

Bonadelle Neighborhoods
RO302 / GPA2020-001 / R2020-001 / TM6304
Initial Study and Mitigated Negative Declaration

June 2020

PREPARED BY:

Ricky Caperton, AICP
Senior Planner
Planning & Development Services
(559) 324-2347
rcaperton@cityofclovis.com



CITY *of* **CLOVIS**

PLANNING & DEVELOPMENT
1033 FIFTH STREET • CLOVIS, CA 93612

INITIAL STUDY

This Initial Study was prepared pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Sections 21000 *et seq.*, CEQA Guidelines Title 14, Section 15000 *et seq.* of the California Code of Regulations.

PROJECT TITLE:	Bonadelle Neighborhoods RO302/GPA2020-001/R2020-001/TM6304
LEAD AGENCY NAME AND ADDRESS:	City of Clovis Planning & Development Services 1033 Fifth Street Clovis, CA 93612
CONTACT PERSON AND PHONE NUMBER:	Ricky Caperton, AICP, Senior Planer (559) 324-2347 rcaperton@cityofclovis.com
PROJECT LOCATION:	SE near Leonard and Barstow Avenues Clovis, CA 93619 APN(s): 554-052-10
PROJECT SPONSOR'S NAME AND ADDRESS:	John A. Bonadelle Bonadelle Neighborhoods 7030 N. Fruit Ave., #101 Fresno, CA 93711
LAND USE DESIGNATION:	See page 9 of this Initial Study.
ZONING DESIGNATION:	See page 9 of this Initial Study.
PROJECT DESCRIPTION	See page 7 of this Initial Study.
SURROUNDING LAND USES AND SETTING:	See page 6 of this Initial Study.
REQUIRED APPROVALS:	See page 9 of this Initial Study.
HAVE CALIFORNIA NATIVE AMERICAN TRIBES REQUESTED CONSULTATION? IF SO, HAS CONSULTATION BEGUN?	Yes

TABLE OF CONTENTS

A. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED5

B. PROJECT OVERVIEW6

C. PROJECT LOCATION6

D. EXISTING SETTING6

 1. Existing Conditions6

 2. Surrounding Conditions6

 3. Land Use Designation9

 4. Zoning Designation9

E. PROJECT DESCRIPTION9

 1. Project Construction9

 2. Site Preparation9

 3. Project Components9

F. REQUIRED PROJECT APPROVALS 15

G. TECHNICAL STUDIES 15

H. ENVIRONMENTAL CHECKLIST 16

 1. Aesthetics 16

 2. Agriculture and Forestry Resources 18

 3. Air Quality 20

 4. Biological Resources 25

 5. Cultural Resources 29

 6. Energy 31

 7. Geology and Soils 32

 8. Greenhouse Gas Emissions 35

 9. Hazards and Hazardous Materials 38

 10. Hydrology and Water Quality 41

 11. Land Use and Planning 46

 12. Mineral Resources 47

 13. Noise 48

 14. Population and Housing 50

 15. Public Services 51

 16. Recreation 53

 17. Transportation 55

 18. Tribal Cultural Resources 60

 19. Utilities and Service Systems 63

 20. Wildfire 65

 21. Mandatory Findings of Significance 67

I. REPORT PREPARATION 69

LIST OF FIGURES

FIGURE 1: PROJECT LOCATION 7
FIGURE 2: AERIAL OF PROJECT LOCATION..... 8
FIGURE 3: GENERAL PLAN LAND USE DESIGNATION 10
FIGURE 4: ZONING DISTRICT 11
FIGURE 5: PROPOSED TRACT MAP 6304..... 13

LIST OF TABLES

TABLE 1: SURROUNDING LAND USES 6
TABLE 2: PROPOSED R-1-PRD DEVELOPMENT STANDARDS 12
TABLE 3: AMBIENT AIR QUALITY STANDARDS..... 23

A. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, as indicated by the checklist and corresponding discussion in this Initial Study.

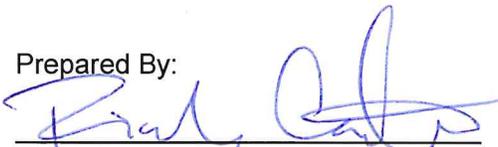
- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Transportation | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities & Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

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 proponents. 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 (EIR) will be prepared.
- I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

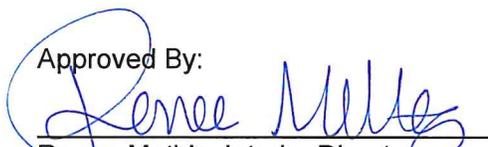
Prepared By:



Ricky Caperton, AICP, Senior Planner
 City of Clovis Planning & Development Services

6-3-2020
 Date

Approved By:



Renee Mathis, Interim Director
 City of Clovis Planning & Development Services

6/3/2020
 Date

B. PROJECT OVERVIEW

Bonadelle Neighborhoods (“Applicant”) proposes the construction of 217 single-family homes and associated site improvements (i.e. landscape, parking, sidewalks, and utilities infrastructure) on approximately 34 acres of vacant and undeveloped land near the southeast corner of Leonard and Barstow Avenues currently in the County of Fresno, California, herein referred to throughout the document as “proposed Project” and/or “Project.” It is important to note that the overall total Project area is approximately 52 acres; however, the Project itself would occupy a 34-acre portion of the total acreage. The remaining approximately 18 acres would not include development as part of this Project, although would be rezoned and annexed as part of the Project.

The Project includes a request for annexation into the City of Clovis city limit, a general plan amendment, rezone, and vesting tentative tract map, which are described in more detail below.

C. PROJECT LOCATION

As shown in Figure 1 below, the Project is located southeast of Leonard and Barstow Avenues, west of Highland Avenue (Assessor’s Parcel Number (APN) 554-052-10). As shown in Figure 1, the Project area is bisected by Dog Creek. The Project site is currently outside of the Clovis city limit, although it is within the City’s sphere of influence (SOI).

D. EXISTING SETTING

This section describes the existing conditions, surrounding conditions, as well as the General Plan land use and zoning designations.

1. EXISTING CONDITIONS

As shown in Figure 2 below, the existing site is vacant and undeveloped, consisting primarily of low-lying vegetation, grasses, shrubs, and weeds. The site is generally flat, and is bounded by existing rural residential to the east, vacant land used for agricultural to the south, a subdivision under construction to the west, as well as Dog Creek and rural residential also to the west. The overall Project area is also adjacent to the Enterprise Canal, which is situated north of the greater Project area. As a vacant site, there is currently no pedestrian, circulation, and/or utility infrastructure.

2. SURROUNDING CONDITIONS

As shown reference in Table 1 below, and shown on Figure 2, the Project site is surrounded by a mix of existing rural residential, newer residential, and residential currently under construction. Areas to the north, west, and south are within the City limit, and the Project site and the area to the east are currently within the County of Fresno jurisdiction. Although the property immediately south of the Project site is currently used for agricultural purposes, it is important to note that there is a previously approved tentative tract map and that site is planned for low density residential.

Table 1: Surrounding Land Uses

	Land Use Designation	Zoning*	Existing Land Use
North	Low Density Residential	R-1	Single Family Residential (under construction)
East	Rural Residential (Fresno County)	R-R	Rural Residential (Fresno County)
South	Low Density Residential	R-1	Undeveloped (Ag use)
West	Medium Density Residential	R-1	Single Family Residential (under construction)
*R-1 (Single-Family Residential – 6,000 square feet) R-R (Rural Residential) (County of Fresno)			

Figure 1: Project Location

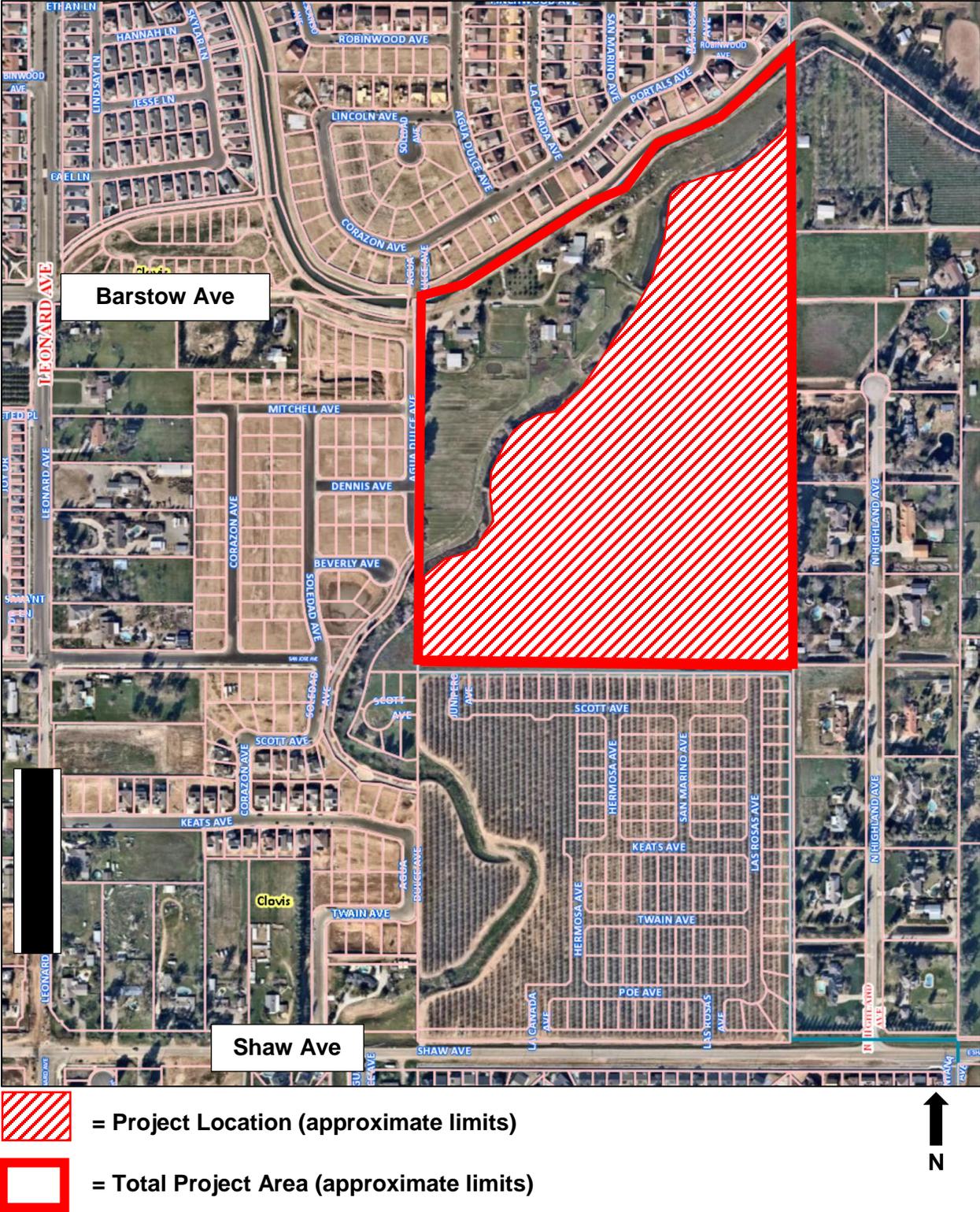
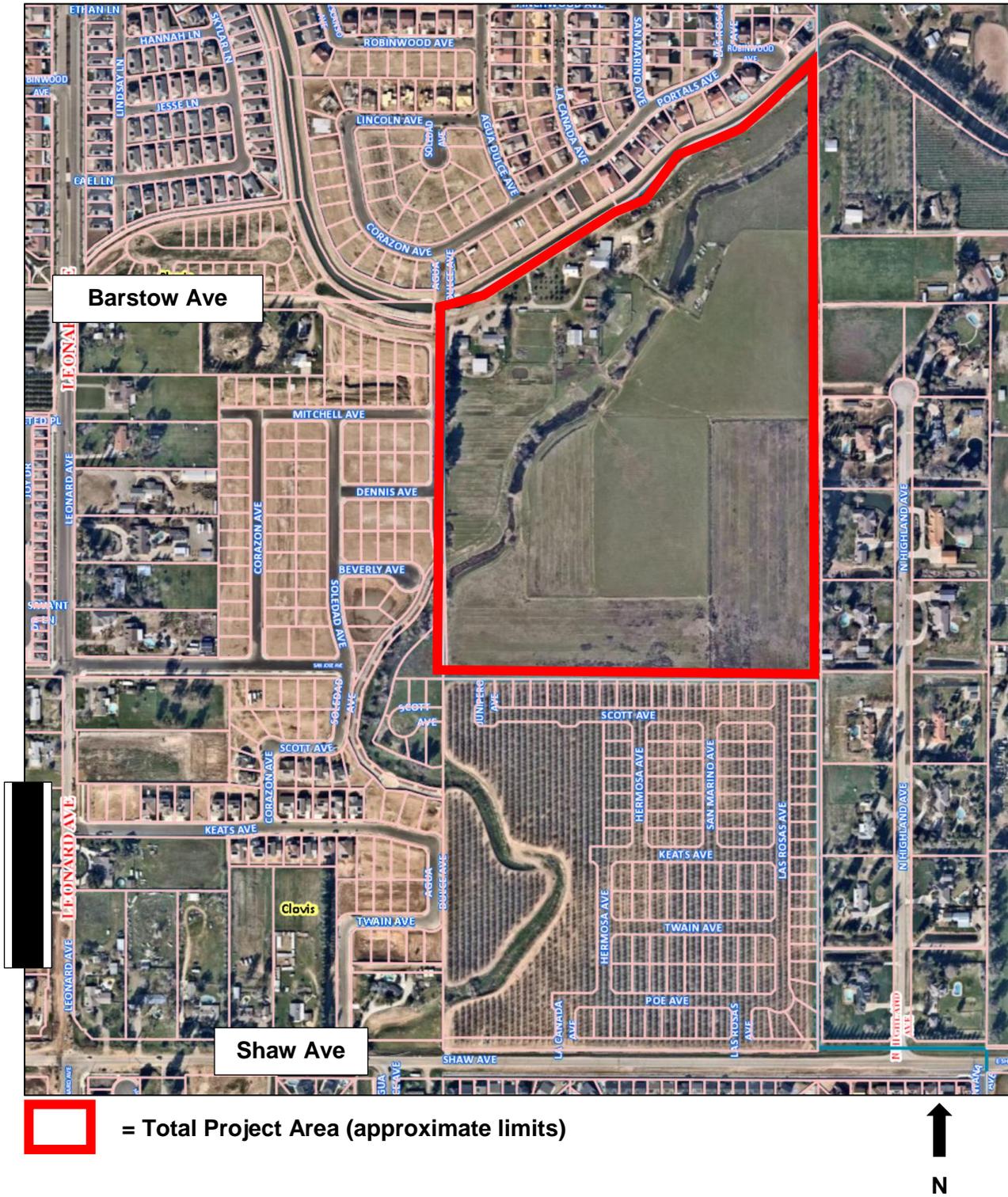


Figure 2: Aerial of Project Location



3. LAND USE DESIGNATION

As shown on Figure 3, the Project site has an existing General Plan land use designation of Low Density Residential, which allows for a density range of 2.1 to 4.0 dwelling units per acre (DU/Ac). The other remaining portion of the total Project area is designated as Park and Open Space. Those areas would not result in a change in land use designation.

According to the 2014 Clovis General Plan, the Low Density land use designation is intended for conventional single family detached houses.¹ As part of the Project, the Applicant is seeking a request to approve a general plan amendment to the Medium Density Residential land use designation, which is intended for detached and attached single family homes, patio homes, or zero lot line homes. The Medium Density Residential designation allows for a density range of 4.1 to 7.0 DU/Ac.

4. ZONING DESIGNATION

As shown on Figure 4, the Project site is currently within the County of Fresno jurisdiction and has a zoning designation of AE20 (Exclusive Agricultural District). As part of the Project, the Applicant requests a pre-zone of approximately 34 acres to the R-1-PRD (Single-Family Planned Residential Development) zone district as part of the annexation request, and the remaining approximately 18 acres to the Open Space zone district.

The R-1-PRD zone district allows for a density range between 4.1 and 15.0 DU/Ac; however, the Applicant is requesting a Medium Density Residential land use designation which would only allow for a density range of 4.1 to 7.0 DU/Ac. The Project proposes a density of approximately 6.50 DU/Ac. The 18 acre portion that would be rezoned to Open Space is to bring the remaining portion into consistency with the General Plan land use designations on that portion west of Dog Creek.

E. PROJECT DESCRIPTION

This section describes the components of the proposed Project in more detail, including site preparation, proposed structures, and on- and off-site improvements.

1. PROJECT CONSTRUCTION

The Project is anticipated to begin construction late 2020 or early 2021, and would commence over two phases with full buildout by 2024/2025. However, first occupancy is assumed to occur by the end of 2021 or early 2022. These timelines are expected; however, are only estimates and depend on other factors such as market and demand.

2. SITE PREPARATION

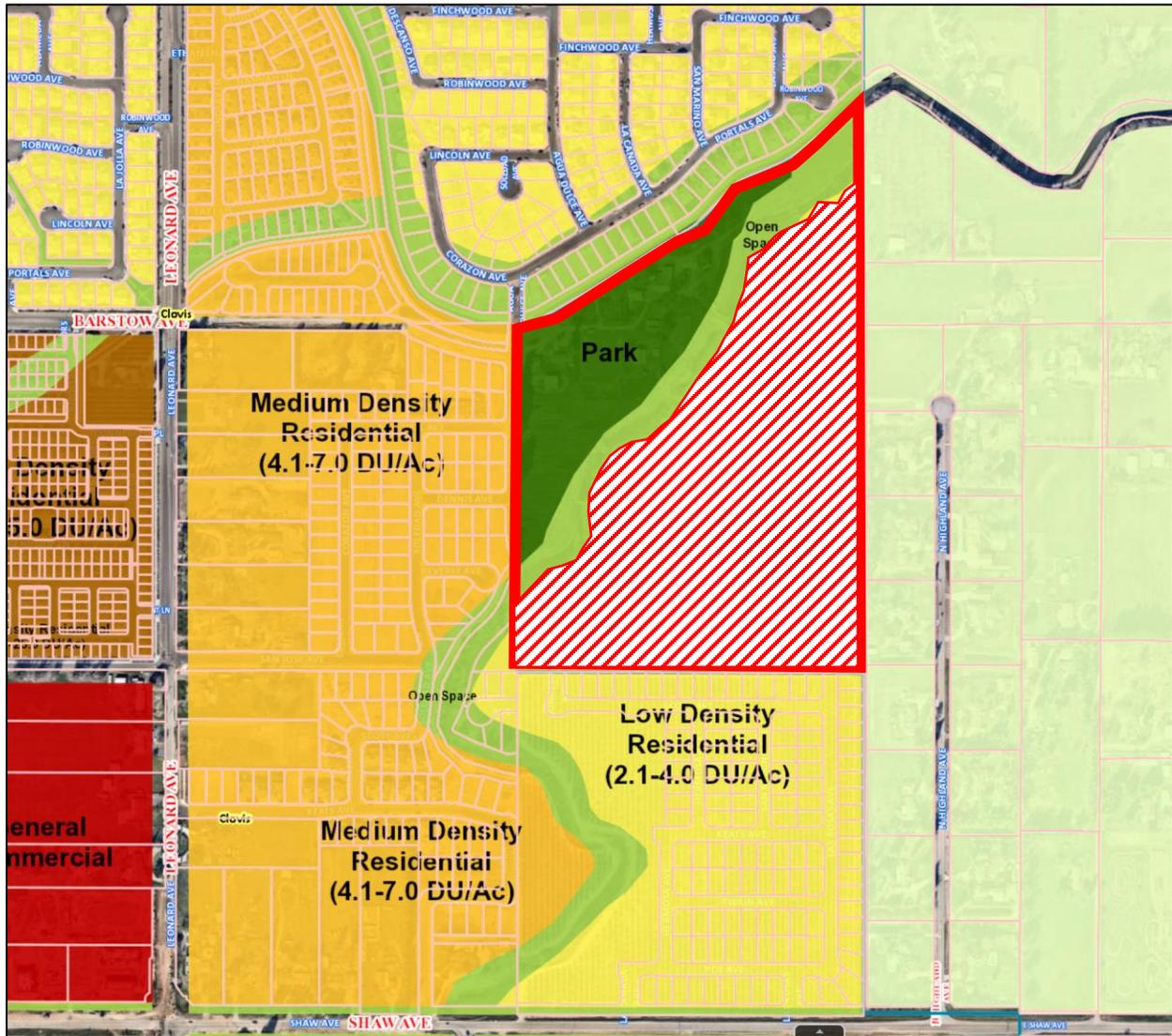
Site preparation would include typical grading activities to ensure a relatively flat surface. Part of the preparation would include the removal of any vegetation, such as grasses, shrubs, and weeds. Any trees would need to be removed. Other site preparation activities would include minor excavation for the installation of utility infrastructure, for conveyance of water, sewer, stormwater, and irrigation. There are no existing structures on the Project site, therefore, there would be no demolition of structures as part of the Project.

3. PROJECT COMPONENTS

This section describes the overall components of the Project, such as the proposed buildings, landscape, vehicle and pedestrian circulation, and utilities.

¹ 2014 City of Clovis General Plan, Land Use Element, Table LU-2, Land Use Designations, page LU-10. August 2014.

Figure 3: General Plan Land Use Designation



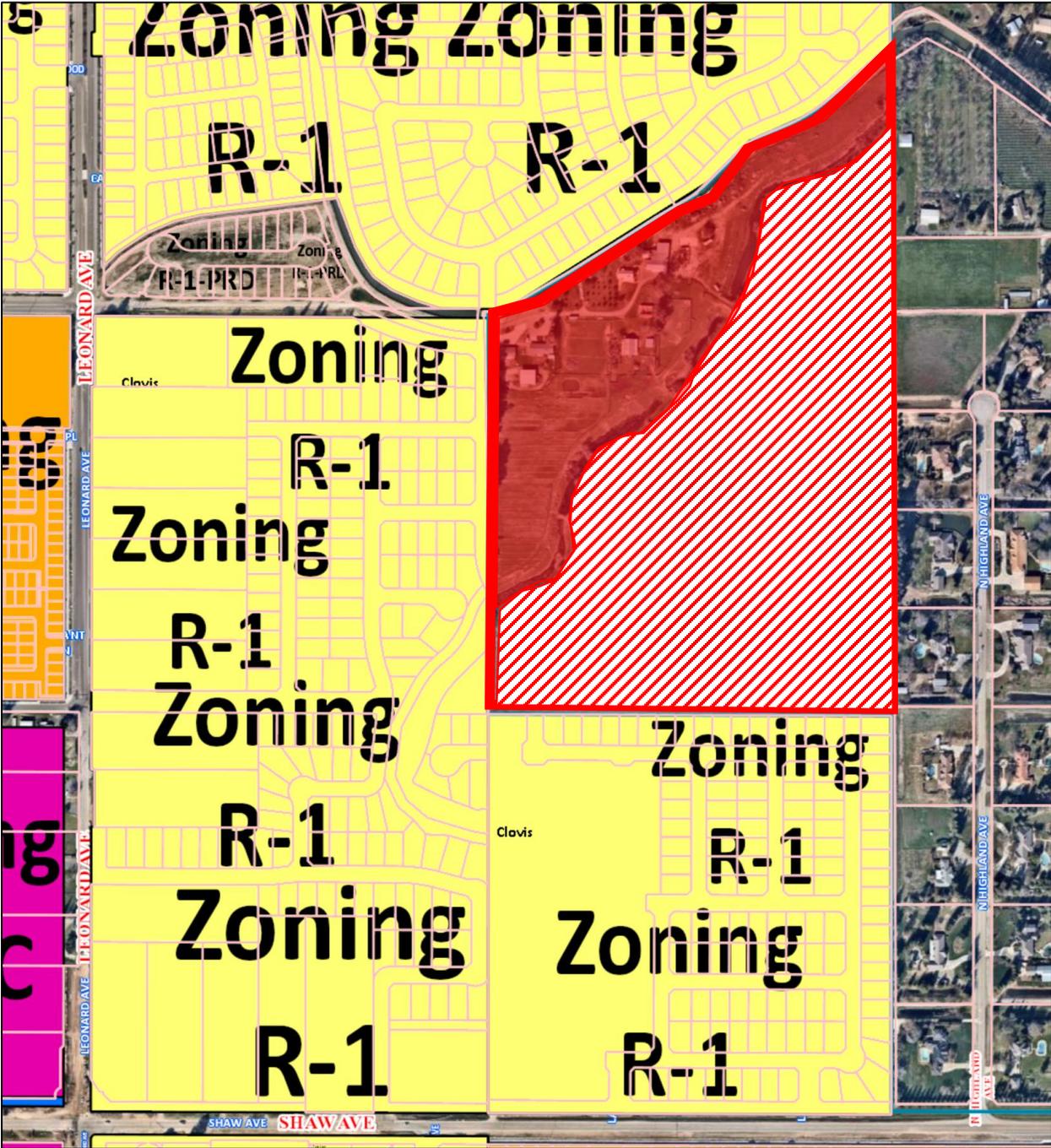
= Total Project Area (approximate limits)



= Low Density (2.1 to 4.0 DU/Ac) to Medium Density (4.1 to 7.0 DU/Ac)



Figure 4: Zoning District



-  = Total Project Area (approximate limits)
-  = County AE20 to R-1-PRD (City)
-  = County AE20 to Open Space (City)



DEMOLITION

As mentioned above under the “Site Preparation” section, there are no existing structures on the Project site, therefore, no demolition would occur. However, there would be site preparation, such as grading and clearing of vegetation.

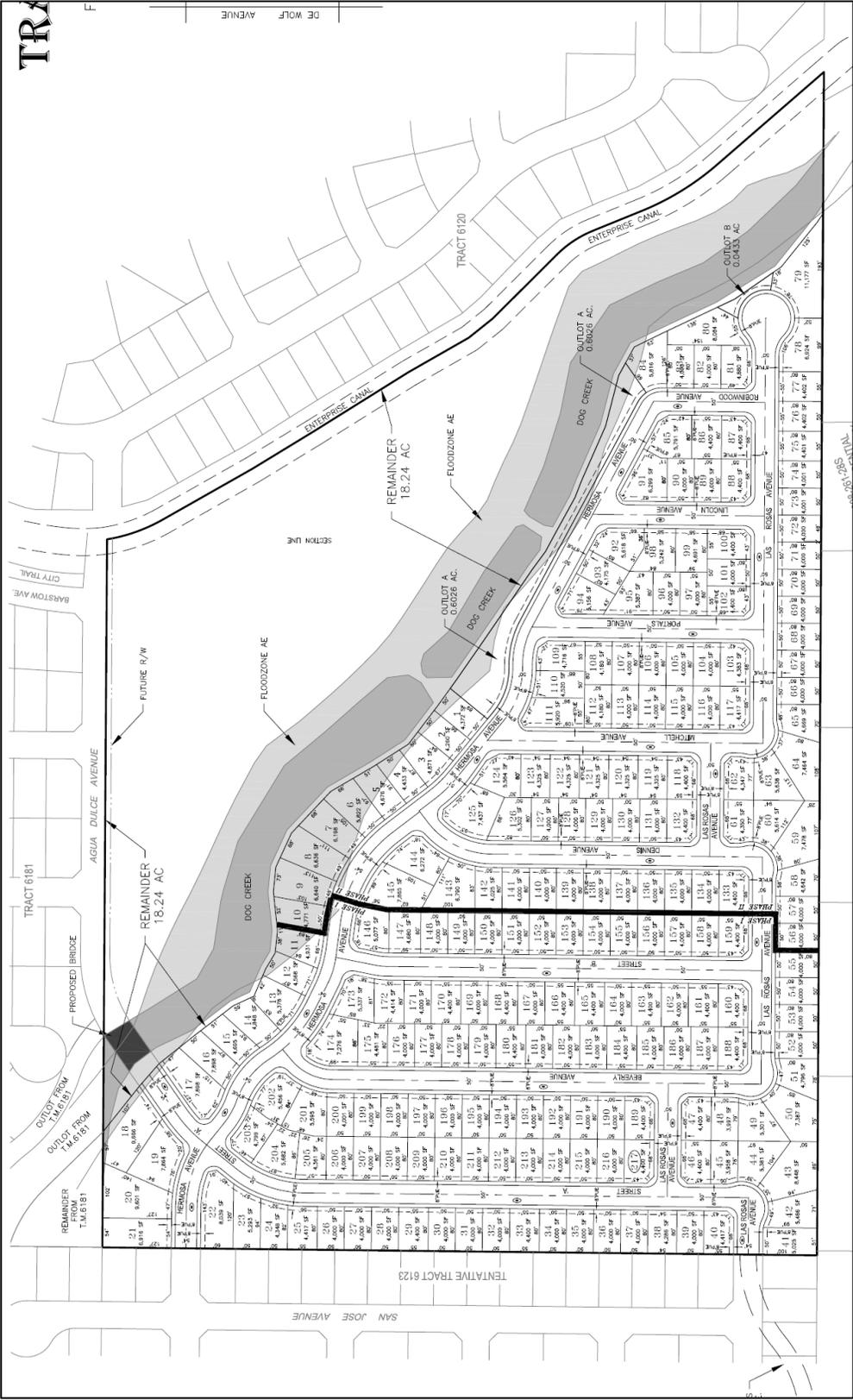
DEVELOPMENT STANDARDS

As shown in Figure 5, the Project proposes 217 single-family residential lots ranging in sizes from approximately 4,000 square-feet to 11,177 square-feet, with an average lot size of approximately 4,700 square-feet. As part of the pre-zone request to the R-1-PRD zone district, Chapter 9.66, Planned Development Permits, of the Clovis Municipal Code (CMC or Code) provides a method whereby land may be designed and developed taking advantage of modern site planning techniques resulting in a more efficient use of land and better living environment than otherwise possible through strict application of the development standards. In general, this section of the Code provides a mechanism to afford some relief to typical development standards. As such, the Applicant proposes the development standards shown in Table 2, Proposed R-1-PRD Development Standards. As part of the R-1-PRD, the Applicant would be required to submit for a Residential Site Plan Review (RSPR) to ensure the final design of the homes conform to the development standards, as well as other design standards that may apply.

Table 2: Proposed R-1-PRD Development Standards

Development Standard	Proposed Standard
Lot Area (minimum)	4,000 square feet
Lot Width (minimum)	50 feet
Lot Depth (minimum)	80 feet
Lot Coverage (maximum)	65%
Height (maximum)	35 feet
Curved, Cul-de-sac, or Corner Lot	35 feet frontage 80 feet depth
Front Yard Setback (minimum)	18 feet to garage 8 feet to living area, porch, or projections
Side Yard Setback (minimum)	5 feet one side 3 feet other side
Corner / Reversed Corner (minimum)	8 feet
Rear Yard (minimum)	5 feet
Garage (minimum)	10 feet x 20 feet for 1-car 20 feet x 20 feet for 2-car
Street Width	50 foot (36 feet curb to curb) <u>and</u> 54 foot (40 feet curb-to-curb)
Parking (minimum)	2 covered spaces per unit
Walls/Fences (minimum height) / (maximum height)	6 feet / 8 feet
Trellises (maximum height)	12 feet
Covered Structures / Accessory Structures (maximum height)	12 feet
NOTE: The Applicant has agreed to restrict lots 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, and 71 to single-story homes.	

Figure 5: Proposed Tract Map 6304



SITE CIRCULATION AND PARKING

The Project would be a non-gated community with public roadways. As shown in Figure 5, the Project includes a drive aisles between 50 feet and 54 feet in right-of-way (ROW) width which results in a curb-to-curb width of 36 feet and 40 feet, respectively. The full ROW width includes the width of the road (curb-to-curb) as well as a 7 foot sidewalk width on both sides of the street. For example, a 54 foot ROW roadway includes a 40 foot drive aisle (i.e. two 20-foot travel lanes) and 14 feet of sidewalk (i.e. 7 foot sidewalk on each side of the road).

The Project site would be accessed via two points of entry; however, would ultimately result in three (3) points of access when the property to the south develops. The primary ingress and egress would be via a bridge spanning Dog Creek from Agua Dulce Avenue that would be constructed as part of the Project. Agua Dulce Avenue is accessed via Barstow Avenue. The second point of access would occur through the south end of the site along a temporary roadway (Las Rosas Avenue) connecting to Shaw Avenue that would also be constructed as part of the Project. Upon development of the parcel south of the Project site, this temporary access would be modified/completed to its ultimate alignment, along with another access point at Hermosa Avenue. At full buildout of the proposed Project and the project south of the site (to be completed by others not part of the proposed Project), a total of three (3) points of access would be completed.

The Project includes the construction of approximately 217 single-family homes each with two-car garages. The homes would also include standard sized driveways which would also provide areas for additional uncovered parking. Although not counted as part of meeting City parking requirements, the roadways do provide sufficient space for parking along the street.

Pedestrian circulation would be provided through a network of paved walking paths throughout the site. Sidewalks would be constructed on both sides of the street and would consist of the typical width sidewalk, consistent with City sidewalk standards.

PROJECT DESIGN

It is important to note that at this stage of the process, conceptual home designs have not yet been completed. However, as part of the Project, an RSPR would be required to ensure that the design of the homes conform to the proposed standards as part of the R-1-PRD requested by the Applicant, as well as any design considerations required under the Loma Vista Specific Plan. The overall footprint, height limit, and placement of the structures would comply with the approved R-1-PRD standards; however, the color palette and design details are subject to slightly change throughout the Residential Site Plan Review RSPR. Generally speaking, the requested maximum height and setbacks are consistent with the allowable residential height limit and setbacks of residentially zoned property throughout the City of Clovis.

LANDSCAPE

The Project would include landscape throughout the site. Typically, landscaped areas would include the front yards of each home, as well as any park or open space areas part of the Project. Landscape plans are typically provided at a later date at which time the proposed landscape plans would be reviewed for compliance with the City's water efficient landscape regulations and guidelines, as well as planting palette and plant and tree locations.

UTILITIES

Utilities for the site would consist of water, sewer, electric, cable, gas, and stormwater infrastructure. Minor trenching and digging activities would be required for the installation of necessary pipelines typical of residential development. All utility plans would be required to be reviewed and approved by the appropriate agency, and/or department to ensure that installation occurs to pertinent codes and regulations.

Utilities are provided by and managed from a combination of agencies, including FID which provides the City's water supply, Fresno Metropolitan Flood Control District (FMFCD) which has responsibility for storm water management, and the City's public utilities department which provides for solid waste collection, and sewer collection services. Pacific Gas & Electric (PG&E) provides electricity and natural gas within the City of Clovis.

F. REQUIRED PROJECT APPROVALS

The City of Clovis requires the following review, permits, and/or approvals for the proposed Project; however, other approvals not listed below may be required as identified throughout the entitlement process:

- Annexation
- General Plan Amendment
- Vesting Tentative Tract Map
- Prezone
- Residential Site Plan Review
- Grading Permit
- Building Permit
- San Joaquin Unified Air Pollution Control District
- Fresno Metropolitan Flood Control District

G. TECHNICAL STUDIES

The analysis of the Project throughout this Initial Study relied in part on the technical studies listed below prepared for the Project, as well as other sources, including, but not limited to, the 2014 Clovis General Plan Environmental Impact Report (EIR), departmental staff, California Department of Conservation, and the California Department of Toxic Control Substances.

- **Appendix A:** Air Quality and Greenhouse Gas Analysis Report, March 5, 2020
- **Appendix B:** Biological Habitat Assessment, February 20, 2020
- **Appendix C:** Cultural Resources Assessment, February 14, 2020
- **Appendix D:** Traffic Impact Analysis, May 26, 2020

H. ENVIRONMENTAL CHECKLIST

This section provides an evaluation of the potential environmental impacts of the proposed project and are based on CEQA Guidelines Appendix G. For each issue area, one of four conclusions is made:

- **No Impact:** No project-related impact to the environment would occur with project development.
- **Less Than Significant Impact:** The proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.
- **Less Than Significant with Mitigation Incorporated:** The proposed project would result in an environmental impact or effect that is potentially significant, but the incorporation of mitigation measure(s) would reduce the project-related impact to a less than significant level.
- **Potentially Significant Impact:** The proposed project would result in an environmental impact or effect that is potentially significant, and no mitigation can be identified that would reduce the impact to a less than significant level.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial effect on a scenic vista?			X	
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?			X	

ENVIRONMENTAL SETTING

The City of Clovis is located within the San Joaquin Valley. Thus, much of the City and its surrounding areas are predominately flat. As a result, on clear days, the Sierra Nevada Mountains are visible to the east depending on your location.

Aside from Sierra Nevada, there are no officially designated focal points or viewsheds within the City. However, Policy 2.3, Visual Resources, of the Open Space Element of the 2014 Clovis General Plan, requires maintaining public views of open spaces, parks, and natural features and to preserve Clovis' viewshed of the surrounding foothills.

As mentioned above in the Project Description, the site is located east of Leonard Avenue, and just south of Barstow Avenue and the Enterprise Canal. In general, the Project site is within an urbanized area of the City, surrounded by existing rural residential, and newly constructed homes, as well as homes under construction. The site is within the Loma Vista Specific Plan at its easternmost of boundary of the Specific Plan area.

DISCUSSION

a) *Would the project have a substantial effect on a scenic vista?*

Less-Than-Significant Impact. As mentioned above, there are no officially designated scenic vistas or focal points in the City of Clovis. While the Sierra Nevada Mountains can be viewed on clear days, the Project would allow structures to be constructed at a maximum height of 35 feet. This would be consistent with the height limits of the immediately surrounding area and with the Zone District of the Project site. Further, General Plan Policy 2.3 requires that public views of open spaces, parks, and natural features be maintained. The site itself would be directly adjacent to approximately 18 acres of park space planned for the future. Therefore, because the Project would be constructed at a maximum height consistent with the area, and because there are no officially designated scenic vistas or focal points in Clovis, a **less-than-significant impact** would occur and no mitigation measures are required.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?*

No Impact. As stated in the 2014 Clovis General Plan Environmental Impact Report (EIR), there are no Caltrans-designated scenic highways within the City of Clovis.² Further, there are no existing historical structures or rock outcroppings located on or within the immediate vicinity of the site. Therefore, the Project would result in **no impact** with regards to substantially damaging scenic resources within a State scenic highway, and no mitigation measures are required.

c) *Would the project 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Less-Than-Significant Impact. As mentioned previously, the existing site is within an urbanized area surrounded by a mix of rural residential and low and medium-density residential. Immediately west of the Project site is a medium-density residential project under construction, as well as to the north. Further, there is an approved tract map south of the site. Thus, the area is characterized by a mix of residential uses at varying densities which contributes to different heights, design, and character. Further, the Project would be subject to the City's RSPR process to ensure cohesive design and character with the surrounding area. Therefore, the Project would complement and enhance the visual character of the area by resulting in a new and diverse housing type that would be of a similar scale and character of the surrounding area.

² 2014 Clovis General Plan EIR, June 2014, Page 5.1-1.

In addition, Policy 3.6 of the Land Use Element of the Clovis General Plan encourages a mix of housing types, unit sizes, and densities. The Project, as a medium-density single-family neighborhood, would contribute to the compliance of Policy 3.6 by resulting in a housing product that adds to the variety of housing stock within the City. Further, the Project would undergo Residential Site Plan Review (RSPR) which would ensure that the overall design and character is consistent and/or complements the surrounding areas. The RSPR process will ensure the Project complies with relevant design policies, such as in the Loma Vista Specific Plan, Clovis Development Code, and the General Plan. During the review, the height, color and materials are reviewed for consistency with these plans and guidelines. Consequently, a **less-than-significant** impact would occur with regards to substantially degrading the existing visual character of the site and its surroundings, and no mitigation measures are required.

- d) *Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?*

Less-Than-Significant Impact. The Project consists of an approximately 217 single-family home neighborhood. As a result of the existing site being vacant and undeveloped, the Project would result in new sources of light and glare. Light and glare from the Project would be typical of residential development, including but not limited to, sources such as exterior lighting for safety, light and glare from vehicles or from light reflecting off of surfaces such as windshields. Other sources of light would be the interior lighting of the units at night. These sources of light and glare are not typically associated with causing significant effects on the environment. Further, the site is already surrounded by existing residential uses. This existing development has contributed to the urbanization of the area, therefore, lighting and glare are already being emitted in the vicinity. Sources of existing light and glare are comprised of streetlights, exterior shopping center lighting, parking lot lighting, light and glare from vehicles going to and from the shopping center and adjacent residential development.

Although the Project would introduce new sources of light and glare, the RSPR process would ensure that the design and placement of lighting is appropriate to minimize potential light and glare impacts to surrounding properties. Further, the Project would be required to comply with Section 9.22.050, Exterior Light and Glare, of the Clovis Municipal Code (CMC or Development Code), which requires light sources to be shielded and that lighting does not spillover to adjacent properties.

Overall, through the City’s design review process and compliance with Section 9.22.050 of the Development Code, the Project would result in a **less-than-significant impact** with regard to lighting adversely affecting day or nighttime views in the area. No mitigation measures are required.

2. AGRICULTURE AND FORESTRY RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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 non-agricultural use.			X	

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220 (g)) or timberland (as defined in Public Resources Code section 4526)?				X
d. Result in the loss of forest land or conversion of forest land to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?			X	

ENVIRONMENTAL SETTING

The Project site is located on a vacant parcel south of the Enterprise Canal, east of Leonard Avenue. The site is within an urbanized area of the City and within an area previously planned for development through the Loma Vista Specific Plan and 2014 Clovis General Plan. Although the site was previously farmed, it has not been actively farmed in recent years. Currently, the site consists mostly of low-lying vegetation, shrubs, and grasses.

DISCUSSION

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*

Less-Than-Significant Impact. According to the 2016 Farmland Monitoring and Mapping Program (FMMP) maps from the California Department of Conservation,³ the Project site is considered Farmland of Local Importance, which is defined by the Department of Conservation as farmable lands within Fresno County that do meet the definitions of Prime, Statewide, or Unique farmlands. Generally, Farmland of Local Importance is or has been used for irrigated pasture, dryland farming, livestock, dairy, and grazing land.

The Project site is planned for residential use in the Loma Vista Specific Plan and the 2014 Clovis General Plan, and is not designated for farming activities. Consequently, because the site is not considered Prime, Unique, or Farmland of Statewide Importance, a **less-than-significant** impact would occur, and no mitigation measures are required.

³ Farmland Mapping and Monitoring Program, California Department of Conservation, 2016 Fresno County Map.

b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?*

No Impact. As shown on Figure 5.2-2 of the Agricultural Resources Chapter of the 2014 Clovis General Plan EIR, the Project site is not under a Williamson Act Contract. However, the Project is currently within the County of Fresno AE-20 zone district which does permit agricultural uses. The Project includes a request for annexation into the City of Clovis limit and a pre-zone request to the R-1-PRD Clovis zone district. However, the site is within the City of Clovis Sphere of Influence and was previously planned for future residential use, as well as analyzed in the Loma Vista Specific Plan EIR. If the annexation is approved and the site does become part of the City limit, then the residential use would be consistent with residential uses and not conflict with agricultural zoning. As a result, the Project would have a **less-than-significant** with regards to conflicting with existing zoning for agricultural use or a Williamson Act Contract. No mitigation measures are required.

c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220 (g)) or timberland (as defined in Public Resources Code section 4526)?*

No Impact. The Project site is mostly vacant and undeveloped, thus, does not contain forest land. Further, the site is not designated for forestry or other forestry related uses. As a result, **no impact** would occur with regards to conflicts with existing zoning for, or cause rezoning of, forest land. No mitigation measures are required.

d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

No Impact. See discussion under Section 2c.

e) *Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?*

Less-Than-Significant Impact. Although the Project site is considered Farmland of Local Importance according to the Department of Conservation, the site is not designated for agricultural uses. Further, the existing site hasn't been used for agricultural related uses in recent years. Under the Loma Vista Specific Plan and 2014 Clovis General Plan, the site is designated and planned for residential use. Additionally, see discussion under Section 2.C related to forest land. Overall, the project would have a **less-than-significant** impact with regards to this topic and no mitigation measure are required.

3. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?			X	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment			X	

under an applicable federal or state ambient air quality standard?				
c. Expose sensitive receptors to substantial pollutant concentrations?			X	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

ENVIRONMENTAL SETTING

An Air Quality and Greenhouse Gas Analysis Report (AQ/GHG Report) was prepared by Mitchell Air Quality Consulting on March 5, 2020 (see Appendix A). Information in this AQ/GHG Report is used for the analysis included in both the Air Quality and Greenhouse Gas Emissions section of this Initial Study.

San Joaquin Valley Air Basin

The City of Clovis (City) is in the central portion of the San Joaquin Valley Air Basin (SJVAB). SJVAB consists of eight counties: Fresno, Kern (western and central), Kings, Tulare, Madera, Merced, San Joaquin, and Stanislaus. Air pollution from significant activities in the SJVAB includes a variety of industrial-based sources as well as on- and off-road mobile sources. These sources, coupled with geographical and meteorological conditions unique to the area, stimulate the formation of unhealthy air.

The SJVAB is approximately 250 miles long and an average of 35 miles wide. It is bordered by the Sierra Nevada in the east, the Coast Ranges in the west, and the Tehachapi mountains in the south. There is a slight downward elevation gradient from Bakersfield in the southeast end (elevation 408 feet) to sea level at the northwest end where the valley opens to the San Francisco Bay at the Carquinez Straits. At its northern end is the Sacramento Valley, which comprises the northern half of California’s Central Valley. The bowl-shaped topography inhibits movement of pollutants out of the valley (SJVAPCD 2012a).

Topography⁴

The topography of a region is important for air quality because mountains can block airflow that would help disperse pollutants, and can channel air from upwind areas that transports pollutants to downwind areas. The San Joaquin Valley Air Pollution Control District (SJVAPCD) covers the entirety of the SJVAB. The SJVAB is generally shaped like a bowl. It is open in the north and is surrounded by mountain ranges on all other sides. The Sierra Nevada mountains are along the eastern boundary (8,000 to 14,000 feet in elevation), the Coast Ranges are along the western boundary (3,000 feet in elevation), and the Tehachapi Mountains are along the southern boundary (6,000 to 8,000 feet in elevation).

Climate

The SJVAB is in a Mediterranean climate zone and is influenced by a subtropical high-pressure cell most of the year. Mediterranean climates are characterized by sparse rainfall, which occurs mainly in winter. Summers are hot and dry. Summertime maximum temperatures often exceed 100°F in the valley.

⁴ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, page 9, April 16, 2019.

The subtropical high-pressure cell is strongest during spring, summer, and fall and produces subsiding air, which can result in temperature inversions in the valley. A temperature inversion can act like a lid, inhibiting vertical mixing of the air mass at the surface.

Any emissions of pollutants can be trapped below the inversion. Most of the surrounding mountains are above the normal height of summer inversions (1,500–3,000 feet).

Winter-time high pressure events can often last many weeks, with surface temperatures often lowering into the 30°F. During these events, fog can be present and inversions are extremely strong. These wintertime inversions can inhibit vertical mixing of pollutants to a few hundred feet (SJVAPCD 2012a).

Ambient Air Quality Standards

The Clean Air Act (CAA) was passed in 1963 by the US Congress and has been amended several times. The 1970 Clean Air Act amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for areas not meeting National AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tend to be more restrictive than the National AAQS, based on even greater health and welfare concerns.

These National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect “sensitive receptors,” those most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Both California and the federal government have established health-based AAQS for seven air pollutants. As shown in Table 4, Ambient Air Quality Standards for Criteria Pollutants, these pollutants are ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), and lead (Pb). In addition, the state has set standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

In addition to the criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are injurious in small quantities and are regulated despite the absence of criteria documents. The identification, regulation and monitoring of TACs is relatively recent compared to that for criteria pollutants. Unlike criteria pollutants, TACs are regulated on the basis of risk rather than specification of safe levels of contamination.

Table 3: Ambient Air Quality Standards

Pollutant	Averaging Time	Federal Primary Standard	State Standard
Ozone	1-Hour	--	0.09 ppm
	8-Hour	0.07 ppm	0.07 ppm
Carbon Monoxide	8-Hour	9.0 ppm	9.0 ppm
	1-Hour	35.0 ppm	20.0 ppm
Nitrogen Dioxide	Annual	0.053 ppm	0.03 ppm
	1-Hour	0.100 ppm	0.18 ppm
Sulfur Dioxide	Annual	0.03 ppm	--
	24-Hour	0.14 ppm	0.04 ppm
	3-Hour	0.5 ppm	
	1-Hour	0.075 ppm	0.25 ppm
PM ₁₀	Annual	--	20 ug/m ³
	24-Hour	150 ug/m ³	50 ug/m ³
PM _{2.5}	Annual	12 ug/m ³	12 ug/m ³
	24-Hour	35 ug/m ³	--
Lead	30-Day Avg.	--	1.5 ug/m ³
	3-Month Avg.	1.5 ug/m ³	--

Notes: ppm = parts per million; ug/m³ = micrograms per cubic meter.
 Source: California Air Resources Board, 2008. Ambient Air Quality Standards (4/01/08), <http://www.arb.ca.gov/aqs/aaqs2.pdf>.

Attainment Status

The air quality management plans prepared by SJVAPCD provide the framework for SJVAB to achieve attainment of the state and federal AAQS through the SIP. Areas are classified as attainment or nonattainment areas for particular pollutants, depending on whether they meet the ambient air quality standards. Severity classifications for ozone nonattainment range in magnitude from marginal, moderate, and serious to severe and extreme.

At the federal level, the SJVAPCD is designated as extreme nonattainment for the 8-hour ozone standard, attainment for PM₁₀ and CO, and nonattainment for PM_{2.5}. At the state level, the SJVAB is designated nonattainment for the 8-hour ozone, PM₁₀, and PM_{2.5} standards. The SJVAB has not attained the federal 1-hour ozone, although this standard was revoked in 2005.

DISCUSSION

- a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

Less-Than-Significant Impact. Although the CEQA Guidelines indicate that a significant impact would occur if the Project were to conflict with or obstruct implementation of the applicable air quality plan, the SJVAPCDs 2015 Guide for Assessing and Mitigating Air Quality Impacts (GAMAQI) does not provide specific guidance on analyzing conformity with the plan. Thus, for purposes of analyzing this potential impact, the AQ/GHG Report considered impacts based on: (1) whether the Project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards; and (2) whether the Project will comply with applicable control measures in the air quality plan, primarily compliance with Regulation VIII – Fugitive PM₁₀ Prohibitions and Rule 9510 – Indirect Source Review.

In general, regional air quality impacts and attainment of standards are the result of the cumulative impacts of all emission sources within the air basin. Thus, individual projects are generally not large enough to contribute measurably to an existing violation or air quality standards alone. Therefore, in order to analyze this threshold, and because the of the region's existing nonattainment status for several pollutants, the Project would be considered to cause significant impacts if it were to generate emissions that would exceed the SJVAPCDs significance thresholds. Based on the AQ/GHG Report, the Project would not exceed these thresholds from construction and operation of the Project.⁵

- b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Less-Than-Significant Impact. See discussion under Section 3a above.

- c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less-Than-Significant Impact. Sensitive receptors are generally considered to include children, the elderly, and persons with pre-existing respiratory and cardiovascular illness. The SJVAPCD considers a sensitive receptor a location that houses or attracts children, the elderly, or people with illnesses. Examples of these receptors are considered to be hospitals, residences, schools and school facilities, and convalescent facilities. The nearest sensitive receptors to the Project site would be the existing residences adjacent to the site to the north, west, and east. Based the AQ/GHG Report, the Project would not exceed emission thresholds that would result in a significant impact⁶ based on compliance with SJVAPCD regulations and standards for construction and operation of this type of development. Therefore, a **less-than-significant** impact would occur.

- d) *Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less-Than-Significant Impact. Generally, sources considered to emit odors are associated with wastewater treatment facilities, sanitary landfills, petroleum refineries, chemical manufacturing, and other industrial/manufacturing related uses. The Project is a residential use, thus, the odors associated with such use would be similar to that of the surrounding area which includes other residential uses. Overall, because the Project is a residential use, similar to existing residential uses, the types of odor that could result from the Project would not be considered an objectionable odor source. Thus, a **less-than-significant** impact would occur.

⁵ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, starting on page 76, March 5, 2020.

⁶ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, starting on page 89, March 5, 2020.

4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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 or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	
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, filling, hydrological interruption, or other means?			X	
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		X		

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

ENVIRONMENTAL SETTING

A biological resources report (Biological Report) was prepared by Argonaut Ecological Consulting, Inc., dated in February 20, 2020 (see Appendix B). This Biological Report included an evaluation for the presence and potential for special-status biological resources of the site.

The existing Project site is mostly vacant and undeveloped consisting of pastureland, and non-native grassland. According to the Biological Report, there are no seasonal wetlands or any other wetlands at the Project site, nor is there critical habitat. The following analysis is based in part on information provided by the Biological Report prepared by Argonaut Ecological Consulting, Inc.

DISCUSSION

- a) *Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

Less-Than-Significant Impact With Mitigation. As described in the Biological Report, several habitat types were observed at the site, including pasture, ruderal/disturbed, and non-native grassland.⁷ Further, the report concluded that there is no critical habitat for any listed species within or near the study area.⁸

During field observations, wildlife activity was determined to be low, which is consistent with urbanized areas. Animal species detected included squirrels, song birds. While the report identified species that would have the highest likelihood of occurring the area, none were observed during the field visit and a search of the California Natural Diversity Database (CNDDB) did not identify the recent presence of special-status species at the site or in the immediate area. Further, the area was concluded not be within the vicinity of any known California tiger salamander breeding ponds. However, portions of the area near and at the Dog Creek may provide suitable habitat for burrowing owls and nesting birds. Although a vehicular bridge would be constructed, the appropriate permitting and protections in accordance with all applicable agencies and departments would occur to ensure the bridge is constructed adhering to the proper regulations.

⁷ Biological Analysis Report for Tract 6304 prepared by Argonaut Ecological Consultants, Inc., page 12, February 20, 2020.

⁸ Biological Analysis Report for Tract 6304 prepared by Argonaut Ecological Consultants, Inc., page 17, February 20, 2020.

With regards to special-status plants, the Biological Report concluded that while there are special-status plant species within this region of the County, the site's conditions and previous use as pastureland and grazing activities result in a very low likelihood that special-status plant species would be present.

Overall, due to the lack of presence of special-status plant and animal species, as well as the site being surrounded by existing urban development and has been previously disturbed from farming-related activities, it is not likely that the Project would have a substantial adverse effect to habitat supporting these special status species. Nevertheless, implementation of mitigation measures BIO-1 and BIO-2 would ensure that a **less-than-significant impact with mitigation** occurs.

Mitigation Measure BIO-1: Pre-Activity Surveys for Birds (raptors, migratory birds, and other protected bird species). Site disturbance shall be initiated outside of the nesting period of migratory birds and nesting raptors (generally between February 1 and August 31). If avoidance is not possible, a pre-construction survey shall be prepared by a qualified biologist to determine the presence of birds such as the burrowing owl and other protected bird species. If the biologist determines the presence of such birds, the developer shall establish a buffer zone(s) of adequate size, as determined by the biologist, to prevent disturbance of the nest until the young have fledged.

Mitigation Measure BIO-2: Avoidance and Minimization Measures for Construction Near the Dog Creek. Site development shall be designed to minimize impacts and disturbance to Dog Creek whenever possible. This shall include worker training, covering excavations near the Dog Creek to prevent the trapping of wildlife, and/or the establishment of exclusion fencing to prevent equipment from being used outside of the designated work zone.

- b) *Would the project 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 Game or US Fish and Wildlife Service?*

Less-Than-Significant Impact. As mentioned previously, the Project site is characterized primarily by pastureland and non-native grassland. Although the site is adjacent to the Dog Creek, with the exception of construction of the vehicular bridge for access, there would be minimal disturbance to the Dog Creek. Further, the bridge would be permitted accordingly with the appropriate agencies prior to construction. Therefore, the Project would not result in a substantial adverse effect with respect to this threshold, and a **less-than-significant** impact would occur. No mitigation measures are required.

- c) *Would the project have a substantial adverse effect on state or federally protected wetlands as (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Less-Than-Significant Impact. Other than the Dog Creek, which would require a Section 404 permit and other entitlements from other agencies for the construction of the bridge, there were no wetlands identified at the site. Therefore, **less-than-significant** impact would occur.

- d) *Would the project 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?*

Less-Than-Significant Impact With Mitigation. According to the Biological Report, the Dog Creek could serve as a wildlife corridor.⁹ While the Project does include construction of a bridge, there would be no other areas disturbed as part of the Project. Further, compliance with Mitigation Measure BIO-2, above, would ensure that disturbance to the Dog Creek is minimized during construction. Consequently, a **less-than-significant impact with mitigation** would occur.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Less-Than-Significant Impact. Although the Project would include development of an existing undeveloped and vacant site, the site does not indicate the presence of any sensitive habitat or wildlife features that would be significantly impacted. Although Policy 2.6 of the Open Space and Conservation Element of the General Plan calls for the protection of biological resources, the Biological Report did not identify any such resources at the site due to its location and being surrounded by urban development.

Further, the Clovis Development Code does include tree protection standards for if there are some trees that need removal during construction. Under the tree protection regulations, the applicant may be required to replace removed trees and/or pay in-lieu fees for the planting of new trees. Consequently, due to the lack of any identified sensitive species, and because the Project does not propose the immediate removal of any existing trees, the impact would be **less-than-significant** as the Project would not conflict with local policies or ordinances for protection biological resources.

- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

No Impact. The Project site is not located within an adopted or approved Habitat Conservation Plan (HCP) or other conservation plan. However, the site is within the PG&E San Joaquin Valley Operation and Maintenance HCP, although the PG&E HCP applies only to PG&E construction and maintenance activities and does not apply to the site. Overall, **no impact** would occur and no mitigation measures are required.

⁹ Biological Analysis Report for Tract 6304 prepared by Argonaut Ecological Consultants, Inc., page 20, February 20, 2020.

5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				X
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c. Disturb any human remains, including those interred outside of formal cemeteries?		X		

ENVIRONMENTAL SETTING

The Project site is located on an undeveloped and vacant site previously used for farming and as pastureland. The site does not contain any structures where the Project would occur; however, there are structures west of the Dog Creek, which would not be affected by buildout of the Project.

A cultural resources assessment was prepared by Peak & Associates, Inc., on February 14, 2020 (see Appendix C). This assessment was based on information obtained at the Southern San Joaquin Valley Information Center, CSU Bakersfield, as well as a field assessment for observations.

DISCUSSION

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

No Impact. According to the cultural resources assessment, the site is not within immediate proximity to any known historical resource, nor are resources that are present eligible for the California Register of Historical Resources.¹⁰ Further, the assessment concluded that while there are structures adjacent to the site, west of Dog Creek, these structures do not appear to include features that would qualify for historical preservation. Further, compliance with Policy 2.9 of the General Plan, which calls for the preservation of historical sites and buildings of state or national significance, would ensure that if there were historical resources present, they would be protected. Therefore, **no impact** would occur with regard to the Project causing a substantial adverse change in the significance of a historical resource and no mitigation measures are required.

¹⁰ Cultural Resources Assessment for TM6304, Peak & Associates, Inc., February 14, 2020, page 14.

- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less-Than-Significant Impact With Mitigation. The site is currently vacant and undeveloped, although is surrounded by existing urban and rural residential development. However, the site's ground has been previously disturbed as a result of mowing of weeds and shrubs, farming, and grazing related to agricultural uses. The cultural resources memorandum prepared for the Project concluded that the lack of historical or archaeological resources within a 0.5-mile radius, as a result of studies from other projects, would make it unlikely that the Project would encounter such resources during construction. Nevertheless, the potential remains that archeological resources could be inadvertently or accidentally uncovered during ground-disturbing activities such as trenching, digging, and the installation of utilities and other infrastructure.

Because there is the slight possibility for the accidental or inadvertent uncovering of archaeological resources during construction, Mitigation Measure CULT-1 would serve to reduce those potential impacts by requiring the stopping of any work until any found artifacts can be properly removed and inventoried by a qualified archaeologist. Therefore, the Project would result in a **less-than-significant impact with mitigation**.

Mitigation Measure CULT-1: If prehistoric or historic-era cultural or archaeological materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, can evaluate the significance of the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historic resources such as glass, metal, wood, brick, or structural remnants.

If the qualified professional archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation.

If a potentially-eligible resource is encountered, then the qualified professional archaeologist, the Lead Agency, and the project proponent shall arrange for either 1) total avoidance of the resource or 2) test excavations to evaluate eligibility and, if eligible, total data recovery. The determination shall be formally documented in writing and submitted to the Lead Agency as verification that the provisions for managing unanticipated discoveries have been met.

- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Less-Than-Significant Impact With Mitigation. The site is currently vacant and undeveloped, although is surrounded by existing urban and rural residential development. However, the site's ground has been previously disturbed as a result of mowing of weeds and shrubs, farming, and grazing related to agricultural uses. The cultural resources memorandum prepared for the Project concluded that the lack of historical or archaeological resources within a 0.5-mile radius, as a result of studies from other projects, would make it unlikely that the Project would encounter such resources during construction. Nevertheless, the potential remains that human remains could be inadvertently or accidentally uncovered during ground-disturbing activities such as trenching, digging, and the installation of utilities and other infrastructure.

Because there is the slight possibility for the accidental or inadvertent uncovering of human remains during construction, Mitigation Measure CULT-2 would serve to reduce those potential impacts by requiring the stopping of any work until any found human remains can be properly removed by the County coroner and/or tribes. Therefore, the Project would result in a **less-than-significant impact with mitigation**.

Mitigation Measure CULT-2: If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of discovery of human remains, at the direction of the County coroner. All reports, correspondence, and determinations regarding the discovery of human remains on the project site shall be submitted to the Lead Agency.

6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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?			X	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

ENVIRONMENTAL SETTING

The Project site is located on an infill site surrounded by existing urban and rural residential uses and is within the Loma Vista Specific Plan.

DISCUSSION

- a) *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less-Than-Significant Impact. The Project proposes the construction of approximately 217 single-family homes, along with associated landscape, hardscape, and infrastructure (i.e. drive aisles, utilities, etc.). The Project would include construction activities typical of residential development, thus, is not

generally considered the type of use or intensity that would result in the unnecessary consumption of energy. The homes themselves would comply with the most recent Title 24 Green Building Standards for energy efficiency, as well as be required to comply with the latest water efficient landscape policy regulations. Further, Clovis General Plan Policy 3.4, and 3.7 of the Open Space and Conservation, calls for the use of water conserving and drought tolerant landscape, as well as energy efficient buildings. Consequently, compliance with these measures would ensure that the Project does not result in a significant impact due to the unnecessary consumption of energy and **less-than-significant** impact would occur.

- b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less-Than-Significant Impact. See discussion under Section 6a above.

7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b. Result in substantial soil erosion or the loss of topsoil?			X	
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,			X	

subsidence, liquefaction or collapse?				
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or unique geologic feature?		X		

ENVIRONMENTAL SETTING

The 2014 Clovis General Plan EIR identified no geologic hazards or unstable soil conditions known to exist on the Project site. Although Figure 5.6-2 of the Geology and Soils Chapter of the General Plan EIR does show a fault, the fault is located several miles east of the Project site.

DISCUSSION

- a) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?; ii) Strong seismic ground shaking?; iii) Seismic-related ground failure, including liquefaction?; iv) Landslides?*

Less-Than-Significant Impact. Although the Project site does not have any known faults on the site, the potential remains that seismic ground-shaking could occur from the fault located east of the Project. However, adherence to the most current California Building Codes would ensure that the structures are constructed safely and in compliance with the appropriate Building Codes. With regards to liquefaction, the 2014 General Plan EIR states that the soil types in the area are not considered conducive to liquefaction due to their high clay content or from being too coarse.¹¹ Further, the site is generally flat and therefore landslides would not occur at the Project site. Overall, due to the location away from a known fault, adherence to the most recent California Building Codes, and the flat topography, a **less-than-significant impact** would occur with regards to potential impacts from seismic activity.

- b) *Would the project result in substantial soil erosion or the loss of topsoil?*

¹¹ 2014 Clovis General Plan EIR, Chapter 5: Geology and Soils, page 5.6-3.

Less-Than-Significant Impact. Although the site is relatively flat, grading activities would be required to ensure a flat and graded surface prior to construction, which may result in the soil erosion and loss of topsoil. However, as part of the Project, grading plans are required to be submitted and approved by the City Engineer Division to ensure appropriate grading of the site. Thus, this review and approval process would ensure that a **less-than-significant** impact occur and no mitigation measures are required.

- c) *Would the project 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?*

Less-Than-Significant Impact. See discussion under Section 7a.

- d) *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?*

No Impact. According to the 2014 Clovis General Plan EIR, expansive soils are mostly present in areas along the northern edge of the non-Sphere of Influence (SOI) and the easternmost part of the Clovis non-SOI plan area. Because the Project is not within the vicinity of these areas, there would be no potential for creating direct or indirect substantial risks to life or property with regards to expansive soils. As a result, **no impact** would occur and no mitigation measures are required.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems where sewers are not available for the disposal of wastewater?*

No Impact. The Project does not propose the use of septic tanks, therefore, **no impact** would occur.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or unique geologic feature?*

Less-Than-Significant Impact With Mitigation. The Project site has been previously disturbed, as well as the immediately surrounding areas with no known occurrences of the discovery of paleontological resources. In addition, the cultural resources memorandum concluded that the potential for uncovering of archaeological or subsurface historical deposits (i.e. paleontological resources) is unlikely. Nevertheless, the possibility remains that the inadvertent or accidental discovery could occur during ground disturbing construction activities. However, Mitigation Measure GEO-1, below, would serve to protect the accidental discovery of paleontological resources. As such, a **less-than-significant with mitigation** impact would occur.

Mitigation Measure GEO-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified professional archaeologist and/or paleontologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, can evaluate the significance of the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historic resources such as glass, metal, wood, brick, or structural remnants.

If the qualified professional determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation.

If a potentially-eligible resource is encountered, then the qualified professional archaeologist and/or paleontologist, the Lead Agency, and the project proponent shall arrange for either 1) total avoidance of the resource or 2) test excavations to evaluate eligibility and, if eligible, total data recovery. The determination shall be formally documented in writing and submitted to the Lead Agency as verification that the provisions for managing unanticipated discoveries have been met.

8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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?			X	
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	

ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG's has been implicated as a driving force for global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community, but in general can be described as the changing of the earth's climate caused by natural fluctuations and anthropogenic activities which alter the composition of the global atmosphere.

Individual Projects contribute to the cumulative effects of climate change by emitting GHGs during construction and operational phases. The principal GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide-equivalent" measures. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs, with much greater heat-absorption potential than carbon dioxide, include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming, although there is uncertainty concerning the magnitude and rate of the warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires,

and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emission of greenhouse gases (GHG) would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32), which requires the California Air Resources Board (CARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

In April 2009, the California Office of Planning and Research published proposed revisions to the California Environmental Quality Act to address GHG emissions. The amendments to CEQA indicate the following:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that "to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation."
- OPR's emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

On December 30, 2009, the Natural Resources Agency adopted the proposed amendments to the CEQA Guidelines in the California Code of Regulations.

In December 2009, the San Joaquin Valley Air Pollution Control District (SJVAPCD) adopted guidance for addressing GHG impacts in its *Guidance for Valley Land Use Agencies in Addressing GHG Impacts for New Projects Under CEQA*. The guidance relies on performance-based standards, otherwise known as Best Performance Standards (BPS), to assess significance of project-specific GHG emissions on global climate change during the environmental review process.

Projects can reduce their GHG emission impacts to a less than significant level by implementing BPS. Projects can also demonstrate compliance with the requirements of AB 32 by demonstrating that their emissions achieve a 29% reduction below “business as usual” (BAU) levels. BAU is a projected GHG emissions inventory assuming no change in existing business practices and without considering implementation of any GHG emission reduction measures.

Significance Criteria

The SJVAPCDs *Guidance for Valley Land Use Agencies in Addressing GHG Impacts for New Projects Under CEQA* provides initial screening criteria for climate change analyses, as well as draft guidance for the determination of significance.

The effects of project-specific GHG emissions are cumulative, and therefore climate change impacts are addressed as a cumulative, rather than a direct, impact. The guidance for determining significance of impacts has been developed from the requirements of AB 32. The guideline addresses the potential cumulative impacts that a project’s GHG emissions could have on climate change. Since climate change is a global phenomenon, no direct impact would be identified for an individual land development project. The following criteria are used to evaluate whether a project would result in a significant impact for climate change impacts:

- Does the project comply with an adopted statewide, regional, or local plan for reduction or mitigation of GHG emissions? If no, then
- Does the project achieve 29% GHG reductions by using approved Best Performance Standards? If no, then
- Does the project achieve AB 32 targeted 29% GHG emission reductions compared with BAU?

Projects that meet one of these guidelines would have less than significant impact on the global climate.

Because BPS have not yet been adopted and identified for specific development projects, and because neither the ARB nor the City of Clovis has not yet adopted a plan for reduction of GHG with which the Project can demonstrate compliance, the goal of 29% below BAU for emissions of GHG has been used as a threshold of significance for this analysis.

An Air Quality and Greenhouse Gas Analysis Report (AQ/GHG Report) was prepared by Mitchell Air Quality Consulting on March 5, 2020 (see Appendix A). The following analysis is based in part on the findings of that report.

DISCUSSION

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Less-Than-Significant Impact. The Project would include the construction and operation of approximately 217 single-family residential units. As such, GHG emissions would be produced through the construction and operational phases of the Project. However, the SJVAPCD includes regulations to reduce GHG emissions such as standards for medium and heavy duty engines and vehicles (i.e. tractors and construction equipment) that would apply to buildout of the Project. Further, compliance with Title 24 energy efficient building codes would apply, which also help to reduce GHG emissions during operation of the Project, by requiring minimum standards for insulation, energy efficiency, and window glazing, etc., which serve to maximize efficiency of new construction. Further, the Project would comply with the latest water efficient landscape standards which help to reduce energy usage. Overall, the AQ/GHG Report concluded that the Project, with implementation of required energy efficient standards, would reduce emissions versus business as usual scenarios and would exceed the minimum percentage reduction of emissions required by the State, SJVAPCD, and the Clovis General Plan EIR.¹² Therefore, a **less-than-significant** impact would occur.

- b) *Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

Less-Than-Significant Impact. Based on the AQ/GHG Report,¹³ the Project would include several features that would minimize GHG emissions, which are consistent with project-level strategies identified by the Air Resources Board Scoping Plan and the Clovis General Plan. As indicated in the discussion above under Section 8a, the Project would result in GHG reductions that meet or exceed minimum targets by complying with the latest energy efficient standards, and water conservation. Consequently, the AQ/GHG Report found this potential impact to be **less than significant**.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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?			X	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	

¹² Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, page 111, March 5, 2020.

¹³ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, starting on page 125, March 5, 2020.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	

ENVIRONMENTAL SETTING

For purposes of this chapter, the term “hazardous materials” refers to both hazardous substances and hazardous wastes. A “hazardous material” is defined in the Code of Federal Regulations (CFR) as “substance or material that is capable of posing an unreasonable risk to health, safety, and property when transported in commerce” (49 CFR 171.8). California Health and Safety Code Section 25501 defines a hazardous material as follows:

“Hazardous material” means any material that, because of its quantity, concentration, or physical, or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

“Hazardous materials” include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment. “Hazardous wastes” are defined in California Health and Safety Code Section 25141(b) as wastes that:

...because of their quantity, concentration, or physical, chemical, or infectious characteristics, [may either] cause or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

The nearest school(s) to the Project site is the Reagan Educational Center, located approximately one (1.25) miles southwest of the site. The Reagan Educational Center includes Reagan Elementary School, Reyburn Intermediate School, and Clovis East High School.

DISCUSSION

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less-Than-Significant Impact. The Project consists of the construction of 217 single-family homes on an existing vacant and undeveloped site. The type of hazardous materials that would be associated with the Project are those typical of residential uses, such as the use of household cleaners, landscape maintenance products, soaps, and potential pesticides (for pest control). Overall, the Project would not routinely transport, use, or dispose of hazardous materials other than those typical of residential development, which are not generally considered of the type or quantity that would pose a significant hazard to the public when used as directed. During construction, typical equipment and materials would be used that are associated with residential construction; however, any chemicals or materials would be handled, stored, disposed of, and/or transported according to applicable laws. Consequently, because the Project is not of the type of use that would routinely transport, use, or dispose of hazardous materials a **less-than-significant** impact would occur.

- b) *Would the project 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?*

Less-Than-Significant Impact. See discussion above under Section 9a.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less-Than-Significant Impact. As mentioned above, the Project site is located approximately one (1.25) miles from the nearest school, which is the Reagan Educational Center. Further, the Project is not of the type of use typically associated with emitting hazardous emissions or handling the type or quantity of hazardous materials such that it would pose a risk or threat to the school, or surrounding area. Therefore, a **less-than-significant** impact would occur.

d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. According the California Department of Toxic Substance Control EnviroStor Database, the Project site is not located on or within the immediate vicinity of a hazardous materials site.¹⁴ Therefore, **no impact** would occur.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

No Impact. The Project is not within an airport land use plan nor is the site within two miles of a public airport. Therefore, **no impact** would occur.

f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less-Than-Significant Impact. The Project is located at a site that is surrounded by existing development. Further, the proposed road network serving the site would undergo review and approval by City staff to ensure adequate access to the site for responding to emergencies. Although the Project could result in temporary traffic detouring or closures during buildout, these delays would be temporary and would be coordinated with the City engineering department and other departments to ensure safe access to and from the area is maintained. Further, the site itself would reviewed by City departments to ensure adequate site access and circulation is provided in the event of an emergency. Overall, a **less-than-significant** impact would occur.

g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

Less-Than-Significant Impact. The site is an infill site surrounded by urban and rural residential uses. Therefore, it is not in a location typically associated with wildfires. Although urban fires could occur, the Project would be constructed to the latest fire code standards, which would include fire sprinklers in each unit, as well as the installation of several fire hydrants throughout the site as required by the Clovis Fire Department. Further, other life safety features would be required such as smoke detectors, which would be reviewed and checked by the Fire Department to ensure proper operation prior to occupancy. Ultimately, a **less-than-significant** impact would occur.

10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements			X	

¹⁴ California Department of Toxic Substance Control, EnviroStor Database, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=71003467, accessed on May 18, 2020.

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?			X	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?			X	
i) Result in substantial erosion or siltation on- or off-site?			X	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			X	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
iv) Impede or redirect flood flows?			X	
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
---	--	--	---	--

ENVIRONMENTAL SETTING

The Plan Area is within the drainages of three streams: Dry Creek, Dog Creek, and Redbank Slough. On the north, Dry Creek discharges into the Herndon Canal in the City of Fresno west of Clovis. South of Dry Creek, Dog Creek is a tributary of Redbank Slough, which discharges into Mill Ditch south of Clovis (USGS 2012). A network of storm drains in the City and the Plan Area discharges into 31 retention basins, most of which provide drainage for a one- to two-square-mile area. Most of the Plan Area east and northeast of the City is not in drainage areas served by retention basins. Those areas drain to streams that discharge into reservoirs, including Big Dry Creek Reservoir in the north-central part of the Plan Area and Redbank Creek Dam and Reservoir in the southeast part of the Plan Area. Fancher Creek Dam and Reservoir are near the east Plan Area boundary.

The Project is located within the Fresno Metropolitan Flood Control District (FMFCD) boundary, and subject to its standards and regulations. Detention and retention basins in the FMFCD’s flood control system are sized to accommodate stormwater from each basin’s drainage area in builtout condition. The current capacity standard for FMFCD basins is to contain runoff from six inches of rainfall during a ten-day period and to infiltrate about 75 to 80 percent of annual rainfall into the groundwater basin (Rourke 2014). Basins are highly effective at reducing average concentrations of a broad range of contaminants, including several polyaromatic hydrocarbons, total suspended solids, and most metals (FMFCD 2013). Pollutants are removed by filtration through soil, and thus don’t reach the groundwater aquifer (FMFCD 2014). Basins are built to design criteria exceeding statewide Standard Urban Stormwater Mitigation Plan (SUSMP) standards (FMFCD 2013). The urban flood control system provides treatment for all types of development—not just the specific categories of development defined in a SUSMP—thus providing greater water quality protection for surface water and groundwater than does a SUSMP.

In addition to their flood control and water quality functions, many FMFCD basins are used for groundwater recharge with imported surface water during the dry season through contracts with the Fresno Irrigation District (FID) and the cities of Fresno and Clovis; such recharge totaled 29,575 acre feet during calendar year 2012 (FMFCD 2013).

The pipeline collection system in the urban flood control system is designed to convey the peak flow rate from a two-year storm.

Most drainage areas in the urban flood control system do not discharge to other water bodies, and drain mostly through infiltration into groundwater. When necessary, FMFCD can move water from a basin in one such drainage area to a second such basin by pumping water into a street and letting water flow in curb and gutter to a storm drain inlet in an adjoining drainage area (Rourke 2014). Two FMFCD drainage areas discharge directly to the San Joaquin River, and three to an irrigation canal, without storage in a basin. Six drainage areas containing basins discharge to the San Joaquin River, and another 39 basins discharge to canals (FMFCD 2013).

A proposed development that would construct more impervious area on its project site than the affected detention/retention basin is sized to accommodate is required to infiltrate some stormwater onsite, such as through an onsite detention basin or drainage swales (Rourke 2014).

The Big Dry Creek Reservoir has a total storage capacity of about 30 thousand acre-feet (taf) and controls up to 230-year flood flows. Fancher Creek Dam and Reservoir hold up to 9.7 taf and controls up to 200-year flood flows. Redbank Creek Dam and Reservoir hold up to 1 taf and controls up to 200-year flood flows.

Groundwater

Clovis is underlain by the Kings Groundwater Basin that spans 1,530 square miles of central Fresno County and small areas of northern Kings and Tulare counties. Figure 5.9-4, Kings Groundwater Basin, shows that the basin is bounded on the north by the San Joaquin River, on the west by the Delta-Mendota and Westside Subbasins, the south by the Kings River South Fork and the Empire West Side Irrigation District, and on the east by the Sierra Nevada foothills. Depth to groundwater in 2016 ranged from 196.5 feet at the northwest City boundary to 69.5 feet at the southeast City boundary (Clovis 2016), 25 feet at the southeast SOI boundary, and about 20 feet at the eastern Plan Area boundary (FID 2013). The Kings Subbasin has been identified as critically overdrafted (Provost & Pritchard 2011).

In the Plan Area, groundwater levels are monitored by the City of Clovis and FID. The overall area has not experienced land subsidence due to groundwater pumping since the early 1900s (FID 2006). Subsidence occurs when underground water or natural resources (e.g., oil) are pumped to the extent that the ground elevation lowers. No significant land subsidence is known to have occurred in the last 50 years as a result of land development, water resources development, groundwater pumping, or oil drilling (FID 2006). The City has identified a localized area of subsidence of 0.6 feet in the vicinity of Minnewawa and Herndon Avenues within the last 14 years (Clovis 2016). Regional ground subsidence in the Plan Area was mapped as less than one foot by the US Geological Survey in 1999 (Galloway and Riley 1999). Groundwater levels in the San Joaquin Valley are forecast to hit an all-time low in 2014 (UCCHM 2014).

New development in accordance with the General Plan Update would increase the amount of impervious surface in the Plan Area, potentially affecting the amount of surface water that filters into the groundwater supply. Groundwater levels are monitored in the Plan Area by the FID and the City of Clovis. As described in the 2015 City of Clovis Urban Water Management Plan (UWMP), groundwater recharge occurs both naturally and artificially throughout the City. The Kings Groundwater Basin area is recharged through a joint effort between the Cities of Clovis and Fresno and the FID (CDWR 2006). Approximately 8,400 acre-feet per year (afy) of water are intentionally recharged into the Kings Groundwater Basin by the City of Clovis, and approximately 7,700 afy of water naturally flow into groundwater in the City's boundaries (Clovis 2011).

The FMFCD urban stormwater drainage system would provide groundwater infiltration for runoff from developed land uses in detention basins in the drainage system service area.

Projects pursuant to the proposed General Plan Update and developed outside of the FMFCD urban stormwater drainage system would be required to meet the requirements of NPDES regulations, including the implementation of BMPs to improve water retention and vegetation on project sites.

DISCUSSION

- a) *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Less-Than-Significant Impact. The Project is located on a site that was previously anticipated for the type and intensity of development that the Project proposes. Although the Project includes a request to increase density, a water and sewer study were prepared by the City and determined to have adequate capacity to serve the Project.

As with any development, existing policies and standards are required to be complied with, which are assessed during review of the entitlements. As such, the engineering department, as well as outside agencies such as the Fresno Metropolitan Flood Control District (FMFCD) review all plans to ensure that none of the water quality standards are violated and that waste discharge requirements are adhered to during construction and operation of the Project. Consequently, this process of Project review and approval would ensure that a **less-than-significant** impact occur.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less-Than-Significant Impact. The Project would not deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level due to the Project. The General Plan EIR identified a net decrease in ground water aquifer throughout the region, however, because the City's domestic water system is primarily served through surface water via existing water entitlements, the loss of aquifer is less than significant. The City has developed a surface water treatment plant (opened in June 2004) that reduces the need for pumped groundwater, and has also expanded the municipal groundwater recharge facility. The Project's impacts to groundwater are **less than significant**.

- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows?*

Less-Than-Significant Impact. The Project site is located on a site that is generally flat and surrounded by existing urban and rural residential uses. There is Dog Creek located at the western boundary of the site which would result in some disturbance related to the construction of the bridge, however, the applicant would be subject to State permitting for alteration and work within the streambed. Further, some of the infrastructure surrounding the site, such as stormdrains are already in place from existing development. The site is mostly pervious since it is currently undeveloped, and as a result, the Project would increase the amount of impervious surfaces by installing paving for roadways and sidewalks.

However, the drainage pattern would be constructed per existing policies and regulations through review of the plans by the City Engineering Department and the FMFCD to ensure the site is properly and adequately drained such that the stormdrain system is maintained and so that no flooding occurs. Consequently, this review and approval by City engineers and FMFCD would mean that the Project result in a **less-than-significant** impact.

- d) *Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less-Than-Significant Impact. The Project site is located on a site substantially surrounded by existing urban and rural residential uses. Due to the Central Valley's location away from the ocean, an impact from a tsunami is unlikely. However, the western half of the Project site is designated as a Federal Emergency Management Agency (FEMA) Flood Zone "AE" which is considered by FEMA as a special flood hazard area which could be subject to a 1-percent annual chance of flood. The FMFCD requires adherence to their Flood Plain Management Policy which would ensure that homes within the any flood zone are adequately protected from flood occurrence. Compliance with the FMFCD flood plain policy would ensure that result a **less-than-significant** impact would occur.

- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less-Than-Significant Impact. The City of Clovis is within the North Kings County Groundwater Sustainability Agency (GSA). Pursuant to the Sustainable Groundwater Management Act of 2014 (SGMA), certain regions in California are required to develop and implement a groundwater management plan that sustainably manages groundwater resources. As of the writing of this Initial Study, the North Kings County GSA has an adopted groundwater management plan, as of November 22, 2019, according to the North Kings GSA website.¹⁵ The Project would derive its water from surface water sources and does not propose or include plans for groundwater use. With regards to water quality control, the Project would be required to adhere to appropriate storm drain conveyance and the protection of water resources which would include the installation of backflow preventers. Consequently, the Project would result in a **less-than-significant** impact.

11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an existing community?			X	
b. Cause a 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?			X	

ENVIRONMENTAL SETTING

The Project site is within the City’s SOI; however, outside of the existing City limit. As part of the Project, a request for annexation to the City limit was proposed by the applicant. The site is within the Loma Vista Specific Plan and was anticipated for residential development. The surrounding uses are a mix of urban residential, and rural residential. Newer residential development has either been previously approved and/or under construction surrounding the site to the north, south, and west. East of the site is within the County of Fresno and not within the City’s SOI.

DISCUSSION

- a) *Would the project physically divide an existing community?*

Less-Than-Significant Impact. Although the site is currently vacant and undeveloped, the general area is urbanized with a mix of existing residential at varying densities.

¹⁵ North Kings Groundwater Sustainability Agency, <https://www.northkingsgsa.org>, accessed on Friday, May 1, 2020.

Typically, physically dividing existing communities is associated with the construction of a new road intersecting an established area or introducing uses that are not necessarily in line with the existing uses and planned land uses of the area. However, the Project site has been previously designated in the Clovis General Plan and Loma Vista Specific Plan for residential use. Further, as part of the Project, new sidewalks, and roadways would be constructed providing greater connectivity in that area of Clovis. In addition, the Project includes a bridge across Dog Creek, which would serve the site, as well as a linkage to other surrounding development to provide better circulation.

Consequently, because the Project is the type of use previously planned for this site and the general areas, it would not physically divide an existing community. Rather, it seeks to complement and enhance the connectivity of the area with installation of a new public sidewalk and bicycle lanes. Therefore, a **less-than-significant** impact would occur and no mitigation measures are required.

- b) *Would the project cause a 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?*

Less-Than-Significant Impact. As mentioned, the site was previously planned and anticipated for residential development. The Project is a request to construct 217 single-family homes which is consistent with the planned land use for the site. Further, as part of the Project, the remaining portions of the total acreage would be rezoned for park space, which is consistent with the 2014 Clovis General Plan and Loma Vista Specific Plan. Further, through the review and entitlement process, the Project is reviewed for compliance with applicable regulations, including those intended for avoiding or mitigation an environmental effect. For example, the Project would be required to comply applicable lighting, landscape, and noise standards, which are regulated through the Clovis Municipal Code to ensure minimal impacts to the environment as well as with neighboring properties.

As a result of the Project in complying with the land use and zoning designation, as well as the review process ensuring General Plan and other applicable policies are adhered to, the Project would result in a **less-than-significant** impact with regards to conflicting with a land use plan.

12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

ENVIRONMENTAL SETTING

The City of Clovis 2014 General Plan EIR defines minerals as any naturally occurring chemical elements or compounds formed from inorganic processes and organic substances.¹⁶ The 2014 General Plan EIR indicates that there are no active mines or inactive mines within the Plan Area of the City of Clovis.

DISCUSSION

a) *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

No Impact. As stated above, the City of Clovis does not have any active mines or inactive mines. Further, the Project site is an infill site within the City and is not zoned, designated, or otherwise mapped for mineral resource extraction, or for having mineral resources of value to the region present on or below the surface of the site. Therefore, **no impact** would occur and no mitigation measures are required.

b) *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

No Impact. Please refer to the discussion under Section 12.a.

13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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 applicable standards of other agencies?			X	
b. Generation of excessive groundborne vibration or groundborne noise levels?			X	
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, would the project expose people residing or working in the project area to excessive noise levels?				X

¹⁶ 2014 Clovis General Plan EIR, Chapter 5: Mineral Resources, page 5.11-1.

ENVIRONMENTAL SETTING

The Project site is located on a vacant and undeveloped site surrounded by existing residential development. Further, the site is bound by existing roadways (Shaw, Barstow, and Leonard Avenues). As such, existing ambient noise levels are typical of that of residential uses. There is also the Enterprise Canal trail near the site to the north which portions of it will be constructed in the near future as part of previously approved projects. As such, existing ambient noise levels in the surrounding area would consist of passive and active recreation, vehicular traffic, and other common noise associated with residential uses (i.e. lawn mowers, recreation, garden equipment, etc.)

DISCUSSION

- a) *Would the project result in 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 applicable standards of other agencies?*

Less-Than Significant Impact. The Project would include development of an existing vacant and undeveloped site. Thus, the Project would result in a temporary and permanent increase in ambient noise levels as a result of construction activities. However, as mentioned above, the Project site is surrounded by existing residential development. Therefore, while the Project would introduce new ambient noise from the construction of and operation of the single-family homes, these noises would be typical of that of the surrounding area and would not represent the type of noise levels that would drastically differ from what already exists.

Further, the City of Clovis Municipal Code Section 9.22.080, Noise, sets forth noise standards for development which would need to be complied with. For example, construction would only be permitted between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between 9 a.m. and 5:00 p.m. on weekends. However, between June 1 and September 15, construction may begin at 6 a.m. on weekdays.

The Projects proposes a minimum 6-foot high wood fence along the eastern, and southern property lines to serve as a buffer between the Project and the existing residential to the east, and future residential to the south. Properties along the Dog Creek are proposed to have a 6 foot high tubular steel fence. Properties adjacent to the neighborhood park would have a masonry wall along the side property line to buffer from noise.

Consequently, because the Project site is in an area previously planned for and already surrounded by similar uses, and because construction noise would be temporary in nature, the potential for a substantial increase in ambient or temporary noise increases is considered **less-than-significant** and no mitigation measures are required.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less-Than Significant Impact. The Project includes development of 217 single-family homes on an existing vacant and undeveloped parcel. Therefore, construction equipment typical of the development of residential homes would be utilized temporarily. This equipment could include the use of tractors, trucks, and other construction equipment, however, this type of equipment isn't typically associated with excessive groundborne vibration.

If any vibration were to occur, it's likely that it would be temporary in nature and not at levels that would significantly impact the surrounding area. Further, the Project would be required to comply with the provisions of Section 9.22.090 of the Clovis Municipal Code which requires that vibration not be

perceptible along property lines and that it shall not interfere with operations or facilities on adjoining parcels. It's important to note also that temporary construction vibration and noise is exempt from these provisions due to the fact that construction is temporary. Overall, because the type of equipment likely to be used in the development of the Project is not considered to be of the type and intensity to result in substantial vibration or groundborne noise, the impact would be **less than significant** and no mitigation measures are required.

- 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, would the project expose people residing or working in the project area to excessive noise levels?*

No Impact. The Project is not located within the vicinity of a private airstrip or within an airport land use plan nor is the site within two miles a public airport. Therefore, **no impact** would occur.

14. POPULATION AND HOUSING

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

ENVIRONMENTAL SETTING

The Project is located on a site previously planned for residential use in the 2014 Clovis General Plan. As mentioned in the Project Description above, the site has an existing land use designation of Low Density Residential which allows for 2.1 to 4.0 dwelling units per acre (DU/Ac) which is being proposed to increase to the Medium Density Residential land use designation allowing for a density of 4.1 to 7.0 DU/Ac. The Project proposes a density of approximately 6.50 DU/Ac.

DISCUSSION

- a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example through extension of roads or other infrastructure)?*

Less-Than-Significant Impact. As mentioned, the Project would result in a density of approximately 6.5 DU/Ac which is within the Medium Density land use designation under the 2014 Clovis General Plan. While the proposed Project is at a slightly higher density than previously planned for, this small increase from the Low Density designation to Medium Density designation is not considered to be a “substantial” increase from what was previously planned. Further, unplanned population growth is typically associated with providing new services in remote areas of the City or other infrastructure that was not previously identified in the General Plan. The Project site itself as well as the surrounding areas within the City limit and SOI were planned to accommodate residential uses, thus, the infrastructure (i.e. road network, utilities, sidewalks, etc.) is already in place and/or has been recently approved through other neighboring projects, as planned for in the 2014 General Plan. Although the Project would result in new housing units and population to the site, this growth was previously planned and anticipated under the 2014 General Plan. Thus, a **less-than-significant** impact would occur and no mitigation measures are required.

- b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. The Project site is currently vacant and undeveloped. There are no existing homes, or people currently living on the site, therefore, the Project would not result in the substantial displacement of existing people or housing. Although the overall Project area does include a home on the west side of Dog Creek, other than the rezone to that property, no structures or other improvements are occurring on that portion as part of this Project. Therefore, **no impact** would occur and no mitigation measure are required.

15. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:</i>				
a. Fire protection?			X	
b. Police protection?			X	
c. Schools?			X	
d. Parks?			X	
e. Other public facilities?			X	

ENVIRONMENTAL SETTING

The Project is located in an area surrounded by existing residential uses and currently lies outside of the City limit. The Project includes a request to annex to the City limit, at which time would enter into the City's service area for police, and fire protection services. As mentioned above in the Population and Housing and Land Use and Planning sections, the Project site was previously planned for residential development. The Project would be served by the Clovis Fire Department, Clovis Police Department, with mutual aid from the City of Fresno, when needed. The Project site would also be within the Clovis Unified School District.

The nearest fire station is Fire Station #4, located a short distance (approximately 3.0 miles) west of the site. The Clovis Police Department is located approximately 4 miles west of the site.

DISCUSSION

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?*

Less-Than-Significant Impact. Although the Project would result in 217 new residential units to the area, the site is located in a relatively urbanized area. Also, the site itself is in close proximity to Fire Station's #4, which would mean that response times should be able to be maintained during calls for service. The Clovis Fire Department already serves several neighborhoods immediately adjacent to the site and would likely continue to provide adequate services to the site. As part of the entitlement process for the Project, the Clovis Fire Department will review the design and site layout to ensure adequate fire safety measures and site circulation are achieved. This would include placement of new fire hydrants in certain locations throughout the site, adequate drive widths for fire truck and emergency vehicle access, and the appropriate application of fire codes, such as installation of sprinkler systems, fire alarms, and smoke detectors. Overall, with the sites close proximity to numerous fire stations, construction that would meet the latest fire code standards, and review by the Clovis Fire Department, impacts related to effects on the performance of the Fire Department would be **less-than-significant** and no mitigation measures are required.

- b) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?*

Less-Than-Significant Impact. Although the Project would result in 217 new residential units to the area, the site is located in a relatively urbanized area, much of which is currently served by the Clovis Police Department. The Clovis Police Department headquarters are located at 1233 Fifth Street, which is just approximately four (4) miles from the site. As part of the entitlement process for the Project, the Clovis Police Department will review the design and site layout to ensure adequate safety measures are achieved. Lastly, the site is located in an already urbanized area serviced by the Clovis Police Department, and thus access to and from the site would be similar to existing conditions when responding to calls for services. Consequently, a **less-than-significant** impact would occur and no mitigation measures are required.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental*

facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?

Less-Than-Significant Impact. Although the Project would result in 217 new residential units to the area, the site is located in an urbanized area within the Clovis Unified School District (CUSD). As part of the review process, CUSD is provided the opportunity to comment and work closely with the City as development is proposed. As mentioned previously, the Project site was previously planned and anticipated for Low Density Residential, as indicated in the 2014 Clovis General Plan; however, is being requested to increase to the Medium Density land use designation. As part of the process, the Project would be required to pay school fees which typically go towards the improvement and/or construction of new schools or expanding existing schools if and when needed, as determined by the CUSD. Although the CUSD provided a letter indicating a concern with the increase in density, the payment of school fees has been deemed adequate under CEQA for purposes of offsetting potential impacts to schools. Therefore, because the Project would be subject to payment of school fees which are intended to go towards the future expansion, modification, and/or construction of schools, a **less-than-significant** impact would occur and no mitigation measures are required.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

Less-Than-Significant Impact. See discussion under Section 16, Recreation for the analysis related to parks.

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

Less-Than-Significant Impact. Although the Project would result in 217 new residential units, residential uses have been previously planned for in the 2014 Clovis General Plan. Further, through the entitlement process, the Project would undergo review by several departments and agencies for compliance with appropriate regulations and policies. This could result in various impact fees that are intended to maintain and enhance public facilities as appropriate. While additional units may increase use of governmental facilities, such as libraries, these changes are not considered substantial since residential uses were previously planned for. Further, as technology use continues to increase and become more prevalent in daily lives, physical impacts to facilities such as public libraries are not as significant. Further, payment of the typical development fees which are intended to offset impacts to facilities, as well as project review by the different department and agencies, would result in the Project having a **less-than-significant** impact to public facilities. No mitigation measures are required.

16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------	--------------------------------	--	------------------------------	-----------

<p>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?</p>			X	
<p>b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?</p>			X	

ENVIRONMENTAL SETTING

The Project is located on a site surrounded by existing residential and rural residential development, as well as areas that were recently entitled for residential. The nearest park to the site is approximately ½ mile west of the site. The Project site is also near the location of the Loma Vista park which is currently being planned, and would be an approximately 7-acre park site approximately ¾-mile southwest of the site.

DISCUSSION

- 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?*

Less-Than-Significant Impact. As mentioned in the Population and Housing section of this Initial Study, the Project is generally consistent with the type of development anticipated on the site. Although 217 new housing units would be constructed, therefore, adding new population to the area that may utilize parks within the surrounding area, this growth was planned for with regards to park usage throughout the city. Further, the Project itself would include landscaped areas and open space areas on-site for its residents, thereby, providing areas of recreation within the site. This includes landscaped front yards for the homes, and linear park space along Dog Creek, as well as a smaller open space area along the northern tip of the Project site. The Project is also within close proximity to the Enterprise Canal trail which would be utilized for recreational activities. The Project would also be required to comply with General Plan Policy 2.2 of the Open Space and Conservation Element which encourages the incorporation of on-site natural resources.

Overall, because the type of use was previously accounted for in the 2014 General Plan with regards to parks, and because the Project incorporates on-site open space and amenities, the Project is not likely to increase the use of existing parks such that physical deterioration would occur. Therefore, the impact would be **less-than-significant** and no mitigation measures are required.

- b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?*

Less-Than-Significant Impact. The Project site itself would construct on-site open space areas and amenities for its residents. It is not likely that the Project itself would require the construction or expansion of new recreational facilities that would have an adverse physical effect on the environment. The Project would also be required to contribute a proportionate share towards the acquisition and development of future parks in order for the City to maintain its adopted ratio of providing four (4) acres of parkland per 1,000 residents, as stated in Policy 1.1 in the Open Space and Conservation Element of the 2014 General Plan, and Section 3.4.03 of the Clovis Municipal Code. As such, a **less-than-significant** impact would occur and no mitigation measures are required.

17. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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?		X		
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d. Result in inadequate emergency access?			X	

ENVIRONMENTAL SETTING

The site is in area near Leonard, Shaw, and Barstow Avenues, and would be accessed by Agua Dulce Ave via Barstow Avenue. The site is bounded by existing single-family residential to the north, east, and west, as well as by a vacant parcel to the south which has an approved tentative tract map although has not yet been constructed.

According to the 2014 Clovis General Plan Circulation Diagram in the Circulation Element (Figure C-1 of the Circulation Element), Shaw and Leonard Avenues are classified as arterial streets, and Barstow and Agua Dulce are local streets. Arterial streets are designed to move large volumes of traffic and are intended to provide a high level of mobility between freeways, expressways, and other arterials and collector roadways. Local streets are intended to provide direct access to abutting land uses and serve short distance trips within neighborhoods.

A Traffic Impact Assessment (TIA) was prepared by JLB Traffic Engineering, Inc. on May 26, 2020 (included as Appendix D of this Initial Study). The information and analysis in the following sections is based in part on the results of the TIS.

DISCUSSION

- a) *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Less-Than-Significant Impact With Mitigation. As mentioned above, the site is within a relatively urbanized area that was previously planned for residential development by 2014 Clovis General Plan. The Project proposes a density of approximately 6.5 DU/Ac which is within the allowable density range of the Medium Density land use designation. Although the existing land use designation is Low Density Residential, the Applicant requests an increase to the Medium Density land use designation.

As a result of the proposed increase, preparation of a TIA was required to assess the potential impacts to the circulation network beyond what was previously anticipated under the 2014 Clovis General Plan. The TIA studied six intersections: 1) Leonard Avenue/Bullard Avenue; 2) Leonard Avenue/Barstow Avenue; 3) DeWolf Avenue/Shaw Avenue; 4) Leonard Avenue/Shaw Avenue; 5) Thompson Avenue/Shaw Avenue; and 6) McCall Avenue/Shaw Avenue, for existing conditions, existing-plus-project conditions, near term with project conditions, and cumulative conditions to the year 2040. A discussion of each of these scenarios is included below.

Each scenario is based on the Projects a.m. and p.m. peak hour trips as determined in the TIA. According to the TIA, the Project would result in 161 trips in the a.m. peak hours of between 7 a.m. and 9 a.m. and 216 trips in the p.m. peak hours between 4 p.m. and 6 p.m., as well as a total of 2,058 daily vehicle trips.

Existing Traffic Conditions

Existing traffic volumes evaluates the existing traffic conditions without the Project. This scenario relied upon existing and historical traffic volumes and roadway conditions from traffic counts and field surveys conducted in 2017, 2019, and 2020. According to the TIA, the study intersections operate at an acceptable level of service (LOS) under existing conditions.¹⁷

Existing Plus Project Conditions

Under this scenario, traffic volumes and roadway conditions are based on the existing traffic conditions plus what the Project would add in the opening year. Because the Project includes a request to change the land use designation from Low Density Residential to Medium Density Residential, this scenario analyzed the difference in traffic volumes based on that request. As a result of the Project compared to what would be allowed by-right under the lands existing General Plan land use designation, there would be an increase in total daily trips by 793, including 62 a.m. and 83 p.m. peak hour trips. Although there would be an increase in overall traffic volumes from what was previously anticipated, all study intersections would continue to operate at an acceptable LOS under this scenario.¹⁸

Near Term Plus Project Conditions

Under this scenario, traffic volumes and roadway conditions in the near term (following opening year) with the addition of the Project. Under this scenario, the TIA determined that the intersection of Leonard and Shaw Avenues would exceed an acceptable LOS; however, implementation of Mitigation Measure TRAF-1 would reduce this impact to less than significant.¹⁹

17 Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 1.

18 Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 2.

19 Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 2.

Mitigation Measure TRAF-1: The Applicant and/or Project proponent shall contribute their proportional share of traffic impact fees for the following future improvements at the following intersection(s):

Leonard Avenue/Shaw Avenue

- Add an eastbound left-turn lane;
- Modify the eastbound left-through-right lane to a through-right lane;
- Add a westbound left-turn lane;
- Modify the westbound left-through-right lane to a through-right lane;
- Modify the northbound left-through lane to a left-turn lane;
- Stripe a northbound through lane;
- Add a southbound left-turn lane;
- Modify the southbound left-through-right lane to a through lane;
- Add a southbound right-turn lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

Cumulative 2040 No Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the cumulative year 2040 without the Project. Under this scenario, the TIA determined that the intersections of Leonard Avenue and Bullard Avenue, Leonard Avenue and Barstow Avenue, DeWolf Avenue and Shaw Avenue, Thompson Avenue and Shaw Avenue, and McCall Avenue and Shaw Avenue would exceed the acceptable LOS; however, implementation of Mitigation Measure TRAF-2 would reduce this impact to less than significant.²⁰

Mitigation Measure TRAF-2: The Applicant and/or Project proponent shall contribute their proportional share of traffic impact fees for the following future improvements at the following intersection(s):

Leonard Avenue/Bullard Avenue

- Add an eastbound left-turn lane;
- Modify the eastbound left-through-right lane to a through lane;
- Add an eastbound right-turn lane;
- Add a westbound left-turn lane;
- Modify the westbound left-through-right lane to a through-right lane;
- Modify the southbound through-right lane to a through lane;
- Add a southbound right-turn lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

Leonard Avenue/Barstow Avenue

- Add a westbound left-turn lane;
- Modify the westbound left-through-right lane to a through-right lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

DeWolf Avenue/Shaw Avenue

- Modify the northbound through-right lane to a through lane;
- Add a northbound right-turn lane; and
- Modify the traffic signal to accommodate the added lane.

Thompson Avenue/Shaw Avenue

- Modify the northbound left-right lane to a left-turn lane;

²⁰ Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 2.

- Add a northbound right-turn lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

McCall Avenue/Shaw Avenue

- Modify the westbound through-right lane to a through lane;
- Add a westbound right-turn lane;
- Add a northbound left-turn lane;
- Modify the northbound left-through-right lane to a through lane;
- Add a northbound right-turn lane;
- Add a southbound left-turn lane;
- Modify the southbound left-through-right lane to a through lane;
- Add a southbound right-turn lane; and
- Modify the traffic signal to accommodate the added lanes.

Cumulative 2040 Plus Project Traffic Conditions

This scenario evaluates total traffic volumes and roadway conditions based on the cumulative year 2040 with the Project. Under this scenario, the TIA determined that the intersections of Leonard Avenue and Bullard Avenue, Leonard Avenue and Barstow Avenue, DeWolf Avenue and Shaw Avenue, Thompson Avenue and Shaw Avenue, and McCall Avenue and Shaw Avenue would exceed the acceptable LOS; however, implementation of Mitigation Measure TRAF-3 would reduce this impact to less than significant.²¹

Mitigation Measure TRAF-3: The Applicant and/or Project proponent shall contribute their proportional share of traffic impact fees for the following future improvements at the following intersection(s):

Leonard Avenue / Bullard Avenue

- Add an eastbound left-turn lane;
- Modify the eastbound left-through-right lane to a through lane;
- Add an eastbound right-turn lane;
- Add a westbound left-turn lane;
- Modify the westbound left-through-right lane to a through-right lane;
- Modify the southbound through-right lane to a through lane;
- Add a southbound right-turn lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

Leonard Avenue / Barstow Avenue

- Add a westbound left-turn lane;
- Modify the westbound left-through-right lane to a through-right lane; and
- Signalize the intersection with protective left-turn phasing in all directions.

DeWolf Avenue / Shaw Avenue

- Modify the northbound through-right lane to a through lane;
- Add a northbound right-turn lane; and
- Modify the traffic signal to accommodate the added lanes.

Thompson Avenue / Shaw Avenue

- Modify the northbound left-right lane to a left-turn lane;
- Add a northbound right-turn lane; and

²¹ Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 2.

- Signalize the intersection with protective left-turn phasing in all directions.

McCall Avenue / Shaw Avenue

- Modify the westbound through-right lane to a through lane;
- Add a westbound right-turn lane;
- Add a northbound left-turn lane;
- Modify the northbound left-through-right lane to a through lane;
- Add a northbound right-turn lane;
- Add a southbound left-turn lane;
- Modify the southbound left-through-right lane to a through lane;
- Add a southbound right-turn lane; and
- Modify the traffic signal to accommodate the added lanes.

Queuing Analysis

A left-turn and right-turn lane queuing analysis was also performed to determine the queuing lengths at the study intersections to determine the level of impact. Based on the TIA, the existing capacity for turning movements at the study intersections is sufficient to accommodate the maximum queue of traffic with buildout of the Project.²²

Overall, the Project itself would help to facilitate improved circulation by adding vehicular and pedestrian infrastructure throughout the Project site for connectivity to adjacent areas currently under construction and/or planned for future residential development. Further, as part of conditions of approval of the Project, a vehicular bridge would be constructed over Dog Creek for access to the site. Lastly, implementation of Mitigation Measures TRAF-1 through TRAF-3 would reduce the potential for significant traffic impacts by ensuring that payment of fair share costs be assessed for future traffic control at the intersections identified above.

While the level of service at certain intersections would be slightly exacerbated with the Project, Policy 2.1 in the Circulation Element of the General Plan allows exceptions to LOS on a case-by-case basis where a project would result in other public benefits. In the case of the Project, development of an infill property at a medium density would provide a public benefit by creating a pedestrian-friendly environment on a site that is otherwise vacant and undeveloped, while providing infrastructure for that area to facilitate better vehicular and pedestrian circulation. Further, the Project includes rezoning approximately 18 acres to Open Space which is a crucial step to the eventual buildout of park space in the future. Consequently, implementation of Mitigation Measures TRAF-1 to TRAF-3 would ensure that a **less-than-significant with mitigation** impact occur.

- b) *Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less-Than-Significant Impact. Under Senate Bill 743 (SB743), starting July 2020, projects will be required to assess traffic impacts based on Vehicle Miles Traveled (VMT), which is the amount and distance of automobile travel attributable to a project, as opposed to the existing Level of Service (LOS) method, which measures vehicle delays. As such, VMT is not required to be assessed until July 2020. The Project is consistent with General Plan Policy 1.4 of the Circulation Element, which encourages infill development for the purpose of reducing VMT. Further, the City Engineer analyzed the Project and

22 Traffic Impact Assessment, Tentative Tract No. 6304, JLB Engineering, Inc., May 26, 2020, page 37.

concluded that the current and proposed improvements can accommodate the additional traffic. Overall, the Project would result in a **less-than-significant** impact.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less-Than-Significant Impact. The Project would result in a significant impact if it would include features that would create a hazard such as a sharp curve in a new roadway, or create a blind corner or result in sight distance issues from entryways. Through the entitlement process, the Project would undergo review by multiple City departments, such as planning and engineering, to ensure that the site layout conforms to existing regulations, such as the City Development Code, and other applicable codes, such as the fire code and building code. During this review, the Project would need to make the necessary corrections to ensure that no hazardous design features would result from the Project. Further, the main roadway network (i.e. Leonard Avenue, Shaw Avenue, and Barstow Avenue) was previously constructed to City roadway standards. Although new roadways would be constructed to serve the site, including a bridge over Dog Creek, this infrastructure would be reviewed by City engineering staff and building staff to ensure they are designed and constructed to applicable standards. Therefore, because the Project would undergo site plan and design review to ensure consistency and adherence to applicable design and site layout guidelines, a **less-than-significant** impact would occur.

- d) *Would the project result in inadequate emergency access?*

Less-Than-Significant Impact. The Project would include two ingress/egress access points, including the main entrance along the proposed bridge off of Agua Dulce, as well as a temporary roadway at the south end of the Project providing access to and from Shaw Avenue. As part of the Project review, the Clovis Fire Department would review all plans to ensure adequate emergency access is provided. This review includes review for adequate roadway widths, turning radii, as well as adequate access to units and accessibility to water. Consequently, because the Project plans would be required by the Clovis Municipal Code to be reviewed and approved by Clovis Fire Department and Police Department prior to construction, this impact would be **less than significant** and no mitigation measures are required.

18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. 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)?				X

<p>b. 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 Resources Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe?</p>		X		
---	--	---	--	--

ENVIRONMENTAL SETTING

On September 25, 2014, Governor Jerry Brown signed Assembly Bill AB52, which intends to protect a new class of recourse under CEQA. This new class is Tribal Cultural Resources and provides an avenue to identify Tribal Cultural resources through a consultation process, similar to SB18. However, unlike SB18, where consultation is required for all General Plan and Specific Plan Amendments, AB52, applies to all projects where a Notice of Determination is filed. Furthermore, the consultation process is required to be complete prior to filing a Notice of Intent.

On February 11, 2020, consistent with AB52, invitations to consult on the Project were mailed to thirteen (13) tribes within the area. According to AB52, tribes have up to thirty (30) days to request consultation, at which time the City would set up a consultation. No requests for consultations were made during that time. Similarly, SB18 notices were sent out on the same day to allow tribes up to ninety (90) days to request consultation for the Project related to the request for General Plan amendment. No requests for consultations were made during that time.

A cultural resources assessment was prepared by Peak & Associates, Inc., on February 14, 2020 (see Appendix C). This assessment was based on information obtained at the Southern San Joaquin Valley Information Center, CSU Bakersfield, as well as a field assessment for observations.

DISCUSSION

- a) *Would the project cause a substantial adverse change to a 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)?*

No Impact. As mentioned in the Project Description, the Project site is currently vacant and undeveloped. There are no existing structures or features on the site that are listed or eligible in the California Register of Historical Resources, or in a local register. As such, the Project would have **no impact** and no mitigation measures are required.

- b) *Would the project cause a substantial adverse change to 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 Resources Section 5024.1 for the purposes of this*

paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe?

Less-Than-Significant Impact With Mitigation. As mentioned above, the City invited 13 Native American tribes to consult on the Project under AB52, and no tribes requested consultation within the 30-days afforded to respond under AB52. The Project site is currently vacant and undeveloped, and would require trenching and ground-disturbing activities during construction for the installation of utility infrastructure needed to serve the Project. As described in the cultural resources report prepared for the Project, there were no known resources identified at the site. Nevertheless, the potential remains that cultural resources could be inadvertently discovered during ground-disturbing activities. However, implementation of Mitigation Measures TCR-1 and TCR-2 below would reduce potential significant impacts and ensure protection in the event of accidental discovery of any cultural resources. With Mitigation Measure TCR-1 and TCR-2, impacts would be **less-than-significant with mitigation**.

Mitigation Measure TCR-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified professional archaeologist/tribal representative, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, can evaluate the significance of the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock as well as historic resources such as glass, metal, wood, brick, or structural remnants.

If the qualified professional archaeologist/tribal representative determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from project implementation. These additional studies may include avoidance, testing, and evaluation or data recovery excavation.

If a potentially-eligible resource is encountered, then the qualified professional archaeologist, the Lead Agency, and the project proponent shall arrange for either 1) total avoidance of the resource or 2) test excavations to evaluate eligibility and, if eligible, total data recovery. The determination shall be formally documented in writing and submitted to the Lead Agency as verification that the provisions for managing unanticipated discoveries have been met.

Mitigation Measure TCR-2: If human remains are discovered during construction or operational activities, further excavation or disturbance shall be prohibited pursuant to Section 7050.5 of the California Health and Safety Code. The specific protocol, guidelines, and channels of communication outlined by the Native American Heritage Commission, in accordance with Section 7050.5 of the Health and Safety Code, Section 5097.98 of the Public Resources Code (Chapter 1492, Statutes of 1982, Senate Bill 297), and Senate Bill 447 (Chapter 44, Statutes of 1987), shall be followed. Section 7050.5(c) shall guide the potential Native American involvement, in the event of discovery of human remains, at the direction of the County coroner. All reports, correspondence, and determinations regarding the discovery of human remains on the project site shall be submitted to the Lead Agency.

19. UTILITIES AND SERVICE SYSTEMS

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

ENVIRONMENTAL SETTING

Pacific Gas & Electric (PG&E) provides electricity and natural gas services in the City of Clovis. AT&T/SBC provides telephone service to the City.

The City's water supply sources include groundwater drawn from the Kings Sub-basin of the San Joaquin Valley Groundwater Basin and treated surface water from the Fresno Irrigation District (MID). Surface water is treated at the City of Clovis Surface Water Treatment Facility.

The City of Clovis provides sewer collection service to its residents and businesses. Treatment of wastewater occurs at the Fresno-Clovis Regional Wastewater Treatment Plant (RWTP). The Fresno-Clovis RWTP is operated and maintained by the City of Fresno and operates under a waste discharge requirement issued by the Central Valley Regional Water Quality Control Board. Additionally, the City of Clovis has completed a 2.8 mgd wastewater treatment/water reuse facility, which will service the City's new growth areas.

The Fresno Metropolitan Flood Control District (FMFCD) has the responsibility for storm water management within the Fresno-Clovis metropolitan area of the Project site. Stormwater runoff that is generated by land development is controlled through a system of pipelines and storm drainage detention basins.

DISCUSSION

- a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less-Than-Significant Impact. The Project includes construction of 217 home units. As mentioned above, the site is of the type of use that was previously anticipated for this location, thus, previously accounted for in the 2014 Clovis General Plan. Although the Project requests an increase in density from Low Density to Medium Density, as part of the review process for the Project, the water and wastewater impacts will be evaluated by the City Engineer to ensure compliance with the City's Waste Water Master Plan, as well as FMFCD, so that the Project would not exceed wastewater treatment requirements such that a new facility would be required nor would the existing treatment facility need to be expanded. Upon review and approval by the City Engineer, the Project would result in a **less-than-significant** impact.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Less-Than-Significant Impact. The Project is of the type of development previously accounted for in the 2014 Clovis General Plan, and is on an infill site surrounded with existing urban and rural residential uses which are served adequately with City water. Because of a request to increase density and annex to the City, a water supply assessment was required and the City engineer determined that it has sufficient capacity to accommodate the Project. Further, the Project would comply with current Green Building Codes, as well as the water efficient landscape policies with regards to water conserving features. Further, the Project would be required to comply several water conserving policies, such as Policy 3.4 and 3.5 of the Open Space and Conservation Element. Overall, a **less-than-significant** impact would occur.

- c) *Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less-Than-Significant Impact. Because the Project is of the type previously planned and accounted for in the 2014 Clovis General Plan, it is not likely that the Project would result in a demand that would exceed the capacity of the wastewater treatment facility. A sewer study was prepared for the Project which determined that the City's system had sufficient capacity to accommodate buildout of the Project. Further, because permanent wastewater infrastructure is not yet planned to reach the site at this time, the applicant proposed construction of a temporary lift station to be able to adequately convey wastewater to and from the site until such time it is feasible for permanent infrastructure to connect to the City

wastewater system. With construction of the lift station by the applicant/developer, the wastewater system would be adequate. For that reason, the impact would be **less than significant**.

- d) *Would the project 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?*

Less-Than-Significant. The Project would introduce new solid waste throughout construction and operation of the Project. However, the Project would be required to comply with Chapter 6.3.1, Recycling and Diversion of Construction and Demolition Debris, of the Clovis Municipal Code during construction. This section of the Clovis Municipal Code requires that a minimum of fifty percent (50%) of waste tonnage from a project be diverted from disposal, and that all new residential (and commercial) construction within the City shall submit and obtain approval for a waste management plan prior to construction activities. Compliance with these measures would ensure that the Project does not result in a significant impact during the construction phase of the Project. Further, compliance with policies in the General Plan for the reduction and recycling of solid waste would serve to reduce impacts of solid waste by promoting and encouraging the recycling of materials. Lastly, according to the California Department of Resources Recycling and Recovery (CalRecycle, the City of Clovis has exceeded their target per resident disposal rate of 4.7 pounds per day per resident, meaning that Clovis residents are actually producing less solid waste than the target set by the State.²³ Consequently, a **less-than-significant** impact would occur.

- e) *Would the project comply with federal, state, and local management reduction statutes and regulations related to solid waste?*

Less-Than-Significant. See discussion 19d above.

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 With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
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 a wildfire?			X	
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			X	

²³ Calrecycle, City of Clovis, <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>, accessed May 18, 2020.

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?				X

ENVIRONMENTAL SETTING

The Project site is located on a site surrounded by existing urban and rural residential uses. The site’s topography is generally flat and characterized primarily by low lying shrubs and grasses.

DISCUSSION

- a) *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Less-Than-Significant Impact. The Project is located at a site that is surrounded by existing development. Further, the main road network is already in place from previous development (i.e. Shaw, Barstow, and Leonard Avenues). Although the Project could result in temporary traffic detouring or closures during buildout, these delays would be temporary and would be coordinated with the City engineering department and other departments to ensure safe access to and from the area is maintained. Further, the site itself would reviewed by City departments to ensure adequate site access and circulation is provided in the event of an emergency. Lastly, the Project would serve to increase circulation in the area and the surrounding neighborhoods by constructing a roadway throughout the site, as well as a bridge over Dog Creek providing a linkage from surrounding neighborhoods. Thus, the Project would result in greater porosity in the overall circulation system of the area which would provide increased access. Overall, a **less-than-significant** impact would occur.

- b) *Would the project, 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 a wildfire?*

Less-Than-Significant Impact. The Project site is flat and undeveloped, surrounded by existing urban and rural residential uses. The general vicinity of the site is flat, therefore, is not of the type of topography nor in a location likely to exacerbate wildfire risks caused by winds or slopes. Further, the Project would be required to comply with the latest fire codes and would be required to include sprinklers on the interior of the homes and require installation of several hydrants throughout the site. Lastly, the site plans would undergo review by the Clovis Fire Department to ensure that all fire safety regulations are met. Therefore, a **less-than-significant** impact would occur.

- c) *Would the project 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?*

Less-Than-Significant Impact. The site is located in an area previously developed with urban and rural residential uses. As a new development, installation of a new roadway network, water lines, and power lines would be required; however, these utilities and infrastructure are typical of residential development

and would be constructed to standards of the respective agencies and departments which oversee them, as well as be required to comply all necessary plan review and permitting requirements of such departments and agencies. As such, a **less-than-significant** impact would occur.

- d) *Would the project 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?*

No Impact. The City of Clovis is generally flat topography, and the site itself is in an area that is not in close proximity to hillsides such that it would expose people or structures to significant risks associates with downstream flooding or landslides as a result of runoff or post-fire slope instability. As such, **no impact** would occur.

21. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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 a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?			X	
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?			X	

ENVIRONMENTAL SETTING

The Project is located on an infill site within the City of Clovis, substantially surrounded by existing development consisting residential uses.

DISCUSSION

- 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 a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?*

Less-Than-Significant Impact. As discussed above throughout the Initial Study, the Project would not result in any significant impacts with implementation of mitigation measures prescribed above. Therefore, the Project would have a **less-than-significant** impact as it would not substantially degrade the quality of the environment.

- 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)?*

Less-Than-Significant Impact. The Project includes mitigation measures in certain topic areas identified throughout this Initial Study which would reduce potential impacts to a less-than-significant level. None of these impacts would be cumulatively considerable since most are either temporary impacts from construction or site specific. With the exception of air quality that is generally considered measurable cumulatively, the Project was found to have a less-than-significant impact through compliance with existing regulations from the SJVPACD. As such, future Projects in Clovis would be required to comply with those same regulations, ensuring adequate mitigation as development occurs. Lastly, while the Project would introduce 217 new single-family residential units to an existing vacant site, the type of use was previously planned for in the 2014 Clovis General Plan buildout. Thus, a **less-than-significant** impact would occur.

- c) *Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?*

Less-Than-Significant Impact. As discussed throughout the document, the Project would not result in a significant impact that could not be mitigated to a less-than-significant level. Therefore, a **less-than-significant** impact would occur.

I. Report Preparation

LEAD AGENCY

Ricky Caperton, AICP

Senior Planner
City of Clovis
Planning & Development Services

TECHNICAL STUDIES

Air Quality and Greenhouse Gas Analysis Report

Bonadelle Neighborhoods Tract No. 6304
Dave Mitchell, Senior Air Quality Scientist
Mitchell Air Quality Consulting

Biological Habitat Assessment

Tract 6304
Argonaut Ecological Consulting, Inc.

Cultural Resource Assessment

Bonadelle Neighborhoods Project, Tract 6304
Melinda A. Peak
Peak & Associates, Inc.

Traffic Impact Analysis

Tentative Tract No. 6304
JLB Traffic Engineering, Inc.

