

The Well Community Church
CUP2020-006 / R2020-005 / SPR2020-008
Initial Study and Mitigated Negative Declaration

March 2021

PREPARED BY:

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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: The Well Community Church

LEAD AGENCY NAME AND ADDRESS: City of Clovis
Planning & Development Services
1033 Fifth Street
Clovis, CA 93612

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PROJECT LOCATION: NE corner of Nees and Minnewawa Avenues
Clovis, CA 93612
APN(s): 560-051-10, -23, and -25

PROJECT SPONSOR'S NAME AND ADDRESS: Jeremy Vanderlinden
Executive Pastor of Operations & Development
The Well Community Church
2044 E. Nees Avenue
Fresno, CA 93720

LAND USE DESIGNATION: Low Density and Medium High Density Residential

ZONING DESIGNATION: See page 7 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 10 of this Initial Study.

HAVE CALIFORNIA NATIVE AMERICAN TRIBES REQUESTED CONSULTATION? IF SO, HAS CONSULTATION BEGUN? Yes

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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 checked="" 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 checked="" 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 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 environmental, 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 environmental, 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

3-3-2021

Date

Approved By:



Renee Mathis, Director
City of Clovis Planning & Development Services

3/3/2021

Date

B. PROJECT OVERVIEW

Jeremy Vanderlinden, Executive Pastor of Operations & Development, of The Well Community Church (applicant), proposes the construction of a church campus totaling ±80,000 square feet along with associated site improvements (i.e. landscape, parking, sidewalks, and utilities infrastructure) on ±23 acres of an approximately 53-acre site at the northeast corner of Minnewawa and Nees Avenues in the City of Clovis, California, herein referred to throughout the document as “proposed Project” and/or “Project.” Details regarding the Project and operations are described more fully below beginning under Section E of this Initial Study.

It is important to note that while the proposed Project is only occupying a portion of the overall site, long-term future phases are not yet funded or known at this time. Therefore, while it is possible that other areas of the site may include future expansion, it is speculative at this point and no funding has been identified for long-term plans and, therefore, is not reasonably foreseeable. Any areas not described or included under the proposed Project would be subject to separate CEQA analysis if and when a “project,” as defined by CEQA, is proposed.

C. PROJECT LOCATION

As shown in Figure 1 below, the Project is located on the north side of Nees Avenue between Minnewawa and Clovis Avenues and consists of three (3) parcels totaling approximately 53 acres. The Project would occupy a total of ±23 acres either in full or portions of Assessor’s Parcel Numbers (APNs) 560-051-10 (±9 acres), 560-051-23 (±18 acres), and 560-051-25 (±26 acres).

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 consists of agricultural crops (peaches), along with a residential structure, tennis court, and commercial structures serving as a processing and shipping plant associated with Wawona Frozen Foods. The existing processing plant and the Peach Tree Fruit Stand will continue operations, as well as some limited agricultural operations. Although continued operations of the processing plant will occur, any activities associated with that use are separate from the proposed Project and are considered existing conditions for purpose of the analysis throughout this Initial Study.

The site has been historically used for farming and agricultural related uses, including a residence (i.e. house located on the corner of Minnewawa and Nees Avenue). There are no existing sidewalks or other pedestrian improvements along Minnewawa, Nees, or Clovis Avenues fronting the Project site. The site also includes mature landscaping where the house sits.

At the northern end of the greater site, there are several structures utilized for processing and shipping operations related to the farming operation that formerly took place at the site. Food processing and shipping is anticipated to continue, although is not being considered under the entitlement for the proposed Project since it is an existing use.

2. SURROUNDING CONDITIONS

As referenced below in Table 1, and shown on Figure 2, the Project site is surrounded primarily by existing residential development to the north, east, and south. Buchanan High School is located directly west of the Project site. As mentioned above, some food processing activities would continue to occur at the northern portion of the site.

Table 1: Surrounding Land Uses

	Land Use Designation	Existing Zoning*	Existing Land Use
North	Low Density Residential	R-1-7500	Single-Family Residential
East	Rural Residential	RR (County of Fresno)	Rural Residential (County of Fresno)
South	Low Density Residential	R-1-7500	Single-Family Residential
West	School	R-A	Buchanan High School
*R-1-7500 (Single-Family Residential – 7,500 square feet) R-A (Single-Family Residential – 24,000 square feet) R-R (County of Fresno) Rural Residential			

3. LAND USE DESIGNATION

As shown on Figure 3, the Project site has existing General Plan Land Use designations of Low Density and Medium High Density Residential.

4. ZONING DESIGNATION

As shown on Figure 4, the Project site is currently zoned R-A (Single-Family Residential Very Low Density). According to Table 2-2 under Section 9.10.020 of the Clovis Municipal Code (CMC) a “church” use is allowed with approval of conditional use permit (CUP). Although a church is permitted in the existing zone district, a rezone application has been filed to rezone the site to the R-1-7500 zone district to bring the zoning in conformance with the General Plan Land Use Designation. The R-1-7500 zone district is consistent with the Low Density and also permits a church subject to a CUP.

E. PROJECT DESCRIPTION

This section describes the components of the proposed Project in more detail, including operations, site preparation, proposed structures, and on- and off-site improvements. The Project proposes to utilize a combination of existing site features, such as the existing home and landscaped grounds on the immediate northeast corner of Minnewawa and Nees Avenues, as well as construct three (3) new structures, associated landscaping, utility and pedestrian infrastructure, and sports fields. Continued operation of the processing plant north of the Project, while on the same overall site, would not necessarily be part of the entitlements for the proposed church, as those operations are considered existing.

HOURS OF OPERATION

The Project proposes general hours of operation from Monday to Thursday from 9:00 am to 5:00 pm, with church services primarily on Sunday at 9:00 am, 11:00 am, and 7:00 pm. Weekday ministry times are anticipated on Mondays from 6:00 pm to 8:00 pm, Wednesdays from 6:30 pm to 8:30 pm, and Thursdays from 6:00 pm to 8:00 pm. Other church activities could occur that may not necessarily be within the specified hours identified; however, would be subject to Clovis Municipal Code (CMC) standards and regulations based on the type of event. These types of events may include special gatherings at other days and hours not specifically identified for purposes of fundraising, after school programs, trainings, weddings, funeral services, and other special events typically associated with church functions.

EMPLOYMENT

The Project would employ between ± 55 and ± 75 full-time employees in addition to volunteers based on the church programs and events that would occur. During church services, approximately 25 employees and 25 volunteers may be present, and approximately 50 employees and 15 volunteers during non-service hours for day-to-day administrative services and campus maintenance functions (i.e. landscaping, cleaning, service preparation, event planning, etc.).

CHURCH SERVICES

A typical Sunday service is anticipated to accommodate approximately 3,000 patrons total for all three (3) Sunday gatherings, and up to approximately 350 during weekday evening gatherings. The Project also includes a classroom building which would serve to hold ±500 kids at from grades kindergarten to sixth while church

gatherings are being held. The classroom would be owned and operated by The Well Community Church and may also serve as a building for other kid-related activities. The classroom building is not anticipated for paid childcare services (i.e. daycare or paid pre-school) at this time.

SPECIAL EVENTS

Special events would occur at the site including, but not limited to, weddings, fundraising events, after school programs, and other events related to a church campus; however, these events are difficult to identify the frequency at which they occur. Nonetheless, these events would adhere to CMC regulations and standards for when and how they operate to minimize potential for disturbance or disruption to surrounding areas. During these events, music could be part of the functions; however, would be subject and operate within CMC noise standards. It is anticipated that up to 50 events would occur on average each year, or one (1) event a week on average.

USE OF RESIDENCE

The site has an existing residence located at the immediate northeast corner of Minnewawa and Nees Avenues. Although nobody currently lives at this location, the structure would be used for office type uses related to the administrative functions of the church. It is also anticipated that the residence and its landscaped grounds would serve as a site for weddings and other special events. The residence is not anticipated for use as full-time living quarters.

CONTINUATION OF WAWONA FOODS

While the proposed Project would include primarily the church use, the existing site – in particular north of the church – would continue operating as a food processing and packing facility as part of Wawona Frozen Foods. However, the entitlements for the proposed Project are for the uses associated with the church only. The food processing operations is an existing use that operates and would continue operating; therefore, is not part of the Project for review.

1. PROJECT ENTITLEMENTS

The Project would include several planning entitlements, including a rezone, conditional use permit, site plan review, and potentially a lot line adjustment. The rezone is for purposes of bringing the site into conformance with the land use designation, the conditional use permit is for consideration of the church use itself, and the site plan review is required to memorialize the design and layout of the buildings. A lot line adjustment is potentially required to adjust lot lines to accommodate the proposed Project.

2. PROJECT CONSTRUCTION AND PHASING

The Project is anticipated to begin construction in the spring of 2021 with full buildout by fall of 2022. The expected phasing is shown below in Table 2. It is important to note that the phases below are estimates only and are dependent on resources available at the time. A description of each of the features are described more fully below under E4 of this Initial Study.

Table 2: Proposed Phasing of New Construction

Phasing	Building	Size	Timing*
Phase 1			
	Auditorium / Sanctuary	± 28,000 square feet	Start construction spring 2021
	Children’s Classroom	± 26,000 square feet	Start construction spring 2021
	Playfields / Courts	± 170,000 square feet (4 acres)	Start construction spring 2021
	Parking	± 515 stalls	Start construction spring 2021
Phase 2			
	Office Building	± 26,000 square feet	Start construction winter 2023

*estimated construction start date only

3. SITE PREPARATION

Site preparation would include typical grading activities to ensure an adequately graded site for drainage purposes. Part of the preparation would include the removal of any vegetation, crops, and trees necessary to accommodate the Project. Other site preparation activities would include minor excavation for the installation of utility infrastructure, for conveyance of water, sewer, stormwater, and irrigation. This would include undergrounding the canal that currently bisects the site. There are no buildings proposed for demolition as part of this Project, however, approximately 14 acres of peach tree crops would be removed.

4. PROJECT COMPONENTS

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

DEMOLITION

As mentioned under the "Site Preparation" section, there would be no structures demolished as part of the Project; however, crops would need to be removed.

CONCEPTUAL SITE LAYOUT AND ELEVATIONS

While this section discusses the general site layout and elevations, it is important to note that the actual site will be reviewed more fully during the City's Site Plan Review process. As shown in Figure 5, the Project proposes construction of three (3) free-standing structures totaling $\pm 80,000$ square feet. The auditorium / sanctuary would be approximately 28,000 square feet, while the classroom and office building would each be approximately 26,000 square-feet. There would also be ± 515 vehicle parking spaces, along with sports and recreational fields totaling approximately 600,000 square feet (14 acres).

Conceptual elevations are shown in Figures 5 and 6. As shown, "Building A," which serves as the sanctuary, proposes a maximum height of $\pm 34'-2"$ at its peak. Although conceptual at this time, the exterior has a modern look and feel with use of various metal and aluminum type materials, incorporated with wood and glass. "Building B," which would serve as the classroom, would be similar in exterior, although the maximum height would be slightly less than the main structure at a proposed height of $\pm 33'-10"$.

SITE CIRCULATION AND PARKING

The Project would be accessed via four (4) points of ingress/egress, including two along Nees Avenue, one along Minnewawa (existing access for cold storage operation), and one along Clovis Avenue. On-site parking would be provided per the CMC standards for parking spaces. Although ± 515 vehicle spaces are proposed, the final parking calculation will be reviewed during the City's Site Plan Review process. Installation of sidewalks and other pedestrian paths of travel would be required as part of the Project along the Nees and Minnewawa Avenue frontage, as well as Clovis Avenue. Although the details have not yet been provided, these features would be per City of Clovis Development Code standards and/or in compliance with Americans with Disabilities Act (ADA) requirements.

LANDSCAPE

The Project would include landscape throughout the site. Landscaped areas would generally be located along the frontage of each structure where a variety of ornamental shrubs, plants, and trees would be planted, as well as landscape in areas throughout the parking lots, consistent with the CMC. Landscape plans are typically provided during the City's Site Plan Review process at which time the proposed landscape would be reviewed for compliance with the City's water efficient landscape regulations and guidelines.

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 commercial 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. Other infrastructure would include new fire hydrants as required by the City of Clovis Fire Department. Of note, the Project would be required to underground an existing canal that bisects the site. This would be done in accordance with appropriate standards and regulations for the undergrounding of a canal.

Utilities are provided by and managed from a combination of agencies, including FID which provides the City's water supply which is then supplied to customers by the City of Clovis, 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:

- Lot Line Adjustment
- Rezone
- Site Plan Review
- Conditional Use Permit
- Grading Permit
- Building Permit
- Sign Permit
- San Joaquin Valley 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
- **Appendix B:** Biological Resources Evaluation
- **Appendix C:** Cultural Resources Survey
- **Appendix D:** Traffic Impact Study

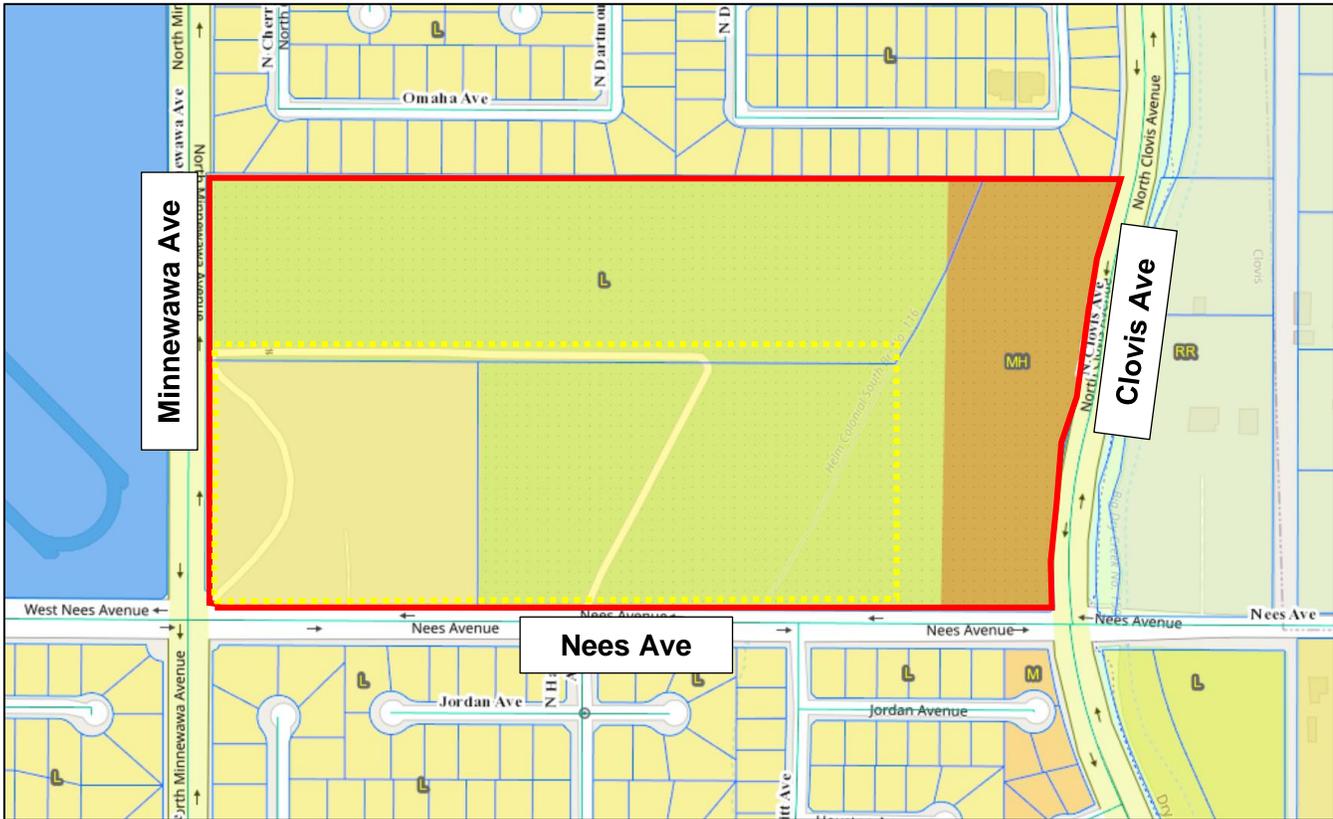
Figure 1: Project Location and Existing Conditions



-  = Total Project Area (±53 acres)
-  = Limits of Proposed Project (±23 acres)



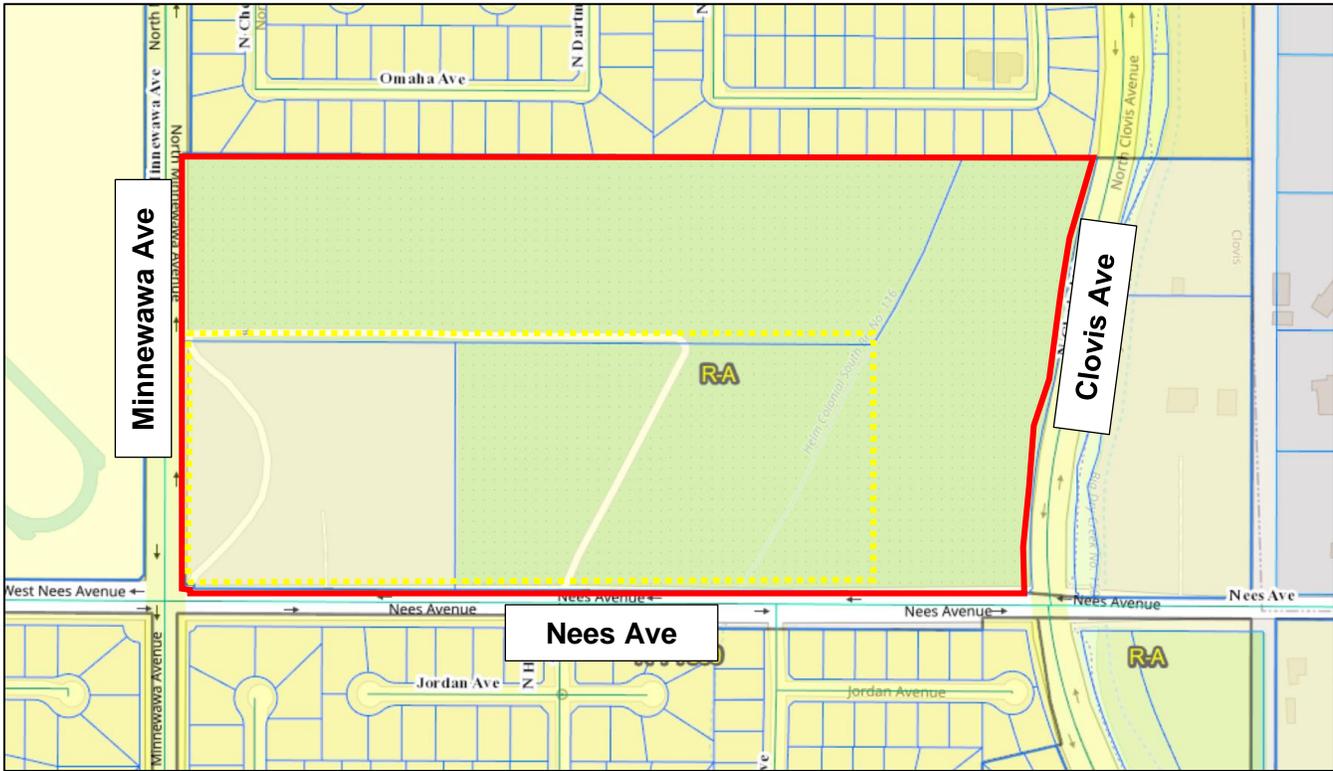
Figure 2: General Plan Land Use Designations



-  = Total Project Area (±53 acres)
-  = Limits of Proposed Project (±23 acres)



Figure 3: Zone District



-  = Total Project Area (± 53 acres)
-  = Limits of Proposed Project (± 23 acres)



Figure 5: Conceptual Elevation “Building A”

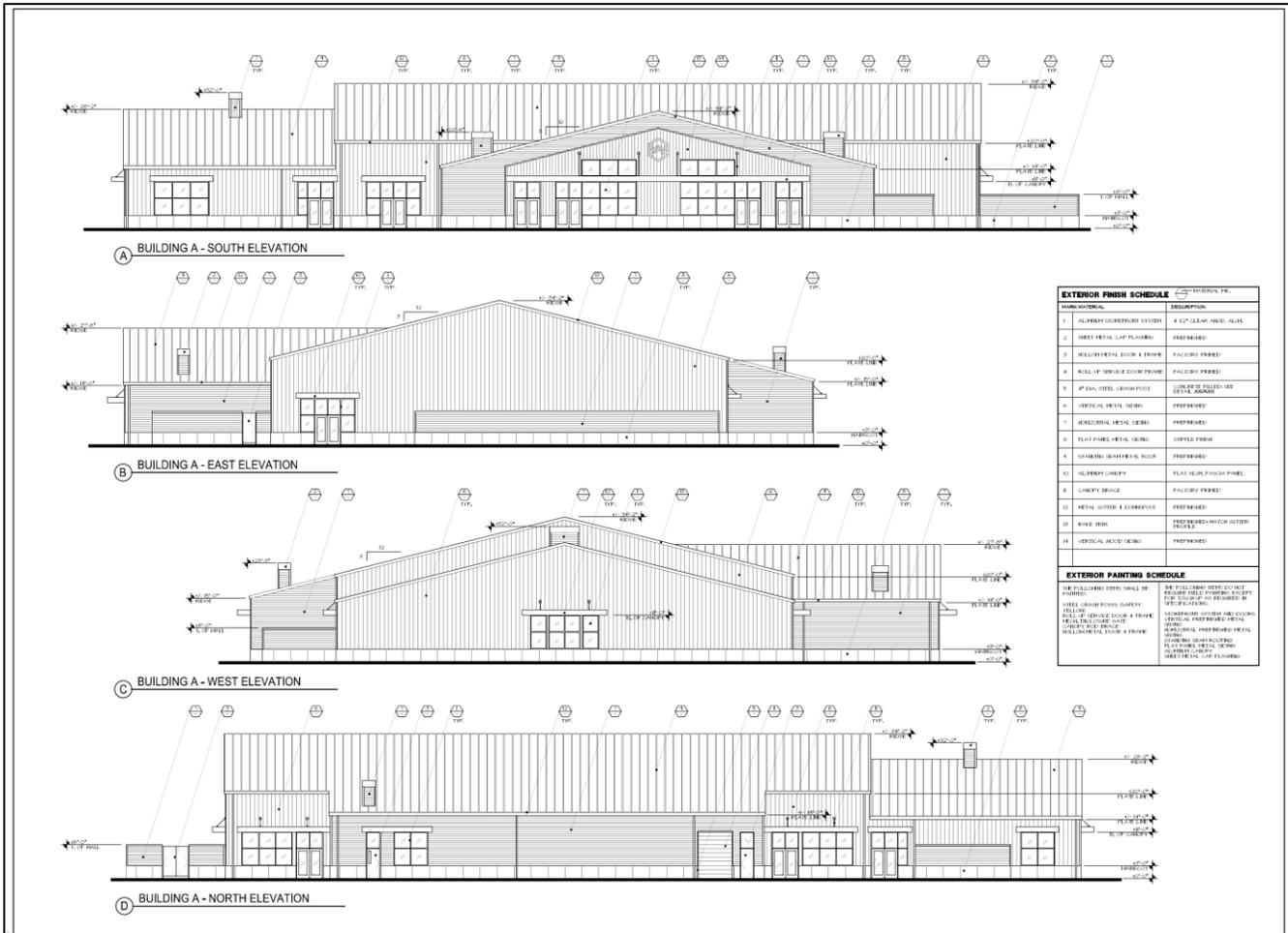
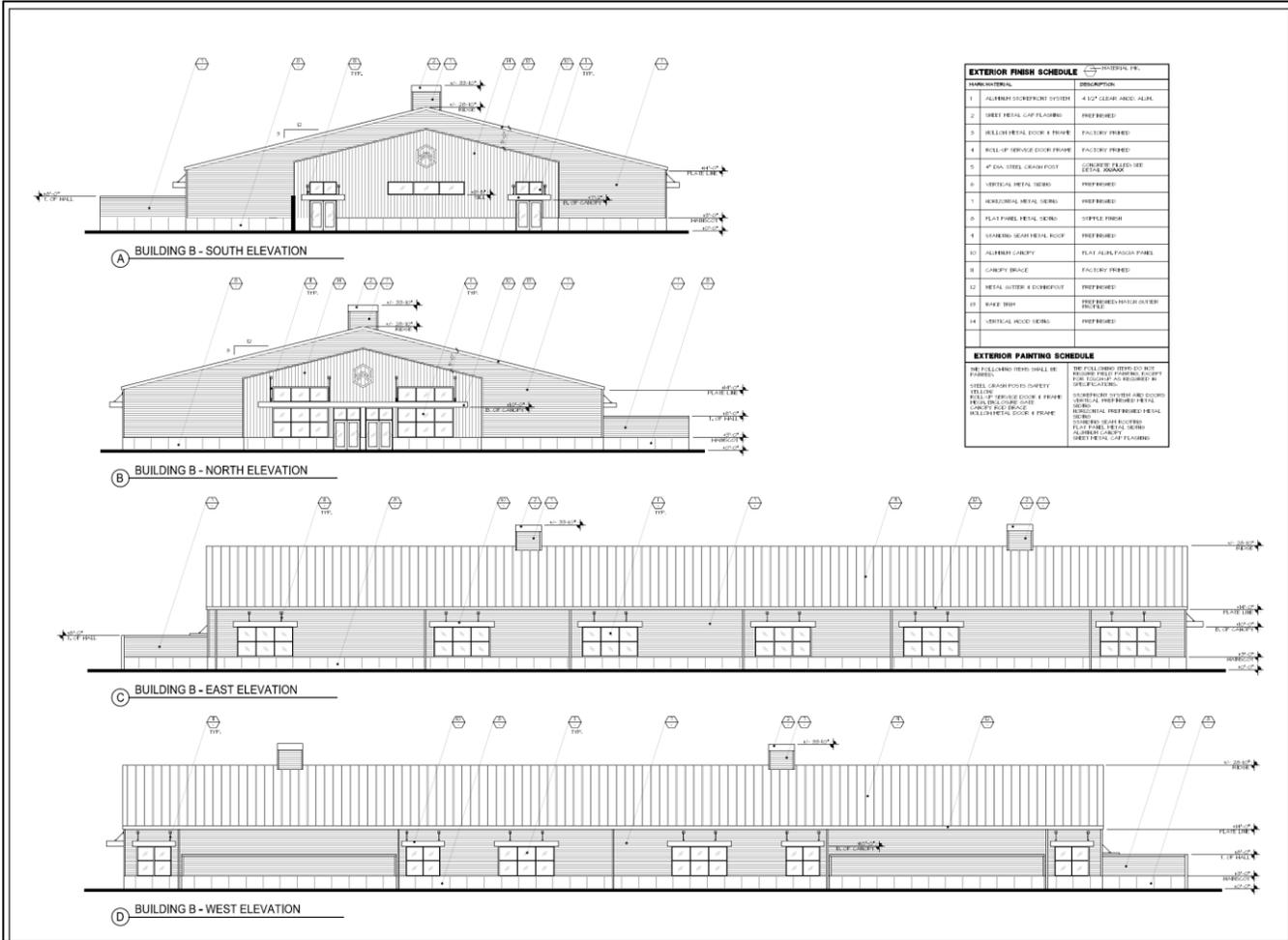


Figure 6: Conceptual Elevation “Building B”



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 on the north side of Nees Avenue between Minnewawa and Clovis Avenues. In general, the Project site is within an urbanized area of the City surrounded by existing residential to the north, east, and south, as well as Buchanan High School west of the site. The Dry Creek Preserve is located east of the Project site, bounded by Nees Avenue on the south and the Enterprise and Dry Creek Canals on the north, east, and west. The Preserve area comprises a mix of uses including orchards, pastureland, or other agricultural uses in addition to single-family residences. As a result, the area is characterized by a mix of development types and uses, as well as typical infrastructure, such as roadways, streetlights, parking lot lights, and ambient light sources typical of residential development.

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 be consistent with the R-1-7500 zone district standards which allows structures to be constructed at a maximum height of 35 feet. Although the maximum height limit is 35 feet/2-1/2 stories for R-1-7500 zone district, the Project proposes a maximum height of approximately 34 feet, which is below what is allowed under the development standards. Lastly, General Plan Policy 2.3 requires that public views of open spaces, parks, and natural features be maintained; however, the Project site is not within the immediate vicinity of these features. Therefore, because the Project would be constructed at a maximum height consistent with the R-1-7500 Zone District development standards, a **less-than-significant impact** would occur with regards to the Project having a substantial effect on a scenic vista. As a result, 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.¹ 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 primarily residential and educational uses. Thus, the area is generally characterized by different types of structures at varying heights, design, and character. The Project proposes to utilize a combination of existing site features, such as the existing home and landscaped grounds, as well as construct three (3) new structures, associated landscaping, utility and pedestrian infrastructure, and sports fields. Such uses would not substantially degrade from the existing visual character or quality of public views of the site and its surroundings. Further, as mentioned above, there are no officially designated scenic areas in the City, and none specifically at or surrounding the site itself.

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

In addition, the Project proposes that the structures would be at a height below the maximum height limit permitted under the proposed R-1-7500 zone district. Thus, the Project is within the scale and character of the area and would not substantially degrade the existing visual character. Lastly, the Project would undergo Site Plan Review (SPR) which would ensure that the overall design and character is consistent and/or complements the surrounding areas. The SPR process will ensure the Project complies with relevant design policies, such as General Plan, and the Clovis Development Code. 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 With Mitigation. The Project consists of a church with associated landscaping, utility and pedestrian infrastructure, and sports fields. The proposed Project would introduce new sources of light and glare, although there are current uses on the site that already produce light and glare. Light and glare from the Project would be typical of a church type development, which may include sources such as exterior lighting for safety, and light and glare from vehicles reflecting from surfaces such as windshields. Other sources of light would be the interior lighting of the buildings 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 uses, such as residential and educational, which as a result has established existing sources of light and glare. These sources of existing light and glare are comprised of streetlights, exterior and interior light and glare from existing homes, and from vehicles going to and from the neighborhood. Other sources of existing light and glare derive from vehicles travelling along Nees and Clovis Avenues.

Although the Project would introduce new sources of light and glare, the SPR process would ensure that the design and placement of lighting is appropriate to minimize potential light and glare impacts to surrounding properties. In addition, compliance with Mitigation Measure AES-1 would ensure that light and glare impacts be **less than significant with mitigation**.

Mitigation Measure AES-1: The Project shall 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.

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 along Nees Avenue with portions along Minnewawa Avenue and is considered an in-fill property. The site is within an urbanized area of the City and is surrounded a mix of existing developments types.

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,² the Project site is considered Farmland of Statewide Importance and Prime Farmland. Farmland of Statewide Importance is defined by the Department of Conservation as irrigated land similar to Prime Farmland that has a good combination of physical and chemical characteristics for the production of agricultural lands. Prime Farmland is defined by the Department of Conservation as irrigated land that has a good combination of physical and chemical features able to sustain long-term production of agricultural crops. As proposed, the Project would remove approximately 14 acres of peach tree crops on land designated as Farmland of Statewide Importance and Prime Farmland, thereby converting farmland within the Clovis Planning Area to non-agricultural uses. The conversion of farmland to non-agricultural uses was examined in the 2014 Clovis General Plan EIR. Pursuant to Section 15168(d) of the CEQA Guidelines, the 2014 City of Clovis General Plan EIR is incorporated by reference into this document. The 2014 Clovis General Plan Program EIR determined the impact of the conversion of farmland to non-agricultural uses to be significant and unavoidable and issued a Statement of Overriding Considerations within the area of Agricultural Resources. To mitigate the conversion of farmland to non-agricultural uses, EIR

² Farmland Mapping and Monitoring Program, California Department of Conservation, 2016 Fresno County Map.

Mitigation Measure 2-1 requires project applicants for properties that include 20 acres of more designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to prepare or fund an agricultural resource evaluation prior to project approval. This mitigation measure does not apply to the Project because the impacted agricultural land designated Prime Farmland and Farmland of Statewide Importance is less than 20 acres. On this basis, the Project would have a **less-than-significant** impact with regards to this topic. No mitigation measures are required.

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. Further, the site is not currently zoned or designated for agricultural use. As a result, the Project would have **no impact** 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 does not contain forest land. Further, the site is not zoned 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 Statewide Importance and Prime Farmland according to the Department of Conservation, the site is not zoned for or designated for agricultural uses. Further, the site is considered an in-fill site and the 2014 Clovis General Plan designates the site for uses other than farming. 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 under an applicable federal or state ambient air quality standard?			X	

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 December 4, 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).

Topography

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.

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 3, 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 (PM2.5), 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 based on 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 24-Hour	-- 150 ug/m ³	20 ug/m ³ 50 ug/m ³
PM _{2.5}	Annual 24-Hour	12 ug/m ³ 35 ug/m ³	12 ug/m ³ --
Lead	30-Day Avg. 3-Month Avg.	-- 1.5 ug/m ³	1.5 ug/m ³ --
Notes: ppm = parts per million; ug/m ³ = 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 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 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 SJVAPCD’s significance thresholds. The District’s annual emission significance thresholds are as follows:

- 100 tons per year CO
- 10 tons per year NO_x
- 10 tons per year ROG
- 27 tons per year So_x
- 15 tons per year PM₁₀
- 15 tons per year PM_{2.5}

Based on the AQ/GHG Report, the Project would not exceed these thresholds from construction and operation of the Project (As Shown in Table 4).³ Further, any impacts related to the construction activities of the Project, such as dust control, would be regulated through the SJVAPCD, which require measures such as frequent watering of the site during construction to minimize dust.

³ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, starting on page 75, December 4, 2020.

Table 4: CO, NO_x, ROG, PM₁₀, PM_{2.5} Thresholds, Maximum

Emission Source (Tons Per Year)	CO	NO_x	ROG	PM₁₀	PM_{2.5}
Highest Construction Emissions in Any Year (Unmitigated)	2.80	3.60	0.60	0.53	0.24
Operational Emissions at Buildout	2.25	0.79	0.67	0.61	0.17
Total Emissions	5.05	4.39	1.27	1.14	0.41
Significance Threshold	100	10	10	15	15
Exceed threshold – significant impact?	No	No	No	No	No
Notes: ROG = reactive organic gases NO _x = nitrogen oxides PM ₁₀ and PM _{2.5} = particulate matter					

Lastly, the SJVAPCD provided a comment letter, dated January 19, 2021, indicating that the Project would be subject to compliance with the SJVAPCD Rule 9510 (Indirect Source Review), which is intended to mitigate a project’s impact on air quality through project design elements or by payment of in-lieu fees and Regulation VII (Fugitive PM10 Prohibitions), which requires a Construction Notification Form or approval of a Dust Control Plan prior to construction.

Consequently, compliance with SJVAPCD regulations would ensure that the Project result in a **less-than-significant** impact and no mitigation measures are required.

- 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 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, south, and east, in addition to Buchanan High School to the west. Based the AQ/GHG Report, the Project would not exceed emission thresholds that would result in a significant impact⁴ 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 would include a church campus, thus, is unlikely to produce odors that would be considered to adversely affect a substantial number of people. Further, there are no major odor-generating sources within screening distance of the site. Although some odors would be emitted through the construction of the Project, such as diesel fuel and exhaust from construction equipment, these odors would

⁴ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, starting on page 89, December 4, 2020.

be temporary in nature and last only during construction activities. Further, the types of uses allowed in the R-1-7500 zone district such as a church development are not generally considered to be odor-causing uses that would adversely affect a substantial number of people. Overall, a **less-than-significant** impact would occur.

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
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ENVIRONMENTAL SETTING

A biological resources evaluation (Biological Resources Evaluation) was prepared by QK, Inc. dated December 2020 (see Appendix B). This Biological Resources Evaluation included a site survey for the presence and potential for special-status biological resources of the site. The site has been farmed and used for commercial activities, currently consisting of maintained peach orchards, the Peach Tree Fruit Stand, a processing and packaging facility for Wawona Frozen Foods, parking areas, tennis courts, merry-go-round, and temporary stage area.

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 Resources Evaluation, the site is partially developed and is surrounded by substantial development.⁵ The site comprises agricultural and ornamental plants with some ruderal plant species scattered throughout; no natural plant communities occur in the area of the Project site.⁶ Further, the Biological Resources Evaluation described the Project site as being very degraded from historical land uses, being mostly developed and with frequent disturbances from agricultural operations and urban landscaping maintenance. No special-status wildlife species or diagnostic signs of special-status wildlife species were present on the Project site, and, according to the Biological Resources Evaluation, the disturbed condition of the site would tend to preclude those species from occurring. Although no impacts to special-status species are expected, the Biological Resources Evaluation concludes that there is a potential for the project to impact migratory birds, raptors, and waters based on observations of inactive nests on existing structures and trees, an observed flyover of two (2) raptors, and presence of the Helm Colonial Ditch. In efforts to ensure protection of such species and waters, implementation of mitigation measures BIO-1, BIO-2, and BIO-3 would ensure that a **less-than-significant impact with mitigation** occurs.

Mitigation Measure BIO-1: Qualified Biological Monitor On-Site During Vegetation Removal. A qualified biological monitor should be on-site during vegetation removal within the Project footprint.

Mitigation Measure BIO-2: Pre-Activity Surveys for Birds During Nesting Season. For construction activities during February 15 through August 31, the applicant shall hire a qualified ornithologist to conduct pre-construction surveys for the presence of nesting birds at the Project site. The survey shall be conducted no more than seven (7) days prior to construction activities. The survey shall inspect all potential nesting areas for the presence of nests in or immediately adjacent to the impact areas. If an active nest is found, the applicant shall implement measures recommended by the ornithologist, which

⁵ Biological Resources Evaluation prepared by OK, Inc., December 2020, page 2.
⁶ Biological Resources Evaluation prepared by OK, Inc., December 2020, page 16.

could include establishing a construction-free buffer zone around the nest (typically 250 feet for raptors and 50 – 100 feet for other species).

Mitigation Measure BIO-3: Wetland Delineation. To minimize impacts to Helm Colonial Ditch, a wetland delineation analysis shall be conducted prior to undergrounding and the start of construction to determine the status of the ditch. Based on the analysis findings, coordination with the appropriate agencies should be conducted.

- 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 by agricultural and ornamental plants with some ruderal plant species scattered throughout. There are no riparian habitats or sensitive natural communities identified at the site, nor are there any identified in local or regional plans. 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 With Mitigation. Based on the Biological Resources Evaluation prepared for the Project, no wetland features are known to exist at the Project site. One water feature named Helm Colonial Ditch occurs on the site, flowing through the eastern section of the Project, running parallel to North Clovis Avenue, adjacent to peach orchards and a vacant lot, then branches off south of the Project site. The National Hydrography Dataset (NHD) identifies Helm Colonial Ditch as a canal and the National Wetlands Inventory (NWI) identifies it as a R5UBFx, an unknown perennial riverine system with an unconsolidated bottom that is semi-permanently flooded and that has been excavated by humans, however, it is not classified as a state or federally protected wetland. While the ditch will be undergrounded prior to the start of construction activities, implementation of mitigation measure BIO-3 would ensure that a **less-than-significant impact with mitigation** occurs.

- 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?*

No Impact. The Biological Resources Evaluation did not identify the site as a regional or local wildlife movement corridors.⁷ Further, wildlife corridors typically serve as areas that wildlife traverse in order to migrate from one habitat to another and because the site is infill and surrounded by urban development, the site is unlikely to serve as any sort of wildlife corridor. Thus, **no impact** would occur, and no mitigation measures are required.

- 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. The Project 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 2014 General Plan calls for the protection of biological resources, the Biological Resources

⁷ Biological Resources Evaluation prepared by OK, Inc., December 2020, page 24.

Evaluation 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 any trees that may need to be removed during construction. Compliance with the tree protection standards of the Clovis Municipal Code would require the replacement of trees and/or payment of in-lieu fees. Consequently, due to the lack of any identified sensitive species, and because the Project would be required to comply with the tree protection ordinance, the impact would be **less-than-significant**, and no mitigation measures would be required.

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.

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 a predominately disturbed and partially developed site with an existing agriculture-based business and cultivated lands. The site contains maintained peach orchards, the Peach Tree Fruit Stand, a processing and packaging facility for Wawona Frozen Foods, parking areas, an existing home and landscaped grounds, tennis courts, merry-go-round, and temporary stage area, and is surrounded by existing residential development as well as Buchanan High School. A Cultural Resources Survey was prepared by QK dated November 30, 2020 (See Appendix C). The Cultural Resources Survey was based on information obtained at the Southern San Joaquin Valley Information Center, CSU Bakersfield, as well as review of other surveys conducted in the area. Based on the Cultural Resources Survey, no cultural resources have been identified within one-half mile of the Project Site.

DISCUSSION

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

Less-Than-Significant Impact With Mitigation. As previously mentioned, the Project site is partially developed with an existing agriculture-based business and cultivated lands, containing peach orchards, a fruit stand, processing and packaging facility for Wawona Frozen Foods, parking areas, an existing home and landscaped grounds, tennis courts, merry-go-round, and temporary stage area, all of which are not identified as historical resources in the Cultural Resources Survey. A cultural resource records search was conducted within one-half mile of the Project. The search indicated that the subject property had never been surveyed for resources and it is not known if any exist on it. However, the Cultural Resources Survey concluded that based on the results of the records search findings and lack of archeological resources previously identified within a one-half mile radius of the Project, the potential to encounter subsurface cultural resources is minimal.⁸ 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. 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, regarding the Project causing a substantial adverse change in the significance of a historical resource 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.

⁸ Cultural Resources Technical Memorandum by OK, Inc., November 30, 2020, page 2.

- 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 partially developed with an existing agriculture-based business, cultivated lands, and an existing home with landscaped grounds, and is surrounded by existing urban development.⁹ The site's ground has been previously disturbed as a result of the agriculture, commercial, and residential uses and other ground disturbing activities throughout the years. 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**.

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

Less-Than-Significant Impact With Mitigation. The site is partially developed with an existing agriculture-based business, cultivated lands, and an existing home with landscaped grounds, and is surrounded by existing urban developed. The site's ground has been previously disturbed as a result of the agriculture, commercial, and residential uses and other ground disturbing activities throughout the years. 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.

⁹ Cultural Resources Technical Memorandum by OK, Inc., November 30, 2020, page 2.

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 is located on an infill site surrounded by existing urban uses, primarily residential and educational.

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 a church with associated landscaping, utility and pedestrian infrastructure, and sports fields. Construction of such structures would require site preparation, grading, paving, architectural coating, and trenching. Construction would consist of typical activities for construction projects and therefore would not require use of new resources. While such activities would consume petroleum-based fuels, such consumption would be temporary and conclude upon completion of construction. The proposed Project in operation would be served by Pacific Gas & Electric (PG&E) and would not require extensions of energy infrastructure or new energy supplies. As previously mentioned, the Project is located on an infill site surrounded by existing urban uses. Sources of operational energy consumption would include natural gas and/or electricity for space and water heating and transportation fuels (i.e., gasoline and diesel) for vehicle trips. As a church use, the church would typically operate during non-peak hours (i.e., in the morning). Further, the church use would be subject to compliance with the latest energy efficiency standards in effect at the time of development and operation. This would include compliance with Title 24 Green Building Standards for energy efficiency, as well as be required to comply with the latest water efficient landscape policy regulations. Further, the Project would be required to comply with Clovis General Plan Policy 3.4, and 3.7 of the Open Space and Conservation, which call for the use of water conserving and drought tolerant landscape, as well as energy efficient buildings. Conformance to these standards would be reviewed during the City’s site plan review process and during review of building plans.

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, subsidence, liquefaction or collapse?			X	
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.¹⁰ 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?*

Less-Than-Significant Impact. The topography of the Project site is relatively flat with little to no slope. Development of the site would require grading and construction activities to ensure a flat and graded surface prior to construction. Such activities may result in the soil erosion and loss of topsoil. Such impacts would be addressed by applicable regulations set forth by the Regional Water Quality Control Board (RWQCB) including preparation of a Stormwater Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer per the General Construction Permit requirements of the National Pollutant Discharge Elimination System (NPDES). The SWPPP incorporates Best Management Practices for erosion and sediment controls and soil stabilization. Further, 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, these review and approval processes 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

¹⁰ 2014 Clovis General Plan EIR, Chapter 5: Geology and Soils, page 5.6-3.

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 Survey 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	
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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 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 snowpack, 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.

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- 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.

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 an approximately 80,000 square foot church campus. 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 sufficiently 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.¹¹ In particular, the AQ/GHG Report found that the Project would achieve a reduction of 35.5% from BAU by 2024 and 42.4% by 2030 with regulations and design features incorporated. 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,¹² 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. Further, although the SJVAPCD has adopted a Climate Action Plan, it does not contain measures that are applicable to development projects. Since there are no other local or regional climate action plans, the Project was assessed for consistency with the Air Resources Board (ARBs) adopted scoping plans.

¹¹ Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, page 112, December 4, 2020

¹² Air Quality and Greenhouse Gas Analysis Report, Mitchell Air Quality Consulting, page 126, December 4, 2020

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	
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	
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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 to the Project site is Buchanan High School, located immediately adjacent to the Project site, to the west.

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 an approximately 80,000 square-foot church campus under the proposed R-1-7500 zone district, which allows a church use with approval of a conditional use permit. The type of hazardous materials that would be associated with the Project are those typical of churches, such as the use of cleaners, landscape maintenance products, soaps, and potential pesticides (for pest control). It is not expected that the Project would routinely transport, use, or dispose of hazardous materials other than those typical of those associated with church uses. However, if transported, handled, and disposes of in accordance with regulations, these materials 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/commercial 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 previously discussed, the Project site is near Buchanan High School. However, 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.¹³ 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 located approximately five (5) miles northeast of the Fresno Yosemite International Airport and is not within the Airport Influence Area, safety zones, noise, or airspace and overflight areas. 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 road network is already in place from previous development. 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 be 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 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

¹³ California Department of Toxic Substance Control, EnviroStor Database, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=71003467, accessed on February 22, 2021.

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 or otherwise substantially degrade surface or ground water quality?			X	
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 built out 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

In 2014, the Sustainable Groundwater Management Act (SGMA) was signed into law which created the framework for groundwater management within California. As a result, SGMA requires governments and water agencies of high and medium priority basins to halt groundwater overdraft and bring the groundwater basins back to a balance.

The City of Clovis is within the greater Kings Groundwater Sub basin, which is managed by the North Kings Groundwater Sustainability Agency for the area which the City is located and is considered critically over drafted. The Kings Basin is a sub basin to the southern part of the San Joaquin Valley Basin and covers 1,530 square miles. Groundwater within the basin is monitored by the City, Fresno Irrigation District (FID), and the Kings River Conservation District.

The City of Clovis provides water through a combination of surface and groundwater sources, including averaging over 20,000 acre-feet per year from the Kings River, as well as several City-managed wells. In 2015, the City delivered approximately 20,030 acre-feet of water to its residents.

Lastly, a Water Infrastructure Investigation was completed by Provost and Pritchard on January 20, 2021. The investigation was into the water system infrastructure required to serve the proposed development. Information from this investigation is used for the analysis in the Hydrology and Water Quality and Utilities and Service Systems sections of this Initial Study.

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 suburban development that the Project proposes. 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. In addition, other than landscaping, a church use is a low water use. All landscaping shall be subject to MWEL requirements, which mandate drought tolerant and low water use landscaping. Further, the Water Infrastructure Investigation for the Project determined that the existing and planned water distribution system and recommended connections should be adequate to convey water supply to the Project to support anticipated demands from the Project. For these reasons, 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 an infill site that is generally flat and surrounded by existing urban uses. There are no streams or rivers on the site that would be altered as a result of the Project. There is an existing canal that bisects the eastern portion of the site that shall be undergrounded. Further, some of the infrastructure surrounding the site, such as storm drains are already in place from existing development. The site is mostly pervious since it is partially undeveloped, and as a result, the Project would increase the amount of impervious surfaces by installing paving for parking lots, 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 storm drain system is maintained and so that no flooding occurs. FMCD has reviewed the Project and there are existing facilities to serve the site subject to compliance with conditions of approval that would be required as part of the Project entitlements. 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 an infill site substantially surrounded by existing urban uses. Due to the Central Valley's location away from the ocean, an impact from a tsunami is unlikely. However, the Project site is designated as a Federal Emergency Management Agency (FEMA) Flood Zone "X" which is considered by FEMA as a non-special flood hazard area and that the risk of a flood is low risk. A Flood Zone X has a 0.2 percent-annual-chance of flood (or a 500-year flood). Consequently, this is a low-risk area and as a 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. The North Kings County GSA adopted a groundwater management plan in 2019. Although the groundwater sub basin which Clovis lies within is considered over drafted, 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.

Further, the Water Infrastructure Investigation for the Project determined that the existing and planned water distribution system and recommended connections should be adequate to convey water supply to the Project to support anticipated demands from the Project. 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

As described above in the Project Description, the Project site is considered an in-fill site in that the surrounding areas are urbanized. There are existing single-family residential uses to the north, east, and south, as well as Buchanan High School to the west. The site has an existing residence located at the immediate northeast corner of Minnewawa and Nees Avenues. Although nobody currently lives at this location, the structure would be used for office type uses related to the administrative functions of the church. It is also anticipated that the residence and its landscaped grounds would serve as a site for weddings and other special events. The residence is not anticipated for use as full-time living quarters.

DISCUSSION

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

Less-Than-Significant Impact. The site is partially developed and is within a general area that is urbanized with a mix of existing uses and land use types. 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 as Low Density and Medium High Density Residential. Further, as part of the Project, new pedestrian infrastructure would be installed throughout the site including along Nees Avenue to facilitate improved and safer connections between the site and adjacent uses.

Consequently, the Project seeks to complement and enhance the connectivity of the area with installation of a new public sidewalks, and internal walkways that would improve circulation throughout this area. 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. The proposed use of the site as a church is consistent the low-density residential General Plan Land Use designated for this site given that churches are permitted in residential districts. The proposed rezone request to the R-1-7500 zone district will bring the project site into conformance with the existing low-density residential land use designated for the site by the General Plan. Further, through the entitlement process, the Project is reviewed for compliance with applicable regulations, including those intended for avoiding or mitigating 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. Overall, with 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.¹⁴ 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.

¹⁴ 2014 Clovis General Plan EIR, Chapter 5: Mineral Resources, page 5.11-1.

- 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

ENVIRONMENTAL SETTING

As mentioned above in the Project Description, the site is located on the north side of Nees Avenue between Minnewawa and Clovis Avenues. In general, the Project site is within an urbanized area of the City surrounded by existing residential to the north, east, and south, as well as Buchanan High School west of the site. As such, existing ambient noise levels are typical of noises from these types of developments (i.e., schools, roadway networks, and residential).

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 a partially developed site within Clovis. Thus, the Project would result in a temporary and permanent increase in ambient noise levels as a result. However, as mentioned above, the Project site is infill and is already surrounded by existing residential development and educational uses. Therefore, while the Project would introduce new ambient noise from the construction of and operation of the church campus, it is likely that the Project would still meet City noise standards.

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.

During operation of the Project, typical noises would include those of vehicles driving at slow speeds to and from their destination, as well as noises such as car doors shutting, and other noises typical of churches. Church activities and other events typically associated with church functions would be subject to CMC standards and regulations based on the type of event (i.e., fundraising, after school programs, trainings, weddings, funeral services, etc.). Section 9.22.080 establishes noise standards that would need to be adhered to in order to ensure that significant noise disturbance does not occur to neighboring properties.

Consequently, because the Project site is considered infill, 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 a church campus on a partially developed site. Construction equipment typical of the development of church buildings would be utilized temporarily. This equipment could include the use of heavy tractors, trucks, and other equipment; however, this type of equipment isn't typically associated with excessive groundborne vibration given the distance of residential homes to the site. 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 that temporary construction vibration and noise is exempt from these provisions since 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 Fresno Yosemite International Airport, which is approximately five (5) miles southwest of the site. As such, it is located outside of the noise contour map of the airport.¹⁵ Therefore, people working at the church would not be exposed to excessive noise levels and **no impact** would occur.

¹⁵ Fresno Council of Governments, Airport Land Use Compatibility Plan, December 2018, Fresno Yosemite International Airport, Exhibit D2, Noise Contours.

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 an in-fill site that has previously been planned for residential use in the 2014 Clovis General Plan. As previously mentioned, a rezone application has been filed to rezone the site to the R-1-7500 zone district to bring the zoning in conformance with the General Plan Land Use Designation. The R-1-7500 zone district is consistent with the Low Density Land Use and also permits a church subject to a CUP.

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 include construction of a church in an area planned for residential uses. Therefore, the site was planned for population growth within this area. While the Project includes decreasing the amount of land for residential uses, the overall area was planned for development and is considered an infill site. 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 is an in-fill site, thus, the primary infrastructure (i.e. road network, utilities, etc.) is already in place and would be able to serve the site, as planned for in 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?*

Less-Than-Significant Impact. The Project site is currently partially developed. While there is an existing home on the site, nobody currently lives at this location and the residence is not anticipated for use as full-time living quarters. Rather, the structure would be used for office type uses related to the administrative functions of the church. Therefore, the Project would not result in the substantial displacement of existing people or housing. Therefore, displacement of existing people or housing would not occur, and a **less-than-significant** impact would occur.

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 on an in-fill site within the City, surrounded by existing residential and educational uses. As mentioned above in the Population and Housing and Land Use and Planning sections, the Project is generally consistent with the use already planned for in terms of type, and intensity of 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 #3, located approximately one (1) mile south of the site. The Clovis Police department is located approximately two (2) miles south 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 new uses to the area, the site is in an urbanized area of the City already able to be served by the Clovis Fire Department. Also, the site itself is near Fire Station's #3, which would mean that response times should be able to be maintained during calls for service. As part of the entitlement process for the Project, the Clovis Fire Department reviewed the design and site layout to ensure adequate fire safety measures and site circulation are achieved. This review includes 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. The initial review by Fire Department determined that adequate fire services can be provided to the site subject to standard conditions of approval, including providing minimum clear paths of travel for fire access. Overall, 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 new uses to the area, the site is in an urbanized area of the City already able to be served by the Clovis Police Department. The Clovis Police Department headquarters are located at 1233 Fifth Street, which is approximately two (2) 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 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?*

No Impact. The Project includes construction of a church which would not generate students for schools. Therefore, because the Project would not result in an increase in population, the Project would have **no impact** on schools 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 new uses, the Project's consistency with the planned land use designation for this site would mean that the potential impacts on public facilities have been adequately accounted for. The Project would not generate population given that there is no residential component to the Project, thus, would not necessarily result in the increased usage of other public facilities. 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. As such, payment of the typical development fees, 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
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?			X	
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?			X	

ENVIRONMENTAL SETTING

The Project is located on an in-fill site surrounded by existing residential and educational uses. The nearest park to the site is Cambridge Colony Park, located south of Nees Avenue to the south of the site, and the nearest recreational trail is the Dry Creek Trail, which is located east of the Project 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 proposes the construction of a church which would not generate new residents to the site. Although the Project would not include the construction of homes, it's possible that workers or patrons of the site could utilize the nearby park, although this is not likely to substantially increase the usage of the park. Further, the Project itself would include landscaped areas along the Project frontages which could be utilized by workers or patrons of the site. Overall, the type and use of Project would not likely 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 landscaping in compliance with City standards for commercial development. However, 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 Project is within a previously urbanized area in the City, as previously mentioned. The site is bounded by Minnewawa Avenue to the west, Nees Avenue to the south, and Clovis Avenue to the east. According to the 2014 Clovis General Plan Circulation Diagram in the Circulation Element (Figure C-1 of the Circulation Element), Minnewawa, Nees, and Clovis Avenues are designated as arterial streets. Arterial streets are intended to move large volumes of traffic and are intended to provide a high level of mobility between freeways, expressways, other arterials, and collector roadways. A Traffic Impact Study (TIS) was prepared by Peters Engineering Group on March 1, 2021 (included as Appendix D of this Initial Study). The information and analysis in the following section is based 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. The Clovis General Plan requires a minimum Level of Service (LOS) D at intersections under the City’s jurisdiction. The City of Clovis *Interim Transportation Impact Analysis Guidelines* (Guidelines) dated July 14, 2020 state the following: “All City intersections and roadway segments shall operate at a LOS D or better under the near-term conditions, unless a finding of overriding consideration was adopted in the General Plan EIR. Under long-term conditions, all City intersections and roadway segments shall operate at a LOS D or better, except for the roadway segments adopted in the General Plan EIR to operate at LOS E or F.” Although the State of California does not recognize traffic congestion and delay as an environmental impact per CEQA, the TIS prepared for the Project utilized the LOS D threshold as its criteria of significance for consistency with the Clovis General Plan policy related to maintaining acceptable LOS.

The study scenarios analyzed by the TIS include: Existing Traffic Conditions, Existing Plus-Project Conditions, Near-Term-with-Project Conditions, and Cumulative 2040 With-Project Conditions. The results of the analyses indicate that the study intersections will continue to operate at acceptable levels of service with queuing conditions (See Mitigation Measures TRAF 1-4 below) generally similar to the existing conditions, after construction of the Project. After church services, project trips exiting the site at the East Site Access driveway on Nees Avenue and turning left to eastbound Nees Avenue are expected to experience LOS F. However, this will be mitigated by the condition that left turns out of the Project site be temporarily prevented after large events on weekends. This can be accomplished with installation of traffic cones and similar temporary traffic control devices along with a right-turn-only sign (See Mitigation Measure TRAF-5 below).

Lastly, the cumulative year 2040 analyses suggest that, as regional growth continues, delays experienced by vehicles making the northbound-to-westbound left turn from DeWitt Avenue to Nees Avenue will experience periods of LOS F. According to the TIS, this condition is likely to occur whether or not the church is constructed. Overall, with implementation of Mitigation Measures TRAF-1 to TRAF-5, a **less-than-significant with mitigation** would occur.

Mitigation Measure TRAF-1: West Site Access / Nees Avenue / Harvard Avenue: One dedicated right-turn lane exiting the site is recommended and two lanes entering the site are proposed. Per City requirements, construct a median worm to prevent left turns out of the driveway and left turns out from Harvard Avenue. The existing left-turn lanes on Nees Avenue will remain. The proposed dedicated right-turn lane from westbound Nees Avenue turning into the site is recommended to be at least 125 feet long. To improve the efficiency and safety of the two entering lanes, it is recommended that an island be constructed to provide a physical barrier separating vehicles turning left into the site from vehicles simultaneously turning right into the site from the opposite direction. A similar existing configuration can be observed at the Herndon Avenue entrance to the Trading Post Shopping Center at the southeast corner of Herndon and Clovis Avenues.

Mitigation Measure TRAF-2: East Site Access / Nees Avenue / DeWitt Avenue: The intersection will remain as a full-access opening. One shared left-turn/through lane and one dedicated right-turn lane exiting the site are recommended, along with two proposed lanes entering the site. The proposed dedicated left-turn lane to be constructed in the existing Nees Avenue median for the eastbound-to-northbound left-turn movement into the site is recommended to be on the order of 150 feet long and should be maximized within the existing space available. The existing westbound left-turn lane (which turns left to southbound Harvard Avenue) to the west of the proposed lane should not be reduced in length. The proposed bay taper may be reduced below 120 feet, if necessary, to provide the recommended 150 feet of storage. The proposed dedicated right-turn lane from westbound Nees Avenue turning into the site is recommended to be at least 125 feet long. To improve the efficiency and safety of the two entering lanes, it is recommended that an island be constructed to provide a physical barrier separating vehicles turning left into the site from vehicles simultaneously turning right into the site from the opposite direction. A similar existing configuration can be observed at the Herndon Avenue entrance to the Trading Post Shopping Center at the southeast corner of Herndon and Clovis Avenues.

Mitigation Measure TRAF-3: Minnewawa Avenue / Site Access: The existing full-access opening that currently serves as the driveway to the Wawona Packing Shed and Peach Tree Fruit Stand is recommended to remain in its existing condition, with the exception that striping to delineate separate left-turn and right-turn lanes exiting the site are recommended.

Mitigation Measure TRAF-4: Clovis Avenue / Site Access: The new right-in/right-out driveway is recommended to have one lane entering the site and one lane exiting the site. The proposed dedicated right-turn lane from southbound Clovis Avenue turning into the site is recommended to be 100 feet long.

Mitigation Measure TRAF-5: Left turns out of the Project site shall be temporarily prevented after large events on weekends. This can be accomplished with installation of traffic cones and similar temporary traffic control devices along with a right-turn-only

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), traffic impacts are related to Vehicle Miles Traveled (VMT). The VMT metric became mandatory on July 1, 2020. The City Guidelines provide guidance relative to analyzing VMT for purposes of determining transportation impacts in accordance with CEQA. The City Guidelines indicate that "...religious institutions...may be evaluated using the net VMT criteria similar to retail projects. The City Guidelines also state that Projects that generate or attract fewer than 500 vehicle trips per day are presumed to cause a less-than-significant transportation impact.

Per the City Guidelines, the proposed Project would be treated as a retail project in terms of VMT. By adding church opportunities into the urban fabric and thereby improving church destination proximity, local-serving church development can be assumed to shorten trips and reduce VMT in the same way as local-serving retail. On this basis, it is recommended that the Project be presumed to cause a less-than-significant impact.

The weekday church trips, however, tend to be weighted toward an employee-based use and may not fall into the category of local-serving as described above. The TIS analysis indicates that the Project is likely to generate 556 trips on weekdays, which will be four days per week because the church will be closed on Fridays and Saturdays.¹⁶ Therefore, the average daily number of trips generated by the employee-based operations can be calculated as $(4 * 556) / 6 = 371$ trips per day. Since the weekday Project trips weighted toward an employee-based use is fewer than 500 trips per day, the Project may be presumed to cause a **less-than-significant** VMT impact.

Further, the State of California Governor's Office of Planning and Research *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) dated December 2018, states, "Of land use projects, residential, office, and retail projects tend to have the greatest influence on VMT." The Technical Advisory also states, "By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. By adding church opportunities into the urban fabric and thereby improving church destination proximity, local-serving church development can be assumed to shorten trips and reduce VMT in the same way as local-serving retail. On this basis, the Project would cause a **less-than-significant** VMT 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. Nees Avenue and Minnewawa Avenue) was previously constructed to City roadway standards. Therefore, because the Project would undergo

¹⁶ Traffic Impact Study, Peters Engineering Group, January 29, 2021, page 6.

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 three ingress/egress access points, including one along Clovis Avenue and two along Nees 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
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?		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 November 9, 2020, consistent with AB52, invitations to consult on the Project were mailed to 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 consultation were requested during that time. A Cultural Resources

Survey was prepared by QK dated November 30, 2020 (See Appendix C). The Cultural Resources Memo was based on information obtained at the Southern San Joaquin Valley Information Center, CSU Bakersfield, as well as review of other surveys conducted in the area. Based on the Cultural Resources Survey, no cultural resources have been identified within a half mile of the Project site.

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 partially developed. 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 partially developed but would require trenching and ground-disturbing activities during construction for the installation of utility infrastructure needed to serve the Project. Although no cultural resources were identified at the site, 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 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.

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 a church on an infill site. As mentioned above, the site is consistent with the General Plan land use designation previously accounted for in the 2014 Clovis General Plan. As part of the review process for the Project, the 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. FMCD has reviewed the Project and there are existing facilities to serve the site subject to mitigation. Further, while the Project would introduce new uses at this site, the type of development is consistent with the land use designation previously planned for. 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 uses which are served adequately with City water. Therefore, the Project is anticipated to be adequately served by City water. 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. Lastly, a Water Infrastructure Investigation was completed by Provost and Pritchard on January 20, 2021, which determined that the existing and planned water distribution system and recommended connections should be adequate to convey water supply to the Project to support anticipated demands from the Project. As such, the Project would not negatively impact the City's ability to provide a supply and delivery of water for foreseeable future development. 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. Further, a Wastewater Service Study was conducted by Blair, Church, and Flynn on January 22, 2021, which determined that the existing and planned wastewater collection system facilities can accommodate the type of use proposed. 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 Impact. 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 employee disposal rate of 15.5 pounds per day per employee, meaning that Clovis residents are actually producing less solid waste than the target set by the State.¹⁷ 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 temporary or ongoing impacts to the environment?			X	

¹⁷ Calrecycle, City of Clovis, <https://www2.calrecycle.ca.gov/LGCentral/DiversionProgram/JurisdictionDiversionPost2006>, accessed February 22, 2021.

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	
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ENVIRONMENTAL SETTING

The Project site is located on an infill site surrounded by existing urban uses. The site’s topography is relatively flat with level terrain and is characterized primarily by the existing peach orchard.

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 relatively flat with level terrain and is surrounded by existing development. Further, the road network is already in place from previous development. 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 be 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.

- 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 relatively flat with level terrain, is partially developed, and is located on an infill site surrounded by existing urban 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. 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 structures 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 uses. As a new development, installation of a private roadway network, water lines, and power lines would be required; however, these utilities and infrastructure are typical of 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 of residential and educational 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. While air quality that is generally considered to be cumulatively measured, 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 new uses to an existing partially developed site, the type of use was previously accounted for in the 2014 Clovis General Plan buildout. Therefore, cumulative impacts were already accounted for since the Project is generally consistent with the proposed Zone District, bringing the Project site into compliance with the General Plan Land Use Designation. 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

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TECHNICAL STUDIES

Air Quality and Greenhouse Gas Analysis Report

Clovis-Dakota Business Park
Dave Mitchell, Senior Air Quality Scientist
Mitchell Air Quality Consulting

Biological Resources Evaluation

New Church Campus Project
Curtis Uptain, Principal Biologist
QK, Inc.

Cultural Resources Technical Memorandum

Well Community Church Campus Construction
Robert Parr, Senior Archeologist
QK, Inc.

Traffic Impact Study

Proposed Church
Peters Engineering Group
John Rowland, PE, TE