signal improvements east of Oakdale at the intersections of Atlas, Dillwood, Stearns, and Orange Blossom Roads.

The City of Oakdale's adopted Streets Master Plan and Capital Facilities Fee Nexus Study includes the following improvements: Widening F Street from a 2 lane facility to a 5 lane facility from Maag Avenue to Atlas. The 5 lane facility allows for two travel lanes in each direction, and a middle turn lane.

It appears the NCC EIR/EIS omits these improvements.

8D

Page 31

Do the projected costs include Agricultural Mitigation Fees and mitigation fees for the loss of biological resources (i.e. sensitive species, etc.) habitat?

8E

Page 44

Reference is made to Figure 3.1.1.1-2, illustrating the pattern of land use within the "Affected Environment." While the Figure illustrates the Crane Crossing Specific Plan, East F Street Corridor Specific Plan, the Sierra Pointe Specific Plan, and the South Oakdale Industrial Specific Plan, it does not illustrate Future Specific Plan Area 5, which is discussed subsequently in the document on Pages 46 and 47. Future Specific Plan Area 5 should be included in Figure 3.1.1.1-2, and contemplated as part of the "Affected Environment" if it is not. The City also respectfully requests clarification if the NCC Traffic Model assumes the accurate amount and type of land uses within the City's future growth areas, including land use assumptions for the Future Specific Plan Area 5.

In addition, this Figure illustrates existing development, such as the Riverbank Industrial Complex. In this regard, this Figure, and the NCC EIR/EIS "Affected Environment" and subsequent environmental analysis should include existing developments in the City of Oakdale, such as the Blue Diamond facility and ConAgra. Both facilities are located within the City's industrial area, along S. Yosemite Avenue, near where future NCC connections are planned under Alternatives 1A and 1B.

8F

Pages 46 and 47

Table 3.1.1.1-1 – Future Projects depicts that the Sierra Pointe Specific Plan, East F Street Corridor Specific Plan, and Crane Crossing Specific Plan are "Future Project/Master Planned" while other projects such as the South Oakdale Industrial Specific Plan is noted as "Adopted."

The Sierra Pointe Specific Plan, East F Street Corridor Specific Plan, and Crane Crossing Specific Plan have all been adopted by the City of Oakdale. Thus, they should be referenced as "Pending Implementation." In the case of the East F Street Corridor Specific Plan, development within this Specific Plan has commenced, with the current development of an active-adult residential project known as Tesoro. The document should accurately reflect the current status of these projects. In addition, please note, this reference as "Future Project/Master Planned" for these Specific Plans is made throughout the document, and should be corrected.

8G

Page 76

This page provides a brief summary of future growth areas in the City of Oakdale, including the South Oakdale Industrial Specific Plan, Crane Crossing Specific Plan, Sierra Pointe Specific Plan, and Future Specific Plan Area 5. The existing status of the future growth areas is as follows:

- South Oakdale Industrial Specific Plan – The entire South Oakdale Industrial Specific Plan area is located within the existing City limits, and is zoned for Light Industrial and Limited Industrial land uses.
- Crane Crossing Specific Plan – A portion of this Specific Plan has been annexed into the City of Oakdale. The area noted as the "South Area" in the Specific Plan is within the existing City limits.

8H

- Sierra Pointe Specific Plan – As noted previously, this Specific Plan has been adopted by the City of Oakdale, and is a potential future annexation area.
- Future Specific Plan Area 5 – The EIR/EIS is correct that Future Specific Plan Area 5 contains approximately 707-acres, and is planned for a variety of land uses, including low, medium, and high density residential, commercial, parks, and an elementary school. The City's 2030 Oakdale General Plan (Pages LU-52 and LU-53) also notes the Specific Plan Area's importance to providing commercial opportunities and circulation connections to the NCC. In this regard, the City believes Alternative 1B provides this connection at Crane Road, achieves compliance with the City's 2030 General Plan, and preserves the City Council's guiding principles outlined in Resolution No. 2016-117.

8H

The document should be revised to accurately reflect the City's future growth areas as noted above.

Page 96

This page identifies "planned residential development areas in the vicinity of the proposed project" but does not include remaining residential development within the adopted Bridle Ridge Specific Plan, nor the Future Specific Plan Area 5. It is important to note that planned residential development within the Bridle Ridge Specific Plan include approved Tentative Subdivision Maps.

8I

The discussion referenced on this page should be revised to accurately reflect planned residential development for the City of Oakdale.

Page 105

The document states that Alternatives 1B and 2B would relocate 114 homes under these route alternatives. This represents the least number of homes that would be required to be relocated, as opposed to Alternatives 1A and 2A that will relocate 124 homes and 136 homes respectively. The City of Oakdale is in favor of a route alternative that results in the minimal number of homes and businesses that need to be acquired and/or relocated.

8J

Page 108

Table 3.1.4.1-10 – Business Affected by the Project

As noted previously by the City's comment above on Page 44, this table does not include business located in the City of Oakdale, notably businesses located within the City's industrial area along the S. Yosemite Avenue Corridor. The document should address how these businesses will be affected by the NCC.

8K

Conclusion:

The City of Oakdale again appreciates the opportunity to review and provide comment on the NCC EIR/EIS. Based on our review, the City believes Route Alternative 1B to be the preferred alternative and have the least negative impact on the goals and policies of the City's 2030 General

Plan. In addition, Route Alternative 1B achieves the "guiding principles" adopted by the Oakdale City Council as referenced herein.

Route Alternative 1B displaces the least amount of homes and businesses, as referenced throughout the EIR/EIS, notable Table 2.4-1, Comparison of Alternatives. Thus, Route Alternative 1B assists in minimizing relocation efforts and costs for homes and business affected by the NCC.

Route Alternative 1B also connects to the City's Future Specific Plan Area 5, along Crane Road, and the City's South Oakdale Industrial Specific Plan area. While as noted, the City's South Oakdale Industrial Specific Plan area is planned exclusively for industrial land uses. For the City's Future Specific Plan Area 5, the City's 2030 General Plan (Page LU-52) anticipates a commercial site along Crane Road to accommodate future connections to the NCC. Thus, Route Alternative 1B and its future connections to the City of Oakdale accommodates connections to existing and planned industrial and commercial land uses, thereby eliminating any connection to existing or planned residential neighborhoods.

Route Alternative 1B is primarily located south of the City's existing core, while providing connections for future growth areas of the City (as noted previously). Route Alternative 1B also provides its connection to State Route 120 near Lancaster Road. This alternative achieves this "guiding principal" simply by its design, by diverting traffic around the City of Oakdale, and connecting easterly of the Oakdale Community at Lancaster Road/State Route 120.

The City has reviewed Alternative 1B in comparison to its 2030 General Plan, the adopted Bridle Ridge Specific Plan, Future Specific Plan Area 5, the adopted South Oakdale Industrial Specific Plan, and the adopted Sierra Pointe Specific Plan. The City believes Route Alternative 1B has the least impact on these Policy documents, and in general, is consistent with these documents. While Route Alternative 1B provides connection to Crane Road (the westerly boundary of the Bridle Ridge Specific Plan), its connection point is south of this Specific Plan area, and is primarily located within the City's Future Specific Plan Area. As previously noted, the City's 2030 General Plan contemplated this connection, by providing land use guidance for this future Specific Plan area as it relates to the location of the NCC/Crane Road connection.

Concurrent with the adoption of the City's 2030 General Plan, the City adopted the Sierra Pointe Specific Plan, which is located in the eastern portion of Oakdale, along the State Route 120 Corridor. Land uses planned for this Specific Plan include General Commercial, Mixed Use, and Residential uses of varying density, among other land use classifications. Route Alternative 1B is consistent with the Sierra Pointe Specific Plan as it provides its connection point to State Route 120 easterly of the Plan Area. Thereby avoiding future planned land use, development, and growth contemplated under this Specific Plan. In conclusion, Route Alternative 1B allows the Sierra Pointe Specific Plan to be developed as adopted by the City.

Route Alternative 1B also provides a direct connection to the City's planned development within the South Oakdale Industrial Specific Plan. This connection will allow for the efficient transportation of goods and services between industrial users within the City to the State Highway 99 corridor. In its Summary, the NCC EIR/EIS states that part of the "Purpose and Need" for the

NCC is to *"support the efficient movement of goods and services throughout the region for the benefit of the regional economy by providing a more direct and dependable truck route, increasing the average operating speeds of all vehicles, and reducing the number of areas of conflict between motorized traffic and non-motorized means of travel"* and *"improve the efficiency of interregional travel by reducing travel times for long distance commuters, recreational traffic, and interregional goods movement.*

The City's South Industrial Specific Plan is a critical component to the City's existing and planned economic development. By providing this direct connection to the City's South Oakdale Industrial Specific Plan area, the NCC achieves its purpose and need by enhancing the efficient movement of goods and services, as well as enhancing the interregional economy.

We look forward to discussing the City of Oakdale's comments in the near future and in greater detail. Should you have any questions, please feel free to contact me at (209) 845-3574 or via email at bwhitemyer@ci.oakdale.ca.us.

Sincerely,

Bryan Whitemyer
City Manager
City of Oakdale

Enclosure: 2

cc: Oakdale City Council
Jeff Gravel, Public Services Director
Tony Marshall, City Engineer
Mark Niskanen, Contract Planner

IN THE CITY COUNCIL
OF THE CITY OF OAKDALE
STATE OF CALIFORNIA
CITY COUNCIL RESOLUTION 2016-117

A RESOLUTION OF THE CITY OF OAKDALE CITY COUNCIL PROVIDING PRELIMINARY SUPPORT FOR NORTH COUNTY CORRIDOR ALTERNATIVES 1B AND 2B AND ADOPTING GUIDING PRINCIPLES FOR SELECTING A LOCALLY PREFFERED ALTERNATIVE

WHEREAS, the City of Oakdale is a member jurisdiction of the North County Corridor Transportation Authority and City Staff have been actively involved in the development of the North County Corridor alignment alternatives; and

WHEREAS, City Staff has raised concerns regarding alignment Alternatives 1A and 2A, which both impact the City's General Plan and in particular, previously developed specific plans near the City's eastern border with Stanislaus County; and

WHEREAS, Residents have voiced concerns regarding alignment Alternatives 1A and 2A, as these two alternatives will have the greatest impact on homes and neighborhoods.

NOW, THEREFORE, BE IT RESOLVED that the **CITY COUNCIL** of the **CITY OF OAKDALE** hereby offers preliminary support of alignment Alternatives 1B and 2B and hereby adopts the following guiding principles when selecting the locally preferred alternative:

- An alternative that minimizes the number of homes/properties that need to be acquired;
- An alternative that does not tie into or terminate at a residential neighborhood;
- An alternative that routes a majority of NCC traffic around the Oakdale community; and
- An alternative that has the least amount of impact to the City's General Plan and various Specific Plan documents.
- An alternative with no roundabout.

THE FOREGOING RESOLUTION IS HEREBY ADOPTED THIS 3rd DAY OF October, 2016, by the following vote:

AYES:	COUNCIL MEMBERS:	Bairos, McCarty, Murdoch and Paul	(4)
NOES:	COUNCIL MEMBERS:	None	(0)
ABSENT:	COUNCIL MEMBERS:	None	(0)
ABSTAINED:	COUNCIL MEMBERS:	Dunlop	(1)

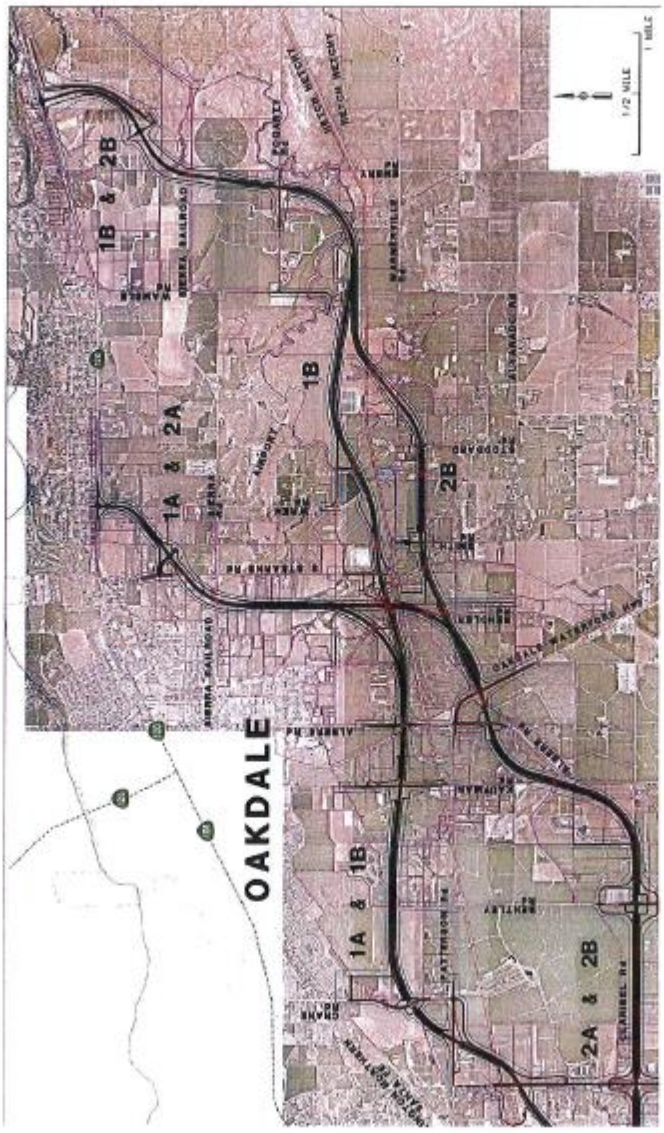
SIGNED:

Pat Paul, Mayor

ATTEST:

Kathy Teixeira, CMC
City Clerk

Exhibit A
Map of NCC Alternatives



IN THE CITY COUNCIL
OF THE CITY OF OAKDALE
STATE OF CALIFORNIA
CITY COUNCIL RESOLUTION 2017-115

A RESOLUTION OF THE CITY OF OAKDALE CITY COUNCIL APPROVING A COMMENT LETTER TO BE SENT TO CALTRANS REGARDING NORTH COUNTY CORRIDOR STATE ROUTE 108 EAST ROUTE ADOPTION PROJECT STANISLAUS COUNTY, CALIFORNIA STATE ROUTE 108 (PM R27.5/R45.5) AND STATE ROUTE 120 (PM R10.5/R12.5) 10-0S800; FINAL ENVIRONMENTAL IMPACT REPORT SCH NO. 2008201069

THE CITY OF OAKDALE CITY COUNCIL DOES HEREBY RESOLVE THAT:

WHEREAS, on October 3, 2016, the Oakdale City Council discussed, deliberated, and received public testimony regarding the four (4) route alternatives considered in the North County Corridor EIR/EIS; and,

WHEREAS, upon receiving a significant amount of public testimony, the City Council, by a vote of 4-0, adopted Resolution No. 2016-117; and,

WHEREAS, City staff has spent considerable time and effort reviewing and evaluating the NCC EIR/EIS; and,

WHEREAS, this review has determined that Route Alternative 1B is the preferred alternative for the City of Oakdale as it has the least negative impact on the goals and policies of the City's 2030 General Plan; and,

WHEREAS, the public comment period for the NCC EIR/EIS closes on October 16, 2017 and comment letters must be submitted to Caltrans prior to this date; and,

WHEREAS, City staff recommends that the City Council approve a comment letter that selects NCC Alternative 1B as the preferred local alternative and authorize the City Manager to send this letter to Caltrans.

NOW, THEREFORE, BE IT RESOLVED that the **CITY COUNCIL** of the **CITY OF OAKDALE** hereby approves a comment letter (Exhibit 1) and authorizes the City Manager to send said letter to Caltrans.

CITY OF OAKDALE
City Council Resolution 2017-115

THE FOREGOING RESOLUTION IS HEREBY ADOPTED THIS 18th DAY OF SEPTEMBER 2017, by the following vote:

AYES:	COUNCIL MEMBERS: Bairos, McCarty, Murdoch and Paul	(4)
NOES:	COUNCIL MEMBERS: None	(0)
ABSENT:	COUNCIL MEMBERS: None	(0)
ABSTAINED:	COUNCIL MEMBERS: Dunlop	(1)

SIGNED:

ATTEST:

Pat Paul, Mayor

Kathy Teixeira, CMC
City Clerk

I hereby certify that the foregoing is a full, correct and true copy of Resolution 2017-115 adopted by the City Council of the City of Oakdale, a Municipal Corporation of the County of Stanislaus, State of California, at a regular meeting held on the 18th day of September 2017, and I further certify that said resolution is in full force and effect and has never been rescinded or modified.

Dated: September 21, 2017

Kathy Teixeira, CMC
City Clerk of the City of Oakdale

Response 8 to City of Oakdale: Thank you for your comments; they have been included in the Final Environmental Document.

Response 8A: Consistent with the initial objectives of the NCC Project for the relinquishment of existing SR 108, Caltrans District 10 and cities of Riverbank and Oakdale and Stanislaus County will complete relinquishment agreements during the next phase of the project. It is anticipated that costs to bring the existing SR 108 to a state of good repair, including any improvements to storm drain facilities associated with Regional Water Quality Control Board requirements, will be a project cost.

Response 8B: Caltrans understands your concerns regarding this project and the potential for it to change the existing economic character of Oakdale. Exact changes to the economic character cannot be assessed; however, many project features have been designed to improve characteristics in the region. The project is designed to accommodate future population and economic growth in northern Stanislaus County that would presumably benefit businesses along the new corridor, as well as the existing SR-108. Implementation of the North County Corridor would benefit businesses in the study area and in the region by reducing travel times, increasing the average operating speeds, and improving travel time reliability. The project would also improve goods movement efficiency at a regional level, which would strengthen the agricultural and general economy of Stanislaus County. Section 3.1.1.1 of the EIR details coordination and analysis of frontage roads to adjacent properties.

Response 8C: The City of Oakdale's support of Alternatives 1B and 2B, and Resolution No. 2016-117, have been included in the Public Response to Comments section of the NCC project.

Response 8D: The City of Oakdale's adopted improvements for State Route 108 have been added to the No-Build Alternative discussion in Section 2.3.4.

Response 8E: The estimated project costs included in the environmental document include all environmental mitigation fees.

Response 8F: Future Specific Plan Area 5 will be added to Figure 3.1.1.1-2. The NCC specific traffic model is based on data from the 2011 Region Transportation Plan Travel Demand Model proposed by StanCOG. The 2011 Regional Transportation Plan Travel Demand Model included a wide range of data sources to project total regional traffic volumes such as regional growth, local populations, and commercial and residential development.

Figure 3.1.1.1-2 shows the planned land use and is not in reference to existing land use. Riverbank Industrial Complex is shown in the figure because it is not fully developed at this time. Therefore, Conagra and Blue Diamond facilities will not be added to Figure 3.1.1.1-2.

Response 8G: Sierra Pointe Specific Plan, East F Street Corridor Specific Plan, and Crane Crossing Specific Plan will be changed from "Future Project/Master Planned" to "Adopted" in Table 3.1.1.1-1.

Response 8H: Descriptions for the South Oakdale Industrial Specific Plan Area, Crane Crossing Specific Plan Area, Sierra Point Specific Plan Area, and Future Specific Plan Area 5 were updated.

Response 8I: Bridle Ridge Specific Plan and Future Specific Plan Area 5 were added to the list of planned residential development areas.

Response 8J: The City of Oakdale's preference for Alternatives 1B and 2B is noted and is included in the Response to Comments of the NCC project.

Response 8K: The businesses included in Table 3.1.4.1-10 include only those directly impacted through right-of-way acquisition by the proposed project.

COURT REPORTER COMMENTS

Comments 9 through 32
Comments received via court reporter during Public Hearing

PUBLIC HEARING

NORTH COUNTY CORRIDOR

September 7, 2017

Gene Bianchi Community Center

110 South Second Avenue, Oakdale, CA

PRIVATE COMMENTS

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1. Debra DeShon

5404 Epperson Court, Oakdale

(209) 853-2812

So I just want to say that 1-A and 1-B affect our property. Our parcel number is 062-025-023, and you're proposing to put an access road directly behind our property and funneling out in the court in front of our house. And basically, most of the traffic that will be on that will be large farm trucks. And I'm wondering if they do do it, if there's going to be improvements to the court itself going to Langworth. And so I'm against 1-A and 1-B. 9

2. James DeShon

5404 Epperson Court, Oakdale

(209) 613-5368

First, I am a new land owner to this area, but I did not receive any notification of this meeting until I saw it in the local newspaper. So I feel that some type of notification to all the affected property owners should have been sent out prior to this meeting.

If reducing traffic congestion and improving traffic flow, and thus improving air quality, are the goals of this project, then I would be able to support plan 2-B. Also, after reviewing all the plans available today, I feel that plan 1-A and 1-B would cause the greatest conflict, more with the existing major power lines, for example, leading from Hetch Hetchy and the Sierra Railroad tracks that are located in the area. 10

As a result of this initial examination of the plans available to me tonight, I could support plans 2-A. And preferably 2-B, would be my first choice. And I would activelywork against plans 1-A and 1-B.

3. David Hendricks 11

1966 Alta Court, Oakdale 95361

(209) 848-4803

Nobody seems to know how much this is going to cost for the alternatives. How can you make a decision if you don't know the cost? I've lived here for 11 years; country people don't know how to drive through roundabouts.

I left San Jose 11 years ago. It was orchards when I moved in in 1958, when my folks did, and it became a jungle of cement and asphalt. And I moved out here in the country to be in the orchards again. And this is going to turn into another jungle of asphalt and concrete.

You know, I know this project has been on the books for a long time, and I understand about progress. Some of their people that I've talked to tell me, "It's going to help your grandchildren." And I don't see how turning the orchards that I grew up in into cement jungles is going to help my grandchildren.

And I still want to know when we're going to build a bullet train from San Francisco to LA that we start in Fresno to Madera. The biggest problem in this extension of freeways that limit congestion needs to be on the Altamont Pass on 580 going from the Bay Area out here to the valley. And if they want to spend any money, they ought to start doing something with that before they worry about the traffic in downtown Oakdale and Riverbank to alleviate congestion.

My doctors were in Stanford Hospital; I had a heart transplant three years ago. If I leave at 4:00 in the morning, I can make an 8 o'clock appointment. If I leave at 6:00, I'm lucky to get there by 11:30 or 12:00. That's the congestion that needs to be addressed, not an expressway to bypass Oakdale and Riverbank. And I asked people who the project was to benefit, and it seems to be from people going from the Bay Area to Yosemite or the mountains and stuff. And I don't see how it's going to help people living around here with the congestion on 580 and 205.

4. Larry Nydahl

11

12

5936 Claribel Road Oakdale

(209) 996-5776

I'm recommending 1-A and 1-B. The reason why is that goes up closer to Oakdale. It will impact the less population. If they go down Claribel to Albers, it's like 50 to 55 homes it will affect. If they go the other way, it's probably 15, 20. And if you go up that way, it's going to be a lot longer before our farmland is taken up. If you go Claribel, it's further from Oakdale. It's going to be just like the Manteca bypass up here, the 120 bypass; it's going to be Walmarts and Bass Pros all the way out to Claribel within 20 years. I'd appreciate it if they'd go the upper route, the northern route. 12

5. James Godkin

837 Townhill Avenue, Oakdale

(510) 747-9959

We're adamantly opposed to any 1-A or 2-A. No As at all. We want 1-B or 2-B. And the reason for that, it impacts way too many people if they go anything outside of 1-A and 1-B. The cost is just prohibitively more expensive.

We bought the property in retirement. As a result, they're taking our retirement dream away. It's a dream that we've had, to move out here, and now it's being dashed. And we've been to many meetings, every meeting possible here. And we just need an answer because we're trying to develop our property. And there's no point in pouring money into developing our property if it's basically going to be destructed. We were never told anything. 13

The big problem right now is nobody knows what they're doing. Caltrans doesn't know what's going on, and the Cities don't, and the County doesn't. It's almost like being tortured. What we're going through is like a torture. And I hate to put it that way, but it's kind of what it feels like. If they'd make a decision, just shoot us and get it over with, it'd be fine; but they're dragging this thing

out. It's a slow bleed, basically, is what it comes down to. We're desperately asking them not to take our property. So, please go 1-B or 2-B, but definitely no As. No way with A. 13

6. Dave and Linda Kline

4336 Claribel Road, Modesto 95357

(209) 480-4561

Parcel Number 014-001-011

That little access road, the access road comes right on our property, like right down the property line. And next to us is open field. We are asking that the access road that goes to the cul-de-sac to the houses near us be pushed over 20 or 50 feet more towards the open field rather than right smack on our house. 14a

Because our house is not, what, 20 feet from the property line. It's real close to that side of the property line. And they're showing the road going right next to us, and then it's open field on the other side. So we're just asking that the access road from Claus to our little cul-de-sac and then Claribel -- so it's the access road to Claribel -- would be adjusted easterly as much as possible.

And if we had a vote, we would vote for 1-A or B, because we have 30-year-old trees in the front of our house. I don't know if there's an option of not taking those or if they have to go. But if they have to go, they have to go. But it was the adjusting this way. B takes a lot more of our property, the corner. 2-A or 2-B takes more of our – and I've got roses my kids gave us, and my son is no longer with us. The trees, they're just big, old trees. I can't claim that they're the kids' Christmas trees. I'd be lying. So that's it, if they would consider that in the final design. But I'm thankful that the house is staying. 14b

7. Darla Wincentsen

3961 Davis Avenue, Modesto 95357 15a

(209) 345-0558

Davis Avenue at Claus Road is going to have a cul-de-sac at the end of it, according to the plans here. The first problem I have with that is that Davis Avenue floods continually in front of our house. It's flooded every year. Whether it rains, whether it's irrigation water, whatever, it floods. Right now, the County has dug some trenches down to Claus Road for drainage. If we're a cul-de-sac there, my concern is what's going to happen. There's no drainage to Claus Road that way, so we're going to be sitting there with a swimming pool in front of our house at the end of a cul-de-sac? I don't know. So that's a major concern for us, is the flooding on Davis Avenue. We've heard there aren't going to be any road improvements. That's a problem. Okay, that's one. 15a

Number 2, the plan over there shows that Claus Road is going to change our property line to cut right down the middle of an existing shop that has been there for 15 years or more. We have a huge 40-by-60 shop. And it goes right down the middle of our shop. My husband talked to someone at the last meeting two years ago, and they actually came out and looked at the area and said to him, "This won't happen. We'll make sure this won't happen. We'll adjust it. We won't take your building." So that's a big concern, huge concern -- a $75,000 building. I'm going to cry. Yeah, big concern because you're going right down the middle of our building. So those are my concerns. 15b

I don't know what's going to happen with the railroad tracks at -- I'm going to assume that -- I can't tell, but I'm going to assume that there's going to be overpasses at the railroad tracks, which, driving on Claribel Road all the time, it won't do any good to have an overcrossing at the railroad tracks unless there are also improvements made all the way down Claribel. Because there's going to be a backup. Right now, there's huge backups at Roselle all the time in every direction when school lets out. There's huge traffic backups there. So improvements will have to be done. Overpasses or stoplights or something will have to be done at every one of those intersections in order to make anything work feasibly. Otherwise, we're all going to be sitting in traffic like we do now, and that's not good. 15c

So basically, the two big concerns are the building, the property line going right down the middle of our building. And the second big concern is the flooding in front of our house and the drainage to Claus Road if they make that a cul-de-sac at the end of our road. 15c

8. Alfred H. Burtschi

9113 Alvarado Road, Oakdale

(209) 847-2661

My concerns are with 2-A and 2-B. They cut my property off by 25 to 30 percent. And my deep wells and diesel pump and filtration system will be on the north side of the corridor, and the rest of my orchard will all be on the south side of my orchard. So I will not have any access to the deep well or diesel pumps if 2-A and 2-B go through. I would prefer 1-A and 1-B because of the situation. 16

In losing 20 to 30 percent of my 80 acres, I would lose my potential crop for my trees for a substantial amount of time, and it will make my farming gross revenue be a lot less.

Hopefully we can resolve this and if anybody has any questions, they can give me a call. I just think this would be a little bit of a hardship on my trees since I've invested a lot of money in planting of all these trees. And counting on 80 acres instead of 60 or 65 acres, the gross profit per year is a little bit discouraging.

9. John Crim

10306 Dixon Road

(209) 847-5819

My wife, Tammy Crim, and I are very much in favor 2-B as our first choice. Just because, if there's not as much traffic. Property values were a concern a long time ago, a sound wall was a problem for me. All the trucks and heavy traffic coming down the road and trying to slow down in 17

that turnaround, it just wouldn't work. Plus, I found out they were going to have to raise the surface of the highway something in the neighborhood of 10 to 12 feet. I don't understand that.

So we like 2-B as our first choice and 1-B would be our second choice. And we are not in favor of the As at all. It would be right there in our backyard. And that would just kill our property value. 17

I wish somebody would have taken a look at Warnerville Road. I'm sure they did somewhere along the way, but that just seems to connect right along with Claribel. And it would have taken it all the way out, and still you could have cut in wherever you wanted to. I'm sure the people of Lancaster are not happy about this either, but it's got to go somewhere.

10. Hans Burtschi

6466 Bendler Road, Oakdale

(209) 485-0104

I feel 1-A and 1-B are the better routes to pick. But the extension on Bendler Road itself is not necessary because you could find access -- shorter routes than using the whole road of Bendler and extending Bendler Road. 18

11. Mike Musick

6349 Smith Road, Oakdale 95361

(209) 404-3675

I'm concerned about the main reason for the bypass coming south of Oakdale when, after living here since 1957, all the traffic has come from the north side of Oakdale and come from Manteca and the Bay Area to the foothills and to the lakes and stuff in the Sierras. 19

The routes that they have now for a bypass that are in the south side of Oakdale, the ones that I see that are -- that would be as acceptable as they could be are 1-A or 1-B.

I cannot imagine why they would spend almost a billion dollars -- $800 million. I can't imagine them spending the money that they're going to spend that's not going to alleviate a traffic problem for a bypass. And my concept of a bypass is to alleviate traffic congestion. And only the north side would alleviate the congestion, in my opinion. 19

12. Pauline Ferguson

10813 Bond Road, Oakdale

(209) 847-9309

We were discussing about we would probably be in the 2-B part of it, and I don't like it. We've been there for 31 years. It's been nice and quiet. We don't want a bunch of traffic. But this part that I was discussing with the lady, she said I would have dead ends here where the traffic would not be coming through Stoddard Road. It would be blocked, and they would be using the bypass and we would not be affected. So on my part of it from where we live, it seems fine because I'm further back away from the new project. 20

What I like about it is the dead ends, and that's about it. I don't like having anything with a bunch of traffic. That would certainly be what we would hear all the time.

13. Scott Nelson

4823 and 4825 Roselle Avenue

Modesto, California 95357

(209) 534-8037

I'm the lead pastor of Covenant Grove Church that is at those addresses. And since we've moved in, our church has grown from 150 to over 300 people on a Sunday morning. When we first moved in, we were told that the environmental study wasn't going to greatly impact our land, and now we're kind of being told that it's going to. 21

So the first thing is we're hoping to keep our buildings because the line goes right through the middle of the building right now, and we hope to move it down a little bit, and then, if possible, to have as much access to the south part of the property as possible, the 4823 property. And then -- oh, yeah. I want to add one more thing. We also want to make sure that we continue to have a left-turn access into the property from Roselle Avenue. 21

14. Robert Lawrence

10248 Buck Meadows Drive, Oakdale

(209) 848-1989

My feelings are that the Route 2-B is the one I'm in favor of. My basic comments are I would prefer that Claribel continued straight all the way out to where they have the existing four lanes. And that's just past the 50's Diner. That way, it will alleviate. When you join at Lancaster, you immediately have to go into all of the turns where it's two lanes, and that's where the majority of the accidents happen on 120/108. 22

15. Thomas Epperson

4501 Epperson Court, Oakdale

(209) 869-3219

There's several, but the ones that I like that would -- these two would eliminate everybody on that court, those four houses on the court that I live on. It would eliminate that because of that access road, 2-A and 2-B. The only difference between those, they're both the same where it goes across. These are the ones I like because they stay up, like down toward Claribel. And they don't -- they're about a mile away versus going right over the top. And of course both of those, 2-A and 2-B, both come out east of Oakdale. They continue down Claribel quite a ways before they make the swing to east Oakdale. 23

So that's -- did I explain it right? 1-A and 1-B, both of those would eliminate, you know, our property. We're not big farmers. We've got three acres a piece. It's been a nice, quiet place to raise kids. It's a cul-de-sac, so there's just one way in and one way out, and the street is less than 100 yards. And so 2-A and 2-B would affect less property and houses, you know, less disturbed -- eliminated. 23

16. Ester Epperson

5401 Epperson Court, Oakdale

(209) 869-3219

2-A and 2-B is our preference for the -- because the other ones will go right through our property, right through. That's it. 24

17. Jerry Fouts

9937 Poppy Hills Drive, Oakdale

(209) 681-5613

I'm vehemently opposed to bringing North County Corridor north. The best alternative should have been Warnerville Road to Willms Road. That is true planning. Any other alternative is planning to bring bad air, congestion, and danger to my family and the families near the proposed Atlas outlet for the North County Corridor. 25

I wish somebody would stand up and raise their hand and tell me whose idea it was in 2010 to come north through my neighborhood, just somebody. I have called the county; the county says it's the state's idea. I called the state; they said it was the county's idea. And now my home values and my family's health is at risk for no good reason. This is not planning. This is a disaster. And I will fight it till my dying day.

18. Tom Washburn

867 Townhill Avenue, Oakdale 26

(209) 847-1050

Okay. I don't want 1-A or 2-A because it's going to take my house out, my property, and it's too close to town. And they're going to have the same thing as what they did in Sonora. Ten years later, they had to spend millions to extend the thing they already did once because it was brought out too close to the county of Sonora. And I'm in favor of the other route that takes it further out by Lancaster, which would be the -- what is it? 2-A and 2-B. 26

19. Curt Porter

305 South Stearns, Oakdale

(209) 480-4080

Well, you obviously want to know the route that we're going to be taking. So we're not for the South Stearns route. So we've been dealing with this for about six years now, since we got involved, and we never thought in our wildest that the city would be wanting to put a road through our house. We're set about 1200 feet off the road. We're kind of in our own nice little haven back there. Somehow or other, the road has found our house. So, no, we're not happy about that.

And we've tried to take a stand against this whole situation, and it's been looming over us for the last six years. Do we make more home improvements, or do we just kind of let things sit idle? It really puts a damper. We couldn't sell the place right now if we wanted to. Maybe we could give it away, but I don't think we could sell it. So it's pretty heart-wrenching. We're having a hard time with it. 27

Anyway, with all that being said, we don't want the road there. Most of our neighbors don't want the road there. It needs to go farther east near Wamble Road, the far easterly route that they're looking at. I just really firmly believe that our identity on Stearns Road is way more important than what you're going to find -- shrimp or cell matters that they're testing for in the ground. We've got

14 years invested in our place that we've put a lot of money into development. And to have the thought of a road come through to take that away from us, it doesn't seem right.

I really, truly believe that by them choosing Stearns Road, if they did, that would put a total cap on the city of Oakdale for future growth. It doesn't seem smart. It seems as though we should go easterly to give the city more room to grow. There's a lot of agricultural land up there that could go into areas like Del Webb development, things like that.

And of course that horror story of that North County Corridor on the north side that got abandoned. We still hear stories in Oakdale that those people basically lost their homes. And the story goes that Caltrans is now renting those houses back, in some cases, even to employees, for hardly next to nothing. We're hearing comments, you know, from individuals on the board of North County Corridor that, you know, they now have those homes on the north side that they can sell for a great profit. And doggone it, I want to take a stand and say if somebody's going to sell my property for a good profit, I want it to be me and my family, not some county official. So I hope and I pray that they will listen to us. It's hard. All right. Thank you.

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20. George Hansen

725 Townhill Road, Oakdale, California

(209) 847-7392

It concerns Map Number 16, routes 1-A and 2-A. And we would be a partial acquisition, according to their maps. My concerns are on the northeast corner of our property, there's an old OID improvement district 31 deep well, irrigation well. It is in the right-of-way of what they have proposed. All the properties, let's see, on the east side of our property going south irrigate away from the proposed road. If they change -- and there is -- let's see, how do I say this? There is an OID main irrigation line running southward from the northeast corner of our property southward that all the properties irrigate off of. If the road moves or the right-of-way moves that irrigation

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mainline, it would totally devalue all those properties because they would have to relevel everything to set up a new irrigation schedule or a new way to irrigate because they're irrigating away from the proposed road map, the way they have it showing now.

And my concern is that if they only buy a portion of the property, but yet you have to relevel the rest of it in order to irrigate, they're not paying you for having to do all the extra work to relevel the property in order to irrigate and keep the value of it. And if they only take a portion of it, it devalues the rest of the property.

That would be our main concern, I guess, is the method and the changing of all the irrigation, the flow of water. And it changes the whole flow of water and the way that everyone irrigates on all that road right-of-way, that the proposed right-of-way 1-A or 2-A. But all the mainline runs from north to south right along all those properties. When you take that mainline out, they can move a line over, but then you have to relevel everything to keep the value of your property. Otherwise, it just dries up, and you lose the value of your property.

We have trees, we have almond trees, on the two parcels of ours that are affected. I guess that would be our main concern. There is an OID improvement district deep well on -- it would be the northeast corner of our property. It's just off our property. And that deep well would have to be moved, obviously. And then you're talking big dollars for moving wells. They obviously can't move them. And they'd have to redrill a new one.

21. Sue K. Field

9700 Partridge Court, Oakdale -- actually we're in east Oakdale, not in the city itself. That may be important.

(209) 845-9093

My concern is that they are bringing four lanes of highway onto one existing, 120/108 going east towards Jamestown, onto that particular stretch of road. 108/120 east toward Jamestown has an

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accident almost daily. It has some very bad road. They are not planning to fix that in any way. He tells me they are dumping 8,000 cars opening day onto the traffic circle, which will be four lanes of cars coming to two lanes of cars going 60, maybe, hitting a road that isn't fit for 50. And I think that it is -- "criminal" seems like too big a word, but it is something they should at least think about before they do it.

It's true, I'm in a neighborhood that will have trouble going to Oakdale if they put that much traffic on those. Those are the -- where you get off your road onto the highway. I'd much rather have an onramp for Knights Ferry, for Orange Blossom Road, and all the houses on Orange Blossom. They have Sunset Oaks -- there are three or four tracts of homes there, not huge numbers. But they will also be forced to drive through neighborhoods and go to a very bad -- to even get on the highway without fighting all the traffic. And I do think that it's shortsighted of Caltrans not to make a bigger study of the impact of traffic. Thank you. 29

22. Joseph Collins

5931 Claribel Road, Oakdale

(209) 541-4180

I was wanting to put my -- I would rather see 1-A or 1-B because it would affect less people. Otherwise, you have take my home or whatever if they go down that direction. 30

That's it. Thank you.

23. Matthew Steinberg and Joy Bloomingcamp

10528 Highway 120

Oakdale, California 95161

010-022-005. L and R turns. Here's the background: In 1959, Caltrans took the frontage of the property, and they've done nothing with it. Okay? And so we've lost the ability to farm that land for 60 something years or whatever it is. Okay. What we need -- there's land there for a left-turn lane 31

coming from the east, and we need access from our property when we go out to Highway 108 to make a left turn. So we need left-turn lane access, and we need left-turn access from the property onto -- so that our property accesses north, and we would make the access when turning west.

And we have a business on the property. And as she said, the reason they need the left one is access, but we also have a business on the property which would require access. So if they go forward with the project, we want to make sure that we have good access to the property from all directions, east and west. 31

24. Vicki Godkin

837 Townhill Avenue, Oakdale

(510) 747-9959

I, and my family, are adamantly opposed to 1-A and 1-B. And 1-A and 1-B affects far too many people. For us, we came from the Bay Area to get away from traffic and the noise. We bought our property in retirement. We're making changes, spent hundreds of thousands of dollars improving farmland. We're right at the cusp of doing a remodel. Now what do we do? It's extremely frustrating. It's one of these things that I don't know when plans like this are developed, if they actually consider the human impact. What do we do? Will we be able to sell our property? Will we lose money? We're not working any longer, so it's going to affect us deeply and many, many of our neighbors. 32

Again, no 1-A and 1-B. We were never told anything about this NCC when we bought the property, nothing. And afterwards, the engineers at Caltrans said, "You know, we realized we didn't inform the property owners." We would never have brought our property had we known what the possible plan would be for the NCC.

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Response 9 to Debra DeShon: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The proposed project design does not currently include work from Epperson Court leading into Langworth Road. However, improvements to the south, southwest, and southeast portions of Epperson Court are currently proposed as part of this project. Please refer to Figure 2.3-1 of the NCC Final EIR/EIS.

Response 10 to James DeShon: Thank you for your comments; they have been included in the Final Environmental Document. Your property has been identified as having potential partial acquisition to accommodate realignment of Epperson Court.

Response 11 to David Hendricks: Thank you for your comments; they have been included in the Final Environmental Document.

The Summary of Major Potential Impacts from Alternatives located in the NCC Final EIR/EIS Vol. I (page iii) provide the following costs for each of the proposed project alternatives:

Potential Impact	Alternative 1A	Alternative 1B	Alternative 2A	Alternative 2B	No-Build Alternative
Cost	$660 million	$688 million	$676 million	$699 million	None

Traffic conditions, field observations, analysis, and discussion of traffic congestion and the need to alleviate such conditions are explored further in Section 3.1.6 Traffic and Transportation/ Pedestrian and Bicycle of the NCC Final EIR/EIS. Traffic through the NCC is a combination of commuter, local, commerce, and goods movement, and a large component of recreational traffic. This traffic currently conflicts with local traffic on State Route 108, creating congestion and safety concerns, as well as noise and air pollution issues. These conditions are expected to worsen over time as development continues and traffic increases in the region.

Response 12 to Larry Nydahl: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 13 to James Godkin: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 14 to Dave and Linda Kline,: Thank you for your comments; they have been included in the Final Environmental Document.

Response 14A: During final design and right-of-way negotiations, potential options such as minor modifications to the design to address these concerns will be analyzed by Stanislaus County and Caltrans.

Response 14B: The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Final acquisitions and relocations will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project.

Response 15 to Darla Wincentsen: Thank you for your comments; they have been included in the Final Environmental Document.

Response 15A: This information regarding flooding issues will be passed on to Stanislaus County. The NCC project includes detention basins and other drainage improvements to accommodate the additional surface runoff. Road improvements are proposed at the eastern end of Davis Avenue (at its intersection with Claus Road), as well as a small section of Davis Avenue between Terminal Avenue and Claus Road. The design will take drainage into account when determining necessary features such as basins or roadside ditches at this location.

During final design and right-of-way negotiations, potential options—such as minor modifications to the design to address these concerns—will be analyzed. Potential modifications will be further analyzed during final design and right-of-way negotiations.

Response 15B: Final acquisitions and relocations will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project. Images presented at the public meeting were the best representation of what the project may impact; however, precise survey data taken from the field would be used to determine the exact impacts on property.

Response 15C: Please refer to the *Final Traffic Operations Report for the North County Corridor* (March 2015) for the traffic analysis and report of the project area. This study indicates that the NCC will cross over the existing railway lines at the intersection of Claribel Road and Terminal Avenue with a grade-separated overpass. Also, the traffic study found that no additional improvements are needed because the intersection will operate at an acceptable level in the future.

Response 16 to Alfred H. Burtschi: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The local jurisdictions (City of Modesto, City of Oakdale, City of Riverbank, and Stanislaus County) unanimously support the selection of Alternative 1B as the locally preferred alternative.

Response 17 to John Crim: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has

recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The surface of the highway will be elevated at overcrossings because local roads will pass under the elevated structures; however, the roadway elevation will be slightly elevated compared to the existing roadways.

Response 18 to Hans Burtschi: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 19 to Mike Musick: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The four proposed Alternatives—1A, 1B, 2A, and 2B—have been determined to alleviate traffic congestion along the existing State Route 108 and State Route 120 routes. Please refer to Section 3.1.6 – Traffic and Transportation/Pedestrian and Bicycle of the Final Environmental Document for more information regarding the traffic data analyses used to address traffic-related issues for each of the proposed routes.

Response 20 to Pauline Ferguson: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The local jurisdictions (City of Modesto, City of Oakdale, City of Riverbank, and Stanislaus County) unanimously support the selection of Alternative 1B as the locally preferred alternative.

Response 21 to Scott Nelson/Covenant Grove Church: Thank you for your comments; they have been included in the Final Environmental Document.

Final acquisitions and relocations will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project. The project team's response indicated the preliminary design did show an impact to property; however, the design would be reviewed to seek ways to minimize or eliminate any impact to the church property.

Response 22 to Robert Lawrence: Thank you for your comments; they have been included in the Final Environmental Document.

Response 23 to Thomas Epperson: Thank you for your comments; they have been included in the Final Environmental Document.

Response 24 to Ester Epperson: Thank you for your comments; they have been included in the Final Environmental Document. While Caltrans acknowledges your alternative preference,

the North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 25 to Jerry Fouts: Thank you for your comments; they have been included in the Final Environmental Document. Prior to in-depth analysis of the four proposed Alternatives 1A, 1B, 2A, and 2B, 18 other alternatives were considered in an Alternative Analysis Report; however, they were eliminated due to the excessive environmental impacts that would have been caused from their selection. Section 2.6 of the FEIR/EIS contains information regarding these 18 other alternatives, and the rational behind their elimination from further consideration. Alternative 1B was chosen as the preferred alternative. Other alternatives were dropped as they did not meet the purpose and need.

Response 26 to Tom Washburn: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative, which takes the alignment out to Lancaster Road.

Response 27 Curt Porter: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS and takes the alignment further out to Wamble Road and up to Lancaster Road, thus avoiding the South Stearns Road community.

Response 28 to George Tim Hansen: Thank you for your comments; they have been included in the Final Environmental Document.

The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS. As a result, it is not anticipated the proposed project will affect your properties.

For properties impacted by the project, right-of-way acquisition will take into account potential additional and specific impacts to the property and will be addressed and/or fairly compensated for by Stanislaus County and Caltrans during the final phase of the right-of-way negotiations. Also, the parcels will still be required to have irrigation, even after acquisition, and Stanislaus County and Caltrans will be responsible for any new irrigation required as a result of the proposed project in this area.

Response 29 to Sue K. Field: Thank you for your comments; they have been included in the Final Environmental Document.

The following information was added to the Final Environmental Document in Section 3.1.6 – Traffic and Transportation/Pedestrian and Bicycle:

An Intersection Control Evaluation (ICE) summary, per Caltrans Policy Directive 13-02 (Traffic Operations Policy Directive), was performed at each of the proposed at-grade state highway intersections to identify the most effective intersection traffic control strategy (i.e., roundabout or traffic signal). Signalized and Unsignalized Intersection Design and Research AID (SIDRA) software package operations tools were also used for assessing effectiveness of roundabouts at the proposed intersections.

An evaluation of all applicable warrants has been conducted, and additional factors (e.g., congestion, approach conditions, driver confusion) were considered before the decision to install a signal was made. Detailed signal warrant calculations are provided in Appendix L of the *Final Traffic Operations Report for the North County Corridor* (March 2015) for the traffic analysis and report of the project area. This report encompasses an analysis and discussion of existing traffic operations and impacts as well as those related to each of the proposed alternatives within the project description.

Roundabouts were selected through the Intersection Control Evaluation (ICE) summary, per Caltrans Policy Directive 13-02 (Traffic Operations Policy Directive), which continue to operate at an acceptable level of service in the future (2042), and the roadways have sufficient capacity for the future volumes of traffic.

The project was proposed by the project development team (PDT), which is composed of members from Caltrans District 10, Stanislaus County, the cities of Modesto, Riverbank and Oakdale, and engineering, environmental and public relations consultant members.

Prior to analysis of the four proposed Alternatives 1A, 1B, 2A, and 2B, and the selection of 1B as the preferred alternative, 18 other alternatives were also considered in an Alternative Analysis Report; however, they were eliminated due to the excessive environmental impacts that would have been caused from their selection.

As part of the Alternative Analysis Report, the alternatives were screened through a preliminary screening process that focuses on determining if a specific alternative will meet the 2030 traffic needs and if any major engineering considerations would affect the safety or function of the facility. From this preliminary screening, 18 alternatives were considered during the alternative screening process.

Seven broad-based criteria of the Project Development Procedures Manual were used to screen the initial Build Alternatives. These criteria include the following:

- Purpose and need: Would the alternative meet the project’s purpose and need?
- Excessive project cost: Would the alternative result in a substantially higher overall cost?
- Relocations and acreage: Would the alternative require excessive removal of businesses, residences, or urban or rural acreage?
- Operational or safety problems: Would the alternative result in operational or safety problems?

- Adverse social, economic, or environmental impacts of extraordinary magnitude: Would the alternative disrupt or divide an established community or result in economic or social impacts?
- Cumulative impacts: Would cumulative impacts result due to relocations, operational or safety problems, or social, economic, and environmental impacts?
- Rejected at an earlier stage: Was the alternative rejected at an earlier stage of project development?

Ultimately, the four chosen alternatives were found to best meet the purpose and need of the NCC project. Please refer to Section 2.5 of the Final NCC Final EIR/EIS for more information regarding all alternatives explored.

Response 30 to Joseph Collins: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 31 to Matthew Steinberg and Joy Bloomingcamp: Thank you for your comments; they have been included in the Final Environmental Document.

If the accessibility requests are feasible for the location, they will be taken into consideration and addressed during the final design of the proposed project. At this time, however, no turn lanes along State Route 108 are proposed as part of the project. Additional improvements along existing State Route 108, including turn lanes, may be considered in the future.

Response 32 to Vicki Godkin: Thank you for your comments; they have been included in the Final Environmental Document.

The proposed project was designed with input from the community. The project development team (composed of members from Caltrans District 10, Stanislaus County, the cities of Modesto, Riverbank and Oakdale, and engineering, environmental and public relations consultant members) conducted and participated in a number of community outreach meetings with the general public, public entities, and interested stakeholders since 2011 in a comprehensive effort to gather input and comments from people in the surrounding communities.

During scoping of the corridor, two public scoping meetings, eight community focus group meetings, and six public information meetings have occurred between September 2010 and March 2014. Also, one environmental focus meeting related to the environmental document occurred on March 6, 2014. Two more public information meetings related to the environmental document were held in October and November 2014. Announcement of these public meetings was made in both English and Spanish through mailed postcards, public notices placed in newspapers, and news releases.

For additional information, please see Chapter 5 of the environmental document, which identifies all project-related coordination efforts.

We understand your concerns regarding this project and the potential for it to change the existing character of your neighborhood.

The Caltrans Relocation Assistance Program (RAP) is based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and Title 49 Code of Federal Regulations Part 24. The purpose of the Relocation Assistance Program is to ensure that persons displaced as a result of a transportation project are treated fairly, consistently, and equitably so that such persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole.

In accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, your Relocation Advisor will provide specific information regarding comparable, functionally equivalent decent, safe and sanitary properties that are available for purchase. Such information will be provided in writing at least 90 days prior to any requirement to vacate the displaced property. As part of this process, we encourage displacees to advise their assigned Relocation Advisor of any concerns and special needs warranting consideration in the selection of potential replacement properties. These factors will be considered to the greatest extent possible under existing law. Exact changes to individual property values cannot be assessed; however, many project features have been designed to improve characteristics in the region. See Appendix E of the NCC Final EIR/EIS for a summary of the Relocation Assistance Program.

You can find additional information on the Relocation Assistance Program at: http://www.dot.ca.gov/hq/row/. Under Publications, you will find the following:

- Relocation Assistance for Residential Relocations
- Your Property, Your Transportation Project

These publications augment the information contained here and may provide another source of valuable information that could assist you in discussions with your assigned Relocation Advisor who will be integral in guiding you through this process to ensure that you receive all benefits for which you are entitled.

PUBLIC COMMENTS

Comment 33
Comment from [No Name]

Caltrans

North County Corridor

108

Name (Please print): _____ Date: _____

Mailing address: _____

Phone: _____ Email: _____

☐ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

ALTERNATIVES 1 IS MY RECOMMENDATION, FINANCIALLY ~~ESP~~ IS THE LEAST EXPENSIVE AND AFFECTS THE LEAST AMONT OF BUSINESSES. IT ALSO IMPACTS LESS HOMES AND PROVIDE THE GREATEST DAILY TRAFFIC VOLUME REDUCTION.

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 33 to [no name]: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 34
Comment from Ctvrtlik

From: Magsayo, Grace B@DOT
Sent: Monday, August 14, 2017 10:40 AM
To: jeff@jbpartnersllc.net
Cc: Torres, Juan@DOT <juan.torres@dot.ca.gov>; Matt Satow (msatow@drakehaglan.com) <msatow@drakehaglan.com>; Kismetian, Anton@DOT <anton.kismetian@dot.ca.gov>
Subject: 10-05800 Call from Mr. Jeff Ctvrtlik re 4628 Claus Road

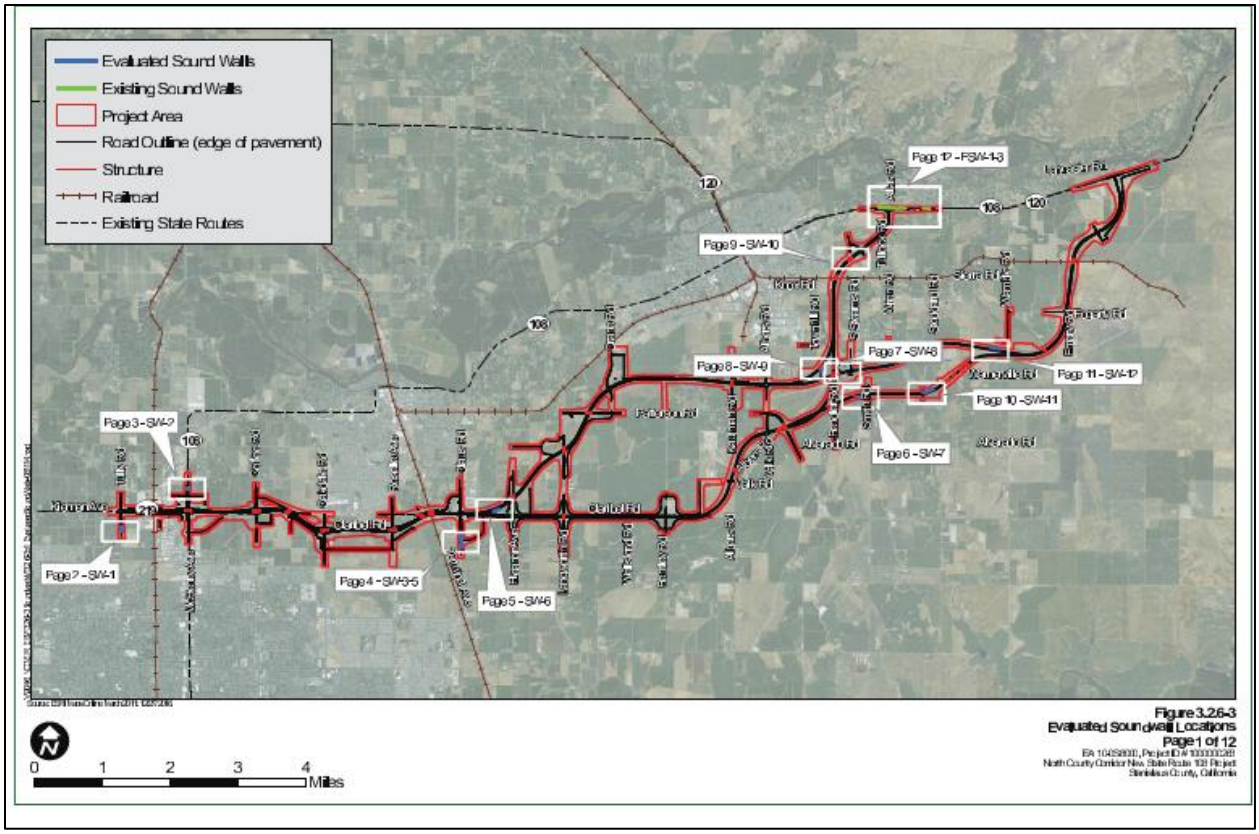
Good Morning Mr. Ctvrtlik,

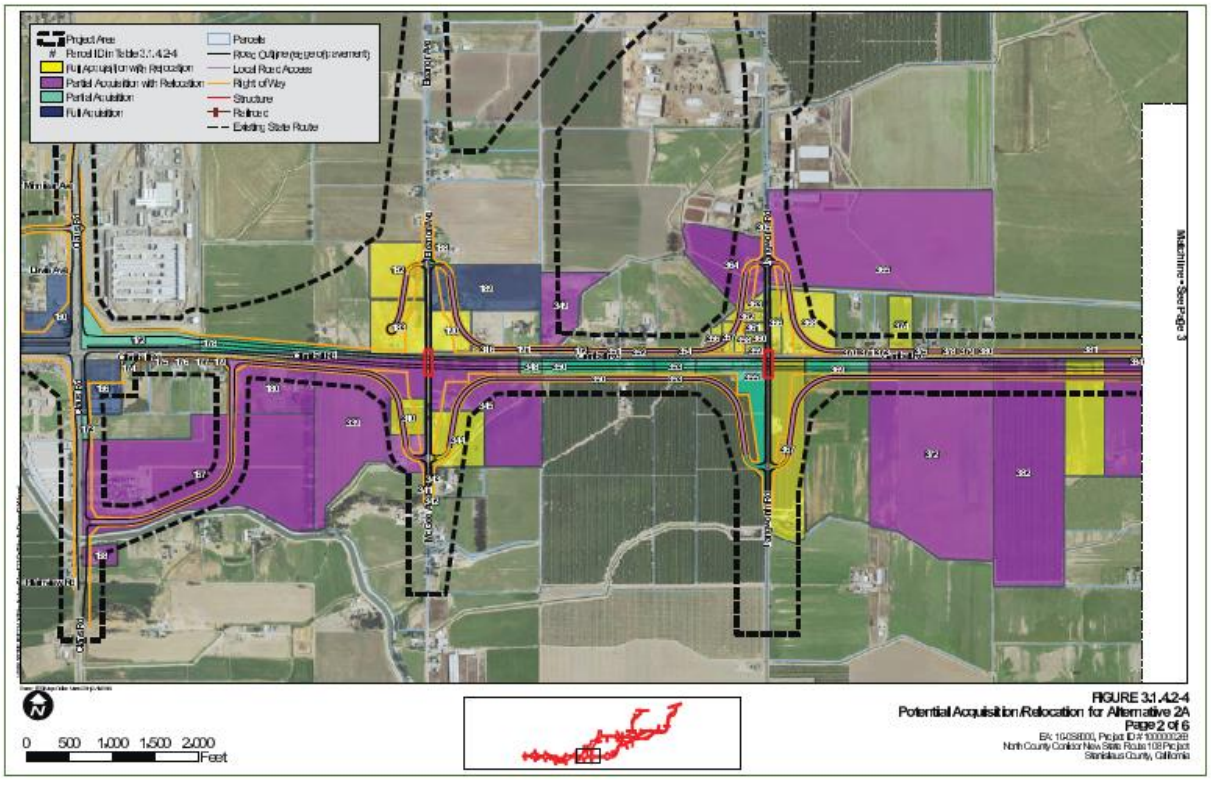
Thank you for your interest on the project. I have attached a map showing the general alignments under study for the North County Corridor project. It looks like regardless of alternative chosen your property at 4628 Claus Road will have some impacts. I also included two other pages from the Draft Environmental document that shows more details for your parcel. I have included a link to the Draft Environmental Document that you can access electronically as well. The attached maps can also be found in the Draft Environmental Document.

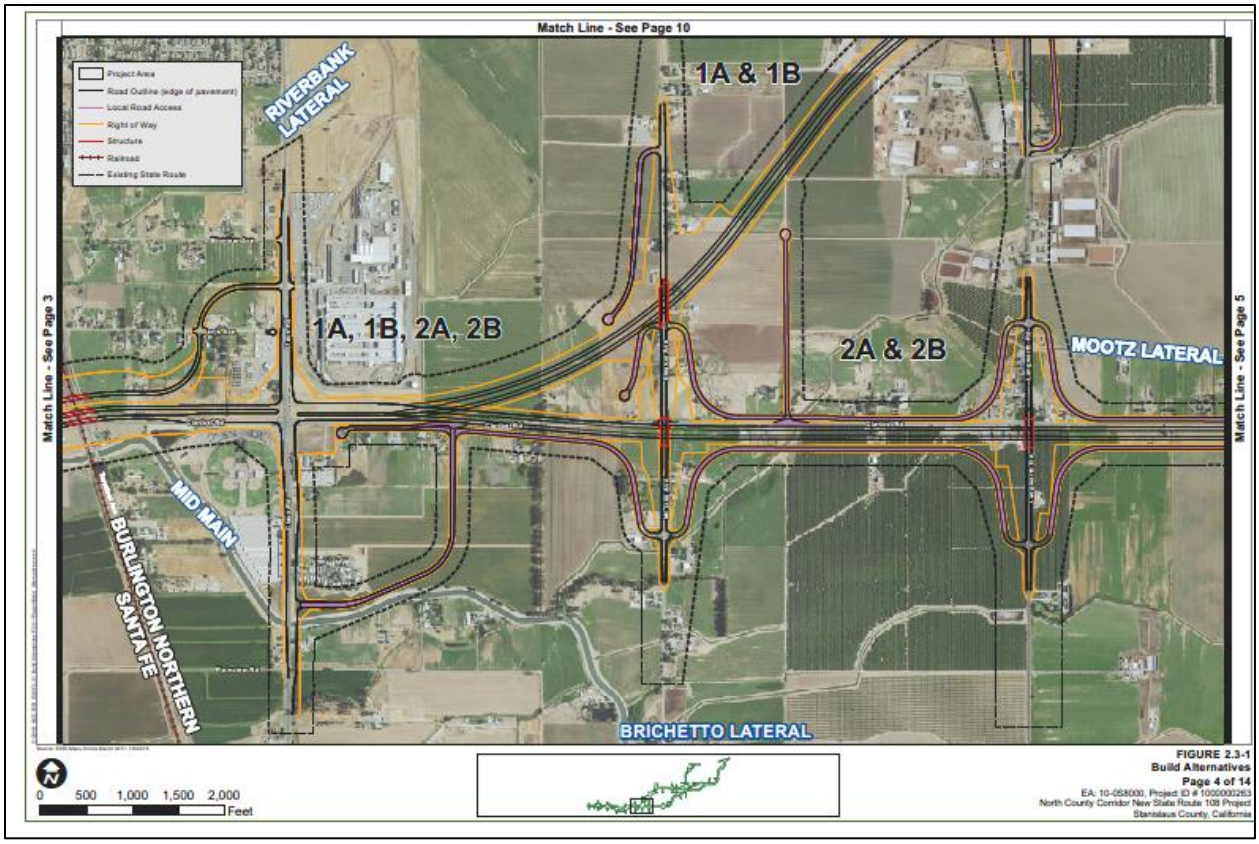
Preliminary design shows that there will be an impact to the most western mobile homes on the parcel, a partial acquisition will be likely. The map showing the 4 alignments also show that the parcel was evaluated for soundwalls. At this this time, the design is preliminary and subject to change pending the finalization of the technical studies and the environmental document. Please do not hesitate to call if you have further questions. Thank you.

http://www.dot.ca.gov/d10/project-docs/stanislaus/sr108northcountycorridor/NCC-Draft_EIREIS_8-2-17-voli.pdf

Grace B. Magsayo, P.E.
Project Manager
Program/Project Management
Office 209-948-7976
Mobile 209-483-1734


Evaluated Sound Walls
Existing Sound Walls
Project Area
Road Outline (edge of pavement)
Structure
Railroad
Existing State Routes
Page 12 - FSW-13
Page 9 - SW-10
Page 8 - SW-9
Page 7 - SW-8
Page 11 - SW-12
Page 10 - SW-11
Page 6 - SW-7
Page 3 - SW-2
Page 2 - SW-1
Page 4 - SW-3-5
Page 5 - SW-6
0 1 2 3 4 Miles
Figure 3.2.6-3
Evaluated Soundwall Locations
Page 1 of 12


Project Area
Parcel ID in Table 3.1.4.2-4
Full Acquisition w/o Relocation
Partial Acquisition with Relocation
Partial Acquisition
Full Acquisition
Parcels
Road Outline (edge of pavement)
Local Road Access
Right of Way
Structure
Railroad
Existing State Route
0 500 1,000 1,500 2,000 Feet
FIGURE 3.1.4.2-4
Potential Acquisition/Relocation for Alternative 2A
Page 2 of 6


Match Line - See Page 10
Project Area
Road Outline (edge of pavement)
Local Road Access
Right of Way
Structure
Railroad
Existing State Route
RIVERBANK LATERAL
1A & 1B
1A, 1B, 2A, 2B
2A & 2B
MOOTZ LATERAL
Match Line - See Page 3
Match Line - See Page 5
MID MAIN
BURLINGTON NORTHERN SANTA FE
BRICHETTO LATERAL
0 500 1,000 1,500 2,000
Feet
FIGURE 2.3-1
Build Alternatives
Page 4 of 14
EA: 10-058000, Project ID # 1000000263
North County Corridor New State Route 108 Project
Stanislaus County, California

Response 34 to Ctvrlik: Thank you for your comments; they have been included in the Final Environmental Document. It should be noted that the initial inquiry was received by telephone; however, this form of inquiry is no longer accepted as an official comment.

Preliminary design shows that there will be an impact to the most western mobile homes on the parcel, and a partial acquisition will likely be required. The parcel was also evaluated for soundwalls, and a soundwall (SW-3) is proposed along the east side of Claus Road. Please refer to the NCC *Noise Study Report* (2017) and the NCC *Noise Abatement Decision Report* (2017) for more information regarding soundwalls.

Comment 35
Comment from Jackson [No First Name]

-----Original Message-----
From: Magsayo, Grace B@DOT
Sent: Friday, August 18, 2017 10:07 AM
To: Jackson <Ghostlightmater@yahoo.com>
Cc: Torres, Juan@DOT <juan.torres@dot.ca.gov>; Matt Satow (msatow@drakehaglan.com) <msatow@drakehaglan.com>; judith@buethecommunications.com
Subject: RE: Project updates and construction updates regarding the SR 108-north county corridor project

Good morning,
Thank you for your interest on the North County Corridor Project. We will add you to the project's mailing list. Thank you.

Grace B. Magsayo, P.E.
Project Manager
Program/Project Management
Office 209-948-7976
Mobile 209-483-1734

-----Original Message-----
From: Jackson [mailto:Ghostlightmater@yahoo.com]
Sent: Thursday, August 17, 2017 9:33 PM
To: Magsayo, Grace B@DOT <grace.magsayo@dot.ca.gov>
Subject: Project updates and construction updates regarding the SR 108-north county corridor project

Hi I would like to sign up for project updates and construction updates regarding the SR 108- north county corridor project

Sent from ghostlightmater@yahoo.com

Response 35 to Jackson: Thank you for your comments; they have been included in the Final Environmental Document.

The contact information provided will be included on future distribution lists.

Comment 36
Comment from [No Last Name], Christie

From: Magsayo, Grace B@DOT
Sent: Friday, September 01, 2017 3:10 PM
To: christiebpmz@gmail.com
Cc: Torres, Juan@DOT <juan.torres@dot.ca.gov>; machadom@stancounty.com; Matt Satow (msatow@drakehaglan.com) <msatow@drakehaglan.com>; Kismetian, Anton@DOT <anton.kismetian@dot.ca.gov>
Subject: North County Corridor Project 5404 Epperson Ct. Oakdale

Good afternoon Christie,
I'm following up on our phone conversation yesterday regarding the project's impacts to your client's newly purchased property. I have checked with our technical team and the following information should be shared with them. I also encourage them to attend the schedule Public Hearing on Sept. 7, 2017 at the Gene Bianchi Community Center in Oakdale from 4 pm to 8 pm to learn more about the project. Please do not hesitate to contact me if you'd like to further discuss.

The property would have some potential temporary and permanent impacts as follows:

- Temporary Impacts: Construction period impacts include reconstruction of a roadway at the southern end of the said property to build access for properties located south of the said property and north of NCC roadway and access control State Right of Way.

- Indirect Permanent Impacts: Roadway for access to Langworth similar to existing dirt pathway and new overcrossing structure and vegetated (grasses – not lawn type but typical highway grasses) sideslopes for Langworth Road Overcrossing and roadway improvements (over NCC) for providing access across NCC to either proposed Crane Road intersection or existing Claribel Road.

- Direct Permanent Impacts: Potential acquisition and construction of the Kentucky Avenue or street to be named later roadway for providing access.
    - To be determine with ROW phase for details but assumed for DED as acquisition as follows:
        - See Figure 3.1.4.2-2 as ID# 203 as a partial acquisition for local road access.

Response 36 to Christie: Thank you for your comments; they have been included in the Final Environmental Document. This response is in regard to details that pertain to a phone conversation between Grace Magsayo and the commenter.

The property would have some potential temporary and permanent impacts as follows:

Temporary Impacts: Construction period impacts include reconstruction of a roadway at the southern end of the said property to build access for properties located south of the said property and north of the NCC roadway and access control to the state right-of-way.

Indirect Permanent Impacts: Roadway for access to Langworth similar to existing dirt pathway and new overcrossing structure and vegetated (grasses – not lawn type, but typical highway grasses) side slopes for Langworth Road overcrossing and roadway improvements (over NCC) for providing access across NCC to either the proposed Crane Road intersection or existing Claribel Road.

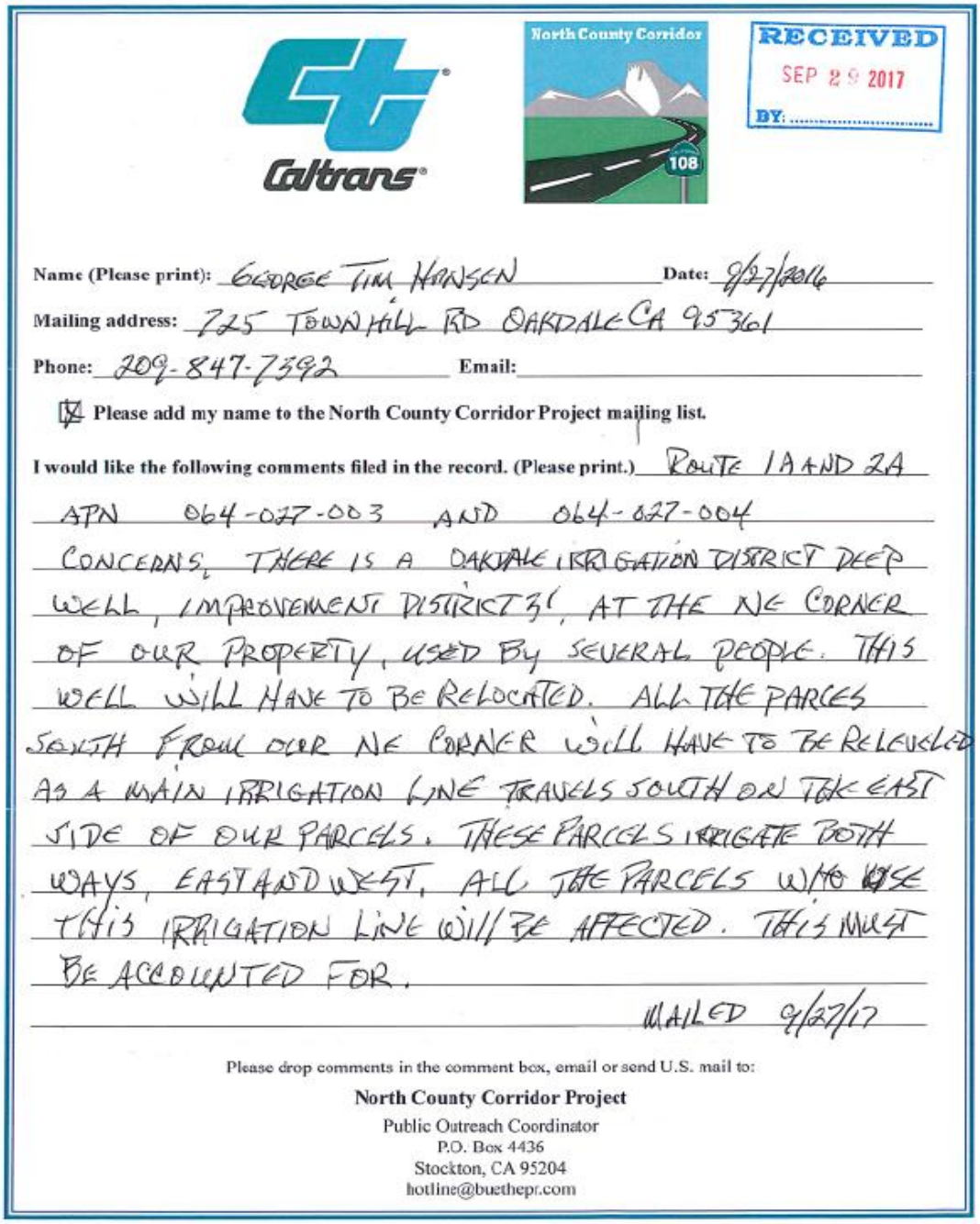
Direct Permanent Impacts: Potential acquisition and construction of the Kentucky Avenue or street to be named later as the roadway for providing access.

- To be determined in the right-of-way phase for details; assumed for the Draft Environmental Document as acquisition as follows:
    - See Figure 3.1.4.2-2 as ID# 203 as a partial acquisition for local road assistance.

Exact placement of the access road will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project. Stanislaus County and Caltrans are sensitive to the importance of the role housing and land plays in our lives and will take into account potential additional and specific impacts to the property to determine the necessary acquisition during the right-of-way negotiations. If it is determined that your property will be impacted by the proposed project and/or access road, then the Uniform Act will be followed. Caltrans, in coordination with Stanislaus County and Modesto City shall implement all property acquisition and relocation activities in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) of 1970 (Public Law 91-646, 84 Stat. 1894). The Uniform Act mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced by the project. The Uniform Act provides uniform and equitable treatment by federal or federally assisted programs of persons displaced from their homes, businesses, or farms, and establishes uniform and equitable land acquisition policies. See Appendix E in Volume 2 for more information on the Caltrans Relocation Assistance Program.

Also, Mitigation Measure RLC-1 (Section 3.1.4.2) includes measures that may be considered by Caltrans for incorporation into the relocation plan to minimize impacts to displaced businesses and residences. Accordingly, acquisitions would be conducted as necessary to build the approved project, and displaced residents would be provided just compensation in accordance with the Uniform Act.

Comment 37
Comment from Hansen, George Tim



Caltrans

North County Corridor

RECEIVED
SEP 29 2017
BY:

Name (Please print): GEORGE TIM HANSEN Date: 9/27/2016

Mailing address: 725 TOWN HALL RD OAKDALE CA 95361

Phone: 209-847-7392 Email:

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) ROUTE 1A AND 2A
APN 064-027-003 AND 064-027-004
CONCERNS, THERE IS A OAKDALE IRRIGATION DISTRICT DEEP
WELL, IMPROVEMENT DISTRICT 3', AT THE NE CORNER
OF OUR PROPERTY, USED BY SEVERAL PEOPLE. THIS
WELL WILL HAVE TO BE RELOCATED. ALL THE PARCES
SOUTH FROM OUR NE CORNER WILL HAVE TO BE RELEVELED
AS A MAIN IRRIGATION LINE TRAVELS SOUTH ON THE EAST
SIDE OF OUR PARCELS. THESE PARCELS IRRIGATE BOTH
WAYS, EAST AND WEST, ALL THE PARCELS W/HOSE
THIS IRRIGATION LINE WILL BE AFFECTED. THIS MUST
BE ACCOUNTED FOR.

MAILED 9/27/17

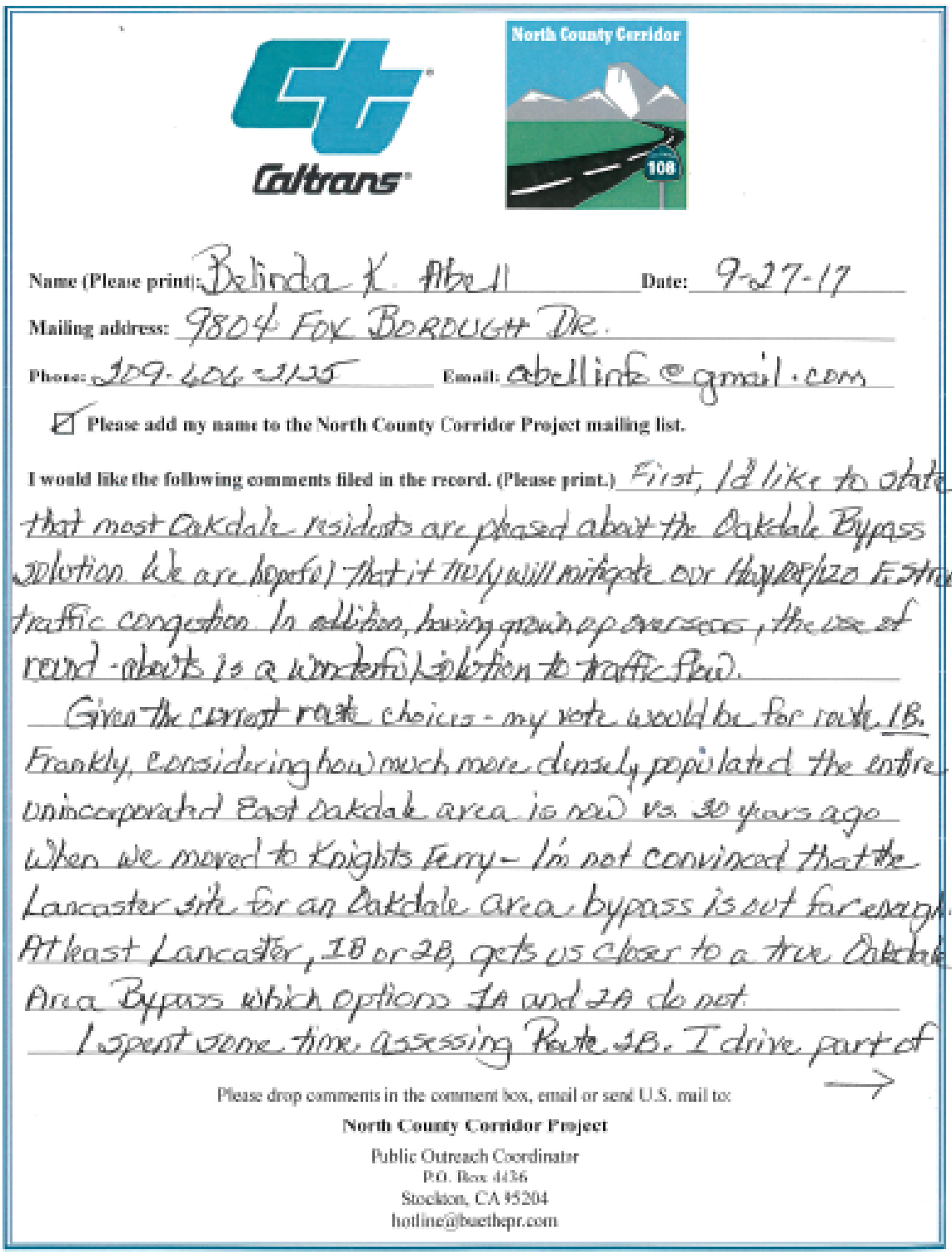
Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 37 to George Tim Hansen: Thank you for your comments; they have been included in the Final Environmental Document.

The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative, which will not impact your properties at the two APN parcels noted.

Comment 38
Comment from Abell, Belinda K.



Caltrans

North County Corridor

Name (Please print): Belinda K. Abell Date: 9-27-17

Mailing address: 9804 Fox Borough Dr.

Phone: 209-606-2125 Email: abellinfo@gmail.com

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) First, I'd like to state that most Oakdale residents are pleased about the Oakdale Bypass solution. We are hopeful that it not only will mitigate our Highway 120 East traffic congestion. In addition, having grown up overseas, the use of round-about's is a wonderful solution to traffic flow.

Given the current route choices - my vote would be for route 1B. Frankly, considering how much more densely populated the entire unincorporated East Oakdale area is now vs. 30 years ago when we moved to Knights Ferry - I'm not convinced that the Lancaster site for an Oakdale area bypass is out far enough. At least Lancaster, 1B or 2B, gets us closer to a true Oakdale Area Bypass which options 1A and 2A do not.

I spent some time assessing Route 2B. I drive part of →

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

that route now to bypass the center of Oakdale coming home from Modesto. However, 2B goes out too far, too far South and really only provides benefit as a bypass to Modesto. Option 1B provides Oakdale Area Locals benefit for access to Riverbank and Modesto.

As a 30 year Knights Ferry and Oakdale resident, my vote is option 1B.

Respectfully,

Sylvia K. Akell

Response 38 Belinda K. Abell: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 39
Comment from Absher, Ann

Caltrans

North County Corridor

Name (Please print): Ann Absher Date: 9/7/17

Mailing address: 14207 Warnerville Rd

Phone: 209 847 1464 Email:

☐ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) $700 million (probably more!) for a project that will reduce commute times by 5 min (according to recent article in the Modesto Bee) is a terrible waste of tax payer money. A simple stop light at Roselle + Claribel roads, and widening of existing road way in that area would benefit the area most. Also is this project goes forward, keeping it closer to Oakdale to benefit merchants makes more sense than sending it out to LB and 2b.

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 39 to Ann Absher: Thank you for your comments; they have been included in the Final Environmental Document.

Prior to in-depth analysis of the four proposed Alternatives 1A, 1B, 2A, and 2B, 18 other alternatives were considered in an Alternative Analysis Report; however, they were eliminated due to the excessive environmental impacts that would have been caused from their selection. Section 2.6 of the FEIR/EIS contains information regarding these 18 other alternatives, and the rational behind their elimination from further consideration. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

In addition, the traffic analysis within Section 3.16 of the NCC Final EIR/EIS discusses the additional backups on the main cross streets that will continue to worsen in the current configuration. The chosen alternative, Alternative 1B, will improve travel times on several of the main streets that cross highway 108/120. Also, the chosen Alternative will also improve the operation of the current 108/120 route through Oakdale and Riverbank.

Comment 40
Comment from Absher, Mike

Caltrans

North County Corridor

Name (Please print): Mike Absher Date: 9-7-17

Mailing address: 14207 WAGONWHEEL RD

Phone: 209 847-1464 Email: CDC1475@yahoo.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

THE PROJECT, IF BUILT NEED TO IMPACT THE LEAST AMOUNT OF LAND AND CONNECT TO EXISTING 108 AT THE CLOSEST POINT TO OAKDALE. (STARNS RD) THE MORE LAND EFFECT WILL CAUSE MORE SPRAWL

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 40 to Mike Absher: Thank you for your comments; they have been included in the Final Environmental Document. The project has been designed to minimize impacts to properties to the maximum extent feasible.

Comment 41
Comment from Adams, Jerry

October 16, 2017

Re: North County Corridor Project

Subject: Rode Industrial Park Ingress/Egress

Attn: Matt Machado – Stanislaus County Public Works Director

I spoke to you briefly regarding my concerns, as far as isolating the business park to a single entrance/exit point at the Cal Trans September 7th, meeting at the Bianci Center in Oakdale, CA.. The following is a copy of our comments pertaining to this matter.

Jerry Adams

CAL TRANS COMMENTS
NORTH COUNTY CORRIDOR PROJECT

October 13, 2017

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204

Re: Rode Industrial Business Park
Pentecost Ave., Charity Way, Bitritto Ave, Jeruselm Ct., Northwest Quadrant at Kiernan & McHenry Ave.

Attn: Public Outreach Coordinator

The business park area (including areas developed and undeveloped that will be served by the proposed road access Charity Way off of McHenry Ave is approx. 190 acres. It is currently divided into 2 areas (East & West) by the abandoned Tri Valley rail spur. The "West" area is bordered to the North by the MID canal; to the South by SR219, to the West by parcels fronting Tully Road, and to the East by Rode Industrial Business Park.

West Area - (Approximately 70 Acres), though largely undeveloped (46 acres), currently consists of

1) 24 Acre mini warehouse complex/Recreational vehicle storage lot
2) 5 Acre landscaping company parcel
3) 21 Acre almond farm
4) Approximately 20 acres bare ground

This area is currently entered and exited by Tunsen Road and various driveways (6) onto Kiernan Avenue (SR219). The area, even in its largely undeveloped state has considerable traffic flow of its own, due to the storage facility And landscape company. This area (particularly once built out) needs to be served independently.

East Area - (Approximately 71 Acres + 35 Acres additional), the "East Area" is commonly referred to as Rode Industrial Business Park. It is bordered to the North by an MID canal, to the East by McHenry Ave., and to the South by Kiernan Ave (SR219).

The park consists of approx. 71 acres of which approx. 50 acres is developed, 20 acres which are improved, but as yet undeveloped plus an additional approx. 35 acres to the N/E currently in agricultural use.

The Park is currently occupied by some 150 varied business ventures, (see attached list), to include large equipment rental, multiple large HVAC/Plumbing/Solar entities, construction, automotive and a (200) member Elks Lodge to reference but a few. There is over 600,000 sq. ft. of business enterprises at this time with another estimated 300,000 sq. ft. planned.

It is currently served by Charity Way onto McHenry Ave. to the East, and Pentecost Ave. to the South onto Kiernan Ave. (SR219). There is a tremendous amount of traffic, (Heavy truck, Light truck, and auto), creating congestion at these two exit/entrances now, without the balance of the designated park area having yet to be built.

The Cal Trans plan as designed directs the 70 acres to the West, back via a frontage road through the current Rode Industrial Business Park, while simultaneously eliminating the Pentecost Drive access/exit. This will reduce the area to one ingress/egress point while potentially doubling the traffic count.

The Charity Way access/exit is currently a massive safety issue as is. There doesn't appear to be any design details regarding Charity Way improvements or McHenry Ave. for this location. What is the 20 year design build-out level of service for Charity Way/McHenry Ave. intersection? When will it be signalized? A single access/exit for an approximately 190 Acre, business park is enormously insufficient regardless of design. The park was originally designed for multi access/exit locations. Multi access is also required by California State Fire Code, as well as the Fire Dept. per Stanislaus County Fire Marshall Dale Skiles. Charity Way will be accessing and crossing a multi-lane wide McHenry Ave.. There will be copious heavy truck multi-trailer, agricultural , and tremendous light truck and auto traffic. 41A

Local County, (and City) Fire Departments, as well as Planning need to be involved in this design. This one access/exit approach is a disaster waiting to happen, should there be the inevitable fire, toxic chemical release, evacuation, medical or other emergency services required into the business park. The one entrance/exit approach is but one accident away from shutting down the entire 190 acre, or for that matter any acre size business park. Health and Safety should not be sacrificed for design convenience.

Millions of dollars were invested in the design and building of Rode Industrial Park. It was done with public safety in mind, as well as, reasonable ingress/egress of the businesses located within the park. The continual viability of these business entities needs to be a consideration as well. 41B

We believe alternative ideas need to be developed such as connecting the frontage road at the West end cul-de-sac to Tully Road via the Tully facing properties (at some location) possibly further to the north away from the Kiernan/Tully intersection. The addition of accel/decell lanes into and out of the park, at Pentecost Ave. onto SR219 bringing traffic up to speed prior to merging, or decell lanes providing speed reduction opportunity prior to exiting onto Pentecost Ave. into the park would work idealy. A perfect example being the Hwy 99 Pelandale on ramp/ SR219 off ramp on Northbound Hwy. 99.

Jerry Adams
412 Bitritto Way Suite 11
Modesto, CA 95356
209-614-6692
Email – jerrydadams@gmail.com

cc: Matt Machado – Stanislaus County Public Works Director
Dick Monteith – County Supervisor – District 4
Dale Stiles – Stanislaus County Fire Marshall

PARTIAL LIST IMPACTED BUSINESS' AND OWNERS GROUP (EAST AREA)
RODE INDUSTRIAL PARK ONLY

DeHart-Plumbing/Heating-A/C-Solar
United Sign Co.
Cal Sign Wholesale
Velocity Solar
Zaninnis Cabinets
Safelite Auto Glass
Novo Technologies
Central West Ballet
Otts Auto Sales
Elks Lodge
Hi Heat Softball Academy
Strut Performing Arts
Al's Furniture Dist. Warehouse
Martin Moran Roofing
Blessed Auto Sales
The Simon Companies
McGrew and Companies
M.D. Detailing
Jaydens Journey
Hidden Valley Crossfit
All Pro Pest Services
Forbidden Motor Sports
Kredit Constrution
Party Rentals
Next Level Customs
Resolute Fitness
Valley Plumbing
Golden Slate Plumbing
Mid Valley Surgical
Pacific Rents & Equipment
Calif. High Reach Equip. Rentals
Lucas Business Systems.
Thomas Pool Cleaning & Repair
PX3 Sport Science
Lynn Lima CPA
Joann Guito CRTP
Royal Summit
Hutton Lovewell Inc. Painting
ATI West Inc.
RGI Pacific
E3 Diagnostics
Natural Remedies
R&S Erection

Norcal Valley Baseball Club
Auto Body Solutions
Gatewood Guitars
Paper Habit Studio
Right Now Couriers
Message In A Bottle
Industry Sound Studios
Honeys Air
Executive Electric
Michaels AG Vest
Kiwi's Classics
Tri Y Drafting
K&M Driveline Service
Modesto Auto Restyling
Auto And Fleet Mechanic
Conways Personal Training
K & M Motor Cars
Hex Printing & Design
Royal Summit Inc.
Jubilee Farms
Platinum Physical
Jay & Laura Ward
Charles & Linda Cheek
R.T. Productions
Sargon Younan
J & G Enterprises LLC
Sarkis Angilbert
Apothiki Properties LLC
West Valley Concrete
Sandwich Monkey
R.T. Financial Inc.
Tri County Inc.
Jim Lima
Bryce Russo
Willow Floral
Sunrise Condos
Bottoms Up Espresso
William Maurer
Willaim Maurer Jr.
209 Motors
Noral Auto
Joseph & Mary Micell
Gary & Charlotte DeHart

Thomas F. & Donna Jay Gehring
Linard & Nedhal Younan
Kelly Bus. Park – Julie Boersma
Danny & Josephine Collins
Bene Family Trust
Steve Espinosa Proservices
Mr. & Mrs. George Rawe
J.D. & Laura Ward
Helder & Laurie Garcia
Kevin & Pamela Gouttula
Brian P. French
Keith & Jill Parks
Harless Properties Inc.
Varni Properties
Rod DeHart
Kerry Walker
Dan Andrade
Phil Mastagni
Carl Gillihan
MRG Group/Roger Johnson
Mark Johnson-Greg Johnson
Brian Shelton
Richard Barzan
Matt Stall
MS Jayne Inc.
Nathan Grimmett
Greg Barzan
Charlie Menghetti
Jumping Things
Watson Bros. Upholstery
Danny Rays Precision Cycles
Tonis Escrow
Malakian Financial
AFLAC
Keystone Properties
Mitri's Rugs
Hot Striker Kick Boxing
JL Adams LLC Properties
Donaco Sales
Lucky Seven Taxi
Orion Construction
Tri Power Systems
Riverbank Motors

Ramos Auto
The Body Shop Fitness
Dennis Lanigan
H&H Heating & Air
Precision Stairs
Kar Tunez
Selecting Alternative Treatment Solutions
Audio Outlaws
Shelton Lee Flooring
Gymstars
Trewin Framery

Response to Jerry Adams: Thank you for your alternative ideas provided to improve access to the business park; they have been included in the Final Environmental Document and will be considered during final design.

Response 41A: The intersection at Charity Way/McHenry Avenue will be signalized as part of the proposed NCC project. The Level of Service (LOS) can be found in Table 6-2 of the *Final Traffic Operations Report for the North County Corridor* (March 2015), below, and is also discussed in Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle. The intersection is anticipated to operate at LOS A during the morning and LOS B during the afternoon, under all future-year build alternatives.

Response 41B: During property owner discussions, a variety of access methods were discussed. These access methods are preliminary and will be further analyzed by Stanislaus County and Caltrans during final design and right-of-way negotiations. There are two methods of restoring multiple points of access, which will likely be either through extending existing access from Tunson Road to Tully Road or by extending their access to the north toward Thieman Road over the MID Main Canal.

Comment 42
Comment from Albert, Mario

BDC

BROWMAN DEVELOPMENT COMPANY, INC.
Development • Leasing • Management

SENT VIA E-mail and Fed-Ex

September 20, 2017

Mr. Juan Torres
Mr. Philip Vallejo (philip.vallejo@dot.ca.gov)
Senior Environmental Planner
California Department of Transportation
Central Sierra Environmental Analysis Branch
855 M Street, Suite 200
Fresno, CA 93721

Subject: Stanislaus County North County Corridor (NCC) – State Route (SR) 108 Project and Route Adoption EIR Comments.

Dear Mr. Torres and Mr. Vallejo:

First Riverbank L.P. appreciates the opportunity to comment on the NCC EIR/EIS released for review officially on August 8, 2017. First Riverbank L.P. is the owner of the Crossroads Regional Shopping Center in Riverbank, CA (the "Shopping Center"). We developed the Shopping Center in 2004 and continue to own, manage and lease the quality, regional Shopping Center anchored by Target, Home Depot, Kohl's, Best Buy, Save Mart, Staples, Petco and many others. The total retail portion of the Shopping Center is nearly 600,000 square feet, which also included the development of an adjacent 152 single family homes.

As a long term landowner within Stanislaus County and the City of Riverbank, we are extremely concerned about the potential devastation the NCC may have on our existing retailers in the Shopping Center. Additionally, the potential for blight and urban decay is compounded with traffic being taken away from our main East/West arterial (State Route 218) and the creation of new competitive retail sites directly north of the proposed off-ramp. Furthermore, the significant loss of convenience and traffic delays that will occur along State Route 218 during the 3-4 years duration of the construction of the NCC will force shoppers at our Shopping Center's intersection to seek permanent, long term replacement retail centers for their shopping needs.

42A

1556 PARKSIDE DRIVE, WALNUT CREEK, CA 94596-3556 • (925) 588-2200 • FAX: (925) 588-2230

Further economic analysis needs to be performed regarding the potential loss of retail sales, subsequent loss of jobs within the City of Riverbank and the Shopping Center, and especially the potential for urban decay and blight specifically at the Shopping Center.

42A

The population projections for the City of Riverbank and Stanislaus County on Page 5 of the NCC EIR are grossly inaccurate. The NNC EIR states that by 2030, the City of Riverbank's population assumption is projected to be 69,508 and Stanislaus County is projected to be 821,715. The City of Riverbank's current population is 24,389 and Stanislaus County, based on US Census data, is approximately 541,000. The population assumption for the City of Riverbank in the NCC EIR is nearly triple the 2017 actual population and the adopted City of Riverbank MSR and Housing element analysis projects only a population of 34,961 by 2030. The City of Riverbank's MSR population data should be used and the resultant traffic and population should be modified.

42B

1. The NCC EIR is legally inadequate and failed to adequately study and address the environmental effects on the change in traffic patterns that would result from the closing of the businesses within the Shopping Center and opening at a different location along the NCC.
    - Changing the traffic patterns away from the Shopping Center will cause it and the businesses within it to relocate and/or fail. It has been our experience in similar circumstances that major tenants will vacate the Shopping Center and smaller regional tenants will vacate the Shopping Center and/or go bankrupt.
    - The foregoing environmental impact will not only occur at the Shopping Center, but also all other retail locations including downtown Riverbank and other areas in proximity to the NCC because customers and travelers will bypass the City of Riverbank without otherwise stopping. A significant amount of business at the Shopping Center occurs by passerby traffic. High vehicle passerby and regional traffic is strongly correlated to a successful retail shopping center.
    - These environmental impacts and the resulting economic blight that will occur need to be addressed in the NCC EIR and an economic blight analysis and study of the change in traffic patterns need to be completed.

2. The NCC EIR failed to study the economic impact on the City of Riverbank and surrounding communities that would result if retailers in the Shopping Center and other businesses throughout the City of Riverbank closed as a result of the NCC and the opening of new shopping centers outside of the community.
    - The City of Riverbank's budget depends on revenue from sales tax and property tax generated by the Shopping Center.
    - If the Shopping Center loses all or a significant number of tenants, it will have a major impact on the City of Riverbank's ability to fund necessary community services, resulting in an environmental impact on the community.
    - If the impact is significant on the City of Riverbank, the potential for loss of jobs and the potential of a City bankruptcy will become a real threat.

42C

3. In general, the need for the NCC is not supported by the current population or expected growth in the City of Riverbank.
- The NCC EIR grossly overstates the City of Riverbank and County of Stanislaus populations, which artificially lowers the cost and increases the benefit.
- Impact and devastation to the Shopping Center and Riverbank downtown can't be mitigated.
- Existing roads including the recent widening of Claribel Road can handle the traffic in question and keep cities, downtown and retail projects successful without the NCC.
- There are numerous examples throughout California where shopping center projects and traffic as projected in 2042 work well together and both survive and function well.
- The NCC will be growth inducing for housing sprawl without accompanying jobs.
- Waste of public resources in time when those resources could be better used elsewhere on existing infrastructure on expanding existing infrastructure to deal with growth at significantly less costs – probably 10% of costs or $50 million vs $730 million project.
- All reasonable alternatives need to be looked at including improvement to existing improvements rather than a cost prohibitive $700-800 million project that will likely be in excess of $1 billion at construction start.

42C

As a potential interim solution, we recommend State Route 218 from Tully to Oakdale to be widened from four (4) travel lanes to six (6) travel lanes and Oakdale Road to Claus Road be widened from two (2) travel lanes to four (4) travel lanes. This widening would be considerably more cost efficient than a projected $700 million project.

42D

Respectfully,

Mario Albert
General Counsel

CC: Darryl Browman

Response to Mario Albert: Thank you for your comments; they have been included in the Final Environmental Document.

Response 42A: Caltrans understands your concerns regarding this project and the potential for it to change the existing economic character of downtown Riverbank. Exact changes to the economic character cannot be assessed; however, many project features have been designed to improve characteristics in the region, such as improving traffic circulation. **Response 42B:** Population forecasts published by the California Department of Finance through 2060 suggest that population growth and its associated development will continue in the study area and surrounding region. Table 3.1.2.-1 summarizes the population projection for Stanislaus County. The Stanislaus County population is expected to increase by 76.3 percent over the 45-year period from 2015 to 2060. In comparison, the general population for California is forecasted to grow 35.8 percent.

Cities in the county have proposed or are considering significant expansion of their spheres of influence to accommodate anticipated growth. Most development would not be approved by the County unless first approved by the city within whose sphere of influence it lies. This policy aims to discourage developments that are inconsistent with the land use designation from a specific city's general plan or exceed the existing service level of a sanitary sewer district, domestic water district, or community service district that provides service to the unincorporated area.

Table 1.2.2-1 – Projected Population in Northern Stanislaus County (with data sources) has been altered to reflect the 2008 Modesto Urban Area General Plan Master EIR, Executive Summary and the 2016 Riverbank Municipal Service Review and Sphere of Influence Update. The table is referenced below to indicate the project populations used for the proposed project (found on page 6 of the NCC Final EIR/EIS Volume I of II):

The 2035 population estimates for the City of Riverbank will be updated to reflect the 2016 StanCOG Forecast Summary of 29,300.

Response 42C: Construction of the project would require conversion of residential, commercial, industrial, and agricultural lands to public right-of-way to accommodate the proposed expansion of roadway. The project would pose impacts to a wide range of business uses, including retail, restaurant, automotive, office, and consumer services. All Build Alternatives would directly affect 5 manufacturing, 8 retail, and 13 service businesses. These businesses are shown in Table 3.1.4.1-10. Most of these businesses are in Segment 1 of the project.

Displaced businesses would be relocated within the county. Businesses requiring relocation will be provided relocation assistance payments and advisory assistance in accordance with the Caltrans Relocation Assistance Program (RAP), based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Title 49 Code of Federal Regulations Part 24. See details below in Section 3.1.4.2, Relocation.

The project is designed to accommodate future population and economic growth in northern Stanislaus County. Implementation of the North County Corridor would benefit businesses in the study area by reducing travel times, increasing the average operating speeds, and improving

travel time reliability. The project would also improve goods movement efficiency at a regional level, which would strengthen the agricultural and general economy of Stanislaus County.

The *Final Traffic Operations Report for the North County Corridor* (2015) study for the project, and information provided in Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle concluded that traffic redistribution as a result of any of the alternatives (1A, 2A, 1B, and 2B) would improve the level of service throughout the region, and without this project, future level of service and delays would increase throughout the region to unacceptable levels.

Further, fixing existing roads does not meet the purpose and need of the project; however, the current design of the project meets the purpose of the project, which is to reduce average daily traffic volumes and current traffic congestion and accommodate anticipated future traffic on the existing SR-108 and the surrounding regional transportation network in Stanislaus County and the cities of Modesto, Riverbank, and Oakdale. Further information regarding the purpose and need of the project can be found in Section 1.2 of the NCC Final EIR/EIS.

Lastly, Section 3.1.1.1 of the NCC Final EIR/EIS discusses the process of frontage road development and benefits of these roads for the businesses.

Response 42D: The *Final Traffic Operations Report for the North County Corridor* (March 2015) encompassed the entirety of the proposed project area and did not identify an increase in traffic on the Claus Road corridor south or north of Ceres as a result of the proposed project. Please refer to the traffic operations report for more information and Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle.

Prior to analysis of the four proposed Alternatives 1A, 1B, 2A, and 2B, and the selection of 1B as the preferred alternative, 18 other alternatives were also considered in an Alternative Analysis Report; however, they were eliminated due to the excessive environmental impacts that would have been caused from their selection.

As part of the Alternative Analysis Report, the alternatives were screened through a preliminary screening process that focused on determining if a specific alternative would meet the 2030 traffic needs and if any major engineering considerations would affect the safety or function of the facility. From this preliminary screening, 18 alternatives were considered during the alternative screening process.

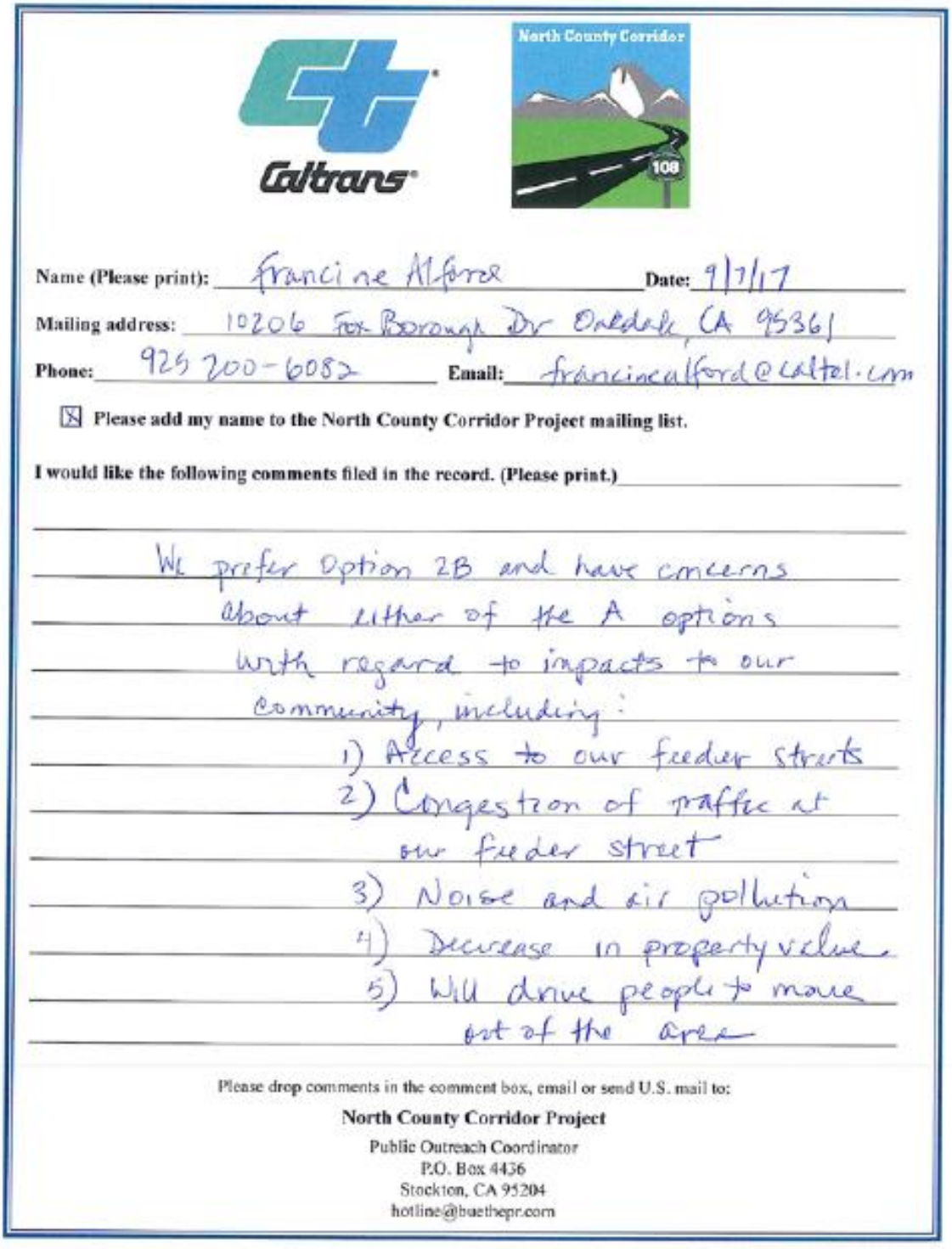
Seven broad-based criteria of the Project Development Procedures Manual were used to screen the initial Build Alternatives:

- Purpose and need: Would the alternative meet the project's purpose and need?
- Excessive project cost: Would the alternative result in a substantially higher overall cost?
- Relocations and acreage: Would the alternative require excessive removal of businesses, residences, or urban or rural acreage?

- Operational or safety problems: Would the alternative result in operational or safety problems?
- Adverse social, economic, or environmental impacts of extraordinary magnitude: Would the alternative disrupt or divide an established community or result in economic or social impacts?
- Cumulative impacts: Would cumulative impacts result due to relocations, operational or safety problems, or social, economic, and environmental impacts?
- Rejected at an earlier stage: Was the alternative rejected at an earlier stage of project development?

A widening of State Route 219 (Claribel Road) from Tully Road to Claus Road would not have met the project purpose and need and was not considered as a feasible project alternative. Ultimately, the four chosen alternatives were found to best meet the purpose and need of the NCC project, and all four serve to simplify traffic exposure from west to east. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Please refer to Section 2.5 of the NCC Final EIR/EIS for more information regarding all alternatives explored.

Comment 43
Comment from Alford, Francine



Caltrans

North County Corridor

Name (Please print): Francine Alford Date: 9/7/17

Mailing address: 10206 Fox Borough Dr Oakdale, CA 95361

Phone: 925 200-6082 Email: francinealford@caltol.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

We prefer Option 2B and have concerns about either of the A options with regard to impacts to our community, including:

1) Access to our feeder streets
2) Congestion of traffic at our feeder street
3) Noise and air pollution
4) Decrease in property value
5) Will drive people to move out of the area

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 43 to Francine Alford: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

The *Final Traffic Operations Report for the North County Corridor* (March 2015) encompassed the entirety of the proposed project area and did not identify an increase in traffic on the Claus Road corridor south or north of Ceres as a result of the proposed project. Please refer to the traffic operations report for more information and Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle.

According to the Caltrans Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects (May 2011), a noise impact occurs when the predicted future noise level with the project substantially exceeds the existing noise level (defined as a 12 dBA or more increase) or when the future noise level with the project approaches or exceeds the noise abatement criteria (NAC). Approaching the noise abatement criteria is defined as coming within 1 dBA of the noise abatement criteria.

A Noise Study Report (July 2016) and Noise Abatement Decision Report (July 2016) were prepared for this project. The Noise Study Report analyzed existing and future noise at sensitive receptors in the project vicinity. Your home is located approximately 3 miles from the connection of the North County Corridor and State Route 120, and no noise impacts associated with the project are anticipated at your home.

The Air Quality Report (January 2017) and Section 3.2.5 of the NCC Final EIR/EIS – Air Quality – for the proposed project discusses and addresses the existing and potential air quality impacts. The study was conducted in accordance with the air quality analysis guidance provided in the Caltrans *Standard Environmental Reference* and the San Joaquin Valley Air Pollution Control District *Guide for Assessing and Mitigation Air Quality Impacts* (2002).

We understand your concerns regarding this project and the potential for it to change the existing character of your neighborhood. Property values are assessed based on a large number of variables, many of which may change as a result of this project; however, not all the changes will necessarily be detrimental to existing property values. Exact changes to individual property values cannot be assessed; however, many project features have been designed to improve characteristics in the region.

Comment 44
Comment from Allen, Ron

>>> "Ron" <ron.a@ccsonet.org> 9/8/2017 2:06 PM >>>
I would like my following comments filed as point of record concerning the North County Corridor Project.

September 8, 2017

[redacted]

Kristin Olsen, Matt Machado, and/or NCCP Public Outreach Coordinator,

I have evaluated each of the proposed routes and **I am opposed to route 1A or 2A where it ends at 108/120 and Atlas Road**. I am not opposed to 2A or 2B.

As a home owner of the Atlas Road Area and having traveled for years up and down 108/120 from Sonora to Oakdale, I know the traffic patterns and noise associated with this traffic very well. Having the roundabout at

44A

Atlas road will definitely cause traffic congestion at Atlas and 108 for the thousands of area residents. It will also have grave concerns during inclement weather.

44B

This roundabout is also a deterrent for new home buyers, which will drive the resale value down. Also, when I purchased my home, the roundabout and/or North county Corridor Project was never disclosed in my purchase agreement which could raise concerns with the selling realtor. All of which is not fair or good business for California.

Another concern is the traffic speeds will be adversely effected at Stearns Road and 108, where there have been many fatality or serious vehicle accidents; however placing the roundabout at/or about Lancaster Road and 108 would almost eliminate traffic all accidents at that location and continue to slow traffic into Oakdale.

As a point of reference: weekend or holiday travel from Sonora towards Oakdale is always heavy traffic, making it impossible to make the left hand turn from eastbound 108/120 to Atlas Road throughout the day. However, it is always possible to make the left hand turn at Dillwood where the traffic is spread out. This is where many local residence turn to cross 108/120 to get home safely on the weekends and/or holidays (Many residents stay home on these heavy traffic days).

44C

Based on the aforementioned, I urge you <u>not</u> to use routes 1A or 2A.

Feel free to contact me for additional questions and concerns.

Ron Allen
State Board Secretary /
Administrative Labor Liaison /
Government Relations Officer
California Correctional Supervisors Organization

Response to Ron Allen: Thank you for your comments; they have been included in the Final Environmental Document.

Response 44A: The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 44B: Please refer to Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/ Pedestrian and Bicycle – for the traffic analysis and report of the project area. This report encompasses an analysis and discussion of existing traffic operations and impacts, as well as those related to each of the proposed alternatives within the project description. It is anticipated any proposed roundabouts will operate at a Level of Service A or B under the future 2042 afternoon peak hour.

Response 44C: Alternative 1B begins near Warnerville Road and continues northeast for 3.3 miles, and then crosses the Sierra Railroad with a grade-separated structure before turning northward toward Fogarty Road and its State Route 108/State Route 120 end, 1.5 miles east of the State Route 108/State Route 120 and Wamble Road intersection.

The South Stearns Road intersection (east of Bendler Road and northeast of Oakdale Irrigation District South Main Canal) with the proposed NCC alignment will consist of an at-grade intersection with two 12-foot-wide through lanes in each direction along the NCC alignment.

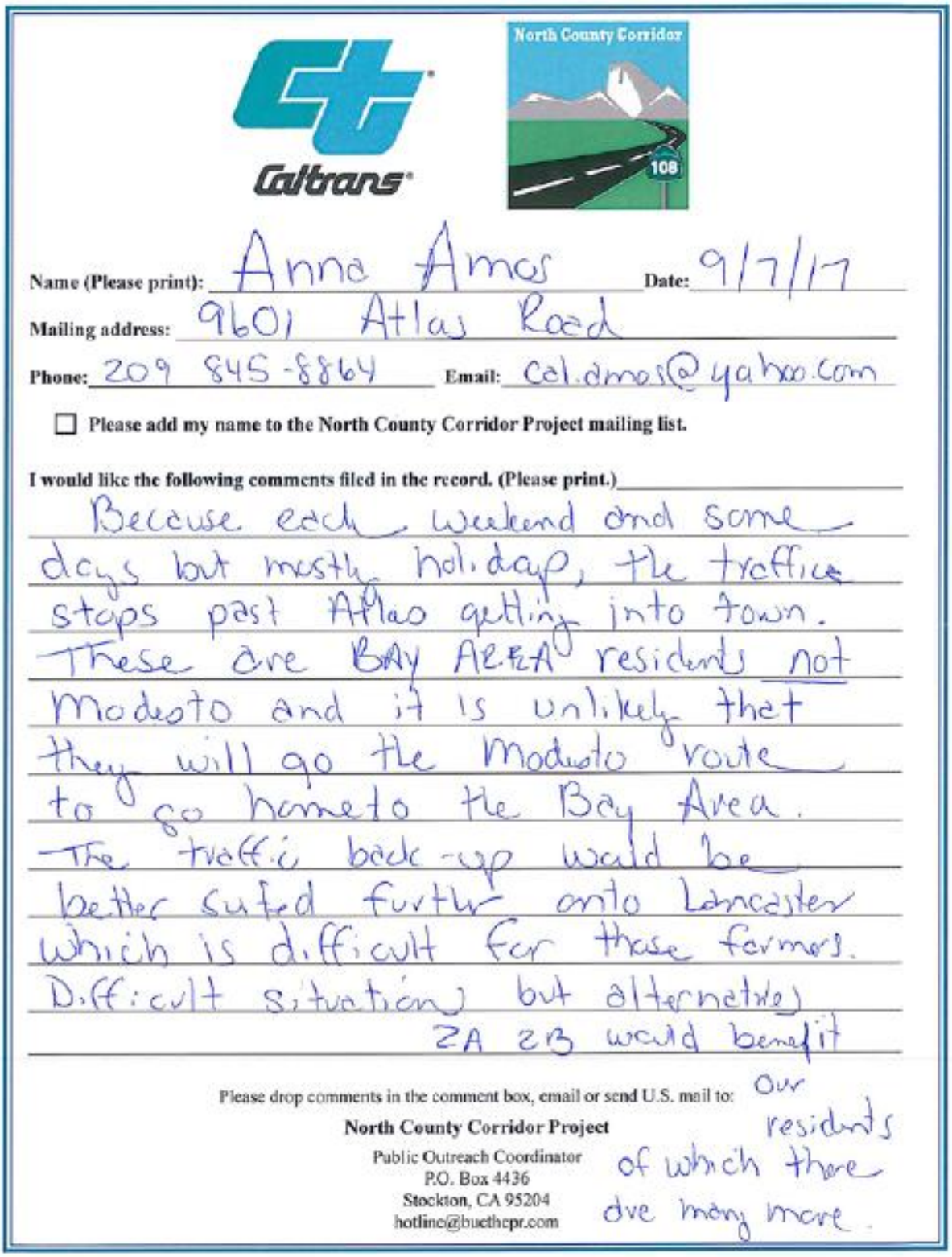
Fogarty Road will be elevated over the NCC alignment with an overcrossing structure along its current alignment. A new local road intersection will cross the proposed NCC alignment at approximately 5,000 feet south of the State Route 108/State Route 120 eastern end with an at-grade four-way roundabout. The roundabout will consist of one combination through/exit lane and one exit lane.

The intersection of State Route 108/State Route 120 with the proposed NCC alignment will consist of an at-grade three-way roundabout with one 12-foot-wide combination through/exit lane and one exit lane for all directions except along westbound State Route 108/State Route 120.

The following supplemental information was added to the Traffic and Transportation/Pedestrian and Bicycle (Section 3.1.6) of the Final Environmental Document:

An Intersection Control Evaluation (ICE) summary, per Caltrans Policy Directive 13-02 (Traffic Operations Policy Directive), was performed at each of the proposed at-grade state highway intersections to identify the most effective intersection traffic control strategy (i.e., roundabout or traffic signal). Signalized and Unsignalized Intersection Design and Research AID (SIDRA) software package operations tools were also used for assessing effectiveness of roundabouts at the proposed intersections.

Comment 45
Comment from Amos, Anna



Caltrans

North County Corridor

Name (Please print): Anna Amos Date: 9/7/17

Mailing address: 9601 Atlas Road

Phone: 209 845-8864 Email: cal.amos@yahoo.com

☐ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

Because each weekend and some days but mostly holidays, the traffic stops past Atlas getting into town. These are BAY AREA residents not Modesto and it is unlikely that they will go the Modesto route to go home to the Bay Area. The traffic back-up would be better suited further onto Lancaster which is difficult for those farmers. Difficult situation but alternatives ZA ZB would benefit our residents of which there are many more.

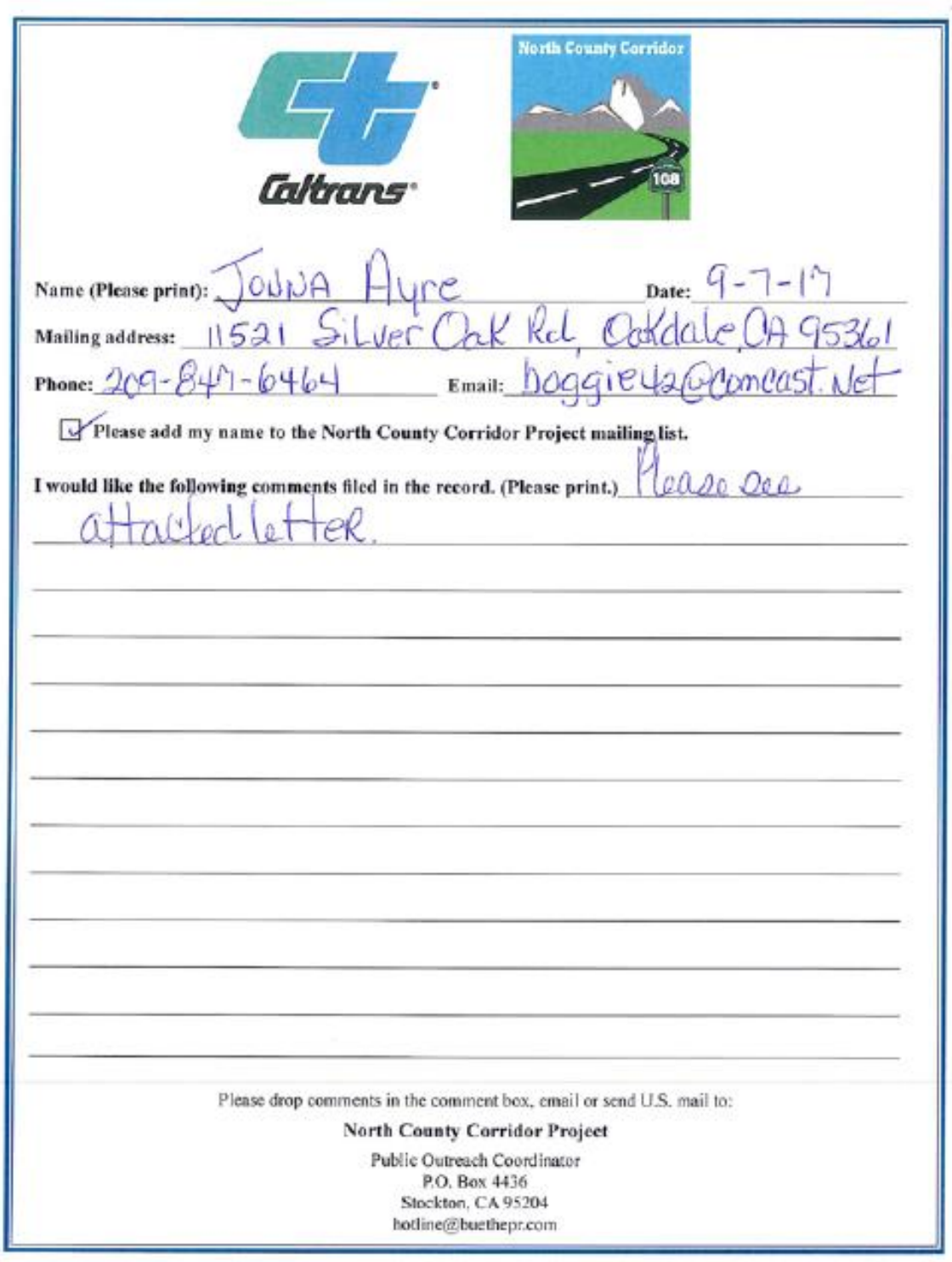
Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 45 to Anna Amos: Thank you for your comments; they have been included in the Final Environmental Document.

The *Final Traffic Operations Report for the North County Corridor* (2015) study for the project, and information provided in Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle concluded that traffic redistribution as a result of any of the alternatives (1A, 2A, 1B, and 2B) would improve the level of service throughout the region, including downtown Oakdale. These regional traffic improvements will benefit those traveling throughout Stanislaus County, as well as those traveling to and from northern and southern California.

Comment 46
Comment from Ayre, Jonna



Caltrans

North County Corridor

Name (Please print): JONNA Ayre Date: 9-7-17

Mailing address: 11521 Silver Oak Rd, Oakdale, CA 95361

Phone: 209-847-6464 Email: boggie42@comcast.net

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) Please see attached letter.

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

North County Corridor By Pass

Sept 7th, 2017

To Whom it May Concern,

The need for a by pass is obvious when you drive through Oakdale on a week end or holiday as the traffic is backed up and stopped in many cases trying to get from the Sonora, Yosemite or other areas east of Oakdale on Highway 120/108. I live east of town and make sure that I am not having to travel from my area off of Dillwood Rd to town on those days.

They have talked about a bypass for the 33 years that I have lived here and hopefully it is getting closer to a reality, however I feel that two of the routes that are being considered are very wrong, and that is route 1A and 2A, they do not actually BYPASS Oakdale, they come in at a place that will impact hundreds of homes that travel the highway daily and why should they have to deal with bypass people that are going vacationing? Route 2B seems to go around the town, neighborhoods and end in an area that is far enough out of town to be called a BYPASS and it can take care of an area that has a lot of accidents at a very dangerous curve.

Route 1B ends up in the right place, but how you get there is flawed, it goes through neighborhoods and then turns and goes toward Lancaster Rd.
It seems that government and Cal Trans don't look far enough in the future. Some of the areas locally that have had streets widened and street lights put in, a few years later they come back, tear up the street again, widen it and put in new lights costing hundreds of thousand of dollars, when with a little forethought it could have been done right the first time.
So my point being, please look to the future as Oakdale is growing and it is growing to the east where you are looking to come out on two of your routes and again, that will not be a BYPASS.

Thank you,
Jonna Ayre

Response 46 to Jonna Ayre: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS. This alternative takes the alignment further east bypassing Oakdale and improving the level of service in the region. The project also analyzed local/frontage roads to account for the future needs of the traffic conditions.

Comment 47
Comment from Baker, Charlonia M.

Caltrans

North County Corridor

RECEIVED
SEP 13 2017
BY:

Name (Please print): CHARLONIA M. BAKER Date: 9-10-17

Mailing address: 3941 DAVIS Ave Modesto CA 95357

Phone: 209/869-4771 Email: BAKERSMAC@yahoo.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) I have several concerns. First being the condition of Davis Ave. It is basically a one lane Road - with extreme drainage issues. If you make a cul-de-sac the drainage will be worsen. I will email pictures The street floods from RAIN or OVERRUN PASTURE WATER in front of three houses. The irrigation system thru OID runs at the back of the property - just where your access street appears to be. ARE you planning on moving the valves & Lines. What about the PASTURE fencing?

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Will you be moving the fences, So that the Animals will STILL Be contained?

What kind of sound protection will we have?

How will this effect property value?

Response 47 to Charlonia M. Baker: Thank you for your comments; they have been included in the Final Environmental Document.

The project has been designed to provide drainage improvements to accommodate the excess stormwater as a result of the increased impervious surfaces. The cul-de-sac at Davis Avenue is necessary to provide an alternative intersection approximately 500 feet north of the existing Davis Avenue terminus; however, it is not anticipated to worsen drainage.

The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative, and final acquisitions and relocations will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project based on this selection. Right-of-way acquisition and relocation will take into account potential additional and specific impacts to the property, including irrigation systems, and they will be addressed and modified/replaced and/or fairly compensated for during the final phase of the right-of-way negotiations. Similarly, any impacted valves, irrigation lines, or pasture fences will be relocated as necessary, and any animals contained within the pasture will remain within the relocated fence.

Based on the results of the noise study, the existing noise level at the property immediately adjacent to your property, 3973 Davis Avenue (Receiver ID 16.3 in Table 3.2.6-3) is 58 dBA. The modeled noise level at design year is 62 dBA. Also, the existing noise level at the property south of your property, 3874 Davis Avenue (Receiver ID 16.1 in Table 3.2.6-3) is 47 dBA; the modeled noise level at design year is 58 dBA. The Noise Abatement Decision Criteria for residential properties is set at 67 dBA. Further, a noise impact is considered significant if a change of 12 dBA or greater occurs between existing and design year dBA. As the modeled noise level at these adjacent properties did not approach or exceed the Noise Abatement Decision Criteria, and as the change in noise level from existing to design year does not exceed 12 dBA, sound impacts are not considered significant, so no sound protection is necessary for your property or other properties on Davis Avenue.

Further, we also understand your concerns regarding this project and the potential for it to change the value of your property. Property values are assessed based on a large number of variables, many of which may change as a result of this project; however, not all the changes will necessarily be detrimental to existing property values. Exact changes to individual property values cannot be assessed; however, many project features have been designed to improve characteristics in the region.

Comment 48
Comment from Barbano, Anthony

Caltrans

North County Corridor

Name (Please print): ANTHONY BARBANO Date: 9/7/17

Mailing address: 6207 STODDARD RD, OAKDALE, CA 95361

Phone: 209 947 1503 Email: BUCKY588@YAHOO.COM

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

NO ON OPTION 2B. HAVE LIVED IN MY HOME ON THIS PROPERTY FOR OVER 25 YEARS. MOVED TO THIS BEAUTIFUL TOWN TO ESCAPE THE HUSTLE OF A BIGGER CITY; TO RAISE MY CHILD IN A SERENE, FAMILY FRIENDLY TOWN. I PICKED THIS PROPERTY FOR ITS BEAUTY, NEIGHBORHOOD & OPEN SPACES. I'D HATE TO MOVE. I DONT WANT A HIGHWAY JUST TWO DOORS DOWN. NO ON 2B!!

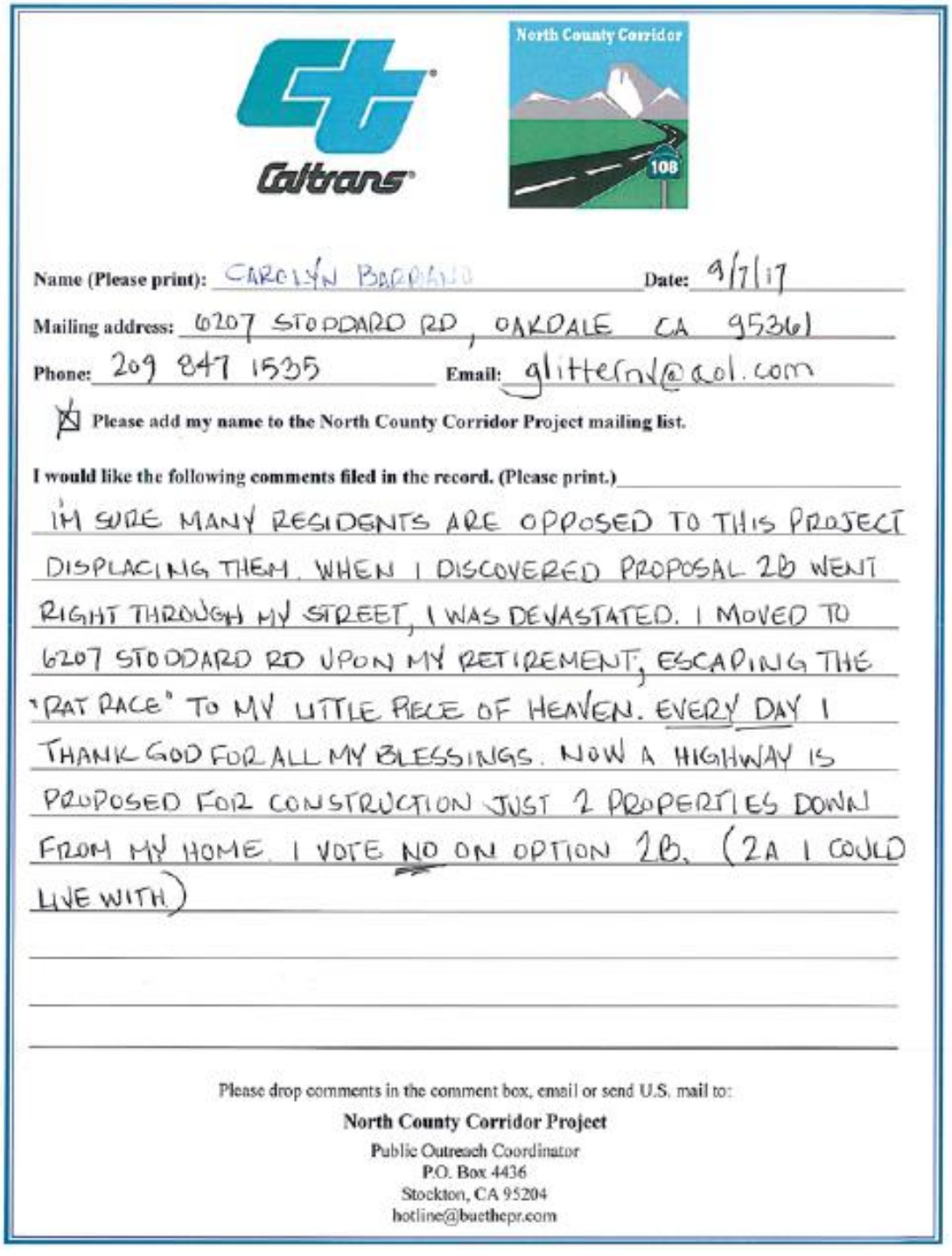
Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 48 to Anthony Barbano: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 49
Comment from Barbano, Carolyn



Caltrans

North County Corridor

Name (Please print): CAROLYN BARBANO Date: 9/7/17

Mailing address: 6207 STODDARD RD, OAKDALE CA 95361

Phone: 209 847 1535 Email: glitternv@aol.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

IM SURE MANY RESIDENTS ARE OPPOSED TO THIS PROJECT DISPLACING THEM. WHEN I DISCOVERED PROPOSAL 2B WENT RIGHT THROUGH MY STREET, I WAS DEVASTATED. I MOVED TO 6207 STODDARD RD UPON MY RETIREMENT, ESCAPING THE "RAT RACE" TO MY LITTLE PIECE OF HEAVEN. EVERY DAY I THANK GOD FOR ALL MY BLESSINGS. NOW A HIGHWAY IS PROPOSED FOR CONSTRUCTION JUST 2 PROPERTIES DOWN FROM MY HOME. I VOTE NO ON OPTION 2B. (2A I COULD LIVE WITH)

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 49 to Carolyn Barbano: Thank you for your comments; they have been included within the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 50
Comment from Barnes, Brandy J. and Sousa, Eric J.

RODARAKIS & SOUSA
A PROFESSIONAL LAW CORPORATION

October 31, 2017

VIA EMAIL (WITHROWT@STANCOUNTY.COM)

Terry Withrow, Chairman
North County Corridor Transportation
Expressway Authority
1010 10th Street, Suite 6500
Modesto, CA 95354

Re: North County Corridor – New State 108 Project and Route Adoption (the "Project")

Dear Mr. Withrow:

This office represents John P. Brichetto, a local farmer and landowner affected by the proposed Project. We understand that pursuant to the agenda for tomorrow's meeting, the Board of Directors for the North County Corridor Transportation Expressway Authority ("NCC TEA") is scheduled to make a motion to select and recommend a preferred alignment alternative for the Project. The purpose of this letter is to advise you of Mr. Brichetto's opposition to the Project, and in particular, to the alternative identified as Alternative 1B. 50A

On October 16, 2017, this office, on behalf of Mr. Brichetto, sent a letter to the California Department of Transportation (the "Department") in opposition to the Project and Alternative 1B. In that letter, a copy of which is attached for your reference, we expressed concerns with the August 2017 draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) De Minimis Finding ("EIR") prepared by or at the request of the Department. Specifically, we expressed concerns with the EIR's failure to properly address the cumulative adverse effects that the Project, and Alternative 1B in particular, will have on agricultural lands located within the Oakdale Irrigation District and under contract pursuant to the Williamson Act. We also expressed concerns with the EIR's failure to address impacts on local agricultural operations, including but not limited to, the processing operations of ConAgra Foods, a significant Stanislaus County agribusiness and employer.

We suspect that the NCC TEA will follow the direction of the Oakdale and Riverbank City Councils in expressing their preference for Alternative 1B. If the NCC TEA does so, it will be disregarding a number of known negative impacts that have not been addressed by these city governments. Namely, the cities of Oakdale and Riverbank have expressed that Alternative 1B is preferred in part because it purportedly preserves local businesses and creates jobs. This

1301 L Street, Suite 4 • Modesto, California 95354
Tel: 209.554.5232 • Fax: 209.544.1085 • Email: esousa@rodsoulaw.com
www.rodsoulaw.com

finding ignores the impact that Alternative 1B will have on a great number of individuals employed in the agriculture and agribusiness sectors. ConAgra Foods alone employs over 1,000 local residents in the City of Oakdale. Alternative 1B places these 1,000 jobs at risk by taking away land that ConAgra requires for its operations. Though the City of Oakdale generally surmises that it will make ConAgra whole, it does not address how it will compensate for the potential loss of these employees if ConAgra is required to cease or reduce its operations.

Without question, Alternative 1B has the greatest cumulative impact on agriculture and, as such, it poses a significant threat to an integral part of our local economy. Alternative 1B will cause the loss of at least 576 acres of farmland and will permanently impact 540 acres within the Williamson Act. These farming operations are being ignored when assessing the impact on local business as these farmers cannot simply pack up their operations and move to a new location. With farmland becoming increasingly scarce, particularly within the Oakdale Irrigation District, Alternative 1B takes away an invaluable resource. These farmers and their workers cannot so easily be made whole.

Overall, Alternative 1B has the most significant impact on agriculture and agribusiness. As such, it poses the greatest threat to local jobs and local businesses, and it thwarts the policies[1] contained in the City of Oakdale and Stanislaus County General Plans. Coupled with this considerable agricultural and economic impact, Alternative 1B is also the second-most costly alternative and it has the greatest impact on the natural environment and wildlife habitats.

These concerns must not be minimized by the NCC TEA in selecting a route that meets the needs of our community. For the reasons described above, Alternative 1B is not the appropriate route to serve those needs.

Sincerely,

RODARAKIS & SOUSA
A Professional Law Corporation

Eric J. Sousa

Encl.

[1] Such policies include, but are not limited to: County Policy 2.14 (assessing environmental impact of conversion of agricultural lands) and Oakdale City Policies EV-3 (to retain and grow existing businesses), NR-2-1 through 2-3 (to preserve agricultural land), and NR-4 (to preserve water resources, including drainage areas)

50A

RODARAKIS & SOUSA
A PROFESSIONAL LAW CORPORATION

October 16, 2017

VIA U.S. MAIL AND EMAIL (JUAN.TORRES@DOT.CA.GOV)

Juan Torres
Caltrans Central Sierra
Environmental Analysis Branch
P.O. Box 12616
Fresno, CA, 93778-2616

Re: North County Corridor – New State 108 Project and Route Adoption (the "Project")

This office represents John P. Brichetto, a local farmer and landowner affected by the proposed Project. This letter shall serve to convey Mr. Brichetto's opposition to the Project in its current form and to provide his comments and concerns regarding the August 2017 draft Environmental Impact Report/Environmental Impact Statement and Section 4(f) De Minimis Finding ("EIR") prepared by the State of California Department of Transportation ("Department"). Since the outset of this Project, Mr. Brichetto has raised a number of concerns as to the impact of this Project on local agriculture and business. Unfortunately, most of those concerns remain unaddressed in the draft EIR, which does not mitigate certain negative consequences to the community of Oakdale and the greater Stanislaus County region. As such, this office addresses some of the more egregious concerns, as set forth below. Notably, the concerns raised herein do not represent an exhaustive list of the comments regarding the EIR or objections to the overall Project. Mr. Brichetto reserves the right to present additional comments or opposition at a later date, including any concerns raised by his fellow residents and other interested persons.

50A

Failure to Properly Address Cumulative Adverse Effects of Loss of Agricultural Lands.

From Mr. Brichetto's perspective, the most glaring omission from the EIR is any concrete analysis of the effects of this Project on valuable and increasingly scarce agricultural land in our region. Each of the routes proposed will take a substantial portion of agricultural land out of use, including prime farmland, farmland of statewide importance, and farmland within the Williamson Act. The route preferred by local leaders, Alternative 1B, will have the most dramatic cumulative impact on local farmland. Route 1B will cause the loss of 576 acres of farmland and will permanently impact 540 acres within the Williamson Act. The EIR does not

1301 L Street, Suite 4 • Modesto, California 95354
Tel: 209.554.5232 • Fax: 209.544.1085 • Email: bbarnes@rodsoulaw.com
www.rodsoulaw.com

and cannot adequately account for this loss because this impact cannot be mitigated. On page 449 of the EIR, the Department notes that this Project will "*potentially result*[] in an incremental loss of this resource." (emphasis added.) In reality, this Project *will undoubtedly result* in the actual and immediate loss of 576 acres of farmland.

50A

Failure to Properly Mitigate Adverse Effects of Loss of Agricultural Lands.

In this regard, the EIR's mitigation proposals are idle. The EIR proposes replacement of agricultural land at a 1:1 ratio "where feasible." In truth, this 576 acres of valuable, scarce farmland, much of which lies within the coveted Oakdale Irrigation District, will be lost and *cannot* be replaced. Though a supposed mitigation policy is presented, it is unclear whether any such policy can and will be applied by each locality uniformly. Moreover, because this policy is not imposed as a separate mitigation measure and is not included in the Project Description where it can be built into the Project, it provides little assurance. Quite plainly, the draft EIR does not adequately address the cumulative losses of farmland in Stanislaus County and in the separate communities of Oakdale, Modesto, and Riverbank.

50B

Failure to Properly Address and Mitigate Cumulative Adverse Effects of Loss of Existing Williamson Act Contracts.

The EIR also distorts the effect that this Project will have on acreage within the Williamson Act, which serves to promote voluntary land conservation, particularly farmland conservation. The EIR states that the Department is not required to complete further notice and review requirements under CEQA because no *one parcel* affected by the Project exceeds 100 acres. However, the EIR also notes that the Project may require cancellation of Williamson Act contracts with property owners who own multiple parcels, each of which are less than 100 acres, but which may cumulatively result in the cancelation of more than 100 acres of Williamson Act contracts for an individual property owner. According to the EIR:

> …there are no feasible avoidance, minimization, mitigation, or design measures that could be implemented to diminish potential impacts on Williamson Act-enrolled lands. While the project will be mitigating for impacts to farmland, *the project will still be removing large quantities of farmland from the existing community, including potentially unavoidable significant impacts to Williamson Act farmlands*. Therefore, even with mitigation, there would be a *significant and unavoidable impact* to farmland.

50C

(emphasis added.) Overall, under Route 1B, 89 parcels and 540 total acres of Williamson Act property will be affected by the Project.[1] This favored route (1B) has the most substantial impact to agriculture property within the Williamson Act. Again, the EIR provides no analysis as to the cumulative effect of such loss nor does it provide any means by which mitigation can assuage

[1] As compared to 75 parcels/305 acres under Alternative 2A, 72 parcels/351 acres under Alternative 1A, and 77 parcels/495 acres under Alternative 2B.

these concerns and preserve the policies contained in the Stanislaus County and City of Oakdale General Plans. This is wholly insufficient and is inconsistent with the needs and goals of these communities.

50C

Failure to Properly Address and Mitigate Adverse Effects of Loss of Agricultural Lands on Operations of Local Farmers.

The impact of this loss of agricultural land is real and the effects will be drastic. Though certain effects are known, the draft EIR provides little mention of and no answers to these inevitable results. By way of example, there is no denying that this Project and the route preferred (Alternative 1B) will affect Mr. Brichetto's land and farming operations. Route 1B threatens to take over 100 acres of Mr. Brichetto's land and render another 100 acres or more useless. Overall, Route 1B will impact at least 32 parcels that Mr. Brichetto owns or leases. As to the farmland that remains, Mr. Brichetto's operations will be permanently and substantially affected. Route 1B likely will cause the removal of wells, pumping stations, and irrigation lines that service hid properties, requiring substantial reinvestment. It will also dissect or bisect Mr. Brichetto's properties, resulting in a substantial increase in recurring operational costs, greater liability exposure, decreases in the farmable portion of his properties, and other ongoing operational inefficiencies. It is likely that many other farmers will suffer the same fate. In response to these concerns, the EIR generally states that, access will be "constructed where feasible" to allow bisected land to remain viable for farming operations. This statement provides little by way of mitigation and minimal assurances that local farmers will be able to use their land efficiently and without experiencing the ongoing financial and practical burdens of this Project.

50D

Failure to Properly Address and Mitigate Adverse Effects of Loss of Agricultural Lands on Operations of Local Businesses and Surrounding Community.

In addition, the loss of farmland required by Alternative 1B will also drastically impact the community by placing ConAgra's operations in jeopardy. As discussed by Mr. Brichetto in meetings with your Department, over 1,100 acres of his property is used by ConAgra to dispel waste water from its food processing operations pursuant to an Order by and detailed requirements of the California Regional Water Quality Control Board. ConAgra invested substantial capital into developing this system, which permits certain flows of waste water based upon the land available, to comply with the Board's requirements and to prevent overloading any one area of land. Route 1B will take or render useless over 200 acres of Mr. Brichetto's property that was used by ConAgra for this purpose. The taking of this property will reduce the surface area available to ConAgra to dispel its waste water, potentially impacting soils conditions, groundwater conditions, and requiring the Water Board to impose new requirements. It will also affect ConAgra's ongoing operations, making it impracticable, if not impossible, to operate at its current capacity with no place to dispel all of this waste water. These losses may also cause ConAgra to call into question the viability of its operations and may jeopardize the employment of *over 1,000 individuals* whom the company employs. At the very least, these foreseeable

50E

effects must be addressed and mitigated to the full extent possible, which the draft EIR wholly fails to do.

50E

Failure to Properly Address and Mitigate Adverse Effects of Loss of Habitat to Endangered Species.

As a final point, it is also surprising that the EIR makes only brief mention of certain endangered species and habitats that will be affected by the proposed acquisition, including endangered vernal pools, amongst others, without providing any further assessment. Ostensibly, the Department is waiting until a later date to learn the true effect of this Project on these species. This represents yet another environmental impact of this Project that remains unanswered.

50F

By asserting his opposition to the Project as presented and as reflected in the EIR, Mr. Brichetto requests that your Department address the concerns contained herein and, if the Project progresses, select a route that minimizes the impact to local agriculture. Please feel free to contact our office should you wish to discuss this matter further.
Sincerely,

RODARAKIS & SOUSA
A Professional Law Corporation

Brandy L Barnes

Brandy L. Barnes

cc: philip.vallejo@dot.ca.gov

Response 50 to Brandy J. Barnes and Eric J Sousa: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Response 50A: Further discussion with ConAgra since circulation of the Draft Environmental Document and engineering analysis has determined that, with slight modifications to the design during final design and additional analysis, the irrigation demands can be met even with the proposed acquisitions.

Loss of lands will be mitigated through the fair purchase and relocation of comparable lands. Right-of-way acquisition will take into account potential additional and specific impacts to the property and will be addressed and/or fairly compensated for by Stanislaus County and Caltrans during the final phase of the right-of-way negotiations. Displaced businesses will be relocated within the county. Businesses requiring relocation will be provided relocation assistance payments and advisory assistance in accordance with the Caltrans Relocation Assistance Program (RAP), based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Title 49 Code of Federal Regulations Part 24. Details are provided in Section 3.1.4.2, Relocation, of the NCC Final EIR/EIS.

Brichetto's opposition to Alternative 1B has been noted and will be included in the Final Environmental Document; however, The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Section 3.1.3, Farmlands, of the environmental document states the project would result in adverse impacts to agricultural resources and could not be fully mitigated, which resulted in the preparation of an NCC Final EIR/EIS. The project has been designed to be consistent with state, regional, and local plans and programs to the extent feasible. During final design, effort would be made to further avoid, minimize, and/or mitigate construction and operational impacts to existing farmland and be consistent with Stanislaus County policies.

Various types of agriculture are anticipated to be affected by all four Build Alternatives under consideration. Due to the frequency of mixed-use properties (farmland and residential) in the area, it is anticipated that businesses, residential owners and tenants, and employees working on a farmland would be relocated. In addition, disruption to critical structures such as irrigation lines and other facilities vital to farm activities are anticipated. Partial impacts to these facilities have the potential to render affected commercial farms as fully relocated. Under Alternative 1B, approximately 130 acres of ConAgra northern irrigation land would be removed and potentially have its water irrigation access impacted from the interchange, frontage roads, and change in grade. The types of impacted agricultural lands are shown in Table 3.1.4.2-3 of the NCC Final EIR/EIS.

Response 50B and 50C: The project area includes Prime Farmland and Farmland of Statewide Importance, discussed in Section 3.1.3 of the NCC Final EIR/EIS – Farmlands. Construction of all four Build Alternatives would directly affect between 397 and 576 acres of designated

farmland, potentially resulting in an incremental loss of this resource. Also, according to CEQA Guidelines, Section 15206, cancellation of Williamson Act contracts for parcels exceeding 100 acres is considered to be “of statewide, regional, or area wide significance.” The project is anticipated to require cancellation of at least one or more Williamson Act contracts, including Williamson Act contracts with property owners that own multiple parcels which individually are less than 100 acres, but cumulatively could total to a cancelation of more than 100 acres of Williamson Act contracts for an individual property owner. Even though in some instances impacted Williamson Act properties may stay enrolled in the Williamson Act program, there are no feasible avoidance, minimization, mitigation, or design measures that could be implemented to diminish potential impacts on Williamson Act-enrolled lands. While the project will be mitigating for impacts to farmland, the project will still be removing large quantities of farmland from the existing community, including potentially unavoidable significant impacts to Williamson Act farmlands. Therefore, even with mitigation, there would be a significant and unavoidable impact to farmland.

Existing policy within Stanislaus County provides for conversion of farmland to non-farmland uses to be mitigated by preserving an equal amount of agricultural land within the county in those areas that have not been approved or proposed for urban uses. Implementation of the following measures by Stanislaus County will ensure farmland impacts are minimized:

- Conversion of farmland to non-farmland uses will be mitigated by preserving an equal amount of agricultural land within the County in those areas that have not been approved or proposed for urban uses. This is consistent with Stanislaus County’s current policy in the Farmland Mitigation Program Guidelines of requiring 1:1 replacement for agricultural land impacted by proposed projects where feasible.
- If 1:1 replacement is not available in the County, agricultural easements administered by land trusts (examples include Ducks Unlimited, The Nature Conservancy, American Farmland Trust) or other non-profit entities on agricultural parcels will be considered as a means to mitigate for the permanent loss of agricultural land within the Stanislaus County region.
- Mitigation at a 1:1 ratio for acquired agricultural lands will be accomplished through purchase of credits through an organization such as the Agricultural Land Stewardship Program established by the California Farmland Conservancy, administered by the Division of Land Resource Protection, to mitigate for the permanent loss of agricultural land within the Stanislaus County region. The Agricultural Land Stewardship Program is a grant program that aids in purchasing and/or partially funding agricultural easements. Under this program, any property proposed for easement must meet certain criteria (e.g., location, soil quality, water availability) that make it a priority for the potential easement holder organization to pursue an easement. If the potential easement holder wishes to pursue an easement on the proposed property, the organization would negotiate terms with the landowner, including price (unless the easement is to be donated) and restrictions. If the easement is to be purchased, the potential easement holder may seek grant funding under this program.

- Where parcels are bisected by a segment of the proposed project, but enough usable land remains on either side of the highway to be cultivated, access for livestock, machinery, and/or drainage shall be constructed where feasible in order to provide access to both portions of the property so that the land is still viable for farming operations.

Loss of lands will be mitigated for through the fair purchase and relocation of comparable lands. Right-of-way acquisition will take into account potential additional and specific impacts to the property and will be addressed and/or fairly compensated for by Stanislaus County and Caltrans during the final phase of the right-of-way negotiations. Displaced businesses would be relocated within the county. Businesses requiring relocation will be provided relocation assistance payments and advisory assistance in accordance with the Caltrans Relocation Assistance Program (RAP), based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Title 49 Code of Federal Regulations Part 24. Details are provided in Section 3.1.4.2, Relocation, of the NCC Final EIR/EIS.

Response 50D and 50E: Further discussion with ConAgra since circulation of the environmental document and engineering analysis have determined that, with slight modifications to the design during final design and additional analysis, the irrigation demands can be met even with the proposed acquisitions.

Under Alternative 1B, approximately 130 acres of ConAgra northern irrigation land would be removed and potentially have water irrigation access impacted from the interchange, frontage roads, and change in grade. Displaced businesses will be relocated within the county. Businesses requiring relocation will be provided relocation assistance payments and advisory assistance in accordance with the Caltrans Relocation Assistance Program (RAP), based on the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Title 49 Code of Federal Regulations Part 24.

The project is designed to accommodate future population and economic growth in northern Stanislaus County. Implementation of the North County Corridor would benefit businesses in the study area by reducing travel times, increasing the average operating speeds, and improving travel time reliability. The project would also improve goods movement efficiency at a regional level, which would strengthen the agricultural and general economy of Stanislaus County.

Response 50F: Impacts to endangered species habitat are disclosed in Section 3.3.5 – Threatened and Endangered Species, of the NCC Final EIR/EIS. A Natural Environment Study was completed for the proposed project in May 2017 and includes discussion and analysis of habitat and endangered species.

Final mitigation ratios for impacts to state and/or federally listed species have been determined through consultation with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. Mitigation will occur through the purchase of mitigation credits from an approved mitigation bank or banks and/or through creation of a project-specific mitigation site.

Comment 51
Comment from Barnes, Elizabeth and Jay

RECEIVED
OCT 04 2017
BY:

Caltrans

North County Corridor

Name (Please print): Jay & Elizabeth Barnes Date: 9/7/17

Mailing address: 12942 Hwy 120

Phone: 404-2852 Email: matherpack@aol.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

Q? 1) Have there been safety studies regarding the feasibility of "roundabouts" on busy highways in other parts of the U.S? 51A

Q? 2) Are they (state of Ca.) selling the land formally purchased when the bypass was to come from the North? 51B

Comment 3. The dangerous stretch of 120/108 to the east of the bypass tie-in will not be eliminated. At least weekly there is a serious accident on that stretch of road! 51C

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response to Elizabeth and Jay Barnes: Thank you for your comments; they have been included in the Final Environmental Document.

Response 51A: Roundabouts were selected through preparation of an Intersection Control Evaluation (ICE) summary, per Caltrans Policy Directive 13-02 (Traffic Operations Policy Directive), which was performed at each of the proposed at-grade state highway intersections to identify the most effective intersection traffic control strategy (i.e., roundabout or traffic signal). Signalized and Unsignalized Intersection Design and Research AID (SIDRA) software package operations tools were also used for assessing effectiveness of roundabouts at the proposed intersections.

According to the Federal Highway Administration, roundabouts have been "proven safer and more efficient than other types of circular intersections" (https://safety.fhwa.dot.gov/intersection/innovative/roundabouts/). The Federal Highway Administration website provides case studies regarding the effectiveness of roundabouts in California, Colorado, Florida, Kansas, Maine, Maryland, South Carolina, and Vermont. More information can be found at the following website: https://www.fhwa.dot.gov/research/deployment/roundabouts.cfm.

Response 51B: The sale of land previously purchased by the State will be handled under a separate contract by Caltrans.

Response 51C: The proposed project does not extend farther east along State Route 120/State Route 108. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 52
Comment from Barzan, Richard

October 12, 2017

Caltrans District 6

Attention Juan Torres

Chief, Central Sierra Environmental Analysis Branch

P.O. Box 12616

Fresno, CA 93778-2616

RE: North County Corridor Project

Dear Mr. Torres:

I am the owner of a light industrial project located at 5150 Pentecost Drive, Modesto, CA which will be impacted by the proposed North County Corridor Project. I wanted to express my concern regarding the elimination of the access to Kiernan Road via Pentecost Drive. This will exacerbate the access issue for this area and leave only one point of ingress and egress via Charity Way from this area which I believe to be insufficient. It was my understanding that Stanislaus County was planning on the installation of a street light at the intersection of McHenry Avenue and Charity Way which should completed upon construction of the proposed project.

Should access to Kiernan Road be eliminated I would also request that the frontage road located along the north side of the expressway be extended to Carver Road. This would provide two points of ingress and egress to the lands located between McHenry Road and Carver Road.

Please add these comments to the permanent record opposing the Project as presently proposed.

If you have any questions please feel free to contact me at 209-765-0997 or my e-mail at Oakdalerick@yahoo.com.

Sincerely,

Richard Barzan

Response 52 to Richard Barzan: Thank you for your comments; they have been included in the Final Environmental Document.

As shown in Table 3.1.6-9, for peak hour intersection operation at McHenry Avenue/Charity Way, the intersection will continue to operate through the year 2042 at LOS A during the morning peak hour and at a LOS B or better during the afternoon peak hour. Property owner discussions have resulted in a variety of potential additional access methods. These access methods are preliminary and will be further analyzed by Stanislaus County and Caltrans during final design and right-of-way negotiations. There are two methods of restoring multiple points of access, which will likely be either through extending existing access from Tunson Road to Tully Road or by extending their access to the north toward Thieman Road over the MID Main Canal.

Comment 53
Comment from Bevan, Jon

Caltrans

North County Corridor

108

Name (Please print): Jon Bevan **Date:** 9-7-17

Mailing address: 16400 Dixon Rd Oakdale CA-95361

Phone: 209-559-8737 **Email:**

☐ **Please add my name to the North County Corridor Project mailing list.**

I would like the following comments filed in the record. (Please print.)

Frontage Rd on 1B + 2B add to environmental impact and are not allowed to access property. This would give this option 1B/2B & above favorite report -

Round About South of [illegible] is not needed

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@bucthepr.com

Caltrans

North County Corridor

Name (Please print): Jon Bevan Date: 9-7-17

Mailing address: 10400 Dixon RD

Phone: 209-559-8737 Email: JonBevan@Hotmail.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

I Would Prefer Alt 1B or 2B-
Less Business impact (Greater Tax Value)
Less Home impact - (Home Have Greater Tax Value)
Less Noise To Residents From Trucking Operation
Best Climate Change Option -
Best Alignment For Future Projects (Leaves Land
& Allows Room) First Round About is Next
To A Slow (40 mph) Curve, Better For
Trucking and Accident Reduction-

Farm Land is At A Lower Tax Rate Vs
Homes and Business Property

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 53 to Jon Bevan: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 54
Comment from Boyett Petroleum

BOYETT PETROLEUM

September 22, 2017

Juan Torres, Senior Environmental Planner
California Department of Transportation
855 M Street, Suite 200
Fresno, CA 93721

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
#7010 1060 0000 4184 1469

Subject: North County Corridor Environmental Impact Report / Environmental Impact Statement – Response to Comments

Dear Mr. Torres:

Stan Boyett & Son, Inc. dba Boyett Petroleum ("Boyett Petroleum") is a Modesto-based fuel distributor and retailer that owns and operates several nationally and regionally branded fuel stations / convenience stores in the upper San Joaquin Valley and Sierra Foothills of Northern California. Boyett Petroleum is the owner of the Cruisers-branded outlet at 4391 McHenry Avenue in unincorporated Stanislaus County, just north of the City of Modesto. The outlet occupies approximately 0.85 acre of the southwest quadrant of the Kiernan Avenue (State Route 219) and McHenry Avenue (State Route 108) intersection, and features a convenience store, car wash, and 6 fuel pumps (12 fueling positions) under a canopy. Driveway access is available from both Kiernan Avenue and McHenry Avenue

The California Department of Transportation ("Caltrans") issued a Joint EIR/EIS for the North County Corridor / New State Route 108 Project and Route Adoption Project in August 2017. The EIR/EIS identifies four "build" alternatives (1A, 1B, 2A, and 2B) for the North County Corridor that would link SR-219 near Modesto and SR-120 near Oakdale. All four alternatives would require expansion of the State right-of-way along Kiernan Avenue by at least 50 feet of each side of the roadway. The EIR/EIS lists Cruisers as a business affected by displacement in Table 3.1.4.1-10 and notes that "Full Acquisition" and "Relocation" will be required in Table 3.1.4.2-4.

601 McHenry Ave. • Modesto, California 95350 • (209) 577-6000 • (209) 577-6040 FAX
1-800-545-9212 • www.boyett.net

EIR/EIS Tables 3.2.5-4, 3.2.5-5, 3.2.5-6, and 3.2.5-7 show that average annual daily traffic volumes will increase substantially at the Kiernan Avenue / McHenry Avenue intersection under the "No Build Alternative." Given that we serve the traveling public, these traffic volumes effectively represent our current and future customer base for our 4391 McHenry Avenue outlet.

The Cruisers outlet on McHenry serves as Boyett Petroleum's largest income producing site which will not be easily replaced given the route alternatives presented by the EIR/EIS. Furthermore, given the current proposed budget set forth in the EIR/EIS, it is a foreseeable certainty that Cal Trans does not have an accurate or adequate budget to compensate Boyett Petroleum for the earning potential and value of this outlet. Thus, pursuant to EIR/EIS Measure RLC-1, we would like to engage Caltrans as early as possible regarding relocation of our outlet at 4391 McHenry Avenue and valuation of our outlet. We desire to stay as close to the planned SR-108/McHenry Avenue interchange as possible, but are willing to consider other options such as a land exchange elsewhere within our service region. It is paramount to Boyett Petroleum that any relocation package offered by Caltrans maintains, at a minimum, the maximum earning capacity currently recognized at the McHenry outlet. 54A

Also, we note that EIR/EIS Measures CR-1, HW-2, BIO-13, and BIO-40 (and perhaps others) will likely require Caltrans personnel or consultants to access our property to conduct surveys or investigations while Cruisers is still in business. This will require coordination and respectfully ask for sufficient advance notice. 54B

In closing we wish to have a positive and productive working relationship with Caltrans as the planning, design, and construction process for the North County Corridor progresses. On that note, we would like to request early consultation with Caltrans in regards to the proposed relocation of our property. Because a rather vague mitigation measure was presented for relocation, we would also like further clarification and details as to how Caltrans is intending to formally engage with Boyett Petroleum in this regard in accordance Mitigation Measure RLC-1. 54C

If you have any questions or need additional information, please do not hesitate to contact me at (209) 577-6000 or via email at khollowell@boyett.net.

Best regards,
BOYETT PETROLEUM

Kathleen H. Hollowell
Chief Legal Officer

cc: Dale Boyett, President

601 McHenry Ave. • Modesto, California 95350 • (209) 577-6000 • (209) 577-6040 FAX
1-800-545-9212 • www.boyett.net

Response to Boyett Petroleum: Thank you for your comments; they have been included in the Final Environmental Document.

Response 54A: Caltrans, in coordination with Stanislaus County, and the Cities of Modesto, Riverbank, and Oakdale, shall implement all property acquisition and relocation activities in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) of 1970 (Public Law 91-646, 84 Stat. 1894). The Uniform Act mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced by the project. The Uniform Act provides uniform and equitable treatment by federal or federally assisted programs of persons displaced from their homes, businesses, or farms, and establishes uniform and equitable land acquisition policies. See Appendix E in Volume 2 for more information on the Caltrans Relocation Assistance Program. Also, Mitigation Measure RLC-1 (Section 3.1.4.2) includes measures that may be considered by Caltrans for incorporation into the relocation plan to minimize impacts to displaced businesses and residences. Accordingly, acquisitions would be conducted as necessary to build the approved project, and displaced residents would be provided just compensation in accordance with the Uniform Act.

Response 54B: Any necessary permissions to enter will be requested with sufficient advanced notice to allow for Boyett Petroleum to accommodate the environmental surveys.

Response 54C: Final acquisitions and relocations will be determined by Stanislaus County and Caltrans during the final right-of-way and design phase of the project by Stanislaus County and Caltrans. Any acquisitions as a result of the project will be fairly compensated for, including relocation and reestablishment of the affected Cruisers-brand outlet. Right-of-Way staff will coordinate with property owners at the appropriate time in the project’s development.

Comment 55
Comment from Brentlings, David

Caltrans

North County Corridor

Name (Please print): David Brentlings Date: 7 SEPT 17

Mailing address: 2256 Gallery Drive Riverbank 95367

Phone: 808. 223. 3583 Email: EARTHREACHHAWAIIC gmail. com

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

Pleased with Level of Effort on the project.
Try to consider NOT Condemning Historic properties along prefered corridor, as Tay have special interest in those Families

Also - I would like to have access to all public comments provided by communities to Caltrans on this most recent Round of communits involvement (last 2 years)

Mahalos
David

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 55 to David Brentlings: Thank you for your comments; they have been included in the Final Environmental Document with all other public comments available to the public.

The project does not anticipate the impacts to any historic properties along the corridor which would necessitate condemnation. There are five historic properties within the Area of Potential Effects, including two properties, the Sierra Railroad Mainline and adobe shop building at 3212 Claribel Road, were determined eligible for the National Register of Historic Places/California Register of Historic Places, one property, the Riverbank Army Ammunition Plant District, was previously determined eligible was assessed and found to be still eligible, and two properties, the Hetch-Hetchy Aqueduct, Moccasin-Newark Transmission Tower Line, and Warnerville Substation, and Modesto Irrigation District, were assumed eligible for the purposes of this project only, per VIII.C.4 of the Section 106 Programmatic Agreement. The project will not directly affect the Sierra Railroad, but would have a visual effect due to a necessary overcrossing. Similarly, the project will have no direct effects on the Riverbank Army Ammunition Plant District or any of its contributing resources and will have no adverse visual effects from the project; however, the road widening would have a minor indirect effect on the historic resource's setting but would not change the characteristics of the industrial plant. The project will have no direct effects to the adobe shop building, or any other structure, within the parcel at 3212 Claribel Road; however, the introduction of an overcrossing and new roadway would have an indirect effect on the historic resource's setting but this indirect effect would not change the characteristics of the historic structure that make it eligible. The project will have minimal direct effects to the Hetch-Hetchy Aqueduct, Moccasin-Newark Transmission Tower Line, or the Warnerville Substation and a minor indirect effect on the historic resource's setting, but would not change the characteristics of the resource that make it eligible. The preferred alternative, Alternative 1B, will cross the resource 12 times (two major crossings and 10 minor crossings) and require the relocation of eight valve boxes.Additionally, the project will have a direct effect to the Modesto Irrigation District Modesto Main Canal and Lateral No. 6, in which the North County Corridor will cross over the resource three times, including two elevated crossings and one at-grade crossing; however, the project will not adversely affect the function of the canal or affect the eligibility. See Chapter 3.1.8 for further information regarding the proposed impacts Cultural Resources, which avoid condemnation of any historic properties.

Section 5.3 of the NCC Final EIR/EIS notes the public participation of the project. A public hearing took place on September 7, 2017 during the environmental document public circulation period. Written comments were also received from the public at this time. These comments are included in the NCC Final EIR/EIS and Section 4(f) Evaluation. The final environmental document has been modified to reflect substantive public and agency comments, responses to comments, and decisions.

Comment 56
Comment from Brunn, Gerald E. of Law Offices of Brunn & Flynn

BRUNN & FLYNN
ATTORNEYS

LAW OFFICES

A Professional Corporation
AV-Preeminent Rated

Charles K. Brunn
Timothy T. Flynn
Gerald E. Brunn
Michael G. Donovan
Mahanvir S. Sahota
John K. Peltier
Geoffrey W. Hench
Violaine C. Brunet

928 12th Street, Suite 200
Modesto, CA 95354
Phone: (209) 521-2133
Fax: (209) 521-7584
www.brunnandflynnlaw.com

e-mail: gbrunn@brunn-flynn.com

October 13, 2017

Mr. Juan Torres **(VIA UPS OVERNIGHT MAIL)**
Caltrans District 6
855 M Street, Suite 200
Fresno, CA 93778-2616

Mr. Matt Machado, Authority Manager **(VIA HAND DELIVERY)**
North County Corridor Transportation Expressway Authority
Stanislaus County Public Works Department
1716 Morgan Road
Modesto, CA 95358

Re: Opposition to Current Proposed Positioning of NCC Route – Oakdale and Claribel Roads, and Recommendation

Dear Mr. Torres and Mr. Machado:

We represent Wolfgang and Victorina Bach. They own approximately 23 acres at 4712 Oakdale Road in Modesto. The proposed North County Corridor Project (Tully Road to SR-120) ("NCC") will impact their property significantly, as the current proposal will require loss of much of their property, including their home.

We urge Caltrans, the County and North County Corridor Transportation Expressway Authority ("the Authority") to consider an alternate NCC Route. Claribel Road could be widened to accommodate the Project. There is no need to build a new curved roadway that negatively impacts our client's property and the property of their neighbors when the new roadway could be built on the existing Claribel Road certainly at a lower cost, and with less impact on privately owned property since the infrastructure is already in place.

Because there is another alternative that is less disruptive and prevents the loss of the Bachs' property, and other adjacent properties, the County, and Authority should seriously consider it.

Thank you for your attention to this matter.

Very truly yours,

LAW OFFICES OF BRUNN & FLYNN
A Professional Corporation

V. Brunet
for GERALD E. BRUNN

GEB
Cc: Wolfgang and Victorina Bach
K:\docs\cases\1143-14189\StanCtyPublicWorks10-13-17

Response 56 to Gerald E. Brunn of Law Offices of Brunn & Flynn: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Prior to analysis of the four proposed Alternatives 1A, 1B, 2A, and 2B, and the selection of 1B as the preferred alternative, 18 other alternatives were also considered in an Alternative Analysis Report; however, they were eliminated due to the excessive environmental impacts that would have been caused from their selection.

As part of the Alternative Analysis Report, the alternatives were screened through a preliminary screening process that focuses on determining if a specific alternative will meet the 2030 traffic needs and if any major engineering considerations would affect the safety or function of the facility. From this preliminary screening, 18 alternatives were considered during the alternative screening process.

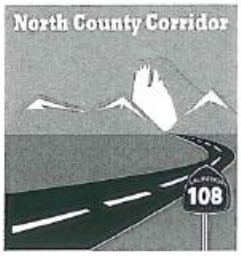
Seven broad-based criteria of the Project Development Procedures Manual were used to screen the initial Build Alternatives. These criteria include the following:

- Purpose and need: Would the alternative meet the project's purpose and need?
- Excessive project cost: Would the alternative result in a substantially higher overall cost?
- Relocations and acreage: Would the alternative require excessive removal of businesses, residences, or urban or rural acreage?
- Operational or safety problems: Would the alternative result in operational or safety problems?
- Adverse social, economic, or environmental impacts of extraordinary magnitude: Would the alternative disrupt or divide an established community or result in economic or social impacts?
- Cumulative impacts: Would cumulative impacts result due to relocations, operational or safety problems, or social, economic, and environmental impacts?
- Rejected at an earlier stage: Was the alternative rejected at an earlier stage of project development?

Ultimately, the four chosen alternatives were found to best meet the purpose and need of the NCC project. Please refer to Section 2.6 of the NCC Final EIR/EIS for more information regarding all alternatives explored.

Comment 57
Comment from Bryant, Fran and Dan

Caltrans



RECEIVED
SEP 18 2017
BY:

Name (Please print): FRAN & DAN BRYANT Date: 9-18-17

Mailing address: P.O. Box 1564, OAKDALE, CA 95361

Phone: 209-847-4024 Email: fran7777@sbcglobal.net

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

We appreciate the opportunity for input to the eventual planned Oakdale Bypass route. This has been a long time coming! Currently, Stearns Road, where we live between Sierra Road & Warnerville Road, is the unofficial bypass from Tuolumne County and parts east, to the west of us.

We have been aware of numerous serious, sometimes fatal, accidents near our property, & constant excessive speeding of motorists in front of our home. God help us all, if an animal gets out on the road! Dan is currently a witness in a near fatal accident lawsuit which occurred in May, 2016, in which a "crotch rocket" motorcyclist suffered permanent brain damage & will need total care for the rest of his life because of his excessive speed! A tractor driver was exiting a neighbor's property when the motorcyclist was going as fast as he could, south from Sierra Road, saw the tractor too late, & wrecked disastrously.

We must stand out in the roadway as lookouts in order to safely exit our property.
We are awakened all hours of the night by motorcyclists & motorists speeding at 90 mph Past our house.

Our area is a ranching/farming area with residences all along the road. We do not want this bypass anywhere near our 6 acre property! We have been here for over 41 years. When we moved from Oakdale to our ranchette, we could safely allow our children to ride up & down the road on their bicycles. We rode our horses from our house to the Warnerville area & even to town. Not any longer! Dan is careful to listen for vehicles going recklessly & at high rates of speed when he is at or near the roadway. He often backs away from our fenced yard near the road due to fear of injury by passing vehicles!

A bypass near the back of our property will be just as harrowing! We have horses and our neighbors have children & animals which will be put in the same dangers as we are experiencing now! We have lost numerous pets up & down the road because of excessive speed & constant traffic!

We are sick to death of the noise & fear of injury!

We would choose the bypass farthest east, away from our area! There are many small ranchettes, orchards, homes, businesses, & ranch properties on or near Stearns Road. We are to the point of lawsuit against the county & state to stop the bypass from the Stearns Road area alternative!

It does not make sense to buy more expensive properties along this route, when property farther east would be much cheaper! It does not make sense to disrupt the lives of the many who live near this route, when going farther east would cause the least local resistance and fewer lawsuits! It does not make sense to build closer to town when infill will be the inevitable result! We certainly do not want fast food restaurants motels or gas stations added to our area!

Fran & Dan Bryant

Response 57 to Fran and Dan Bryant: Thank you for your comments; they have been included in the Final Environmental Document.

The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative, which takes the alignment further out to Wamble Road and up to Lancaster Road, thus avoiding the South Stearns Road community. As mentioned in Section 3.1.6 of the NCC Final EIR/EIS, traffic is anticipated to decrease on local roads and function at improved levels of service.

Comment 58
Comment from Burchell, Tom, The Burchell Nursery, Inc.

THE
BURCHELL
NURSERY
INC.

SEP 28 2017 PM 2:57

Matt Machado
County Public Works Department
1716 Morgan Road
Modesto, CA 95358

September 25, 2017

Dear Matt:

Thanks for taking time to talk to us at the recent Oakdale open house to present the various bypass options. As we told you then, and pointed out on the maps, the 1B and 2B options seriously affect The Burchell Nursery's function and flow for propagating nursery stock. We plant on a three year rotation. Each year we farm between 150 and 200 acres of nursery trees, depending on the anticipated market and varieties being grown. The "B" options both take what we view as about 70 acres from our direct farming options, and probably more acreage as it is impacted by other accesses, rights of way and construction issues.

I will not declare categorically that this would put us out of business in Stanislaus County, but I can assure you that it would seriously impact us and compromise how we do business. As one of the larger employers in Eastern Stanislaus County we regularly employ upwards of 250 workers annually. If the proposed bypass receives approval and funding as presented for either route 1B or 2B we will seriously have to consider the future of our business. Our options include downsizing (less employees) and/or moving much of our growing to Fresno County where we operate a secondary nursery (moving employees out of Stanislaus County).

None of these are pleasant thoughts. At the same time we recognize the overdue needs for a reasonable bypass and lessened traffic. We suffer from those traffic issues on holidays and many weekends ourselves.

We will keep our options open, but we want to go on record to state how the "B" options would affect the future of our business as presented.

Very truly yours,

The Burchell Nursery, Inc.

Tom Burchell, President & CEO

Main Office
12000 State Highway 120
Oakdale, CA 95361-8887
(800) 828-TREE • (209) 845-8733 • Fax (209) 847-1972

Fresno Office
6705 S. Clovis Ave, Fowler, CA 93625
(559) 834-1661 • Fax (559) 834-1509
N CA, OR, WA Contact: (530) 776-7605

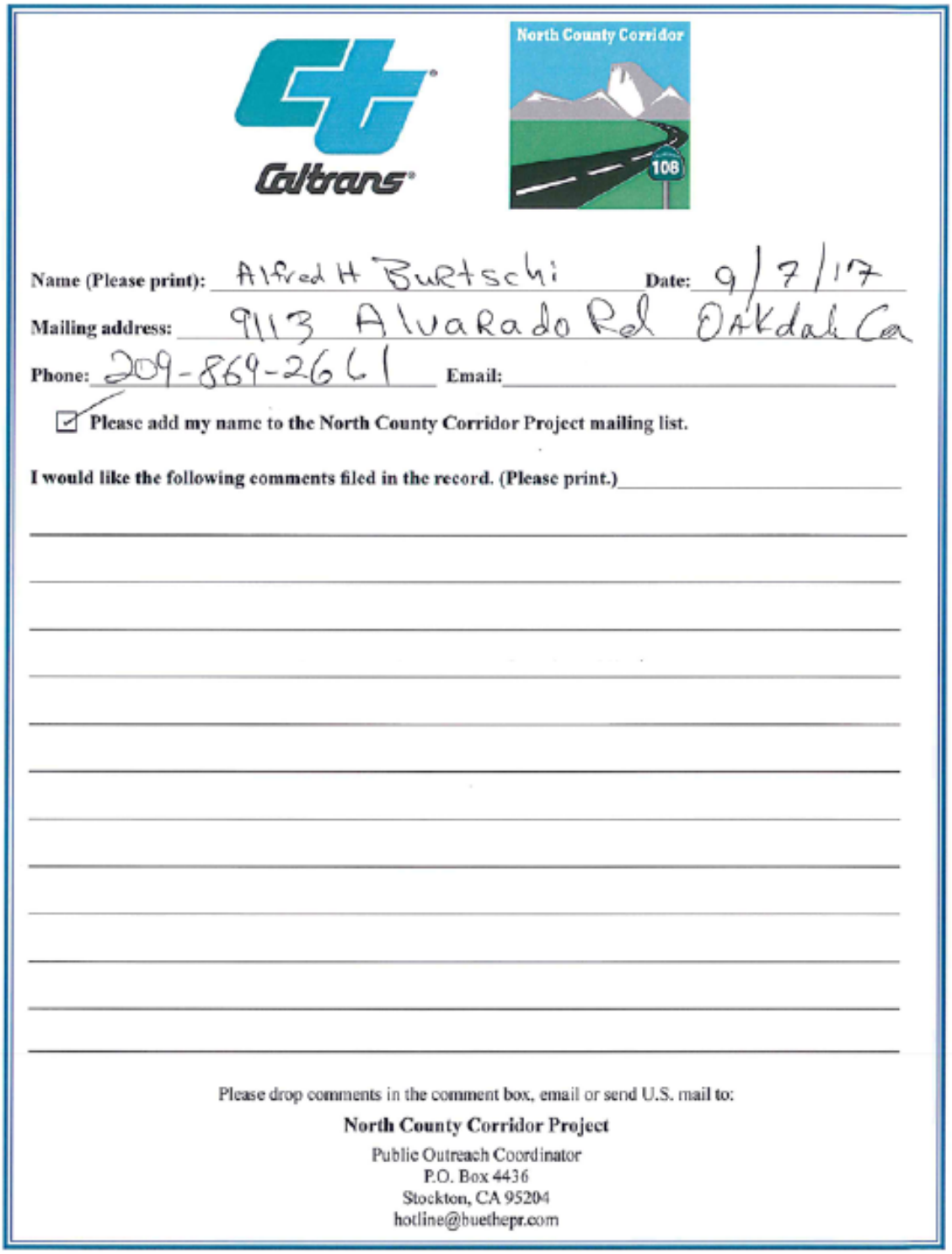
Website: www.burchellnursery.com • E-Mail info@burchellnursery.com

Response 58 to Tom Burchell of The Burchell Nursery, Inc.: Thank you for your comments; they have been included in the Final Environmental Document.

The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. We understand your concerns regarding this project and the potential for it to change the existing character of businesses and neighborhoods. Right-of-way acquisition will take into account potential additional and specific impacts to the property or business and will be addressed and/or fairly compensated for by Stanislaus County and Caltrans during the final phase of the right-of-way negotiations.

Caltrans, in coordination with Stanislaus County, and the Cities of Modesto, Riverbank, and Oakdale, shall implement all property acquisition and relocation activities in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) of 1970 (Public Law 91-646, 84 Stat. 1894). The Uniform Act mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced by the project. The Uniform Act provides uniform and equitable treatment by federal or federally assisted programs of persons displaced from their homes, businesses, or farms, and establishes uniform and equitable land acquisition policies. See Appendix E in Volume 2 for more information on the Caltrans Relocation Assistance Program. Also, Mitigation Measure RLC-1 (Section 3.1.4.2) includes measures that may be considered by Caltrans for incorporation into the relocation plan to minimize impacts to displaced businesses and residences. Accordingly, acquisitions would be conducted as necessary to build the approved project, and displaced businesses would be provided just compensation in accordance with the Uniform Act.

Comment 59
Comment from Burtschi, Alfred H.



Caltrans

North County Corridor

Name (Please print): Alfred H Burtschi Date: 9/7/17

Mailing address: 9113 Alvarado Rd Oakdale Ca

Phone: 209-869-2661 Email:

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

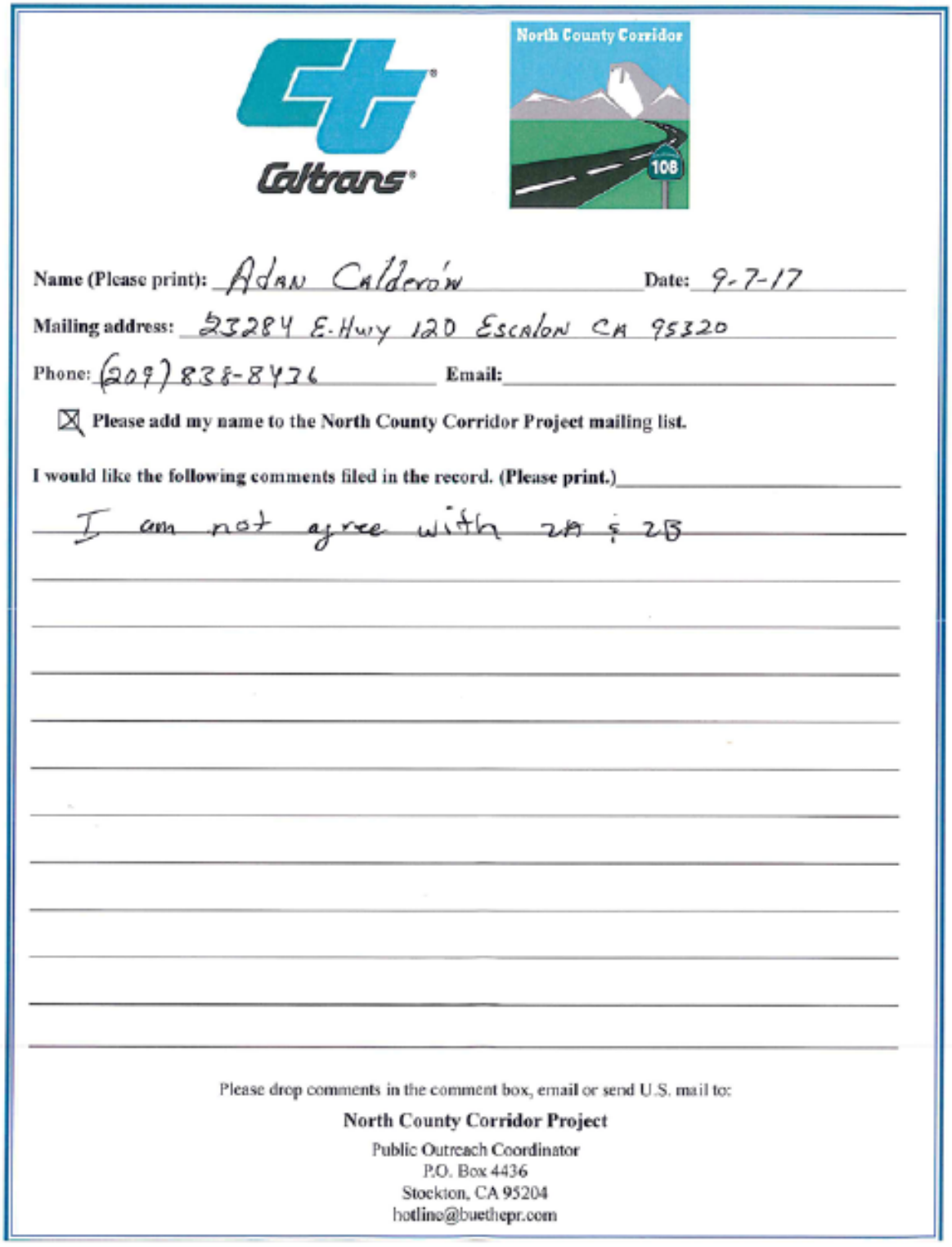
Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 59 to Alfred H. Burtschi: Thank you for your comments; they have been included in the Final Environmental Document. Your name will be added to the project mailing list.

Comment 60
Comment from Calderon, Adan



Caltrans

North County Corridor

Name (Please print): Adan Calderón Date: 9-7-17

Mailing address: 23284 E. Hwy 120 Escalon CA 95320

Phone: (209) 838-8476 Email:

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

I am not agree with 2A & 2B

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 60 to Adan Calderon: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 61
Comment from Camillo, Carrie and Ramon

Caltrans

North County Corridor

Name (Please print): Ramon & Carrie Camillo Date: 9/7/17

Mailing address: 524 So. Stearns Road Oakdale 95361

Phone: 209-848-5549 Email: CarrieLCamillo@yahoo.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

We believe the Best Route would be 1B or 2B
would be Best if traffic goes to Lancaster

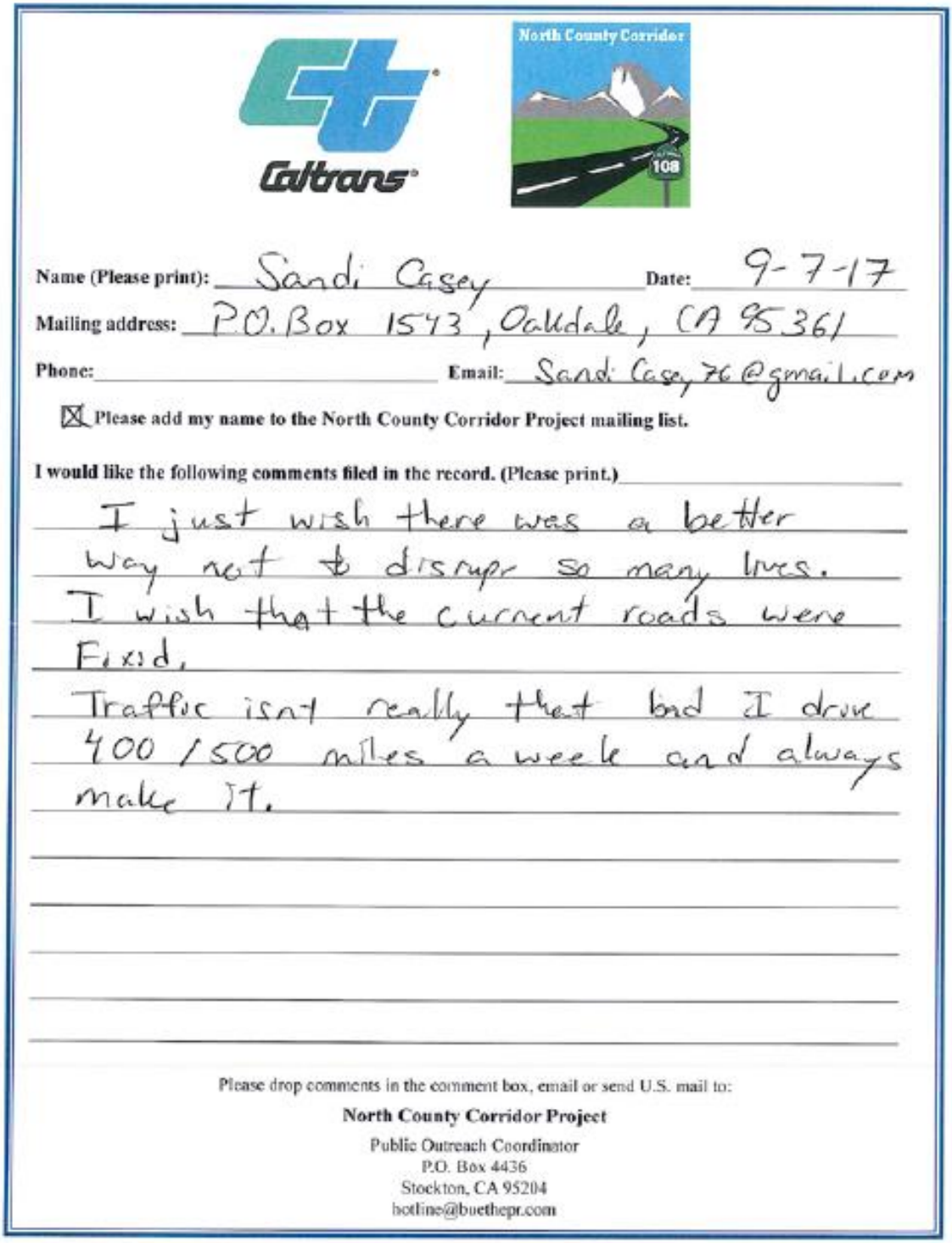
We are in 1A - 2A and this will be a great Heartship

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 61 to Carrie and Ramon Camillo: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 62
Comment from Casey, Sandi



Caltrans

North County Corridor

Name (Please print): Sandi Casey Date: 9-7-17

Mailing address: P.O. Box 1543, Oakdale, CA 95361

Phone: Email: Sandi.Casey.76@gmail.com

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

I just wish there was a better way not to disrupt so many lives. I wish that the current roads were fixed. Traffic isn't really that bad I drive 400/500 miles a week and always make it.

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

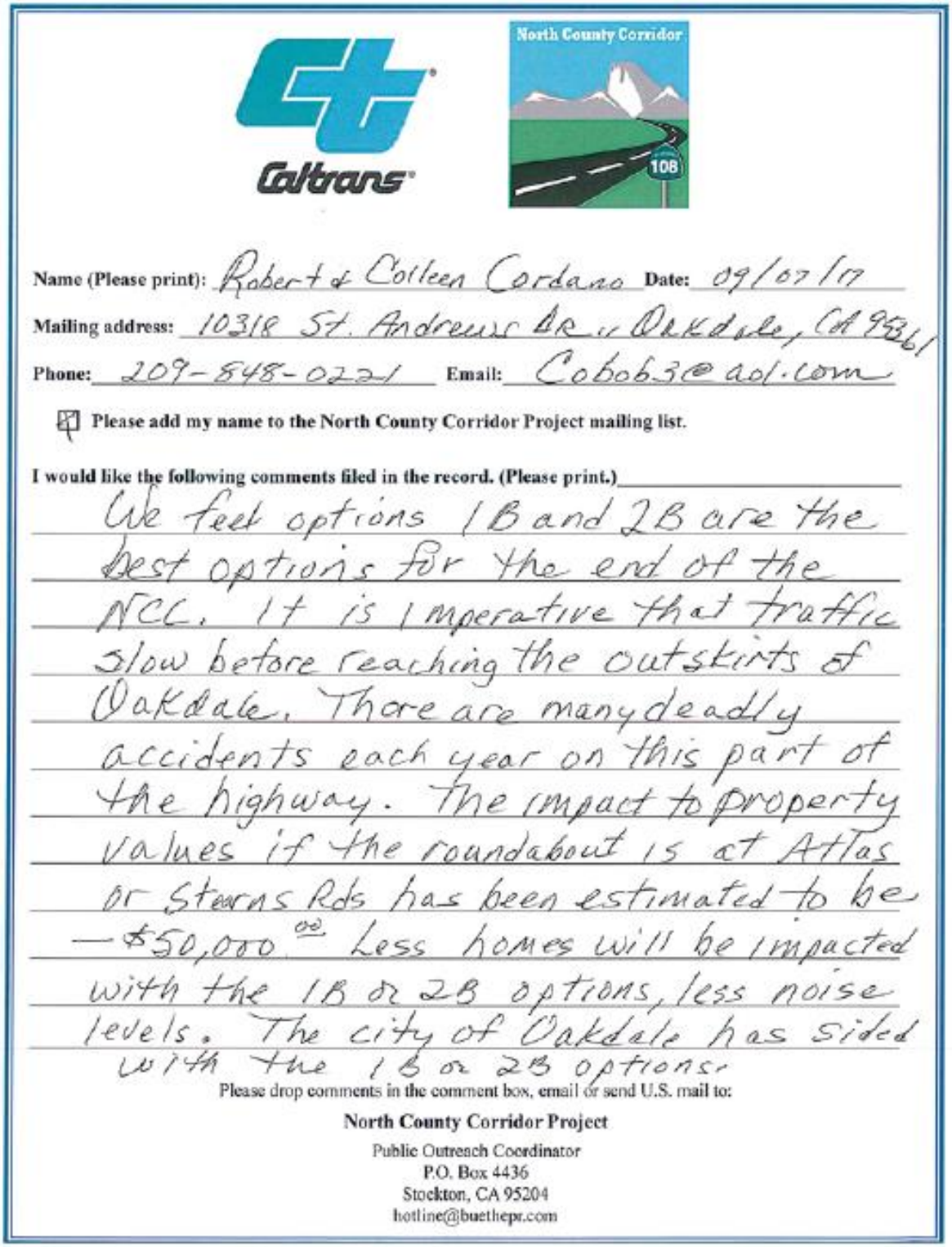
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 62 to Sandi Casey: Thank you for your comments; they have been included in the Final Environmental Document.

The *Final Traffic Operations Report for the North County Corridor* (2015) study for the project, and information provided in Section 3.1.6 of the NCC Final EIR/EIS – Traffic and Transportation/Pedestrian and Bicycle concluded that traffic redistribution as a result of any of the alternatives (1A, 2A, 1B, and 2B) would improve the level of service throughout the region.

Fixing existing roads does not meet the purpose and need of the project; however, the current design of the project meets the purpose of the project, which is to reduce average daily traffic volumes and current traffic congestion and accommodate anticipated future traffic on the existing SR-108 and the surrounding regional transportation network in Stanislaus County and the cities of Modesto, Riverbank, and Oakdale. Further information regarding the purpose and need of the project can be found in Section 1.2 of the NCC Final EIR/EIS.

Comment 63
Comment from Cordano, Robert and Colleen



Caltrans

North County Corridor

Name (Please print): Robert & Colleen Cordano Date: 09/07/17

Mailing address: 10318 St. Andrews Dr. Oakdale, CA 95361

Phone: 209-848-0221 Email: Cobob3@aol.com

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

We feel options 1B and 2B are the best options for the end of the NCC. It is imperative that traffic slow before reaching the outskirts of Oakdale. There are many deadly accidents each year on this part of the highway. The impact to property values if the roundabout is at Atlas or Stearns Rds has been estimated to be ~$50,000.00 Less homes will be impacted with the 1B or 2B options, less noise levels. The city of Oakdale has sided with the 1B or 2B options.

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 63 to Robert and Colleen Cordano: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 64
Comment from Connolly, Richard and Jill K.

Caltrans

North County Corridor

RECEIVED
SEP 12 2017
BY:

Name (Please print): Jill K Connolly **Date:** 9-20-2017

Mailing address: 6731 Stoddard Rd. Oakdale, CA. 95361

Phone: 209-605-0487 **Email:** jillcnnlly@yahoo.com

☒ **Please add my name to the North County Corridor Project mailing list.**

I would like the following comments filed in the record. (Please print.) I Am in agreement with the city council of Oakdale in selecting 1B as the preferred route of the corridor - When moving on a project this large, it seems the least disruption to the people, at a lower cost to taxpayers is the right decision

THANK You

Jill K Connolly
Richard Connolly
6731 Stoddard Rd
Oakdale, CA. 95361

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 64 Richard and Jill K. Connolly: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 65
Comment from Corey, Peggy and Brad

Caltrans

North County Corridor

Name (Please print): Brad + Peggy Corey Date: October 15, 2017

Mailing address: 925 Townhill Ave, Oakdale, CA 95361

Phone: (209) 847-2340 Email: peki@sbcglobal.net.

☒ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) Our names are Brad and Peggy Corey and we are the residents of 925 Townhill Ave in Oakdale. We lived in the Bay Area for a large portion of our lives, but once we saw that the area was expanding drastically we desired to live in a place that had strong sense of community and tradition where our family could grow. We fell in love with the city of Oakdale in 1987 and have been proud residents for over 30 years now. We bought our home on Townhill Ave and have landscaped, remodeled, and added onto the property as an investment into our family with a dream of retiring here. Our daughter and her husband built a house across the street and have raised their children there. We have watched our granddaughters grow up in this beautiful community and on our land where all of our most cherished memories are. But with the proposal for the SR 108 - North County Corridor plans 1A or 2A, that would make this dream of our retirement impossible. We own our own →

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buehlepr.com

business that we run from our home and losing our land and our home would devaste our business and family. With the upcoming decision for the County Corridor, we please urge you to not pick routes 1A or 2A as that would leave us without our home.
Thank You for taking the time to read this!

Response 65 to Peggy and Brad Corey: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.

Comment 66
Comment from Corwin, R.J.

Caltrans

North County Corridor

Name (Please print): RJ Corwin Date: 9/7/2017

Mailing address: 10510 Gibbs Drive Oakdale

Phone: 209 605 1528 Email: FCRJBike@gmail.com

☐ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.) I like the Roundabout on 108/120 – Much Safer Any Plans to Include Bicycle Lanes on the North county Corridor would Be Great

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project

Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 66 to R.J. Corwin: Thank you for your comments; they have been included in the Final Environmental Document.

The proposed project could accommodate a Class III bike route in each direction on roadway shoulders from Claus Road to the eastern terminus at SR 108/SR 120. Local roads could accommodate Class II bicycle facilities. Bicycle facilities will not be precluded from being considered, and incorporation of the bike routes would enhance the existing bikeway network in Stanislaus County and is consistent with the Non-Motorized Transportation Master Plan (StanCOG, 2013).

Comment 67
Comment from DeMelo, Vic

Caltrans

North County Corridor

Name (Please print): Vic deMelo Date: 9/7/11

Mailing address: 1556 Parkside Drive, Walnut Creek, CA 94596

Phone: (925) 808-2225 Email: VDEMELO@BROADMANDEVELOPMENT.com

☑ Please add my name to the North County Corridor Project mailing list.

I would like the following comments filed in the record. (Please print.)

As Owners of the Crossroads Industrial Riverbank Center, We Would like to See Claribel Road Further Widened (6 lanes) vs. the substantial investment in multiple overpasses at Coffee, Orange and Roselle.

V. DeMelo

Please drop comments in the comment box, email or send U.S. mail to:

North County Corridor Project
Public Outreach Coordinator
P.O. Box 4436
Stockton, CA 95204
hotline@buethepr.com

Response 67 to Vic DeMelo: Thank you for your comments; they have been included in the Final Environmental Document.

A widening of State Route 219 (Claribel Road) would not have met the project purpose and need and was not considered as a feasible project alternative. Ultimately, the four chosen alternatives were found to best meet the purpose and need of the NCC project, and all four serve to simplify traffic exposure from west to east. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Please refer to Section 2.5 of the NCC Final EIR/EIS for more information regarding all alternatives explored.

Comment 68
Comment from Denison, Benjamin and Helga

From: helga denison [mailto:dehelga@yahoo.com]
Sent: Monday, September 25, 2017 5:50 PM
To: Vallejo, Philip@DOT <philip.vallejo@dot.ca.gov>
Subject: North County Corridor in Oakdale, Ca

Gentlemen, since both my husband and I are disabled to come to any meetings, we want to write to you and let you know where we stand on the by pass. We may not even live long enough to be around once you get to the point of building it. But the plan 1B seems to be the very best option. It leaves most houses standing and away from newer construction. It takes more empty land and Con Agra should approve this option also. 1B is not intruding on homes as much as 1A. We are only concerned with the direction when it comes to Oakdale, Ca. Thank you
resident of Oakdale, Ca

Benjamin and Helga Denison

have a nice day, B and H

Response 68 to Benjamin and Helga Denison: Thank you for your comments; they have been included in the Final Environmental Document. The North County Corridor Project Development Team has recommended Alternative 1B as the Preferred Alternative. Alternative 1B was selected by the NCC Project Development Team as provided in Section 2.5 of the NCC Final EIR/EIS.