



July 11, 2026

Michael Hren
Principal Planner
City of Modesto Planning Division
1010 Tenth Street
Modesto, CA 95354

Re: Notice of Preparation for the Modesto 2050 General Plan Environmental Impact Report

Dear Mr. Hren,

As requested by the City, the League of Women Voters of Stanislaus County submits the following comments on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Modesto 2050 General Plan. We respectfully request that these comments be incorporated into the scope of the EIR and that the City provide written responses explaining how each issue will be addressed during the environmental review process.

Agricultural Land Conversion

Although this is a program-level planning effort and does not approve specific development projects, inclusion of agricultural land within future growth areas has significant long-term consequences. Lands designated for urban development often cease to function as viable agricultural resources long before construction occurs. The EIR should analyze the direct, indirect, and cumulative impacts of converting productive farmland to urban uses, including loss of agricultural land, reduced agricultural viability, impacts on groundwater recharge, and effects on Stanislaus County's agricultural economy.

Water Resources and Hydrology

The NOP identifies "hydrology" as a study area but does not clearly define its scope. The EIR should address water supply reliability, groundwater impacts, groundwater recharge

areas, consistency with the Sustainable Groundwater Management Act (SGMA), and the ability of water providers to serve future growth without adversely affecting existing agricultural users.

Traffic and Circulation

Regional traffic impacts warrant particular attention. State Route 99 already experiences significant congestion and capacity constraints. The EIR should evaluate whether the regional transportation network can accommodate anticipated population growth and identify feasible mitigation measures where significant impacts are anticipated.

Economic Development Lands

The EIR should examine whether lands designated for economic development are likely to remain in employment-generating uses over time. Past conversions of lands designated for business park and industrial uses to residential and commercial development suggest that long-term land use assumptions should be carefully evaluated, as such changes may alter the environmental impacts analyzed in the EIR.

Cumulative Impacts

The EIR should evaluate the cumulative impacts of the entire General Plan, not only newly added growth areas. Analysis should include the combined effects of planned growth in Modesto, Ceres, Riverbank, Salida, and Del Rio on traffic, air quality, greenhouse gas emissions, groundwater resources, agricultural lands, and regional infrastructure. The environmental effects of the General Plan cannot be fully understood without considering the cumulative impacts of growth occurring throughout the surrounding region.

Alternatives

In addition to the required No Project Alternative, the EIR should analyze a Reduced Expansion Alternative and an Infill/Redevelopment Alternative that emphasizes higher densities, redevelopment, and more efficient use of existing urban land. These alternatives could reduce farmland conversion and infrastructure demands while meeting the City's objectives.

Thank you for the opportunity to comment on the Notice of Preparation. We look forward to the City's responses to the issues raised in this letter and reviewing the EIR.

Sincerely,

A handwritten signature in black ink that reads "amy wolfe". The signature is written in a cursive, lowercase style.

Amy Wolfe, President
League of Women Voters of Stanislaus County