APPENDIX A

NOTICE OF PREPARATION AND INITIAL STUDY

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NOTICE OF PREPARATION
OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE TRACT MAP 6343 PROJECT

Date: December 19, 2022

To: Office of Planning and Research, Responsible and Trustee Agencies, Other Public Agencies and Other Interested Parties

Subject: Notice of Preparation of Draft Environmental Impact Report for the Tract Map 6343 Project

Lead Agency: City of Clovis

Project Title: Tract Map 6343

Project Applicant: Wilson Premier Homes, Inc

Contact: Lily Cha, Senior Planner
Planning Division
1033 Fifth Street
Clovis, CA 93612
(559) 324-2335
lilyc@cityofclovis.com

Comment Period: December 19, 2022 to January 17, 2023

PURPOSE OF NOTICE

The City of Clovis (City) is the lead agency responsible for preparation of an Environmental Impact Report (EIR) for the Tract Map 6343 Project (proposed project). Pursuant to provisions of the California Environmental Quality Act (CEQA), the City has prepared this Notice of Preparation (NOP) for the proposed project. Once a decision is made to prepare an EIR, the lead agency must prepare a NOP to inform all responsible and trustee agencies that an EIR will be prepared (CEQA Guidelines Section 15082). The purpose of this NOP is to provide agencies, interested parties, and organizations with sufficient information describing the proposed project and its potential environmental effects to enable meaningful input related to the scope and content of information to be included in the EIR.

PUBLIC REVIEW PERIOD

As required by Section 15082 of the CEQA Guidelines, this NOP has been prepared and distributed to solicit comments from interested parties and potential responsible and trustee agencies and other public agencies so that project-related concerns relevant to each agency's statutory responsibilities in connection with the proposed project can be addressed in the EIR, as well as any related issues from interested parties other than potential responsible and trustee agencies, including other agencies and affected members of the public. The EIR will be the environmental document of reference for Responsible and Trustee Agencies when considering subsequent discretionary approvals.

This NOP is being circulated for public review and comment for a period of 30 days beginning December 19, 2022. The City requests that any potential responsible or trustee agencies responding to this NOP reply in a manner consistent with Section 15082(b) of the CEQA Guidelines, which requires submittal of any comments in response to this notice no later than 30 days after receipt of the NOP. Comments in response to this NOP will be accepted through 5:00 p.m., January 17, 2023.

Please send your written comments to Ms. Cha and include your name, address, phone number, and/or email address so that we may contact you for clarification, if necessary.

Copies of the Notice of Preparation may be reviewed at the following locations:

- Clovis Regional Library, 1155 5th Street, Clovis, during library hours;
- City of Clovis, Planning and Development Department, 1033 Fifth Street, Clovis, between 8:00 a.m. and 4:00 p.m.; or
- Online at: https://cityofclovis.com/planning-and-development/planning/ceqa/

PROJECT DESCRIPTION

The proposed project would consist of the annexation of 246 acres by the City of Clovis, and the development of 590 residential lots, averaging 3,329 square feet within the 71.54-acre project site. The proposed lots would be developed into single-family residences over time. Sixty-six outlot spaces that would potentially be developed into private roads, private parking, pedestrian walkways, landscaping, public utilities, and public park uses would also be included within the project site.

No development is proposed within the remaining 174.46-acre annexation area surrounding the project site. The proposed project would include annexation of the 246-acre area from Fresno County jurisdiction to the City of Clovis. Any future development occurring within the annexation area would require a separate project-specific analysis.

The proposed project would be developed in three phases.

- **Phase 1.** Phase 1 would include the development of 136 single-family residential units with an average size of 1,514 square feet per unit. Phase 1 would be located on the southern portion of the project site and would be accessed through one ingress and egress driveway located on Perrin Avenue. Phase 1 would include the construction of 44 parking spaces, an 8,745 square-foot community pool and recreation area, a 13,930 square-foot community park, 0.51 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along Perrin

Avenue. The southern extension of North Baron Avenue from East Behymer Avenue and the extension of Perrin and Hammel Avenue within the project site would be constructed during Phase 1.

- **Phase 2.** Phase 2 would include the development of 214 single-family residential units with an average size of 2,168 square feet per unit. Phase 2 would be located on the central portion of the project site and would be accessed through one gated ingress and egress driveway located along the future southern extension of Baron Avenue, and one driveway along Hammel Avenue. Phase 2 would include the construction of an approximately 26-foot-wide drainage channel along Perrin Avenue, approximately 0.35 acre of landscaped areas, as well as storm drainage and pedestrian infrastructure improvements along Perrin Avenue and Hammel Avenue.

- **Phase 3.** Phase 3 of the proposed project would include the development of 240 single-family residential units with an average size of 1,514 square feet per unit. Phase 3 would be located on the northern portion of the project site and would be accessed through two gated ingress and egress driveways located along the future southern extension of Baron Avenue, and through one gated driveway located along the future northern extension of Hammel Avenue. Phase 3 would include the construction of approximately 91 parking spaces, an approximately 9,985 square-foot pool and recreation area, approximately 0.65 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along Baron Avenue.

In addition, development of the project site would include infrastructure improvements for water services along the East Behymer Avenue frontage and Baron Avenue frontage, as well as stormwater management infrastructure improvements along the Perrin Avenue frontage. The proposed project would also construct a two-lane, approximately 49-foot-wide and 2,650-foot long extension of Baron Avenue south of East Behymer Avenue.

ALTERNATIVES TO BE ANALYZED IN THE EIR

In accordance with Section 15126.6 of the CEQA Guidelines, the EIR will assess a range of reasonable alternatives to the proposed project. The range of alternatives to be addressed will include alternatives that are specifically required by CEQA (e.g., the No Project Alternative), as well as other alternatives intended to reduce or eliminate potentially significant impacts, as identified through the coordinated consultation and planning process.

POTENTIAL ENVIRONMENTAL EFFECTS

The EIR will evaluate the potential environmental impacts of the proposed project, after having first established the environmental setting, or baseline, for the environmental analysis. The significance of potential impacts, cumulative impacts, and appropriate mitigation measures associated with the proposed project would be thoroughly discussed in the EIR.

The Initial Study prepared for this EIR evaluated the environmental issue topics required by CEQA. The individual environmental topics evaluated in the Initial Study include the following:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing

- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The Initial Study identified potentially significant environmental issue topics that will be analyzed in more detail in the EIR. The topics include:

- Air Quality
- Greenhouse Gas Emissions
- Noise
- Transportation

PUBLIC SCOPING MEETING

The City will hold a public scoping meeting to inform interested parties about the proposed project, and to provide agencies and the public with an opportunity to provide comments on the scope and content of the EIR. The meeting time and location is as follows:

City of Clovis Council Chamber
1033 Fifth Street
Clovis, CA 93612
Date: Thursday, January 12, 2023
Time: 6:00 p.m.

PUBLIC REVIEW DRAFT

TRACT MAP 6343
INITIAL STUDY

CLOVIS, CALIFORNIA

LSA

December 2022

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PUBLIC REVIEW DRAFT

TRACT MAP 6343
INITIAL STUDY

CLOVIS CALIFORNIA

Submitted to:

Lily Cha, Senior Planner
Planning and Development Services
1033 Fifth Street
Clovis, California 93612

Prepared by:

LSA
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Clovis, California 93611
(559) 490-1210

Project No. CIT2201

LSA

December 2022

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FIGURES AND TABLES

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LIST OF ABBREVIATIONS AND ACRONYMS

µg/m^3	micrograms per cubic meter
AB 52	Assembly Bill 52
Active Transportation Plan	2021 Clovis Active Transportation Plan Update
AF	acre-feet
AFY	acre-feet per year
AFY/ac	acre-feet per year per acre
Air Basin	San Joaquin Valley Air Basin
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor Parcel Numbers
BMPs	Best Management Practices
CAL FIRE	California Department of Forestry and Fire Protection
CalEPA	California Environmental Protection Agency
CALGreen Code	California Green Building Standards Code
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Clovis Fire Department
CH_4	methane
City	City of Clovis
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CPD	Clovis Police Department
CRA	Cultural Resource Assessment
CUSD	Clovis Unified School District
db	decibels
dBA	A-weighted decibels
DTSC	California Department of Toxic Substances Control

EIR	Environmental Impact Report
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FID	Fresno Irrigation District
FMFCD	Fresno Metropolitan Flood Control District
FMMP	Farmland Mapping and Monitoring Program
Fresno LAFCo	Fresno County Local Agency Formation Commission
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
gpm	gallons per minute
GWP	Global Warming Potential
HCP	Habitat Conservation Plan
HFCs	hydrofluorocarbons
HP	helipad
HQTA	High-Quality Transit Area
IPaC	Information for Planning and Consultation
L_{dn}	day-night average level
L_{eq}	equivalent continuous sound level
LESA	Land Evaluation and Site Assessment
L_{max}	maximum instantaneous noise level
LOS	level of service
LRA	Local Responsibility Area
MRZ-3	Mineral Resource Zone 3
N_2O	nitrous oxide
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
O_3	ozone
OSHA	Occupational Safety and Health Administration
Pb	lead
PFCs	perfluorocarbons
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size

ppb	parts per billion
PRC	Public Resources Code
RWQCB	Regional Water Quality Control Board
RWRF	Regional Wastewater Reclamation Facility
SB 2	Senate Bill 2
SB 743	Senate Bill 743
SB 1383	Senate Bill 1383
SF_6	sulfur hexafluoride
SHTAC	Swainson's Hawk Technical Advisory Committee
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO_2	sulfur dioxide
SOI	Sphere of Influence
SR-168	State Route 168
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Program
SWRCB	State Water Resources Control Board
TCRs	Tribal Cultural Resources
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled

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1.0 PROJECT INFORMATION

1. **Project Title:**

   Tract Map 6343

2. **Lead Agency Name and Address:**

   City of Clovis
   1033 Fifth Street
   Clovis, CA 93612

3. **Contact Person and Phone Number:**

   Lily Cha, Senior Planner
   (559) 324-2335
   lilyc@cityofclovis.com

4. **Project Location:**

   Southwest of the intersection of East Behymer Avenue and North Sunnyside Avenue. Assessor Parcel Numbers (APNs): 556-040-07S, 556-040-08S, 556-030-14S

5. **Project Sponsor's Name and Address:**

   Wilson Premier Homes, Inc.
   7550 North Palm Avenue, Suite 102
   Fresno, CA 93711

6. **General Plan Designation:**

   Medium Density Residential

7. **Zoning:**

   Exclusive Agricultural District (AE-20) (Fresno County)

8. **Description of Project:**

   The proposed project would consist of the annexation of 246 acres by the City of Clovis (City), and the development of 590 residential lots in a 71.54-acre project site. Average lot size would be approximately 3,329 square feet. No development is proposed within the remaining 174.46-acre annexation area surrounding the project site. The proposed project would include annexation of the 246-acre area from Fresno County jurisdiction to the City. Any future development occurring within the annexation area would require a separate project-specific analysis.

   The project site is located on the southwest quadrant of the intersection between East Behymer Avenue and North Sunnyside Avenue, as shown on Figure 1-1. The project site is located within the City of Clovis' existing Sphere of Influence (SOI) and within the Northwest Urban Center area identified in the 2014 City of Clovis General Plan, now referred to as Heritage Grove. As such, this area is already planned and designated for urban growth and environmentally evaluated at

the programmatic level in the City's General Plan Environmental Impact Report (EIR).[1] The project site is currently being used for agriculture and contains one existing dwelling unit and associated structures. Parcel APN 556-030-14S of the project site is currently under a Williamson Act contract; however, a petition for a contract cancellation is currently in progress. The project site is bounded by East Behymer Avenue to the north, by the Enterprise Canal to the west and south, and by rural residential, a Fresno Metropolitan Flood Control District (FMFCD) ponding basin (Basin BY), and Tract Map 6200 to the east. Figure 1-2 shows the project site and surrounding land uses.

The proposed project would be developed over a period of approximately 33 months and over three Phases. There would also be 66 outlot spaces included in the proposed residential development. Although the site plan does not provide details on what would be constructed in these spaces, potential uses for the outlots would include private road, private parking, private pedestrian, private landscaping, public utility, and public park uses. The proposed project would include the removal of one existing 2,679-square-foot dwelling unit and garage, an existing propane tank, a 2,000-square-foot pole barn, two sheds of 1,785-square-foot and 2,250-square-foot dimensions, and an existing driveway on the project site. Figure 1-3 shows the site plan for the proposed project.

Phase 1 of the proposed project would include the development of 136 single-family residential units with an average size of approximately 1,514 square feet per unit. Phase 1 would be located on the southern portion of the project site and would be accessed through one ingress and egress driveway located on Perrin Avenue. Phase 1 would include the construction of approximately 44 parking spaces, an approximately 8,745-square-foot community pool and recreation area, a approximately 13,930-square-foot community park, approximately 0.51 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along Perrin Avenue. The southern extension of North Baron Avenue from East Behymer Avenue and the extension of Perrin Avenue and Hammel Avenue within the project site would be constructed during Phase 1. Figure 1-4 shows a site plan of Phase 1 of the proposed project.

Phase 2 of the proposed project would include the development of 214 single-family residential units with an average size of approximately 2,168 square feet per unit. Phase 2 would be located on the central portion of the project site and would be accessed through one gated ingress and egress driveway located along the future southern extension of North Baron Avenue, and one driveway along Hammel Avenue. Phase 2 would include the construction of a 26-foot-wide drainage channel along Perrin Avenue, approximately 0.35 acre of landscaped areas, and storm drainage and pedestrian infrastructure improvements along Perrin Avenue and Hammel Avenue. Figure 1-5 shows a site plan of Phase 2 of the proposed project.

Phase 3 of the proposed project would include the development of 240 single-family residential units with an average size of approximately 1,514 square feet per unit. Phase 3 would be located on the northern portion of the project site and would be accessed through two gated ingress

[1] City of Clovis. 2014. General Plan and Development Code Update PEIR. Website: https://cityofclovis.com/planning-and-development/planning/master-plans/general-plan/environmental-impact-report/ (accessed December 8, 2022).

and egress driveways located along the future southern extension of North Baron Avenue, and through one gated driveway located along the future northern extension of Hammel Avenue. Phase 3 would include the construction of approximately 91 parking spaces, an approximately 9,985-square-foot pool and recreation area, approximately 0.65 acre of landscaped areas, and drainage and pedestrian infrastructure improvements along North Baron Avenue. Figure 1-6 shows a site plan of Phase 3 of the proposed project.

Water supply for the proposed project would be provided by the City of Clovis. The project would require the construction of a 24-inch water main along Behymer Avenue from Clovis Avenue to Baron Avenue. Additionally, the project would construct a 24-inch main along Baron Avenue, from Behymer Avenue to Perrin Avenue. The proposed improvements would be consistent with the City's Water Master Plan and the City's specifications on materials, depth, and resurfacing.

Wastewater services for the proposed project would be provided by the City of Clovis. The proposed project would connect to an existing wastewater main within the right-of-way of North Baron Avenue.

The FMFCD would provide flood control and urban storm water services to the project site. Stormwater from the project site would be drained through surface and subsurface drainage infrastructure located along North Baron Avenue, Perrin Avenue, and Hammel Avenue as well as along internal roadways in the project site and redirected towards FMFCD Basin BY, which is located adjacent to the project site's eastern boundary.

In addition, an approximately 1,300-foot-long, 26-foot-wide drainage channel would be constructed along the north side of the Perrin Avenue extension to direct stormwater flows west from the project site towards drainage infrastructure along the Enterprise Canal.

Storm drainage pipelines would be constructed along North Baron Avenue and along interior roadways in the project site to drain stormwater from the project site towards Basin BY. These storm drainage facilities would be constructed pursuant to requirements of the FMFCD Master Plan.

Solid waste collection for the project site would be provided by the City of Clovis, and recycling and green waste collection would be provided by Republic Services.

Electricity and natural gas services for the proposed project would be supplied by PG&E through connections to existing service lines. Telecommunication services to the project site would be provided by Comcast and AT&T.

Access to the project site would be provided by East Behymer Avenue and by a southern extension of North Baron Avenue, to be constructed during Phase 1 of the proposed project along the eastern boundary of the project site. The proposed project would construct approximately 2,650 feet of North Baron Avenue south of East Behymer to connect with the existing stretch of North Baron Avenue located southeast of the project site. This portion of North Baron Avenue would be approximately 49 feet wide and have two lanes. An

approximately 20-foot-wide parkway containing an approximately 6-foot-wide pedestrian sidewalk and landscaped areas would be included along the western side of North Baron Avenue along the project site. An approximately 16-foot-wide parkway containing an approximately 6-foot-wide pedestrian sidewalk and landscaped area that is reduced from the Heritage Grove Neighborhood Boulevard Street section would be included along the eastern side of North Baron Avenue, along the FMFCD Basin BY frontage. The eastern side of North Baron Avenue that is north of Basin BY will ultimately be built out with an approximately 20-foot-wide parkway, matching the Heritage Grove Neighborhood Boulevard Street section. However, this section of the parkway will not be constructed with Tract 6343 in order to minimize the impact on the adjacent rural residential property. The pedestrian walk will continue north of Basin BY to East Behymer Avenue with Tract 6343, but will temporarily be constructed to share a combination pedestrian and widened bike lane as approved by the City Engineer with the project design plans.

To access the project site, three gated ingress and egress driveways would be constructed along the southern extension of North Baron Avenue. One gated ingress and egress driveway would also be constructed along Hammel Avenue. A temporary secondary access connecting Hammel Avenue to North Baron Avenue would be constructed along the northern end of Hammel Avenue during Phase 3. One gated ingress and egress driveway and one gated emergency access driveway would be constructed along Perrin Avenue.

Vehicle circulation within the project site would be provided by a network of two-way, 37.2-foot-wide private streets. Internal roadways within the project site would include Hammel Avenue, which is located along the project site's western boundary, and Perrin Avenue, which crosses the project site west to east.

9. Surrounding Land Uses and Setting:

The 71.54-acre project site is located in the City of Clovis' SOI, within the Northwest Urban Center area identified in the City's General Plan that is now referred to as Heritage Grove. The surrounding 246-acre annexation area encompasses the project site. The project site and annexation area include existing residential and agricultural uses. The project site and annexation area are surrounded by agricultural and single-family residential uses to the south, rural residential and agricultural uses to the east, agricultural and commercial uses to the west, and agricultural and rural residential uses to the north.

10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):

- County of Fresno/City of Clovis – Williamson Act Contract Cancellation
- Fresno Local Agency Formation Commission – Annexation
- State Water Resources Control Board – National Pollutant Discharge Elimination System (NPDES) General Permit (with requisite Storm Water Pollution Prevention Plan, Conceptual Storm Water Pollution Prevention Plan, and Permanent Control Measures)

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

In compliance with Assembly Bill 52 (AB 52), on November 4, 2022, the City sent letters regarding the proposed project to Big Sandy Rancheria of Western Mono Indians, Cold Springs Rancheria of Mono Indians, Dumna Wo-Wah Tribal Government, Kings River Choinumni Farm Tribe, North Fork Rancheria of Mono Indians, North Valley Yokuts Tribe, Picayune Rancheria of Chuckchansi Indians, Table Mountain Rancheria, Traditional Choinumni Tribe, Tule River Indian Tribe, and Wuksache Indian Tribe/Eshom Valley Band tribes based on the list of tribes provided by the Native American Heritage Commission (NAHC). Table Mountain Rancheria sent a response to the City on November 15, 2022, requesting the Cultural Resources Assessment[2] prepared for the project, and did not request any further consultation. No further responses or requests for consultation were received by the City within the 30-day consultation period beginning November 4, 2022, and ending December 3, 2022. As such, AB 52 requirements for the proposed project have been fulfilled. AB 52 consultation request and response letters are included in Appendix A of this Initial Study.

[2] Peak & Associates, Inc. 2022. Cultural Resource Assessment for the Tentative Tract Map 6343 and City of Clovis Annexation Area, County of Fresno, California. September 21.

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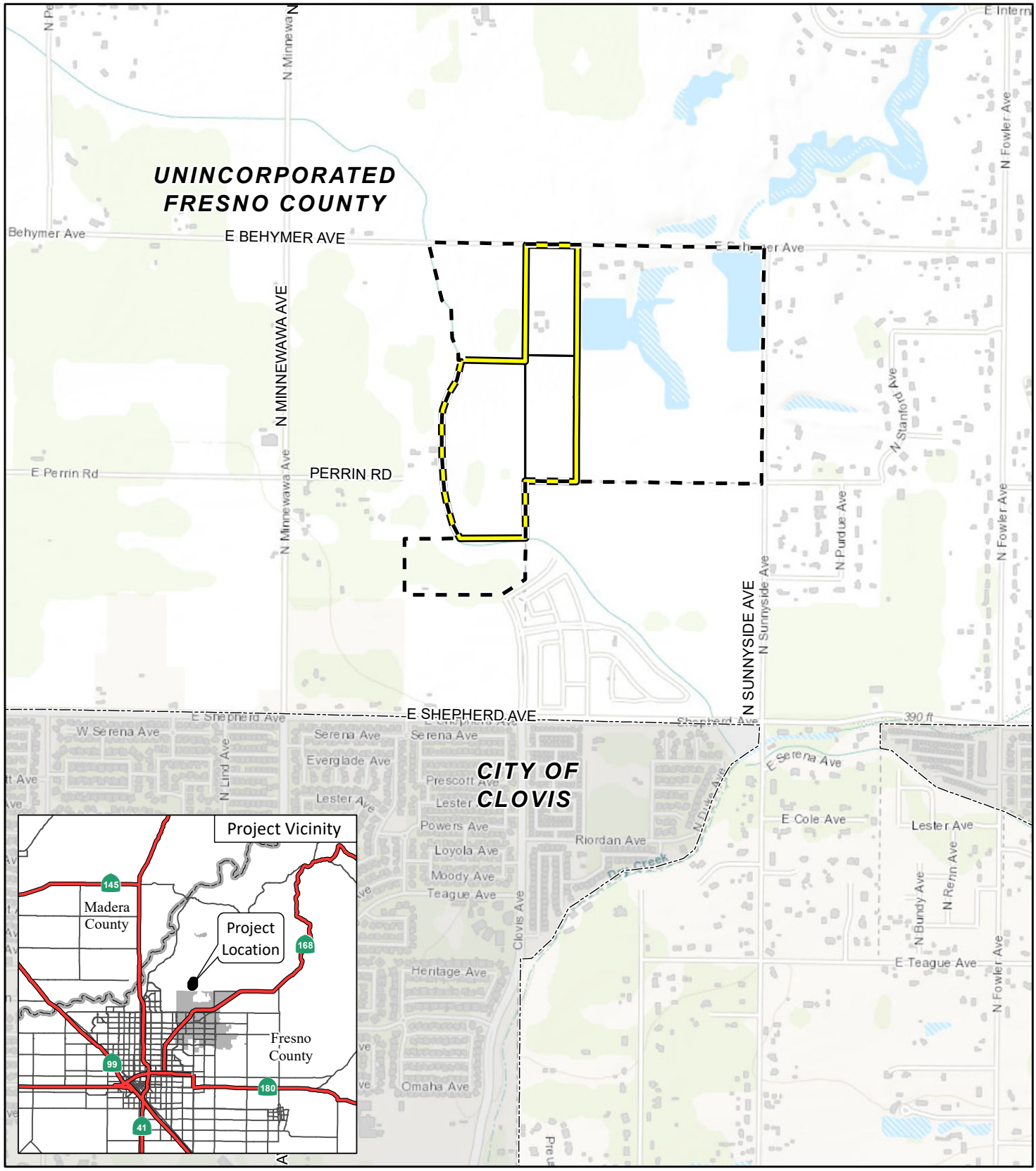

LSA

LEGEND

- Project Location
- Parcel Boundary
- Annexation Boundary
- Clovis City Limit

0 750 1500
FEET

SOURCE: Esri Streetmap (2021)

\\lsaazfiles.file.core.windows.net\images\CIT2201\GIS\MXD\Regional_Local_Context.mxd (12/6/2022)

FIGURE 1-1

Tract Map 6343

Regional and Local Context

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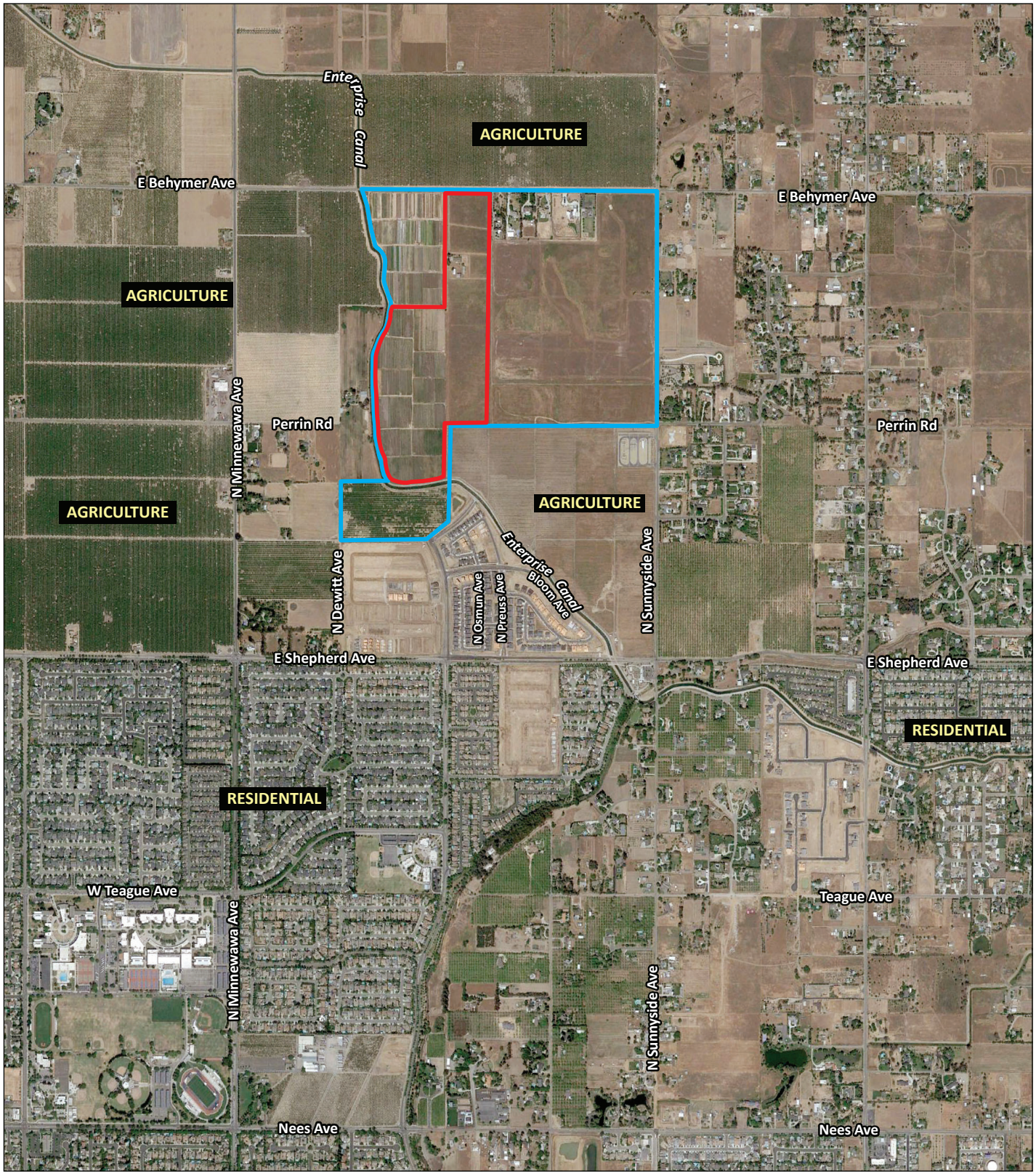

LSA

Project Site TM-6343 Boundary

Annexation Boundary

N

0 1000 2000

FEET

FIGURE 1-2

Tract Map 6343

Aerial Photograph of the Project Site and Surrounding Land Uses

SOURCES: Google Earth 4/21/2021; LSA, 2022

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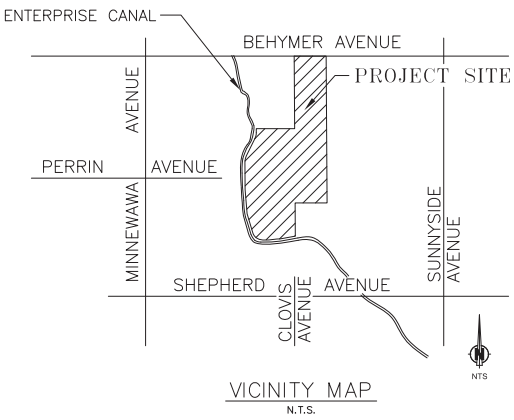

VICINITY MAP
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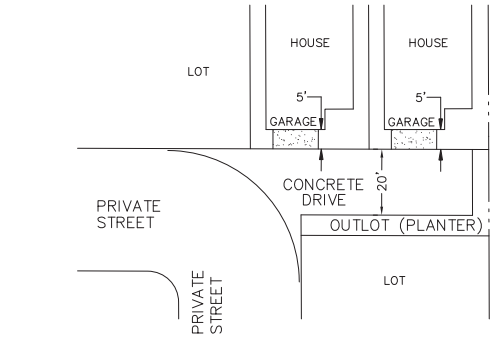
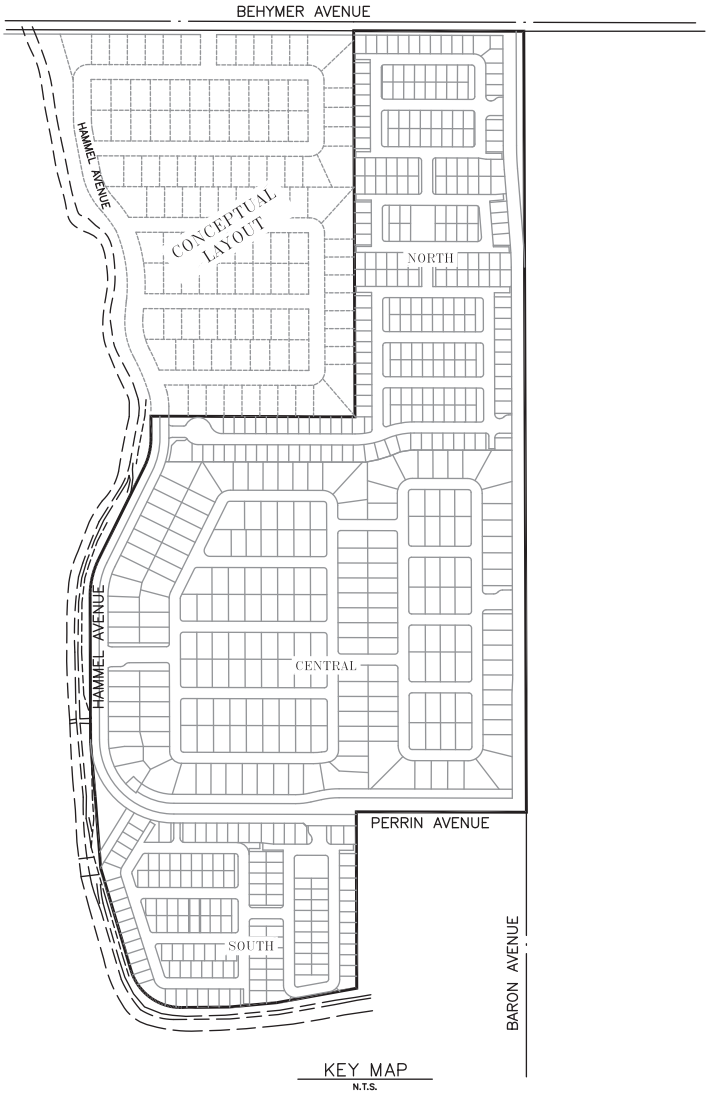


TYPICAL FINGER ROAD DETAIL
N.T.S.



KEY MAP
N.T.S.

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FIGURE 1-3

NOT TO SCALE

SOURCE: Harbor & Associates, January 2022

:\CIT2201\G\General Site Plan.ai (9/22/2022)

Tract Map 6343
General Site Plan

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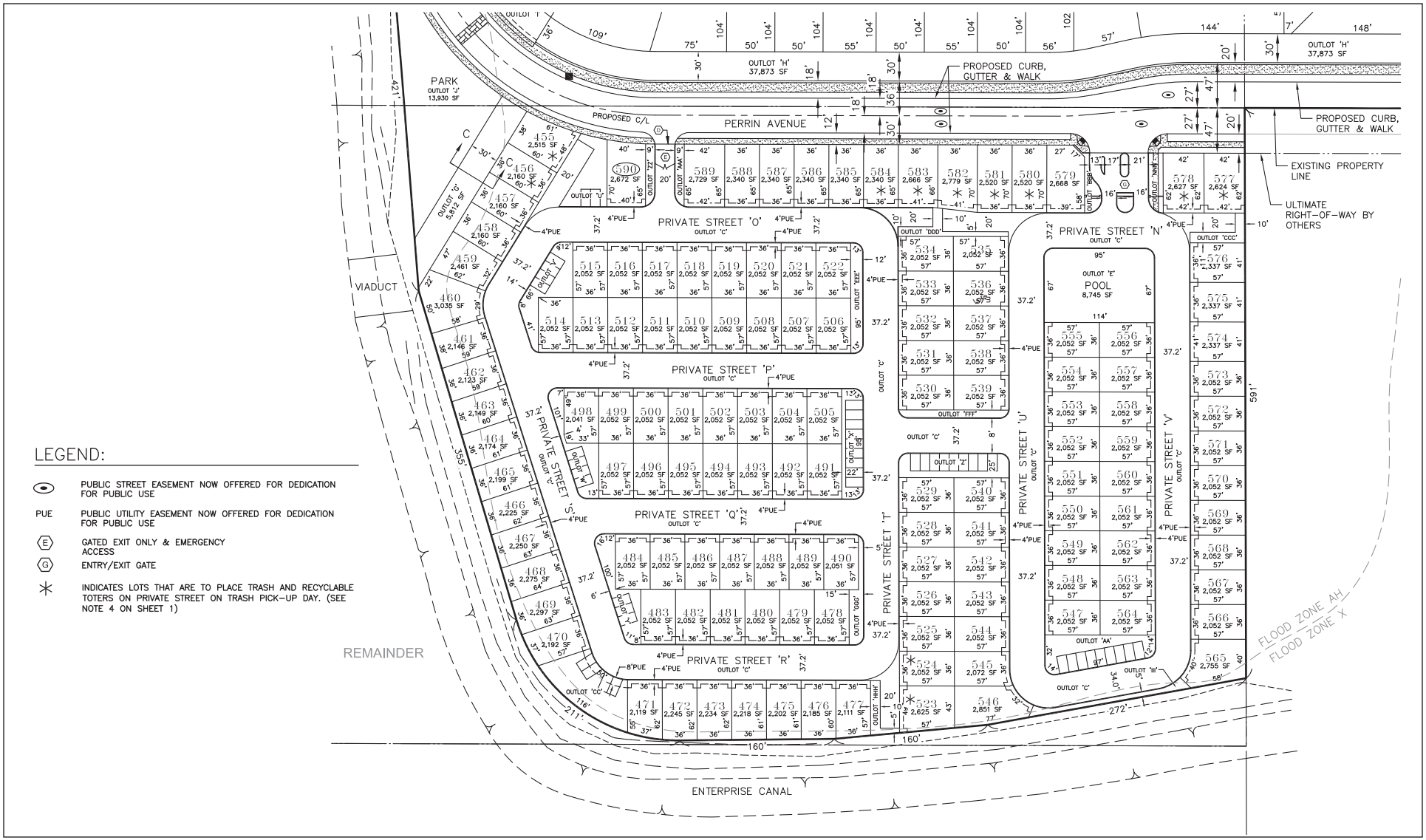

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FIGURE 1-4

Tract Map 6343
South: Phase 1

SOURCE: Harbor & Associates, January 2022

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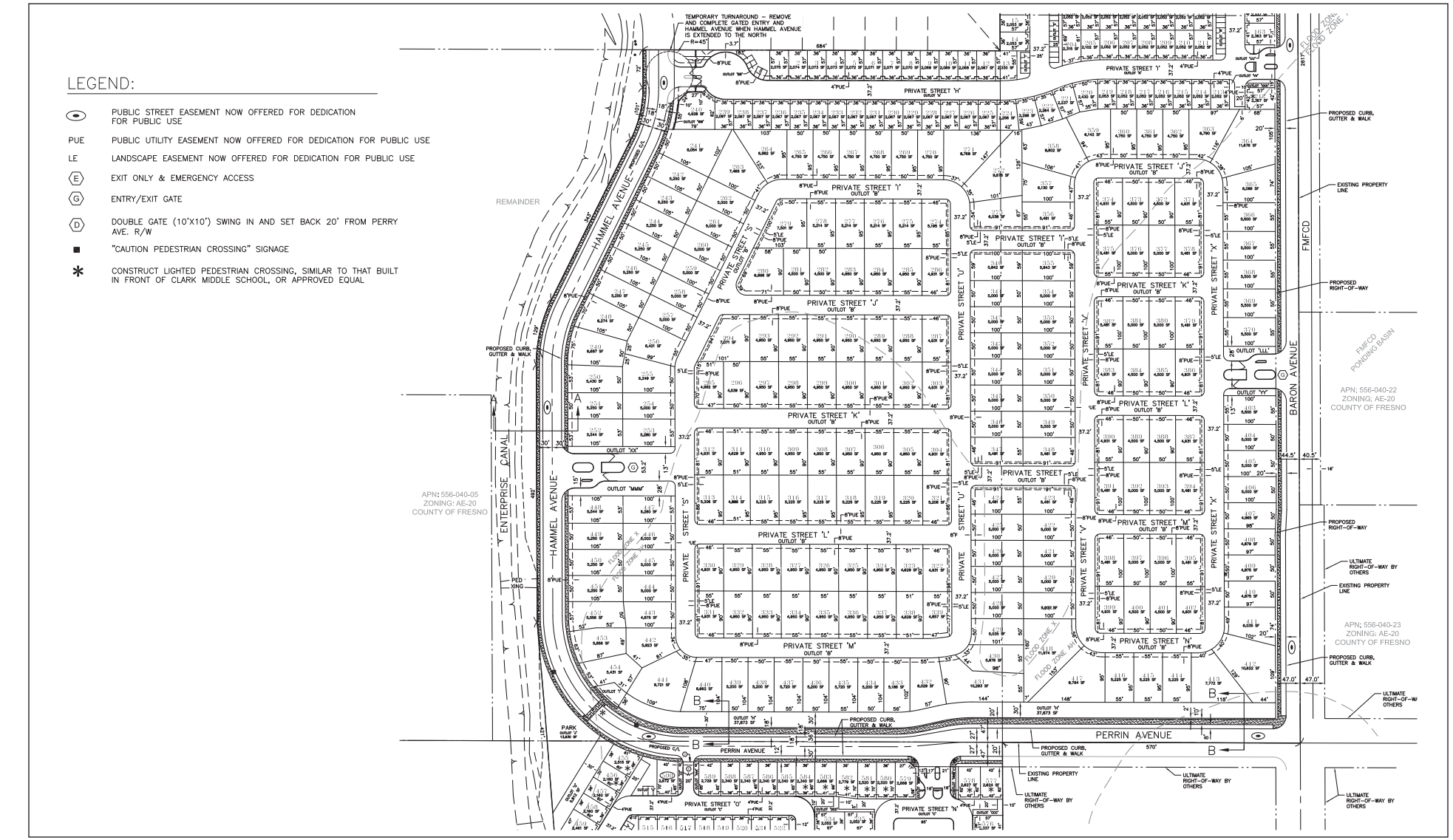

FIGURE 1-5

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SOURCE: Harbor & Associates, January 2022

:\CIT2201\G\Central-Phase 2.ai (9/22/2022)

Tract Map 6343
Central: Phase 2

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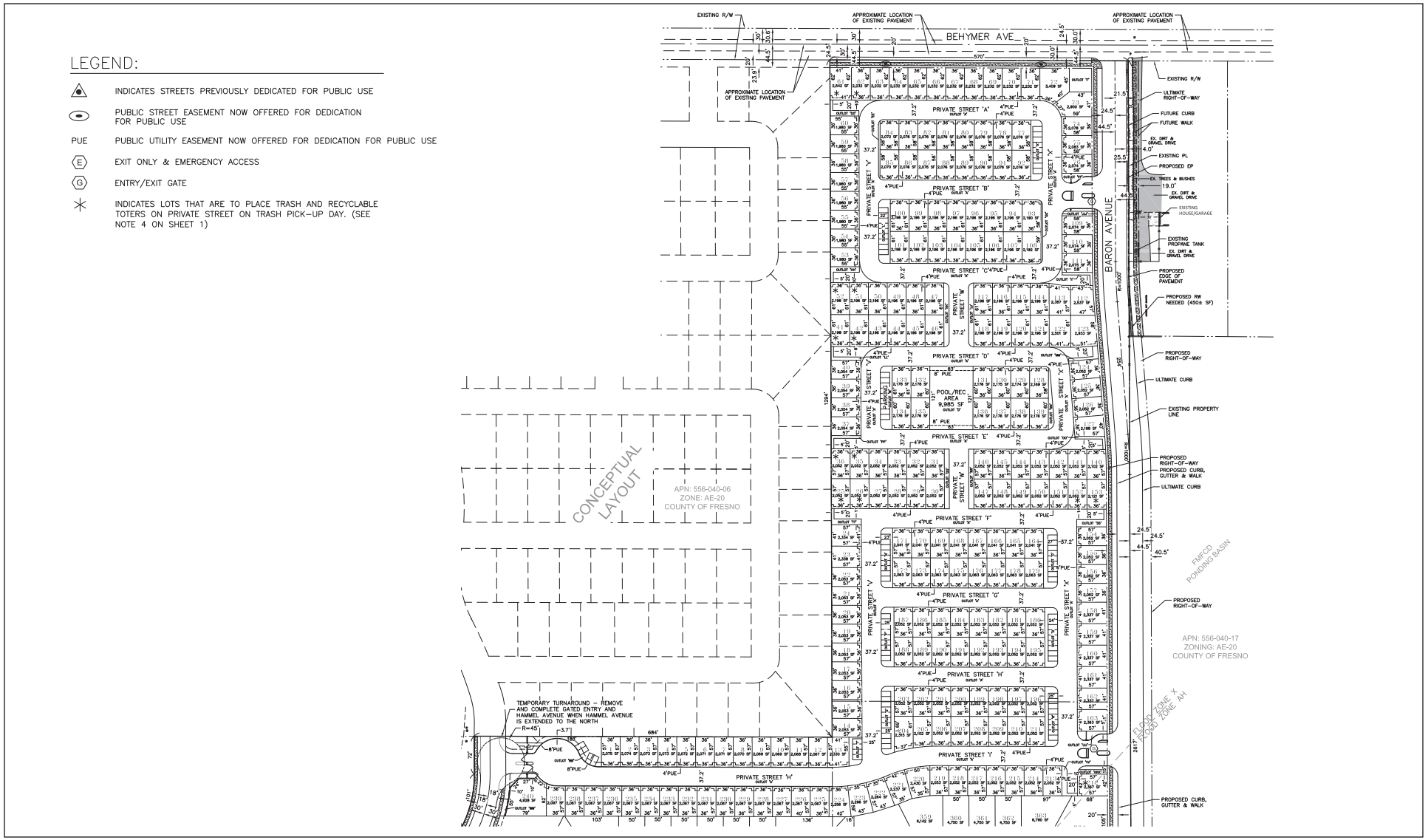

LSA

FIGURE 1-6

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SOURCE: Harbor & Associates, January 2022

:\CIT2201\G\North-Phase 3.ai (9/22/2022)

Tract Map 6343
North: Phase 3

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2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 3.0.

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

2.1 DETERMINATION

On the basis of this initial evaluation:

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

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

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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

Signature _____ Date _____

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3.0 CEQA ENVIRONMENTAL CHECKLIST

3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a 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?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.1.1 Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

Less Than Significant Impact. A scenic vista is generally defined as a public vantage point with an expansive view of a significant landscape feature. The Open Space and Conservation Element of the City of Clovis' General Plan identifies Clovis Avenue, Shaw Avenue, and Herndon Avenue as gateways to the community and important visual links to Old Town Clovis from the greater Fresno area. Other arterial roadways that travel east-to-west through the Clovis, such as Shepherd Avenue, Bullard Avenue, and Ashlan Avenue, span the community's suburban/rural interface and therefore can also be construed as scenic corridors. These roadways provide a scenic and character transition through the nearly built-out core of Central Clovis into its pastoral agrarian areas to the north, east, and south.

The project site is currently undeveloped and used for agriculture. The project site is located in the vicinity of West Shepherd Avenue, one of the scenic corridors identified in the General Plan. The project site is also located within the City's Northwest Urban Center, now referred to as Heritage Grove, which offers some of the most direct and unobstructed views of the Sierra Nevada and foothills in the City.[3] The Heritage Grove area is specifically planned for urban growth. The proposed project would develop the 71.54-acre project site into a 590-lot single-family residential development. Although implementation of the proposed project would change the existing

[3] City of Clovis. 2014. General Plan and Development Code Update PEIR. Aesthetics. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-01-Aesthetics.pdf (accessed April 14, 2022).

agricultural land uses in the project site to a single-family residential use, the proposed residential use of the project site would be similar to existing residential uses south of the site, and therefore, the addition of single-family residences at the site would not substantially change views from public vista points. Additionally, the proposed single-family residences to be constructed at the project site would be consistent in size and scale to existing residential units in the vicinity of the project site and would not introduce oversized elements that could obstruct distant views of the Sierra Nevada and foothills.

Therefore, the proposed project would not have a substantial effect on scenic vistas in the vicinity of the project site, and the impact would be less than significant. This topic will not be discussed in the EIR.

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. According to the California Department of Transportation (Caltrans) mapping of State Scenic Highways[4], there are no state-designated scenic highways in or near the City of Clovis. However, State Route 168 (SR-168), an Eligible State Scenic Highway located approximately 2.5 miles south of the project site, bisects the City in a southwest to northeast direction.[5] No Officially Designated or Eligible State Scenic Highways are located within or in the immediate vicinity of the project site. Therefore, the proposed project would not impact a designated or eligible State Scenic Highway or impact scenic resources located within the highway segments or its viewshed. Therefore, no impact on scenic resources within a State Scenic Highway would occur as a result of the proposed project. This topic will not be discussed in the EIR.

c. In non-urbanized areas, 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 a 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. The proposed project would include the construction of a 590-lot single-family residential development. The project site is currently undeveloped and used for agriculture, and it is surrounded by agricultural and single-family residential uses to the south, rural residential and agricultural uses to the east, agricultural and commercial uses to the west, and agricultural and rural residential uses to the north. The proposed project would change the agricultural use of the site to a residential use. Furthermore, the proposed project would introduce Single-Family Planned Residential Development (R-1-PRD) uses into a site zoned within the Exclusive Agricultural Zoning District (AE-20) of Fresno County.

The proposed project is located within Heritage Grove, a growth area identified for development in the City's General Plan. The proposed project would require approval from Fresno County Local

[4] California Department of Transportation (Caltrans). State Scenic Highways. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed May 12, 2022).

[5] *Ibid.*

Agency Formation Commission (Fresno LAFCo) for annexation to the City of Clovis. After annexation to the City, site zoning would be compatible with the proposed residential use of the proposed project. Additionally, the single-family residences to be constructed on the project site would be consistent in size and scale to existing residential units to the south of the project site.

Therefore, the proposed project would not conflict with applicable zoning or other regulations governing scenic quality in the City and would not substantially degrade the existing visual character or quality of public views of the project site and its surroundings, and the impact would be less than significant. This topic will not be discussed in the EIR.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The proposed project would include the construction of 590 new single-family residential units within the project site, as well as landscaped, recreational, and utility areas. The construction of new buildings and infrastructure would introduce new sources of light into the project site and vicinity. Compliance with California Building Code (Title 24, California Code of Regulations) standards would reduce potential light and glare impacts. Furthermore, the City's Development Code Update outlines performance standards related to exterior lighting to reduce impacts from new light sources under Article 3 (Development and Operational Standards), Section 9.22.050 (Exterior Light and Glare). Section 9.22.050 states the following:

A. **Exterior Lighting**

1. Exterior Lighting shall be:

   a. Architecturally integrated with the character of on-site and adjacent structure(s);

   b. Directed downward and shielded so that all direct light and glare is confined within the boundaries of the subject parcel;

   c. Installed so that lights not blink, flash, or be of unusually high intensity or brightness. The blink and flash provision does not apply to allowed seasonal decorations in residential areas, 9.34.060(P). The unusually high intensity or brightness provision shall apply in all instances; and

   d. Appropriate in height, intensity, and scale to the uses they are serving.

2. Exterior lighting shall not:

   a. Exceed 150 watts (or equivalent) or directly illuminate or be visible from adjacent properties.

   b. Result in:

1) Indirect illumination of adjacent properties in excess of 0.5 foot-candles;

2) A point of overlap between light patterns greater than seven feet for pedestrian lighting systems; or

3) An intensity of lighting within the physical limits of an area required to be lighted that is greater than seven foot-candles.

B. **Security Lighting.** Security lighting shall be provided at all entrances/exits to structures. The minimum illumination shall be two footcandles at ground level in front of the entrance/exit.

C. **Shielded Lighting.** Light sources shall be shielded to direct light rays onto the subject parcel only. The light source, whether bulb or tube, shall not be directly visible from an adjacent property or public street rights-of-way. This Section does not apply to public street lighting, sign illumination, or traffic safety lighting.

Implementation of State and local policies and standards would reduce impacts associated with light and glare through the adoption and enforcement of development design standards. Additionally, the new sources of light and glare introduced by the proposed project would be comparable to the existing light and glare emitted by residential uses located south of the project site. Therefore, the adverse impacts related to light and glare resulting from the proposed project would be less than significant. This topic will not be discussed in the EIR.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☒	☐

3.2.1 Impact Analysis

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. The project site is classified as "Unique Farmland" and "Farmland of Local Importance" by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP)[6]. The proposed project would develop the 71.54-acre project site into a 590-lot single-family residential development. Therefore, development of the proposed project would result in the conversion of Unique Farmland and Farmland of Local Importance to a non-agricultural use.

[6] California Department of Conservation. 2016. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed April 14, 2022).

The City of Clovis General Plan identifies that build out of the General Plan would result in a significant unavoidable impact related to the conversion of Important Farmland to non-agricultural uses.

Mitigation Measure 2-1 of the General Plan EIR addresses conversion of important farmland associated with build out of the General Plan, and requires project applicants for properties that include 20 acres or more of designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland to prepare or fund an agricultural resource evaluation, such as a Land Evaluation and Site Assessment (LESA) Model, prior to project approval. The Senate Bill 2 (SB 2) Farmland Impact Assessment[7] prepared for the City of Clovis prepared a LESA Model for the Heritage Grove growth area, which includes the project site, and concluded that conversion of farmland in the Heritage Grove growth area would result in significant unavoidable impacts to important farmland, consistent with the determination of the General Plan EIR.

Additionally, Mitigation Measure 2-1 requires that if farmland conversion is deemed significant, the City would require mitigation at a 1:1 ratio of converted to preserved acreage, or payment of its valuation equivalent if a fee mitigation program is established, or mitigation through a regional agricultural preservation program, if applicable. However, the General Plan EIR does state that even with implementation of Mitigation Measure 2-1, conversion of farmland through build out of the General Plan would represent a significant unavoidable impact. As such, farmland conversion covered under the General Plan cannot be mitigated.

Figure 5.2-5 in the Agriculture and Forestry section of the General Plan EIR identifies the location of Important Farmland in the City's Planning Area to be converted by buildout of the General Plan.[8] Sections of the proposed project currently used for agricultural activities are included among the Important Farmland to be converted by buildout of the General Plan. Additionally, the proposed project is located within Heritage Grove, a growth area identified for development in the General Plan. Development of the proposed project would be consistent with planned growth under the General Plan, and therefore, would not result in unplanned impacts to Important Farmland. Therefore, a less than significant impact would occur. This topic will not be discussed in the EIR.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Less Than Significant Impact. The project site is zoned within the Exclusive Agricultural Zoning District (AE-20) of Fresno County. In addition, the project site contains APN 556-030-14S, which is currently under a Williamson Act contract. Following approval of the proposed project and certification of the EIR, the City and Project Applicant will apply to have the project site and annexation area annexed into the City of Clovis and cancellation of the Williamson Act contract, respectively.

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7 LSA Associates, Inc. 2022. Farmland Impact Assessment, Heritage Grove SB 2 Grant Technical Studies Project, City of Clovis, California. February 2022.

8 City of Clovis. 2014. General Plan and Development Code Update PEIR. Agriculture and Forestry Resources. Figure 5.2-5: Important Farmland Converted at General Plan Buildout. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-02-Agriculture-and-Forestry-Resources.pdf (accessed July 7, 2022).

As noted in the SB 2 Farmland Impact Assessment prepared for the City for the Heritage Grove Growth Area, APN 556-030-014S (the project site) is currently under a Williamson Act contract. A petition for cancellation and statutory findings to support cancellation of the Williamson Act contract would need to be submitted by the Project Applicant as set forth under Government Code Section 51282(a). Additionally, payment of a cancellation fee equal to 12.5 percent of the unrestricted market value of the parcel is required as set forth under Government Code Section 51283(b). The cancellation process for APN 556-030-014S will be completed prior to development of the proposed project.

After annexation of APN 556-030-14S to the City of Clovis and cancellation of the Williamson Act contract, the parcel could develop uses that comply with the zoning designation of the parcel per the City's Zoning Code without the proposed development being inconsistent with a Williamson Act contract.

Furthermore, the City's General Plan identified a significant and unavoidable impact related to conversion of agricultural land uses in the Heritage Grove area to non-agricultural use. As a result, the potential impacts related to conflicts with existing zoning for agricultural use or a Williamson Act contract have been previously addressed in the General Plan EIR, and this project would not result in a new impact. As a result, a less-than-significant impact would occur. This topic will not be discussed in the EIR.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The project site is zoned within the Exclusive Agricultural Zoning District (AE-20) of Fresno County. The project site is not currently used for timberland production, nor is it zoned for forest land or timberland. No forest lands or timberland are located on the project site. The proposed project would not conflict with the existing zoning for, or cause rezoning of forest land or conversion of forest land to non-forest uses. Therefore, the proposed project would have no impact on forest land or timberland. This topic will not be discussed in the EIR.

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

No Impact. Please refer to the discussion for c) above. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest uses. Therefore, the proposed project would have no impact. This topic will not be discussed in the EIR.

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. Please refer to discussions a) and c) of this section. The project site is not used for timberland production or zoned for forest land or timberland. The project site is classified as "Unique Farmland" and "Farmland of Local Importance" by the California Department

of Conservation FMMP. The proposed project would result in the conversion of farmland to non-agricultural uses. However, conversion of farmland resulting from the proposed project has already been identified in the General Plan EIR, and it would be consistent with planned growth in the City of Clovis under the General Plan. As a result, the proposed project would not result in the conversion of forestland or timberland, or the unplanned conversion of farmland beyond what has been identified by the General Plan. Therefore, the impact would be less than significant. This topic will not be discussed in the EIR.

3.3 AIR QUALITY

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

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

3.3.1 Impact Analysis

The proposed project is in the City of Clovis' existing Sphere of Influence and northwest planned growth area. The project falls within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD is responsible for air quality regulation within the eight-county San Joaquin Valley region.

Both the California Air Resources Board (CARB) and the United States Environmental Protection Agency (EPA) have established health-based Ambient Air Quality Standards for six criteria air pollutants: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), particulate matter less than 10 microns in size (PM_{10}), and particulate matter less than 2.5 microns in size ($PM_{2.5}$). These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. Pollutants such as PM, CO, SO_2, and Pb are considered local pollutants because they tend to accumulate in the air locally. The San Joaquin Valley Air Basin (Air Basin) is under State non-attainment status for ozone and particulate matter (PM_{10} and $PM_{2.5}$) standards. The Air Basin is also classified as non-attainment for both the federal ozone 8-hour standard and the federal $PM_{2.5}$ 24-hour standard.

A threshold of significance is defined by the SJVAPCD in its Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) as an identifiable quantitative, qualitative, or performance level of a particular environmental effect. Non-compliance with a threshold of significance means the effect will normally be determined to be significant. Compliance with a threshold of significance means the effect normally will be determined to be less than significant. The SJVAPCD has established

thresholds of significance for criteria pollutant emissions generated during construction and operation of projects as shown in Table 3.A below.[9]

Table 3.A: SJVAPCD Construction and Operation Thresholds of Significance (tons/yr)

	CO	NO_X	ROG	SO_X	PM_{10}	$PM_{2.5}$
Construction Thresholds	100	10	10	27	15	15
Operation Thresholds	100	10	10	27	15	15

Source: Guidance for Assessing and Mitigating Air Quality Impacts (SJVAPCD 2015a.)
CO = carbon monoxide
NO_X = oxides of nitrogen
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gas
SJVAPCD = San Joaquin Valley Air Pollution Control District
SO_X = oxides of sulfur
tons/yr = tons per year

The emissions thresholds in the SJVAPCD GAMAQI were established based on the attainment status of the air basin in regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emission thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The California Environmental Quality Act (CEQA) requires that certain proposed projects be analyzed for consistency with the applicable air quality plan. An air quality plan describes air pollution control strategies to be implemented by a city, county, or region classified as a non-attainment area. The main purpose of the air quality plan is to bring the area into compliance with the requirements of the federal and State air quality standards. To bring the Air Basin into attainment, the SJVAPCD adopted the 2016 Plan for the 2008 8-Hour Ozone Standard in June 2016 to satisfy Clean Air Act requirements and ensure attainment of the 75 parts per billion (ppb) 8-hour ozone standard.[10]

To assure the Air Basin's continued attainment of the EPA PM_{10} standard, the SJVAPCD adopted the 2007 PM_{10} Maintenance Plan in September 2007. SJVAPCD Regulation VIII (Fugitive PM_{10} Prohibitions) is designed to reduce PM_{10} emissions generated by human activity. The SJVAPCD adopted the 2016 Moderate Area Plan for the 2012 $PM_{2.5}$ standard to address the EPA federal annual $PM_{2.5}$ standard of 12 micrograms per cubic meter ($\mu g/m^3$), established in 2012. In addition, the SJVAPCD is in the process of developing an attainment strategy to address multiple $PM_{2.5}$

[9] San Joaquin Valley Air Pollution Control District. 2015b. Air Quality Thresholds of Significance – Criteria Pollutants. Website: http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf (accessed on April 14, 2022).

[10] San Joaquin Valley Air Pollution Control District. 2016. 2016 Plan for the 2008 8-Hour Ozone Standard. Website: www.valleyair.org/Air_Quality_Plans/Ozone-Plan-2016.htm (accessed April 14, 2022).

standards (1997, 2006, and 2012 $PM_{2.5}$ standards) and a plan to demonstrate maintenance of the 1987 PM_{10} standard as required under the federal Clean Air Act.

For a project to be consistent with SJVAPCD air quality plans, the pollutants emitted from a project should not exceed the SJVAPCD emission thresholds or cause a significant impact on air quality. Construction and operation of the proposed project may result in an increase in air pollutant emissions. As a result, the proposed project could have a potential adverse effect on the SJVAPCD's implementation of clean air plans. Therefore, the EIR will provide further analysis of the proposed project's consistency with the SJVAPCD's clean air plans.

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?

Potentially Significant Impact. CEQA defines a cumulative impact as two or more individual effects, which when considered together, are considerable or which compound or increase other environmental impacts. Therefore, if annual emissions of construction- or operational-related criteria air pollutants exceed any applicable threshold established by the SJVAPCD, the proposed project would result in a cumulatively significant impact.

Short-term emissions would occur in association with construction activities, including grading, and vehicle/equipment use. Long-term operational emissions are associated with stationary sources and mobile sources. Stationary source emissions result from the consumption of natural gas and electricity. Mobile source emissions result from vehicle trips and result in air pollutant emissions affecting the entire air basin. As noted above, specific criteria for determining whether the potential air quality impacts of a project are significant are set forth by the SJVAPCD.

Construction and operation of the proposed project would result in the emission of air pollutants in the Air Basin, which is currently in non-attainment for federal and State air quality standards. Therefore, implementation of the proposed project could potentially contribute to air quality impacts, which could cause a cumulative impact in the Air Basin. Therefore, the EIR will provide further analysis of cumulative air pollutant emissions associated with the project.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Sensitive receptors are defined as residential uses, schools, daycare centers, nursing homes, and medical centers. Exposure from diesel exhaust associated with construction activity contributes to both cancer and chronic non-cancer health risks. The closest potentially sensitive receptors to the project site include residential uses located directly adjacent to the project site's eastern boundary and residential uses that are currently under construction south of the project site.

Construction of the proposed project may expose surrounding sensitive receptors to airborne particulates, as well as a small quantity of construction equipment pollutants (i.e., usually diesel-fueled vehicles and equipment). Therefore, the EIR will provide further analysis of air pollutant emissions associated with the proposed project.

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. During construction of the proposed project, the various diesel-powered vehicles and equipment in use on site and off site would create localized odors. These odors would be temporary and are not likely to be noticeable for extended periods of time beyond the project site. The potential for diesel odor impacts is therefore considered less than significant. In addition, the proposed uses that would be developed within the project site are not expected to produce any offensive odors that would result in frequent odor complaints. The proposed project would not create objectionable odors affecting a substantial number of people during project construction or operation, and this impact would be less than significant. This topic will not be discussed in the EIR.

3.4 BIOLOGICAL RESOURCES

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

Argonaut Ecological Consulting conducted a Biological Resource Assessment[11] (BRA) to assess potential impacts of the proposed project on biological resources. The following methodology was utilized to assess the biological study area of the proposed project:

- **Data and Literature Review:** Documents and sources of information used to prepare this evaluation include the following:
    - United States Department of Agriculture, Natural Resources Conservation Service, Soil Survey of Fresno Area (Soils Mapper)
    - Aerial photography (Google Earth®, Bing®, and historic aerials)
    - California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB/RareFind – Recent version with updates)

[11] Argonaut Ecological Consulting. 2022. Biological Resources Assessment – Tentative Tract 6343 and City of Clovis Annexation Area. September 26.

- CDFW Open Data Portal, ArcGIS GeoService
- United States Fish and Wildlife Service (USFWS), National Wetland Inventory Map
- USFWS Information for Planning and Consultation (IPaC).
- United States Geological Survey (USGS), Historical Topographic Map, Clovis and Friant Quadrangles, 1919, University of Texas, Austin, Perry-Castañeda Map Collection

Prior to review of the project site, the CNDDB/RareFind and the USFWS IPaC were consulted to determine the species potentially present within the biological study area based on location.

- **Aerial Photography and Wetland Mapping:** Historical aerial photographs dating from the 1980s of the biological study area were reviewed to identify site features and determine land use changes over time. Wetland mapping and aerial photographs were also reviewed to determine if the biological study area recently supported wetlands.

- **Field Survey:** A field survey was conducted on the project site on August 6 and 7, 2022. The project site was walked, and habitat features mapped. Review of the annexation area of the proposed project included a combination of observation from public roads, and limited foot surveys of accessible areas. Soils, vegetation, and drainage patterns within the biological study area were inspected to determine the habitat present and suitability for species of concern.

3.4.1 Impact Analysis

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation Incorporated. The proposed project would result in the construction of a 590-lot residential development for single-family residences in the approximately 71.54-acre site located in the Heritage Grove area.

The project site is currently dominated by ruderal species and by nonnative grassland previously used for cattle grazing. No special-status plant species are expected to occur within the project site or to be adversely affected by the proposed project. While no special-status animal species (or signs of such species) were observed on site during the August 2022 survey, eight existing trees surrounding the existing residential unit within the project site could provide suitable nesting habitat for a variety of birds, including Swainson's hawk (*Buteo swainsoni*). Additionally, there is potential for the western burrowing owl (*Athene cunicularia*) to nest in old pipelines around the existing residential unit or along the Enterprise Canal. No suitable habitat for any other special-status species occurs in the project site. Potentially significant direct and indirect impacts, including mortality, harassment, or other forms of incidental take, could occur during proposed removal of existing trees and the exiting residential unit in the project site and due to site disturbance associated with construction activities. Mitigation Measures BIO-1 through BIO-4, outlined below,

would reduce the impact of the proposed project on special-status species to less than significant. As such, the proposed project would not 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 CDFW or USFWS. The impact would be less than significant with mitigation, and this topic will not be discussed in the EIR.

Mitigation Measure BIO-1 **Nesting Bird Surveys and Active Nest Avoidance.** Any initial ground disturbance or tree pruning, or removal should take place outside of the active nesting bird season (i.e., February 1–September 30), when feasible, to avoid impacts to nesting birds protected under the California Fish and Game Code and Migratory Bird Treaty Act. Should phased construction require tree removal or initial ground disturbance to ruderal areas, a qualified biologist shall conduct a nesting bird survey no more than 15 days prior to each phase of clearing activities. If nesting birds are discovered during preconstruction surveys, the biologist shall identify an appropriate buffer where no clearing, grading, or construction activities with potential to have direct or indirect impacts on the nesting bird(s) are allowed to take place until after the nest is no longer active (e.g., the young birds have fledged), or as otherwise determined by the qualified biologist.

Mitigation Measure BIO-2 **Conduct Surveys for Swainson's Hawk Nests and Implement Avoidance and Minimization Measures.** The qualified biologist will conduct surveys for Swainson's hawk (*Buteo swainsoni*) during the nesting season (February 1 to August 31) along the existing trees within the project site. No sooner than 30 days prior to any ground disturbing activity, the qualified biologist will conduct pre-construction surveys of nests identified during the earlier surveys to determine if any are occupied. The initial nesting season surveys and subsequent preconstruction nest surveys will follow the protocols set out in the Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (Swainson's Hawk Technical Advisory Committee [SHTAC] 2000) or guidance current at the time of project implementation. Available database records will be used to support the survey.

Any active Swainson's hawk nests (defined as a nest used one or more times in the last 5 years) found within the existing trees on site during the nesting season will be monitored daily by the qualified biologist to assess whether the nest is occupied. If the nest is occupied, the qualified biologist will establish no-work buffers following California Department of Fish and Game's 1994 Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (*Buteo swainsoni*) in the Central Valley of California, and the status

of the nest will be monitored until the young fledge or for the length of construction activities, whichever occurs first. Adjustments to the buffer(s) may be made in consultation with the California Department of Fish and Wildlife (CDFW).

If an occupied Swainson's hawk nest site is to be removed, an incidental take permit under the California Endangered Species Act (CESA) will be obtained, and impacts will be minimized through permitting with the CDFW and fully mitigated.

Mitigation Measure BIO-3 **Conduct Pre-construction Clearance Surveys for Burrowing Owl.** A pre-construction clearance survey will be conducted in the vicinity of the existing residence on site, as well as within the disturbed annual grassland and embankments of the Enterprise No. 109 Canal by a qualified biologist for burrowing owl (*Athene cunicularia*) no more than 30 calendar days prior to initiation of ground disturbance activities. All surveys will follow the California Department of Fish and Game 2012 Staff Report on Burrowing Owl Mitigation methodology, or guidance current at the time of project implementation, and results shall be delivered to CDFW and the City of Clovis. If the survey results find an active burrow, the Project Applicant must coordinate with the CDFW to obtain applicable agency approval/permit prior to any ground disturbance activities on the site.

Mitigation Measure BIO-4 **Passive Relocation Measures for Burrowing Owl.** If burrowing owl (*Athene cunicularia*) are detected during the pre-construction surveys, occupied burrows will not be disturbed during the nesting season (February 1 through August 31 for owls and other raptors). The non-disturbance buffer will include a minimum 330-foot (100-meter) buffer zone around any occupied burrow unless a qualified biologist approved by the CDFW verifies through non-invasive methods that either (1) burrowing owls have not begun egg laying and incubation, or (2) juveniles from the occupied burrows are foraging independently and are capable of independent survival. The sizes of individual buffers may be modified through coordination with the CDFW based on site-specific conditions and existing disturbance levels. During the non-nesting season or if the qualified biologist determines either (1) or (2) above, the Project Applicant will coordinate with the CDFW to construct artificial burrows and passively relocate the owl(s). Passive relocation is defined as encouraging owls to move from occupied burrows to alternate natural or artificial burrows that are beyond approximately 160 feet (50 meters) from the impact zone and that are within or contiguous to a minimum of 6.5 acres of foraging

habitat for each pair of relocated owls (California Burrowing Owl Consortium 1993).

If passive relocation is required, a qualified biologist shall prepare a Burrowing Owl Exclusion and Mitigation Plan and Mitigation Land Management Plan in accordance with the CDFW 2012 Staff Report on Burrowing Owl Mitigation and for review by CDFW prior to passive relocation activities. Owls shall be excluded from burrows in the immediate impact zone and within an approximately 160-foot (50-meter) buffer zone by installing one-way doors in burrow entrances. One-way doors shall be left in place for 48 hours to ensure owls have left the burrow before excavation. One alternate natural or artificial burrow shall be provided for each burrow that will be excavated in the project impact zone. The project site shall be monitored daily for 1 week to confirm owl use of alternate burrows before excavating burrows in the immediate impact zone. Whenever possible, burrows shall be excavated using hand tools and refilled to prevent reoccupation. Sections of flexible plastic pipe or burlap bags shall be inserted into the tunnels.

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, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. No riparian habitat or other sensitive natural communities have been identified within the project site. The project site is disturbed from past agricultural activities, and mainly contains ruderal vegetation and nonnative grassland. As such, the proposed project would not have substantial adverse effects on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS, and the impact would be less than significant. This topic will not be discussed in the EIR.

c. Would the project 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?

Less Than Significant with Mitigation Incorporated. The proposed project would result in the construction of a 590-lot residential development for single-family residences in an approximately 71.54-acre site in the Heritage Grove area.

The main aquatic feature in the vicinity of the project site is Enterprise No. 109 Canal (Enterprise Canal), an irrigation canal managed by the Fresno Irrigation District. Enterprise No. 109 Canal does not meet the current definition of a jurisdictional water of the United States and does not meet the wetland criteria wetland criteria outlined in the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State, which excludes agricultural ditches with ephemeral flow that are not a relocated water of the state or excavated in a water of the state.

Nevertheless, the Enterprise No. 109 Canal may fall within the jurisdiction of CDFW under Section 1602 of the California Fish and Game Code and the Regional Water Quality Control Board (RWQCB) under the California Water Code (e.g., the Porter-Cologne Water Quality Control Act). Furthermore, given the recent substantial changes in operable definitions that have occurred and may continue to occur, and considering the regulatory revisions and potential court actions, it is not possible to definitively predict the regulations that will be in place at the time of a particular jurisdictional determination or permit action by the United States Army Corps of Engineers (USACE). Under currently effective Clean Water Act regulations and guidance, the USACE reserves the right to regulate certain resources on a case-by-case basis. Therefore, Regulatory Compliance Measure BIO-1 is recommended. Implementation of this measure would reduce potential impacts to protected wetlands to less than significant.

As such, the proposed project would not have a substantial adverse effect on state or federally protected wetlands, and the impact would be less than significant with mitigation. This topic will not be discussed in the EIR.

Regulatory Compliance Measure BIO-1

Agency Coordination for Enterprise No. 109 Canal. Prior to any modifications to Enterprise No. 109 Canal, it is recommended to consult with the United States Army Corps of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB) to verify the feature's jurisdictional status and obtain applicable permit(s) and/or authorization(s). If direct modifications to the canal are proposed, a notification of streambed alteration shall be submitted to the CDFW in accordance with Section 1602 of the California Fish and Game Code. Unless categorically excluded under effective definitions or existing documentation confirms that no permit is needed, the Central Valley RWQCB and Sacramento District of the USACE shall be consulted regarding potential permitting needs under the California Water Code and federal Clean Water Act, respectively, associated with the proposed Enterprise No. 109 Canal modifications.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. The project site is disturbed from past agricultural activities, and mainly contains ruderal vegetation and nonnative grassland. Based on field observations and the location of the project site, there are no indications that the project site functions as a wildlife movement corridor, or an important stopover point for migratory species. The wildlife species that occur in the vicinity of the project site are adapted to the urban-wildland interface. The noise,

vibration, light, dust, or human disturbance within construction areas would only temporarily deter wildlife from using areas in the immediate vicinity of construction activities. The proposed project would not place any permanent barriers within any known wildlife movement corridors or interfere with habitat connectivity.

Existing trees on site could provide limited nesting habitat to native and migratory bird species, including Swainson's hawk. Furthermore, there is limited potential for Burrowing owls nesting in the vicinity of the existing residential unit onsite, as well as the vicinity of Enterprise No. 109 Canal. Breeding-season disturbance that causes nest abandonment and/or loss of reproductive effort is considered a form of take by the CDFW. Implementation of Mitigation Measures BIO-1 through BIO-4 would ensure that take of nesting migratory bird species, as well as of special-status species such as Swainson's hawk and burrowing owl, is avoided.

As such, the proposed project would not 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. The impact would be less than significant. This topic will not be discussed in the EIR.

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 Clovis Development Code includes 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. The project would be required to comply with the tree protection ordinance; therefore, the impact would be less than significant.

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 PG&E San Joaquin Valley Operation and Maintenance (O&M) Habitat Conservation Plan (HCP) was approved in 2007 and covers portions of nine counties, including Fresno County. This HCP covers PG&E activities that occur as a result of ongoing O&M that would have an adverse impact on any of the 65 covered species and provides incidental take coverage from the USFWS and CDFW. The project site is not located within the covered area of any approved or draft HCP, Natural Communities Conservation Plan (NCCP), or other adopted local, regional or State HCP. Therefore, the proposed project would not conflict with the provisions of the PG&E HCP, and the proposed project would have no impact. This topic will not be discussed in the EIR.

3.5 CULTURAL RESOURCES

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

Peak & Associates, Inc. prepared a Cultural Resource Assessment (CRA)[12] for the proposed project to assess potential impacts to cultural resources. The following discussion summarizes the methodology and results of the study:

- **Southern San Joaquin Valley Information Center:** A record search of the study area for the proposed project and a 0.25-mile search radius was conducted on through the Southern San Joaquin Valley Information Center (SSJVIC) of the California Historical Resources Information System (CHRIS) on September 6, 2022 (SSJVIC Records Search File No. 22-334).

  The record search results indicated that no portion of the project site has ever been previously surveyed for cultural resources. Two resources were identified within the study area: a waste disposal site (P-10-006461) found during excavation for a utility pole in the northeast corner of the annexation area in 2015, and the Enterprise Canal, recorded as P-FRE-3564-H. Within the 0.25-mile radius search, six historic period resources have been recorded.

- **Field Survey:** On September 14, 2022, and September 15, 2022, Peak & Associates, Inc. staff conduced a field survey of the project site. The project site was walked on its entirety and surveyed.

- **Results:** No features or artifacts of historical or prehistoric nature were observed in the project site during the field survey. The existing residential unit onsite is less than 50 years old and would not be considered a historical resource.

3.5.1 Impact Analysis

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

Less Than Significant with Mitigation Incorporated. A historical resource defined by CEQA includes one or more of the following criteria: (1) the resource is listed, or found eligible for listing in, the California Register of Historical Resources (California Register); (2) listed in a local register of

[12] Peak & Associates, Inc. 2022. Cultural Resource Assessment for the Tentative Tract Map 6343 and City of Clovis Annexation Area, County of Fresno, California. September 21.

historical resources as defined by Public Resources Code (PRC) Section 5020.1(k); (3) identified as significant in a historical resources survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by the project's lead agency (PRC Section 21084.1; *CEQA Guidelines* Section 15064.5(a)). Under CEQA, historical resources include built-environment resources and archaeological sites.

The proposed project would result in the construction of a 590-lot residential development for single-family residences. According to the CRA for the project, no historical resources were identified within the project site during the record search or field survey. However, development of previously undeveloped land in the City could result in the discovery of previously unknown historical resources.

To reduce potential impacts on potentially undiscovered historical resources in the project site, Mitigation Measure CUL-1 shall be implemented. This mitigation measure would reduce potential impacts to undiscovered resources to a less than significant level by consulting with a qualified historical resources specialist and implementing applicable mitigation measures to protect resources found during project construction. This topic will not be discussed in the EIR.

Mitigation Measure CUL-1

Consultation with Qualified Historical Specialist for Resources Found During Project Construction. If previously unknown resources are encountered before or during grading activities, construction shall stop within 50 feet of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study.

The qualified historical resources specialist shall make recommendations to the City of Clovis on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the *CEQA Guidelines*.

If the resources are determined to be unique archeological resources as defined under Section 15064.5(c)(1) of the *CEQA Guidelines*, measures shall be identified by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of green space, parks, or open space in undeveloped areas of the project site, or data recovery excavations of the finds.

No further grading shall occur in the area of the discovery until the Lead Agency approves the protection measures. Any historical artifacts recovered as a result of mitigation shall be provided to a City of Clovis-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

A report of findings shall also be submitted to the Southern San Joaquin Valley Information Center .

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

Less Than Significant with Mitigation Incorporated. Pursuant to *CEQA Guidelines* Section 15064.5(c)(1), "When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource..." Those archaeological sites that do not qualify as historical resources shall be assessed to determine if they qualify as "unique archaeological resources" pursuant to California PRC Section 21083.2. Archaeological cultural resources identified during project construction shall be treated by the City in consultation with a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and in accordance with Mitigation Measure CUL-1 as identified above in Section 3.5.a. With implementation of these measures, impacts to archaeological resources would be less than significant. This topic will not be discussed in the EIR.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

Less Than Significant with Mitigation Incorporated. Disturbance of human remains interred outside of formal cemeteries would result in a significant impact. If human remains are identified during project construction, Section 7050.5 of the California Health and Safety Code and PRC Section 5097.98 shall apply, as appropriate. Furthermore, implementation of Mitigation Measure CUL-2 would ensure compliance with applicable laws and regulations pertaining treatment and disposition human remains, reducing potential impacts on unknown human remains to a less than significant level. This topic will not be included in the EIR.

Mitigation Measure CUL-2

In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains.

Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the Project Applicant shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further

development activity until the Project Applicant has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The Project Applicant shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

3.6 ENERGY

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

3.6.1 Impact Analysis

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 proposed project would be constructed using energy-efficient modern building materials and construction practices, and the proposed project also would use new modern appliances and equipment, in accordance with the Appliance Efficiency Regulations (Title 20, California Code of Regulations [CCR] Sections 1601 through 1608). The expected energy consumption during construction and operation of the proposed project would be consistent with typical usage rates for residential uses in the Clovis; however, energy consumption is largely a function of personal choice and the physical structure and layout of buildings. It can be assumed that implementation of the proposed project would result in additional energy demand in Clovis. The proposed project would be required to comply with the City's energy efficiency policies, including Policies 3.5, 3.6, and 3.7 from the Open Space and Conservation Element of the General Plan as follows:

> **Policy 3.5: Energy and Water Conservation.** Encourage new development and substantial rehabilitation projects to exceed energy and water conservation and reduction standards set in the California Building Code.
>
> **Policy 3.6: Renewable Energy.** Promote the use of renewable and sustainable energy sources to serve public and private sector development.
>
> **Policy 3.7: Construction and design.** Encourage new construction to incorporate energy efficient building and site design strategies.

Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. As such, the proposed project would have a less than significant impact. This topic will not be discussed in the EIR.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. As discussed in a) above, the proposed project would be required to comply with the Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608) and with General Plan policies for energy efficiency and conservation. The proposed project would also be required to implement the California Green Building Standards Code (CALGreen Code) (CCR Title 24, Part 11) and the California Energy Code (CCR Title 24, Part 6), which include provisions related to insulation and design aimed at minimizing energy consumption. Therefore, the proposed project would comply with State and local policies plan for renewable energy or energy efficiency, and the impact would be less than significant. This topic will not be discussed in the EIR.

3.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

3.7.1 Impact Analysis

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? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault ruptures are generally expected to occur along active fault traces that have exhibited signs of recent geological movement (i.e., within the past 11,000 years). Alquist-Priolo Earthquake Fault Zones delineate areas around active faults with potential surface fault rupture hazards that would require specific geological investigations prior to approval of certain kinds of development within the delineated area. The project site is not located within an Alquist-Priolo Earthquake Fault Zone. In addition, no known active or potentially active faults or fault traces are located in the vicinity of the project site. The closest active faults to the project site are the Nunez Fault, located approximately 60 miles southwest of the project site and the Ortigalita Fault, located approximately 66 miles southwest of the

project site. Due to the distance of these known faults, no people or structures would be exposed to potential substantial adverse effects, including the risk of loss, injury, or death from the rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. Therefore, potential impacts related to fault rupture would be less than significant. This topic will not be discussed in the EIR.

ii. Strong seismic ground shaking?

Less Than Significant Impact. While Clovis is not located within an Alquist-Priolo Earthquake hazard zone, some ground shaking may occur within the City Planning Area depending on the amount of energy released from a nearby fault, or the magnitude of the earthquake. The proposed project would be required to conform to California Building Code (CCR Title 24) seismic safety standards, which take multiple factors into account, such as occupancy type, soil type, and ground motion with a specified probability at the project site. Compliance with the California Building Code would ensure that geotechnical design of the proposed project would reduce potential impacts related to seismic ground shaking to less than significant. This topic will not be discussed in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction is a phenomenon primarily associated with saturated soil layers located close to the ground surface. During ground shaking, these soils lose strength and acquire "mobility" sufficient to permit both horizontal and vertical movements. Soils that are most susceptible to liquefaction are clean, loose, uniformly graded, saturated, fine-grained sands that lie relatively close to the ground surface. However, loose sands that contain a significant amount of fines (silt and clay) may also liquefy. Liquefaction and lateral spreading potential in Fresno County and Clovis is considered very low due to the nature of the underlying soils and history of low ground-shaking potential in the region. Furthermore, compliance with the California Building Code would ensure potential impacts associated with seismic-related ground failure would be less than significant. This topic will not be discussed in the EIR.

iv. Landslides?

Less Than Significant Impact. Landslides typically occur in areas that experience ground shaking, are typically wet and/or have steep slopes. The proposed project is located in Clovis, which is an area that consists of mostly flat topography within the Central Valley and has low ground-shaking potential. Additionally, the project site is not located next to any hills, rivers, creeks or unlined canals that could increase the risk of landslides. Therefore, the potential for the proposed project to expose people or structures to risk as a result of landslides would be less than significant. This topic will not be discussed in the EIR.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Grading and earthmoving during project construction has the potential to result in erosion and loss of topsoil. Exposed soils could be entrained in stormwater

runoff and transported off the project site. However, this impact would be reduced to a less-than-significant level through compliance with water quality control measures, which include preparation of a Stormwater Pollution Prevention Plan (SWPPP) (refer to Section 3.10, Hydrology and Water Quality). Although designed primarily to protect stormwater quality, the SWPPP would incorporate Best Management Practices (BMPs) to minimize erosion during construction. Additional details regarding the SWPPP are provided in Section 3.10, Hydrology and Water Quality, of this Initial Study. This impact would be less than significant. This topic will not be discussed in the EIR.

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. As described in discussion a) in this section, soils on the project site would not be subject to liquefaction, lateral spreading, or landslides. Additionally, the proposed project would be required to conform with the California Building Code, which would reduce risks related to unstable soils. Therefore, the proposed project would have a less than significant impact related to unstable soils. This topic will not be discussed in the EIR.

d. Would the project 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?

Less Than Significant Impact. Expansive soils are characterized by the potential for shrinking and swelling as the moisture content of the soil decreases and increases, respectively. Shrink-swell potential is influenced by the amount and type of clay minerals present and can be measured by the percent change of the soil volume. The project site contains Exeter sandy loam, Tujunga loamy sand, Atwater sandy loam, and Ramona sandy loam, soils which have a medium to low shrink-swell potential.[13] Compliance with California Building Code requirements would ensure the implementation of design features that would reduce potential impacts related to expansive soils to a less than significant level. As such, the risk of expansive soil affecting the proposed project is considered low and would represent a less than significant impact. This topic will not be discussed in the EIR.

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

No Impact. The City's Public Utilities Department currently manages the City's sewer system and wastewater treatment facilities. Wastewater from the City's collection system is treated at the Clovis Water Reuse Facility and the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF). Development of the proposed project would not involve the use of septic tanks or alternative wastewater disposal systems. The proposed project would be required to pay development fees and fund the construction or expansion of wastewater infrastructure, as applicable, to ensure that the public sewer system would serve the project site. Therefore, the proposed project would have no

[13] Natural Resources Conservation Service. n.d. Web Soil Survey. Website: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx (accessed April 14, 2022).

impact related to septic tanks or alternative wastewater disposal systems. This topic will not be discussed in the EIR.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. Paleontological resources are afforded protection under *CEQA Guidelines*, Appendix G. The *CEQA Guidelines* indicate that a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site, or a unique geologic feature. PRC Section 5097.5 also specifies that the unauthorized removal or damage of paleontological remains is a misdemeanor. The California Penal Code Section 622.5 also sets penalties for removal or damage of paleontological resources.

The project site has been partially developed and used for agricultural production. In addition, there have been no known discovery of occurrences of paleontological resources in the immediately surrounding areas. Although the project site has been previously disturbed, it is possible that paleontological resources could be inadvertently or accidentally discovered within the project site during construction activities. Mitigation Measure GEO-1 would serve to protect the accidental discovery of paleontological resources. As such, a less than significant impact with mitigation would occur. This topic will not be discussed in the EIR.

Mitigation Measure GEO-1 If any potentially significant paleontological resources are discovered during grading activities, all construction activities shall stop within 50 feet of the find and a certified professional paleontologist shall provide recommendations and mitigation measures to protect the resource.

If a potentially significant resource is encountered, then the qualified professional paleontologist, the City of Clovis, and the Project Applicant 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 City of Clovis as verification that the provisions for managing unanticipated discoveries have been met.

3.8 GREENHOUSE GAS EMISSIONS

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

3.8.1 Impact Analysis

Greenhouse gases (GHGs) are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are:

- Carbon dioxide (CO_2)
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to carbon dioxide (CO_2), which is the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e).

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

Potentially Significant Impact. Construction activities, such as site preparation, site grading, on-site heavy-duty construction vehicles, equipment hauling materials to and from the project site and

motor vehicles transporting the construction crew would produce GHGs. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Long-term operation of the proposed project would generate GHG emissions from mobile and stationary sources. Mobile-source emissions of GHG would include vehicle-related emissions associated with the private vehicles owned by residents and employees of the project site. Stationary emissions of GHG would include electricity and natural gas consumption from residences at the project site.

The EIR will provide further analysis of the proposed project's GHG emissions.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As discussed above, the project has the potential to emit GHGs. As such, the EIR will include further evaluation of project-related emissions and associated emission reduction strategies to determine whether the proposed project conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☒	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

3.9.1 Impact Analysis

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. Construction activities associated with the proposed project would involve the use of limited amounts of potentially hazardous materials, including but not limited to, solvents, paints, fuels, oils, and transmission fluids. However, all materials used during construction would be contained, stored, and handled in compliance with applicable standards and regulations established by the California Department of Toxic Substances Control (DTSC), the EPA, and the Occupational Safety and Health Administration (OSHA). No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials or emitting significant amounts of hazardous substances would occur within the project site. All storage, handling, and disposal of hazardous materials during project construction and operation would comply with applicable standards and regulations, including Policies 1.4, 2.1, 2.3, and 2.4 from the Environmental Safety Element of the General Plan:

Policy 1.4: Facilities that use hazardous materials. Prohibit facilities using, storing, or otherwise involved with hazardous or toxic materials to be located in the 100-year flood zone unless all standards of elevation, flood proofing, and storage have been implemented.

Policy 2.1: Safe storage and maintenance. The use and storage of hazardous materials shall comply with applicable federal, state, and local laws to prevent and mitigate hazardous materials releases.

Policy 2.3: Truck routes for hazardous materials. Maintain designated truck routes for the transportation of hazardous materials through the City. Discourage routes that pass through residential neighborhoods to the maximum extent feasible.

Policy 2.4: Hazardous materials response team. Maintain a Type 1 hazardous materials response team serving the City of Clovis.

As a result, the proposed project would not create significant hazards to the public or environment through the transport, use or disposal of hazardous materials, and a less than significant impact would occur. This topic will not be included in the EIR.

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 a) above. The proposed project would not use substantial amounts hazardous materials which release would result in a significant hazard to the public or the environment. Additionally, the proposed project would also comply, as applicable, with General Plan Policies 1.4, 2.1, 2.3 and 2.4 from the Environmental Safety Element, which require compliance with local, State and federal standards and procedures for the handling, use, transport and disposal of hazardous materials. This impact would be less than significant. This topic will not be included in the EIR.

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. The closest existing schools to the project site are Woods Elementary School, located approximately 0.75 mile south of the project site, and Buchanan High School, located approximately 1.08 miles southeast of the project site. As previously stated, the proposed project would not result in the use or emission of substantial quantities of hazardous materials that would pose a human or environmental health risk. In addition, all hazardous materials within the project site would be handled, stored, and disposed of in accordance with applicable standards and regulations. Therefore, because the proposed project would not result in the emission of hazardous materials or acutely hazardous substances in the vicinity of a school, a less than significant impact would occur. This topic will not be included in the EIR.

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?

Less Than Significant Impact. According to the DTSC EnviroStor database,[14] the project site is not located on a federal superfund site, State response site, voluntary cleanup site, school cleanup site, evaluation site, school investigation site, military evaluation site, tiered permit site, or corrective action site. Additionally, the project site is not included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.[15] Therefore, the proposed project would not create a significant hazard to the public, and a less-than-significant impact would occur. This topic will not be included in the EIR.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 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?

Less Than Significant Impact. The nearest airports to the project site include the Fresno Yosemite International Airport, located approximately 6.5 miles southwest of the project site, Fresno Chandler Executive Airport, located approximately 11.7 miles southwest of the project site, and the Sierra Sky Airport, located approximately 9.6 miles southwest of the project site. The nearest medical center helipads (HP) to the project site include the Clovis Community Hospital HP located approximately 3.34 miles southeast of the project site, the Saint Agnes Medical Center HP, located approximately 4.2 miles southwest of the project site, and the Valley Children's Hospital HP located approximately 5.33 miles west of the project site.[16] Due to the distance between the project site and local airports and helipads, operations at these locations are not expected to pose a safety hazard for people residing in the project site. Therefore, the proposed project would not expose persons to airport-related hazards, and the potential impact would be less than significant. This topic will not be included in the EIR.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The California Emergency Services Act requires cities to prepare and maintain an Emergency Plan for natural, manmade, or war-caused emergencies that result in conditions of disaster or in extreme peril to life. The Clovis Fire Department maintains the City's Emergency Operations Plan (EOP). The proposed project would include the construction of 590 new single-family residential units within the project site, as well as landscaped, recreational, and utility areas. The proposed project would also result in the construction of extensions of North Baron

[14] California Department of Toxic Substances Control. 2007. EnviroStor. Website: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=clovis (accessed April 14, 2022).

[15] California Environmental Protection Agency (CalEPA). 2018. Government Code Section 65962.5(a) Hazardous Waste and Substances Site List. Website: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/ (accessed April 14, 2022).

[16] California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Website: https://heliplates.dot.ca.gov/# (accessed April 14, 2022).

Avenue, Perrin Avenue, and Hammel Avenue to facilitate access to, and circulation within, the project site.

The proposed improvements to North Baron Avenue, Perrin Avenue, and Hammel Avenue are not expected to block the circulation of emergency response services in the vicinity of the project site or introduce elements that would conflict with the operations of the City's EOP. After construction, the proposed extensions to North Baron Avenue, Perrin Avenue, and Hammel Avenue would improve access of emergency response vehicles to the project area and evacuation from the project area. Therefore, the proposed project would not interfere with emergency evacuation plans in Clovis, and this impact would be less than significant. This topic will not be included in the EIR.

g. Would the project 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 project site is located in an area mapped by the California Department of Forestry and Fire Protection (CAL FIRE) as Local Responsibility Area (LRA) Unzoned, indicating that the area is urbanized and not susceptible to wildland conflagrations, and is not located within a very high fire hazard severity zone (VHFHSZ).[17] However, the project site is in the vicinity of a moderate fire hazard zone. As such, implementation of the proposed project could expose people and/or structures to fire hazard by development near a moderate fire hazard severity zone. In compliance with the General Plan EIR, projects built or developed within a fire hazard severity zone would be required to comply with Chapter 7A of the California Building Code. Any project developed or redeveloped surrounded by or next to forest, brush, grass, or other flammable vegetation would also be mandated to comply with requirements regarding hazardous vegetation, defensible space, and fuel management in California PRC Sections 4291 et seq. and in Sections 4906 and 4907 of the California Fire Code (CFC). Implementation of these regulations would reduce potential impacts associated with wildland fires to a less-than-significant level. This topic will not be included in the EIR.

[17] California Department of Forestry and Fire Protection (CAL FIRE). 2007. Fresno County Fire Hazard Severity Zones in LRA. Website: https://osfm.fire.ca.gov/media/6673/fhszl06_1_map10.pdf (accessed April 14, 2022).

3.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
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 off site;	☐	☐	☒	☐
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?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.10.1 Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The State Water Resources Control Board (SWRCB) and nine RWQCBs regulate the water quality of surface water and groundwater throughout California. The proposed project is within the jurisdiction of the Central Valley RWQCB.

Pollutants of concern during construction include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During project construction, there would be an increased potential to expose soils to wind and water erosion, which could result in temporary minimal increases in sediment load in nearby water bodies.

In compliance with the General Plan, any development project disturbing one or more acres of soil must obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Construction activities subject to the Construction General Permit includes clearing, grading, and other ground-disturbing

activities such as stockpiling or excavation. The Construction General Permit requires development and implementation of a SWPPP.

A SWPPP includes features designed to eliminate contact of rainfall and stormwater runoff with sources of pollution that occur on construction sites, the main source being soil erosion resulting from unstabilized soils coming in contact with water and wind. These features are known as BMPs. Common BMPs to limit pollution in stormwater runoff from construction sites include maintaining or creating drainages to convey and direct surface runoff away from bare areas and installing physical barriers such as berms, silt fencing, waddles, straw bales, and gabions. Consistency with the Construction General Permit, including the SWPPP and BMPs, would reduce project construction impacts on water quality to less than significant levels.

To address long-term impacts to groundwater quality, the proposed project would comply with the Fresno-Clovis Storm Water Quality Management Program (SWQMP)[18], which requires the implementation of BMPs to manage urban stormwater runoff in the Fresno Metropolitan Area. These BMPs require the implementation of site drainage designs and post-construction measures that prevent stormwater pollution, as well as compliance with City of Clovis standards to improve stormwater quality. Compliance with this program would reduce potential impacts to groundwater quality from the proposed project. The Project Applicant would be required to pay Local Drainage Fees to fund drainage improvements pursuant to the FMFCD Master Plan and the SWQMP. Therefore, the proposed project would not violate any water quality standards, waste discharge requirements, or substantially degrade surface or groundwater quality, and the impact would be less than significant. This topic will not be included in the EIR.

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. Water supply, and water and wastewater circulation services for the proposed project would be provided by the City of Clovis through the Department of Public Utilities. The City of Clovis relies upon groundwater, surface water, and recycled water for its water supply.

The City extracts groundwater from the Kings Subbasin, an unadjudicated basin with a status of critically overdrafted. The proposed project would construct a 590-lot residential development in a previously undeveloped site. The proposed project would result in an increase of impervious surfaces in the currently undeveloped project site. However, the project would not require groundwater pumping for project operations. As previously discussed, the City extracts groundwater from the Kings Subbasin through a well system containing 36 active wells and one standby well with a total capacity of approximately 37,690 gallons per minute (gpm) with another 4,750 gpm of additional capacity planned in the next few years. According to the City's 2020 Urban Water

[18] Fresno Metropolitan Flood Control District (FMFCD). 2020. Fresno-Clovis Storm Water Quality Management Program: FY 2019-20 Annual Report. October 1. Website: http://www.fresnofloodcontrol.org/wp-content/uploads/2020/09/2019-20-Annual-Report-FINAL.pdf (accessed December 6, 2022).

Management Plan[19], the City conducted 5,316 acre-feet (AF) of intentional recharge activities at various basins, creeks, and landscape areas throughout the City's service area. Stormwater throughout the City is collected in FMFCD basins, where collected stormwater is allowed to percolate into the soil as groundwater recharge. The FMFCD allows the City to utilize 17 stormwater basins throughout the City's service area for recharge purposes. The FMFCD urban stormwater drainage system would provide groundwater infiltration for runoff from developed land uses in detention basins in the City's drainage system service area. As Clovis continues to grow, the City intends to expand its surface water supply use, recycled water use, and to continue intentional groundwater recharge efforts to relieve pressure on the groundwater aquifer. The proposed project would aid groundwater recharge in the Kings Subbasin through compliance with the Urban Water Management Plan (UWMP) and construction of surface and subsurface drainage infrastructure, per design requirements of the City and FMFCD, along North Baron Avenue, Perrin Avenue, and Hammel Avenue as well as along internal roadways in the project site to direct stormwater towards FMFCD Basin BY, which is located adjacent to the project site's eastern boundary. In addition, a 1,300-foot-long, 26-foot-wide drainage channel would be constructed along the north side of the Perrin Avenue extension to direct stormwater flows west from the project site towards drainage infrastructure along the Enterprise Canal. As such, the proposed project would not interfere with groundwater recharge in the Kings Subbasin, and impacts would be less than significant.

In addition to the groundwater supplies, the City also has access to surface water through several different contracts, all of which are delivered to the City by the Fresno Irrigation District (FID). The various surface water supplies are from the Kings River and Central Valley Project (Class II supplies, which are less reliable than other surface water supplies). Lands located within the Kings River service area are generally entitled to an average annual allotment of approximately 2.24 acre-feet per year per acre (AFY/ac). According to a Water Infrastructure Investigation prepared for the proposed project, and included as Appendix B of this Initial Study, approximately 38.6 acres of the project site are located within the FID service area and 32.9 acres are located outside of the FID service area. The Water Infrastructure Investigation has determined that the proposed Medium Density Residential use of the project has a water demand of 3.3 AFY/ac, making annual water demand in the project site approximately 236 AFY. Because the water demand of the project is higher than the allocation of the FID, and the FID would only supply water for approximately 54 percent of the project site (approximately 86.5 AFY), the proposed project would require additional water supply from the City of Clovis. The proposed project would be required to pay applicable development fees to the City to fund acquisition of additional water supplies. After payment of applicable fees, the City would be able to provide sufficient water supply for the project.

As identified in the Water Supply Assessment, included as Appendix C of this Initial Study, the City will have sufficient water supplies to provide water to this project. As such, the proposed project would not substantially decrease water supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin. As a result, this project would result in a less-than-significant impact related to impeding the

[19] City of Clovis. 2021. Urban Water Management Plan 2020 Update. July 12. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf (accessed December 6, 2022).

sustainable groundwater management of the Kings Subbasin. This topic will not be included in the EIR.

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 or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on or off site;

Less Than Significant Impact. Ground-disturbing activities associated with construction of the proposed project would expose native soils that could be subject to the effects of wind and water erosion unless adequate measures are taken to limit the transport of soils in surface water from construction sites to downstream locations. As discussed under discussion a) in this section, the Project Applicant would be required to implement a SWPPP that would identify specific measures to address erosion and siltation resulting from grading and construction.

Stormwater collection and disposal, and flood control for the City of Fresno, City of Clovis, and the unincorporated areas within the City of Clovis SOI are provided by the FMFCD. Stormwater from the project site would be drained through surface and subsurface drainage infrastructure located along North Baron Avenue, Perrin Avenue, and Hammel Avenue, as well as along internal roadways in the project site, and redirected towards Basin BY, which is located adjacent to the project site's eastern boundary. Compliance with the FMFCD's SWQMP would require the implementation of BMPs that would manage the release of pollutants and sediments from the project site into stormwater, thus managing potential impacts resulting from erosion and saltation on the project site. Implementation of these measures would reduce potential impacts related to erosion and saltation to less than significant. This topic will not be included in the EIR.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Less Than Significant Impact. The proposed project would construct a 590-lot residential development in the project site. The project site is mainly undeveloped, and therefore, implementation of the proposed project would increase impervious surfaces at the project site that could increase surface runoff. Stormwater from the project site would be drained through surface and subsurface drainage infrastructure located along North Baron Avenue, Perrin Avenue, and Hammel Avenue as well as along internal roadways in the project site, and redirected towards Basin BY, located adjacent to the project site's eastern boundary. The Project Applicant would be required to pay drainage fees to the FMFCD to fund drainage facilities and address impacts related to increased amount of surface runoff resulting from development of the project site. The construction of stormwater facilities would handle surface runoff in a manner that would exceed the capacity of existing or planned drainage infrastructure in the vicinity. Therefore, the impact would be less than significant. This topic will not be included in the EIR.

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

Less Than Significant Impact. Please refer to discussions a) and c) i and ii in this section. The proposed project would result in an increase of impervious surfaces, which can contribute to surface runoff. However, implementation of a SWPPP and compliance with the City's SWQMP would ensure that the proposed project would not generate additional sources of polluted runoff. Additionally, the Project Applicant would be required to pay drainage fees to the FMFCD to address impacts related to increased amount of surface runoff resulting from the proposed project. The construction of proposed stormwater facilities would handle surface runoff in a manner that would exceed the capacity of existing or planned stormwater drainage systems in the vicinity. Therefore, the impact would be less than significant. This topic will not be included in the EIR.

iv. Impede or redirect flood flows?

Less Than Significant Impact. Sections of the project site are located within a 100-year flood hazard zone as mapped by the Federal Emergency Management Agency (FEMA).[20] The City of Clovis Municipal Code Section 8.12, Floodplain Management lists standards and design requirements for new construction and development within special flood zones. Policy 1.1 from the General Plan Environmental Safety Element also prohibits development within the 100-year flood zone unless adequate mitigation against flood hazards is provided. The proposed project would implement flood hazard mitigation required by the City's Municipal Code. Implementation of these requirements would ensure the proposed project does not impede or redirect flood flows, and the impact would be less than significant. This topic will not be included in the EIR.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Less Than Significant Impact. The project site is not located in tsunami or seiche zones. Parts of the proposed project are located within a 100-year flood zone but as discussed under discussion c) iv, the proposed project would implement standards and requirements of the City of Clovis Municipal Code to mitigate risks related to flood hazards. Refer to discussion a) in Section 3.9, Hazards and Hazardous Materials, regarding the use, transport and storage of hazardous materials for project construction and operation. As a result, the proposed project would not risk the release of pollutants due to project inundation, and a less than significant impact would occur. This topic will not be included in the EIR.

[20] Federal Emergency Management Agency (FEMA). 2020. FEMA Flood Map Service Center: Search By Address. Website: https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor (accessed April 14, 2022).

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 proposed project would comply with the City of Clovis UWMP,[21] which promotes programs and policies to manage water supplies, including groundwater, in Clovis. The proposed project would also comply with the SWQMP and a site-specific SWPPP that would ensure water quality control at the project site, as applicable. The proposed project would not conflict or obstruct implementation of a water quality control or sustainable groundwater management plan, and the impact would be less than significant. This topic will not be included in the EIR.

[21] City of Clovis. 2021. Urban Water Management Plan 2020 Update. July 12. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf (accessed December 6, 2022).

3.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

3.11.1 Impact Analysis

a. Would the project physically divide an established community?

No Impact. The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas.

The proposed project would include the construction of a 590-lot residential development for single-family residences. The development would include landscaped spaces, private recreation, private streets, private pedestrian, public park and public utility uses. The project site is surrounded by agricultural and single-family residential uses to the south, rural residential and agricultural uses to the east, agricultural and commercial uses to the west, and agricultural and rural residential uses to the north.

The proposed project would not construct features that would physically divide an established community or remove means of access that would impair mobility in a community. Therefore, the proposed project would have no impact. This topic will not be included in the EIR.

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 land use for the project site, according to the City of Clovis General Plan, is Medium Density Residential.[22] The project site is currently zoned within the Exclusive Agricultural Zoning District (AE-20) of Fresno County. The proposed zoning for the project site is within the Single-Family Planned Residential Development (R-1-PRD) District. The proposed project would require annexation to the City of Clovis and an annexation application would be required to be submitted to the Fresno LAFCo. The Project Applicant would also be required to pay required processing fees for the annexation process. After approval of annexation of the project site into the City of Clovis, the proposed project would be consistent with the City's land use plans.

[22] City of Clovis. 2014. General Plan and Development Code Update PEIR. Land Use Element. Figure LU-2: Land Use Diagram. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Figure-LU-2.pdf (accessed April 14, 2022).

Therefore, the proposed project would not conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and the impact would be less than significant. This topic will not be included in the EIR.

3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

3.12.1 Impact Analysis

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?

Less Than Significant Impact. The Mineral Resources section of the Clovis General Plan EIR indicates that entire City of Clovis Planning Area is mapped as Mineral Resource Zone 3 (MRZ-3), meaning that the significance of potential mineral deposits cannot be determined from available data. The nearest area designated MRZ-2, where significant mineral resources are known or very likely to be found, is the San Joaquin River Resource Area, located approximately 4.5 miles west of the project site. Furthermore, the General Plan EIR does not identify any known mineral resources sectors or mineral resource extraction operations within or in the vicinity of the project site.[23] Therefore, the proposed project would not result in the loss of any known mineral resources, and the impact would be less than significant. This topic will not be included in the EIR.

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?

Less Than Significant Impact. Please refer to the discussion for a). The proposed project would not result in the loss of availability of any known locally important mineral resource recovery sites. Therefore, the proposed project would have a less than significant impact. This topic will not be included in the EIR.

[23] City of Clovis. 2014. General Plan and Development Code Update PEIR. Mineral Resources. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-11-Mineral-Resources.pdf (accessed April 14, 2022).

3.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
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?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	☐	☐	☒	☐

3.13.1 Impact Analysis

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?

Potentially Significant Impact. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (L_{eq}) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq}, the Community Noise Equivalent Level (CNEL), and the day-night average level (L_{dn}) based on dBA.

CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and L_{dn} are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, the City of Clovis.

The City of Clovis addresses noise in the Environmental Safety Element of the General Plan and in the Municipal Code. The Environmental Safety Element provides goals and policies that work to protect residential and other noise-sensitive uses from exposure to harmful or annoying noise levels; to identify maximum acceptable noise levels compatible with various land use designations; and to develop a policy framework necessary to achieve and maintain a healthful noise environment. Applicable Environmental Safety Element policies include the following[24]:

> **Policy 3.1 Land use compatibility:** Approve development and require mitigation measures to ensure existing and future land use compatibility as shown in the Noise Level Exposure and Land Use Compatibility Matrix and the city's noise ordinance.
>
> **Policy 3.4 Acoustical study:** Require an acoustical study for proposed projects that have the potential to exceed acceptable noise thresholds or are exposed to existing or future noise levels in excess of the thresholds in the city's noise ordinance.
>
> **Policy 3.5 Site and building design:** Minimize noise impacts by requiring appropriate site, circulation, equipment, and building design, and sound walls, landscaping, and other buffers.
>
> **Policy 3.14 Control sound at the source:** Prioritize using noise mitigation measures to control sound at the source before buffers, soundwalls, and other perimeter measures.

In addition, the City of Clovis addresses construction noise in Section 9.22.080, Noise, of the Municipal Code. Section 9.22.080 (D) sets exterior noise standards as shown in Table 3.B and interior noise standards as shown in Table 3.C.

Section 5.27.604 states that construction noise is permitted by the City of Clovis provided that construction activities take place between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. However, between June 1 and September 15, construction may begin at 6:00 a.m. on weekdays.

[24] City of Clovis. 2014. General Plan and Development Code Update PEIR. Environmental Safety Element. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Clovis-General-Plan-2014.pdf (accessed April 21, 2022).

Table 3.B: City of Clovis Maximum Exterior Noise Standards

Noise Zone	Type of Land Use	Allowable Exterior Noise Level (15-Minute L_{eq}), dBA	
		Daytime (7:00 AM to 10:00 PM)	Nighttime (10:00 PM to 7:00 AM)
I	Single-, two- or multiple-family residential	55	50
II	Commercial	65	60
III	Residential portions of mixed-use properties	60	50
IV	Industrial or manufacturing	70	70

Source: City of Clovis Municipal Code
dBA = A-weighted decibel
L_{eq} = equivalent continuous sound level

Table 3.C: City of Clovis Maximum Interior Noise Standards

Noise Zone	Type of Land Use	Allowable Interior Noise Level (15-Minute L_{eq}), dBA	
		Daytime (7:00 AM to 10:00 PM)	Nighttime (10:00 PM to 7:00 AM)
I	Residential	45	40
II	Administrative/professional office	50	-
III	Residential portions of mixed-use properties	45	40

Source: City of Clovis Municipal Code
dBA = A-weighted decibel
L_{eq} = equivalent continuous sound level

Certain land uses are considered more sensitive to noise than others. Examples of these sensitive land uses include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The nearest noise-sensitive land uses located within the vicinity of the project site includes residential uses located directly adjacent to the project site's eastern boundary.

Short-Term (Construction) Noise Impacts. Project construction would result in short-term noise impacts on nearby sensitive receptors. Maximum construction noise would be short term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase (e.g., demolition, land clearing, grading, excavation, erection) of construction. The level and types of noise impacts that would occur during construction are described below.

Short-term noise impacts would occur during grading and site preparation activities. Table 3.D lists typical construction equipment noise levels (maximum instantaneous noise level [L_{max}]) recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, obtained from the Federal High Administration (FHWA) Roadway Construction Noise Model. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the vicinity of the project site but would no longer occur once construction of the proposed project is completed.

Table 3.D: Typical Construction Equipment Noise Levels

Equipment Description	Acoustical Usage Factor (%)	Maximum Noise Level (L_{max}) at 50 Feet[1]
Backhoes	40	80
Compactor (ground)	20	80
Compressor	40	80
Cranes	16	85
Dozers	40	85
Dump Trucks	40	84
Excavators	40	85
Flat Bed Trucks	40	84
Forklift	20	85
Front-end Loaders	40	80
Graders	40	85
Impact Pile Drivers	20	95
Jackhammers	20	85
Pick-up Truck	40	55
Pneumatic Tools	50	85
Pumps	50	77
Rock Drills	20	85
Rollers	20	85
Scrapers	40	85
Tractors	40	84
Welder	40	73

Source: Roadway Construction Noise Model (FHWA 2006).
Note: Noise levels reported in this table are rounded to the nearest whole number.
[1] Maximum noise levels were developed based on Spec 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.
FHWA = Federal Highway Administration
L_{max} = maximum instantaneous sound level

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the site, which would incrementally increase noise levels on roads leading to the site. As shown in Table 3.D, there would be a relatively high single-event noise exposure potential at a maximum level of 84 dBA L_{max} with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during grading and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 3.D lists maximum noise levels recommended for noise impact assessments for typical construction equipment, based on a distance of 50 feet between the equipment and a noise receptor.

Typical maximum noise levels range up to 87 dBA L_{max} at 50 feet during the noisiest construction phases. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

As discussed in Section 1.0, Project Description, the proposed project would be constructed in three Phases, over a period of 33 months, and each phase would include the construction and addition of buildings, working areas and equipment to increase the production capacity of the project site. The closest sensitive receptor to the proposed project includes residential uses located directly adjacent to the project site's eastern boundary.

As discussed above, construction noise is permitted by the City of Clovis provided that construction activities take place between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. In addition, Mitigation Measure NOI-1 would be required to limit construction activities to daytime hours and would reduce potential construction period noise impacts for the indicated sensitive receptors to less-than-significant levels.

Mitigation Measure NOI-1 The project contractor shall implement the following measures during construction of the proposed project:

- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
- Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.
- Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all construction activities.
- Ensure that all general construction related activities take place between 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. Construction may begin on weekdays at 6:00 a.m. between June 1st and September 15th.

Operational Noise Impacts. The proposed project would include the construction of 590 new single-family residential units in the project site. Motor vehicles with their distinctive noise characteristics are the dominant noise source in the vicinity of the project site. The amount of noise varies according to many factors, such as volume of traffic, vehicle mix (percentage of cars and trucks),

average traffic speed, and distance from the observer. Implementation of the proposed project would result in new daily trips on local roadways in the vicinity of the project site. The EIR will determine the significance of operational noise impacts of the proposed project.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. No permanent noise sources would be located within the project site that would expose persons to excessive groundborne vibration or noise levels.

As discussed in discussion a) above, implementation of Mitigation Measure NOI-1 would require project construction activities to maintain the greatest possible distance to existing sensitive receptors to reduce potential impacts. Implementation of a buffer between sensitive receptors and construction activities would protect sensitive receptors from excessive groundborne vibration or groundborne noise levels.

Furthermore, the City of Clovis addresses temporary vibrations in Section 9.22.100, Noise, (D) of the Clovis Municipal Code, stating that vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks) are exempt from the provisions of this section.

Therefore, the proposed project would not permanently expose persons within or around the project site to excessive groundborne vibration or noise and the impact would be less than significant. This topic will not be included in the EIR.

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 2 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?

Less Than Significant Impact. The nearest medical center HPs to the project site include the Clovis Community Hospital HP located approximately 3.3 miles southeast of the project site, the Saint Agnes Medical Center HP, located approximately 4.2 miles southwest of the project site, and the Valley Children's Hospital HP located approximately 5.3 miles west of the project site.[25] The nearest airports to the project site include the Fresno Yosemite International Airport, located approximately 6.5 miles southwest of the project site, Fresno Chandler Executive Airport, located approximately 11.7 miles southwest of the project site, and the Sierra Sky Airport, located approximately 9.6 miles southwest of the project site. Each of the airports has an Airport Land Use Compatibility Plan (ALUCP) which guides local jurisdictions in determining appropriate compatible land uses with detailed findings and policies. The City of Clovis General Plan, other City land use plans, and all City land use decisions must be compatible with the adopted ALUCP for Fresno County. The project site is not within 2.0 miles of any public or private airstrip or helipad. Therefore, the proposed project would not result in the exposure of sensitive receptors to the excessive noise levels from aircraft noise sources. The impact would be less than significant. This topic will not be included in the EIR.

[25] California Department of Transportation (Caltrans). 2019. Caltrans HeliPlates. Website: https://heliplates.dot.ca.gov (accessed April 14, 2022).

3.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

3.14.1 Impact Analysis

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. The proposed project would consist in the construction of a 590-lot residential development for single-family residences. The proposed project would also include landscaped spaces, park areas, private streets, pedestrian, and utility infrastructure. The proposed project would also construct extensions to North Baron Avenue, Perrin Avenue, and Hammel Avenue to facilitate access to, and circulation around the project site. The project site is located within the Heritage Grove area, a growth area marked for development in the City's General Plan. The proposed project would introduce a residential use that would result in direct population growth. The project site is currently designated Medium Density Residential and zoned within the Exclusive Agricultural Zoning District (AE-20) of Fresno County. The proposed project would require annexation to the City of Clovis and an annexation application would be required to be submitted to the Fresno LAFCo.

Based on the City's current Housing Element,[26] the average number of persons residing in each household in Clovis is estimated to be 2.85 persons. As a result, following construction and occupation of the proposed project, it is estimated that approximately 1,682 residents would live within the proposed 590 residential units within the project site. The Clovis General Plan estimated that at full buildout of the General Plan, approximately 105,700 residents would be living in the areas located within the City's Non-SOI Planning Area (which includes the project site). As a result, the proposed project would not result in unplanned population growth because the City's General Plan identified and planned for the project site to be designated medium density residential. As such, the proposed project would be consistent with planned growth under the City's General Plan. Therefore, the proposed project would not induce substantial unplanned population growth in the City, and the impact would be less than significant. This topic will not be included in the EIR.

[26] City of Clovis. 2016. Fresno Multi-Jurisdictional 2015–2023 Housing Element. April. Website: https://cityofclovis.com/wp-content/uploads/2019/02/Clovis-Housing-Element-1.pdf (accessed September 21, 2022).

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

Less Than Significant Impact. The proposed project would include the removal of one existing 2,679-square-foot dwelling unit and garage, an existing propane tank, a 2,000-square-foot pole barn, two sheds, and an existing driveway on the project site. The removal of these structures would not displace a substantial number of people or residences from the site. Furthermore, the proposed project would introduce 590 new single-family residences into the project site. Therefore, the proposed project would not displace substantial number of existing people or housing, requiring the construction of replacement housing. The impact would be less than significant. This topic will not be included in the EIR.

3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. 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. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☒	☐
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☒	☐

3.15.1 Impact Analysis

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 any of the public services:

i. Fire protection?

Less Than Significant Impact. The Clovis Fire Department (CFD) would provide fire protection and emergency medical services to the project site. The CFD currently has five operational fire stations in the City, with the closest station, Fire Station 3, located approximately 2.22 miles southwest of the project site. Planned growth under the General Plan would increase calls for fire protection service in Clovis. The proposed project would introduce 590 single-family residences into the project site. After approval of annexation of the project site into the City of Clovis, the proposed project would be consistent with planned growth under the City's General Plan.

The proposed project could result in an incremental increase in the demand for fire protection services. However, the proposed project would be required to comply with all applicable codes for fire safety and emergency access. In addition, the Project Applicant would be required to submit plans to the CFD for review and approval prior to the issuance of building permits to ensure the proposed project would conform to applicable building codes. Furthermore, the Project Applicant would be required to pay a Fire Facility Development Impact Fee, pursuant to Section 4.10.04 of the Clovis Municipal Code, to account for the potential impacts to fire service facilities.

The CFD would continue providing services to the project site and would not require additional firefighters to serve the proposed project. The construction of a new or expanded fire station would not be required. The proposed project would not result in a significant impact on the physical environment due to the incremental increase in demand for fire protection and life safety services. The incremental increase in demand for services is not expected to adversely affect existing responses times to the site or within Clovis. Therefore, construction and operation of the proposed project would have a less than significant impact on fire protection. This topic will not be included in the EIR.

ii. Police protection?

Less Than Significant Impact. The Clovis Police Department (CPD) provides police protection services to the project site. The CPD headquarters are located approximately 3.3 miles southeast of the project site. Currently, CPD has 105 sworn officers, a ratio of 0.88 sworn officers per 1,000 residents. Planned growth under the General Plan would increase calls for police protection service in the City. However, the proposed project has been planned to be developed as medium density residential under the under the City's General Plan.

The proposed project could increase the demand of police protection services. The Project Applicant would be required to pay a Police Department Fee, pursuant to Section 4.11.04 of the Clovis Municipal Code, to account for the potential impacts to police protection services.

The CPD would continue to provide services to the project site and would not require additional officers to serve the project site. The construction of new or expanded police facilities would not be required. Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional police facilities or services and impacts to police protection would represent a less than significant impact. This topic will not be included in the EIR.

iii. Schools?

Less Than Significant Impact. Clovis Unified School District (CUSD) would provide school services to the proposed project. The proposed project involves a residential use that might generate an increase in student demand in the CUSD. The CUSD currently serves approximately 43,000 students from students living in the city of Fresno, Fresno County, and the city of Clovis. Planned growth under the General Plan and the proposed project would increase demand for school services.

The proposed project would increase the demand for school services in the vicinity. After annexation of the project site to the City of Clovis, the Project Applicant would be required to pay appropriate school developer fees at time of building permits to address potential impacts to CUSD services, as set forth in Education Code Section 17620, pursuant to Government Code 65995. Payment of school developer fees will address potential impacts related to constructing school facilities. As a result, the proposed project would not result in a substantial adverse impact associated with the provision of additional school facilities or services and impacts

related to increased demand for school services would represent a less than significant. This topic will not be included in the EIR.

iv. Parks?

Less Than Significant Impact. The proposed project would consist of a 590-lot residential development for single-family residences. The proposed project would also include the construction of a 13,930-square-foot community park, two community pools, and a recreation area. Planned growth under the General Plan would increase the demand for park facilities in the City. However, the proposed project has been planned to be developed as medium-density residential under the under the City's General Plan.

The proposed project could increase the demand for nearby parks and recreational facilities. However, the proposed project would include the construction of a private park and recreation area that would offset the demand for public parks in the vicinity of the project site. Furthermore, the Project Applicant would be required to pay any required development fees, pursuant to Section 3.4.03 of the Clovis Municipal Code, at the time building permits are obtained.

Therefore, the proposed project would not result in a substantial adverse impact associated with the provision of additional park facilities, and impacts to parks would represent a less than significant impact. This topic will not be included in the EIR.

v. Other public facilities?

Less Than Significant Impact. Planned growth under the General Plan would increase the demand for public facilities in the Clovis. After approval of annexation of the project site into the City of Clovis, the proposed project would be consistent with planned growth under the City's General Plan.

Development of the proposed project could also increase demand for other public services, including libraries, community centers, and public health care facilities. However, the increased demand on public facilities resulting from the proposed project is not expected to require the construction of new, or expansion of existing public facilities in the City. The Project Applicant would be required to pay applicable impact fees (e.g., Library Facilities Development Fee, Chapter 7.8 of the Clovis Municipal Code) to fund public facilities in the City. Therefore, the impact would be less than significant. This topic will not be included in the EIR.

3.16 RECREATION

	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?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

3.16.1 Impact Analysis

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. The proposed project would consist of a 590-lot residential development for single-family residences. The proposed project would also include the construction of a 13,930-square-foot community park, two community pools, and a recreation area.

The development of the proposed project would result in population growth which could increase the demand for recreational facilities in the vicinity of the project site. However, the proposed project would include the construction of a private park and recreation area that would offset the use of public parks in the vicinity of the project site. Furthermore, after annexation of the project site to the City of Clovis, the Project Applicant would be required to pay applicable park impact fees, pursuant to Section 3.4.03 of the Clovis Municipal Code, at the time building permits are obtained to offset project impact on existing recreational facilities. Therefore, the impact would be less than significant. This topic will not be included in the EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The proposed project would consist of a 590-lot residential development for single-family residences. The proposed project would also include the construction of a 13,930-square-foot community park. The potential environment effects resulting from construction of the community park within the project site is included in the analysis included in this Initial Study. Potential adverse physical effects would result in less than significant impacts. This topic will not be included in the EIR.

3.17 TRANSPORTATION

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

3.17.1 Impact Analysis

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

Potentially Significant Impact. The Circulation Element of the City of Clovis General Plan outlines the necessary transportation system standards and infrastructure needed to serve planned land use and development in the City of Clovis. The primary goal for the Circulation Element is to maintain and improve the road network of the City to safely and efficiently move people and goods, to reduce vehicle miles traveled through coordinated land use planning, to facilitate non-automotive travel (i.e., transit, bikes, and walking), and maintain the City's extensive recreational trail system.

The 2016 Clovis Active Transportation Plan (Active Transportation Plan)[27] supports walking, bicycling, transit, and use of other emerging modes of personal transport as alternatives to driving within Clovis, to neighboring cities, and regional destinations. The Active Transportation Plan defines the City's vision for an active transportation network and proposes a framework for implementing projects, programs, and policies to turn the vision into a reality. The Active Transportation Plan also identifies strategies to improve safety and accessibility for active forms of travel such as walking and bicycling.

Vehicular access to the project site would include East Behymer Avenue, and future extensions of North Baron Avenue, Perrin Avenue, and Hammel Avenue. The nearest transit facilities to the project site are located along West Teague Avenue and North Peach Avenue, approximately 0.5 mile south of the project site. The nearest walking and biking trail to the site includes the Dry Creek Trail (located approximately 0.65 mile southwest of the project site), and the Fresno-Clovis Rail Trail (located approximately 1.4 miles west of the project site). The nearest bike lanes to the site are located along East Shepherd Avenue and North Clovis Avenue, both of which are located approximately 0.4 mile south of the project site, respectively.

[27] City of Clovis. 2016. Active Transportation Plan. Website: https://cityofclovis.com/wp-content/uploads/2018/12/Active-Transportation-Plan-Final.pdf (accessed April 26, 2022)

Currently, information about project compliance with existing circulation plans is insufficient to make a determination about significance of potential impacts to circulation systems in the vicinity of the project site. This topic will be included in the EIR.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

Potentially Significant Impact. Senate Bill 743 (SB 743) requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as vehicle miles traveled (VMT) instead of level of service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the proposed project adds excessive car travel onto our roads, the proposed project may cause a significant transportation impact.

The *CEQA Guidelines* were amended to implement SB 743 by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that, except with respect to transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, LOS measures of impacts on traffic facilities are no longer a relevant CEQA criteria for transportation impacts.

CEQA Guidelines Section 15064.3(b)(4) states:

> [A] lead agency has discretion to evaluate a project's vehicle miles traveled (VMT), including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's VMT and revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate used to estimate vehicle miles traveled and any revision to model outputs should be documented and explained in the environmental document prepared for the proposed project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

On July 14, 2020, the City of Clovis adopted the Interim Transportation Impact Analysis Guidelines, dated July 14, 2020, pursuant to SB 743 to be effective on July 1, 2020.[28] Consistent with *CEQA Guidelines* Section 15064.3, the City of Clovis has adopted thresholds of significance to determine when a project will have a significant transportation impact based on VMT. The City has developed screening criteria to streamline the analysis for projects that meet certain criteria. A project will require a detailed VMT analysis unless it meets at least one of the City's five screening criteria:

- Projects that generate less than 500 vehicle trips per day (i.e., Single-Family Residential developments with less than 53 dwelling units).

- Local-serving retail projects with areas of 100,000 square feet and below.

[28] City of Clovis. 2020. Interim Transportation Impact Analysis Guidelines. Website: https://cityofclovis.com/wp-content/uploads/2020/10/PDS-SB-743-ATT-2-Interim-Transportation-Impact-Analysis-Guidelines.pdf (accessed April 22, 2022).

- Projects located in a High-Quality Transit Area (HQTA) as defined on Attachment A of the City's Interim Transportation Impact Analysis Guidelines.[29]

- Residential projects in HQTAs with a high proportion of affordable housing.

- Projects located in low VMT areas, as defined on Attachment B of the City's Interim Transportation Impact Analysis Guidelines.[30]

The proposed project does not qualify for a streamlined project VMT analysis under the screening criteria identified by the City. The EIR will provide a detailed analysis of project VMT to determine the significance of potential impacts and, if necessary, identify mitigation measures to reduce potential impacts.

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 proposed project would construct a 590-lot residential development for single-family residences. The development would potentially include landscaped spaces, private recreation, private streets, private pedestrian, public park and public utility uses. The proposed project would also result in the construction of extensions of North Baron Avenue, Hammel Avenue, and Perrin Avenue to facilitate access to, and circulation on, the project site. The proposed project would be required to construct all transportation facilities to meet the requirements of the City of Clovis to ensure that design features do not result in hazards to pedestrians, bicyclists, or drivers. In addition, the project site is located in an area surrounded by residential uses and rural residential uses, which are compatible with the proposed residential use. As a result, the proposed project would not increase hazards due to geometric design features or incompatible uses. Therefore, the impact would be less than significant, and this topic will not be included in the EIR.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The proposed project would construct a 590-lot residential development for single-family residences. The development would include landscaped spaces, private recreation, private streets, private pedestrian, public park and public utility uses.

Emergency vehicles would have access to the project site via East Behymer Avenue, as well as through future extensions of North Baron Avenue, Perrin Avenue, and Hammel Avenue. Emergency access to the project site, and project vicinity would not be rendered inadequate as a result of the proposed project. The extensions of Perrin Avenue, Hammel Avenue, and North Baron Avenue

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29 City of Clovis. 2020. Interim Transportation Impact Analysis Guidelines. Attachment A: High Quality Transit Areas Map. Website: https://cityofclovis.com/wp-content/uploads/2020/10/PDS-SB-743-ATT-2-Interim-Transportation-Impact-Analysis-Guidelines.pdf (accessed April 22, 2022).

30 City of Clovis. 2020. Interim Transportation Impact Analysis Guidelines. Attachment B: VMT Screening Maps. Website: https://cityofclovis.com/wp-content/uploads/2020/10/PDS-SB-743-ATT-2-Interim-Transportation-Impact-Analysis-Guidelines.pdf (accessed April 22, 2022).

resulting from the proposed project would increase access to emergency services in the vicinity of the project site. Therefore, the impact would be less than significant, and this topic will not be included in the EIR.

3.18 TRIBAL CULTURAL RESOURCES

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

3.18.1 Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant with Mitigation Incorporated. The State requires lead agencies to consider the potential effects of proposed projects and consult with California Native American tribes during the local planning process for the purpose of protecting Traditional Tribal Cultural Resources through the *CEQA Guidelines*. Pursuant to PRC Section 21080.3.1, the lead agency shall begin consultation with the California Native American tribe that is traditionally and culturally affiliated with the geographical area of the proposed project. Such significant cultural resources are either sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe which

is either on or eligible for inclusion in the California Historic Register or local historic register, or, the lead agency, at its discretion, and support by substantial evidence, choose to treat the resources as a Tribal Cultural Resources (PRC Section 21074(a)(1-2)).

Additional information may also be available from the NAHC's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.

AB 52, which became law January 1, 2015, requires that, as part of the CEQA review process, public agencies provide early notice of a project to California Native American Tribes to allow for consultation between the tribe and the public agency. The purpose of AB 52 is to provide the opportunity for public agencies and tribes to consult and consider potential impacts to Tribal Cultural Resources (TCRs), as defined by PRC Section 2107(a). Under AB 52, public agencies shall reach out to California Native American Tribes who have requested to be notified of projects in areas within or which may have been affiliated with their tribal geographic range. Pursuant to AB 52, Big Sandy Rancheria of Western Mono Indians, Cold Springs Rancheria of Mono Indians, Dumna Wo-Wah Tribal Government, Kings River Choinumni Farm Tribe, North Fork Rancheria of Mono Indians, North Valley Yokuts Tribe, Picayune Rancheria of Chuckchansi Indians, Table Mountain Rancheria, Traditional Choinumni Tribe, Tule River Indian Tribe, Wuksache Indian Tribe/Eshom Valley Band were invited to consult. Table Mountain Rancheria sent a response on November 15, 2022, requesting the CRA prepared for the project and did not request any further consultation. No further responses or requests for consultation were received by the City within the 30-day consultation period beginning November 4, 2022, and ending December 3, 2022. As such, AB 52 requirements for the proposed project have been fulfilled. AB 52 consultation request and response letters are included in Appendix A of this Initial Study.

No tribal cultural resources or historical resources were identified on the project site. If any artifacts are inadvertently discovered during ground-disturbing activities, existing federal, State, and local laws and regulations would require construction activities to cease until such artifacts are properly examined and determined not to be of significance by a qualified cultural resource professional. In addition, Mitigation Measures CUL-1 and CUL-2 included above in Section 3.5, Cultural Resources, would apply to the proposed project and would reduce potential impacts to unknown cultural and historical resources to less than significant. This topic will not be included in the EIR.

3.19 UTILITIES AND SERVICE SYSTEMS

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

3.19.1 Impact Analysis

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

Less Than Significant Impact. The proposed project would require the City's Public Utilities Department to provide water services to the project site. The project would require the construction of a 24-inch water main along Behymer Avenue from Clovis Avenue to Baron Avenue. Additionally, the project would construct a 24-inch main along Baron Avenue, from Behymer Avenue to Perrin Avenue. The proposed improvements would be consistent with the City's Water Master Plan and would be consistent with the City's specifications on materials, depth, and resurfacing.

Electric power and natural gas would be provided by PG&E. The proposed project may require construction of additional electric and gas infrastructure to serve the project site.

Stormwater from the project site would be drained through surface and subsurface drainage infrastructure located along North Baron Avenue, Perrin Avenue, and Hammel Avenue as well as along internal roadways in the project site and redirected towards FMFCD Basin BY, located adjacent to the project site's eastern boundary. A drainage channel would be constructed along the north side of the Perrin Avenue extension to direct stormwater flows from the project site towards Basin BY. Stormwater flows from upstream Basin BY would be directed to the west via the existing aqueduct located under the Enterprise Canal. The proposed project would comply with all FMFCD urban storm water system designs for construction of proposed infrastructure.

As discussed in this Initial Study, the impacts related to construction of the proposed project and associated utilities would not result in significant impacts or would be reduced to less than significant levels through the implementation of various mitigation measures. In the case of air quality and GHG emissions, additional information would be required to identify potential impacts related to construction and operation of required utilities. However, the impacts related to construction of utilities required for the proposed project would result in temporary construction impacts. As a result, impacts related to relocation or construction of new water, sewer and stormwater facilities would be less than significant. This topic will not be included in the EIR.

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 City of Clovis Public Utilities Department would supply water to the project site. Based on the City's 2020 Urban Water Management Plan Update, the water supplies under normal conditions for the City from 2025 (50,739 AFY) to 2040 (74,650 AFY) would be sufficient to cover the City's yearly water demand for this period (i.e., demand of 39,737 AF by 2025 and 52,598 AF by 2040).[31]

During a single dry year, projected water supplies for the City from 2025 (37,838 AF/year) to 2040 (53,109 AF)/year) would be sufficient to cover the City's yearly water demand for this period (i.e., 34,272 AF by 2025 and 47,133 AF by 2040).

After a 5-year dry period, water supplies for the City from 2025 (49,743 AFY) to 2040 (73,716 AFY) would be sufficient to cover the City's yearly water demand for this period (i.e., 37,825 AF by 2025 and 50,043 AF by 2040).

After completing the requirements and paying fees for annexation of the project site into the City of Clovis and paying applicable development fees, the proposed project would be consistent with growth under the City's General Plan and would be accounted for in the City's UWMP water demand projections and allocation. Therefore, the proposed project would have sufficient water supplies available to meet future demand during normal, dry and multiple dry years, and the impact would be less than significant. This topic will not be included in the EIR.

c. Would the project result in a determination by the wastewater treatment provider which 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. The City of Clovis Public Utilities Department provide wastewater services to the project site. Wastewater from the City of Clovis is treated on the Clovis Wastewater Treatment Plant and on the Fresno-Clovis Regional Wastewater Reclamation Facility. The proposed project would not result in a demand that would exceed the capacity of the wastewater treatment facility. Furthermore, in 2017 the City adopted an update to the Wastewater Collection System

[31] City of Clovis. 2021. Urban Water Management Plan 2020 Update. July 12. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf (accessed April 22, 2022).

Master Plan[32] which determined that the existing and planned wastewater collection system facilities can accommodate the proposed land uses and anticipated growth under the approved General Plan, including the project site and annexation area. For that reason, the impact would be less than significant. As such, the proposed project would be impacts associated with treatment of wastewater would be less than significant. This topic will not be included in the EIR.

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. Solid waste in the City of Clovis is collected by the Public Utilities Department. Solid waste generated within the City is delivered to three landfills: City of Clovis Landfill, American Avenue Disposal Site, and Avenal Regional Landfill.

The American Avenue Disposal Site (i.e., American Avenue Disposal Site 10-AA-0009) has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day.[33] The Clovis Landfill (i.e., City Of Clovis Landfill 10-AA-0004) has a remaining capacity of 7,740,000 cubic yards, a maximum permitted throughput of 2,000 tons per day, and an estimated closure date of April 30, 2047.[34] The Avenal Regional Landfill (i.e., Avenal Regional Landfill 16-AA-0004) has a remaining capacity of 28,900,000 cubic yards, a maximum permitted throughput of 6000 cubic yards, and an estimated closure date of March 31, 2056.[35]

Operation of the proposed project would generate approximately 7,216 pounds of solid waste per day or about 1,317 tons of solid waste per year.[36] Given the available capacity at the landfills, the additional solid waste generated by the proposed project is not anticipated to cause the facility to exceed its daily permitted capacity. As such, the proposed project would be served by a landfill with sufficient capacity to accommodate the proposed project's waste disposal needs, and impacts

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32 City of Clovis. 2017. Wastewater Collection System Master Plan. Website: https://cityofclovis.com/wp-content/uploads/2018/10/2017-Draft-Wastewater-Master-Plan.pdf (accessed September 21, 2022).

33 California Department of Resources Recycling and Recovery (CalRecycle). n.d. SWIS Facility/Site Summary. American Avenue Disposal Site (10-AA-0009). Website: https://www2.calrecycle.ca.gov/SolidWaste/Site/Summary/352 (accessed April 19, 2022).

34 California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Summary. City of Clovis Landfill (10-AA-0004). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4529?siteID=347 (accessed April 19, 2022).

35 California Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility/Site Summary. Avenal Regional Landfill (16-AA-0004). Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3755?siteID=898 (accessed April 19, 2022).

36 California Department of Resources Recycling and Recovery (CalRecycle). n.d. Estimated Solid Waste Generation Rates. Website: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates (accessed December 12, 2022). CalRecycle estimates that residential uses generate approximately 12.23 pounds of solid waste per day per household. Multiplied by 590 residential units, the total solid waste generated by the proposed project would be 7.215.7. To calculate solid waste generated per year, 7,215.7 was multiplied by 365 days to reach 2,633,730.5 pounds, or 1,316.87 tons per year.

associated with the disposition of solid waste would be less than significant. This topic will not be included in the EIR.

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

Less Than Significant Impact. The proposed project would comply, as applicable, with CALGreen, Senate Bill 1383 (SB 1383), and Policies 2.1 through 2.6 of the Public Facilities and Services Element of the City's General Plan, which provides waste management goals and recommendations for reduction and control of solid waste in the City as follows:

> **Policy 2.1: Minimize landfill disposal of solid waste.** Promote solid waste source reduction, reuse, and recycling; composting; and the environmentally-safe transformation of wastes.
>
> **Policy 2.2: Waste diversion rate.** Meet the state's current and future waste diversion goals through the city's recycling and diversion programs.
>
> **Policy 2.3: Expanded recycling.** Increase recycling by commercial, industrial, and multifamily generators.
>
> **Policy 2.4: Green and household hazardous materials waste.** Encourage citywide participation in green waste reduction and household hazardous waste disposal programs.
>
> **Policy 2.5: Clovis landfill.** Maintain at least 15 years of ongoing landfill capacity.
>
> **Policy 2.6: Solid waste facility encroachment.** Protect existing or planned solid waste facilities from encroachment by incompatible land uses that may be allowed through discretionary land use permits or changes in land use or zoning designations.

The proposed project would dispose of waste in accordance with applicable federal, State, and local recycling, reduction, and waste requirements and policies. As a result, the proposed project would not conflict with federal, State, and local management and reduction statutes and regulations related to solid waste, and the impact would be less than significant. This topic will not be included in the EIR.

3.20 WILDFIRE

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

3.20.1 Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The proposed project would include the construction of a 590-lot residential development for single-family residences. The development would include landscaped spaces, private recreation, private streets, private pedestrian, public park and public utility uses. The project site is surrounded by agricultural and single-family residential uses to the south, rural residential and agricultural uses to the east, agricultural and commercial uses to the west, and agricultural and rural residential uses to the north.

The proposed project would construct extensions of North Baron Avenue, Perrin Avenue and Hammel Avenue to facilitate access to, and circulation around the project site. Although construction of the roadway extensions would affect circulation of vehicles along Perrin Avenue, Hammel Avenue and North Baron Avenue, these impacts would be temporary and would not substantially or permanently impair emergency evacuation in Clovis.

Therefore, the proposed project would not substantially impair any nearby roadways that may serve as emergency evacuation routes or interfere with any emergency evacuation routes within the City of Clovis or an adopted emergency response plan. Therefore, the impact would be less than significant. This topic will not be included in the EIR.

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 located in an area mapped by CAL FIRE as LRA Unzoned, indicating that the area is urbanized and not susceptible to wildland conflagrations, and is not located within a VHFHSZ.[37] The proposed project would comply with City and County fire safety regulations for project construction and operation. Therefore, the proposed project would not exacerbate wildfire risks and potentially expose project occupants to wildfires. The impact would be less than significant. This topic will not be included in the EIR.

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 proposed project would require the extension of roads and installation of water and stormwater drainage infrastructure to serve the project site. The proposed project would construct extensions of North Baron Avenue, Hammel Avenue and Perrin Avenue to facilitate access to, and circulation around the project site. As discussed above, the proposed project is not located within a VHFHSZ. Additionally, the proposed project would comply with City and County fire safety regulations for project construction and operation, which would mitigate potential risks associated with construction of roads and installation of water and wastewater infrastructure. As a result, a less than significant impact would occur. This topic will not be included in the EIR.

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?

Less Than Significant Impact. As discussed above, the project site is not located within a VHFHSZ. The project site is also a relatively flat area and is not adjacent to any hills. In general, the potential for land sliding or slope failure in the City is very low, and the project site would not be susceptible to landslides. Parts of the project site are located within special flood hazard zones; however, the proposed project would implement standards and design requirements from the City of Clovis Municipal Code Section 8.12, Floodplain Management. Therefore, the proposed project would not expose people or structures to significant post-fire risks, and the impact would be less than significant. This topic will not be included in the EIR.

[37] California Department of Forestry and Fire Protection (CAL FIRE). 2007. Fresno County Fire Hazard Severity Zones in LRA. Website: https://osfm.fire.ca.gov/media/6673/fhszl06_1_map10.pdf (accessed April 14, 2022).

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APPENDIX A

AB 52 CONSULTATION REQUEST AND RESPONSE LETTERS

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City of Clovis

Department of Planning and Development Services

CITY HALL . 1033 FIFTH STREET . CLOVIS, CA 93612

Native American Tribal Consultation Request

Date: 11/4/2022

Project Title: TM6343 et al

Local Government/Lead Agency: City of Clovis Planning Division

Project Manager: Lily Cha-Haydostian, Senior Planner Phone: (559) 324-2335

Address: 1033 Fifth Street City: Clovis St: CA Zip: 93612

Email: lilyc@cityofclovis.com Fax: (559) 324-2844

Project Location: See attached map

Project Proponent: Wilson Premier Homes, Inc. (Applicant)
7550 N. Palm Avenue, Suite #102
Fresno, CA 93711

Local Action Type:

- [ ] General Plan Amendment
- [ ] Specific Plan Amendment
- [X] Project Subject to AB52
- [ ] Pre-Planning Outreach

Project Description:
RO305; a request for the annexation of 246 acres of property located southwest of Behymer and Sunnyside Avenues.

GPA2021-003; a request to redesignate 71.54 acres of property from the the City of Clovis Medium Density to Medium High Density

R2021-006; a request to prezone 71.54 acres of property to the City of Clovis R-1-PRD Zone District

TM6343; a request to subdivide 71.54 acres of property to 590 lots

PDP2021-001; a request for the approval of a planned development permit

We request that you respond within 30 days per the requirements of Assembly Bill 52 (AB 52) [Public Resources Code Section 5097.94] and also thank you in advance for your participation in the review process for this project. If you need additional materials or have any questions, please feel free to contact the Project Manager listed above.

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TABLE MOUNTAIN RANCHERIA
CULTURAL RESOURCES DEPARTMENT

"Preserving our past, Protecting our future"

Robert Pennell
Cultural Resources Department Director

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CERTIFIED 2768 6008

November 15, 2022

City of Clovis
Lily Cha-Haydostian, Senior Planner
1033 Fifth Street
Clovis, Ca. 93612

RE: TM6343 et al, General Plan Amendment and Project Subject to AB52

Dear: Lily Cha-Haydostian

Table Mountain Rancheria is responding to your letter dated, November 04, 2022, regarding, proposed TM6343 et al, General Plan Amendment and Project Subject to AB52. Thank you for notifying Table Mountain Rancheria of the potential development and request for consultation. The Rancheria is very interested in this project as it lies within our cultural area of interest.

If you have already conducted a record search, please provide Table Mountain Rancheria with copies of any cultural resource report you may have.

At this time, please contact our office at (559) 325-0351 or rpennell@tmr.org to coordinate a discussion and meeting date regarding your project.

Sincerely,

Robert Pennell
Tribal Cultural Resources Director

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APPENDIX B

WATER INFRASTRUCTURE INVESTIGATION

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PROVOST& PRITCHARD
CONSULTING GROUP
An Employee Owned Company

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Clovis, CA 93611-0242
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www.provostandpritchard.com

Memorandum

To:	Gene Abella, PE, City of Clovis
From:	Nick Jacobson, PE
Subject:	Water Infrastructure Investigation for Tentative Tract Map 6343
Date:	December 19, 2022

Provost and Pritchard Consulting Group ("P&P") has prepared this memorandum summarizing the findings of our investigation into the water system infrastructure required to serve a proposed single-family residential development generally located along the east side of Clovis Avenue between Perrin and Behymer Avenues.

Project Information

It is our understanding that Tentative Tract Map (Tract) 6343 (Project) will have a land use designation of medium high density residential (7.1 to 15.0 dwelling units per acre [du/ac]), which differs from the original designation of medium density (4.1 to 7.0 du/ac), originally considered for this area in the City of Clovis Water Master Plan (WMP) Update – Phase III (Provost & Pritchard, 2018). The Project covers an area of approximately 71.54 gross acres (64.36 net acres), encompassing two parcels entirely, and a portion of a third parcel (APNs 556-040-08, 07, and 556-030-14) within the Northwest Village planning area.

There is no existing infrastructure adjacent to the project footprint. It is understood that before the Project is built several master planned water mains will be constructed near or adjacent to the Project as part of the buildout of Tract 6200 including:

- *a 12-inch main in Marion Avenue from Perrin Avenue to Heirloom (Pryor) Avenue*
- *a 12-inch main in Heirloom (Pryor) Avenue from Marion Avenue to Sunnyside Avenue*
- *a 16-inch main in Baron Avenue from Clovis Avenue to Perrin Avenue*

Additionally, an added transmission water main is anticipated with Tract 6205, east of Sunnyside Avenue but it is not anticipated to be constructed prior to Tract 6343:

- *a 12-inch main in Heirloom (Pryor) Avenue from Sunnyside Avenue and continuing south through the Tract, to Shepherd Avenue.*

There are master planned water mains that will be constructed as part of the Tract 6343 improvements, including:

- *a 24-inch main in Behymer Avenue from the west limits of Tract 6343 to Baron Avenue*
- *a 24-inch main in Baron Avenue from Behymer Avenue to Perrin Avenue*

Mains internal to and along the frontage of Tract 6343 will be constructed as part of the Project. It is anticipated that the 12-inch main in Clovis Avenue from Baron Way to Behymer Avenue along with the portion of the 24-inch mains in Behymer Avenue between Baron Way and Clovis Avenue not along the frontage of Tract 6343 may also be constructed with this Project. Collectively these mains would connect to infrastructure associated with Tract 6200 to the southeast of the Project. Collectively, these existing and planned facilities convey or will convey water from the surface water treatment plant which is located approximately 5.5 miles to the southeast of the Project. This portion of Clovis' potable water system is within the pressure zone called "Zone 2." Figure 1 shows the existing and proposed infrastructure in the area.

The Project straddles the Kings River service area boundary for Fresno Irrigation District (FID) therefore approximately half of the Project is within the Kings River service area and the remaining half is outside the Kings River service area for FID. The portion of the project within the service area has access to water from the Kings River as its source of supply, while the portion outside of the service area does not. The existing project site consists of a residential dwelling, fallow land, and various row crop plantings. The proposed use will consist of a new 590-unit single family residential development on 71.54 gross acres

Assumptions

The following assumptions apply to this investigation:

- The City requires a minimum of two points of connection to the existing water system.
- Developer is responsible for sizing all water mains and other water related infrastructure internal to the Project.
- The Clovis Fire Department (CFD) requires a minimum fire flow of 1,800 gallons per minute (gpm) and a minimum residual pressure of 35 pounds per square inch (psi), per CFD Standard #2.3.
- Existing infrastructure sizes based on GIS data from the City (see Figure 1).
- Recycled water will not be applied to public landscaping surrounding the Project.
- Infrastructure conditioned on Tract 6200 will be constructed prior to development of Tract 6343.
- Tract 6200 is modeled as medium density residential.
- Tract 6343 is modeled as medium high density residential (MHDR).
- Existing and proposed Water system demands will be based on unit demand from the *Water Master Plan Update Phase III - Facilities Plan* (Provost & Pritchard, 2018).
- The analysis will reflect the demands associated with existing developments in the area based on actual land use; undeveloped areas are modeled utilizing land use designations specified in the General Plan. Proposed demands will be modeled using the above referenced land use designations rather than that shown in the General Plan.
- Figure 1 shows the existing and master planned water mains and facilities in the vicinity of the Project, including those conditioned with Tract 6200 shown as existing.
- For Alternative 1 the analysis assumed the transmission grid main infrastructure shown as existing and future (See Figures 2, and 3) as well as the proposed tank, booster pump

station, and tank fill valve, have been constructed and are operational or are under construction and are assumed to be operational for the purposes of this modeling effort.

- For Alternative 2 the analysis assumed the transmission grid main infrastructure shown as existing and future (See Figures 4 and 5) have been constructed and are operational or are under construction and are assumed to be operational for the purposes of this modeling effort.
- For Alternative 3 the analysis assumed the transmission grid main infrastructure shown as existing and future (See Figures 6 and 7), have been constructed and are operational or are under construction and are assumed to be operational for the purposes of this modeling effort.
- For Alternative 4, (See Figures 8 and 9), the analysis assumed the transmission grid main infrastructure shown as existing have been constructed and are operational or are under construction and are assumed to be operational for the purposes of this modeling effort. No future infrastructure is assumed.
- The system is operating with all valves open.
- System velocities should not exceed 10 feet per second (fps).

This investigation will include analysis of whether the existing (or soon to be existing) water system, as described above and shown on the attached figures, will be sufficient to provide up to maximum day demand and also meet Maximum Day Demand (MDD) plus Fire Flow (MDD+FF) demands per the WMP requirements both with and without the City's Surface Water Treatment Plant (SWTP) in operation. The analyses without the SWTP are modeled with a reduced demand consistent with that historically experienced in the autumn months when the SWTP is not operational due to canal maintenance activities.

Water Demand

Potable water demands for the Project were estimated using land-use-based unit water demand factors from the WMP. Table LU-2 in the Land Use Element of the City General Plan (GP) states that MHDR has an allowable density ranging from 7.1 – 15.0 du/ac. The proposed use equates to a dwelling unit density of approximately 8.25 du/ac, consistent with MHDR land use. A separate water supply assessment (WSA) was prepared by P&P in September 2022. The WSA estimated water demands for the Project. For consistency, the demand estimates stated in the WSA were used for this analysis. For specifics surrounding Project water demands refer to the WSA.

Infrastructure

The Project is comprised of three (3) parcels of mostly row crop agricultural land a residential dwelling generally located along the east side of Clovis Avenue between Perrin and Behymer Avenues. Because of the limited existing backbone infrastructure in the area, this development will depend on the construction of infrastructure planned to be built with Tract 6200. The other transmission mains near the Project are understood to be existing, as shown on Figure 1. Design

of the required water mains internal to the Project will be the responsibility of the Project developer.

Water Supply

Urbanization within Clovis occurs both inside and outside the Kings River service area for Fresno Irrigation District (FID), therefore not all lands have access to this water source. Lands generally located south and west of the Enterprise Canal are within the Kings River service area and as such are entitled to an average annual allotment of approximately 2.24 acre-feet per acre (AF/ac). The MHDR land use has a unit demand greater than the 2.24 AF/ac supply available. The City adopted an ordinance requiring new development with demands exceeding the allotment to pay fees, so the City can acquire additional water supply to serve the development. The Project will need to pay for supplies for demands over and above the FID available supply for the Project area within FID[1] and for all demands for the Project area outside FID, as shown below. For additional details on water supply for the Project, refer to the WSA (Provost & Pritchard, September 2022) prepared for the Project.

Table 1. Reconciliation of Surface Water Supply and Demand

Land Use Category	Area (ac)	Land Use Demand Factor (AFY/ac)	Annual Average Demand (AFY)	FID Entitlement (AFY)	Additional Supply Required (AFY)
Proposed					
Medium-High Density Residential – within FID	38.6	3.3	127.4	86.5	(40.9)
Medium-High Density Residential – outside FID	32.9	3.3	108.6	0.0	(108.6)
Proposed Total	71.5	3.3	236.0	86.5	(149.5)

Evaluation

The City has requested an investigation, utilizing the current City hydraulic model, to determine whether the proposed infrastructure in the vicinity of the Project (Figure 1) will provide adequate service during MDD and MDD+FF for several infrastructure scenarios including:

- Alternative 1: with 3.5 million gallons of storage capacity at the T-9 site[2].
- Alternative 2: with no storage capacity at the T-9 site and construction of water mains south of Shepherd Avenue and along Sunnyside and Nees Avenues, connecting to the existing water system in Nees Avenue (WMP designated mains P-3, P-4, and P-7).
- Alternative 3: with no storage capacity at the T-9 site and construction of water mains south of Shepherd Avenue and along Sunnyside and Teague Avenues, connecting to the existing water system at Fowler Avenue (WMP designated mains P-3, and P-6).

[1] Approximately 54 percent of the Project Area lies within the FID King River service area boundary.
[2] The T-9 water storage tank and booster pump site is at the northwest corner of Perrin and Sunnyside Avenues.

- Alternative 4: no storage capacity at the T-9 site, and only utilizing existing infrastructure and previously constructed infrastructure associated with Tract 6200.

As shown on Figure 1, infrastructure associated with Tract 6343, was modeled with 8-inch mains internal to the Project. Also, the results of this evaluation rely on the infrastructure that has been conditioned on Tract 6200 being constructed and operational.

Maximum Day Demand Analyses

Alternative 1

With an Operational SWTP

The hydraulic model analysis results with the SWTP operational indicates no pressure deficiencies internal to the Project. Minimum pressures during the MDD scenario are all above 40 psi.

Without an Operational SWTP

The hydraulic model analysis results with the SWTP not operational indicates no pressure deficiencies in Tracts 6343. The model results did show a portion of the system with minimum pressures below 40 psi in the Harlan Ranch portion of the system, mainly east of Sanders Avenue. Minimum pressures in Harlan Ranch dropped in places to approximately 31 psi during the peak demand hour of the MDD scenario without the SWTP operational. As stated above, while typically during MDD the distribution system pressures should be over 40 psi, the results of the analysis are not below minimum required pressure of the system of 20 psi (Title 22 requirement). The deficiencies identified in the model only last for a short duration during the morning hour from 6:00 AM until about 7:00 AM. Average pressures throughout the time duration in this scenario were all over 40 psi for the analysis.

Alternative 2

With an Operational SWTP

The hydraulic model analysis results with the SWTP operational indicates no pressure deficiencies internal to the Project. Minimum pressures during the MDD scenario are all above 40 psi.

Without an Operational SWTP

The hydraulic model analysis results with the SWTP not operational indicates no pressure deficiencies in Tracts 6343. The model results did show a portion of the system with minimum pressures below 40 psi in the Harlan Ranch portion of the system. The area that shows minimum pressures below 40 psi has a larger footprint than the area identified in Alternative 1. For Alternative 2, the general area showing minimum pressures below 40 psi is in Harlan Ranch east of Locan Avenue. Minimum pressures in this area dropped in places to approximately 27 psi during the peak demand hours of the MDD scenario without the SWTP operational. As stated above, while typically during MDD the distribution system pressures should be over 40 psi, the results of the analysis are not below minimum required 20 psi pressure (Title 22) of the system.

The deficiencies identified in the model only last for a short duration during the morning hours from 5:45 AM until about 8:00 AM. Average pressures throughout the time duration in this scenario were all over 40 psi for the analysis.

Alternative 3

With an Operational SWTP

The hydraulic model analysis results with the SWTP operational indicates no pressure deficiencies internal to the Project. System wide, minimum pressures during the MDD scenario are all above 40 psi.

Without an Operational SWTP

The hydraulic model analysis results with the SWTP not operational indicates no pressure deficiencies in Tracts 6343. The model results did show a portion of the system with minimum pressures below 40 psi in the Harlan Ranch portion of the system. The area that shows minimum pressures below 40 psi has a larger footprint than the area identified in Alternative 1. For Alternative 3, the general area showing minimum pressures below 40 psi is in Harlan Ranch east of Locan Avenue, similar to the footprint identified in Alternative 2. Minimum pressures in this area dropped in places to approximately 27 psi during the peak demand hours of the MDD scenario without the SWTP operational. As stated above, while typically during MDD the distribution system pressures should be over 40 psi, the results of the analysis are not below minimum required pressure of the system. The deficiencies identified in the model only last for a short duration during the morning hours from 5:45 AM until about 8:00 AM. Average pressures throughout the time duration in this scenario were all over 40 psi for the analysis.

Maximum Day Demand Plus Fire Flow

Alternative 1

With an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 58 psi (see Figure 2). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,365 gpm.

Without an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 64 psi (see Figure 3). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,365 gpm. The available pressures are slightly higher under this scenario than when the SWTP is online under alternative 1 because this analysis assumes that the SWTP is not operational during a lower demand period described on Page 2. Should the SWTP go offline during a typically high demand period like summer, the analysis would yield different results with potential for pressure drops below 20 psi.

Alternative 2

With an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 54 psi (see Figure 4). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,366 gpm.

Without an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 58 psi (see Figure 5). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,360 gpm. The available pressures are slightly higher under this scenario than when the SWTP is online under alternative 2 because this analysis assumes that the SWTP is not operational during a lower demand period described on Page 2. Should the SWTP go offline during a typically high demand period like summer, the analysis would yield different results with potential for pressure drops below 20 psi.

Alternative 3

With an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 56 psi (see Figure 6). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,366 gpm.

Without an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 60 psi (see Figure 7). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,356 gpm. The available pressures are slightly higher under this scenario than when the SWTP is online under alternative 3 because this analysis assumes that the SWTP is not operational during a lower demand period described on Page 2. Should the SWTP go offline during a typically high demand period like summer, the analysis would yield different results with potential for pressure drops below 20 psi.

Alternative 4

With an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures

internal to the Project range from approximately 35 psi to approximately 52 psi (see Figure 8). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 3,970 gpm.

Without an Operational SWTP

The minimum pressure required during fire flow conditions (1,800 gpm) is 35 psi with a maximum velocity of 10 fps. The MDD+FF hydraulic model analysis results show available pressures internal to the Project range from approximately 35 psi to approximately 58 psi (see Figure 9). Available fire flow at the hydrants internal to the Project ranged from 1,920 gpm to as much as 4,350 gpm. The available pressures are slightly higher under this scenario than when the SWTP is online under alternative 4 because this analysis assumes that the SWTP is not operational during a lower demand period as described on Page 2. Should the SWTP go offline during a typically high demand period like summer, the analysis would yield different results with potential for pressure drops below 20 psi.

Conclusion

The modeling analysis indicates that the proposed infrastructure within the Project, as shown on the attached figures, along with the proposed connections points should be able to receive adequate flow and pressure during an MDD scenario and during an MDD+FF scenario with the SWTP operational. With the SWTP not in operation, the analysis shows that the system should be able to deliver MDD and MDD+FF scenarios as well. The City should note that the ability to deliver water to satisfy fire flow requirements without the aid of the SWTP is applicable to lower demand periods such as those experience during the autumn timeframe.

Based on information collected during this investigation and the City's adherence to recommendations from prior water supply planning efforts, 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. The Project may proceed with the existing infrastructure and the planned infrastructure along the Project frontage as shown in Alternative 4. Additional master planned infrastructure, discussed in Alternatives 1, 2 and 3 are not required to deliver adequate flow and provide sufficient pressure to the Project, but are recommended, in part, to provide system redundancy to the Project area.

Serving this Project should not negatively impact the City's ability to provide a supply and delivery of water to reasonably foreseeable users within the City assuming adherence to recommendations from prior water resources planning efforts. However, to understand the cumulative impacts to supplies and other major water infrastructure, the City should be tracking changes in demand as part of the development process in order to determine when projects with greater demand are offset by projects with demands lower than originally planned.

Respectfully,

Nicholas Jacobson

Enclosures:

- Figure 1 – Potable Water Infrastructure
- Figure 2 – Alternative 1 – Maximum Day Demand plus Fire Flow with Operational SWTP
- Figure 3 – Alternative 1 – Maximum Day Demand plus Fire Flow without Operational SWTP
- Figure 4 – Alternative 2 – Maximum Day Demand plus Fire Flow with Operational SWTP
- Figure 5 – Alternative 2 – Maximum Day Demand plus Fire Flow without Operational SWTP
- Figure 6 – Alternative 3 – Maximum Day Demand plus Fire Flow with Operational SWTP
- Figure 7 – Alternative 3 – Maximum Day Demand plus Fire Flow without Operational SWTP
- Figure 8 – Alternative 4 – Maximum Day Demand plus Fire Flow with Operational SWTP
- Figure 9 – Alternative 4 – Maximum Day Demand plus Fire Flow without Operational SWTP

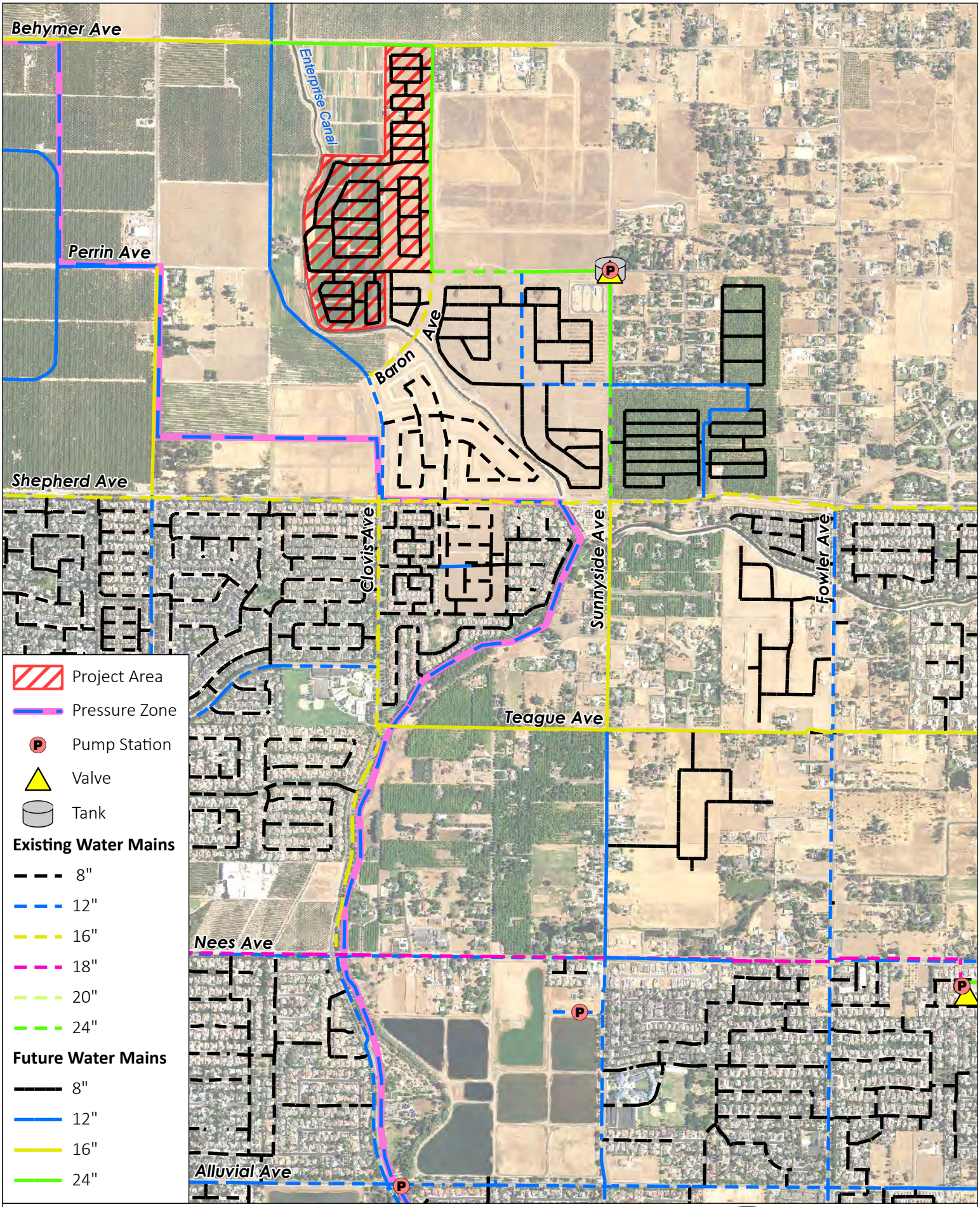

Figure 1: Existing Infrastructure

Water Supply Assessment

PROVOST& PRITCHARD

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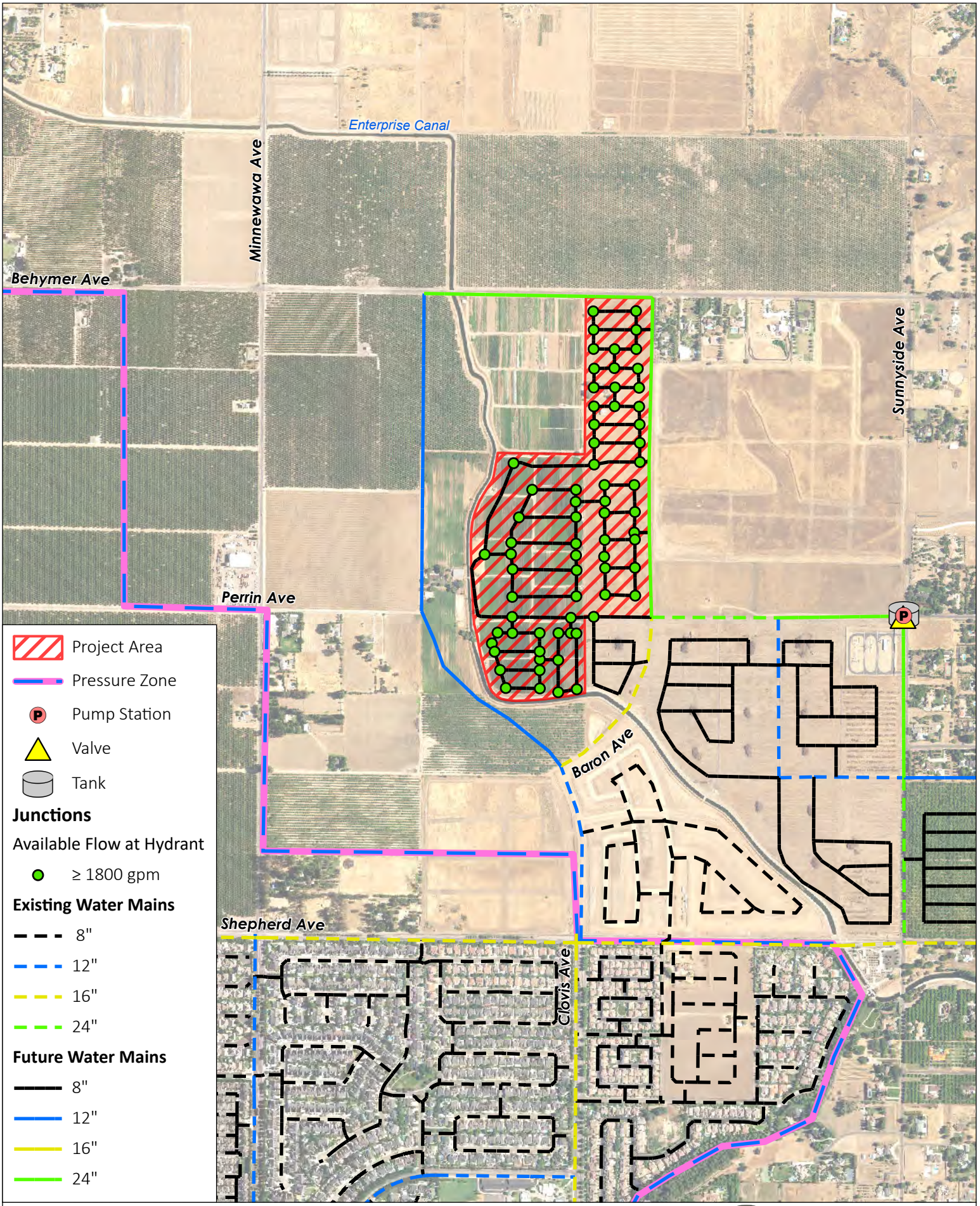

Figure 2: Alternative 1 Maximum Day Demand Plus Fire Flow with Operational SWTP

Water Supply Assessment

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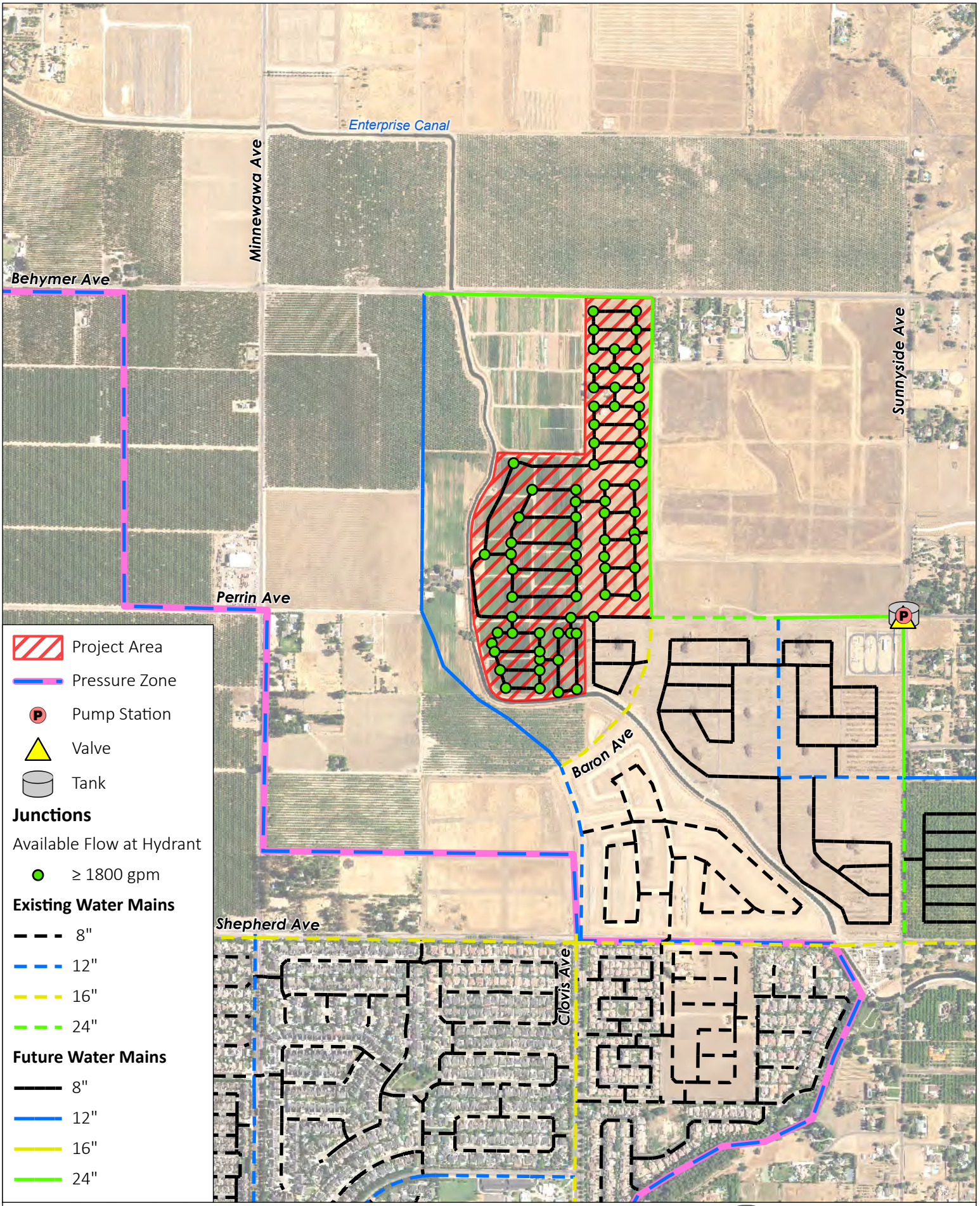

Figure 3: Alternative 1 Maximum Day Demand Plus Fire Flow without Operational SWTP

Water Supply Assessment

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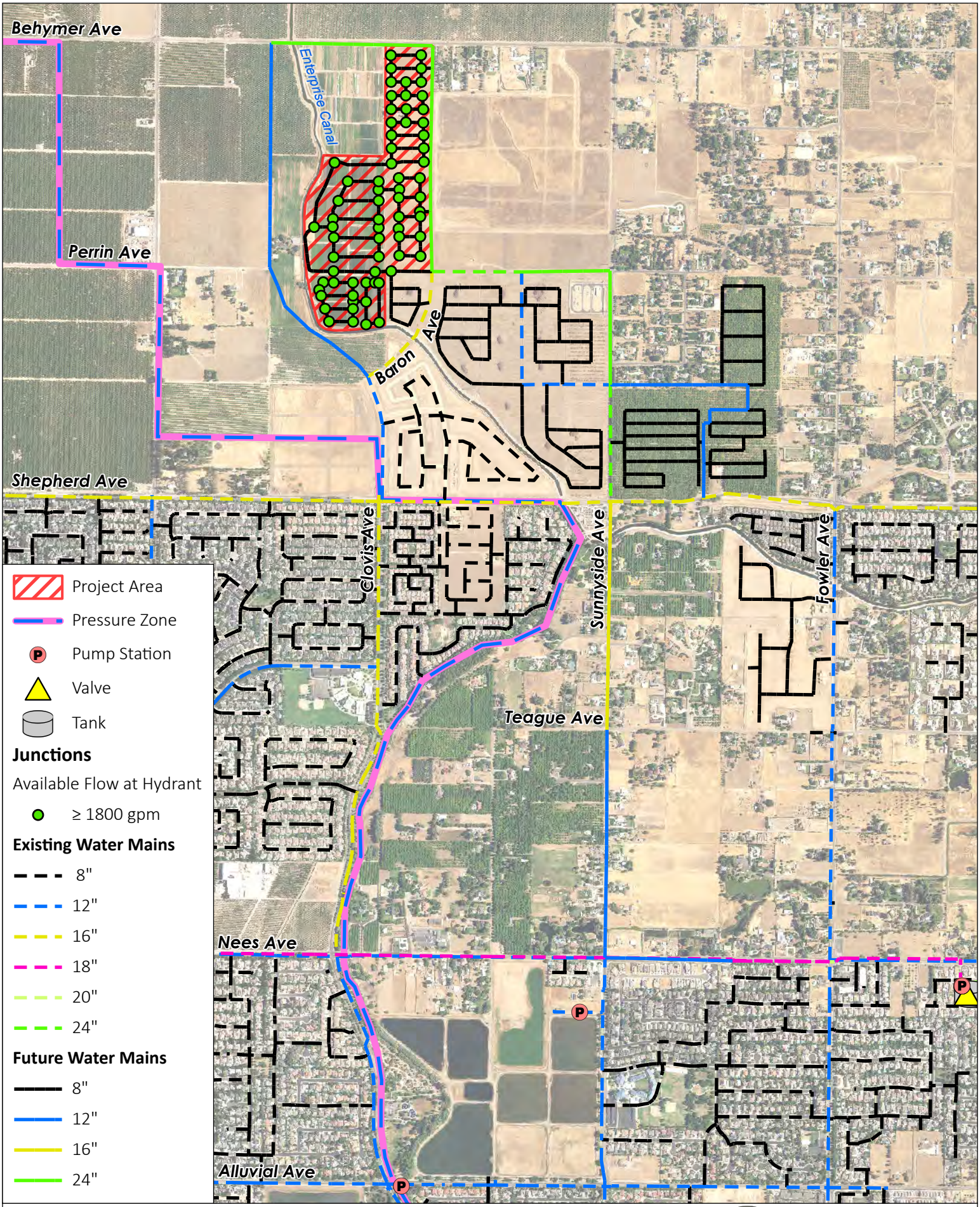

Figure 4: Alternative 2 Maximum Day Demand Plus Fire Flow with Operational SWTP

Water Supply Assessment

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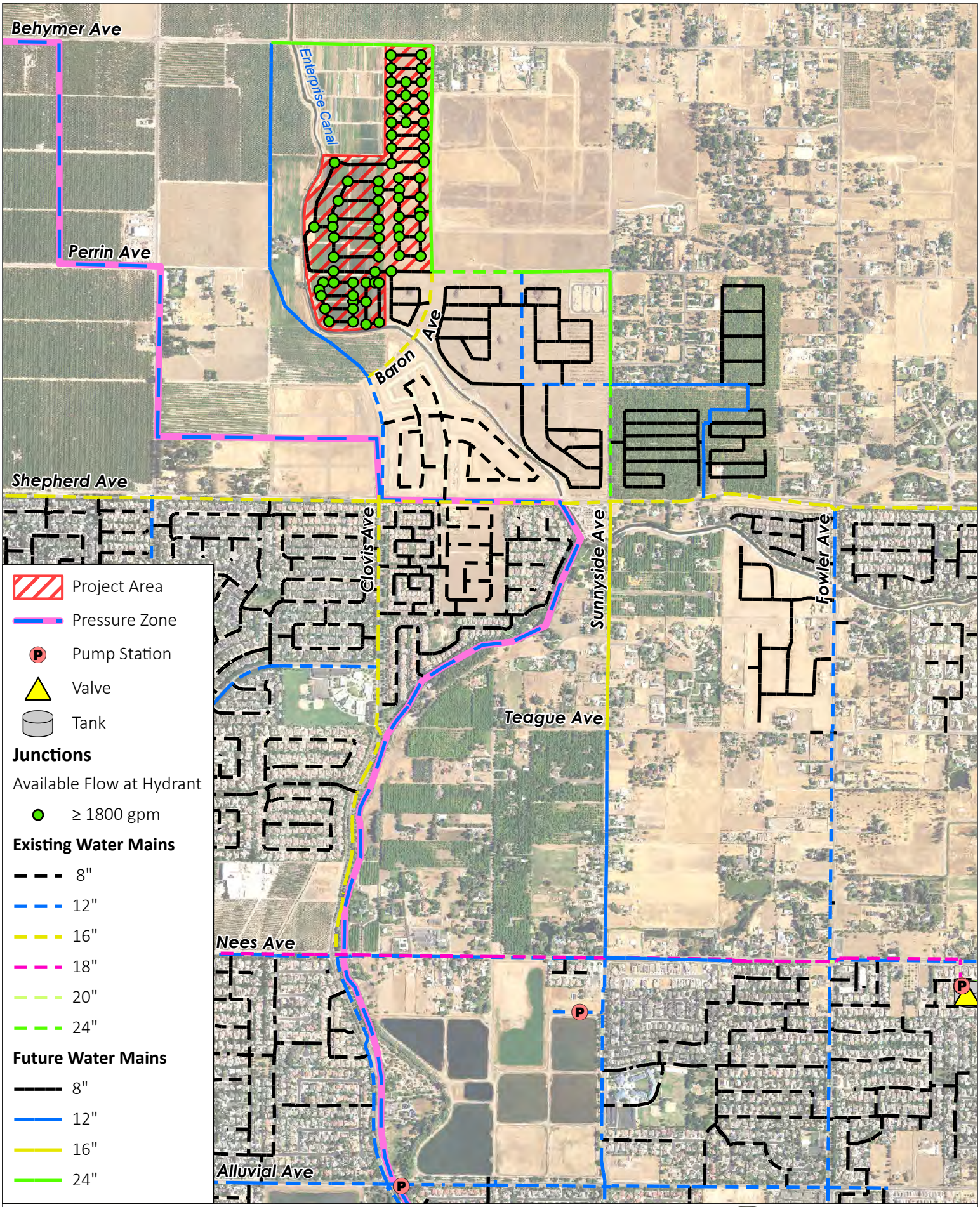

Figure 5: Alternative 2 Maximum Day Demand Plus Fire Flow without Operational SWTP

Water Supply Assessment

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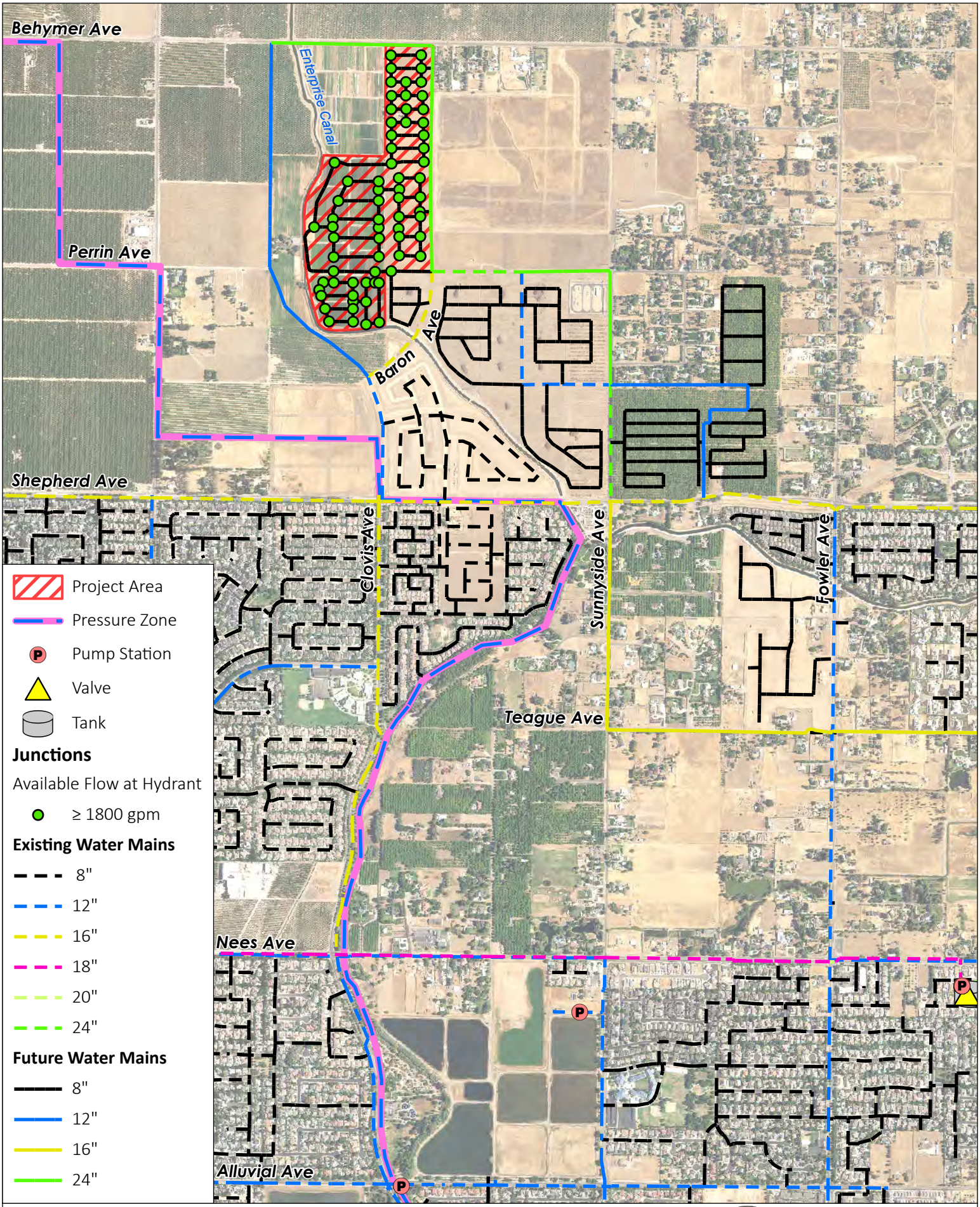

Figure 6: Alternative 3 Maximum Day Demand Plus Fire Flow with Operational SWTP

Water Supply Assessment

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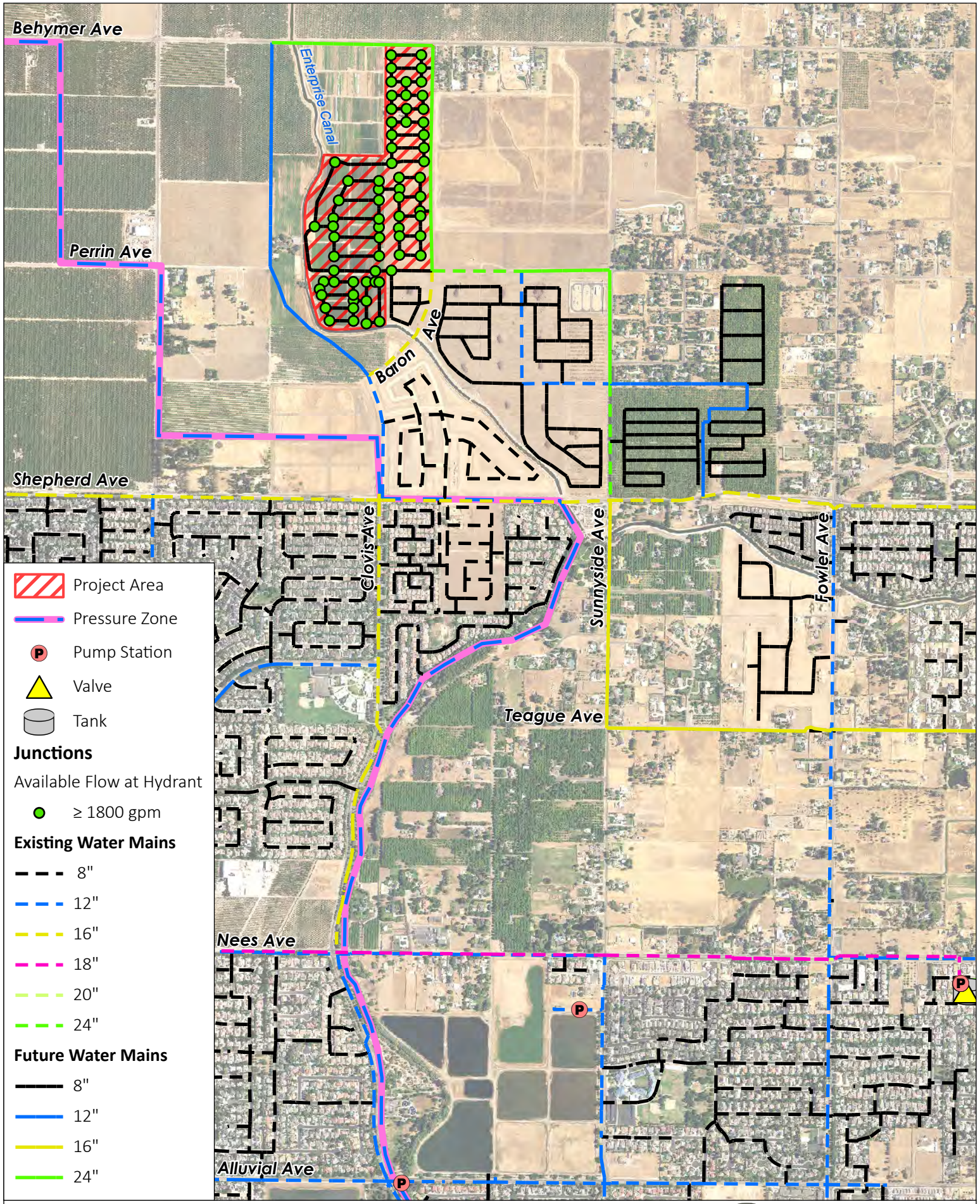

Figure 7: Alternative 3 Maximum Day Demand Plus Fire Flow without Operational SWTP

Water Supply Assessment

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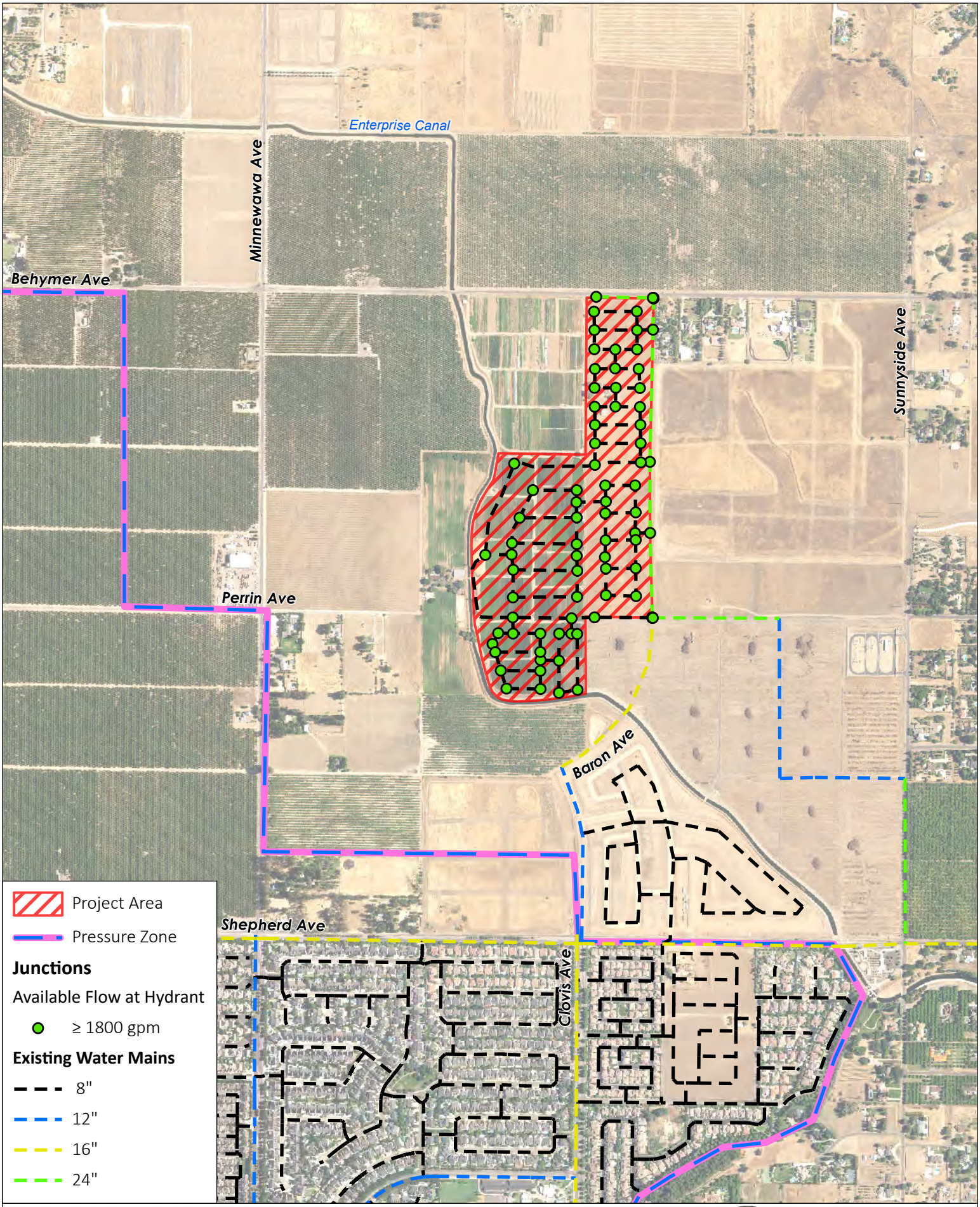

Figure 8: Alternative 4 Maximum Day Demand Plus Fire Flow With Operational SWTP

Water Supply Assessment

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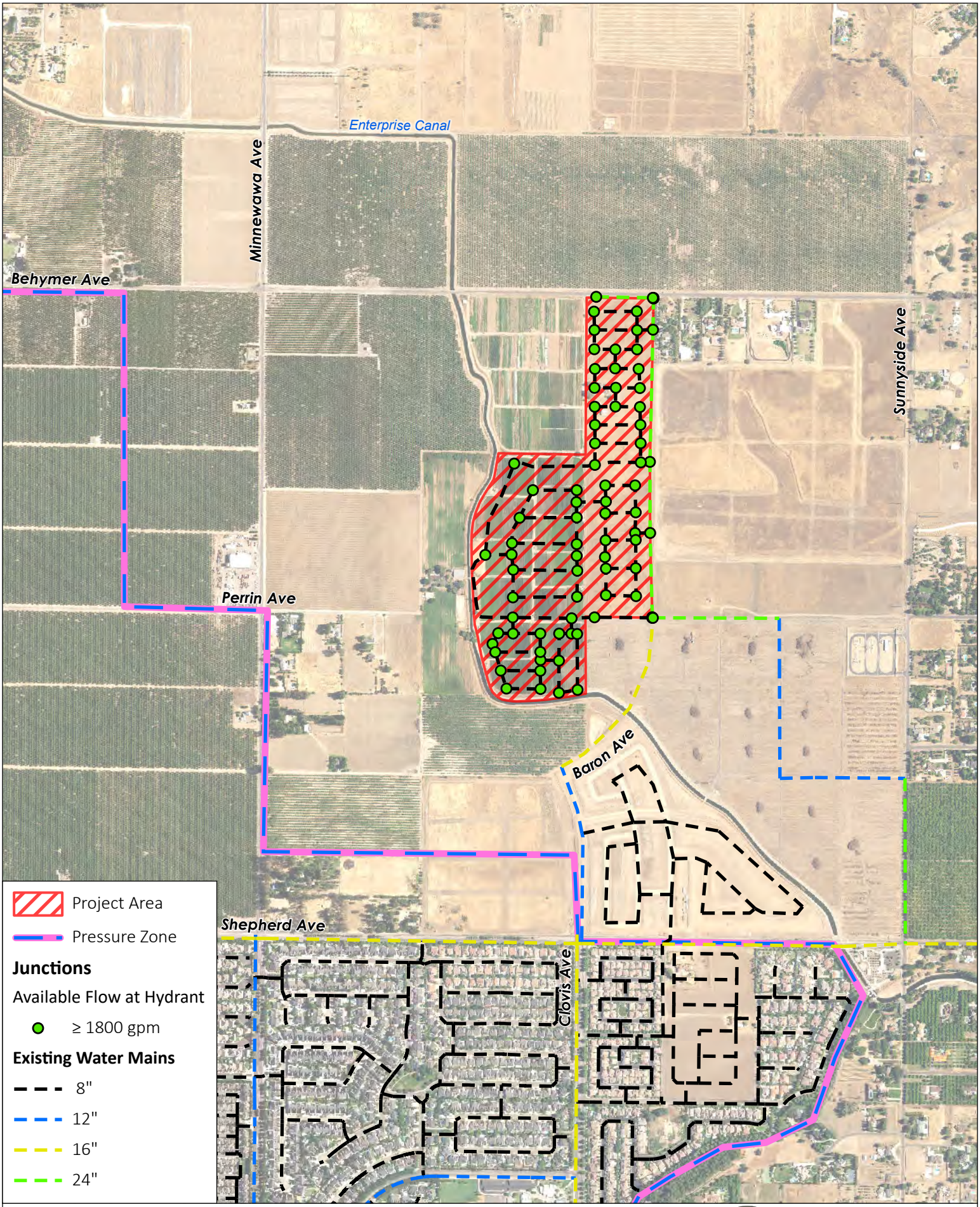

Figure 9: Alternative 4 Maximum Day Demand Plus Fire Flow Without Operational SWTP

Water Supply Assessment

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APPENDIX C

WATER SUPPLY ASSESSMENT

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City of Clovis

Water Supply Assessment

Tract 6343

Northwest Sphere of Influence Expansion Area

December 2022

Prepared for:
City of Clovis

Prepared by:
Provost & Pritchard Consulting Group
455 W Fir Avenue, Clovis, CA 93611

Report Prepared for:

Client Name

City of Clovis
1033 5th Street
Clovis, CA 93612

Contact:

Sean Smith
(559) 324-2363

Report Prepared by:

Provost & Pritchard Consulting Group

Heather Bashian, PE
Brittney Darnell

Contact:

Heather Bashian, PE

(559) 449-2700

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Abbreviations

AF ..... acre-feet
AFY ..... acre-feet per year
City ..... City of Clovis
County ..... Fresno County
CVP ..... Central Valley Project
CWC ..... California Water Code
FID ..... Fresno Irrigation District
GP ..... General Plan
GWD ..... Garfield Water District
IWD ..... International Water District
KRWA ..... Kings River Water Association
MDR ..... Medium Density Residential
MGD ..... million gallons per day
MHDR ..... Medium High Density Residential
NKGSP ..... North Kings Groundwater Sustainability Plan
RWRF ..... Regional Water Reclamation Facility
SOI ..... sphere of influence
SRF ..... Single-Family Residential
SWTP ..... City of Clovis Surface Water Treatment Plant
USBR ..... US Bureau of Reclamation
UWMP ..... City of Clovis Urban Water Management Plan
WDF ..... Water Demand Factors
WMP ..... City of Clovis, Draft Water Master Plan Update, Phase III
WRF ..... City of Clovis Sewage Treatment/Water Reuse Facility
WSA ..... Water Supply Assessment
WSCP ..... Water Shortage Contingency Plan

1 Introduction

1.1 Purpose and Need for the Water Supply Assessment

California Water Code (CWC) §10912(a) requires preparation of a Water Supply Assessment (WSA) meeting the requirements of CWC §10910 et seq for projects within cities and counties that meet one of several water demand triggers, or the equivalent. These triggers include construction of 500 or more residential units, construction of a shopping center or business establishment having 500,000 square feet of floor space, construction of a commercial office building having more than 250,000 square feet, a proposed hotel or motel having more than 500 rooms, or another project having a water demand equivalent to or greater than the 500-unit development.

This WSA evaluates the adequacy of available water supplies for the proposed Tentative Tract Map No. 6343 (Tract 6343), located in the City of Clovis, Fresno County, California. The Project would entail the development of 590 single-family residential lots, which is greater than the "500 residential units" trigger; therefore, a WSA is required. The City of Clovis operates the water system to which the Project proposes to connect. This water system meets the standards for a "Public Water System" as set forth in CWC §10912(c); the City is therefore responsible for preparation of the required WSA in accordance with CWC §10910(b).

This WSA discusses the estimated water demands and water supply for the proposed Project. The Project is located in Fresno County (County), adjacent to the City of Clovis (City) limits; the area will be annexed as part of the Project's progress and the entire Project will be supplied water from the City.

1.2 Reliance on a Related Urban Water Management Plan

If the Project falls within the boundaries of a current Urban Water Management Plan (UWMP) prepared by the water purveyor, CWC §10910(c)(1) requires that the WSA determine whether projected water demand associated with the Project is included as part of that duly adopted UWMP.

The 2020 Clovis UWMP covers the SOI for the City. This Project lies within the area north of Shepherd, west of Sunnyside Avenue, within the City's SOI (Provost & Pritchard Consulting Group, 2021). Thus, in accordance with the CWC, the preparers have relied on information from the UWMP wherever possible in preparing the various elements of this Assessment.

1.3 Document Organization

This WSA is organized as follows:

- *Section 2 describes the Project and its location.*
- *Section 3 describes the Project's potable and non-potable water demands in addition to those of other existing and planned uses, and how these vary from the numbers used in the UWMP.*
- *Section 4 provides an overview of the City's primary water supplies.*

- *Section 5 discusses the adequacy of water supplies during normal years.*
- *Section 6 discusses the adequacy of water supplies during single-dry and multiple-dry years.*
- *Section 7 discusses operational reliability on a daily basis.*
- *Section 8 concludes whether supplies would be adequate during normal, dry-year, and multiple-dry years during a 20-year projection.*
- *Section 9 lists references cited in this WSA.*

2 Project Description

2.1 Project Location and Setting

The City limits currently encompasses 25.9 square miles. The City's Sphere of Influence (SOI) covers 34.9 square miles, while the City's General Plan (GP) encompasses approximately 74.3 square miles. The City's General Plan (Placeworks, 2014) identified three Urban Centers to focus growth, including Loma Vista, the Northwest area, and the Northeast area; this Project lies within the Northwest area. **Figure 2-1** identifies the location of the Project in relation to the surrounding Clovis/Fresno region.

The Project would entail development of 590 single-family residential lots on approximately 71.5 gross acres in the Northwest Village. The Project is a proposed Medium High Density Residential (MHDR) development with associated neighborhood green space. The Project site includes 71.5 gross acres bounded by Perrin Avenue and the Enterprise Canal to the south, Behymer Avenue to the north, the Enterprise Canal to the west, and Baron Avenue to the east. The Project site encompasses two parcels, entirely (APNs 556-040-07 and 556-040-08) as well as a portion of parcel 556-030-14. Located just outside the city limits, the area north of the Project is planned to develop to primarily medium density residential, the area east of the Project is developing to very low and medium density residential, the area directly west of the Project is bounded by the Enterprise Canal but directly west of the canal is planned for park facilities, and the area to the south is mainly medium density residential with small areas of park facilities and general commercial.

The Project area is currently designated, in the City's General Plan, as Medium Density Residential and current land uses are rural residential, open fields, and agricultural fields with miscellaneous field crops.

2.2 Water Supply and Distribution

The Project will receive water supply from the City's water distribution system, which relies on both groundwater and surface water supplies. Built in 2004, the City's Surface Water Treatment Plan (SWTP) has a current treatment capacity of 22.5 million gallons per day (MGD); expansion to 45 MGD is planned. In addition to the supply from the SWTP, the City has more than 30 groundwater wells located throughout the City, with the nearest wells being approximately one and a half miles southeast of the Project. While the City's system is divided into two pressure zones, there are interconnections between the two to balance supply and demands throughout the year in various water demand scenarios.

The Project area is entirely within the water system's Pressure Zone 2. Water will be delivered to the Project via the City's existing and planned distribution system. The water distribution system is shown in full in the Water Master Plan Update, Phase III (WMP) (Provost & Pritchard Consulting Group, 2018), and in detail for this area on **Figure 2-2**. Through other projects in the area being undertaken by others, the master-planned infrastructure is being constructed to the south and east of the Project and is assumed it will be complete prior to the water demands associated with this Project being realized. Additionally, the master-planned distribution mains in Shepherd Avenue, between Clovis and Fowler Avenues, and further south and east towards the SWTP exist.

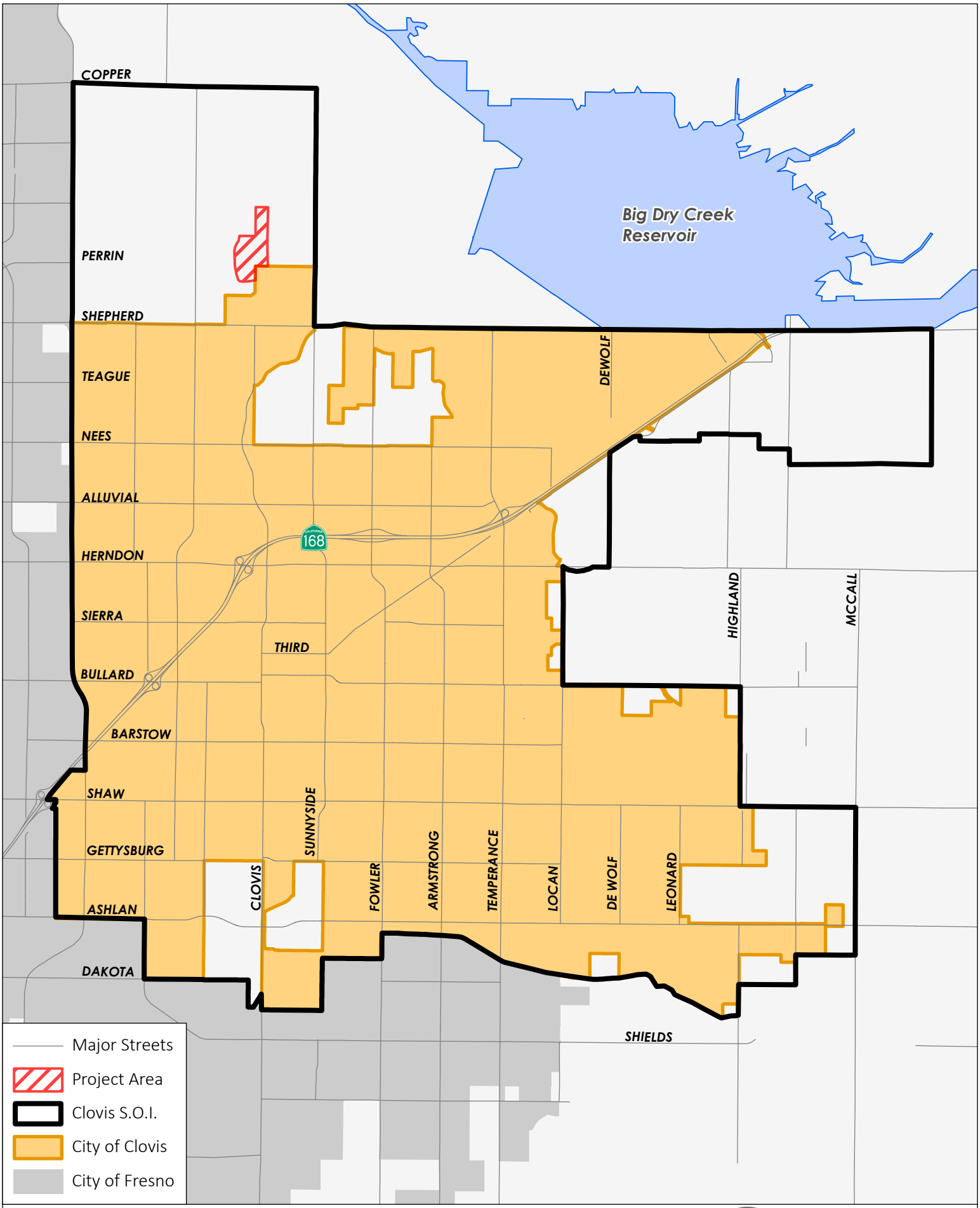

Figure 2-1: Project Location

Water Supply Assessment

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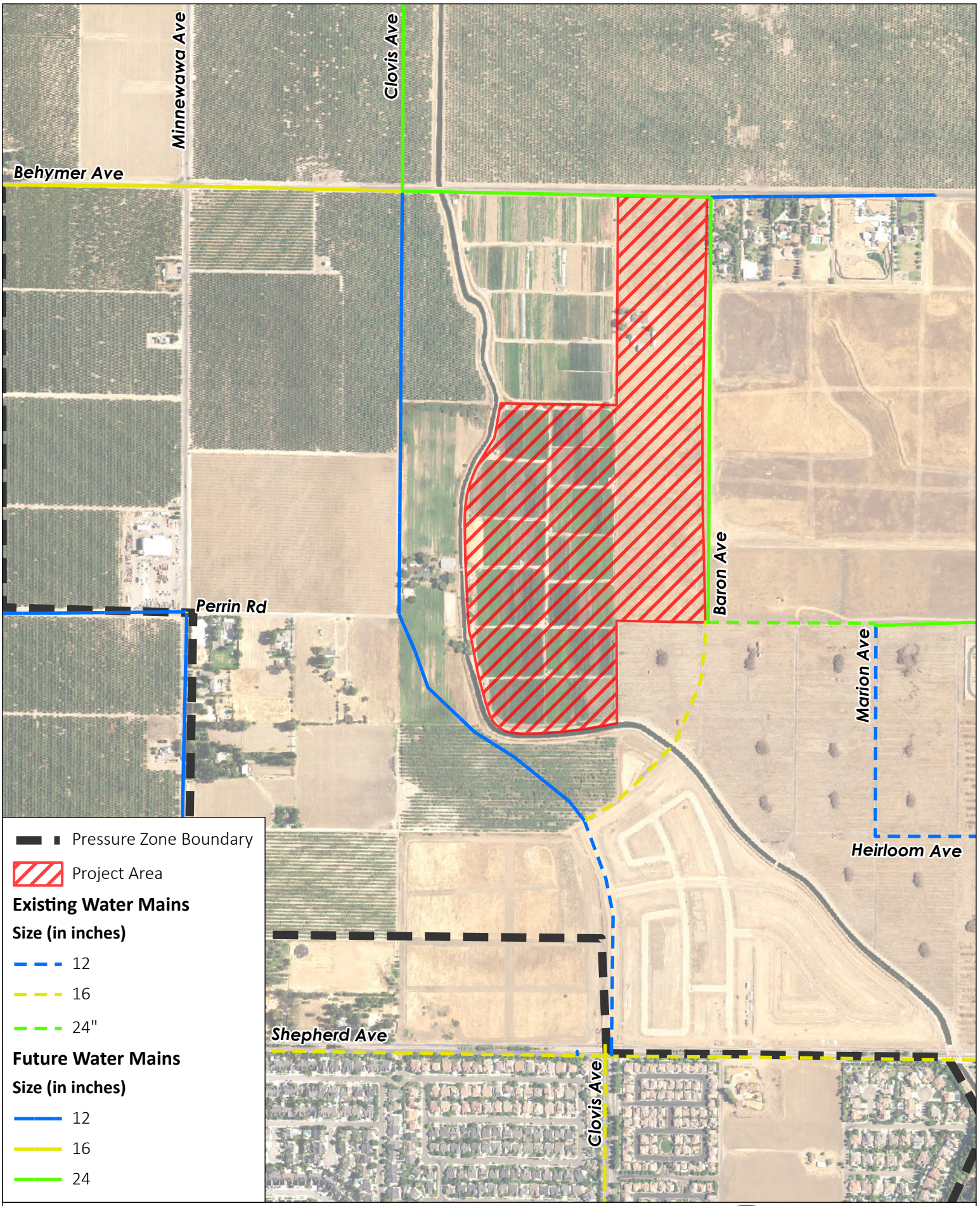

Figure 2-2: Potable Water Infrastructure

Water Supply Assessment

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3 Water Demands

This section summarizes projected water demands of the Project, assuming full buildout of the Project by 2030. Water demands associated with development of the Project area were included in the UWMP and were based on Land Use-based Water Demand Factors (WDFs) applied to land uses shown in the City's adopted General Plan. Proposed Project water demands have been estimated based on the proposed land uses and the WDFs shown in the adopted WMP. This section compares water demand estimates developed as part of this study with the City's earlier plans.

3.1 Project Demands

Based on the adopted WDFs stated in the WMP and the existing GP land use (shown in **Figure 3-1**) designations, the planned water demands, shown in acre-feet per year (AFY), for the Project area are shown in **Table 3-1**.

Table 3-1. Planned Demand Estimates

Planned Land Use Designation	Unit Factor (AFY/acre)	Acreage	Demand (AFY)
Medium Density Residential	2.2	71.5	157.3
Totals:		**71.5**	**157.3**

The proposed water demand estimates for this Project are summarized in **Table 3-2**, based on the proposed land uses and WDF.

Table 3-2. Proposed Demand Estimates

Proposed Land Use Designation	Unit Factor (AFY/acre)	Acreage	Demand (AFY)
Medium High Density Residential	3.3	71.5	236.0
Total:		**71.5**	**236.0**

While the proposed land use is residential, the intensity of the residential development is greater than the GP land uses; therefore, the proposed water demand estimates are greater than the planned estimates. The increase in total water demand for the Project area is 78.7 AFY. This increase is attributable to the proposed MHDR designation having a higher WDF than that of the originally planned, MDR designation. Despite the increase in demands for the Project area, the proposed increase amounts to 0.46% of the excess supply for year 2030 the City has in a normal year as shown in Table 7-2 of the 2020 UWMP[1].

[1] The excess supply in a normal year in 2030 is shown in the UWMP as 16,113 AFY; the total demand planned for the area is 157.3 AFY while the proposed demand is 236.0 AFY, yielding an increased demand of 78.7 AFY or 0.49% of the excess supply (78.7/16113 = 0.49%).

Project water demands were calculated in 5-year increments, as shown in **Table 3-3**, assuming 25 percent of the development by 2025 and the balance by 2030[2].

Table 3-3. Proposed Water Demands in 5-Year Increments

	2025	2030	Total
Estimated Demand (AFY)	59.0	177.0	236.0

3.2 Demands of Other Existing and Planned Development

The UWMP report the planned demands for similar types of uses proposed with this Project within the City, referred to collectively as Single-Family Residential uses (SFR). These demands are summarized in UWMP Table 4-5, which is reproduced, in part, below.

Table 3-4. Planned Water Demands by Use Type

Use Type	UWMP Projected Demands in 2030 (AFY)	Proposed Project Demands in 2030	
		Project Demands (AFY)	% of UWMP SFR Demands
Single-Family Residential	18,558	236.0	1.3%
Totals	**18,558**	**236.0**	**1.3%**

Comparing the total proposed Project water demands in **Table 3-2** with the total water demand area analyzed in the UWMP and shown in **Table 3-4**, the Project makes up a very small portion of the overall water anticipated to be delivered by the City to similar types of uses; however, it is worth note the additional demand beyond the original planned land use (78.7 AFY) accounts for 0.4% of the SRF projected demands shown in the 2020 UWMP for year 2030.

[2] The anticipated demands timing is an estimate and development of the Project will be determined by the Project Applicant. This WSA does not govern the development timeline.

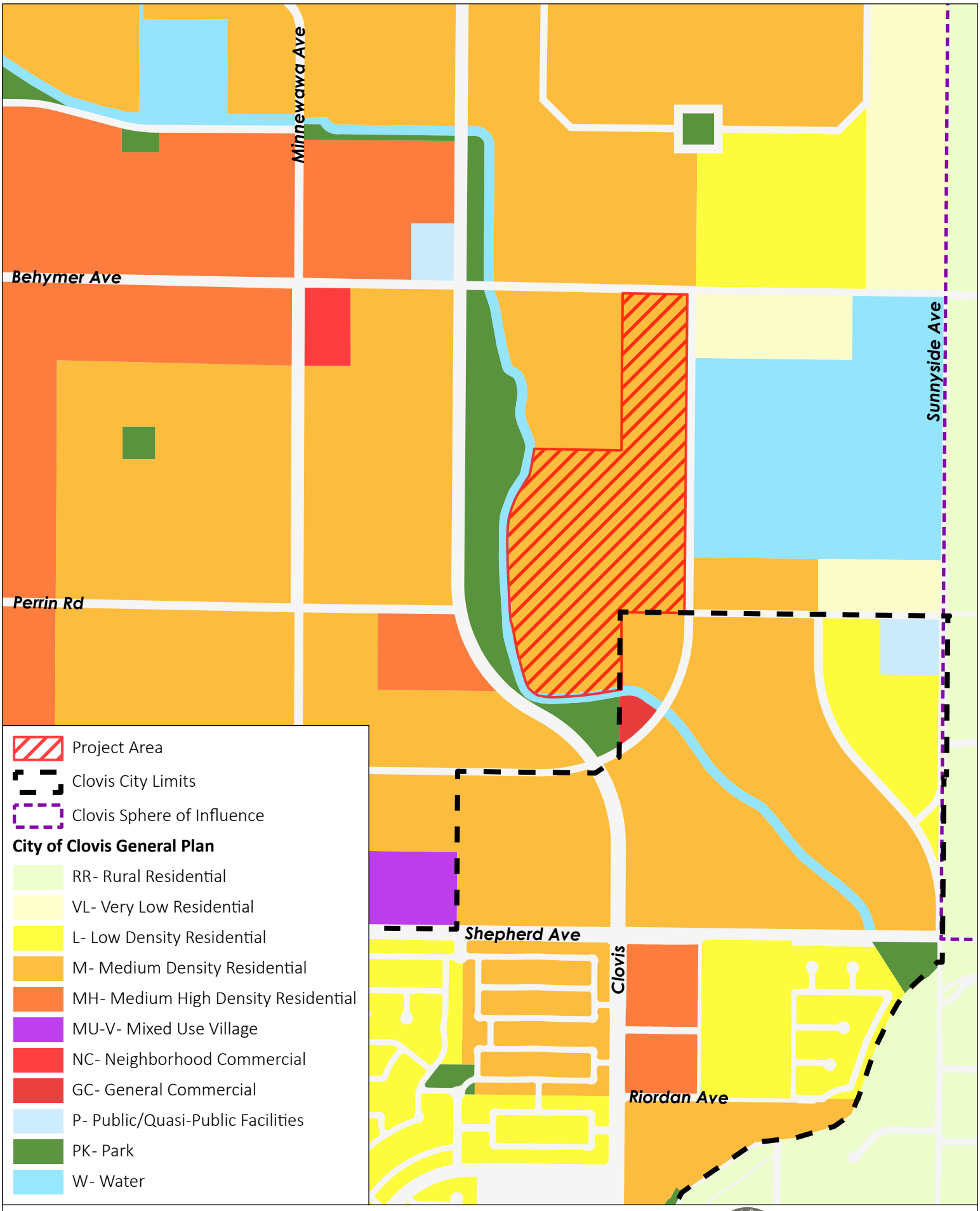

Figure 3-1: Land Use Plan in Project Area

Water Supply Assessment

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4 Overview of Water Supplies

CWC §10910(c)(2) allows reliance on the City's UWMP to determine overall water supply reliability if the Project's planned water demand was included in the UWMP. Although, the proposed Project demand is more than what was included in the calculations for the UWMP, the Project area itself was included at the originally planned land use intensity.

§10910(d) requires that a WSA identify any existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the proposed Project, including any such existing entitlements, rights, or contracts held by the public water system or city or county preparing the WSA. These descriptions appear in detail in Chapter 6 of the UWMP and are summarized below.

4.1 Surface Water

The City's surface water supply is provided through agreements with Fresno Irrigation District (FID), which allows the City to receive a share of FID's Kings River and Friant Central Valley Project (CVP) entitlements. Garfield Water District (GWD) and International Water District (IWD) are located within the City's General Plan boundaries. As the districts' service areas are urbanized over time, surface supplies available to the two districts will be added to the City's surface water supply. As those supplies are added to the City's water supply portfolio, they will be available throughout the City's service area as part of the general water supply. Currently, all surface water available to the City comes from the FID contract. The boundaries of each of the districts are shown on **Figure 4-1**.

4.1.1 Kings River

FID obtains much of its surface water from the Kings River. FID is a member of the Kings River Water Association, which holds water rights licenses for all the Kings River and storage rights licenses on Kings River reservoirs. FID is entitled to water based upon a prorated monthly schedule determined by the natural flow of the Kings River as it would occur without reservoir storage above the historic Piedra gauging station. FID is entitled to water from the Kings River at all flows, but the percentage is higher at relatively low Kings River flows. If the snowmelt is slow, the District receives a greater entitlement. FID's average gross annual entitlement is 452,541 AF. Within the last fifty years, the smallest entitlement received was 158,109 AF, which occurred in 2015.

The City's allocation from the Kings River is proportional to the total acreage of the City's included area to the total FID area receiving water; the total amounts available to the City are discussed in greater detail in Section 6.1.

4.1.2 Central Valley Project Water Allocation: Friant Division

The water obtained from the CVP comes from the diversion and storage of water from the San Joaquin River behind Friant Dam. The total available water on the San Joaquin River has been estimated at 2,200,000 acre-feet (AF). Of that, 800,000 AF have been designated as Class I supply (Bureau of Reclamation, 2005). Class I supply is considered to be dependable in most years with shortages only in

very dry years. Class II water is in excess of Class I and is therefore much less dependable. FID has a contract with the United States Bureau of Reclamation (USBR) for 75,000 AF of Class II water from this source (Bureau of Reclamation, 2005). The agreement between the City and FID requires the District to make available to the City the proportional share of all surface water available to the District although it does not allow the City to directly receive FID's CVP supplies. Therefore, FID is required to make a like amount of Kings River (or any other surface) water available to the City for its proportional share of Class II CVP supplies. FID's Class II contract has received an average 13,577 AFY with the actual number ranging from zero to the full 75,000 AF depending upon the nature of each water year over that period. **Table 4-1** lists the projected surface water volume through 2040.

4.1.3 Garfield Water District

GWD is located north of the City with a portion of the district in the City's SOI. The GWD holds a Class 1 CVP contract for 3,500 AFY. With half of GWD within the City's SOI, an estimated 1,750 AFY is expected to be added to the City's supply upon development. As noted in the UWMP, the first portion of GWD supplies is not anticipated to be available to the City until 2025, with the total 1,750 AFY not accounted for in the supply totals until 2040.

4.1.4 International Water District

IWD is located east of the City's SOI within the general plan's boundary. The IWD holds a Class 1 CVP contract for 1,200 AFY. The City's General Plan designates a portion of the District's area as industrial and residential use. At build-out it is estimated that the entire 1,200 AFY supply will be added to the City's supply. As noted in the UWMP, the first portion of GWD supplies is not anticipated to be available to the City until 2030, with the total 1,200 AFY not accounted for in the supply totals until 2040.

4.2 Supply from Storage

Since 2004, the City has been storing water in the aquifer to create a stable source of supply over the years. The City has been working with FID to recharge surface water, using the City's contracted shares of capacity in FID's Waldron Banking Facility and Boswell Groundwater Banking Facility, to build up credit in those facilities which allows for annual water withdrawals, on an as-needed or as-requested basis. The surface water banked includes portions of FID's Kings and CVP supplies and may in the future also include other surface water supplies that FID is able to secure on the spot market. Recharged water is purchased under separate agreements with FID and is not included in the surface water totals in the previous section, so this is truly a separate and additional water supply. This process is fully explained in the UWMP.

Two banking facilities, the Waldron Banking Facilities (Waldron) and Boswell Groundwater Banking Facility (Boswell), have been constructed in central Fresno County. The City entered into an agreement with the FID to participate in the financing of the construction of a dedicated water banking facility called the Waldron Banking Facilities. The City is entitled to receive up to ninety percent (9,000 AF) of the annual yield. The City and FID have entered into a similar agreement regarding the Boswell Groundwater Banking Facility whereby the City will have access up to 4,500 AFY of surface water. The

recharged water will be "banked" for future recovery during dry periods or to accommodate planned growth.

The City has created a recharge plan accounting for historic variations in surface water supplies that will allow it to withdraw an annual 13,500 AF, the maximum withdrawal allowed under the City's agreements with FID. This is considered a firm supply. The 13,500 AF maximum annual withdrawal is built into the water supply projections in the UWMP for each year over the planning horizon.

4.3 Groundwater

The City is located within the Kings Groundwater sub-basin, a part of the Tulare Lake Hydrogeologic Basin as described in the Department of Water Resources Bulletin 118 (Department of Water Resources, 2003). The groundwater basin is in overdraft and has been for many years. However, it has not been adjudicated.

Chapter 6 of the UWMP discusses a sustainable groundwater yield for the service area and concludes the sustainable yield to be 9,400 AFY, as discussed in greater detail in the WMP. While the North Kings Groundwater Sustainability Plan (NKGSP) has been written and adopted, it does not yet include a firmer approximation of sustainable yield, although development of one is anticipated. The sustainable yield from the UWMP and WMP has been used for this assessment.

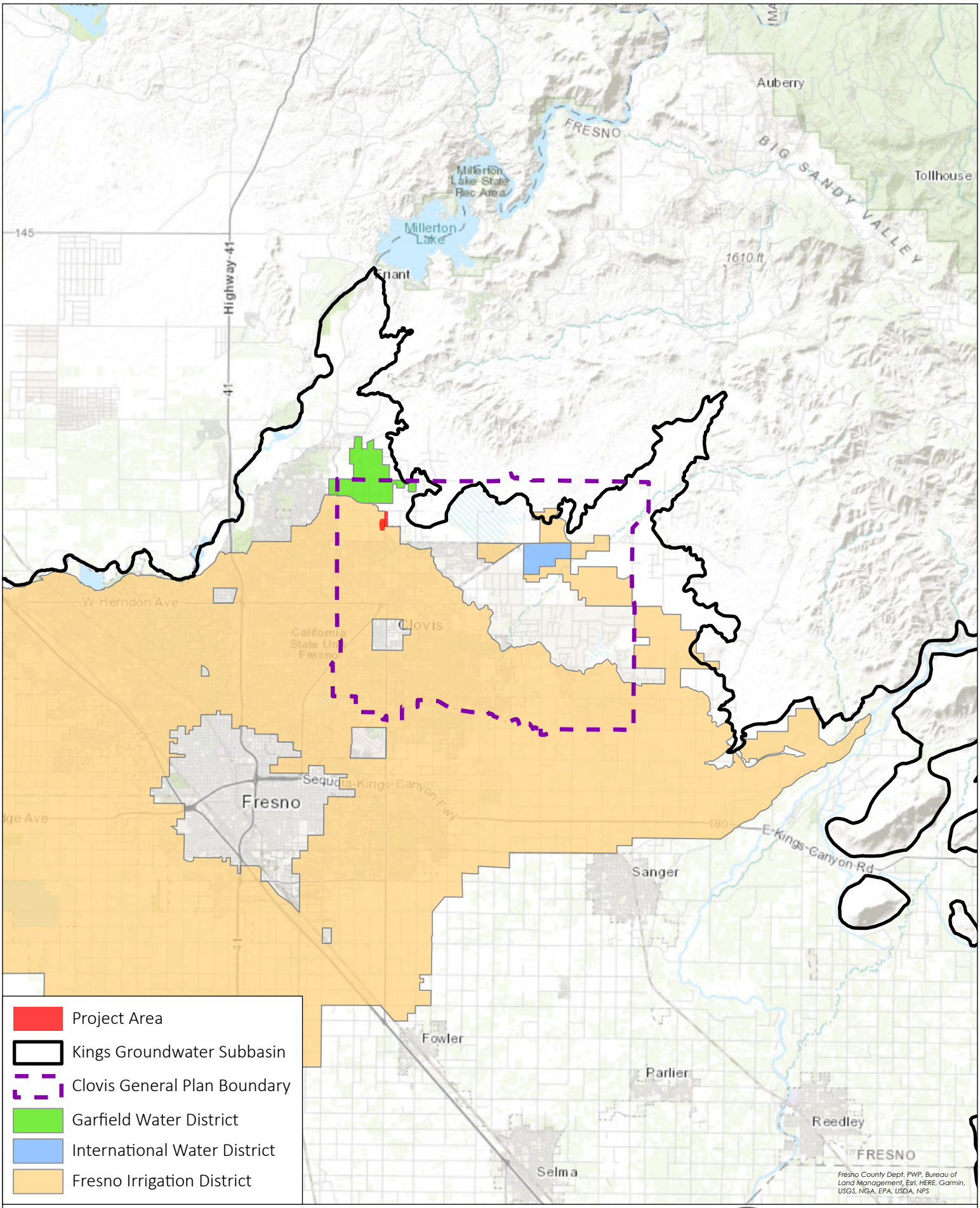

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Figure 4-2: Irrigation and Water Districts

Water Supply Assessment

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4.4 Recycled Water

Most of the City's wastewater flow is treated at the Regional Water Reclamation Facility (RWRF), located southwest of the City of Fresno on Jensen Avenue. In 2009, the City of Clovis completed a new Water Reclamation Facility (WRF). In 2020, the WRF produced approximately 2,496 AFY. Of that total, 28 percent was recycled for mostly landscape and agricultural irrigation, with the remainder being discharged to FID's Fancher Creek for agricultural irrigation.

Ultimately the WRF will be expanded to be able to treat 8.4 MGD, or 9,400 AF per year, and will make a substantial contribution to the City's overall water resources. According to the 2020 UWMP, recycled water is used for irrigation of public and private landscape within the service area. Areas receiving or planned to receive recycled water include the Freeway 168 corridor between Shepherd and Sierra Avenues, the existing Clovis Community Medical Center campus, and multiple City parks and landscape areas.

Landscape irrigation will continue to be the main use of recycled water in the future. All public landscape areas within three-quarters of a mile of the distribution system are considered potential recycled water use areas. Clovis Unified School District is evaluating the use of recycled water for its landscape areas. Caltrans has expanded their use of recycled water along State Route 168 from Armstrong Avenue west to Sierra Avenue. Concurrent with the Project's development, the City will expand its use of recycled water and broaden its range of beneficial uses to potentially include irrigating the public landscape space to be developed with the Project.

To affect that increase in use, the City now requires all new development of public landscape near recycled water transmission lines to use recycled water. Additional actions include extending the recycled water distribution system to discharge at groundwater recharge facilities and reducing the cost of recycled water. The UWMP indicates planned use of recycled water supply will be 9,400 AFY by 2040 (UWMP Table 6-13). With a planned[3] recycled water transmission main in Shepherd Avenue, it is possible this Project may use recycled water for landscape irrigation, but the City will make final determination of that at a later date.

4.5 Exchanges

Water exchanges, transfers, and water banking allow purveyors to manage demand and supply variability by ensuring water will be available for the near future. The majority of the City's wastewater is treated at the RWRF. Under an agreement with FID, the City of Fresno receives 0.92 AF of Kings River surface water in exchange for each two AF of reclaimed water produced by the RWRF (46 percent exchange). Clovis is in discussions with the City of Fresno and FID on documenting its pro-rata share of RWRF effluent and the most efficient recover and beneficial use of that effluent. This will require a new effluent exchange agreement with FID, and potentially the City Fresno, to appropriately allocate Clovis' pro-rata share of the treated water. This water is limited by agreement to being used for groundwater recharge activities.

[3] As noted in the City's 2018 Recycled Water Master Plan

4.6 Water Supply Summary

The five sources discussed above make up the City's water resources. These are tabulated overall for 2025 and for each subsequent 5-year period through 2040 in **Table 4-1**.

The City's overall water resources are projected to increase from 50,739 AF per year in 2025 to 74,650 AF per year in 2040. Nearly all this increase will come from increasing surface water resources from 18,039 AF per year in 2020 to 39,400 AF per year in 2040. The mix of water supplies the City plans to use to meet these demands is changing over time and, while the surface water supplies will be the primary source, a mixture of groundwater and supply from storage will be used to meet demands.

Table 4-1. Water Supplies – Normal Year (UWMP Tables 6-12 and 6-13)

Water Supply	Projected Water Supply (AF)			
	2025	2030	2035	2040
Groundwater [1]	11,429	10,753	10,076	9,400
Surface Water [2]	22,160	27,584	32,508	39,400
Supply from Storage (Waldron and Boswell facilities)	13,500	13,500	13,500	13,500
Recycled Water	3,100	5,500	6,300	9,400
Transfers (GWD and IWD)	550	1,600	2,650	2,950
Total	**50,739**	**58,937**	**65,034**	**74,650**

Notes:

[1] Reasonably available volume shows a steady reduction in reliance on groundwater supply, as planned, to the sustainable yield volume in 2040; discussed in greater detail in the UWMP.

[2] Surface water quantities shown in greater detail in the UWMP.

5 Normal Year Water Operations

This section evaluates the ability of the City to meet the overall water demands during normal water years. A normal year is a year, or averaged range of years, that most closely represents the average water supply available to the City. In this case, the normal year reflects the overall water supply summary discussed in Section 4.

This Chapter relies on information taken from Sections 6 and 7 of the UWMP. **Table 5-1** compares the City's water demands and compares them with the normal year water supplies (see **Table 4-1**) for the 5-year increments the Project is anticipated to be constructed, and through 2040, as shown in the UWMP. As shown, total supplies would exceed total demands. Adequate supplies are available to serve the City and its water customers in normal rainfall years such as those discussed in this section. The excess water supply is more than adequate to meet the estimated Project water demands.

Table 5-1. Comparison of Normal Year Supplies and Demands

Condition	Water Supply (AFY)			
	2025	2030	2035	2040
Water Demand	39,737	42,824	46,422	52,598
Water Supply	50,739	58,937	65,034	74,650
Excess/Shortage	**11,002**	**16,113**	**18,612**	**22,052**

6 Single-Dry and Multiple-Dry Year Water Supplies

This section evaluates the availability of City water supplies during single-dry and multiple-dry water years, based on Project buildout in 2030. Numerous factors will work to change the relative quantities of water the City receives from its several water sources. Since each of these has a different reliability in dry years, the overall water supply reliability will change over time. The following sections discuss how this will occur.

During a single-dry year, surface water allotments are anticipated to be reduced by as much as 66 percent for Kings River surface water supplies, and CVP Class II supplies are eliminated completely in dry years. In the future, as the City becomes more reliant on surface water supplies, the impact of surface water reductions in dry years will be more significant.

A multiple-dry year period represents the lowest average supply available to the Project for a consecutive five-year period. This analysis is referred to as a "multi-dry" condition in the UWMP. The WSA analysis is based on the five consecutive driest years of record for the Project's surface water supplies, which were water years 2011/12 through 2015/16.

6.1 Water Year Effects on Water Sources

6.1.1 Kings River Surface Water

Both the single-dry and multiple-dry analyses are most affected by the variations in Kings River entitlement in dry years. FID's entitlement does not vary directly in proportion to overall annual runoff; rather it favors FID versus all the other Kings River diverters. When river flows are low due to slow runoff, low annual precipitation or both, FID's proportional share of the daily river flow increases.

The effect of this is that FID's entitlement, as a percentage of its average entitlement, is higher than the overall water year percentage flow, for virtually any below-average water year. As noted in the UWMP, the anticipated share of Kings River water is shown as 32,100 AFY (UWMP Table 6-4) in 2040 for an average water year. As discussed in the UWMP, the City has recently executed a contract with FID for development of a new firm water supply starting at 1,000 AFY in 2020 and increasing to a maximum of 7,000 AFY by 2045 and thereafter. This new supply will not have the variability of the existing supply based on water year type.

6.1.2 Friant CVP Surface Water

Over the period of 1986 through 2016, the average Class II allocation has been 38 percent of contracted amount. However, Class II supplies are particularly subject to the water year type. However, these supplies are relatively small and would not have significant impact on the total supply.

While Class I entitlements do not currently affect the City's FID supplies, they will affect the future-year GWD and IWD entitlements. Class I allocations in the five multiple-dry years were 0 percent of the contracted amount for all five years.

6.1.3 Supply from Storage

The contract for the Waldron facility allows annual withdrawals of up to approximately 9,000 AFY, while the Boswell Facility allows up to 4,500 AFY. According to the UWMP, the combined withdrawal limit from the two facilities is 13,500 AFY. In any year where surface water deliveries are substantially limited, the City would want to use these resources to the limit.

A related matter is how contributions are made to supply storage. Whereas in normal years the City is making deposits to both facilities, in a drier year those contributions would be reduced or halted since the surface supplies necessary for the deposits would not be available. Since the deposits come from surface water resources not counted in the City's water balance, being acquired under separate FID agreements, the curtailment of deposits does not reduce the City's water demand.

6.1.4 Groundwater

As of the preparation of the 2020 UWMP, the City of Clovis obtains groundwater from more than 30 wells, located throughout the service area. The total well production is estimated at 37,290 gallons per minute (gpm).

According to the UWMP, the City aims to reduce its direct groundwater consumption whenever possible. Most the City's water demands will be met by a combination of surface water and supplies from storage, in water years when those two resources are sufficient to meet demands. In drier years, when surface water supplies are limited, the City will pump groundwater, potentially beyond the 9,400 AFY accounted for in a normal year, to make up the shortfall but not to an unsustainable level as discussed in the NKGSP. The City will also recharge surface waters when available to allow for additional groundwater pumping when needed.

Planning to make that objective possible is very important, as Chapter 6 of the UWMP states that the sustainable groundwater supply in the City service area is 9,400 AF per year, for normal, dry, and multi-dry years. For the time being, there is no restriction against pumping groundwater above the sustainable aquifer yield; however, the NKGSP indicates the City must sustainably use groundwater.

This WSA uses 9,400 AF per year as the sustainable groundwater pumping amount, as stated in the UWMP. Due to the very large size of the aquifer underlying the City, available groundwater is not quickly affected by the type of water year. Anticipating a mix of wet and dry years similar to what has been historically seen, this WSA does not reduce available groundwater in dry or multiple-dry years; however, the City will be prioritizing use of other supplies over groundwater when possible.

6.1.5 Recycled Water

Recycled water production, being tied directly to indoor water use, does not vary significantly with the water year type, and is not adjusted from normal for this analysis.

6.2 Changes in Water Source Reliability Over the Planning Horizon

In 2020, surface water made up 58 percent of the City's direct water supply. In 2030, the surface water supply is planned to be 53 percent of the total while the supply from storage will have increased to 18 percent in a normal year. Groundwater will remain an important component of the water supply in the near future.

This means the City's reliance on surface water supplies, either directly used or pumped from subsurface storage, will have increased to 71 percent of the total. While there is a margin of normal year supply available over planned demand over the entire planning horizon, some provision may have to be made for additional reliable storage to account for such a large portion of surface water being subject to water year variability. See the reliability analysis in Section 6.3 following.

6.3 Summary of Single-Dry and Multiple-Dry Year Reliability Over the Planning Horizon

Supply for dry years would be drawn from a combination of Kings River surface water, supply from storage, groundwater, and recycled water. As shown in the UWMP, it is anticipated that surface water supplies from the FID Firm Water Agreement would still be available during drought years. Other firm water supply sources are groundwater, banked water, and recycled water, all of which are considered resilient against drought compared to surface water supplies. Groundwater banking activities would decrease to accommodate the decreased surface water supplies while still being able to use previously banked groundwater supplies from the Waldron and Boswell facilities. Project demand was assumed to be constant across all water years.

The supplies that would be available during single-dry and multiple-dry years in 2030 (at assumed Project buildout) are summarized in **Table 6-1**. As shown, adequate supplies would be available to supply the City and along with the estimated Project demand of 236 AFY, under all studied conditions. Further, the excess demand associated with the Project (78.7 AFY), over the originally planned land use, accounts for 10.3 percent of the excess supply without conservation and 1.3 percent of excess supply with conservation in the most critical year analyzed – the Single Dry Year. The City has a Water Shortage Contingency Plan (WSCP) (Provost & Pritchard Consulting Group 2021) in place that could be partially or fully implemented if needed or mandated. The 'demand with conservation' values are reduced to reflect implementation of various stages of the WSCP, as discussed in the UWMP.

Table 6-1. Dry Year Supply and Demand Comparison in 2030 (UWMP Tables 7-2, 7-3, and 7-4)

Scenario	Single-Dry Year [1]	Multiple-Dry Year [2]				
		Year 1	Year 2	Year 3	Year 4	Year 5
Baseline demand	42,824	42,824	42,824	42,824	42,824	42,824
Demand with Conservation as shown in UWMP	37,359	39,422	36,962	33,969	30,474	40,757
Total Supply	43,587	54,607	52,576	48,310	43,586	57,992
Excess/<Deficit> in Supply	**763**	**11,783**	**9,752**	**5,486**	**762**	**15,168**
Excess/<Deficit> in Supply with Conservation	**6,228**	**15,185**	**15,614**	**14,341**	**13,112**	**17,235**

Note: Refer to the 2020 UWMP for details on how these values were calculated.

6.4 Climate-Based Reliability Factors

This WSA defers to the UWMP for consideration of the overall effects of climate change upon supply reliability. Climate change has been considered in the preparation of the UWMP.

7 Operational Reliability

The City's surface water entitlement does not accrue all at once during a given water year. Rather, the Kings River entitlement accrues daily throughout the year based on actual river runoff and the Kings River Water Association (KRWA) entitlement schedule. The daily nature of the Kings River supply is especially important early in the water year, which begins October 1. The very low river flows in October and November mean that supply is low, and the City must rely on other water supplies during those months. The relatively large supplies available from storage help mitigate the seasonal nature of the surface water supply, and these are further backed up by groundwater supplies equivalent to almost half the City's total annual demand.

The City has not had any issue with temporary water shortages to date. The City's WMP and UWMP indicates a need to increase their surface water and groundwater supplies to meet future demands and provides detail on how much of each supply is needed compared to the existing supplies. The WMP also includes a Capital Improvements Program identifying capital projects that are necessary to acquire and facilitate the movement of current and future water supplies throughout the City's system in a reliable manner. The City's adherence to their planning documents and consistent development of these water supplies and infrastructure is critical for the City's continued growth and development and will provide operational reliability into the future.

8 Conclusions

As summarized in **Table 8-1**, the City has adequate supplies to meet the needs of all the City's water customers including the Project, in normal water years, over the 20-year planning horizon.

In the buildout year, if demand is as projected, the City will have sufficient water to meet dry year demands of all dry year event types. Conservation measures, detailed in the Water Shortage Contingency Plan, have been developed that would mitigate possible shortfalls by reducing demand approximately 15 percent. Evidence from the 2013 to 2015 drought suggests that those results, and more, are achievable. Additionally, as the City has surplus water supplies in normal years, short-term additional groundwater extraction in the single-dry and multiple-dry years is also planned as part of their water portfolio.

As discussed in Section 7, the City has plans to continue to acquire water supplies and construct infrastructure to supply current and future water users. Therefore, we conclude the City of Clovis has adequate water supplies to meet the needs of the City including additional demands associated with this Project in normal, dry, and multi-dry years given the previously discussed potential demand reductions and supply augmentations.

8.1 Conclusions Including Additional WSAs

Since the 2020 UWMP was adopted, three WSAs have been prepared for the City, including this one. It is important to understand the cumulative impact of the additional demands associated with WSAs over and beyond the demands analyzed in the 2020 UWMP.

Table 8-1. Summary of Project Water Supplies and Demands including WSAs

2020 UWMP Supply and Demand Comparison Results	Normal Year (2030)	Single-Dry Year	Multiple-Dry Year				
			Year 1	Year 2	Year 3	Year 4	Year 5
Excess/<Deficit> in Supply	16,113	763	11,783	9,752	5,486	763	15,168
Excess/<Deficit> in Supply with Conservation	--	6,228	15,185	15,614	14,341	13,112	17,235
Additional Demands Associated with WSAs prepared since 2020 UWMP							
Home Place Master Plan (Approved March 2021)	No Additional Demands Associated with Home Place Master Plan WSA						
Tract 6205 SOI Expansion (Estimated Approval 2022)	256	256	256	256	256	256	256
Tract 6343 (Estimated Approval 2022)	79	79	79	79	79	79	79
Excess/<Deficit> in Supply including Additional Demands from WSAs	**15,779**	**429**	**11,449**	**9,418**	**5,152**	**428**	**14,834**
Excess/<Deficit> in Supply with Conservation including Additional Demands from WSAs	**--**	**5,944**	**14,901**	**15,330**	**14,057**	**12,828**	**16,950**

The demands in **Table 8-1** include those demands noted in the UWMP, the additional demands associated with the Project evaluated in this WSA (78.7 AFY), as discussed in Section 2.2, and the additional demands discussed in the previously prepared WSAs. Similarly, the noted Excess/Deficit reflects the difference between these summated demands and the total supply noted in the UWMP. This approach accounts for the additional demands associated with the proposed land use type above the demands associated with the originally planned land use type. There is still an excess of supply in all conditions, even with the additional demands.

As noted above, additional groundwater supplies may not be necessary in the critical year or multiple year drought depending on operational decisions regarding conservation; however, the City's UWMP notes additional groundwater supplies would be available on a short-term basis during a drought condition.

9 References

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