Revised Final Initial Study

City of Patterson 2023-2031 6th Cycle Housing Element

January 21, 2026

Prepared by

EMC Planning Group

REVISED FINAL INITIAL STUDY

CITY OF PATTERSON 2023-2031 6TH CYCLE HOUSING ELEMENT

PREPARED FOR

City of Patterson
Bryan Stice, Community Development Director
1 Plaza
P.O. Box 667
Patterson, CA 95363
Tel 209.895.8074
bstice@ci.patterson.ca.us

PREPARED BY

EMC Planning Group Inc.
601 Abrego Street
Monterey, CA 93940
Tel 831.649.1799
Fax 831.649.8399
www.emcplanning.com

January 21, 2026

TABLE OF CONTENTS

A. BACKGROUND 1

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED 11

C. DETERMINATION 12

D. EVALUATION OF ENVIRONMENTAL IMPACTS 13

1. Aesthetics 15
2. Agriculture and Forest Resources 17
3. Air Quality 19
4. Biological Resources 24
5. Cultural Resources 48
6. Energy 51
7. Geology and Soils 55
8. Greenhouse Gas Emissions 59
9. Hazards and Hazardous Materials 63
10. Hydrology and Water Quality 67
11. Land Use and Planning 74
12. Mineral Resources 75
13. Noise 76
14. Population and Housing 78
15. Public Services 79
16. Recreation 84
17. Transportation 85
18. Tribal Cultural Resources 89
19. Utilities and Service Systems 90
20. Wildfire 94
21. Mandatory Findings of Significance 96

E. SOURCES 98

Appendices

Appendix A HCD Revised Draft City of Patterson 2023-2031 6th Cycle Housing Element (October 3, 2025)

Appendix B Housing Element Site Inventory Table

Appendix C City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment (2025) (Illingworth & Rodkin, Inc.)

Appendix D Special-Status Species in the Vicinity of the Housing Sites

Appendix E City of Patterson Housing Element—Vehicle Miles Traveled (VMT) Impact Assessment Memorandum (Kittelson & Associates, Inc.)

Appendix F Comment Letters on Original Notice of Preparation (NOP)

Figures

Figure 1 Location Map 7

Figure 2 Housing Opportunity Sites 9

Figure 3 Habitat Map 27

Figure 4 Special-Status Species in the Project Vicinity 29

Tables

Table 1 City of Patterson Regional Housing Needs Allocation 2

Table 2 Housing Element Site Inventory by Income Category 3

Table 3 Proposed General Plan Land Use and Zoning Amendments to Sites 4

Table 4 Proposed Amendments to General Plan Development Standards 5

Table 5 Housing Element Update Cumulative Operational Period Emissions 20

Table 6 Annual Housing Element Update GHG Emissions (CO_2e) 60

A. BACKGROUND

Project Title	City of Patterson 2023-2031 6th Cycle Housing Element
Lead Agency Contact Person and Phone Number	Bryan Stice, Community Development Director 209.895.8074
Date Prepared	January 21, 2026
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	City of Patterson
Project Sponsor Name and Address	City of Patterson PO Box 667 Patterson, CA 95363
General Plan Designation	Various
Zoning	Various

Purpose for Revised Initial Study

This initial study was originally prepared in November 2025 and accompanied a Notice of Preparation of a Draft EIR (NOP), which was circulated for comment on November 20, 2025, in accordance with CEQA. This initial study has been revised to address comments received on the NOP and initial study from public agencies and members of the public (See Appendix F), as well as to correct information regarding groundwater sustainability that was not factually accurate as to the status of the 2024 Delta Mendota Subbasin Groundwater Sustainability Plan (GSP). The previous initial study did not properly evaluate the impact of the GSP and was incorrect in stating that the "consolidated GSP was released July 29, 2024 and, as of October 2025, has not been adopted by the GSAs or approved by the State Water Resources Control Board." The City of Patterson did adopt the GSP on November 19, 2024.

This revised initial study will be attached to a revised NOP for public comment.

Setting

The City of Patterson is located in central California within the Central Valley, a topographical region situated between the Sierra Nevada Mountains to the east and the Diablo Range to the west. The City lies approximately 15 miles southwest of Modesto in Stanislaus County and encompasses an area of approximately 7.5 square miles. Interstate 5 is located west of the city limits, while State Route 33 runs northwest to southeast through the planning area. The city's topography is generally flat, and the surrounding areas outside city limits are characterized by agricultural uses. The San Joaquin River lies east of the city, and two intermittent streams, Del Puerto Creek and Salado Creek, traverse the planning area. Additionally, the Delta-Mendota Canal and the California Aqueduct border the city to the west.

Figure 1, Location Map, presents the relationship between the City of Patterson and nearby cities and unincorporated Stanislaus County, as well as the state highway system.

Background

Housing Element Update

The City of Patterson (City) has prepared a draft 6th Cycle Housing Element for the 2023 through 2031 planning period, in accordance with California state law. As part of the Housing Element update, the City is required to identify sufficient sites to accommodate its Regional Housing Needs Allocation (RHNA), as determined by the California Department of Housing and Community Development (HCD) and the Stanislaus Council of Governments (StanCOG). For the 6th Cycle, the City has been assigned a RHNA of 3,716 housing units, as shown in Table 1, City of Patterson Regional Housing Needs Allocation. The City of Patterson 2023-2031 6th Cycle Housing Element Revised Draft (dated October 3, 2025) hereinafter referred to as the "Housing Element" can be found in Appendix A.

Table 1 City of Patterson Regional Housing Needs Allocation

Income Group	Percentage of Area Median Income (AMI)	Share
Extremely Low Income[1]	<30	523
Very Low Income	<50	523
Low Income	51-80	724
Moderate Income	81-120	593
Above Moderate Income	121 +	1,353
Total		3,716

SOURCE: StanCOG Adopted Final Regional Housing Needs Allocation Plan, 2022

Description of Project

The proposed project involves updating the City of Patterson's 2015–2023 Housing Element (adopted February 2, 2016) with the 2023–2031 6th Cycle Housing Element. This update is required to ensure consistency with the housing goals and requirements set forth in Government Code Sections 65580 through 65589. Adoption of the Housing Element update would constitute an amendment to the City's general plan.

The Housing Element update identifies sufficient housing sites to meet and exceed the City's RHNA. Appendix B, Housing Element Site Inventory Table, provides detailed information and capacity estimates for each parcel included in the sites inventory. Figure 2, Housing Opportunity Sites, identifies the geographic location of these sites, with site numbers corresponding to those in Appendix B. A total of 16 housing sites has been identified; however, two of these (Sites 15 and 16) are considered pipeline projects that have completed environmental review and are awaiting construction. Additionally, the Housing Element update allocates accessory dwelling units toward meeting the RHNA; however, accessory dwelling units are not required by state law to be evaluated in CEQA. Accordingly, pipeline projects (Sites 15 and 16) and accessory dwelling units are not evaluated in this initial study.

The Housing Element update plans for the development of 4,919 housing units over the eight-year planning period, which exceeds the City's RHNA of 3,716 units by 1,548 units. Using the California Department of Finance's (2025) average household size of 3.57 persons per household for the City of Patterson, development of 4,919 units would result in a projected population increase of approximately 17,560 residents.

The Housing Element update establishes goals, policies, and programs to facilitate the development of these units. Of the total planned units, 2,339 are considered affordable, including very low-, low-, and moderate-income units. Table 2, Housing Element Site Inventory by Income Category, summarizes the income-based breakdown of planned units.

Table 2 Housing Element Site Inventory by Income Category

Site ID and Housing Resource	Very Low-Income Capacity	Low-Income Capacity	Moderate-Income Capacity	Above Moderate-Income Capacity	Total Capacity
(1A and 1B) Zacharias Development Area	356	194	324	2,366	3,240
(2) Baldwin Ranch South Development Area	--	--	91	214	305
(3-14) Vacant/Underutilized Sites	703	588	83	--	1,374
Total	1,059	782	498	2,580	4,919

SOURCE: City of Patterson 2025

For the purposes of environmental review, sites identified in the Housing Element will be evaluated according to anticipated unit type. Units designated for very low- and low-income households are assumed to be multi-family; above moderate-income units are assumed to be single-family; and moderate-income units are split evenly between single-family and multi-family housing. Although past development trends in Patterson have favored single-family housing, moderate-income units are considered affordable and may be delivered through a range of housing types, including smaller-lot single-family homes, townhomes, and lower-density multi-family developments such as duplexes and triplexes. This approach reflects the City's goal of facilitating development of a variety of housing types and provides a representative basis for environmental analysis. Based on this methodology, a total of 2,829 units is evaluated as single-family and 2,090 as multi-family, for a total of 4,919 units assessed in this initial study.

Master Planned Areas

The Housing Element Update Site Inventory also includes sites within one Master Plan encompassing two newly annexed planning areas: the Zacharias Master Plan area and Baldwin Ranch Master Plan area. The Zacharias area is located in the north-central portion of Patterson, and the Baldwin Ranch area is located in the southwest. Adopted in August 2022, the Master Plan provides for the development of the 1,296.4-acre Zacharias area with a mix of residential, mixed-use, commercial, business park, school, park, open space, and stormwater management uses, including a recharge basin and flood retention area. Of this, approximately 786 acres are

designated for residential uses, with an additional 28.2 acres of mixed-use land also supporting residential development. In the 66-acre Baldwin Ranch area, approximately 61 acres are planned for residential use, with the remainder allocated to park space.

This initial study includes these master planned areas and associated housing element units in the analysis in order to provide the cumulative impact of the Housing Element update. However, the housing element opportunity sites in these areas (specifically Site 1A, 1B, and 2) are subject to the mitigation measures in the EIR certified for the master plan in 2022, and the subsequent settlement agreement. The following documents make up the EIR for the master plan areas:

- *Baldwin Master Plan/Zacharias Master Plan Project Draft Environmental Impact Report* (First Carbon Solutions, December 3, 2020);
- *Baldwin Master Plan/Zacharias Master Plan Project Final Environmental Impact Report* (First Carbon Solutions, July 1, 2021); and
- Settlement Agreement, Patterson Irrigation District, et al. v. City of Patterson, et al. Alameda County Superior Court Case No. 23CV028091 (March 4, 2025).

General Plan Land Use and Zoning Designation Amendments

Implementation of the Housing Element update will require land use and zoning designation changes for a number of the identified sites, as detailed in Table 3, Proposed General Plan Land Use and Zoning Amendments to Sites, and Appendix B. Amendments to General Plan density standards are also proposed and summarized in Table 4, Proposed Amendments to General Plan Development Standards.

Table 3 Proposed General Plan Land Use and Zoning Amendments to Sites

Site ID	Land Use Change	Zoning Change	APN	Acreage	Realistic Capacity: Lower-Income Units
6	General Commercial to High Density	GC to HR	048-042-001	5.5	156
7	General Commercial to High Density	GC to HR	048-042-008	3.97	113
8	Low Density to High Density	LR to HR	048-043-002	2.08	59
9	General Commercial to High Density	GC to HR	048-043-015	2.55	72
10	General Commercial to High Density	GC to HR	048-048-007	10.21	283
12	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-007	3.41	48
13	Highway Service Commercial to Mixed-Use	HSC to MU	021-028-008	2.06	29
14	General Commercial to Mixed-Use	GC to MU	021-098-003	8.53	120
				Total Units	880

SOURCE: City of Patterson 2025

Table 4 Proposed Amendments to General Plan Development Standards

Land Use/Zoning District	Existing Standards	Proposed Standards
High Density Residential	Density: 12.1—20.0 Front setback: 25' Rear setback: 20' Height Maximum: 45' (3 stories) Distance between main buildings: 25' Distance between any wall of a main building containing living room windows and any other wall of a main building: 35'	Density: 20.1—35.0 Front setback: 15' Rear setback: 15' Height Maximum: 45' (4 stories) Distance between main buildings: 15' Distance between any wall of a main building containing living room windows and any other wall of a main building: 20'
Neighborhood Commercial	Density: 3.1—10.0 Height Maximum: 32' (2 stories)	Density: 12.0—20.0 Height Maximum: 32' (3 stories)
Downtown Core	Density: 12.1—20.0 Height Maximum: 45' (3 stories)	Density: 20.0—35.0 Height Maximum: 50' (4 stories)
Development Type	**Parking Requirements**	
Single-Family & Multi-Family Residential	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: 2 covered spaces	Studio or 1-bedroom: 1 covered space 2-bedrooms: 1.5 covered spaces 3+ bedrooms: 2 covered spaces
Apartments	Studio: 1 covered space 1-bedroom: 1.5 (1 covered) spaces 2+ bedrooms: 1 covered space and 1 uncovered space 3+ bedrooms: Plus 1 additional guest parking space for every 3-bedroom unit	Studio: 1 covered space 1-bedroom: 1 covered space 2+ bedrooms: 1.5 uncovered spaces 3+ bedrooms: 2 covered spaces
Senior Housing	Same number of spaces required for dwellings or apartments; however, the number of spaces may be reduced if the planning commission makes a finding that not all spaces are needed*	n/a

SOURCE: City of Patterson 2025

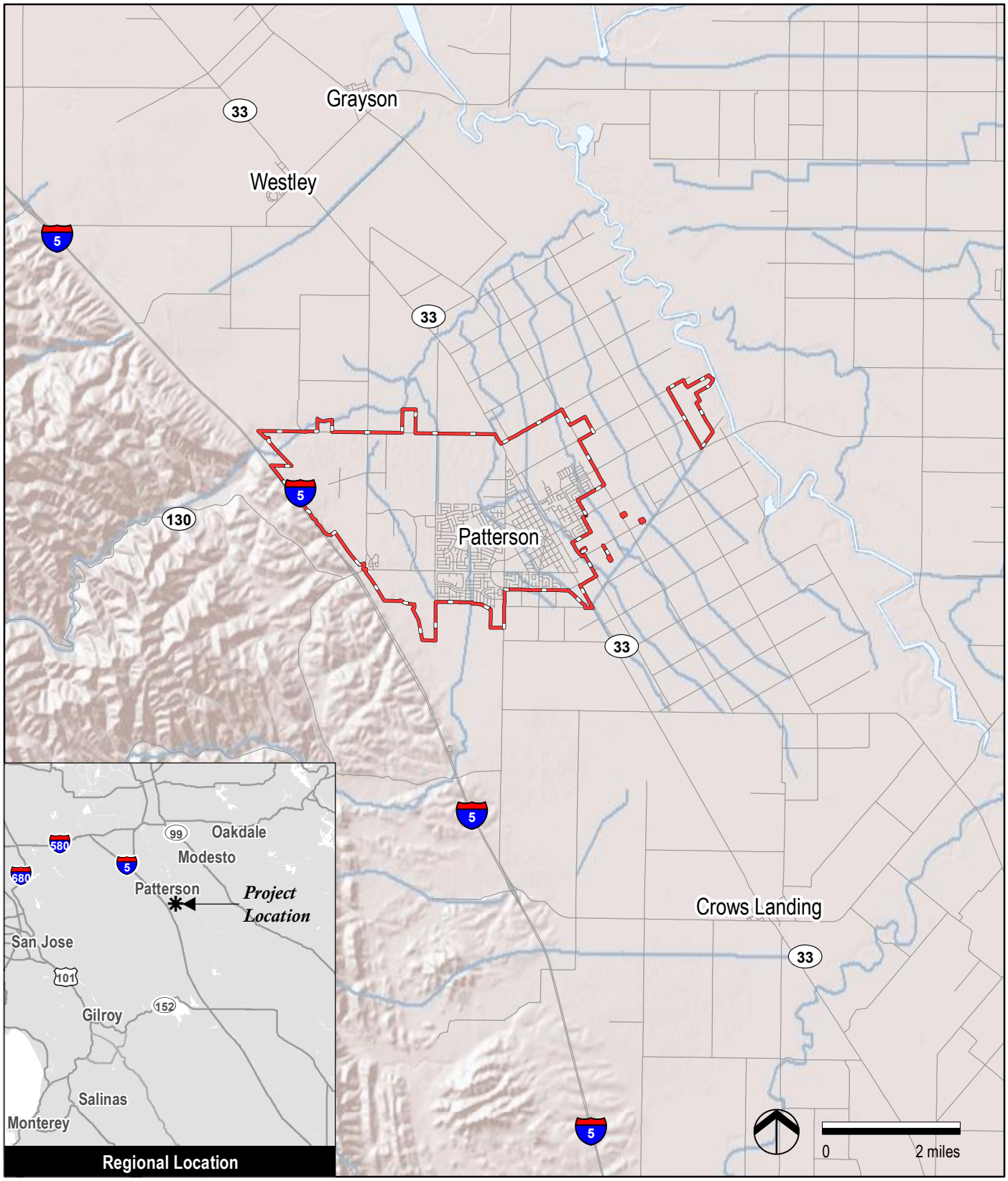
Other Public Agencies Whose Approval is Required

- California Department of Housing and Community Development

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On September 3, 2024, the City distributed consultation letters to Native American tribes traditionally and culturally affiliated with the City of Patterson, inviting consultation pursuant to AB 52 and SB 18. No responses or requests for consultation were received within the statutory response periods.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.



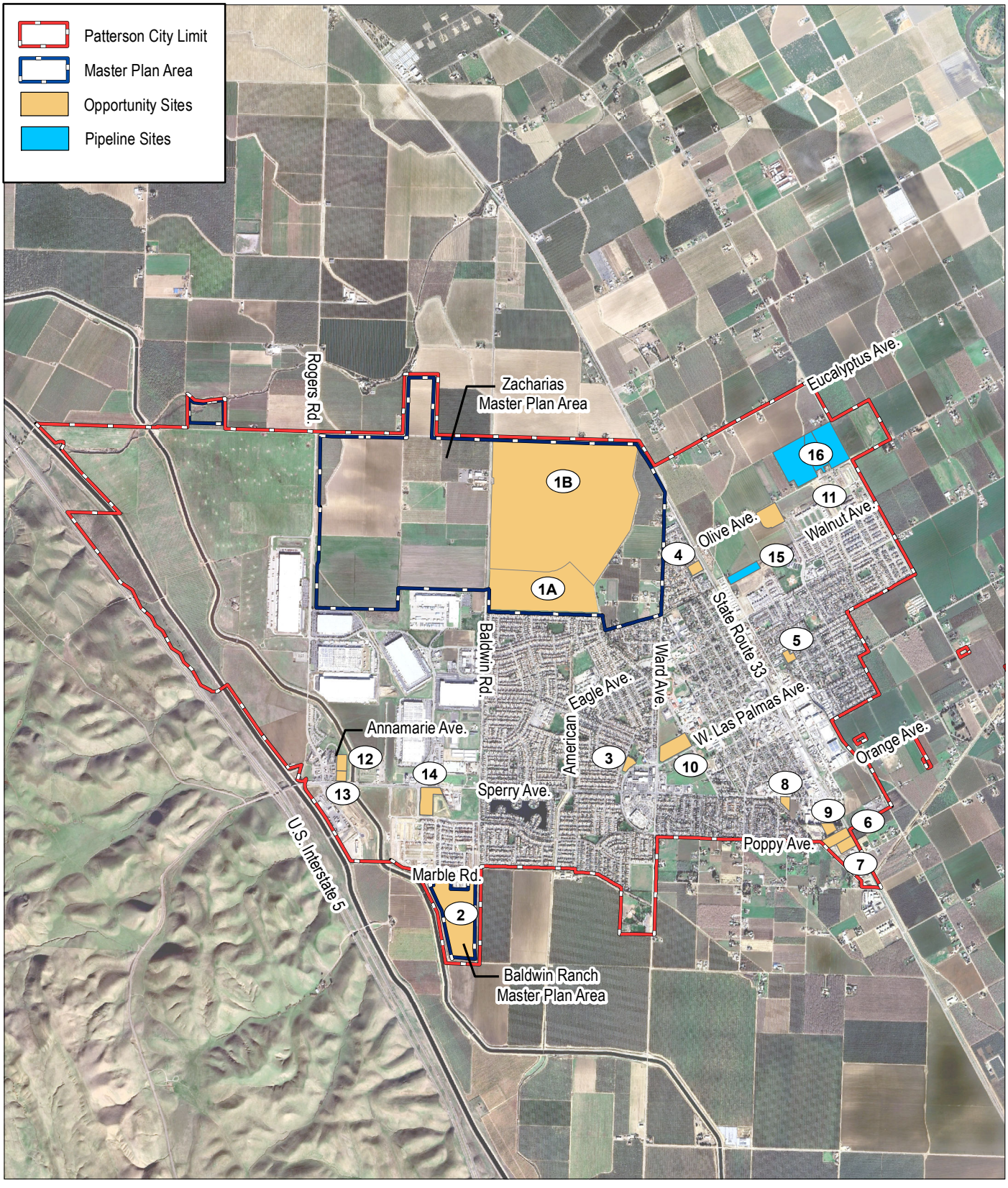
Source: ESRI 2024

Figure 1

Location Map

City of Patterson 2023-2031 6th Cycle Housing Element Initial Study

This side intentionally left blank.



Source: ESRI 2024,
Stanislaus County GIS 2024

Figure 2

Housing Opportunity Sites

City of Patterson 2023-2031 6th Cycle Housing Element Initial Study

This side intentionally left blank.

B. Environmental Factors Potentially Affected

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

☐ Aesthetics	☒ Greenhouse Gas Emissions	☐ Public Services
☐ Agriculture and Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☐ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☐ Biological Resources	☐ Land Use/Planning	☐ Tribal Cultural Resources
☐ Cultural Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☐ Energy	☐ Noise	☐ Wildfire
☐ Geology/Soils	☐ Population/Housing	☐ Mandatory Findings of Significance

C. DETERMINATION

On the basis of this initial evaluation:

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

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

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required, focusing on only those issues identified to be significant and unavoidable.

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

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

_____ _____

Bryan Stice, Community Development Director Date

D. Evaluation of Environmental Impacts

Notes

1. All answers take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
2. Once it has been determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
3. "Negative Declaration: Less-Than-Significant Impact with Mitigation Measures Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from section XVII, "Earlier Analyses," may be cross-referenced).
4. Earlier analyses are used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. [Section 15063(c)(3)(D)] In this case, a brief discussion would identify the following:
    a. "Earlier Analysis Used" identifies and states where such document is available for review.
    b. "Impact Adequately Addressed" identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. "Mitigation Measures"—For effects that are "Less-Than-Significant Impact with Mitigation Measures Incorporated," mitigation measures are described which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
5. Checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances, etc.) are incorporated. Each reference to a previously prepared or outside document, where appropriate, includes a reference to the page or pages where the statement is substantiated.
6. "Supporting Information Sources"—A source list is attached, and other sources used or individuals contacted are cited in the discussion.
7. The explanation of each issue identifies:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any to reduce the impact to less than significant.

8. The explanation of each issue should identify:
    a. The significance criteria or threshold, if any, used to evaluate each question; and
    b. The mitigation measure identified, if any, to reduce the impact to less than significance

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c.	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Comments:

a. According to the General Plan EIR (2010), Patterson's predominant scenic resources are the Diablo Range foothills to the west, its extensive residential tree canopy, and the geometric landscape pattern formed by broad open fields and densely planted orchards. With few exceptions, orchards screen views at the urban edge. All of the housing opportunity sites are within city limits, with several being infill locations that would be visually compatible with surrounding development and would not affect views of adjacent agricultural lands. New development must comply with City design and development standards (e.g., building height and exterior lighting) to minimize impacts on scenic resources. Therefore, development of infill housing opportunity sites would not have substantial adverse impacts on scenic vistas.

Several housing opportunity sites are located within the Zacharias (north-central) and Baldwin Ranch (southwest) master plan development areas. These areas, previously annexed and largely undeveloped, would experience a more noticeable change in visual character than infill locations, including conversion of visible fields and alteration of the urban edge.

The *Baldwin Ranch and Zacharias Master Plan Environmental Impact Report* (2020) considered the impacts development in these areas would have on scenic vistas and concluded scenic-vista impacts to be less than significant (City of Patterson 2020, p. 3.1-7). In the Baldwin Ranch Master Plan area, limited buildout and its location—south of the City's Corporation Yard and east of the Delta-Mendota Canal—restrict visibility to adjacent areas, avoiding effects on Diablo Range views. At Zacharias, height limits (≤35 feet for residential, commercial, and schools; ≤45 feet for industrial) and setback requirements ensure development would not obstruct foothill views from existing developed parts of Patterson (City of Patterson 2020).

Projects located in the master plan areas must comply with the applicable master plan and City design standards (e.g., height, landscaping/edge treatments, and lighting), and project-level review may require setbacks, buffers, and building articulation to minimize adverse effects on scenic agricultural resources. Therefore, impacts associated with development of the housing opportunity sites would be less than significant.

b. According to Caltrans (2025), Interstate 5 located just west of Patterson city limits is an officially designated State Scenic Highway within Stanislaus County. As noted under checklist item "a," future housing projects will undergo project-level review and must comply with City and master plan design standards (e.g., height, massing, setbacks, landscaping). Compliance with these standards would minimize potential effects on scenic resources, including views from Interstate 5 to a less-than-significant level.

c. All housing opportunity sites are within the City of Patterson's urbanized city limits. Sites at the urban edge, including the Zacharias and Baldwin Ranch Master Plan areas, were previously annexed and planned for urban uses; the Master Plan EIR (2020) found their visual effects compatible with adjacent development, with no obstruction of Diablo Range views and visibility at Baldwin Ranch largely confined to nearby areas. Accordingly, the project would not substantially degrade public views in nonurbanized areas. Future development must comply with applicable zoning, master plan design standards (e.g., building height, setbacks, landscaping, lighting), and considerations for views from the State-designated Scenic Highway (Interstate 5). Compliance with these standards through project-level review would ensure that future development would not conflict with regulations governing scenic quality.

d. Development of the housing opportunity sites would create new sources of light or glare; however, lighting associated with associated housing development would be similar in type and intensity to existing urban lighting and must conform to the City's Zoning Code and applicable design guidelines. The General Plan EIR (2010) concludes that existing municipal code regulations, together with General Plan policies, would avoid substantial light or glare and reduce potential impacts to less than significant.

For sites within the Zacharias and Baldwin Ranch master plan development areas, the Master Plan EIR concludes that placing similar land uses adjacent to each other, using stormwater basins as buffers between residential and nonresidential uses, and employing downward-directed, shielded fixtures will minimize intrusive lighting and glare to less-than-significant levels.

2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b.	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Comments:

a. Impacts to agricultural resources associated with the potential conversion of important farmland, as identified by the Farmland Mapping and Monitoring Program, were previously analyzed in the General Plan EIR (2010) and the Baldwin Ranch and Zacharias Master Plan EIR (2020). Applicable mitigation measures from the General Plan EIR and Master Plan EIR would be applied. Therefore, these impacts are not addressed further in this initial study.

b. According to the California Department of Conservation Williamson Act Enrollment Finder (2022), none of the sites identified in the Housing Element are subject to Williamson Act contracts. With respect to zoning, all agricultural land within the City of Patterson's city limits is designated for urban uses under the City's General Plan. Therefore, development of sites identified in the Housing Element would not conflict with existing zoning for agricultural use or a Williamson Act contract.

c-d. There are no forest lands or timberlands within the City of Patterson, and therefore, development on any of the housing sites identified in the Housing Element would not result in the loss of forest land or conversion of forest land to non-forest use.

e. Although development of certain sites identified in the Housing Element would result in the conversion of Important Farmland to non-agricultural uses, as discussed under checklist item "a" above, there is no evidence to suggest, and it would be speculative to assume, that such development would induce the conversion of additional farmland beyond the identified sites.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d.	Result in other emissions, such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Comments:

The discussion in this section is based primarily on the *City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment* (hereinafter "air quality assessment") prepared by Illingworth & Rodkin, Inc. on October 23, 2023. It is included as Appendix C.

a. The City of Patterson is located in the San Joaquin Valley Air Basin, which is within the jurisdiction of the San Joaquin Valley Air Pollution Control District ("air district").

The air district has established criteria in its Guidance for Assessing and Mitigating Air Quality Impacts to determine when a project may result in significant regional emissions. Under this guidance, any development project that individually exceeds the air district's significance thresholds for reactive organic gases (ROG) or nitrogen oxides (NO_x) is also considered to result in a significant cumulative air quality impact. Localized impacts related to carbon monoxide (CO) and toxic air contaminants (TACs) are considered cumulatively significant when combined emissions from a project and nearby existing or planned development exceed the thresholds identified by the air district.

Construction and operation of Housing Element projects would generate emissions of air pollutants both locally and regionally. However, with implementation of a dust control plan as required by the air district and additional emission reductions achieved through

the District's Rule 9510 (Indirect Source Review) or, where necessary, through Voluntary Emission Reduction Agreements (VERAs), construction-period emissions would remain below CEQA significance thresholds. Any additional construction occurring concurrently in the area would also be subject to air district Regulation VIII (Fugitive PM_{10} Prohibitions), Rule 9510, and potentially VERAs, further minimizing cumulative construction emissions.

Operational emissions from residential and related development under the Housing Element are also expected to remain below CEQA significance thresholds with compliance with air district rules and programs. Because future development accommodated under the Housing Element would be reviewed on a project-level basis and required to be consistent with and subject to the applicable air district regulations, the project would not conflict with or obstruct implementation of the applicable air quality plan.

b. The San Joaquin Valley is in state non-attainment for ozone, respirable particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$), and in federal non-attainment for ozone. The air district does not establish criteria pollutant thresholds for plans such as the Housing Element update; thresholds apply at the project level and would be evaluated for each future residential development.

Construction of Housing Element projects would generate temporary emissions of fugitive dust (PM_{10} and $PM_{2.5}$), nitrogen oxides, and reactive organic gases from equipment use and site disturbance. Operational emissions would occur from increased vehicle trips and area-source activities. According to the air quality assessment, most infill and smaller residential projects would likely have emissions below the air district's significance thresholds, while large master-planned projects may exceed them.

Table 5, Housing Element Update Cumulative Operational Period Emissions, reports projected emissions from complete buildout of the Housing Element Site Inventory in terms of average tons per year operational emissions.

Table 5 Housing Element Update Cumulative Operational Period Emissions

Scenario	Annual Emissions in Tons/Year				
	NOx	ROG	PM_{10}[1]	$PM_{2.5}$[1]	CO
Housing Element Update Plan in 2040	18.04	48.57	37.33	9.90	127.63
Air District Project-Level Thresholds (tons per year)	10 tons/yr	10 tons/yr	15 tons/yr	15 tons/yr	100[2] tons/yr

SOURCE: Illingworth & Rodkin, Inc. 2025

NOTE: 1 Includes both exhaust and fugitive dust emissions.
2 Significant if emissions exceed 100 tons per year and then contribute to violation of the NAAQS/CAAQS

As shown, average tons per year emissions for NO_x, ROG, PM_{10}, and CO would exceed the air district significance thresholds applied to individual projects. CalEEMod model outputs and emissions calculations for the Housing Element are included in Appendix C.

The following General Plan policies and implementation measures regulate construction-related air emissions and apply to projects developed under the Housing Element update.

- Policy AR-1.3 (CEQA Review): Requires the City to use the environmental review process to identify, avoid, or mitigate potentially significant air quality impacts and to consult early with the San Joaquin Valley Air Pollution Control District on project-specific air quality issues;
- Policy AR-1.4 (Air Quality Mitigation): Requires all air quality mitigation measures to be feasible, implementable, and cost-effective;
- Policy AR-1.6 (Innovative Strategies): Encourages coordination with the Air Pollution Control District and project applicants to identify innovative mitigation measures that reduce emissions;
- Policy AR-5.1 (Particulate Control): Directs the City to work with the Air Pollution Control District to reduce particulate emissions from construction, grading, excavation, and demolition to the maximum extent feasible; and
- Policy AR-6.3 (Vehicle Idling): Calls for circulation improvements and design features that reduce vehicle idling and associated emissions.

Implementation measures adopted under General Plan Policy AR-6 require project applicants to apply dust-control and emissions-reduction practices during construction, including stabilization of disturbed soils and unpaved roads, wetting of surfaces and stockpiles, covering of haul trucks, removal of mud and debris from paved roads, speed limits on unpaved surfaces, and suspension of grading activities during high-wind conditions.

In addition to General Plan policies, the air district's Rule 9510 (Indirect Source Review) applies to projects that generate more than two tons per year of nitrogen oxides or particulate matter (PM_{10}). Rule 9510 requires projects to reduce uncontrolled exhaust emissions by 20 percent for nitrogen oxides and 45 percent for particulate matter from unmitigated levels, achieved through on-site measures such as use of cleaner equipment or, if needed, through off-site mitigation fees. When on-site measures are insufficient, project proponents may enter into a Voluntary Emissions Reduction Agreement (VERA) with the air district to fund off-site emission reductions.

Cumulatively, the proposed project would result in significant operational air quality impacts. Implementation of the following mitigation measures would ensure these impacts are less than significant.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable air quality mitigation measures in the Master Plan EIR.

Mitigation Measure (Site 3 – 14)

AQ-1 Under General Plan Policy AR-1.3, the City shall require individual projects to address air quality impacts. Projects that are larger in size than the small project analysis level screening sizes (see Table 5 in Appendix C) shall prepare a project-level air quality analysis. Under Policy AR-1.4, the City shall require mitigation measures to reduce air pollutant emissions. Application of air district Regulation VIII requires dust control measures for grading projects. Rule 9510 would require reductions in NO_x and PM_{10} emissions of up to 20 and 45 percent, respectively. Project applicants would enter into a contractual agreement with the air district to provide funding to the air district to implement emission reductions if emissions exceed thresholds with the implementation of Policy AR-1.4, Regulation VIII, and Rule 9510.

Together, these City policies and implementation measures, air district programs, and Mitigation Measure AQ-1 ensure that all development under the Housing Element incorporates feasible, enforceable controls to minimize construction and operational emissions and prevent a cumulatively considerable net increase in criteria pollutants. Impacts would be less than significant.

c. **Construction-Period Toxic Air Contaminant (TAC) Effects**

Construction of residential projects accommodated under the Housing Element update would involve the use of heavy-duty diesel-powered equipment and vehicles that generate diesel particulate matter, a toxic air contaminant. These emissions would be temporary, intermittent, and localized, occurring primarily during grading and site preparation activities. Although diesel particulate matter emissions are associated with a potential health risk to nearby sensitive receptors, these emissions would diminish rapidly with distance and cease once construction is complete. Residential land uses themselves are not major sources of TAC emissions; such emissions are typically associated with industrial operations, highways, rail lines, or facilities permitted by the air district.

To minimize construction-period health risk impacts, Mitigation Measure AQ-1 requires projects that are larger in size than the small project analysis level screening sizes to identify and apply feasible measures to reduce air pollutant emissions. These analyses must ensure compliance with air district Regulation VIII (Fugitive Dust Prohibitions) and Rule 9510 (Indirect Source Review), which together reduce particulate matter emissions, including diesel particulate matter, from construction equipment and activities.

Operational TAC Effects on New Housing Element Receptors

The Housing Element would introduce new sensitive receptors in the form of future residents. The City's General Plan Policy AR-4.1 and Implementation Measure AR-9 aim to separate sensitive land uses from significant sources of air pollutants or odors where feasible. Potential sources of TAC emissions near Housing Element sites include Interstate 5, State Routes 33 and 130, the California Northern Freight Rail Line, and stationary sources such as gasoline stations, warehouses, and diesel back-up generators.

Implementation of the following additional mitigation measure would ensure protection of new sensitive receptors.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable air quality mitigation measures in the Master Plan EIR.

Mitigation Measure (Sites 3-14)

AQ-2 The City shall require preparation of a site-specific health risk assessment for housing projects located within the following recommended distances from identified sources of toxic air contaminants:

- Interstate 5 – 500 feet (from edge of roadway);
- State Routes 33 and 130 – 200 feet (from edge of roadway);
- California Northern Freight Rail Line – 200 feet;
- Warehouses/Distribution Centers – 1,000 feet (from loading docks); and
- Gasoline Dispensing Stations – 300 feet (from edge of fueling canopy).

Site-specific modeling of future specific residential projects proposed within these distances would provide a more accurate basis upon which these buffer distances may be reconsidered and reduced.

For projects within the specified distances from identified sources, conduct a site-specific health risk assessment using air quality dispersion modeling methodologies and screening thresholds recommended by the air district to demonstrate that, despite a location within the screening setback distances, modeled site-specific exposures would be below the air district recommended threshold of 20 excess cancer risks.

Where residential sites are proposed to be located within the setback distances specified above, or identified through site-specific health risk assessment that indicates significant exposure, then appropriate air filtration systems (e.g., MERV13 or 16) systems shall be installed and maintained. The system effectiveness requirement shall be determined during final design, when the predicted level of exposure is known.

In addition, General Plan Policy AR-1.3 requires the City to use the CEQA process to identify and mitigate significant air quality and health risk impacts, while air district Rule 9510 ensures reductions in particulate matter emissions that include diesel particulate matter during construction.

Compliance with and implementation of the City's General Plan policies, air district programs, and Mitigation Measures AQ-1 and AQ-2 would reduce potential impacts to less than significant.

d. During construction, operation of diesel-powered equipment and vehicles would generate temporary localized odors. These odors would be short-term and are not expected to be perceptible for extended periods or beyond the immediate vicinity of the construction site. Upon completion, residential uses associated with the project would not be expected to generate objectionable odors.

4. BIOLOGICAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.), through direct removal, filing, hydrological interruption, or other means?	☐	☒	☐	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Comments:

This section evaluates the potential effects of development pursuant to the Housing Element update on sensitive biological resources present on or in the vicinity of the housing opportunity sites in the City of Patterson. The Housing Element update identifies housing sites on vacant and underutilized residential sites, infill sites, redevelopment within already developed areas, and master plan areas including farmland.

This evaluation utilizes the federal, state, and regional/local regulatory framework pertaining to biological resources and anticipates impacts to biological resources as a result of the development of the housing opportunity sites. This evaluation is a high-level analysis for the proposed Housing Element update. Specific subsequent projects and their potential effects on biological resources are not fully known at this time. Accordingly, this analysis uses a programmatic approach to evaluating potential impacts to sensitive biological resources that may result from future housing development projects, corresponding with the conceptual level of project information available. The proposed project includes the potential future development of 3,716 housing units.

Information in this section is derived from various sources including:

- *City of Patterson 2010 General Plan* (2010);
- City of Patterson Code of Ordinances (2025);
- California Department of Fish and Wildlife (CDFW) *California Natural Diversity Database* (CDFW 2025a, CDFW 2025b);
- California Native Plant Society (CNPS) *Inventory of Rare and Endangered Plants Database* (CNPS 2025); and
- U.S. Fish and Wildlife Service (USFWS) *Information for Planning and Consultation* (USFWS 2025a) and *National Wetlands Inventory Database* (USFWS 2025b).

EMC Planning Group assessed the housing opportunity site locations shown in Figure 2, Housing Opportunity Sites, and reviewed biological resource database accounts, aerial photographs, technical background information, and policies applicable to projects located in City of Patterson. This included searching the sources listed above to identify special-status plants, wildlife, and habitats known to occur in the vicinity of the housing sites.

Environmental Setting. The proposed housing opportunity sites are located within the City of Patterson in Stanislaus County, California. The City of Patterson is situated on the Patterson and Crows Landing U.S. Geological Survey (USGS) 7.5-minute quadrangle maps, and has a generally flat topography and an average elevation of 125 feet above sea level. Patterson is within the Central Valley Bioregion, which encompasses a diversity of plant communities ranging from oak woodlands and grasslands to riparian forests and farmland. The bioregion is also California's top agricultural area. Extensive wetlands are found east of Patterson, formed by the San Joaquin River. The climate in the area is Mediterranean, with hot and dry summers, and winters tending to be cool and wet. Most of the annual rainfall occurs between the months of December and March.

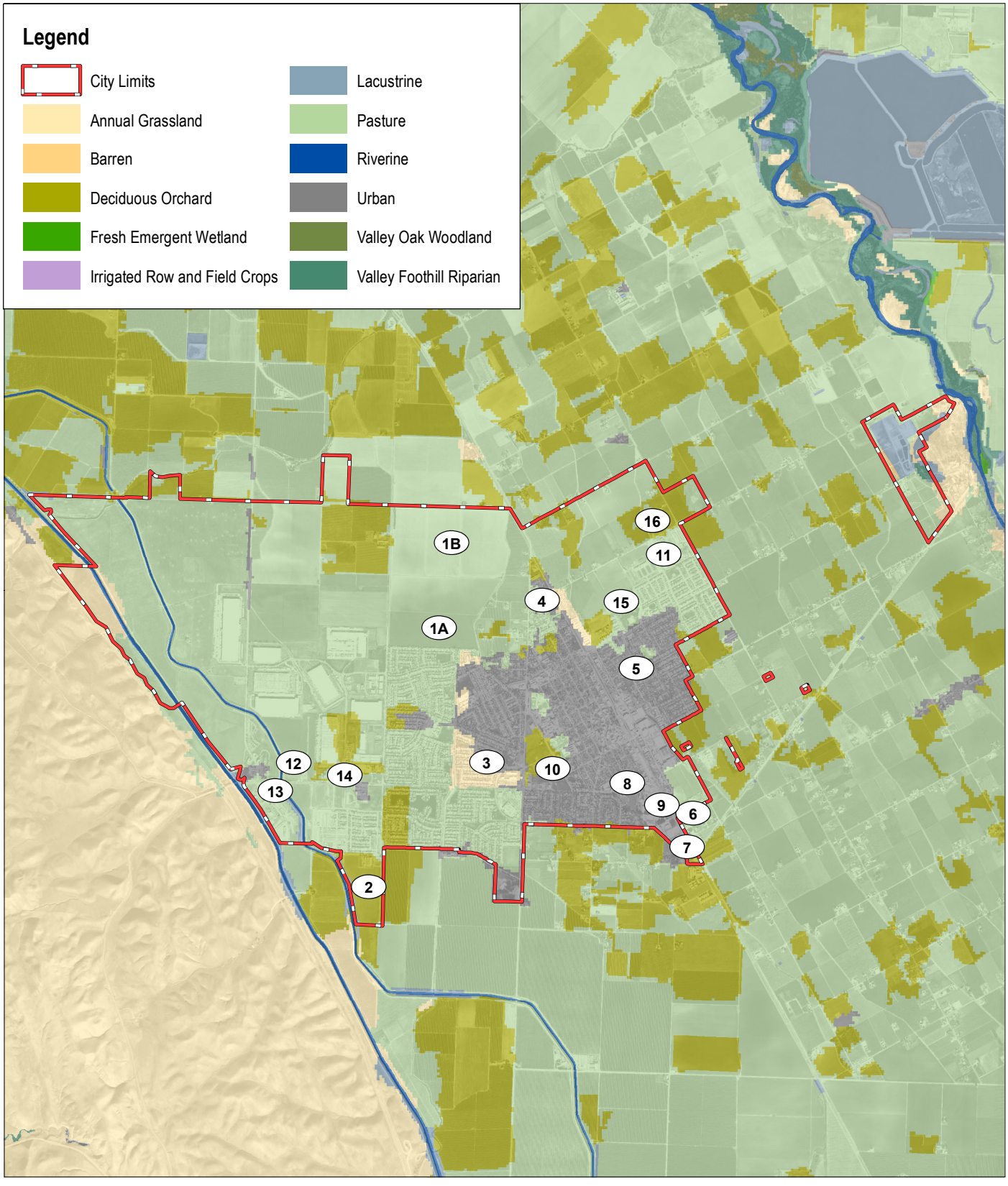
Patterson is comprised primarily of single-family homes with commercial and light industrial land uses and is bisected by State Route 33. The adjacent unincorporated areas are predominately under agricultural use and contain scattered single-family ranchette residences. See Figure 3, Habitat Map.

Plant Communities and Wildlife Habitat. The plant and wildlife habitat on the proposed housing sites within the developed area is considered low quality for native species and would not be adequate to support special-status species. Urban plant and wildlife habitats within Patterson include parks, vacant lots, gardens, yards, and an abundance of trees. Potential habitat on or immediately adjacent to urban housing sites include gardens with a diverse variety of shrubs and trees. This habitat supports urban-adapted bird and wildlife species such as American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), Eurasian collared-dove (*Streptopelia decaocto*), California scrub-jay (*Aphelocoma californica*), California towhee (*Melozone crissalis*), dark-eyed junco (*Junco hyemalis*), Anna's hummingbird (*Calypte anna*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), striped skunk (*Mephitis mephitis*), and western gray squirrel (*Sciurus griseus*). Nesting birds, protected by the Migratory Bird Treaty Act, are abundant during the nesting season (January 15 through September 15). Bat species could also potentially be present within the developed areas of Patterson.

Proposed housing sites on the urban edges support slightly higher quality plant and wildlife habitats than within the city center and may harbor special-status species, however disturbance from development and agricultural activities limit habitat quality. These areas could be vacant lots or agricultural lands within the city limits, or adjacent farmland to be annexed. Agricultural land cover encompasses all areas where the native vegetation has been cleared for agricultural use. These areas include orchard, row-crop, hay and pasture, and disked fallow land. Wildlife habitat quality within areas of agricultural land cover is considered low due to the high level of disturbance from farm activities.

a. **Special-Status Species.** Special-status species are those listed as Endangered, Threatened, or Rare, or as candidates for listing by the U.S. Fish and Wildlife Service and/or California Department of Fish and Wildlife; as Species of Special Concern or Fully Protected species by the California Department of Fish and Wildlife; or as Rare Plant Rank 1B or 2B species by California Native Plant Society. Appendix D, Special-Status Species in the Vicinity of the Housing Sites, presents tables with database search results, and lists special-status species documented within the vicinity of the housing sites, their listing status and suitable habitat description, and their potential to occur on the housing sites. Figure 4, Special-Status Species in the Project Vicinity, presents a map of California Natural Diversity Database results.

   The housing opportunity sites within the Patterson city limits provide very limited to no habitat for most special-status species known to occur in or near the City of Patterson, however development facilitated by the Housing Element could impact individual trees and pockets of vegetation in the urbanized areas of Patterson. Areas that could provide some marginal habitat for special-status species are primarily located on the City periphery and on and adjacent to agricultural areas. Many raptor species, such as Swainson's hawk (*Buteo swainsoni*), depend on these habitats for foraging and nesting habitat. Other special-status and protected species that may be found on the City edges and adjacent farmland include American badger (*Taxidea taxus*), San Joaquin kit fox (*Vulpes macrotis mutica*), burrowing owl (*Athene cunicularia*), hoary bat (*Lasiurus cinereus*), pallid bat (*Antrozous pallidus*), western red bat (*Lasiurus blossevillii*), loggerhead shrike (*Lanius ludovicianus*), and protected nesting birds.



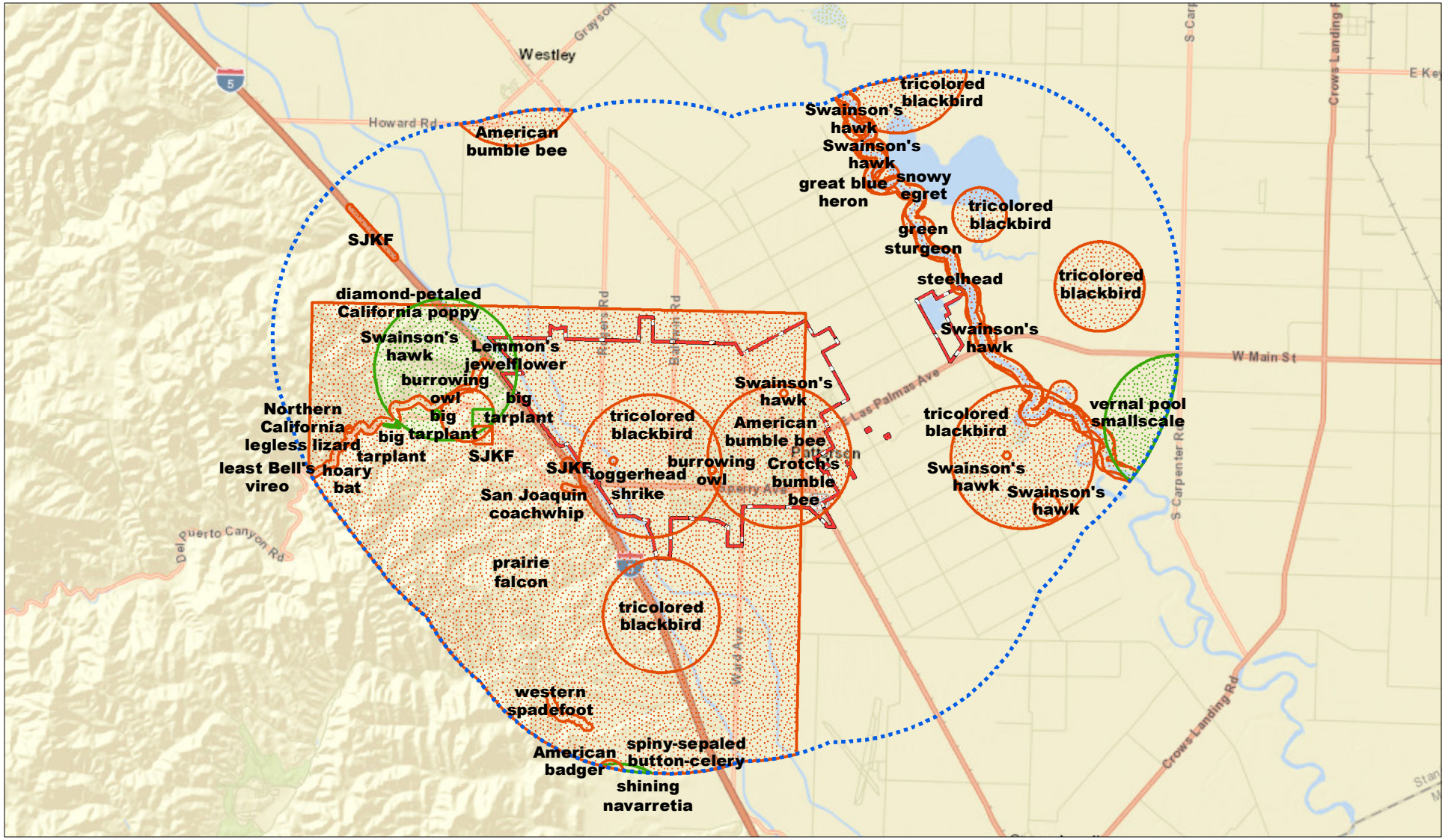
Source: ESRI 2025, CalVEG 2019

Figure 3

Habitat Map

City of Patterson 2023-2031 6th Cycle Housing Element Initial Study

This side intentionally left blank.



0 2 Miles

City Limit
3-Mile Buffer
Special-Status Plants
Special-Status Wildlife

Source: ESRI 2025, CDFW CNDDB 2025
SJKF: San Joaquin Kit Fox

Figure 4

Special-Status Species in the Project Vicinity

City of Patterson 2023-2031 6th Cycle Housing Element Initial Study

This side intentionally left blank.

Special-Status Plant Species. There were 28 special-status plant species documented in the vicinity of Patterson that were assessed for their potential to occur on or adjacent to a housing site. Twenty-six (26) special-status plant species are considered unlikely to occur (Appendix D) due to the absence of suitable undisturbed habitats, such as alkaline soils and vernal pools. One species was determined to have the potential to occur within one or more housing sites: big tarplant (*Blepharizonia plumosa*).

Big tarplant is listed as a California Rare Plant Rank (CRPR) 1B.1 species. Preferred habitats include dry hills and plains in annual grassland with clay to clay-loam soils. Species also occurs on disturbed slopes and often in burned areas. The blooming period is from July - October. This species has been observed four times within six miles of the Patterson (Occurrence Nos. 50, 37, 51, and 3, CNDDB 2025b). This species has low potential to occur in dry annual grassland habitats found within proposed housing sites 4, 5, 6, 7, 10, 12, 13, and 15.

Impacts to special-status plant species are considered significant, if present. Implementation of the following mitigation measure would reduce potential, significant impacts to big tarplant to a less-than-significant level.

Mitigation Measure

BIO-1 Focused Plant Surveys (Housing Sites 4, 5, 6, 7, 10, 12, 13, 15). Prior to ground disturbance within housing sites 4, 5, 6, 7, 10, 12, 13, or 15, a biologist qualified in botany shall conduct a focused survey big tarplant in accordance with current California Department of Fish and Wildlife and California rare plant survey protocols (CDFW 2018 and CNPS 2001). Some special-status plant species are only identifiable during their blooming periods and surveys are only considered valid if they occur when blooms are visible. The survey should occur during the peak blooming period for this species to determine their presence or absence. Based on the known blooming period for this species, two surveys would be necessary to adequately survey the housing site: the first in July/August and the second in September/October. If possible, known reference populations of the target species in the project vicinity should first be visited to verify that the species is observable, and the focused survey should be conducted within two weeks of observing the reference population in full bloom.

The biologist should then prepare a brief report documenting the results of the surveys which will be submitted to the City of Patterson Planning and Development Department prior ground disturbance. If the focused surveys conclude that special-status plant species are not present within the housing site boundary, or if they are present but impacts to them can be completely avoided, then no further measures would be required.

If the focused surveys identify special-status plant species within the housing site boundary and they would be affected by the proposed project, then appropriate avoidance and minimization measures should be developed by the biologist and implemented by the project applicant prior to ground disturbance. Measures may include, but are not limited to:

a. A qualified biologist should identify an on-site or off-site mitigation area suitable for restoration of habitat and seed transplantation for any special-status plant species.

b. Prior to ground disturbance, a qualified biologist or native plant specialist should perform seed collection from all special-status plants located within the impact areas and implement seed installation at the mitigation area at the optimal time. Additionally, topsoil from the special-status species occurrence area(s) should be salvaged (where practical) for use in the mitigation area.

c. A maintenance and monitoring program should be developed by a qualified biologist and established for a minimum of five years after mitigation area installation to verify that restoration activities have been successful. Maintenance activities may include, but not be limited to, watering during the plant establishment period, supplemental seed planting as needed, and removal of non-native plants. Monitoring should include, at a minimum, quarterly monitoring reports for the first year and annual reports for the remaining four years. The performance standard for successful mitigation should be a minimum 1:1 replacement ratio (i.e., one plant observed in mitigation area for each plant lost from the housing site) achieved in at least one of the five years of monitoring.

Special-Status Wildlife Species. Of the 39 special-status wildlife species assessed for their potential to occur on or adjacent to the proposed housing sites, nine species were determined to have the potential to occur along the City edges and within adjacent farmland: burrowing owl, California horned lark, Crotch's bumble bee, San Joaquin kit fox, Swainson's hawk, hoary bat, pallid bat, Townsend's big-eared bat, western red bat, and protected nesting birds (Appendix D). These species are discussed further below.

Burrowing Owl. A California Species of Special Concern and a candidate for higher listing under the California Endangered Species Act, burrowing owls live and breed in burrows in the ground, especially in abandoned California ground squirrel burrows. Optimal habitat conditions include large open, dry and nearly level grasslands or prairies with short to moderate vegetation height and cover, areas of bare ground, and populations of burrowing mammals. This species has been observed approximately one mile west (Occurrence No. 588, CNDDB 2025b) and approximately four miles northwest of Patterson (Occurrence No. 144, CNDDB 2025b). The likelihood of this species occurring on a proposed housing site is considered low. However, burrowing owl utilize undeveloped annual grasslands present within hosing sites 4, 5, 6, 7, 9, 10, 12, 13, or 15. If burrowing owl is present on or adjacent to a housing site, construction activities could result in the loss or disturbance of individual animals. Loss or harm to burrowing owl is considered a significant, adverse impact. Implementation the following mitigation measures would reduce potential, significant impacts to burrowing owl to a less-than-significant level.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require implementation of mitigation measure BIO-1a from the Master Plan EIR.

Mitigation Measures (Sites 4, 5, 6, 7, 9, 10, 12, 13, 15)

BIO-2 Burrowing Owl (Housing Sites 4, 5, 6, 7, 9, 10, 12, 13, 15). To avoid loss of or harm to burrowing owl, the following measures shall be implemented by housing project developers:

a. Prior to issuance of a grading permit for housing sites 4, 5, 6, 7, 9, 10, 12, 13, or 15, the applicant shall retain a biologist qualified in ornithology to conduct a burrowing owl habitat assessment per Appendix C of the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). If burrowing owl habitat is not found, a letter report confirming absence shall be prepared and submitted to the City of Patterson Community Development Department and no further measures are required.

b. If potential habitat is found, surveys shall be conducted the season prior to construction. Surveys shall be conducted according to the methods for take avoidance described in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). Per the guidelines, three or more survey visits during daylight hours at least three weeks apart during the peak of the breeding season (April 15 April and July 15) shall occur. If no burrowing owls are found, a letter report confirming absence shall be prepared and submitted to the City of Patterson Community Development Department and no further measures are required.

c. If burrowing owls are detected during surveys, seasonal no-disturbance buffers, as outlined in the *Burrowing Owl Survey Protocol and Mitigation Guidelines* (CBOC 1993) and the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012), shall be in place around occupied habitat prior to and during any ground disturbance activities. The following table includes buffer areas based on the time of year and level of disturbance (CDFW 2012), unless a qualified biologist approved by the California Department of Fish and Wildlife verifies through non-invasive measures that either: 1) birds have not begun egg laying and incubation; or 2) that juveniles from the occupied burrows are foraging independently and are capable of independent survival.

Location	**Time of Year**	**Level of Disturbance Buffers (meters)**		
		Low	**Med**	**High**
Nesting Sites	April 1 – Aug 15	200 m	500 m	500 m
Nesting Sites	Aug 16 – Oct 15	200 m	200 m	500 m
Nesting Sites	Oct 16 – Mar 31	50 m	100 m	500 m

d. If burrowing owl is found and avoidance is not possible, consultation with the California Department of Fish and Wildlife to discuss how to implement the project and avoid take shall occur. If take cannot be avoided, take authorization through the acquisition of an Incidental Take Permit would be occur.

e. If surveys locate occupied burrows in or near construction areas, consultation with the California Department of Fish and Wildlife shall occur to interpret survey results and develop a project-specific avoidance and minimization approach. Once the absence of burrowing owl has been confirmed, a letter report shall be prepared and submitted to the City of Patterson Community Development Department.

BIO-3 Worker Environmental Awareness Training. Prior to approval of a grading permit for undeveloped housing sites (e.g. 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 15), a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of special-status species potentially occurring in the housing site vicinity, including, but not limited to, burrowing owl, California horned lark, Crotch's bumble bee, San Joaquin kit fox, Swainson's hawk, hoary bat, pallid bat, Townsend's big-eared bat, western red bat, and protected nesting birds. Their habitats, general measures that are being implemented to conserve species as they relate to the housing site, and the boundaries within which construction activities will occur will be explained. Informational handouts with photographs clearly illustrating the species' appearances shall be used in the training session. All new construction personnel shall undergo this mandatory environmental awareness training. Documentation of completion of this training shall be submitted to the City of Patterson Community Development Department prior to the start of ground disturbing activities.

Implementation of these mitigation measures would reduce the potential, significant impact to burrowing owl to a less-than-significant level by requiring pre-construction training and surveys for active nests/burrows and the implementation of avoidance, minimization, and mitigation measures should they be found on the housing site.

San Joaquin Kit Fox. The San Joaquin kit fox is a federally-listed endangered species and a state-listed threatened species. The present range of the San Joaquin kit fox extends from the southern end of the San Joaquin Valley, north to Tulare County, and along the interior Coast Range valleys and foothills to central Contra Costa County. San Joaquin kit foxes typically inhabit annual grasslands or grassy open spaces with scattered shrubby vegetation but can also be found in some agricultural habitats and urban areas. This species needs loose-textured sandy soils for burrowing, and they also need areas that provide a suitable prey base, including black-tailed hare, desert cottontails, and California ground squirrels, as well as birds, reptiles, and carrion.

According to the CDFW, kit foxes have become established in urban settings of the Central Valley, such as Bakersfield, Taft, and Coalinga (Harrison et. al 2011). When kit foxes have easy access to trash and pet food, they often lose fear of people and urban environments. Potential ruderal and farmland habitat on or adjacent to the City's undeveloped peripheral housing sites (e.g. Sites 4, 6, 7, 10, 11, 12, 13, 15, 16). Four observations of this species have been documented approximately three to six miles to the west of Patterson (Occurrence Nos. 560, 80, 206, 548 CNDDB 2025b).

The likelihood of this species occurring on the proposed housing sites is considered low. However, kit fox can use marginal habitat within undeveloped annual grassland and farmland. Loss of or harm to individual kit foxes could result if they are present on a housing site and seek shelter during construction within artificial structures, such as stored pipes or exposed trenches. Loss or harm to San Joaquin kit fox is considered a significant adverse impact.

Implementation of Mitigation Measure BIO-3, presented earlier, which requires a training session on special-status species potentially present on a housing construction site for all personnel and the following mitigation measure would reduce potential, significant impacts to San Joaquin kit fox to a less-than-significant level.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require implementation of mitigation measure BIO-1c from the Master Plan EIR.

Mitigation Measure (Sites 4, 6, 7, 10, 11, 12, 13, 15, 16)

BIO-4 San Joaquin Kit Fox (Housing Sites 4, 6, 7, 10, 11, 12, 13, 15, 16). Applicants shall implement U.S. Fish and Wildlife Service *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance* (USFWS 2011) prior to initiation of and during any construction activity on housing sites 4, 6, 7, 10, 11, 12, 13, 15, or 16 to avoid unintended take of individual San Joaquin kit foxes.

Preconstruction/pre-activity surveys for San Joaquin kit fox shall be conducted no less than 30 days prior to the beginning of ground disturbance and/or construction activities or any project activity that may impact San Joaquin kit fox. The surveys shall include all work areas and a minimum 200-foot buffer of the construction site. The preconstruction surveys shall identify kit fox habitat features on the housing site, evaluate use by kit fox and, if possible, assess the potential impacts of the proposed activity. The status of all dens shall be determined and mapped.

If a natal/pupping den is discovered at a housing opportunity site or within 200 feet of the site, the applicant shall consult with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service to establish an appropriate avoidance buffer. The avoidance buffer shall be maintained until such time as the burrow is no longer active and/or an incidental take permit is determined to be required and is obtained. If an avoidance buffer is not feasible, consultation with

the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service shall be conducted to determine how to avoid take. If take cannon be avoided, Incidental Take Permits shall be obtained.

In addition, the following measures shall be observed:

a. Project-related vehicles shall observe a 20-mph speed limit in all project areas; this is particularly important at night when kit foxes are most active. To the extent possible, night-time construction shall be minimized. Off-road traffic outside of designated project area shall be prohibited.

b. To prevent inadvertent entrapment of kit foxes or other animals during the construction phase of any project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals. If at any time a trapped or injured kit fox is discovered, the procedures under number 11 of the Construction and Operational Requirements in the Standardized Recommendations must be followed.

c. Kit foxes are attracted to den-like structures such as pipes and may enter stored pipe becoming trapped or injured. All construction pipes, culverts, or similar structures with a diameter of four inches or greater that are stored at a construction site for one or more overnight periods shall be thoroughly inspected for kit foxes before the pipe is subsequently buried, capped, or otherwise used or moved in any way. If a kit fox is discovered inside a pipe, that section of pipe shall not be moved until the U.S. Fish and Wildlife Service has been consulted. If necessary, and under the direct supervision of the biologist, the pipe may be moved once to remove it from the path of construction activity, until the fox has escaped.

d. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in closed containers and removed at least once a week from a construction or housing site.

e. No firearms shall be allowed on the housing site during construction activities.

f. To prevent harassment, mortality of kit foxes or destruction of dens by dogs or cats, no pets shall be permitted on site during construction activities.

g. Use of rodenticides and herbicides on the housing site during construction shall be restricted. This is necessary to prevent primary or secondary poisoning of kit foxes and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and Federal

legislation, as well as additional project-related restrictions deemed necessary by the U.S. Fish and Wildlife Service. If rodent control must be conducted, zinc phosphide shall be used because of proven lower risk to kit fox.

h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.

i. Any contractor, employee, or agency personnel who inadvertently kills or injures a San Joaquin kit fox shall immediately report the incident to the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

j. The applicant shall submit weekly reports on construction monitoring activities to the City of Patterson Community Development Department. An occupancy permit shall not be issued without receipt of the weekly reports.

Implementation of this mitigation measure would reduce the potential significant impact to San Joaquin kit fox to a less-than-significant level by requiring pre-construction surveys for kit fox and the implementation of avoidance, minimization, and mitigation measures should they be found on the housing site.

Swainson's Hawk. Swainson's hawk is a state-listed threatened species. Swainson's hawk is a long-distance migrator. Their nesting grounds occur in northwestern Canada, the western U.S., and Mexico and most populations migrate to wintering grounds in the open pampas and agricultural areas of South America (Argentina, Uruguay, southern Brazil). This round-trip journey may exceed 14,000 miles. The birds return to the nesting grounds and establish nesting territories in early March.

Swainson's hawk nests in the Central Valley of California are generally found in scattered trees or along riparian systems adjacent to agricultural fields or pastures. These open fields and pastures are their primary foraging areas. Suitable foraging habitat for Swainson's hawk is found in the open agricultural fields in or adjacent to the City, including housing sites 1A, 1B, 2, 4, 6, 7, 10, 11, 12, 13, 15, or 16. Ten observations of this species have been recorded within nine miles of Patterson (Observation nos. 2498, 2524, 482, 483, 479, 740, 481, 480, 48, and 462, CNDDB 2025b). Observation number 2498 was recorded in 2006 from within the city limits at a location within an orchard, however the nest tree is thought to have been removed.

Construction activities at the housing sites could result in the disturbance of nesting sites occupied by Swainson's hawk on or adjacent to the housing site, if present. The change in land use from agricultural or undeveloped annual grassland to developed uses would cause a loss of Swainson's hawk foraging habitat at the housing site. Loss or harm to Swainson's hawk or its foraging habitat is considered a significant adverse impact. The California Department of Fish and Game's (now California Department of Fish and Wildlife) *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks in the Central Valley of California* (CDFG 1994) provides guidance on how impacts on Swainson's hawk are to be mitigated. Implementation of Mitigation Measure BIO-3, presented earlier, which

requires a training session on special-status species potentially present on a housing construction site for all personnel and the following mitigation measures would reduce potential, significant impacts to Swainson's hawk to a less-than-significant level.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require implementation of mitigation measure BIO-1b from the Master Plan EIR.

Mitigation Measures (Sites 4, 6, 7, 10, 11, 12, 13, 15, 16)

BIO-5 Swainson's Hawk (Housing 4, 6, 7, 10, 11, 12, 13, 15, 16). For development proposed on the undeveloped housing sites (e.g. Sites 4, 6, 7, 10, 11, 12, 13, 15, or 16), the applicant shall implement the following measures to avoid loss of or harm to Swainson's hawk and other raptors:

a. Tree and vegetation removal shall be completed during the nonbreeding season for raptors (September 16–January 31).

b. To avoid, minimize, and mitigate potential impacts on Swainson's hawk and other raptors nesting on or adjacent to the housing site, the project applicant shall retain a qualified biologist to conduct preconstruction surveys and identify active nests on and within 0.5 mile of the housing site for construction activities conducted during the breeding season (February 1–September 15).. Guidelines, provided in *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in the Central Valley* (Swainson's Hawk Technical Advisory Committee 2000) or updated, current guidance, shall be followed for surveys for Swainson's hawk. In accordance with the current guidelines, surveys shall occur within a 0.5-mile radius of the site, and shall involve a minimum of two survey periods. If no nests are found, a report documenting the results of the survey shall be submitted to the City of Patterson Community Development Department and no further mitigation will be required.

c. Impacts on nesting Swainson's hawks and other raptors shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction raptor surveys. No project activity shall commence within the buffer areas until a qualified biologist has determined, in coordination with California Department of Fish and Wildlife, the young have fledged, the nest is no longer active, or reducing the buffer would not result in nest abandonment. California Department of Fish and Wildlife guidelines recommend implementation of 0.25- or 0.5-mile-wide buffers for Swainson's hawk nests, but the size of the buffer may be decreased if a qualified biologist, in consultation with California Department of Fish and Wildlife, determine that such an adjustment would not be likely to adversely affect the nest.

The appropriate no-disturbance buffer for other raptor nests (i.e., species other than Swainson's hawk) shall be determined by a qualified biologist based on site-specific conditions, the species of nesting bird, nature of the project activity, visibility of the disturbance from the nest site, and other relevant circumstances.

Monitoring of all active raptor nests by a qualified biologist during construction activities will be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer will remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist.

If an avoidance buffer is not feasible, consultation with the California Department of Fish and Wildlife shall be conducted to determine how to avoid take. If take cannon be avoided, Incidental Take Permits shall be obtained.

BIO-6 If foraging habitat is present within a housing site and there is an active nest within ten miles, the following measures shall be implemented to mitigate for the loss of Swainson's hawk foraging habitat:

a. Prior to ground-disturbing activities, suitable Swainson's hawk foraging habitat shall be preserved to ensure replacement of foraging habitat lost as a result of the project, as determined by a qualified biologist, in consultation with California Department of Fish and Wildlife.

b. The habitat value shall be based on Swainson's hawk nesting distribution and an assessment of habitat quality, availability, and use within Stanislaus County. The mitigation ratio shall be consistent with the guidelines included in the *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California* (CDFG 1994). These guidelines specify that the mitigation ratio shall be 1:1 if there is an active nest within one mile of the housing site, 0.75:1 if there is an active nest within five miles but greater than one mile away, and 0.5:1 if there is an active nest within 10 miles but greater than five miles away. If there is an active nest within one mile of the housing site, the mitigation ratio can be reduced to 0.5:1 if all of the mitigation land can be actively managed for prey production. Such mitigation shall be accomplished through either the transfer of fee title or perpetual conservation easement. The mitigation land shall be located within the known foraging area within Stanislaus County.

If required, pre-construction Swainson's hawk surveys may be required to identify additional nests within ten miles of the housing site. If additional nests are observed, foraging habitat shall be preserved following the mitigation ratios outlined above.

Implementation of these mitigation measures would reduce the potential significant impact to Swainson's hawk to a less-than-significant level by requiring foraging habitat mitigation and pre-construction surveys for Swainson's hawk nests on or near the housing site.

Crotch's Bumble Bee. On June 12, 2019, the California Fish and Game Commission voted to accept a petition to consider listing four subspecies of bumble bee, including the Crotch's bumble bee, under the California Environmental Species Act. As a result of this decision, Crotch's bumble bee is a state candidate endangered species and is temporarily afforded the same protection as state-listed threatened or endangered species. Crotch's bumble bee range historically extended throughout the southern two-thirds of California, from coastal California east to the Sierra-Cascade crest and south into Mexico; however, recent data indicates that this species is absent from the center of its historical range due to extensive agricultural intensification and urbanization (Xerces Society 2018).

Crotch's bumble bees inhabit open grassland and scrub habitats. Suitable bee habitat is based on the availability of flowers on which to forage throughout the duration of the colony (spring through fall), colony nest sites, and overwintering sites for the queens (Xerces Society 2018). Bumble bees are generalist foragers (i.e., they do not depend on any one flower type). Documented food plants for Crotch's bumble bees include *Asclepias* sp., *Chaenactis* sp., *Lupinus* sp., *Medicago* sp., *Phacelia* sp., and *Salvia* sp. (Xerces Society 2018). Crotch's bumble bees, like most bumble bee species, nest underground, particularly within abandoned rodent holes (Xerces Society 2009). The flight period for Crotch's bumble bee queens is from late February to late October, peaking in early April and again in July. The flight period for workers and males extends between late March and September (Xerces Society 2018).

Observations of Crotch's bumble bee from within the project vicinity include a historic (1949) record from Patterson (Occurrence No, 28, CDFW 2025b). Potential ruderal and farmland habitats occur on or adjacent to the City's undeveloped peripheral housing sites (e.g. Sites 4, 6, 7, 10, 11, 12, 13, 15, 16). These habitats provide low quality foraging and nesting habitat for Crotch's bumble bee. If present, grading and construction activities could result in in loss or harm to Crotch's bumble bee, which is considered a significant adverse impact. Implementation of Mitigation Measure BIO-3 and the following mitigation measure would reduce the potential impact to Crotch's bumble bee to a less-than-significant level.

Mitigation Measure (Sites 4, 6, 7, 10, 11, 12, 13, 15, 16)

BIO-7 If Crotch's bumble bee is listed prior to project implementation., a qualified biologist shall conduct a habitat assessment at housing sites 4, 6, 7, 10, 11, 12, 13, 15, or 16 to determine if the project site and the immediate surrounding vicinity contain habitat suitable to support Crotch's bumble bee. Potential nesting sites, which include all small mammal

burrows, perennial bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs would need to be documented as part of the assessment per the guidelines in the Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species (CDFW 2023).

If potential habitat is identified, one of the following options shall be implemented prior to vegetation removal.

Option 1: Seasonal Avoidance

Clear vegetation and conduct ground-disturbing activities October to February, outside of the colony active period (March through September) to avoid peak flight season and discourage Crotch's bumble bees from nesting in the project area.

Option 2: Assume Presence of Crotch's Bumble Bee

Assume presence and obtain Incidental Take Authorization from the California Department of Fish and Game (Section 2081 of the Fish and Game Code. Avoidance measures identified in the permit shall be implemented. Compensatory mitigation, such as land acquisition and habitat restoration or enhancement would be required.

Option 3: Conduct Focused Surveys for Crotch's Bumble Bee

If seasonal avoidance is not possible, consultation with the California Department of Fish and Wildlife shall occur at least one year prior to ground disturbance to evaluate potential impacts and other feasible avoidance measures, including habitat assessments and/or surveys.

Surveys shall occur during the colony active period for the Crotch's bumblebee (March through August) prior to vegetation clearance, grading, or the initiation of any construction activity in any undeveloped area of the project site, developers of future individual projects shall hire a qualified biologist to conduct a pre-construction survey of small mammal burrows and thatched/bunch grasses. If the survey results are negative (i.e., no Crotch's bumble bee activity observed), a letter report confirming absence shall be prepared and submitted to the City of Patterson Community Development Department, and no further mitigation is required.

If Crotch's bumble bee nests are detected and the area can be avoided, a qualified biologist shall supervise the installation of protective fencing/flagging a minimum of 50 feet around the nest area prior to construction and phase vegetation removal, to retain patches of floral resources during construction. The fencing/flagging shall be checked at least once per week by a biological monitor until construction is complete to ensure that the protective fencing/flagging remains intact. The qualified biologist can conduct the weekly checks or train a biological monitor selected from the construction crew by the construction contractor (typically the project foreman) to check the fencing/flagging and provide weekly updates. Documentation of the fencing/flagging installation shall be provided to the City of Patterson Community Development Department prior to the start of ground disturbance

activities. Documentation of the weekly checks and timely maintenance of fencing/flagging (if needed) shall be provided to the City of Patterson Community Development Department quarterly during construction.

If Crotch's bumble bee nests are detected and the area cannot be avoided, the qualified biologist shall coordinate with the California Department of Fish and Wildlife to obtain Incidental Take Authorization. Compensatory mitigation, such as land acquisition and habitat restoration or enhancement would be required.

After it has been confirmed that the habitat area is no longer occupied, a letter report shall be prepared and submitted to the City of Patterson Community Development Department. The project applicant shall be responsible for implementation of this mitigation measure with oversight by the City of Patterson Community Development Department.

Special-Status Bats. Trees in the project area and/or buildings or structures on or adjacent to housing sites could provide roosting habitat for special-status bat species known to occur in the vicinity of the housing sites: hoary bat, pallid bat, Townsend's big-eared bat, and western red bat. These bat species inhabit a wide variety of habitats including grasslands, woodlands, and forests. Some species prefer to roost in dense foliage of medium to large trees; others within abandoned or little-used structures. Construction activities at a housing site could result in the disturbance of roost and natal sites occupied by special-status bats on or adjacent to the housing site, if present.

Loss or harm to special-status bats is considered a significant, adverse impact. Implementation of Mitigation Measure BIO-3, presented earlier, which requires a training session on special-status species potentially present on a housing construction site for all personnel and the following mitigation measure would reduce potential, significant impacts to special-status bats to a less-than-significant level.

Mitigation Measure (Sites 3 – 14)

BIO-8 Special-Status Bats. Project developers of sites 3 - 14 shall implement the following measures to avoid loss of or harm to special-status bat species on any housing site:

a. Within 14 days prior to tree removal or construction activities, a qualified biologist shall conduct a habitat assessment for bats and potential roosting sites in trees to be removed and in trees or building exteriors within 50 feet of any project construction. These surveys shall include a visual inspection of potential roosting features (bats need not be present) and a search for presence of guano within the housing site, construction access routes, and 50 feet around these areas. Cavities, crevices, exfoliating bark, and bark fissures that could provide suitable potential nest or roost habitat for bats shall be surveyed. Assumptions can be made on what species is present due to observed visual characteristics along with habitat use, or the bats can be identified to the species level with the use of a bat echolocation detector such as an "Anabat" unit. Potential roosting features found during the survey shall be flagged or marked.

b. If no signs of roosting sites or bats are found, a letter report confirming absence shall be prepared and submitted to the City of Patterson Community Development Department and no further mitigation is required.

c. If bats or roosting sites are found, bats shall not be disturbed without specific notice to and consultation with California Department of Fish and Wildlife. Any focused surveys shall be conducted within one 24-hour period during dusk emergence and pre-dawn re-entry.

d. If bats are found roosting outside of the nursery season (May 1 through October 1), California Department of Fish and Wildlife shall be consulted prior to any eviction or other action. If avoidance or postponement is not feasible, a Bat Eviction Plan will be submitted to California Department of Fish and Wildlife for written approval prior to project implementation. A request to evict bats from a roost includes details for excluding bats from the roost site and monitoring to ensure that all bats have exited the roost prior to the start of activity and are unable to re-enter the roost until activity is completed. Any bat eviction shall be timed to avoid lactation and young-rearing. If bats are found roosting during the nursery season, they shall be monitored to determine if the roost site is a maternal roost. This could occur by either visual inspection of the roost bat pups, if possible, or by monitoring the roost after the adults leave for the night to listen for bat pups. Because bat pups cannot leave the roost until they are mature enough, eviction of a maternal roost cannot occur during the nursery season. Therefore, if a maternal roost is present, a 50-foot buffer zone (or different size if determined in consultation with the California Department of Fish and Wildlife) shall be established around the roosting site within which no construction activities including tree removal or structure disturbance shall occur until after the nursery season.

Implementation of this mitigation measure would reduce the potential significant impact to special-status bat species to a less-than-significant level by requiring pre-construction surveys for bats and potential roosting sites and, if found, avoiding any disturbance.

Nesting Birds. Protected nesting bird species, such as California horned lark, and raptor species, such as white-tailed kite, have the potential to nest in buildings or structures, on open ground, or in any type of vegetation, including trees, during the nesting bird season (January 15 through September 15). The housing sites and surrounding areas contain a variety of trees, shrubs, and open grassland areas suitable for nesting. Construction activities, including ground disturbance, can impact nesting birds protected under the federal Migratory Bird Treaty Act and California Fish and Game Code, should nesting birds be present during construction. If protected bird species are nesting adjacent to a housing site during the bird nesting season, then noise-generating construction activities could result in the loss of fertile eggs, nestlings, or otherwise lead to the abandonment of nests. Implementation of Mitigation Measure BIO-3, presented earlier, which requires a

training session on special-status species potentially present on a housing construction site for all personnel and the following mitigation measure would reduce the potential impact to nesting birds, including California horned lark, to a less-than-significant level.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require implementation of mitigation measure BIO-1a from the Master Plan EIR.

Mitigation Measure (Sites 3 – 14)

BIO-9 Nesting Birds and Raptors. To avoid impacts to raptors and other nesting birds during the nesting season (January 15 through September 15), all construction activities on housing sites 3 - 14 should be conducted between September 16 and January 14, which is outside of the bird nesting season. If construction or project-related work is scheduled to begin during the nesting season (February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist shall conduct nesting bird surveys.

a. Two surveys for active bird nests will occur within 10 days prior to start of construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding each work area are typically 250 feet for passerines, 500 feet for smaller raptors, and 1,000 feet for larger raptors. Surveys will be conducted at the appropriate times of day to observe nesting activities. Locations off the site to which access is not available may be surveyed from within the site or from public areas. If no nesting birds are found, a letter report confirming absence will be prepared and submitted to the City of Patterson Community Development Department and no further mitigation is required.

b. If the qualified biologist documents active nests within the housing site or in nearby surrounding areas, an appropriate buffer between each nest and active construction shall be established. The buffer shall be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist shall conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist shall monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman shall have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Once the absence of nesting birds has been confirmed, a letter report will be prepared and submitted to the City of Patterson Community Development Department.

Implementation of this mitigation measure would reduce the potential significant impact to nesting birds to a less-than-significant level by requiring pre-construction surveys for active bird nests and the implementation of avoidance, minimization, and mitigation measures should they be found on the housing site.

b. **Riparian Habitat or Sensitive Natural Communities**. A review of aerial photographs and the NWI online database was conducted to identify potential riparian habitat or sensitive natural communities on or adjacent to housing opportunity sites (USFWS 2025b). Results showed that no riparian habitat or sensitive natural communities are located on or adjacent to housing opportunity sites. Therefore, development of a housing site would not have a substantial adverse effect on any riparian habitat or other sensitive natural communities.

c. **Protected Wetlands/Waters.** A review of aerial photographs and the NWI online database was conducted to identify potentially jurisdictional aquatic features on or adjacent to housing opportunity sites (USFWS 2025b). There are no natural wetlands or waters mapped within the vicinity of the housing sites, however agricultural drainages and ponds are mapped within housing site11.

Drainage channels are defined by their ordinary high-water mark and/or top of bank and their connection to other waterways or aquatic features. Drainage channels may also feed into the City's stormwater system, which may have connectivity to tributaries or natural streams. Therefore, development of a housing site could potentially have a substantial adverse effect on state or federally protected wetlands.

Drainage channels may be subject to USACE jurisdiction under the Clean Water Act, as well as by the Central Valley Regional Water Quality Control Board or California Department of Fish and Wildlife.

Project development of a housing site could result in the loss of jurisdictional wetlands and waters. Loss of wetlands is considered a significant adverse impact. Implementation of the following mitigation measure would reduce the potential impact to wetlands and other waters of the U.S. to a less-than-significant level.

Mitigation Measure

BIO-10 Prior to initiation of ground disturbance or construction at housing site 11, applicants shall retain a qualified biologist to determine the extent of potential wetlands and waterways regulated by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW).

If the USACE claims jurisdiction, the applicant shall obtain a Clean Water Act Section 404 Nationwide Permit. If the impacts to the drainage features do not qualify for a Nationwide Permit, the applicant will proceed in obtaining an Individual Permit from the USACE. The applicant will then coordinate with the

RWQCB to obtain a Clean Water Act Section 401 Water Quality Certification. If necessary, the applicant will coordinate with the CDFW to obtain a Streambed Alteration Agreement.

To compensate for temporary and/or permanent impacts to Waters of the U.S. that would be impacted as a result of the proposed project, mitigation shall be provided as required by the regulatory permits. Mitigation would be provided through one of the following mechanisms:

a. A Wetland Mitigation and Monitoring Plan shall be developed that outlines mitigation and monitoring obligations for temporary impacts to wetlands and other waters as a result of construction activities. The Wetland Mitigation and Monitoring Plan would include thresholds of success, monitoring and reporting requirements, and site-specific plans to compensate for wetland losses resulting from the project. The Wetland Mitigation and Monitoring Plan shall be submitted to the appropriate regulatory agencies for review and approval during the permit application process.

b. To compensate for permanent impacts, the purchase and/or dedication of land to provide suitable wetland restoration or creation shall ensure a no net loss of wetland values or functions. If restoration is available and feasible, a minimum 1:1 impact to mitigation ratio would apply to projects for which mitigation is provided in advance.

For improvements on the housing site, the applicant shall comply with terms and conditions of the permits, including measures to protect and maintain water quality, restore work sites, and mitigation to offset temporary and/or permanent wetland impacts. applicant shall be responsible for implementation of this mitigation measure prior to issuance of a grading permit.

Implementation of this mitigation measure shall ensure that impacts to potentially jurisdictional wetlands and waterways within the housing site boundary are mitigated to a less-than-significant level by requiring a wetland assessment/jurisdictional determination and associated permitting.

d. **Wildlife Movement**. The *California Essential Habitat Connectivity Project* provides a statewide wildlife habitat connectivity map using the California Department of Fish and Wildlife's Biogeographic Information and Observation System (CDFW 2025d). This system was queried to determine the presence or absence of wildlife corridors on or adjacent to housing opportunity sites.

Results showed that there are no Essential Habitat Connectivity Areas or wildlife corridors located on or adjacent to the housing opportunity sites. Therefore, development of a housing site would not interfere substantially with the movement of wildlife.

e. **Local Biological Resource Policies/Ordinances.**

City of Patterson 2010 General Plan. The general plan is a comprehensive statement of the planning goals and policies for the City. The general plan has goals in place for conserving local biological resources. The Natural Resources Element provides direction regarding the conservation, development, and use of natural resources in and around Patterson, including agricultural land, water quality, vegetation and wildlife, and air quality.

City of Patterson Code of Ordinances (Trees). Chapter 12.16.110 of the Code of Ordinances, Trees, contains ordinances for building construction necessitating altering or removing a street tree. A permit and deposit are required. When the erection, repair, alteration or removal of any building, house or structure necessitates the trimming, pruning, or removal of any street tree, such trimming, pruning or removal shall be done only after written permit issued by the director and at the expense of the applicant. As a condition to granting a permit, under this section, for the removal of a tree, the director shall collect a deposit from the applicant sufficient to defray the cost of replacing the removed tree with an approved tree in conformance with the street tree plan.

According to Ordinance 18.78.050(C), Tree removal and replacement, tree removal shall be limited to trees which are in poor health, structurally distressed, or unsafe. The removal of a tree shall be the final recourse upon determining that it is infeasible to save the tree by any other method (e.g., pruning, treatment of diseases, fertilizing). Prior to the removal of any tree, planning director approval is required. The following information shall be required:

1. A written statement of the health and condition of the trees to be removed by a certified arborist;

2. Reasons for removal; and

3. Landscape plan indicating size, quantity, species, and location of the trees to be removed and replaced.

Removal of regulated trees is considered a significant impact. The following mitigation measure is considered standard to construction compliance, and would comply with the City of Patterson's Code of Ordinances, ensuring compliance with applicable laws related to the protection of regulated trees.

Mitigation Measure (Sites 3 – 14)

BIO-11 Regulated Trees. If regulated trees will be impacted by a proposed housing project on sites 3 - 14, the applicant shall retain an arborist to prepare a written statement of the health and condition of the trees to be removed, reasons for removal, and identify the size, quantity, species, and location of the trees to be removed and replaced. If needed, a tree removal permit shall be obtained from the City of Patterson Planning Director.

f. **Conservation Plans**. There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the proposed housing site locations and no conflict with any conservation plan is anticipated.

5. CULTURAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Cause a substantial adverse change in the significance of a *historical resource* pursuant to section 15064.5?	☐	☒	☐	☐
b.	Cause a substantial adverse change in the significance of a *unique archaeological resource* pursuant to section 15064.5?	☐	☒	☐	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Comments:

a-b. **Historical and Unique Archaeological Resources.** An archival database search was conducted through Central California Information Center (CClC), of the California Historical Resources Information System (CHRIS) affiliated with the State of California Office of Historic Preservation in Sacramento. The CCIC was provided with a location map and coordinates of the city limits, with a request of the archaeological and non-archaeological resources within one-quarter mile radius of the city limits. There are 15 resources located within the city limits and two within a quarter mile.

Historic Structure Sites

P-50-000001 San Joaquin Valley Railroad; Southern Pacific Railroad line; Oakdale Branch Line, 2743-01.

P-50-000300, historic farm equipment.

P-50-000540, Patterson Branch Library, Carnegie Professional Center.

P-50-001718, Las Palmas Avenue Palm Tree Lined Area.

P-50-001722, Del Puerto Hotel.

P-50-001723, Plaza Center Building; Plaza Building; Patterson Ranch Co. Office Building.

P-50-001724, bridge.

P-50-001903, aqueduct.

P-50-001904, Delta Mendota Canal. This site has been determined eligible for NRHP.

P-50-001924, Patterson Irrigation District North Lateral No. 4.

P-50-001964, Mahaffey Residence.

P-50-001965, Del Puerto Forest Fire Station. The original building has been demolished. A new Cal Fire Station has been built on the site.

P-50-002094, historic ditch.

P-50-002179, Patterson Lift Irrigation System. It is noted that not all individual elements have been surveyed or recorded.

P-50-002208, Patterson Irrigation District Lateral M. This is an element of the Patterson Lift Irrigation System.

P-50-002336, Reimer & Lanfranki Medical Buildings, 55-59 North Salado Avenue.

Indigenous Site

P-50-000007 Worked chert flake, single occurrence. The flake was located on a dirt road in the Standard Gas Company Right of Way on October 25, 1985. Housing Opportunity Sites 12-14 are the closest sites to P-50-000007. However, Housing Opportunity Site 14 is approximately half a mile from the chert flake and Sites 12 and 13 are slightly more northerly. There is a possibility for previously undiscovered historical archaeological resources and indigenous cultural resources to be encountered during construction activities. With implementation of the following mitigation measures, this potential impact would be less than significant.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable cultural resources mitigation measures in the Master Plan EIR.

Mitigation Measure (Sites 3-14)

CR-1 If archaeological resources are discovered during construction, work shall be halted at a minimum of 100 feet from the find and the area shall be staked off. The project developer shall notify a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented.

c. **Native American Human Remains.** Although there are no formal cemeteries or Native American burial grounds known to exist at any of the housing opportunity sites, there is a potential that construction activities could accidentally uncover human remains due to the stable and dry land within the project area. Disturbance of Native American skeletal remains during construction activities would be a significant, adverse environmental impact. However, implementation of the following mitigation measure would ensure potential impacts are less than significant.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable cultural resources mitigation measures in the Master Plan EIR.

Mitigation Measure (Sites 3-14)

CR-2 California Health and Safety Code Section 7050.5 and the CEQA Guidelines Section 15064.5(e) contain the mandated procedures of conduct following the discovery of human remains. According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Stanislaus County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours, who would, in turn, notify the person the Native American Heritage Commission identifies as the Most Likely Descendant of any human remains. Further actions shall be determined, in part, by the desires of the Most Likely Descendant. The Most Likely Descendant has 48 hours to make recommendations regarding the disposition of the remains following notification from the Native American Heritage Commission of the discovery. If the Most Likely Descendant does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the Most Likely Descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission.

6. ENERGY

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Comments:

a. The threshold of significance energy consumption is qualitative. That is, the terms "wasteful", "inefficient", and "unnecessary" are not quantified in CEQA. Consequently, a determination of whether a project would consume energy resources that can be characterized as wasteful, inefficiency or unnecessary would subjective. For this reason, energy effects of implementing the Housing Element are discussed qualitatively based on review of projected energy demand, state and local building and transportation regulations that affect energy demand from new development, and mitigation measures in this initial study that would function to reduce energy demand.

Projected Energy Demand

The primary sources of energy consumption from constructing and operating new residential development would be fuel use in vehicles traveling to and from individual housing development sites, and building energy demand in the form of electricity and potentially natural gas. Each of these energy demand sources is described below solely as a basis for understanding the scale of potential energy demand from buildout of the Housing Element opportunity sites.

Transportation Fuel Demand. The project would generate new vehicle trips and an associated increase in vehicle miles traveled by those trips. Transportation fuel demand would correspondingly increase as a result. Table 2 in the *City of Patterson Housing Element—Vehicle Miles Traveled (VMT) Impact Assessment Memorandum* in Appendix E reports that citywide VMT would increase by approximately 304,000 per day in 2031 with buildout of the Housing Element. The California Air Resources Board's 2025 Emissions Factor Model is a tool that can be used to identify VMT/day in any county in the state. For 2025, the model estimates daily countywide VMT at about 14,375,000. At buildout, the Housing Element VMT would constitute approximately two percent of 2025 countywide VMT and a lower percentage of countywide VMT in 2031 assuming that growth also occurs in other parts of the county before 2031. This change illustrates the nominal increase in countywide transportation fuel demand that would occur with the project.

Refer to Section 8, Greenhouse Gas Emissions, and Section 17, Transportation, of this initial study for additional information on project VMT.

Electricity. The California Energy Commission Energy Consumption Data Management System reports that in 2024, total electricity consumption in Stanislaus County was 5,200,000,000 kilowatt-hours (kWh). Table 5.11. Operational Energy Consumption – Electricity, in the CalEEMod results included in Appendix C, shows that projected annual electricity demand from the project, would be 33,409,007 kWh. This is based on assumptions in CalEEMod about current regulatory requirements regarding building energy efficiency for new residential construction. Those requirements are likely to become more stringent over time such that electricity demand at buildout of the Housing Element update could be lower than reported here.

The project demand would be equivalent to less than 0.01 percent of the countywide 2024 electricity demand and a lesser percentage of future 2031 countywide demand were the total Housing Element update residential building capacity to be constructed by 2031.

Natural Gas. According to the California Energy Commission Energy Consumption Data Management System, in 2024, total natural gas consumption in Stanislaus County was 194,100,000 therms. Table 5.11. Operational Energy Consumption – Natural Gas, in the CalEEMod results included in Appendix C shows that projected natural gas demand from the project would be about 114,061,868,000 BTU per year or approximately 1,140,618 therms per year. This would represent or 0.01 percent of the countywide demand in 2024 and a lesser percentage of future 2031 countywide demand were the total Housing Element residential building capacity to be constructed by 2031.

As described in Section 8, Greenhouse Gas Emissions, the threshold of significance for evaluating GHG impacts includes a design standard that all future residential development under the Housing Element avoid use of natural gas as an energy source. Mitigation included in that section specifically prohibits use of natural gas consistent with the design standard. Therefore, in fact, natural gas use would likely be eliminated. The threshold of significance design standard is intended to help meet the state's 2045 net zero GHG emissions target as described in the discussion of applicable regulatory measures included in the air quality/GHG analysis in Appendix C.

Regulatory Requirements

A multitude of state regulations and legislative acts are aimed at improving vehicle fuel efficiency, building energy efficiency, and energy conservation. Many of these regulations have air quality and GHG emissions reduction co-benefits. The air quality/GHG analysis in Appendix C includes a summary of a number of key associated regulations and legislation. Examples of transportation-based regulations that would reduce transportation consumption and/or improve fuel efficiency include the Pavley I standards, focus on transportation fuel efficiency, Advanced Clean Cars II legislation, which requires increased commercialization of electric vehicles. Vehicle miles traveled are

expected to decline with the continuing implementation of Senate Bill 743, resulting in less vehicle travel and less transportation fuel consumption. Implementing these types of regulations is generally not within the control of individual project developers.

In the renewable energy use sector, representative legislation for the use of renewable energy includes, but is not limited to, Senate Bill 350 and Executive Order B-16-12.

In the building energy use sector, representative legislation and standards for reducing natural gas and electricity consumption include, but are not limited to, Assembly Bill 2021, the California Building Standards Code, and the Green Building Standards Code (CALGreen). The California Building Standards Code is enforceable at the project level. The California Energy Code (California Code of Regulations, Title 24, Part 6), which is incorporated into the California Building Standards Code, was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The California Energy Code is updated every three years by the California Energy Commission as the Building Energy Efficiency Standards to allow consideration and possible incorporation of new energy efficiency technologies and construction methods. The code is specifically designed to reduce wasteful and unnecessary energy consumption in newly constructed and existing buildings, including residential buildings. For residential uses of the type proposed, the standards require a suite of building energy efficiency requirements, combined with on-site renewable energy production, that ensure such uses have net zero electricity energy demand.

CALGreen regulations require all new buildings in the state to be more energy efficient and environmentally responsible. The current 2022 version is set to be replaced with a 2025 update that becomes effective in 2026. These comprehensive regulations are intended to achieve major reductions in interior and exterior building energy consumption.

Required compliance of all future individual residential development projects being planned for in the Housing Element update with existing building energy regulations, particularly the Building Energy Efficiency Standards and CALGreen, would ensure that building energy demand from such projects is not wasteful or inefficient. As noted above, the electricity demand from implementing the project would be minimal relative to total demand in Stanislaus County.

Project-Specific Energy Demand Reduction

As described in Section 8, Greenhouse Gas Emissions, mitigation measure GHG-1 requires that natural gas use be eliminated from the project to the extent feasible, with any proposed use off-set with GHG reductions from other sources that would also reduce energy demand. Transportation and/or building energy demand of a range of individual future residential projects would likely also be reduced with implementation of mitigation measures AQ-1 and AQ-2 included in Section 3, Air Quality. That mitigation requires individual projects of qualifying size be evaluated for their individual air quality impacts. Where impacts are identified, mitigation measures may call for incorporating project design features and/or implementing actions (e.g., vehicle miles traveled reduction measures) that reduce transportation source air emissions and associated transportation fuel demand. Individual projects must also comply with General Plan

Implementation Measure AR-7, which requires new projects to implement a number of project design features to reduce air emissions, a number of which would have the co-benefit of reducing vehicle miles traveled and associated transportation fuel demand. See the air quality/GHG analysis in Appendix C for reference to implementation measure AR-7.

Project Energy Demand is Necessary

Residential development being planned for in the Housing Element update is a common land use type. Further, new housing development is being prioritized by the state to help meet a statewide housing availability crisis. In this context, the project is necessary from the state perspective and from the City of Patterson perspective as a means to meet its fair share of housing growth needed to address the housing shortage. Therefore, future energy demand from implementing the Housing Element is considered necessary.

The proposed project would result in increased energy demand, but that demand would not be wasteful, inefficient or unnecessary. Therefore, the impact would be less than significant.

b. The City of Patterson has not adopted local plans for renewable energy or energy efficiency. The California Building Standards Code requires the proposed project be built to the Building Energy Efficiency Standards in effect at the time building permits are issued. By incorporating energy efficiency and renewable energy measures per the Building Energy Efficiency Standards, and incorporating green building features per the CALGreen standards, the project would have no impact from conflict with or obstruction of a state plan for renewable energy or energy efficiency.

7. GEOLOGY AND SOILS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	(1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☐	☒
	(2) Strong seismic ground shaking?	☐	☐	☒	☐
	(3) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
	(4) Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d.	Be located on expansive soil, creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Comments:

a. **(1) Known Active Earthquake Fault**. The sites identified in the Housing Element are not located within an Alquist-Priolo Earthquake Fault Zone designated by the California Geological Survey (California Department of Conservation 2024).

(2) Seismic Ground-Shaking. Although the City of Patterson is not located within an Alquist-Priolo Earthquake Fault Zone, the potentially-active San Joaquin Fault is thought to run northwest to southeast through the western portion of the city (City of Patterson 2010, p. 5.9-8). Faults in the region are capable of generating significant seismic events that could produce strong ground shaking within the city. According to the City's general plan EIR, ground shaking intensities in Patterson could reach levels equivalent to 50 times the acceleration of gravity (50 G) per ground acre (City of Patterson 2010, p. 5.9-16). The EIR identifies the city as lying within a portion of Stanislaus County where the greatest seismic damage is anticipated.

However, compliance with the California Building Code and the Uniform Building Code ensures that new development is designed to minimize seismic risks. In addition, general plan policies HS-1.1 and HS-1.2 require the preparation of site-specific geotechnical studies and the design of seismic-resistant infrastructure, such as underground utilities capable of withstanding ground shaking. Therefore, with adherence to these standards and policies, the proposed project would not exacerbate the potential substantial adverse effects involving seismic ground-shaking.

(3) Liquefaction. According to the California Department of Conservation's Earthquake Zones of Required Investigation tool, the City of Patterson and surrounding areas have not yet been mapped to assess the potential for soil liquefaction (California Department of Conservation 2024). However, the City's General Plan EIR acknowledges that while Patterson is subject to some risk of liquefaction during seismic events, the potential is relatively low and the occurrence of significant liquefaction is unlikely.

As discussed above, general plan policies HS-1.1 and HS-1.2 require the preparation of site-specific geotechnical studies and the implementation of appropriate mitigation measures to ensure that new development is designed to withstand seismic hazards, including liquefaction. These policies also require the incorporation of seismic-resistant infrastructure. Compliance with these standards and policies would ensure the proposed project would not exacerbate the potential substantial adverse effects involving liquefaction.

(4) Landslides. The sites identified in the Housing Element are relatively flat and are not located near any significant slopes or unstable geologic features that could pose a landslide risk. Therefore, implementation of the proposed project would not exacerbate the potential for adverse effects related to landslides.

b. **Soil Erosion**. The project area contains a variety of soil types, as shown in Table 5.9-1 of the general plan EIR (City of Patterson 2010, p. 5.9-3). While some soils in Patterson are classified as expansive, the relatively flat topography of the city limits the potential for

significant soil erosion. General Plan policy HS-1.1 requires the preparation of site-specific geotechnical studies for all new development, and Chapter 16.68 of the Patterson Municipal Code requires the preparation of a soil report by a qualified civil engineer for all new subdivisions (City of Patterson 2025a). In addition, Chapter 16.72 of the Municipal Code requires grading and erosion control for new development, including measures to prevent sedimentation and damage to off-site properties (City of Patterson 2025b). Implementation of these Municipal Code requirements and General Plan policies would ensure future development of the housing opportunity sites would not result in substantial soil erosion or loss of topsoil; impacts would be less than significant.

c. **Unstable Geologic Unit or Soil**. According to the City's General Plan EIR (2010), while expansive and unstable soils are present throughout Patterson, the highest concentrations of unstable soils are located west of Interstate 5, outside of the city limits. To address this concern, General Plan Policy LU-1.4 restricts development to areas that have been previously evaluated through geotechnical investigations, thereby avoiding construction on known unstable soils. In addition, compliance with General Plan Policy HS-1.1, which requires the preparation of site-specific geotechnical studies, and adherence to the City's adopted California Building Code further ensure that development of Housing Element sites would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.

d. **Expansive Soil**. According to the general plan EIR, there are multiple soil types present throughout Patterson (City of Patterson 2010, Table 5.9-1). These soils include but are not limited to Capay Clay, El Solyo silty clay loam, Vernalis clay loam, and Zacharias gravelly clay loam. Generally, these soils range in expansion potential from low/moderate to moderate/high, some of which may require remediation in the form of soil preparation or special design of building foundations as required by the Uniform Building Code.

   Development of sites identified in the Housing Element would be required to comply with general plan policies HS-1.1 and HS-1.2, which requires the preparation of site-specific geotechnical studies and the design of seismic-resistant infrastructure. Final design of proposed development would require review and approval by the City of Patterson Building Department to confirm conformance with the California Building Code standards. Therefore, the proposed project would not create a direct or indirect risk to life or property associated with expansive soils.

e. All future housing development would connect to the City's municipal wastewater treatment system.

f. **Unique Geologic Features.** The housing opportunity sites are relatively flat with no unique geologic features present (Google Earth 2025).

   Paleontological Resources. According to the City's general plan EIR (2010), there are no known paleontological resources within the city limits. Additionally, the *Baldwin Ranch and Zacharias Master Plan EIR* (2020) reported that no paleontological resources were observed during a field survey of the project area. However, ground-disturbing activities

associated with development of the Housing Element sites could potentially result in the accidental discovery of previously unknown paleontological resources. The direct or indirect destruction of a unique paleontological resource is considered a significant adverse environmental impact.

General plan policy PR-8 requires that all discretionary projects involving ground disturbance immediately notify the Planning Department if any prehistoric, archaeological, or paleontological resource is uncovered during construction. Construction must cease until a qualified archaeologist or paleontologist evaluates the find and recommends appropriate action (City of Patterson 2010, p. 5.15-18). Similarly, Mitigation Measure GEO-5 in the *Baldwin Ranch and Zacharias Master Plan EIR* (2020) requires notification of the Planning Department if fossils or fossil-bearing formations are discovered during any subsurface construction activities (City of Patterson 2020, p. 3.6-13). This policy and mitigation measure adequately mitigate and reduce potential impacts to paleontological resources, ensuring that impacts associated with the development of Housing Element sites would be less than significant.

8. GREENHOUSE GAS EMISSIONS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Comments:

The discussion in this section is based primarily on the *City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment* (hereinafter "GHG assessment") prepared by Illingworth & Rodkin, Inc. on October 23, 2023. It is included as Appendix C.

The San Joaquin Valley Air Pollution Control District (air district) has not established current guidance or adopted significance thresholds for evaluating greenhouse gas emissions under CEQA. The air district's existing guidance references earlier statewide reduction goals that were achieved in 2020 and does not address the State's current targets of reducing GHG emissions 40 percent below 1990 levels by 2030 and achieving carbon neutrality by 2045.

In the absence of adopted regional thresholds, agencies often reference methodologies developed by other air districts for consistency with state climate goals. The Bay Area Air Quality Management District, for example, has developed GHG significance thresholds for land use projects to assess consistency with the State's goals to reduce GHG emissions.

At the plan level, a project is considered consistent if it either meets the State's targets to reduce emissions 40 percent below 1990 levels by 2030 and achieve carbon neutrality by 2045, or is consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

At the project level, projects must include specific design elements to minimize GHG emissions. For buildings, this includes not installing natural gas appliances or plumbing in residential and nonresidential development and avoiding wasteful, inefficient, or unnecessary energy use as defined under CEQA Sections 21100(b)(3) and 15126.2(b). For transportation, projects must achieve a reduction in vehicle miles traveled (VMT) below regional averages consistent with the California Climate Change Scoping Plan or locally adopted Senate Bill 743 VMT targets—specifically, a 15 percent reduction below existing VMT per capita for residential projects, a 15 percent reduction below existing VMT per employee for office projects, and no net increase in

VMT for retail projects. Projects must also comply with Tier 2 electric vehicle infrastructure requirements under the most recent version of CALGreen. Alternatively, a project may be considered consistent if it aligns with a qualified local GHG reduction strategy that meets State CEQA Guidelines Section 15183.5(b).

The City of Patterson has not yet adopted a Climate Action Plan or other GHG reduction strategy that meets the criteria of Section 15183.5(b); therefore, GHG emissions associated with new development are evaluated qualitatively for consistency with statewide reduction goals and regulatory programs intended to achieve those targets.

a. **Generate Greenhouse Gas Emissions**. Changes in GHG emissions associated with the proposed project would result from both temporary construction activities and long-term operational sources. Construction-related emissions would primarily originate from equipment exhaust and worker or vendor trips to and from project sites. Long-term operational emissions would be generated by vehicle trips, building energy consumption, water use, and solid waste generation associated with future residential development of the Housing Element sites.

   Table 6, Annual Housing Element Update GHG Emissions (CO_2e), reports CalEEMod projections for GHG emissions from operation of the Housing Element update at build-out.

Table 6 Annual Housing Element Update GHG Emissions (CO_2e)

Source Category	Proposed New uses in 2040 (metric tons)
Mobile	29,944
Area	61
Energy Consumption	1,729
Energy Consumption from Natural Gas	5,204
Water Usage	162
Solid Waste Generation	1,249
Refrigeration	9
Total (MT CO_2e/year) with Natural Gas	38,358
Total (MT CO_2e/year) with no Natural Gas	33,153

SOURCE: Illingworth & Rodkin, Inc. 2025

As shown, CalEEMod estimated that full buildout of the Housing Element update would generate approximately 38,358 metric tons of carbon dioxide equivalent (MT CO_2e) per year with natural gas use, or 33,153 MT CO_2e per year if no natural gas was utilized, or if new development were fully electric. The largest contributors to total GHG emissions are vehicle travel, energy consumption, and solid waste. The modeling results do not account for future statewide regulations or utility-level clean energy transitions, which are expected to further reduce emissions over time.

Since the local air district has not adopted quantitative thresholds for GHG emissions, the proposed project was evaluated using the Bay Area Air Quality Management District's project-level thresholds as a proxy for consistency with state reduction goals of 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. To demonstrate consistency, projects must (1) avoid new natural gas connections, (2) avoid wasteful or inefficient electricity use, (3) provide electric-vehicle charging infrastructure meeting CALGreen Tier 2 standards, and (4) reduce vehicle miles traveled (VMT) by at least 15 percent below the regional average.

Because future projects developed under the Housing Element update could include natural gas infrastructure, may not provide sufficient EV charging, and are expected to exceed VMT reduction thresholds, the proposed project would not meet state GHG reduction targets, and impacts would therefore be significant.

Implementation of the following mitigation measure would reduce GHG impacts; however, impacts would remain significant and unavoidable. The mitigation measure is required to reduce GHG impacts to the extent feasible and demonstrate the City's commitment to implementing all practicable measures.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable greenhouse gas emissions and transportation mitigation measures in the Master Plan EIR.

Mitigation Measure (Sites 3-14)

GHG-1 Housing opportunity site 3-14 shall comply with the following measures:

Either:

a.1 Projects shall be required to be all electric and shall not include new natural gas infrastructure or appliances; or

a.2 Projects that include natural gas appliances shall be required to enter into an agreement with the City to reduce GHG emissions equivalent to those emitted by the project's natural gas appliances. Applicants would have to provide evidence to the City demonstrating that these emissions were properly identified and offset, prior to receiving any approval for construction (e.g., building permit).

And:

b. Projects shall be required to include electric vehicle charging infrastructure that meets current Building Code CALGreen Tier 2 compliance; and

c. Projects shall implement or participate in an eligible Transportation Demand Management plan.

Implementation of this measure would reduce GHG impacts to the extent feasible; however, the impacts would still exceed VMT thresholds, and therefore, remain significant and unavoidable even with mitigation.

b. **Plan Consistency.** Implementation of the Housing Element update would not conflict with or obstruct implementation of statewide GHG reduction measures identified in the California Air Resources Board's Scoping Plan. The City of Patterson enforces its adopted building and energy codes, which incorporate GHG-reduction strategies consistent with state policy. Future development under the Housing Element update would be required to comply with, at a minimum, the 2022 California Green Building Standards Code and the Title 24 Building Energy Efficiency Standards, which mandate the use of high-efficiency water fixtures, water-efficient irrigation systems, and energy-efficient building design and materials.

Compliance with these mandatory standards would ensure that individual projects constructed under the Housing Element update conform to applicable state and local GHG-reduction plans and regulations. Therefore, the Housing Element update would not conflict with or obstruct implementation of any plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☐	☒
e.	For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a public-use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Comments:

a. Construction of Housing Element update sites may involve the use and storage of some materials that are considered hazardous. Hazardous materials used during construction may include fuels, oils, mechanical fluids, and other chemicals. Residential development does not typically involve the use of acutely hazardous materials of the types that could pose a threat to public health and safety. Hazardous materials associated with operation of residential uses may include typical solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies.

Transportation, storage, use and disposal of hazardous materials during construction and operation of the proposed project would be required to comply with applicable federal, state, and local statutes and regulations. Therefore, the proposed project would not create a hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b. Several sites identified in the Housing Element are currently used, or were historically used, for agricultural purposes and may contain residual pesticides, herbicides, or fertilizers in the soil. The accidental release of such hazardous materials into the environment is most likely to occur during site grading or remediation activities. This potential for release represents a potentially significant environmental impact.

To address this risk, the City's general plan (2010) includes policies aimed at minimizing hazards associated with soil contamination. Specifically, Policy HS-3.8 requires that a site assessment for hazardous and toxic soil contamination be conducted prior to the approval of development, when warranted based on a property's land use history. Additionally, the general plan EIR (2010) includes Mitigation Measure HS-10, which requires project applicants implement a soil sampling and analysis plan to determine presence and extent of any residual herbicides, pesticides, and fumigants on currently or historically-farmed land in agricultural areas that would be disturbed during construction of a proposed project. Compliance with this policy and mitigation measure would ensure development of Housing Element sites does not result in impacts related to the potential for accidental hazardous materials into the environment during implementation activities

c. Several housing sites identified in the Housing Element are located within one-quarter mile of existing schools, including:

- Creekside Middle School (535 Peregrine Dr);
- Northmead Elementary School (625 L St);
- Del Puerto High School (640 M St);
- Sacred Heart Catholic School (505 M St);
- Patterson High School (200 N 7th St);
- Las Palmas School (624 W Las Palmas Ave);
- Berean Christian School (650 W Las Palmas Ave);
- Apricot Valley Elementary School (1320 Henley Pkwy);
- Walnut Grove Middle School (775 Hartley St);
- West Valley Learning Center (610 N Hartley St); and
- Patterson Preschool Academy (610 N Hartley St).

As discussed in checklist item "a" above, construction and operation of Housing Element sites may involve the use and storage of materials that are considered hazardous. However, development of Housing Element sites for residential use would not be permitted to emit hazardous emissions or handle large quantities of hazardous or acutely

hazardous materials, substances, or waste. Further, any transportation, use or storage of hazardous materials would be subject to adherence to federal, state, and local regulations. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. None of the sites identified in the Housing Element are located on or adjacent to sites identified on any of the following lists compiled pursuant to Government Code section 65962.5. Therefore, the proposed project would not create a significant hazard to the public or the environment.

- Hazardous Materials Waste and Substances Sites from the Department of Toxic Substances Control EnviroStor Database (Department of Toxic Substances Control 2025);
- Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker Database (State Water Resources Board 2025);
- Solid Waste Disposal Sites Identified by Water Board with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit (California Environmental Protection Agency 2025a);
- "Active" Cease and Desist Order and Cleanup and Abatement Orders from Water Board (California Environmental Protection Agency 2025b); and
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control (California Environmental Protection Agency 2025c).

e. Some sites identified in the Housing Element are located within the Crows Landing Airport Land Use Compatibility Plan Airport Influence Area (County of Stanislaus 2018). However, none of the sites—nor any portion of the city limits—fall within the 55 dB CNEL noise contour or safety zones identified for the airport (County of Stanislaus 2018, Exhibit CRO-9A). Therefore, implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area.

f. Development or redevelopment of vacant or underutilized infill sites identified in the Housing Element is not anticipated to alter the existing street network or interfere with the City's emergency evacuation plan.

Development of housing opportunity sites within master plan areas will be required to comply with general plan policies designed to preserve emergency access. Specifically, Policy HS-4.2 requires the City to ensure emergency routes remain free of traffic impediments during and after construction, and Policy HS-3.7 requires all new development provide for adequate fire equipment access (City of Patterson 2010).

Development plans will be reviewed by the City's building and fire departments to verify that proposed roadways and driveways meet all local ordinance and California Building Code requirements for emergency access. Compliance with general plan policies and state

building requirements would ensure development of the Housing Element sites would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. The housing opportunity sites are not located within a state responsibility area; however, Sites 2, 12, and 13 are located near local responsibility areas designated as moderate, high, and very high fire hazard severity zones, which generally extend in a northwest–southeast orientation along Interstate 5 in the western portion of Patterson (California Department of Forestry and Fire Protection 2024). The nearest state responsibility area with a very high fire hazards classification is approximately half a mile west of these sites (California Department of Forestry and Fire Protection 2024). Therefore, impacts associated with wildfire risk would be less than significant. Refer to Section 20, Wildfire, for a discussion of impacts.

10. HYDROLOGY AND WATER QUALITY

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒	☐	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
(1)	Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
(2)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
(3)	Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
(4)	Impede or redirect flood flows?	☐	☐	☒	☐
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒	☐	☐

Comments:

a. **Construction Water Quality Impacts.** Construction of the housing opportunity sites would involve ground disturbance (site preparation, grading, and likely excavation). Delivery, handling, and storage of construction materials and wastes; equipment refueling; and equipment use and maintenance could release oil, grease, fuels, and other pollutants.

If not properly controlled, eroded soil and other contaminants could be transported in stormwater runoff to the City's drainage system and downstream receiving waters.

Patterson Municipal Code Chapter 13.32 (Urban Storm Water Quality Management and Discharge Control) requires implementation of construction-phase best management practices, including erosion and sediment controls, soil stabilization, dewatering practices, source controls, pollution-prevention measures, and prohibits non-stormwater discharges. The City also enforces compliance with the California National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires preparation and implementation of a Stormwater Pollution Prevention Plan.

Implementation of City Municipal Code requirements presented above would ensure that future residential construction would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Operational Water Quality Impacts. Construction of new residential units identified in the Housing Element update would increase impervious surface area within Patterson and, if unmanaged, could increase the volume and rate of stormwater runoff. According to the general plan, the City's municipal storm drain system collects runoff through curb inlets/catch basins and conveys it through the storm drain network to local receiving waters, including Del Puerto Creek, Salado Creek and the San Joaquin River. Stormwater is not routed to a treatment facility prior to discharge into these local creeks and river.

Del Puerto Creek, Salado Creek, and the San Joaquin River are listed as impaired water bodies under Section 303(d) of the federal Clean Water Act (California State Water Resources Control Board 2024); accordingly, stormwater discharges from future residential development would be regulated. The City has adopted a stormwater management and discharge control ordinance (Patterson Municipal Code Chapter 13.32), and the General Plan includes relevant policies: Policy PS-3.5 requires drainage system discharges to comply with applicable state and federal pollutant discharge requirements; Policy PS-3.11 requires developers to comply with conditions of approval to prevent silt from entering storm drainage systems during grading; Policy PS-3.13 requires new development to incorporate runoff control measures to minimize discharge of surface pollutants; and Policy PS-3.14 requires erosion control measures to minimize sedimentation of streams and other natural drainage features. These policies apply to all future development of housing opportunity sites.

Additionally, projects that create or replace 2,500 square feet or more of impervious surface would also be subject to the NPDES Phase II Small MS4 General Stormwater Permit post-construction standards, including implementation of low impact development measures (e.g., runoff capture and reuse, on-site stormwater harvesting) and hydromodification management, as applicable. The use of low impact design measures would ensure that pollutants in stormwater are treated before being discharged from project sites and that peak runoff from the site does not exceed existing volumes.

Implementation of the Municipal Code, General Plan policies, and the NPDES General Stormwater Permit (if applicable) would ensure operation of future residential uses would not violate water quality standards or waste discharge requirements, nor would it substantially degrade surface water or groundwater quality.

b. **Groundwater Supplies.** The City of Patterson relies exclusively on groundwater from the Delta–Mendota Subbasin, which is classified by the California Department of Water Resources as critically overdrafted. The City owns and operates a public water system with five active production wells and two standby wells that supply approximately 23,304 residents (Delta-Mendota SGMA 2024).

Development of all opportunity sites is estimated to result in a total annual water demand of approximately 1,851 acre-feet per year, equivalent to about 603.5 million gallons per year or 1.65 million gallons per day (mgd). Refer to Section 19, Utilities and Service Systems, checklist question "b" for details. This level of development could substantially decrease groundwater supplies which will impede sustainable groundwater management of the basin without mitigation. Refer to checklist question "e" below for further discussion of the sustainable groundwater management approach for the development of all opportunity sites.

Groundwater Recharge. Development of the housing units associated with the Housing Element update will affect groundwater recharge conditions.

The City of Patterson Municipal Code Chapter 13.32 (Urban Storm Water Quality Management and Discharge Control) and the Post-Construction Standards Manual adopted under Ordinance 653 require all new development and significant redevelopment projects to incorporate stormwater management measures to protect water quality and maintain natural hydrology. Projects that create or replace impervious surfaces must implement best management practices to minimize runoff, control pollutants, and preserve pre-development drainage patterns. Developers are required to prepare and submit a stormwater control plan demonstrating compliance with low impact development and hydromodification management requirements. Projects that disturb one acre or more must also obtain coverage under the State Water Resources Control Board's Construction General Permit and prepare a Stormwater Pollution Prevention Plan. These measures promote groundwater recharge through on-site stormwater infiltration features such as pervious pavement, bio-retention areas, and on-site retention or detention basins, thereby maintaining natural infiltration processes and reducing potential long-term effects on groundwater recharge.

Conclusion. In addition to the City's standards, the *Delta-Mendota SGMA Delta-Mendota Subbasin Groundwater Sustainability Plan* (GSP) identifies the Del Puerto Creek Recharge and Recovery Project as a key management action to enhance local groundwater sustainability (Delta-Mendota SMGA, 2024, p. 77). The Del Puerto Creek Recharge and Recovery Project involves the development of percolation ponds and diversion structures to divert and infiltrate stormwater discharges from Del Puerto Creek, provide the recharge of purchased alternative water supply to offset the water demand for new

development, and infiltrate stormwater runoff captured from the planned Zacharias Master Plan development. Patterson's stormwater management requirements in combination with the planned recharge project, which includes the infiltration of purchased alternative water supply to offset the additional demand and recharge reductions associated with new residential development, would reduce the potential impact on groundwater recharge to less than significant for Sites 3-14. In addition to the City's Municipal Code requirements, implementation of the following mitigation measure from the Master Plan EIR would ensure impacts related to groundwater supplies and groundwater recharge are less than significant for Sites 1A, 1B, and 2.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable mitigation measures in the Master Plan EIR Settlement Agreement.

See additional discussion regarding groundwater recharge in "e" below associated with the Sustainable Groundwater Management Plan.

c. **Drainage Patterns.** Future residential development would increase impervious surface area and could alter existing drainage patterns within the City. However, all future development would undergo project-level environmental and design review at the time specific development proposals are submitted. Development of Housing Element sites would also be required to comply with several general plan policies and municipal code regulations governing stormwater management and flood protection, including the following.

General Plan Policy HS-2.14 requires new development to incorporate runoff-control measures to minimize peak flows or participate in comprehensive drainage planning and financing programs. Chapter 13.32 of the Patterson Municipal Code (Urban Storm Water Quality Management and Discharge Control) requires the implementation of best management practices to control the volume, rate, and pollutant load of stormwater from new development and redevelopment. These requirements include soil stabilization, dewatering controls, prohibited discharge provisions, and other pollution-prevention measures consistent with the Clean Water Act. Additionally, Municipal Code Section 17.12.060 (Floodways) requires any development within Federal Emergency Management Agency (FEMA) Flood Zones A1–30 and AE to submit hydrologic and hydraulic analyses prepared and sealed by a qualified professional engineer. The analysis must demonstrate that the cumulative effect of the proposed development, when combined with other projects, would not increase base-flood water-surface elevations by more than one foot at any point within the City.

Implementation of these general plan policies, municipal code provisions, and applicable NPDES requirements (as discussed in checklist question "a") would ensure that stormwater quality, runoff, and drainage impacts associated with future residential development are effectively controlled. Therefore, impacts related to alteration of drainage patterns or stormwater runoff would be less than significant.

Refer to Section 7.0, Geology and Soils, checklist item (b) for additional discussion of potential erosion impacts and related control measures.

d. **Release of Pollutants due to Project Inundation.** The housing opportunity sites are not located within a coastal area; therefore, tsunamis are not considered a hazard. The housing sites are also not located within any dam inundation area as identified in the General Plan EIR Figure 5-13.6. The potential risk of seiche is low in the City of Patterson (City of Patterson 2010, p. 5.9-13).

Portions of the City, including some of the housing sites, as well as the adjacent unincorporated County, are located with Special Flood Hazard Areas (FEMA 2026). Patterson Municipal Code Chapter 17 establishes construction requirements for development within mapped flood hazard areas; future housing opportunity sites must comply with these standards. General Plan Policy HS-2.5 further requires new residential construction to elevate the lowest floor at least 12 inches above the 100-year flood level (City of Patterson 2010). As discussed under checklist item (a), the project would also be subject to the City's Stormwater Management and Discharge Control Ordinance (PMC §13.32); General Plan Policies PS-3.5, PS-3.11, PS-3.13, and PS-3.14; and—where 2,500 square feet or more of impervious surface is created or replaced—the NPDES Phase II Small MS4 General Permit post-construction standards. Collectively, these requirements ensure appropriate elevation, runoff control, and water-quality protection so potential flood hazard impacts, including release of pollutants, are less than significant.

e. **Water Quality Control Plan**. The *Water Quality Control Plan for the Sacramento River and San Joaquin River Basins* (hereinafter "basin plan"), adopted in February 2019 by the Central Valley Regional Water Quality Control Board, serves as the applicable water quality control plan for the City of Patterson, which lies within the jurisdiction of the Central Valley Region. Specifically, Patterson lies within the San Joaquin River Basin. Projects are required to comply with NPDES permit requirements, stormwater management provisions under Patterson Municipal Code Chapter 13.32, and water quality standards established in the basin plan. Compliance with these regulatory frameworks ensures that project-related discharges and drainage management activities remain consistent with the San Joaquin River Basin water quality control objectives. Therefore, implementation of the Housing Element update would not conflict with or obstruct implementation of the adopted water quality control plan.

Sustainable Groundwater Management Plan. The Sustainable Groundwater Management Act is a state law requiring groundwater basins to be sustainable. The act enables eligible local agencies to form Groundwater Sustainability Agencies (GSA), develop Groundwater Sustainability Plans (GSP) for designated basins in their jurisdiction by 2020, and achieve groundwater sustainability within 20 years of plan implementation.

Within the Delta–Mendota Subbasin, the Delta–Mendota Sustainable Groundwater Management Agency coordinates GSP preparation, and the City of Patterson serves as the GSA for its jurisdiction. The Department of Water Resources (DWR) classifies the

subbasin as critically overdrafted (Delta-Mendota SGMA 2024). The subbasin's GSAs submitted six GSPs and a common chapter in January 2020; DWR deemed them incomplete in January 2022 and later inadequate in March 2023, triggering potential State Water Resources Control Board intervention. In response, the 23 GSAs prepared a single consolidated GSP to address DWR's corrective actions by standardizing data and methods, adopting common definitions of "undesirable results," and establishing Sustainable Management Criteria consistent with SGMA. The City adopted the consolidated GSP on November 19, 2024.

The 2024 consolidated GSP identifies a series of management actions that each GSA must implement to achieve and maintain basin sustainability. Management actions applicable to the City of Patterson GSA include: implementation of drought contingency planning in urban areas (NDM-2); construction of percolation ponds for stormwater capture and groundwater recharge (NDM-10); and the implementation of a Pumping Reduction Plan to reduce basin-wide pumping by approximately 42,000 acre-feet per year (Delta-Mendota SGMA 2024, p. 319).

The first two management actions implement already contemplated management activities and projects. First, the drought contingency planning in urban areas (NDM-2) would implement the City's existing Urban Water Management Plan policies for water shortage periods, but can be expanded upon, if necessary, in order to minimize impacts to groundwater storage and water levels when supplies become limited. Second, the construction of percolation ponds for stormwater capture and groundwater recharge (NDM-10) includes the construction of percolation ponds that would cover just over 14 acres. Initially, planning for use of the percolation ponds included the recharge of stormwater discharges from Del Puerto Creek and stormwater runoff captured from the Zacharias Master Plan development. (NDM-10). With the adoption of the 2024 consolidated GSP, the sources of recharge associated with the ponds was expanded to include purchased alternative water supply to offset water demand from new development. The expansion of the sources of recharge through the percolation ponds is necessary to comply with the requirements under the Pumping Reduction Plan that is established in the 2024 consolidated GSP (Delta-Mendota SGMA 2024, p. 319).

The third management action, the implementation of a Pumping Reduction Plan, has been implemented in the City's region of the Delta Mendota Subbasin through a cooperative group of GSAs referred to as the Northern Delta-Mendota Region. The Northern Delta-Mendota Region Pumping Reduction Plan requires the City to reduce pumping by 460 AFY by 2030 from its model estimated pumping for water years 2019-2023. To meet this requirement and to allow for additional water demand from new development in the City, the City must offset the additional new demand through the purchase of alternative water supply and the recharge of that water. The percolation ponds for stormwater capture and groundwater recharge provide the necessary opportunity for recharge to allow new development while still reducing the City's water demand as required under the Northern Delta-Mendota Region Pumping Reduction Plan. Implementation of these requirements would apply to all new development in the City.

The City of Patterson is responsible for these action items and implements that responsibility by applying appropriate mitigation measures to ensure future development projects pursuant to the Housing Element update are implemented. Therefore, the proposed project would not conflict with or obstruct implementation of a sustainable groundwater management plan with mitigations measures to implement the management actions identified in the 2024 consolidated GSP.

Therefore, compliance with the 2024 consolidated GSP management actions identified above would ensure the proposed project does not conflict with or obstruct implementation of the sustainable groundwater management plan.

Additionally, City ordinance and policies address water conservation measures. The City of Patterson implements a Water Conservation Program to promote efficient water use and reduce demand on the City's groundwater supply. The program combines public education, mandatory outdoor watering restrictions, and rebate and incentive programs. The mandatory watering schedule limits landscape irrigation to designated days and times, prohibits runoff and watering during rainfall, and establishes penalties for water waste (City of Patterson 2025b). The City also offers rebates for installing high-efficiency fixtures and replacing turf with drought-tolerant landscaping.

The program is supported by Municipal Code Chapter 13.24 (Water System), which prohibits water waste and authorizes restrictions during shortages (City of Patterson 2025c) and Chapter 15.48 (Water-Efficient Landscape), which requires water-efficient landscape design and maintenance (City of Patterson 2025d). Together, these provisions ensure that new residential development incorporates efficient fixtures, irrigation systems, and drought-tolerant landscaping consistent with the City's Urban Water Management Plan and Groundwater Sustainability Plan.

11. LAND USE AND PLANNING

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Cause any significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐

Comments:

a. All sites identified in the Housing Element are located within the City of Patterson and are proposed for residential development consistent with existing land uses throughout the city. The Zacharias Master Plan area and the Baldwin Ranch Master Plan area have already been annexed and are within city limits. These master plan areas are planned for a mix of land uses that are compatible with existing development throughout the city, including residential, commercial, mixed-use, open space/parks, and public/quasi-public. As such, implementation of the proposed project would not physically divide an established community.

b. The proposed project includes amendments to the General Plan and Zoning Ordinance for Sites 6-14 to increase allowable residential densities within the High Density Residential, Neighborhood Commercial, and Downtown Core designations, and to facilitate the development of affordable housing on eight sites. Because these changes would result in densities that exceed those currently permitted under the adopted General Plan, the project would temporarily be inconsistent with existing land use designations until the General Plan and zoning amendments are adopted.

However, the proposed amendments are themselves part of the project. The purpose of the amendments is to accommodate the City's Regional Housing Needs Allocation and to further General Plan and Housing Element goals of promoting infill development and supporting affordable housing. Although the project would modify land use densities, it would not conflict with any adopted plan, policy, or regulation intended to avoid or mitigate an environmental effect, because the amendments would maintain consistency within the City's land use framework and continue to implement the overarching goals of the General Plan and Housing Element. Furthermore, environmental effects associated with the proposed land use changes, including potential effects related to increased density (e.g., traffic, air quality, noise, and infrastructure capacity), are evaluated throughout this initial study. As discussed in Sections 8.0 Greenhouse Gas Emissions and 17.0 Transportation, the proposed project would result in significant and unavoidable impacts.

12. MINERAL RESOURCES

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Result in loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan?	☐	☐	☐	☒

Comments:

a-b. According to the City's general plan EIR (2010), there are no active or planned mineral extraction operations within Patterson. No impacts related to mineral resources were anticipated with buildout of the general plan planning area. Similarly, the *Baldwin Ranch and Zacharias Master Plan EIR* (2020) concluded mineral resources an environmental issue not deemed significant. Therefore, the proposed project would not affect the availability of any state or locally designated mineral resources.

13. NOISE

Would the project result in:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in applicable standards of other agencies?	☐	☐	☒	☐
b.	Generation of excessive ground-borne vibration or ground borne noise levels?	☐	☐	☒	☐
c.	For a project located within the vicinity of a private airstrip or an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Comments:

a. **Temporary Construction Noise Impacts**. Future development of the sites identified in the Housing Element would result in temporary increases in ambient noise levels in the vicinity of each project during construction. However, because no specific development plans are proposed at this time, it would be speculative to predict precise noise levels, locations, or durations of construction activity, including potential effects on adjacent properties.

When development of specific sites identified in the Housing Element is proposed, each project would be subject to the noise regulations outlined in Chapter 6.44 of the Patterson Municipal Code, which prohibit construction-related activities, including the operation of equipment or performance of outdoor construction or repair work, between the hours of 10:00 p.m. and 7:00 a.m. (City of Patterson 2025). In addition, the general plan EIR includes Mitigation Measure HS-10, which is designed to reduce construction-related noise impacts. Compliance with the City's noise control regulations and implementation of Mitigation Measure HS-10, as well as applicable construction noise-related mitigation measures in the Master Plan EIR, would reduce potential construction-related noise impacts to a less-than-significant level.

Permanent Operational Noise Impacts. Existing sensitive noise receptors could be affected by operational noise associated with the development or redevelopment of properties under the proposed project. Noise generated by onsite residential activities would be subject to the City's noise regulations outlined in Chapter 6.44 of the Patterson Municipal Code.

In addition, future development would be required to comply with General Plan Policy HS-5.4 (City of Patterson 2010). Policy HS-5.4 requires new development be evaluated according to Figure HS-1 of the general plan to determine compatibility with existing and future transportation noise levels. Additionally, applicable operational noise impacts in the Master Plan area would be mitigated with implementation of the applicable mitigation measures in the Master Plan EIR. Compliance with these noise thresholds would reduce potential onsite noise impacts to a less-than-significant level.

b. The primary sources of man-made vibration include sonic booms, blasting, pile driving, pavement breaking, demolition, diesel locomotives, and rail-car coupling. Of these, only pavement breaking, demolition of existing on-site structures, and potentially pile driving may occur as part of the construction activities associated with implementation of the Housing Element update. Vibration generated during construction could be perceptible at nearby sensitive land uses, particularly during the operation of heavy equipment, truck movements, or paving activities.

As noted in checklist item "a," construction-related noise and vibration activities are restricted to the hours of 7:00 a.m. to 10:00 p.m. daily, pursuant to Chapter 6.44 of the Patterson Municipal Code. Additionally, future development of sites identified in the Housing Element would be subject to general plan Policy HS-5.7, which requires that proposed noise-sensitive land uses, such as residential developments, prepare an acoustical analysis during the environmental review process. This analysis ensures that appropriate noise mitigation measures are incorporated into project design, in accordance with the noise standards set forth in Table HS-1 and the performance standards in Table HS-3 of the general plan. Acoustical analyses typically evaluate both noise and vibration impacts associated with construction and operation, and would therefore identify and recommend mitigation measures to reduce any significant impacts related to vibration.

Compliance with general plan Policy HS-5.7, along with the implementation of vibration mitigation measures identified in project-specific acoustical analyses, would ensure that potential significant impacts associated with the generation of excessive ground-borne vibration or ground-borne noise during implementation of housing projects identified in the Housing Element update would be reduced to a less-than-significant level.

c. Some sites identified in the Housing Element are located within the Crows Landing Airport Land Use Compatibility Plan Airport Influence Area (County of Stanislaus 2018). However, none of the sites—nor any portion of the city limits—fall within the 55 dB CNEL noise contour or safety zones identified for the airport (County of Stanislaus 2018, Exhibit CRO-9A). Therefore, implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels associated with airport operations.

14. POPULATION AND HOUSING

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☒	☐	☐
b.	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Comments:

a. The proposed project would result in new residential development and a corresponding increase in population within the City of Patterson. An estimated population growth of approximately 17,560 residents is anticipated as a result of the project. This growth has been considered and planned for as part of this environmental analysis. Accordingly, the environmental impacts associated with the anticipated population increase are evaluated throughout this initial study, some of which require mitigation.

b. None of the sites identified in the Housing Element contain existing residential uses. Therefore, implementation of the proposed project would not result in the displacement of people or housing, nor would it require the construction of replacement housing elsewhere.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☐	☒

Comments:

a. The Patterson Fire Department provides all-risk emergency services within the City of Patterson and, through an automatic-aid agreement, to portions of the West Stanislaus Fire Protection District service area. The Patterson Fire Department operates two fire stations in Patterson: Fire Station 1 (headquarters), located at 344 W. Las Palmas Avenue, and Fire Station 2, located at 1950 Keystone Pacific Parkway. Department personnel include a fire chief, three division chiefs, six captains, two captain/paramedics, four engineers, two engineer/paramedics, and three firefighter/paramedics. Daily emergency response staffing consists of six personnel citywide: one chief officer, two captains, two engineer/firefighters, and one firefighter/paramedic. As of 2014, the Patterson Fire Department held an Insurance Services Office (ISO) Public Protection Classification rating of 02/2Y (City of Patterson 2025a). This ISO rating reflects the department's effectiveness in fire suppression and is used by insurance companies to help determine property insurance premiums, with lower scores indicating superior fire protection services.

   The Baldwin Ranch and Zacharias Master Plan EIR (2020) determined that full buildout of the master plan areas could result in the need for new or expanded fire protection facilities. To address this potential impact, the EIR includes a mitigation measure requiring all project applicants to pay applicable public safety development impact fees in accordance with the City of Patterson's most recently adopted fee schedule. The EIR concluded that compliance with this measure would reduce potential impacts related to fire protection services to a less-than-significant level.

Chapter 3.64 (New Development Impact Fees) of the City of Patterson Municipal Code supports the expansion of municipal facilities, including fire protection services, by requiring that all new development pay impact fees, which shall be placed into a special fund designated for the acquisition or construction of new or expanded facilities (City of Patterson 2025b). Additionally, the City's general plan recognizes that population growth will generate increased demand for fire and emergency services. To address this anticipated demand, the general plan includes Policy PS-6.1, requiring the City maintain an ISO rating of five or better and Policy PS-6.4 requires the City maintain a ratio of one firefighter per 1,000 residents (City of Patterson 2010b, p. PS-10). In support of these policies, Implementation Measure PS-11 directs the City to collect development impact fees, as needed, to fund public services in accordance with Government Code Section 66000 et seq. (City of Patterson 2010b, p. PS-18).

The specific environmental impacts associated with the expansion or construction of a new fire station cannot be evaluated at this broad level of analysis, as the location, design, and scope of such improvements are not yet known. Project-specific environmental review will be required once a detailed proposal for expansion or new construction is brought forward. In the interim, Patterson Municipal Code Chapter 3.64 and General Plan Policies PS-6.1 and PS-6.4 acknowledge the need for future expansion of fire protection facilities and establish mechanisms—such as collection of development impact fees and maintaining service level goals—to ensure adequate fire service capacity. These policies serve to reduce potential impacts to a less-than-significant level.

b. The City of Patterson contracts with the Stanislaus County Sheriff's Department to provide police protection services (City of Patterson 2025b). The Patterson Division of the Sheriff's Department is located at 301 South First Street in Patterson. The Division deploys four patrol deputies during peak hours and maintains a dedicated four-person Street Crimes Unit.

The Baldwin Ranch and Zacharias Master Plan EIR (2020) determined that full buildout of the master plan areas could result in the need for new or expanded police protection facilities. To address this potential impact, the EIR includes a mitigation measure requiring all project applicants to pay applicable public safety development impact fees in accordance with the City of Patterson's most recently adopted fee schedule. The EIR concluded that compliance with this measure would reduce potential impacts related to police protection services to a less-than-significant level.

Similar to the response provided for checklist item "a" above, the specific environmental impacts associated with the expansion or construction of a new police station cannot be assessed at this broad level of analysis, as the location, design, and scope of such improvements have not yet been determined. A project-specific environmental review will be conducted at the time a detailed proposal for expansion or new construction is brought forward.

The City's general plan acknowledges and plans for the impacts of growth on public services, including police protection. Policies PS-5.1 and PS-5.3 require the City to

maintain adequate police staffing levels and to establish police stations or patrol offices to ensure minimum feasible response times. Specifically, Policy PS-5.3 sets a service goal of maintaining a ratio of 1.5 police officers per 1,000 residents (City of Patterson 2010, p. PS-10). In support of these policies, Implementation Measure PS-11 directs the City to collect development impact fees, as needed, to fund public services in accordance with Government Code Section 66000 et seq. (City of Patterson 2010, p. PS-18).

In the interim, Patterson Municipal Code Chapter 3.64 and General Plan Policies PS-5.1 and PS-5.3 acknowledge the need for future expansion of police protection facilities and establish mechanisms—such as collection of development impact fees and maintaining service level goals—to ensure adequate police service capacity. These policies serve to reduce potential impacts to a less-than-significant level.

c. Buildout of the 6th Cycle Housing Element is planned over an eight-year planning horizon. Therefore, it is conservatively assumed that implementation of the proposed project could result in the need for new or physically altered school facilities, the construction of which may cause significant environmental impacts.

Students generated by the proposed project would be served by schools within the Patterson Joint Unified School District (hereinafter school district). The school district uses a student yield factor of 0.707 students per household for all housing types (Patterson Joint Unified School District 2025). Based on these rates, the proposed project has the potential to generate approximately 3,477 new students over the eight-year planning period, calculated as follows: 4,919 units × 0.707 student yield factor = 3,477 total new students. The anticipated increase in student population would increase demand on existing school facilities and could result in the need for new or expanded facilities.

The City's General Plan anticipates the potential for up to 21,248 new students at full buildout over a 40-year planning horizon (City of Patterson 2010, p. 5.3-31), which would require the development of new school facilities. To address this need, the General Plan includes several policies focused on school facility planning and impact mitigation. Policy PS-7.6 requires the City to approve only those development proposals that have fully recognized and mitigated their impacts on school facilities. In addition, Policies PS-7.1, PS-7.2, PS-7.3, PS-7.4, PS-7.6, and PS-7.7 collectively direct the City to coordinate with the school district to plan for, finance, and develop adequate school facilities to serve both existing and future development (City of Patterson 2010a).

The *Baldwin Ranch and Zacharias Master Plan* (2020) includes provisions for new school facilities to accommodate future growth within those master plan areas. Specifically, the Zacharias Master Plan area contemplates the development of an approximately 14-acre elementary school site and a 16-acre middle school site within the plan area. These facilities were evaluated in the *Baldwin Ranch and Zacharias Master Plan EIR* (2020). According to the EIR, applicants who dedicate school sites within the Zacharias Master Plan area would receive credit for the value of the land toward their school development fee obligation. Applicants not dedicating school sites would be required to pay development fees to support capital improvements to school facilities.

Developers of the sites identified in the Housing Element would be required to pay development impact fees to the school district at the time of building permit issuance for each individual housing project. The school district would use these fees to fund new school facilities and offset impacts associated with increased student enrollment resulting from new development.

Pursuant to California Government Code Section 65996, the payment of applicable school impact fees is deemed to fully mitigate the cumulative impacts of new residential development on school facilities under CEQA. Therefore, with payment of state-mandated and general plan-required development impact fees, potential impacts on school facilities would be reduced to a less-than-significant level.

d. The proposed project is anticipated to result in population growth over the next eight years, which could lead to increased use of existing parks and recreational facilities within the city. The general plan includes policies to ensure that parkland needs are addressed as development occurs. Specifically, Policy PR-1.2 establishes a standard of five acres of parkland per 1,000 residents, while Policy PR-1.3 requires new development to contribute toward meeting this standard through land dedication, park improvements, payment of in-lieu fees, or a combination of these mechanisms (City of Patterson 2010).

Based on an estimated increase of 17,560 new residents over the next eight years, the project would generate the need for approximately 88 additional acres of parkland. As residential development occurs, project developers will be required to contribute toward the provision of parkland in accordance with City requirements at the time of development.

The *Baldwin Ranch and Zacharias Master Plan* (2020) includes provisions for new park facilities to accommodate future growth within the master plan area. Specifically, the Baldwin Ranch Master Plan area proposes the development of approximately two acres of parks, two acres of dual use park/basin, and one acre of buffer/trails. The Zacharias Master Plan area proposes the development of 60.7 acres of parks/trails and 13.4 acres of open space/lake. These park facilities were evaluated in the *Baldwin Ranch and Zacharias Master Plan EIR* (2020). According to the EIR, the City may require the applicants to pay in-lieu fees to fund the development of park facilities elsewhere; these measures would reduce impacts associated with parks to a less-than-significant level.

The general plan requirement that all development shall either dedicate land, improvements, or pay in-lieu fees towards the development of parkland reduces potential impacts to parks to less than significant.

e. The proposed project is anticipated to result in population growth over the next eight years, which may increase demand for library services in the City. Patterson is served by the Stanislaus County Public Library system, with the local branch, Patterson Public Library, located at 46 North Salado Avenue.

The City's general plan (2010) includes policies to ensure continued access to adequate library services as population growth occurs. Specifically, Policy PS-7.8 directs the City to coordinate with the Stanislaus County Library system to maintain and improve library services for Patterson residents. Additionally, the *Baldwin Ranch and Zacharias Master Plan EIR* (2020) states that project applicants would be required to pay in-lieu fees to support the development or enhancement of library facilities, thereby mitigating impacts associated with increased demand.

Although implementation of the proposed project may increase use of the Patterson Public Library, such growth has been anticipated by the general plan and the *Baldwin Ranch and Zacharias Master Plan*, and was evaluated in the respective EIRs for both plans. Neither EIR identified significant impacts to library services as a result of new development. Therefore, the proposed project is not anticipated to result in significant impacts to existing library facilities.

16. RECREATION

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Comments:

a-b. The proposed project is the implementation of the Housing Element update, which would result in population growth and may lead to increased use of existing parks and recreational facilities within the City of Patterson. The City offers a variety of parklands and recreational amenities to meet community needs. The City categorizes parks by size and function, including pocket parks (less than three acres), neighborhood parks (three to 10 acres), community parks (10 to 50 acres), and regional parks (50 acres or more).

For additional information regarding potential impacts on park and recreational facilities, refer to Section 15.0, Public Services, checklist questions "d".

17. TRANSPORTATION

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b.	Conflict or be inconsistent with CEQA guidelines section 15064.3, subdivision (b)?	☒	☐	☐	☐
c.	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d.	Result in inadequate emergency access?	☐	☐	☐	☒

Comments:

a. The proposed housing element update would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. Housing projects pursuant to the Housing Element would be subject to all applicable City guidelines, standards, and specifications related to transit, bicycle, or pedestrian facilities and would be reviewed on a project-specific basis to ensure compliance.

b. Kittelson & Associates, Inc. prepared the *City of Patterson Housing Element—Vehicle Miles Traveled (VMT) Impact Assessment Memorandum*, dated September 16, 2025, to evaluate whether the project would result in significant VMT impacts. The memorandum is included as Appendix E.

Per the requirements of Senate Bill 743 (SB 743), VMT is the new performance measure used in CEQA transportation analysis. VMT became the required performance measure on July 1, 2020 replacing the previous performance measure which was level of service. The VMT generated by land development projects is compared to various screening criteria and significance thresholds to determine whether the level of VMT would be considered to be significant.

CEQA allows agencies to adopt formal methodologies and thresholds of significance for environmental evaluation, or to apply methodologies and thresholds on a case-by-case basis. Neither the City of Patterson, nor the County of Stanislaus, have adopted VMT-specific methodologies or thresholds; therefore, this analysis relies on statewide guidance

published by the Governor's Office of Land Use and Climate Innovation and references the Merced County Association of Governments adopted VMT Guidelines due to geographic proximity and comparable regional context. The analysis evaluates VMT per capita under No Project and Plus Project conditions.

The VMT analysis compares project-generated VMT metrics to the Stanislaus County regional average. Consistent with statewide guidance published by the Governor's Office of Land Use and Climate Innovation, a significant impact would occur if the project's VMT per capita exceeds 15 percent below the Countywide average.

The analysis evaluates 2024 (existing baseline) and 2031 (buildout) conditions with and without the project. Under 2024 conditions without the project, the Countywide VMT per capita is 9.75, with a 15-percent-below-average threshold of 8.29. Patterson's VMT per capita under the same conditions is 14.52. With the project, the Countywide VMT per capita increases slightly to 9.90, with a threshold of 8.41.

Under 2031 buildout conditions without the project, the Countywide VMT per capita is 10.02, with a 15-percent-below-average threshold of 8.51. Patterson's VMT per capita under buildout conditions without the project is 14.95. With the project, the Countywide VMT per capita increases to 10.19, with a threshold of 8.67, and Patterson's VMT per capita rises to 16.65.

In both the 2024 baseline and 2031 buildout scenarios, the project's VMT per capita would exceed the 15-percent-below-Countywide-average threshold. Therefore, the project would result in a significant VMT impact.

The *Baldwin Ranch and Zacharias Master Plan Environmental Impact Report* includes the following mitigation measures requiring preparation of a transportation demand management program:

"MM TRANS-2a Prior to the approval of each map for the Zacharias Master Plan and Baldwin Master Plan, the applicant shall prepare plans for review and approval by the City of Patterson that identify the following applicable Transportation Demand Management Measures:

- A clearly designated pedestrian circulation network within the site that links to the City of Patterson roadway network;
- Secure bicycle parking in safe, strategic locations within the site; and
- Safety amenities such as lighting, sidewalks, and off-street pedestrian / bicycle paths."

"MM TRANS-2a Prior to the final approval for individual development projects that would employ more than 50 people that occur pursuant to the Zacharias Master Plan, the applicant shall retain a qualified transportation consultant to prepare a project-specific Transportation Demand Management Plan that includes the following applicable measures:

- Transit, bicycle, and pedestrian facilities;
- Alternative work schedules;
- Guaranteed ride home;
- Carpool or vanpool program;
- Commute assistance and ride-matching;
- Shuttle program / shuttle consortium / fund transit service;
- Transit passes or subsidies;
- Car share on-site;
- Self-Driving shuttle;
- Transportation Management Associations; and
- Telework."

Implementation of the following mitigation measure would reduce VMT impacts; however, it is highly unlikely that a transportation demand management program or trip reduction ordinance would reduce VMT to a less-than-significant level. Therefore, the significant impact would be unavoidable. The mitigation measure is required to reduce VMT impacts to the extent feasible and demonstrate the City's commitment to implementing all practicable measures consistent with CEQA Guidelines Section 15126.4.

Mitigation Measure (Sites 1A, 1B, and 2)

The City shall require the applicable transportation mitigation measures in the Master Plan EIR.

Mitigation Measure (Site 3-14)

TR-1 To reduce VMT impacts to the extent feasible, and prior to issuance of the first building permit associated with development at a housing opportunity site, the City shall adopt and implement a transportation demand management or trip reduction ordinance. The ordinance shall establish requirements and incentives for employers (if housing opportunity sites include uses other than residential), developers, and property owners to reduce single-occupancy vehicle trips and promote alternative transportation modes.

The program/ordinance could include:

a. Establish transportation demand management program requirements for new residential, commercial, and mixed-use developments that generate substantial vehicle trips, including preparation of a Transportation Demand Management Plan as part of the development review process;

b. Include performance standards such as minimum trip reduction or VMT reduction targets consistent with regional thresholds (e.g., 15 percent below the Countywide average);

c. Identify eligible trip reduction strategies, which may include but are not limited to:

   - Enhanced pedestrian and bicycle infrastructure connectivity;

- Provision of electric vehicle infrastructure in each garage;
- Provision of transit passes or subsidies;
- Carpool, vanpool, and rideshare incentive programs;
- Installation of bicycle parking, showers, and lockers;
- On-site amenities to reduce off-site trips (e.g., childcare, food service);
- Flexible work schedules or telecommuting policies for employers; and
- Shared mobility programs (e.g., carshare, bikeshare, e-scooters).

d. Require ongoing monitoring and reporting of program effectiveness, including periodic updates to City Council to ensure compliance and continual improvement; and

e. Coordinate implementation with the Stanislaus Council of Governments and neighboring jurisdictions to ensure regional consistency in transportation demand management standards and monitoring.

Implementation of this measure would reduce VMT impacts to the extent feasible; however, the impact would remain significant and unavoidable even with mitigation.

c. Development implementing the housing element, including new or modified roadway, bicycle, or pedestrian facilities, would be subject to and designed in accordance with City standards and specifications that address potential hazards (e.g., sight distance, driveway placement/spacing, and traffic control/signage), consistent with General Plan Policies T-1.1 and T-1.4 and Patterson Municipal Code Section 16.28.050 (General Regulations and Design). Any new transportation facilities or improvements would also follow current industry design standards and best practices and be reviewed through the City's zoning, building, and inspection processes. Therefore, the proposed project would not introduce design features that increase transportation hazards.

d. Development implementing the housing element would be analyzed for adequacy of emergency access when they are proposed. The City has adopted the 2022 California Fire Code and all site plans undergo Fire Department review to verify compliant fire apparatus access (e.g., width, turning radii, grade, surface, vertical clearance, signage/gates/Knox access) and water supply/hydrant placement per California Fire Code Sections 503 and 507, with secondary access required where warranted. Conditions of approval for a project may be required to ensure adequate fire and emergency access are in place before construction. Therefore, the proposed project would not result in inadequate emergency access.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources code section 5020.1(k), or	☐	☐	☐	☒
(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

Comments:

a. On September 3, 2024, the City distributed consultation letters to Native American tribes traditionally and culturally affiliated with the City of Patterson, inviting consultation pursuant to AB 52 and SB 18. No responses or requests for consultation were received within the statutory response periods. Refer to the impact analysis and mitigation measures in Section 5. Cultural Resources for potential impacts and mitigation measures to cultural and tribal cultural resources.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, single-dry and multiple- dry years?	☐	☒	☐	☐
c.	Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d.	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Comments:

a. The City of Patterson is currently served by existing infrastructure systems, including water, wastewater, stormwater drainage, electricity, natural gas, and telecommunications. Implementation of the proposed project would result in reasonably foreseeable development that would increase demand on these systems and may require new or expanded facilities.

Development of the Baldwin Ranch and Zacharias Master Plan areas would involve construction of new infrastructure—specifically potable water, wastewater, and stormwater drainage systems—to connect to the City's existing networks. In addition, electric power, natural gas, and telecommunication infrastructure would need to be extended to serve these areas. All other sites identified in the Housing Element update are infill locations situated in close proximity to existing infrastructure and are not anticipated to require construction of new facilities.

At this stage, it would be speculative to determine the specific impacts related to the construction of new or expanded infrastructure, as the need for such improvements will depend on the scope, location, and timing of future development. Any infrastructure improvements required for future development of housing opportunity sites would undergo project-level environmental and design review at the time specific development proposals are submitted. In addition, all projects would be required to comply with applicable fire and building code requirements, as well as City standards governing infrastructure and utility design. Therefore, potential impacts related to the construction and relocation of utilities for the proposed project are considered less than significant.

b. The City of Patterson's sole source of water supply is groundwater drawn from the Delta-Mendota Subbasin. The City operates five active production wells and two standby wells that collectively provide potable water to residential, commercial, industrial, and institutional users within City limits. According to Table 3-4 of the *City of Patterson Water Master Plan* (2018), land use duty factors, or water use factors, are assigned based on land use type. Residential land uses are assigned a water use factor of 3.1 acre-feet per acre per year. Applying this rate to all housing opportunity sites included in the Housing Element Site Inventory, which totals 597 acres, results in an estimated total annual water demand of approximately 1,851 acre-feet per year, equivalent to about 603.5 million gallons per year or 1.65 million gallons per day (mgd). This corresponds to an average of approximately 336 gallons per dwelling unit per day (or roughly 96 gallons per capita per day, assuming 3.5 persons per household), which is below the City's 2020 per-capita water use target of 164 gallons per capita per day, and is generally consistent with statewide water conservation objectives established under *California's Making Conservation a Way of Life* framework (California State Water Resources Control Board 2026).

While the *City of Patterson 2020 Urban Water Management Plan* (2021) finds that groundwater supplies from the Delta-Mendota Subbasin are sufficient to meet existing and projected water demands within the City through 2045 under normal, single-dry, and multiple-dry year conditions, that finding is based on a presumption that groundwater pumping is not restricted in the Delta-Mendota Subbasin. As discussed in Section 10, Hydrology and Water Quality, the City, as the GSA for its jurisdiction, adopted the 2024 consolidated GSP on November 19, 2024. The 2024 consolidated GSP includes a Pumping Reduction Plan that requires the reduction of groundwater pumping across the Subbasin in the amount of 42,000 acre-feet per year. In the City, as part of the Northern Delta Mendota Region of the Delta-Mendota Subbasin, groundwater pumping is required to be reduced by 460 acre-feet per year by 2030 from the City's model-estimated pumping for water years 2019-2023. With that reduction requirement in place, groundwater supplies from the Delta-Mendota Subbasin are not sufficient to meet projected water demands within the City through 2045 under normal, single-dry, and multiple-dry years without alternative water sources to offset new demand. Therefore, Site 1A, 1B, and 2 will be required to purchase alternative water supplies and recharge that water into the Subbasin to offset the additional groundwater demand from that new development. Refer to Section 10, Hydrology and Water Quality, for a full discussion of water supply and mitigation measures. Implementation of the mitigation measures identified in Section 10, checklist

question "b," would ensure adequate water supplies are available to serve the proposed project. Therefore, adequate water supplies are available to serve the proposed project.

c. The City provides wastewater collection, treatment, and disposal services to residential, commercial, industrial, and institutional uses within City limits. The City's Water Quality Control Facility (wastewater treatment plant) is located at 14901 Poplar Avenue and occupies approximately 240 acres. The facility has a design capacity of 2.45 mgd and currently treats approximately 1.8 mgd of wastewater on a daily basis (City of Patterson 2025a).

Table 5.5-3 of the General Plan EIR assigns average annual wastewater generation factors by development type. For residential uses, an average flow rate of 55 gallons per capita per day (gpd) is applied. Based on this rate, the proposed project, with an estimated population of 17,560 residents, would generate approximately 965,800 gpd (55 gpd × 17,560 persons = 965,800 gpd), equating to 0.967 mgd. Based on this finding, it can be assumed the City has adequate capacity to serve the proposed project.

The City is currently implementing an expansion project for the treatment plant to enhance overall treatment capacity and ensure that the facility can accommodate future wastewater demands associated with anticipated growth and development (City of Patterson 2025b). The expansion project includes upgrades to the influent pump station, headworks, operational systems and programs, and both the north and south treatment plants; installation of a membrane bioreactor superstructure; construction of sludge dewatering and drying infrastructure; and paving of access roads. Upon completion, the expansion will increase the plant's overall treatment capacity and ensure that all systems can meet higher flow requirements while maintaining effluent quality standards.

General Plan Policy PS-2.4 requires that new development pay its fair share of the costs associated with sewer system improvements through a combination of development impact fees and other funding mechanisms. As discussed under checklist question "a," development of the Baldwin Ranch and Zacharias Master Plan areas would involve construction of new wastewater infrastructure to serve those planned communities. According to the Baldwin Ranch and Zacharias Master Plan EIR, both master plan areas would develop sanitary sewer collection systems designed to connect to the City's existing trunk sewer network (City of Patterson 2020, pp. 3.15-22 and 3.15-23). These planned improvements, in conjunction with the treatment plant expansion, would ensure that the City's wastewater system maintains adequate capacity to serve existing and planned development under buildout conditions. Impacts are considered less than significant.

d. The City of Patterson is served by Bertolotti Disposal Company, which provides solid waste collection services (City of Patterson, Bertolotti Disposal, Inc. 2022). Waste generated by future development of the sites identified in the Housing Element would be collected and transported to the Fink Road Landfill, located at 4000 Fink Road in Crows Landing.

According to CalRecycle, the Fink Road Landfill has a permitted maximum daily capacity of 2,400 tons of solid waste and a remaining disposal capacity of approximately 18,993,322 tons as of June 2019 (CalRecycle 2025). Based on an estimated population increase of 17,560 residents, the proposed project is anticipated to generate approximately 110,628 pounds of solid waste per day—or about 20,187 tons annually—using a generation factor of 6.3 pounds of solid waste per person per day (CalRecycle 2024).

Given the remaining capacity at the Fink Road Landfill and the scale of projected waste generation, the proposed project would not generate solid waste in excess of state or local standards or exceed the capacity of existing solid waste infrastructure.

e. The Patterson Municipal Code ensures that future development complies with federal, state, and local solid waste management and reduction regulations through comprehensive requirements in Chapters 6.14 and 6.15:

- Chapter 6.14 – Construction and Demolition Debris Recycling mandates that all covered projects (as defined by the California Green Building Standards or demolition thresholds) submit a Waste Management Plan (WMP) prior to issuing permits (City of Patterson 2025c). This WMP must outline the estimated debris, the recyclable or reusable portion, and landfill-destined waste. Projects must divert at least 50 percent of construction and demolition debris by weight—or meet an approved infeasibility exemption—with documentation submitted before occupancy is granted. Violations can trigger civil penalties and certificate-of-occupancy holds.
- Chapter 6.15 – Mandatory Organic Waste Disposal ensures compliance with Senate Bill (SB) 1383. It requires all residential and commercial developments to properly manage organics—such as yard trimmings and food scraps—by directing them into green waste bins for composting (City of Patterson 2025d). This aligns with state greenhouse gas reduction goals.

Together, these chapters integrate state mandates—including CalGreen's Construction and Demolition diversion targets and SB 1383's organic recycling standards—into local permitting and enforcement mechanisms. Adherence to these City requirements would ensure that new construction and redevelopment projects effectively reduce and divert waste, in full alignment with applicable federal, state, and local regulations.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☐	☒
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Comments:

The housing opportunity sites are not located within a state responsibility area; however, Sites 2, 12, and 13 are located near local responsibility areas designated as moderate, high, and very high fire hazard severity zones, which generally extend in a northwest–southeast orientation along Interstate 5 in the western portion of Patterson (California Department of Forestry and Fire Protection 2024). The nearest state responsibility area with a very high fire hazards classification is approximately half a mile west of these sites (California Department of Forestry and Fire Protection 2024).

a. Development of the Housing Element sites would be subject to review by the City's Building and Fire Departments to confirm compliance with local ordinances and the California Building Code. Therefore, implementation of the Housing Element update would not impair or interfere with an adopted emergency response or evacuation plan.

b. The City of Patterson is characterized by relatively flat topography. As a result, development of the Housing Element sites would not exacerbate wildfire risk related to slope, prevailing winds, or other factors, nor would it expose future occupants to pollutant concentrations or hazards associated with the uncontrolled spread of wildfire.

c. Development of the Housing Element sites may include construction of supporting infrastructure such as roads, power lines, and utility connections. However, all future development would undergo design review at the time specific development proposals are submitted. In addition, all projects would be required to comply with applicable fire and building code requirements, as well as City standards governing infrastructure and utility design, which collectively ensure that new development does not increase fire hazards or related public safety risks.

d. As discussed under checklist question "b," Patterson is characterized by relatively flat topography. Therefore, development of Housing Element sites would not expose people or structures to risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

21. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a.	Does the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	☒	☐	☐	☐
c.	Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Comments:

a. As discussed in Section 4.0, Biological Resources, the proposed project has the potential to have the following substantial adverse effects:

- Potential impacts to one special-status plant species, big tarplant;
- Potential impacts to special-status wildlife species, including burrowing owl, California horned lark, Crotch's bumble bee, San Joaquin kit fox, Swainson's hawk, hoary bat, pallid bat, Townsend's big-eared bat, western red bat, and protected nesting birds;
- Potential loss of jurisdictional wetlands and waters; and
- Potential removal of trees.

Implementation of Mitigation Measures BIO-1 through BIO-10 would reduce these potential impacts to a less-than-significant level. Therefore, the proposed project would not substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species.

As discussed in Section 5.0, Cultural Resources, the proposed project has the potential to impact historic and/or unique archaeological resources. Implementation of Mitigation Measure CR-1 and CR-2, as well as applicable mitigation measures in the Master Plan EIR, would reduce potential impacts to a less-than-significant level. Therefore, the proposed project would not eliminate important examples of the major periods of California history.

b. Cumulative projects were evaluated in the General Plan EIR and Baldwin Ranch and Zacharias Master Plan EIR, which represent the environmental impacts of past projects, other current projects, and probable future projects. The proposed project would result in impacts in the following areas: visual impacts, conversion of important farmland, biological, cultural, energy, geology and soils, GHG, exposure to wildfire hazards, hydrology and water quality, land use planning, noise, population and housing, public services, recreation, VMT, construction of new or expanded utilities, sewer generation, and wildfire.

   The proposed project would, or have the potential to, result in construction-related impacts in the areas of air quality, biological resources, tribal and cultural resources, and paleontological resources. However, implementation of the mitigation measures presented in this initial study would ensure those impacts are less than significant and not cumulatively considerable.

   Of the impacts listed above, GHG and VMT generated by the proposed project would result in significant and unavoidable impacts while the rest are less than significant and not cumulatively considerable.

c. Based on the analysis provided in this initial study, the proposed project could indirectly cause substantial adverse effects to human beings through air quality and GHG emissions. As discussed throughout this initial study, air quality-related impacts would not be significant with mitigation, whereas, GHG-related impacts would be significant and unavoidable. Therefore, the proposed project would result in significant environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

E. SOURCES

Environmental Setting

Google Earth. 2025.

Project Description

City of Patterson. October 3, 2025. *City of Patterson 2023-2031 6th Cycle Housing Element Revised Draft.* Accessed on October 22, 2025. https://pattersonca.gov/DocumentCenter/View/13577/City_of_Patterson_Revised_Draft_6th_Cycle_Housing_Element_100325_sm1

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Aesthetics

California Department of Transportation (Caltrans). 2025. "California State Scenic Highway System Map." Accessed on August 29, 2025. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

City of Patterson. 2010. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Agriculture

California Department of Conservation. 2022. "Williamson Act Enrollment Finder." Accessed on June 3, 2025. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/

———. 2022. "Important Farmland Finder." Accessed on June 3, 2025. https://maps.conservation.ca.gov/dlrp/ciff/

City of Patterson. 2010. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Air Quality

Illingworth & Rodkin, Inc. 2025. *City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment.* PDF. Cotati, CA.

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Biological Resources

California Burrowing Owl Consortium (CBOC). 1993. *Burrowing Owl Survey Protocol and Mitigation Guidelines.*

California Department of Fish and Game (CDFG). 1994. *Staff Report regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California.*

California Department of Fish and Wildlife (CDFW). 2012. *Staff Report on Burrowing Owl Mitigation.* State of California Natural Resources Agency.

California Native Plant Society (CNPS). 2025. *Inventory of Rare and Endangered Plants of California* online database. Records of occurrence for Patterson, and surrounding 11 USGS quadrangles. Sacramento, California. Accessed October 2025. http://www.rareplants.cnps.org

California Department of Fish and Wildlife (CDFW). 2025a. *California Natural Diversity Database (CNDDB)* online database. Records of occurrence for Patterson, and surrounding 11 USGS quadrangles. Sacramento, California. Accessed OCtober 2025. https://wildlife.ca.gov/data/cnddb

CDFW. 2023b. *Biogeographic Information and Observation System (BIOS)* online database. Sacramento, California. Accessed October 2025. http://bios.dfg.ca.gov

CDFW. 2025c. *California Natural Community List.* Sacramento, California. Accessed October 2025.

CDFW. 2025d. *California Essential Habitat Connectivity Project.* Sacramento, California. Accessed October 2025. https://wildlife.ca.gov/Conservation/Planning/Connectivity/CEHC

City of Patterson. 2010. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

City of Patterson. 2025. "Patterson Municipal Code Chapter 12.16, Trees." Accessed October 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson12/Patterson1216.html#12.16

City of Patterson. 2025. "Patterson Municipal Code Chapter 18.78, Landscaping." Accessed October 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson18/Patterson1878.html#18.78.050

City of Patterson. October 3, 2025. *City of Patterson 2023-2031 6th Cycle Housing Element Revised Draft.* Accessed on October 22, 2025. https://pattersonca.gov/DocumentCenter/View/13577/City_of_Patterson_Revised_Draft_6th_Cycle_Housing_Element_100325_sm1

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

First Carbon Solutions. 2021. *Baldwin Ranch and Zacharias Master Plan Final Environmental Impact Report.* July 1, 2021. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Swainson's Hawk Technical Advisory Committee. 2000. *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley.*

U.S. Fish and Wildlife Service (USFWS). 2011. *Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior to or During Ground Disturbance.*

USFWS. 2025a. *Information for Planning and Research* online database. Official species list. Accessed October 2025. https://www.iapc.org/

USFWS. 2025b. *National Wetlands Inventory* online database. Washington, D.C. Accessed October 2025. http://www.fws.gov/wetlands/

USFWS. 2025c. *Critical Habitat for Threatened and Endangered Species* online mapper. Accessed October 2025. https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77

Cultural Resources

Central California Information Center. 2025. Records Search File No: 13203N

California Legislative Information. 2025. Health and Safety Code, Division 7. Accessed October 23, 2025. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=HSC&sectionNum=7050.5.

CEQA Guidelines. 2025. Accessed October 23, 2025. https://files.ceqanet.lci.ca.gov/276991-2/attachment/DV63UbMZVampQEotf5XoRMSclVBP-_NEZvwmA3OUcVCSmoLyU9PH4m2nfVy9vScUmmy1cTKYVRFqcuu20

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Energy

California Air Resources Board. EMFAC. Accessed on October 28, 2025. https://arb.ca.gov/emfac/scenario-analysis/generate-template

Illingworth & Rodkin, Inc. 2025. *City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment.* PDF. Cotati, CA.

Kittelson and Associates. 2025. City of Patterson Housing Element—Vehicle Miles Traveled (VMT) Impact Assessment Memorandum PDF.

Geology and Soils

California Department of Conservation. 2024. "Earthquake Zones of Required Investigation." Accessed June 3, 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/

City of Patterson. 2010. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

———. 2025a. "Patterson Municipal Code Chapter 16.68 Soil Reports." Accessed on June 3, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson16/Patterson1668.html#16.68

———. 2025b. "Patterson Municipal Code Chapter 16.72 Environmental Impact, Grading, and Erosion Control." Accessed on June 3, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson16/Patterson1672.html

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Google Earth. 2025.

Greenhouse Gas Emissions

Illingworth & Rodkin, Inc. 2025. *City of Patterson 2023-2031 Housing Element Update Air Quality & Greenhouse Gas Assessment.* PDF. Cotati, CA.

Hazards and Hazardous Materials

California Environmental Protection Agency. 2025.a "List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit (PDF)." Accessed on June 4, 2025. https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf

———. 2025b. "List of "active" CDO and CAO from Water Board (MS Excel, 1,453 KB)." Accessed on June 4, 2025.

———. 2025c. "List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC." Accessed on June 4, 2025. https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/

California Department of Forestry and Fire Protection (CALFIRE). 2024. "Fire Hazard Severity Zone Viewer." Accessed on June 4, 2025. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0

California Department of Toxic Substances Control. 2025. "Envirostor – Hazardous Waste and Substances Site List (Cortese)." Accessed on June 4, 2025. https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29

California State Water Resources Control Board. 2025. "List of Leaking Underground Storage Tank Sites." Accessed on June 4, 2025. https://geotracker.waterboards.ca.gov/search?CMD=search&case_number=&business_name=&main_street_name=&city=&zip=&county=&SITE_TYPE=LUFT&oilfield=&STATUS=&BRANCH=&MASTER_BASE=&Search=Search

City of Patterson. 2010. *City of Patterson 2010 General Plan*. Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

———. 2010. *City of Patterson 2010 General Plan Environmental Impact Report*. Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

County of Stanislaus. 2018. *Stanislaus County Airport Land Use Compatibility Plan*. Accessed on June 17, 2025. https://www.stancounty.com/planning/agenda-aluc/Revised06_04_2020.pdf

Google Earth. 2025.

Hydrology and Water Quality

California State Water Resources Control Board. 2024. "303(d) list of impaired waterbody pollutant combinations." Accessed on August 28, 2025. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html

City of Patterson. 2025a. "Patterson Municipal Code Chapter 13.32 Urban Storm Water Quality Management and Discharge Control." Accessed on August 28, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson13/Patterson1332.html#13.32.130

———. 2010. *City of Patterson 2010 General Plan*. Accessed on August 28, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

———. 2021. *City of Patterson 2020 Urban Water Management Plan*. Accessed on January 13, 2026. https://www.pattersonca.gov/669/Urban-Water-Management-Plan

———. 2025b. "Mandatory Outdoor Water Use Schedule." Accessed on October 23, 2025. https://www.pattersonca.gov/186/Mandatory-Watering-Schedule

———. 2025c. "Patterson Municipal Code Chapter 13.24 Water System." Accessed on October 23, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson13/Patterson1324.html#13.24

———. 2025d. "Patterson Municipal Code Chapter 15.48 Water-Efficient Landscape." Accessed on October 23, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson15/Patterson1548.html#15.48

California Regional Water Quality Control Board Central Valley Region. 2019. *Water Quality Control Plan (Basin Plan) for the Sacramento River Basin and the San Joaquin River Basin.* Accessed on October 23, 2025. https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_201902.pdf

Delta-Mendota Sustainable Groundwater Management Agency. 2024. *Final Delta-Mendota Subbasin Groundwater Sustainability Plan*. Accessed on January 13, 2026. https://deltamendota.org/final-gsp-documents/

EKI Environment & Water, Inc. 2024. *Northern Delta-Mendota Region Pumping Reduction Plan*. https://www.stancounty.com/er/groundwater/pdf/Northern-Delta-Mendota-Region-Pumping-Reduction-Plan.pdf

Federal Emergency Management Agency (FEMA). 2026. FEMA Flood Map Service Center. Accessed January 21, 2026. https://msc.fema.gov/portal/search?AddressQuery=Patterson%2C%20California

Land Use and Planning

City of Patterson. 2010. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

Mineral Resources

City of Patterson. 2010. *City of Patterson 2010 General Plan Environmental Impact Report.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Noise

City of Patterson. 2025. "Patterson Municipal Code Chapter 6.44 Noise Control." Accessed on June 17, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson06/Patterson0644.html#6.44.090

———. 2010. *City of Patterson 2010 General Plan.* Accessed on June 17, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

County of Stanislaus. 2018. *Stanislaus County Airport Land Use Compatibility Plan.* Accessed on June 17, 2025. https://www.stancounty.com/planning/agenda-aluc/Revised06_04_2020.pdf

Public Services

City of Patterson. 2025a. "Fire Department." Accessed on June 6, 2025. https://www.pattersonca.gov/352/About-Us

———. 2025b. "Patterson Municipal Code Chapter 3.64 New Development Impact Fees." Accessed on June 6, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson03/Patterson0364.html#3.64

———. 2025c. "Police Department." Accessed on June 6, 2025. https://www.pattersonca.gov/199/Police-Department

———. 2010a. *City of Patterson 2010 General Plan.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

———. 2010b. *City of Patterson 2010 General Plan Environmental Impact Report.* Accessed on June 3, 2025. https://www.pattersonca.gov/145/General-PlanCity-Maps

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Patterson Joint Unified School District. 2025. *Student Population Forecast by Residence School Year 2024/25 – 2031/32 Report.* PDF.

Stanislaus County Sheriff's Office. 2025. "Patterson Police Services." Accessed on June 6, 2025. https://www.scsdonline.com/field-services/contract-cities/patterson

Transportation

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Kittelson and Associates. 2025. City of Patterson Housing Element—Vehicle Miles Traveled (VMT) Impact Assessment Memorandum PDF.

Utilities and Service Systems

California State Water Resources Control Board. 2026. Water Conservation Portal. *Making Conservation a California Way of Life Regulation.* Accessed on January 21, 2026. v https://www.waterboards.ca.gov/conservation/regs/water_efficiency_legislation.html

CalRecycle. 2025. "SWIS Facility/Site Activity Details: Fink Road Landfill (50-AA-0001)." Accessed on June 17, 2025. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/992?siteID=3733

———. 2024. "Disposal Rate Calculator." Accessed on June 17, 2025. https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator

City of Patterson. 2018. *City of Patterson Water Master Plan.* Accessed on October 22, 2025. https://www.pattersonca.gov/DocumentCenter/View/4174/Patterson-WMP-Final-12March18_with-Appendices?bidId=

———. 2021. *City of Patterson 2020 Urban Water Management Plan.* Accessed on October 22, 2024. https://www.pattersonca.gov/DocumentCenter/View/6497/Jacques-DeBra---City-of-Patterson-Draft-2020-UWMP_Chapters-1-10-3-25-21

———. 2025a. "Water Quality Control Facility." Accessed on October 22, 2025. https://pattersonca.gov/201/Water-Quality-Control-Facility

———. 2025b. "City of Patterson Breaks Ground on Largest Infrastructure Improvement Project in City's History." Accessed on October 22, 2025. https://www.pattersonca.gov/m/newsflash/home/detail/555#:~:text=PRESS%20RELEASE%20%2D%20City%20Breaks%20Ground%20on%20Largest%20Infrastructure%20Improvement%20Project,Sludge%20Treatment%20System%20(SASTS).

———. 2022. Berlotti Disposal, Inc. "Franchise Agreement." Accessed on June 17, 2025. https://www.pattersonca.gov/DocumentCenter/View/12191/Fully-Executed-Extension-Agreement-2022-PDF

———. 2025c. "Patterson Municipal Code Chapter 6.14 Construction and Demolition Debris Recycling Program." Accessed on June 17, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson06/Patterson0614.html

———. 2025d. "Patterson Municipal Code Chapter 6.15 Mandatory Organic Waste Disposal Reduction Ordinance." Accessed on June 17, 2025. https://www.codepublishing.com/CA/Patterson/#!/Patterson06/Patterson0615.html

First Carbon Solutions. 2020. *Baldwin Ranch and Zacharias Master Plan Draft Environmental Impact Report.* December 3, 2020. https://www.pattersonca.gov/658/Master-Plan-EIR-Documents

Wildfire

California Department of Forestry and Fire Protection (CALFIRE). 2024. "Fire Hazard Severity Zone Viewer." Accessed on June 4, 2025. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0