

October 16, 2025

MEMO TO: Stanislaus County Planning Commission

FROM: Department of Planning and Community Development

**SUBJECT: GENERAL PLAN AMENDMENT APPLICATION NO. PLN2025-0070 –
HIGHWAY COMMERCIAL PLANNED DEVELOPMENT**

RECOMMENDATION

Based on the discussion below and on the whole of the record provided, staff is requesting that the Planning Commission provide a recommendation of approval of General Plan Amendment Application No. PLN2025-0070 – *Highway Commercial Planned Development* to the Board of Supervisors. If the Planning Commission decides to provide a recommendation of approval, Exhibit A provides an overview of all of the findings required for project approval.

The amendments being recommended for approval are reflected in Exhibit C – *Draft Amended Highway Commercial Planned Development Land Use Designation*, which shows all proposed text additions in bold and underlined font and all proposed text deletions are in strikethrough font.

BACKGROUND

Exhibit B of this report provides a detailed background of truck parking in the General Agriculture District (A-2) and the issues that have led to this request.

PROJECT DESCRIPTION

This project is a request to amend the text of the Highway Commercial Planned Development (HCPD) land use designation in the Land Use Element of the Stanislaus County General Plan to establish policies addressing the development or establishment of large-scale truck parking facilities in the unincorporated areas of Stanislaus County. Specifically, these amendments address requirements for parking of tractor-trailer combinations including tractors, truck/trailers, and truck/tankers with a minimum of five (5) axles, capable of hauling a combined gross vehicle weight of 80,000 pounds (hereafter referred to as “trucks”), as illustrated by the following:





Presently, the HCPD designation is described as appropriate for land located at freeway interchanges, for uses serving highway travelers. Truck parking, as part of a truck stop, is considered an allowed use under the HCPD designation. This request is to amend the General Plan text for the HCPD land use designation to call out truck parking as a standalone use, broaden applicability for the HCPD designation to property within a half-mile of a state highway or interstate when that property is solely used to develop truck parking as a principle use, and set criteria to address land use compatibility and environmental concerns, and limit intensity and concentration of development.

Concurrent with consideration of this request is Ordinance Amendment Application No. PLN2025-0069 – *Truck Parking*. The Planning Commission and Board of Supervisors will consider amendments to Chapters 21.20 *General Agriculture District (A-2)* and 21.94 *Home Occupations* of the Stanislaus County Zoning Ordinance, and adoption of a new Chapter 21.89 *Truck Parking Facilities*, to update regulations applicable to parking of trucks in the A-2 zoning district allowed under a use permit or as a home occupation.

The proposed amendments to the HCPD designation would apply to truck parking development requests that require either a General Plan amendment or rezone, including requests that exceed the criteria for truck parking facilities allowed use permit or home occupation in the A-2 district, as required by the existing Zoning Ordinance and any amendments under PLN2025-0069, if adopted. Truck parking facilities that would require a General Plan amendment and/or rezone would typically be larger-scale truck parking facilities on A-2 zoned land that propose parking of more than the 12 tractor-trailer combinations and 24 trailers or which provide a greater breadth of activities than allowed under a use permit, including ancillary on-site repair or maintenance. Another applicable type of project would include projects which propose to rezone from an existing Planned Development (P-D) zoning which does not include truck parking as a permitted use, to allow for truck parking as a principle use.

The proposed HCPD amendments have been developed through a development process, with input from an ad hoc committee formed to evaluate truck parking issues, as discussed in the *Background* Section of this report. The proposed amendments to the HCPD designation is intended to establish the HCPD designation as the most appropriate land use element designation for parcels which are not already appropriately zoned for large-scale truck parking (i.e. sites zoned other than General Commercial (C-2), Highway Frontage (H-1), or Industrial (M)) and which need to be rezoned in order to allow the use. The amendments also propose to set a policy of directing larger-scale truck parking facilities to be sited within a half-mile of major transportation corridors, close to state routes and interstates that typically accommodate and serve as the primary transportation routes for truck travel, thereby limiting these facilities' intrusion further into agricultural areas of the County.

The amendments also propose to establish the following criteria for the development of larger-scale truck parking facilities to address land use compatibility and environmental

concerns, and which aim to limit intensity and concentration of the development (see Exhibit C – *Draft Amended Highway Commercial Planned Development Land Use Designation*):

1. The use may not establish a concentration of more than two truck parking facilities within a one-mile radius of any property as further defined in proposed Chapter 21.89 of the Zoning Ordinance, which is being recommended for consideration under PLN2025-0069 – *Truck Parking*;
2. The parcel subject to the HCPD designation is not in a Williamson Act Contract and less than 10 gross acres in size;
3. The number of tractor-trailer combinations parked on-site does not exceed 80 trucks and 160 trailers;
4. Permanent, fixed restrooms are provided for drivers and employees;
5. The roads used to access the facility meet all county, city and state access requirements;
6. High quality landscaping, screening treatments, and parking surface materials are incorporated into the design of the project.

The amendments also propose to preclude any site approved for large-scale truck parking under this amended HCPD designation from developing with other commercial activities or uses unless located directly adjoining an interchange. Being that the proposed amendments expand the parcels which may be appropriate for the HCPD designation when developed for truck parking as a principle use, from parcels at interchanges to any property within a half-mile of specified state routes and interchanges, this limitation intends to mitigate the potential for parcels not directly contiguous with the state routes and interstates from developing with more intense commercial development.

If these amendments are approved, there still remains an option for applicants to apply for rezones to Planned Development under a different General Plan designation, for requests to locate further than a half-mile from the state routes or interstates; however, with these amendments setting a direction of establishing appropriate locations and development limitations for truck parking facilities, staff would be unlikely to recommend approval in those instances.

CORRESPONDENCE

In response to the Early Consultation referrals circulated for both this project and Ordinance Amendment Application No. PLN2025-0069, correspondence was received from multiple agencies and a member of the trucking industry (see Exhibit D – *Early Consultation Referral Responses*). The following is a summary of the responses received:

1. The Stanislaus County Department of Environmental Resources (DER) Groundwater Division, West Stanislaus Fire Protection District, and Hills Ferry Cemetery District responded with no comments.
2. The Stanislaus County DER Hazardous Materials Division (Hazmat) requested that the proposed ordinance amendments under PLN2025-0069 enumerate that no lead acid battery replacements may occur. Under the proposed General Plan amendment, ancillary repair and maintenance activities may be requested, in which case Hazmat's regulatory requirements for storage and reporting of hazardous materials will be required.
3. The California Department of Transportation (Caltrans) responded stating that projects along state highways require review by Caltrans to verify Surface Transportation Assistance Act (STAA) requirements are met, for sight distance and safety issues.
4. The City of Modesto responded with general comments pertaining to the updated allowance and concerns about how the proposed amendments will impact land use compatibility and community character within the City's Local Agency Formation Commission (LAFCO) adopted Sphere of Influence (SOI). They emphasized their opposition to any truck parking development within the City's SOI unless the property's designation is Industrial due to concerns over noise, air quality, and traffic impacting commercially or residentially-designated areas. To support a truck parking development project on industrially-designated land in the City's General Plan Land Use Element, the City also indicated they would only support a development under a rezone application subject to all applicable City standards. A discussion on the County's General Plan Land Use Element policies regulating the development of land in a LAFCO adopted SOI of a city or special district is provided in the General Plan Consistency Section of this memo.
5. The Central Valley Regional Water Quality Control Board (CVRWQCB) requested that CVRWQCB permits that may be required for truck parking applications be included in the record, including Construction Storm Water General Permit, Clean Water Act Section 404 Permit including Water Quality Certification, Waste Discharge Requirements, Dewatering Permit, Limited Threat General NPDES Permit, and NPDES Permit.
6. Turlock Irrigation District (TID) responded with general comments pertaining to the updated allowances and criteria proposed for the Zoning Ordinance and General Plan text amendments. TID requested that any development projects located in their service boundaries continue to be referred to TID to determine project-specific improvements and appropriate mitigation for impacted TID irrigation facilities. Any discretionary application for a land use entitlement to conduct truck parking on property within TID's service boundary or with a potential to impact TID facilities will continue to be referred to TID to request feedback on the project's potential impacts to services and conditions of approval as part of standard practice.

7. Hetch Hetchy Regional Water and Power responded specifying that truck parking projects operated under a home occupation or use permit would not be compatible with the San Francisco Public Utility Commission right-of-way and specified that any project proposing crossing, use of, rezoning, or work on City and County of San Francisco property must be reviewed prior to consideration by the Planning Commission.
8. Applicant, Ranjit Pattar, of Use Permit Application No. PLN2025-0013 – Pattar Trans, Inc. responded stating that impacts from truck parking facilities will not be significant based on traffic volume not increasing beyond what is typical for agricultural or truck operations, air emissions being reduced by eliminating trips to different off-site parking locations, operations generally occurring during normal business hours and therefore no nighttime noise disturbance, and no further grading needing to occur beyond that already done for existing truck parking operations, with permeable or stabilized surfaces used to minimize runoff and erosion. He further stated that impacts to these areas could be addressed through requirements for proper signage and clear driveways, posting and enforcement of no-idling signage, restricting routine truck movement to standard daytime hours, and implementing dust control measures. He also stated that he strongly supports the County's efforts to create clear, fair rules for truck parking, but requested flexibility for fencing and setback requirements to prevent costly unnecessary upgrades when sites are already safe and secure, streamlined renewal process for five-year permits to ensure trucking businesses can continue without delay, and reasonable and predictable annual inspections, coordinated in advance to prevent operational disruptions.

GENERAL PLAN CONSISTENCY

The General Plan is a comprehensive, long-term plan for the physical development of the County. The General Plan consists of a statement of development policies, standards, and plan proposals. All General Plan amendments, zoning ordinance amendments, and development proposals must be found to be consistent with the general plan in order to be approved.

The HCPD designation is described as appropriate for uses serving highway travelers on land located at freeway interchanges, for uses serving highway travelers. Truck parking, as part of a truck stop, is considered an allowed use under the HCPD designation. This request is to amend the General Plan text for the HCPD land use designation to call out truck parking as a standalone use, broaden applicability for the HCPD designation to property within a half-mile of a state highway or interstate when that property is solely used to develop truck parking as a principle use, and set criteria to address land use compatibility and environmental concerns, and limit intensity and concentration of development.

Policy Twenty-Six and Twenty-Seven of the Land Use Element of the Stanislaus County General Plan requires city support of projects located within a city sphere of influence (SOI) and consultation with cities when a project is located within one mile of a city SOI and within the city's General Plan area. The proposed General Plan amendment was referred to all nine cities within the County. As mentioned in the *Correspondence*

section of this memo, the City of Modesto responded with concerns about truck parking projects located within their SOI, and to obtain support for any truck parking request in the City's SOI, it would need to be located on industrially-designated land in the City's General Plan Land Use Element. The City also indicated they would only support a development under a rezone application to a Planned Development (P-D) zone subject to all applicable City standards. Whether or not the proposed General Plan text amendments are approved, any project request in a city's SOI would be referred to the city and unable to be considered by the County Planning Commission or Board of Supervisors unless written approval is obtained and all applicable development standards applied.

Goal Two of the Land Use Element requires the County to "Ensure compatibility between uses". The proposed amendments include new requirements for high-quality landscaping and screening treatments intended to minimize conflicts between truck parking uses and adjacent agriculture and residents.

Goal Three, Policy Nineteen of the Land Use Element is "Accommodate the siting of industries with unique requirements". The County recognizes the state-wide shortage of available truck parking facilities, and the limited quantity of land adjacent to highway corridors. To support the logistics industry while recognizing the safety and environmental issues that result when there is insufficient supply of parking facilities, the County proposes to maintain the allowance for large-scale truck parking facilities to develop within a half-mile of a highway corridor, while adding requirements to quantify and restrict a concentration of these uses from developing, and proposes that facilities must incorporate aesthetic and operational design considerations to minimize conflicts between these sites and adjacent agriculture and residents. This also furthers the Agricultural Element's Goal One, Policy 1.7 which states:

"Concentrations of commercial and industrial uses, even if related to surrounding agricultural activities, are detrimental to the primary use of the land for agriculture and shall not be allowed."

To minimize conflicts between agriculture operations and non-agricultural operations, Buffer and Setback Guidelines (Appendix A of the Agricultural Element) have been adopted. The purpose of these guidelines is to protect the long-term health of local agriculture by minimizing conflicts resulting from normal agricultural practices as a consequence of new or expanding uses approved in or adjacent to the A-2 (General Agriculture) zoning district. Appendix A of these guidelines states that all projects shall incorporate 6-foot-tall fencing and a minimum 150-foot-wide buffer setback, or a 300-foot-wide buffer setback for people intensive outdoor activities, such as athletic fields; parking lots are a permitted use within the buffer area. Parking is a permitted use within the agricultural buffer. Ancillary office space and repair facilities that may be requested with a truck parking facility are subject to the 150-foot-wide buffer. All projects requesting a use permit will be subject to these setback and buffer requirements. As part of the new proposed requirements, all projects will need to demonstrate compliance with the setback requirements.

Policy 2.3 of Goal Two of the Agricultural Element requires that "the County shall ensure all lands enrolled in the Williamson Act are devoted to agricultural and compatible uses

supportive of the long-term conservation of agricultural land.” The proposed amendments include a new requirement that no land which is enrolled in a Williamson Act Contract and require cancellation for the use may qualify for a truck parking facility, to preclude the possibility of degradation of contracted agricultural land and remove concerns related to reverting graveled or paved truck parking areas back to agricultural in the event the use discontinues on a property. Further, Policy 2.10 of Goal Two of the Agricultural Element states that the County’s Agricultural land use designation and corresponding A-2 (General Agriculture) zoning recognize ranchette areas with minimum lot size requirements of 3, 5, 10, and 20 acres. Ranchette areas have been identified based on significant existing parcelization of property, poor soil, location, and other factors which limit the agricultural productivity of the area. Furthermore, 10 acres is identified in state law and the County General Plan and Williamson Act Uniform Rules as the minimum possible acreage for enrollment in a Williamson Act Contract. Accordingly, the amendments propose to establish a maximum parcel size of 10 gross acres to qualify to apply for a use permit to conduct truck parking. This maximum parcel size limit will direct truck parking to only possibly convert ranchette parcels and preclude productive agricultural parcels which are eligible for enrollment into a Williamson Act Contract from qualifying.

There are other General Plan goals and policies that may apply directly and indirectly to projects that would result from this General Plan amendment. These goals and policies are related to agricultural conversion, traffic, public services, safety, hazards, water quality, and other items that will be reviewed with each project. The proposed General Plan amendments require that each proposed parking facility go through a general plan amendment and/or rezone process which includes CEQA review. Each project will be reviewed by the responsible agencies for comments, conditions, and mitigation if required.

Staff believes the proposed amendment to the HCPD designation are consistent with goals, policies, and implementation measures of the General Plan that have been designed to improve the overall economic, physical, and social well-being of the County as a whole. Furthermore, staff believes that none of the proposed modifications will negatively affect the ability of public agencies, within the County, to maintain current levels of service.

ZONING ORDINANCE CONSISTENCY

A jurisdiction’s Zoning Ordinance must be consistent with its general plan. The appropriate zones for the HCPD designation are Planned Development (P-D) or A-2 until rezoned to P-D. The P-D zoning provides a flexibility in establishing development standards unique to each request. In this case, the amended language will guide required development standards necessary to adhere to the General Plan requirements discussed in the *Project Description* section of this report.

ENVIRONMENTAL REVIEW

This project has been determined to be generally exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) of the California Code of Regulations. A CEQA Exempt Referral and Notice of Public Hearing was

circulated to all interested parties and responsible agencies for review and comment (see Exhibit F- *Environmental Review Referrals*). A Notice of Exemption has been prepared for approval as the project will not have a significant effect on the environment (see Exhibit E – *Notice of Exemption*). There are no conditions of approval for this project.

Contact Person: Kristen Anaya, Senior Planner, (209) 525-6330

Attachments:

- Exhibit A - Findings and Actions Required for Project Approval
- Exhibit B - Background of Truck Parking in the General Agricultural District (A-2)
- Exhibit C - Draft Amended Highway Commercial Planned Development Land Use Designation
- Exhibit D - Early Consultation Referral Responses
- Exhibit E - Notice of Exemption
- Exhibit F - Environmental Review Referrals

Findings and Actions Required for Project Approval

The Planning Commission recommends that the Board of Supervisors:

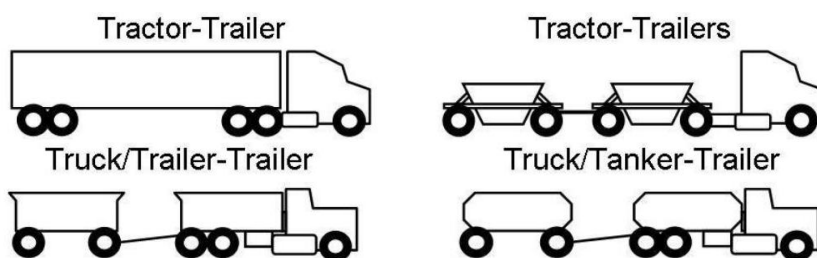
1. Find that there is no substantial evidence the project will have a significant effect on the environment and that the project is generally exempt for the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061 and Section 15282(h).
2. Find that the Exemption reflects Stanislaus County's independent judgement and analysis and order the filing of a Notice of Exemption with the Stanislaus County Clerk-Recorder pursuant to CEQA Guidelines Section 15062.
3. Find the project is consistent with the overall goals and policies of the Stanislaus County General Plan.
4. Approve General Plan Amendment Application No. PLN2025-0070 – *Highway Commercial Planned Development*.

Background of Truck Parking in the General Agriculture District (A-2)

This section provides an overview of the initial creation of allowances for truck parking in the A-2 district, issues surrounding truck parking in the unincorporated agricultural areas of Stanislaus County since the current ordinances' adoption, and the 2025 formation of an ad hoc committee and ordinance and General Plan amendment development process.

History of Truck Parking in the A-2 District and 2012 Ordinance Adoption

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



Prior to the ordinance amendments' adoption in 2012, truck parking in the A-2 zoning district was limited to trucks that were accessory and incidental to permitted agricultural operations, uses that are closely related to agriculture permitted by a Tier One use permit such as a huller-sheller, or as part of an agriculturally-related business permitted by a Tier Two use permit, such as an agricultural service establishment (meaning "a business engaging in activities designed to aid production agriculture"), or an agricultural processing facility. Accordingly, prior to the 2012 ordinance amendment the only pathway for permitting general freight trucking businesses in the A-2 zoning district was through a general plan amendment and/or rezoning process.

The process to initiate the 2012 ordinance amendment began in response to an increase in Code Enforcement (CE) cases, which intensified in 2008 when roughly 20 truck parking facilities were reported to the Stanislaus County Department of Environmental Resources (DER) CE Division, and each were given a notice and order to abate. Following these CE efforts, a number of truck operators formed an informal group in order to bring the issues associated with the commercial truck parking before the County. Throughout the ordinance amendment process, residents, landowners, truck drivers, businesses, and County officials provided a variety of feedback on the issue, related to concerns and benefits of truck parking in the A-2 zoning district, which shaped the amendment that was ultimately adopted by the Board of Supervisors. The resulting amendments allowed for truck parking in the A-2 zoning district via two permitting pathways:

1. Option one, established Zoning Ordinance Section 21.94.020(J)(4), which allows a maximum of three tractors and three trailers to be parked on any single parcel at least one acre in size, provided all trucks are registered to the occupant, and a home occupation business license is issued by staff to an occupant of a dwelling on an A-2 zoned parcel.
2. Option two, established by Zoning Ordinance Section 21.20.030(G), allows the parking of up to 12 tractors and 24 trailers, provided a use permit is granted by the Planning

Commission, subject to limitations that include the property owner being required to live on-site, size minimums and maximums for the operation and any office accessory to the operation, on-site improvements, and limits to how the truck parking facility can operate. Additionally, for truck parking requests via a use permit, the Planning Commission must find, in addition to the general finding required for approval of any use permit, that, "The establishment [of the use] as proposed will not create a concentration of commercial and industrial uses in the vicinity".

For the parking of more than 12 tractors and 24 trailers in the A-2 zoning district, the only land use entitlement option remains a general plan amendment and/or rezone, which may be difficult to approve.

Since adoption of the ordinance amendment in 2012, the Stanislaus County Planning Department has received 27 use permit applications for truck parking in the A-2 zoning district, and five applications to amend the general plan and/or zoning designations of agricultural land to Planned Development for larger-scale facilities exceeding 12 trucks and 24 trailers. The following is the status of those 32 applications that have been received since the 2012 Ordinance Amendment:

- Nine use permit applications have been approved by the Planning Commission;
- One use permit application has been denied by the Planning Commission;
- Two General Plan amendment and Rezone applications, Nos. PLN2024-0016 – *Atwal Properties* and PLN2021-0052 – *Pattar Trucking*, have been approved by the Board of Supervisors, on August 19, 2025;
- Fifteen applications, consisting of thirteen use permit applications and two General Plan amendment and/or Rezone applications, have been withdrawn prior to public hearing due to either the inability to meet the established criteria in the case of use permits, or due to costs associated with developing the facilities in accordance with County standards; and
- Five applications (four use permit applications and one rezone application) are in process.

Of the above 32 applications, 23 applications were submitted after 2021. In recent years, the County has seen a steady rise in complaints related to unpermitted truck parking uses in the A-2 zoning district. Between 2014 and 2020, the County received a relatively consistent number of complaints and associated CE cases annually, with an annual average of six complaints received and three CE cases opened after verifying noncompliance. While the number of complaints and opened CE cases have gradually increased since 2016, 2021 marks a steep increase of documented truck parking facilities established without use permits or home occupation business licenses, or for facilities exceeding allowances of the home occupation allowances. From 2022 to 2024, the number of complaints averaged 16, with an average of 10 cases opened for verified noncompliance, per year in this three-year period. Of the 32 total applications received since 2012, 25 were submitted to legalize truck parking facilities which were subject to CE cases resulting from complaints received. In recent years, community complaints to CE and planning staff have touched on the following concerns:

- Increased truck traffic on substandard rural roads leading to worsened road conditions;
- Safety issues surrounding speeding and rural roadways being unsuitable to accommodate the required turning movements of tractor-trailers;
- Noise and air quality concerns from idling tractor-trailers;

- Concerns about soil and water impacts resulting from spills of hazardous materials stored on-site, such as engine oil and coolant;
- Conversion of farmland to trucking uses;
- Concerns over inflated agricultural real estate prices resulting from truck operators buying and operating illegal truck parking facilities on agricultural land in lieu of commercial- or industrial-zoned land;
- Aesthetic concerns resulting from sites being poorly maintained and allowing debris and junk to be stored and accumulate on-site;
- Additional on-site activities occurring in conjunction with the truck parking facility, that would not be permitted under the use permit allowances, such as truck repair, truck driving schools, etc; and
- An over-concentration of truck parking facilities, both permitted and unpermitted, in the south Ceres, Keyes, and south Turlock areas impacting the rural character of those areas.

As noted above, the A-2 district's allowance for truck parking facilities to develop with a use permit is, in part, contingent on a finding being made that "the establishment as proposed will not create a concentration of commercial and industrial uses in the vicinity". While staff has interpreted this finding to specifically apply to the concentration of trucking-related uses in a project's vicinity, the County's Zoning Ordinance does not quantify or define what a "concentration" is with respect to the number of facilities within a specific distance.

In response to the increase in CE cases resulting from complaints about truck parking facilities, the Board of Supervisors, at the request of the District Two Supervisor Vito Chiesa, directed staff at the August 20, 2024, Board of Supervisors meeting, to bring the issue of unpermitted truck parking to the General Plan Update Committee (GPUC) meeting to evaluate next steps. Following a staff presentation of the history of the truck parking ordinance and recent CE data related to the use, the GPUC, at the December 5, 2024 meeting, directed staff to seek formation of an AHC consisting of members of the Board of Supervisors and Planning Commission.

Formation of a 2025 Ad Hoc Committee

On January 16, 2025, the Planning Director formed the AHC, comprised of District Two Supervisor Vito Chiesa and Planning Commission Chair Carmen Morad. The AHC, supported by staff from various County departments, has spent the last several months researching, conducting public outreach, and developing land use policy recommendations for how to address the truck parking in the A-2 zoning district, including large scale facilities, with a focus on minimizing conditions that result in community complaints over the use. Focused meetings with stakeholder groups (members of the trucking industry, concerned agricultural residents, and realtors) were conducted during this process to assess needs, concerns, priority issues for both truckers and the agricultural community. Draft ordinance amendments were presented at a community meeting on July 23, 2025. Input from these meetings included the concerns above, and the following new concerns:

- Limited availability and cost of commercial and industrial-zoned land upon which truck parking can be developed;
- Truckers feeling misled by realtors on the probability and ease that agricultural land may be entitled to truck parking; and
- Concerns over the lack of CE action to address unpermitted facilities, and concerns that existing enforcement fines do not sufficiently dissuade new truck parking facilities from

developing on agricultural land due to costs recovered by trucking facilities through leasing of parking spaces.

In addition to focused meetings with stakeholder groups, planning staff met with County departments, and outside agencies to identify issues with truck parking as it relates to each groups area of expertise or experience. Other efforts have included reviewing adjacent jurisdictions' ordinances addressing truck parking (San Joaquin and Merced Counties) and a tour by vehicle of existing truck parking sites in the County. These data collection efforts identified that there is a variety of unique issues stemming from the development and operation of truck parking facilities that existing codes and regulations do not thoroughly address. Specifically, the following issues have been raised by County departments:

- Difficulties in attaining compliance with registration and handling requirements for hazardous materials, such as engine oil used for oil changes;
- Safety concerns regarding the hazardous materials stored on-site combined with the proximity of parking stalls to adjacent structures posing a fire risk;
- Concerns about project feasibility from the Department of Public Works due to the costs associated with designating local roadways as Terminal Access routes for Surface Transportation Assistance Act (STAA) vehicles;
- Issues with assessing and collecting fines for noncompliant properties; and
- No means to collect impact fees that off-set road impacts, due to frequent scenarios where truck parking facility requests propose to develop with no buildings.

Additionally, the AHC identified a need for: more prescriptive aesthetic requirements for site maintenance, screening, and landscaping; more specific site criteria and limitations on where truck parking facilities may develop in the County; and to further define what a concentration means for facilities permitted by use permit. Accordingly, the AHC determined that there is both a need to update existing allowances to conduct truck parking in the A-2 zoning district and more dedicated enforcement of non-compliant properties to address the proliferation of properties with unpermitted truck parking facilities.

2025 Ordinance Amendment Development Process

Based on the feedback received and at the direction of the AHC, staff drafted amendments to the County's General Plan and Zoning Ordinance to incorporate new requirements for truck parking development projects, to address the major issues and concerns that were identified through the outreach and data collection process. These included draft Zoning Ordinance amendments that refine the existing allowances for truck parking facilities to operate under a use permit or home occupation business license, and draft General Plan text amendments which address requirements and policies for development of larger scale truck parking facilities which propose the parking more than the use permit-allowed maximum of 12 trucks and 24 trailers.

Due to statewide shortages of truck parking locations in California, and market trends reflecting an increasing demand for facilities which support the shipping and logistics industry, the allowance for the parking of 12 tractor-trailer combinations and 24 trucks is not proposed to be reduced, nor are General Plan policies proposed to preclude the land use from developing in the unincorporated County; however, changes have been proposed to the parameters under which facilities, permitted under a use permit or under a Planned Development zoning district following a rezone and/or General Plan amendment, may develop. These parameters or criteria are proposed to address the truck-related issues that have been identified following outreach to both the public as well as local, state, and regional agencies with truck parking in agricultural areas. Based on concerns related to these facilities impacting water and soil quality of

agricultural land due to improper storage of hazardous materials resulting in contaminants leaking onto the bare ground, and based on the Department of Environmental Resources Hazardous Materials Division's reported issues with some applicants and code enforcement sites not accurately reporting and meeting storage requirements for storing hazardous materials such as fuel, engine oil, and coolants, requirements for high quality surface materials, such as pavement, will be required for facilities which propose maintenance activities, to minimize for any potential for groundwater or soil contamination. Other concerns related to aesthetic concerns and visual impacts of truck parking facilities on the character of the surrounding neighborhood or agricultural area, are proposed to be addressed through requirements for high-quality landscaping and screening treatments to be incorporated into the project. Additionally, to further address concerns about productive agricultural land from being converted to a non-agricultural use such as truck parking, the amendment proposes to prohibit any parcel from requesting a Williamson Act Contract cancellation, or parcels greater than 10-acres in size, which is the minimum acreage considered by the Williamson Act to be presumed viable for production agriculture, to limit the extent of larger viable parcels could convert to truck parking uses. Another major change includes an added threshold for what constitutes a concentration, through a limit the number of facilities allowed within a one-mile radius of each other, mirroring the proposed requirements for use permits under PLN2025-0070.

An early iteration of these drafts was presented to the GPUC on June 5, 2025, and updated drafts were presented at an informational meeting held on July 23, 2025 for preliminary input. The informational meeting was advertised to the general public with targeted notification provided to trucking operators with approved truck parking use permits, current and past applicants for truck parking use permits, property owners with parcels under CE cases for unpermitted truck parking, and concerned residents and interested parties who have submitted their contact information to staff for the express purpose of receiving notification of trucking-related items in the County. Community input covered concerns about road conditions, water and soil impacts, requests for clarification on the proposed amended definition of a concentration, questions about exemptions for trucks that haul agricultural produce, fines for unpermitted activities and taxes, allowances to lease parking stalls to independent truckers, and requirements to live on-site.

Refined drafts were presented to the GPUC on August 7, 2025. At the GPUC, members of the public asked if the proposed amendments would require the Planning Commission to take into consideration the location of proximate industrial or commercial land when considering if a truck parking facility request would create a concentration; whether projects will be required to contribute payments to offset impacts to both state and local roadway facilities; and how use permit applications and general plan amendments scheduled for consideration by the Planning Commission and Board of Supervisors will be impacted by the proposed amendments if considered before adoption of the amendments take place. While the location of nearby industrial or commercial land can be considered by the Planning Commission, the amendments as presented to the GPUC and as currently proposed, do not take into account sites with commercial or industrial zoning into the assessment of concentration limiting the siting of facilities. Each request to site a new facility will be subject to case-by-case environmental review that will include, if determined necessary and/or applicable, payment of fair-share contributions to roadway infrastructure improvements, the installation of specific infrastructure improvements, and payment of impact fees. Additionally, the pending consideration of the proposed amendments does not preclude the Planning Commission or Board of Supervisors from considering individual applications for truck parking facilities that are presented to them for consideration.

While the GPUC has voiced support for the draft zoning ordinance amendments presented at the August 7, 2025, meeting, they directed staff to continue working with the AHC to develop concentration standards for the HCPD designation and to present the AHC's recommendation to the Planning Commission as part of the request to consider the amendments. Since August

7th, staff has coordinated with the AHC to identify that large scale truck parking facilities permitted under an HCPD designation should be incorporated and mirror the concentration criteria used for use permits, which is discussed in the *Project Description* section of this report.. Accordingly, the recommendations will be shared with the Planning Commission and Board of Supervisors as part of the staff report for General Plan Amendment No. PLN2025-0070 – *Highway Commercial Planned Development*. The Planning Commission's recommendation on the Zoning Ordinance amendments are expected to be presented to the Board of Supervisors for final consideration at the November 18th meeting, with the recommendations for the General Plan text amendments to be heard at the December 16th meeting.

On September 8, 2025, the amendments recommended by the GPUC were presented to the Agricultural Advisory Board (AAB) at a regularly scheduled meeting for input. Questions raised by members of the AAB included whether the concentration assessment for use permit applications for truck parking would take into account truck parking facilities within city limits. Staff responded that the current drafts will not consider any development within city limits, adopted community plans, or land zoned commercial or industrial in the unincorporated County. At the meeting, a member of the public inquired whether the Board of Supervisors would have the ability to approve or consider projects which do not meet or exceed the recommended criteria, if adopted. Staff responded that projects being considered after adoption of amendments, if any, would require approval of a variance in order to not meet the operational and developmental criteria that may be approved; however, the only exception to the proposed criteria, as currently recommended, is to the concentration threshold. In that instance, the Planning Commission or Board of Supervisors may determine that a concentration is not met, even in the event that approval of a new project request results in more than two truck parking facilities being permitted to develop in a one-mile radius of any property in the County. In order to allow this exception, it must be found that a physical or geographic barrier prevents multiple truck parking facilities from reasonably traveling on the same roadways. The member of the public also expressed to the ad hoc committee that they felt the community was going unheard in spite of repeatedly voicing concerns surrounding trucking-related uses. At the end of the meeting, the AAB voted to unanimously support the amendments provided that enforcement on unpermitted truck parking facilities continue concurrent to efforts to bring updated truck parking requirements to the Planning Commission and Board of Supervisors.

Since the August 7, 2025 General Plan Update Committee (GPUC) and September 8, 2025 Agricultural Advisory Board (AAB) meetings, and circulation of the Early Consultation referrals on September 10, 2025, staff has made minor adjustments to refine the language in the proposed HCPD amendments, and clarifying that gross acreage should be utilized when determining the maximum parcel size suitable for truck parking as a principle use.

Proposed Amendments to General Plan Chapter I – Land Use Element Page I-30

**Added text is shown in bold and underline and deleted text is shown in strikethrough font.*

HIGHWAY COMMERCIAL PLANNED DEVELOPMENT

Intent. This designation is intended for land located at freeway interchanges where it is necessary to provide services to highway travelers **and lands near freeway interchanges are suitable for limited truck parking.**

Zoning. Land within this designation shall be zoned for General Agriculture (A-2) until rezoned to Planned Development (PD). Population density and building intensity will be determined on a case- by-case basis.

Uses within this designation shall be limited to the following as principle uses:

Truck Stops
Truck Parking
Restaurants
Motels
Service Stations
Overnight R.V. Camping
Fruit Stands

The following uses may be permitted, but only when accessory to the uses listed above:

Towing Service
Minor Emergency Automobile Repair
Convenience Market
Wine Tasting

Appropriate Locations. The Highway Commercial Planned Development designation is appropriate ~~only~~ for parcels ~~located adjacent to a~~ freeway interchanges, **with the exception of parcels located near freeway interchanges developed with truck parking facilities as the principal use when meeting the standards established within this designation.** No property shall be designated Highway Commercial Planned Development and rezoned PD unless findings are made that the change will not be detrimental to the agricultural productivity of the surrounding property, **the County's agricultural conversion criteria has been met,** and that the subject property is not considered to be one of the County's most productive agricultural areas.

This designation allows for the development of limited truck parking facilities in order to address impacts to roadway safety and community character which occur when trucks park on the shoulders of public roadways due to lack of available parking facilities. When limited to the principal use of truck parking, this designation is appropriate for parcels located within one-half mile of Interstate 5, State Route 33, State Route 99, State Route 108, State Route 120, State Route 132, State Route 165; or State Route 219, provided:

1. The use does not establish a concentration of more than two truck parking facilities within a one-mile radius of any property, as defined by Chapter 21.89 of the Zoning Ordinance;
2. The establishment of the use does not require the cancellation of a Williamson Act Contract;
3. The parcel on which the use is to be located is no more than 10 gross acres in size and the number of tractor-trailer combinations to be parked on-site, at any one time, does not exceed 80 tractor-trailer combinations and 160 trailers;
4. Permanent, fixed restrooms are developed in accordance with all county and state standards;
5. Roads used to access the use meet all county, city and state requirements for access;
6. High quality landscaping, screening treatments, and parking surface materials are incorporated into the design to enhance community character, minimize conflicts with adjacent properties, provide dust control, and protect groundwater and soils from contamination; and
7. The parcel shall not be developed with any other non-agricultural use unless it is located at a freeway interchange.

When evaluating the agricultural conversion findings required for the redesignation of land to Highway Commercial Planned Development in order to develop truck parking as a principal use, the state-wide shortage of available truck parking facilities and the limited quantity of land adjacent to roadways near interstate and state route corridors with the infrastructure needed to support the movement of trucks should be given great weight and considered on a case-by-case basis. Limitations on the location and concentration of truck parking facilities are intended to discourage piecemeal conversion of larger agricultural areas to non-agricultural uses.

STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: WEST STANISLAUS COUNTY FIRE PROT. DISTRICT

SUBJECT: ORDINANCE AMENDMENT APPLICATION NO. PLN2025-0069 – TRUCK
PARKING

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- ☐ Will not have a significant effect on the environment.
☐ May have a significant effect on the environment.
☒ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

<u>Hugo Rayo</u>	<u>FIRE MARSHAL</u>	<u>09-15-2025</u>
Name	Title	Date



STANISLAUS COUNTY CEQA REFERRAL RESPONSE FORM

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM:

Hill Ferry Cemetery District

SUBJECT: GENERAL PLAN TEXT AMENDMENT APPLICATION NO. PLN2025-0070 –
HIGHWAY COMMERCIAL PLANNED DEVELOPMENT UPDATE

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- ☐ Will not have a significant effect on the environment.
☐ May have a significant effect on the environment.
☒ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

Vanessa Lefler
Name

Secretary
Title

9/16/25
Date



California Department of Transportation

OFFICE OF THE DISTRICT 10 DIRECTOR
P.O. BOX 2048 | STOCKTON, CA 95201
(209) 948-7943 | FAX (209) 948-7179 TTY 711
www.dot.ca.gov



October 2, 2025

10-STA-132-PM 14.98
General Plan Text Amendment
Application No. PLN2025-0070
Highway Commercial Planned
Development Update

Kristen Anaya
Stanislaus County Department of
Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

Dear Ms. Anaya:

The California Department of Transportation (Caltrans) appreciates the opportunity to review the General Plan Text Amendment Application No. PLN2025-0070 - Highway Commercial Planned Development Update. The project site is located in the Unincorporated Stanislaus County.

Caltrans has the following comments:

Traffic Operations

1. Any projects along State Highway involving trucks will need to be reviewed by Caltrans to verify Surface Transportation Assistance Act (STAA).
2. Any projects along State Highway will also need to be reviewed for sight distance for any safety issues.
3. Depending on the proposed Highway parking, there may be parking restrictions. That must be approved by Caltrans, District 10.

If you have any questions, please contact Janet Jaramillo at (209) 986-9825 (email: janet.jaramillo-landeros@dot.ca.gov) or me at (209) 483-2582 (email: tom.dumas@dot.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads 'Janet Jaramillo'.

A handwritten signature in blue ink that reads 'Tom Dumas'.
-for- Tom Dumas
Chief, Office of Metropolitan Planning

**STANISLAUS COUNTY
CEQA REFERRAL RESPONSE FORM**

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: ORDINANCE AMENDMENT APPLICATION NO. PLN2025-0069 – TRUCK
PARKING

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- ☒ Will not have a significant effect on the environment.
☐ May have a significant effect on the environment.
☐ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

1. *SEE ATTACHMENT PAGE 1*
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

1. *SEE ATTACHMENT PAGE 1*
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

SEE ATTACHMENT PAGE 2

Response prepared by:

RANJIT SINGH PATTAR
Name

OWNER
Title

9/17/2025
Date

Specific Impacts Traffic General, Carrying Capacity, Soil types, Air Quality)

1. **Traffic & Circulation:** Truck parking will use existing legal access points, causing minimal impact on public roadways. No significant increase in traffic volume beyond what is typical for agricultural or trucking operations.
2. **Air Quality:** Parking trucks on-site may slightly reduce emissions by eliminating unnecessary trips to off-site storage facilities, supporting better air quality overall.
3. **Noise:** Operations will occur during normal business hours, with minimal idling and no significant nighttime disturbance, keeping noise levels consistent with rural/agricultural use.
4. **Soil & Drainage:** No grading beyond what is already permitted for agricultural use. Permeable or stabilized surfaces will be used where possible to minimize runoff and erosion.

Possible Mitigation Measures

1. **Traffic Safety Improvements:** Ensure proper signage and clear driveways prior to permit issuance to maintain safe ingress/egress for trucks.
2. **Air Quality Controls:** Post and enforce "no-idling" signage on-site prior to operation commencement to limit emissions.
3. **Noise Mitigation:** Restrict routine truck movement to standard daytime hours (unless emergencies occur) as a permit condition to reduce potential disturbance to neighbors.
4. **Drainage & Surface Control:** Implement dust control measures (e.g., gravel, recycled asphalt, or water truck) before site inspection and approval to avoid air quality issues from unpaved areas.

Additional Comments

We strongly support the County's efforts to create clear, fair rules for truck parking. We respectfully request:

- Flexibility in fencing and setback requirements for existing operations to avoid costly unnecessary upgrades when sites are already safe and secure.
- A streamlined renewal process for five-year permits, to ensure trucking businesses can continue operating without delays.
- Reasonable and predictable annual inspections, coordinated with property owners in advance, to prevent operational disruptions.

From: [Christy McKinnon](#)
To: [Kristen Anaya](#)
Cc: [Alondra Estrada](#)
Subject: FW: Stanislaus County CEQA Early Consultation Referral – PLN2025-0069 – Truck Parking - Please Respond by September 30, 2025
Date: Monday, September 22, 2025 2:20:14 PM
Attachments: [PLN2025-0069 Early Consultation.pdf](#)
Importance: High

Hi Kristen,

I have no comments from the Groundwater Division regarding the above project. If you have any questions, please reach out to be during normal business hours.

Respectfully,

Christy McKinnon, R.E.H.S.

Water Resources Manager

Groundwater Resources Division

Stanislaus County Department of Environmental Resources

3800 Cornucopia Way, Suite C,

Modesto, CA 95358

Phone 209-525-6818

Fax 209-525-6774

cmckinnon@envres.org

Kristen Anaya

From: Miranda E. Brumbaugh <mebrumbaugh@TID.ORG>
Sent: Tuesday, September 23, 2025 9:56 AM
To: Planning
Cc: Angela Freitas; Kristin Doud; Kristen Anaya; Angelica Duenas; Patricia Sanchez; Serena Baca
Subject: RE: Stanislaus County CEQA Early Consultation Referral – PLN2025-0070 – Highway Commercial Planned Development Update - Please Respond by September 30, 2025

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

Good morning Angelica,

I'm emailing to confirm TID's receipt of the below referral, **PLN2025-0070 – Highway Commercial Planned Development Update**. Regarding the amendments to the General Plan, we ask that the County continues to include TID on any truck parking development referrals to determine required improvements or appropriate mitigation for impacted TID irrigation facilities.

Thank you,

Miranda Brumbaugh

Project Coordinator

Turlock Irrigation District | 333 East Canal Drive | P.O. Box 949 | Turlock, CA 95381

Office: (209) 883-8362

Cell: (209) 648-4024

mebrumbaugh@tid.org | www.TID.org



From: [Edwin Borquez](#)
To: [Planning](#)
Cc: [Angela Freitas](#); [Kristin Doud](#); [Kristen Anaya](#); [Serena Baca](#); [Patricia Sanchez](#); [Angelica Duenas](#); [Jeremy Ballard](#); [Marcus Ruddicks](#); [Paul Richardson](#); [Jessica Hill](#); [Michael Hren](#); [Katharine Martin](#); [Radha Hayagreev](#); [Vanessa Castro](#); [Michael Schubert](#); [Amber Dick](#)
Subject: FW: Stanislaus County CEQA Early Consultation Referral – PLN2025-0069 – Truck Parking - Please Respond by September 30, 2025
Date: Thursday, September 25, 2025 8:01:07 AM
Attachments: [PLN2025-0069 Early Consultation.pdf](#)
Importance: High

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

Good morning,

The City of Modesto has reviewed the proposed amendments to the Highway Commercial Planned Development (HCPD) land use designation for large-scale truck parking. While we appreciate the County's effort to address unpermitted truck parking, we have significant concerns about how these changes could impact the Modesto Sphere of Influence (SOI), particularly regarding land use compatibility and community character.

The City of Modesto maintains a clear position on this matter: we would not be in favor of such development within our SOI if the general land use designation is Residential or Commercial, or in near proximity to these zoning designations. These areas are not suitable for large-scale truck parking due to potential negative impacts like noise, air quality issues, traffic congestion, and conflicts with existing land uses.

Any proposal for a truck parking facility within the Modesto SOI would only be considered in an industrial zone. This is the only land use designation that is compatible with the scale and nature of such an operation.

Any future development proposed within our SOI would have to meet all City of Modesto standards and regulations, not just those outlined by the County. This includes our specific requirements for design, environmental review, traffic, and public works. Even in an industrial zone, we would require a Planned Development (PD) entitlement. This process allows for a thorough review and ensures that specific conditions and design standards are met to mitigate potential impacts on surrounding properties.

Respectfully,



Edwin Borquez,

Associate Planner

Community & Economic Development Department, Planning Division

Central Valley Regional Water Quality Control Board

29 September 2025

Kristen Anaya
Stanislaus County
Planning and Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354
planning@stancounty.com

COMMENTS TO REQUEST FOR REVIEW FOR THE EARLY CONSULTATION, ORDINANCE AMENDMENT APPLICATION NO. PLN2025-0069 – TRUCK PARKING PROJECT, SCH#2025090604, STANISLAUS COUNTY

Pursuant to the State Clearinghouse's 12 September 2025 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Early Consultation* for the Ordinance Amendment Application No. PLN2025-0069 – Truck Parking 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 Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.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 and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-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

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 (USACE). If a Section 404 permit is required by the USACE, 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 USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE 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 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. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE 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. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources

Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

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 Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. 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 Threat 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 Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

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 *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface 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: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

Ordinance Amendment Application No. - 5 -
PLN2025-0069 – Truck Parking Project
Stanislaus County

29 September 2025

If you have questions regarding these comments, please contact me at (916) 464-4684
or Peter.Minkel2@waterboards.ca.gov.

A handwritten signature in blue ink that reads "Peter G. Minkel". The signature is written in a cursive, flowing style.

Peter G. Minkel
Engineering Geologist

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

September 30, 2025

Via Email Only

Stanislaus County Planning & Community Development
Attn: Kristen Anaya, Senior Planner
planning@stancounty.com
anayak@stancounty.com

Re: HHWP Response to Stanislaus County Referral Early Consultation
Applicant: Stanislaus County Dept of Planning and Community Development
ORDINANCE AMENDMENT APPLICATION NO. PLN2025-0069 – TRUCK
PARKING
Project Location/APN: Unincorporated Stanislaus County
Notice dated: 9/10/2025, Response due by: 9/30/2025

To Whom it May Concern:

The San Francisco Public Utilities Commission, Hetch Hetchy Water & Power (HHWP), received the attached Stanislaus County Referral Early Consultation Notice for the above-referenced project.

HHWP hereby responds with the following comments:

- The San Francisco Public Utilities Commission (SFPUC), Hetch Hetchy Water & Power (HHWP) owns and maintains Right-of-Way (ROW) utility corridors through unincorporated and incorporated Stanislaus County.
- The SFPUC ROW contains above-ground high-voltage power transmission lines and underground water transmission lines.
- Ordinance Amendment Application No. PLN-2025-0069, to amend Chapters 21.20 General Agriculture District (A-2) and 21.94 Home Occupations of the Stanislaus County Zoning Ordinance, and to adopt a new ordinance Chapter 21.89 Truck Parking to update existing allowances for truck parking in the unincorporated General Agriculture (A-2) zoned areas of Stanislaus County is **not compatible with the SFPUC ROW**.
- HHWP will need to conduct a review of this project, including all plans and drawings, to ensure that this project does not interfere with the use of City and County of San Francisco (CCSF) property, prior to approval by the Stanislaus County Planning Commission.
- **A HHWP Project Review and Land Use Application must be submitted to Hetch Hetchy Water and Power for any proposed crossing, use of, proposed rezoning, or work on CCSF-owned land.** I have attached a blank copy of the application for your reference. You may email a completed application to: hhwp_row@sfwater.org.

Please confirm receipt of this email.

Daniel L. Lurie
Mayor

Kate H. Stacy
President

Joshua Arce
Vice President

Avni Jamdar
Commissioner

Stephen E. Leveroni
Commissioner

Meghan Thurlow
Commissioner

Dennis J. Herrera
General Manager

Stanislaus County Planning & Community Development
Attn: Kristen Anaya, Senior Planner
September 30, 2025
Page 2

Thank you in advance for your cooperation and attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mia Ottieri', with a small dot above the 'i'.

Mia Ottieri
ROW Permit Liaison
Hetch Hetchy Water & Power

:mo

Encl: HHWP-completed Stanislaus County CEQA Referral Response Form PLN2025-0069,
dated 9/30/25; HHWP Project Review and Land Use Application
ecc: Dina Brasil, SFPUC Right of Way Manager
Margaret Hannaford, HHWP Division Manager
Adam Mazurkiewicz, Operations & Maintenance Manager
Joy Meller, ROW Manager
John Gisler, HHWP ROW Maintenance Manager
Moccasin Records

STANISLAUS COUNTY
DEPARTMENT OF PLANNING AND
COMMUNITY DEVELOPMENT
1010 10th Street, Suite 3400
Modesto, California 95354

NOTICE OF EXEMPTION

Project Title: General Plan Amendment Application No. PLN2025-0070 – Highway Commercial Planned Development

Applicant Information: Stanislaus County Planning and Community Development, 1010 10th Street, Ste. 3400, Modesto, CA 95354

Phone No: (209) 525-6330

Project Location: Unincorporated County

Description of Project: Request to amend the text of the Highway Commercial Planned Development land use designation in the Land Use Element of the Stanislaus County General Plan to clarify and update policies addressing the development or establishment of large-scale truck parking facilities in the unincorporated areas of Stanislaus County.

Name of Agency Approving Project: Stanislaus County Board of Supervisors

Lead Agency Contact Person: Kristen Anaya, Senior Planner

Telephone: (209) 525-6330

Exempt Status: (check one)

- ☐ Ministerial (Section 21080(b)(1); 15268);
- ☐ Declared Emergency (Section 21080(b)(3); 15269(a));
- ☐ Emergency Project (Section 21080(b)(4); 15269(b)(c));
- ☐ Categorical Exemption. State type and section number: _____
- ☐ Statutory Exemptions. State code number: _____
- ☒ Common Sense Exemption. 15061 (b)(3)

Reasons why project is exempt: This project is Exempt from the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) Common Sense Exemption. This request is a General Plan text amendment for which new projects subject to the amended policy and criteria will require individual project-level environmental to assess project-specific impacts.

Dated

Kristen Anaya
Senior Planner

SUMMARY OF RESPONSES FOR ENVIRONMENTAL REVIEW REFERRALS

PROJECT: GENERAL PLAN AMENDMENT NO. PLN2025-0070 - HIGHWAY COMMERCIAL PLANNED DEVELOPMENT

REFERRED TO:				RESPONDED		RESPONSE			MITIGATION MEASURES		CONDITIONS	
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
CA DEPT OF CONSERVATION: Land Resources / Mine Reclamation	X		X		X							
CA DEPT OF FISH & WILDLIFE	X		X		X							
CA DEPT OF FORESTRY (CAL FIRE)	X		X		X							
CA DEPT OF HOUSING & COMMUNITY DEV					X							
CA DEPT OF TRANSPORTATION DIST 10	X		X	X								
CA DEPT OF WATER RESOURCES	X		X		X							
CA OPR STATE CLEARINGHOUSE	X		X		X							
CA RWQCB CENTRAL VALLEY REGION	X		X	X								
CA STATE LANDS COMMISSION	X		X		X							
CEMETERY DISTRICT	X		X	X				X		X		X
CENTRAL VALLEY FLOOD PROTECTION	X		X		X							
CITY OF: ALL WITHIN STANISLAUS COUNT	X		X	X				X		X	X	
COMMUNITY SERVICES / SANITARY DIST:	X		X		X							
COOPERATIVE EXTENSION	X		X		X							
COUNTY OF: ALL SURROUNDING	X		X		X							
CROP DUSTERS	X		X		X							
DISPOSAL DIST: ALL	X		X		X							
FIRE PROTECTION DIST: ALL	X		X	X								
FLOOD CONTROL DISTRICT: ALL	X		X		X							
GSA: ALL	X		X		X							
HOSPITAL DISTRICT: ALL	X		X		X							
IRRIGATION DISTRICT: ALL	X		X	X								
MOSQUITO DISTRICT: ALL	X		X		X							
MT VALLEY EMERGENCY MEDICAL	X		X		X							
MUNICIPAL ADVISORY COUNCIL: ALL	X		X		X							
PACIFIC GAS & ELECTRIC	X		X		X							
PIPELINES	X		X		X							
POSTMASTER: ALL	X		X		X							
PUBLIC UTILITIES COMMISSION	X		X		X							
RAILROAD: ALL	X		X		X							
SAN JOAQUIN VALLEY APCD	X		X	X				X		X	X	
SAN LUIS/DELTA-MENDOTA WATER AUTH	X		X		X							
SCHOOL DISTRICT 1: ALL	X		X		X							
SCHOOL DISTRICT 2:					X							
STAN ALLIANCE	X		X		X							
STAN CO AG COMMISSIONER	X		X		X							
STAN CO ALUC	X		X		X							
STAN CO ANIMAL SERVICES					X							
STAN CO BUILDING PERMITS DIVISION	X		X		X							
STAN CO CEO	X		X		X							
STAN CO CSA					X							
STAN CO DER	X		X	X				X		X		X
STAN CO ERC					X							
STAN CO FARM BUREAU	X		X		X							
STAN CO HAZARDOUS MATERIALS	X		X	X				X		X	X	

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REFERRED TO:				RESPONDED		RESPONSE			MITIGATION MEASURES		CONDITIONS	
	2 WK	30 DAY	PUBLIC HEARING NOTICE	YES	NO	WILL NOT HAVE SIGNIFICANT IMPACT	MAY HAVE SIGNIFICANT IMPACT	NO COMMENT NON CEQA	YES	NO	YES	NO
STAN CO PARKS & RECREATION	X		X		X							
STAN CO PUBLIC WORKS	X		X		X							
STAN CO RISK MANAGEMENT					X							
STAN CO SHERIFF	X		X		X							
STAN CO SUPERVISOR DIST #: ALL	X		X		X							
STAN COUNTY COUNSEL	X		X		X							
StanCOG	X		X		X							
STANISLAUS FIRE PREVENTION BUREAU	X		X		X							
STANISLAUS LAFCO	X		X		X							
SURROUNDING LAND OWNERS					X							
TELEPHONE COMPANY: ALL	X		X		X							
TRIBAL CONTACTS (CA Government Code §65352.3)	X		X		X							
TUOLUMNE RIVER TRUST	X		X		X							
US ARMY CORPS OF ENGINEERS	X		X		X							
US FISH & WILDLIFE	X		X		X							
US MILITARY AGENCIES (SB 1462) (5 agencies)					X							
USDA NRCS	X		X		X							
WATER DISTRICT: ALL	X		X	X				X		X	X	