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Vista Ranch Project
REVISED DRAFT
Environmental Impact Report

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAM	annual arithmetic mean
AAQA	Ambient Air Quality Analysis
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACC II	Advanced Clean Cars II
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ACP	Alternative Compliance Plan
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
AERMAP	EPA Terrain Preprocessor
AERMOD	American Meteorological Society/EPA Regulatory Model
AF	acre-feet
AFY	acre-feet/year
AIA	Airport Influence Area
AIC	Archaeological Information Center
AICUZ	Air Installation Compatibility Use Zone
AD	Approved Jurisdictional Determination
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Commission Compatibility Plan
AMM	Avoidance and Minimization Measure
AMSL	above mean sea level
APCD	Air Pollution Control District
APE	Area of Potential Effect
APN	Assessor’s Parcel Number
AQMD	Air Quality Management District
AQP	Air Quality Plan
ARB	California Air Resources Board
AST	aboveground storage tank

ASTM	American Society of Testing and Materials
ATCM	Airborne Toxic Control Measures
ATP	Active Transportation Plan
BART	Bay Area Rapid Transit
BAU	business-as-usual
Bay Area Air District	Bay Area Air Quality Management District
BCF	billion cubic feet
BCF/year	billion cubic feet per year
BGBF	Boswell Groundwater Banking Facility
BMP	Best Management Practice
BO	Biological Opinion
BP	Before Present
BRA	Biological Resources Assessment
BRE	biological resources evaluation
BRIC	Building Resilient Infrastructure and Communities
BTU	British Thermal Units
BUOW	burrowing owl
BVOC	biogenic volatile organic compound
C^2ES	Center for Climate and Energy Solution
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
Cal-ARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Buildings Code
Cal-IPC	California Invasive Plant Council
Cal/OSHA	California Occupational Health and Safety Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARE	Community Air Risk Evaluation
CBC	California Building Standards Code
CBSC	California Building Standards Commission

CCAA	California Clean Air Act
CCCC	California Climate Change Center
CCR	California Code of Regulations
CDF	California Department of Finance
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
Central Valley RWQCB	Central Valley Regional Water Quality Control Board
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	chlorofluorocarbon
CFD	Clovis Fire Department
CFR	Code of Federal Regulations
CGS	California Geological Survey
CGYM	Clean Green Yard Machines
CH_4	methane
CHL	California Historical Landmarks
CHP	California Highway Patrol
CHRIS	California Historical Resources Information System
CI	compression ignition
CID	Consolidated Irrigation District
CMC	City of Clovis Municipal Code
CMP	Congestion Management Process
CMUTCD	California Manual on Uniform Traffic Control Devices
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	Compressed Natural Gas
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CNT	Center for Neighborhood Technology
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
COA	Condition of Approval
COG	Council of Governments
CPF	cancer potency factor

CPHI	California Points of Historical Interest
CPUC	California Public Utilities Commission
CRA	Cultural Resources Assessment
CREC	Controlled Recognized Environmental Condition
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CRS	Community Rating System
CTR	California Toxics Rule
CTS	California tiger salamander
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CUSD	Clovis Unified School District
CVP	Central Valley Project
CVRWQCB	Central Valley Regional Water Quality Control Board
CWA	Clean Water Act
CWC	California Water Code
dB	decibel
dBA	A-weighted decibel
dBA/DD	dBA per each doubling of the distance
DBCP	dibromochloropropane
DBH	diameter at breast height
Delta	Sacramento-San Joaquin Delta
DEM	Digital Elevation Model
DPM	diesel particulate matter
DPS	Distinct Population Segment
DSOD	Division of Safety of Dams
DTSC	California Department of Toxic Substances Control
du/acre	dwelling units per acre
DUC	Disadvantaged Unincorporated Communities
DWR	California Department of Water Resources
EAP	Emergency Action Plan
EDD	California Employment Development Department
EDF	Environmental Defense Fund
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act of 2007
EMFAC	EMission FACtors mobile source emissions model

EMS	Emergency Medical Services
EO	Executive Order
EOP	Emergency Operations Plan
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
ESMP	Environmental Site Management Plan
eTRIP	Employer Trip Reduction Implementation Plan
FAA	Federal Aviation Administration
FAR	floor area ratio
FAX	Fresno Area Express
FCEHS	Fresno County Department of Public Health, Environmental Health System
FCFPD	Fresno County Fire Protection District
FCRTA	Fresno County Rural Transit Agency
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FGC	Fish and Game Code
FHSZ	Fires Hazard Severity Zone
FHWA	Federal Highway Administration
FID	Fresno Irrigation District
FIRM	Flood Insurance Rate Map
FMA	Flood Mitigation Assistance
FMFCD	Fresno Metropolitan Flood Control District
FMMP	Farmland Mapping and Monitoring Program
FPP	Farmland Preservation Program
FPPA	Farmland Protection and Policy Act
FRA	Federal Responsibility Area
FRAP	Fire and Resource Assessment Program
Fresno COG	Fresno Council of Government
FTA	Federal Transit Administration
gal/bhp-hr	gallons per brake horsepower-hour
GAMAQI	Guidance for Assessing and Mitigating Air Quality Impacts
GHG	greenhouse gas
GLO	General Land Office
gpm	gallons per minute
GPS	Global Positioning System
g/s	grams per second

GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
GWD	Garfield Water District
GWh	gigawatt-hours
GWh/y	gigawatt-hours per year
GWP	global warming potential
HABS	Historic American Building Survey
HAP	Hazardous Air Pollutants
HBC	Helm Biological Consulting
HCD	California Department of Housing and Community Development
HCM	Highway Capacity Manual
HCP	Habitat Conservation Plan
HFC	hydrofluorocarbon
HHDT	heavy heavy-duty truck
HI	hazard index
HIA	acute hazard index
HIC	chronic hazard index
HMBP	hazardous materials business plan
HMGP	Hazard Mitigation Grant Program
HMP	Hazard Mitigation Plan
HOA	homeowner's association
HOV/HOT	High Occupancy Vehicle/High Occupancy Toll
hp	horsepower
HRA	Health Risk Assessment
HREC	Historical Recognized Environmental Condition
HRI	California Historic Resources Inventory
HSC	California Health and Safety Code
HUC	hydrologic unit code
HVAC	heating, ventilation, and air conditioning
HWCL	Hazardous Waste Control Law
IA	Implementing Agreement
IFI	Important Farmlands Inventory
in/sec	inches per second
IOU	investor-owned utilities
IPCC	United Nations Intergovernmental Panel on Climate Change
ISR	Indirect Source Review

ISTEA	Intermodal Surface Transportation Efficiency Act
ITP	Incidental Take Permit
IWD	International Water District
km/h	kilometers per hour
KRCD	Kern River Conservation District
kW	kilowatts
LAFCo	Local Agency Formation Commission
lb	pounds
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LCI	California Governor's Office of Land Use and Climate Innovation
L_{dn}	day/night average sound level
LED	light-emitting diode
L_{eq}	equivalent sound level
LESA	Land Evaluation and Site Assessment
LEV	low-emission vehicle
LID	Low Impact Development
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	Level of Service
LRA	Local Responsibility Area
LSE	load-serving entities
LSI	large spark-ignition
LSS	Limited Subsurface Survey
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MDBM	Mount Diablo Base and Meridian
MEIR	Maximally Exposed Individual Resident
mgd	million gallons per day
mg/L	milligrams per liter
MHDT	medium heavy-duty truck
MLRSP	Multi-jurisdictional Local Road Safety Plan
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MP	Master Plan

MPC	Master Plan Community
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MRP	Municipal Regional Stormwater NPDES Permit
MRZ	Mineral Resource Zone
MSR	Municipal Services Review
MS4	Municipal Separate Storm Sewer System
MT	metric ton
MTBE	methyl tert-butyl ether
MTS	Metropolitan Transportation System
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWELO	California Model Water Efficient Landscape Ordinance
MXD	mixed-use development
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCFPD	North Central Fire Protection District
NEHRP	National Earthquake Hazards Reduction Program
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NEUC	Northeast Urban Center
NEV	Neighborhood Electric Vehicle
NF_3	nitrogen trifluoride
NFIP	National Flood Insurance Program
NFPA	National Fire Protection Association
NHM	Natural History Museum of Los Angeles County
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NKGSA	North Kings Groundwater Sustainability Agency
NO_2	nitrogen dioxide
NOAA Fisheries	National Marine Fisheries Service
NOC	Notice of Completion
NOP	Notice of Preparation

NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTR	National Toxics Rule
NWI	National Wetlands Inventory
NWIC	Northwest Information Center
NWPT	Northwestern Pond Turtle
O&M	Operations and Maintenance
O_3	ozone
OAL	Office of Administrative Law
OEHHA	California Office of Environmental Health Hazard Assessment
OES	California Office of Emergency Services
OHWM	ordinary high water mark
ONAC	Federal Office of Noise Abatement and Control
OSHA	Occupational Safety and Health Administration
PA	Planning Area
PCB	polychlorinated biphenyl
pCi/L	picocuries per liter
PDM	Pre-Disaster Mitigation
PEC	Potential Environmental Concern
PFC	perfluorocarbon
PG&E	Pacific Gas and Electric Company
Phase I ESA	Phase I Environmental Site Assessment
PHEV	plug-in hybrid electric vehicles
PJD	Preliminary Jurisdictional Determination
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PM_x	particulate matter
ppb	parts per billion
ppm	parts per million
ppt	parts per trillion
PPV	peak particle velocity
PRC	Public Resources Code
PROWAG	Public ROW Accessibility Guidelines

psi	pounds per square inch
PV	photovoltaic
PVC	polyvinyl chloride
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RACM	regulated asbestos-containing materials
RCRA	Resource Conservation and Recovery Act of 1976
REC	Recognized Environmental Condition
Recology	Integrated Resource Recovery Company
REL	Reference Exposure Level
RHNA	Regional Housing Needs Allocation
RMP	Risk Management Plan
rms	root mean square
ROG	reactive organic gases
RPS	Renewables Portfolio Standard
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
RWRF	Fresno-Clovis Regional Wastewater Reclamation Facility
RWTP	Regional Wastewater Treatment Plant
SARA Title III	Emergency Planning and Community Right-to-Know Act
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCU	Santa Clara Unit
sf	square feet
SF_6	sulfur hexafluoride
SFPUC	San Francisco Public Utilities Commission
SGMA	Sustainable Groundwater Management Act
SIL	significant impact level
SIP	State Implementation Plan
SJKF	San Joaquin kit fox
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SJVRR	San Joaquin Valley Railroad
SMARA	Surface Mining and Reclamation Act
SO_2	sulfur dioxide
SoCalGas	Southern California Gas Company

SOI	Sphere of Influence
SORE	Small Off-road Engine
SO_X	sulfur oxide
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
SRA	State Responsibility Area
SSC	Species of Special Concern
SSJVIC	Southern San Joaquin Valley Information Center
State Water Board	California State Water Resources Control Board
STORMS	Strategy to Optimize Management of Storm Water
ST-WRF	Sewer Treatment–Water Reuse Facility
SWPPP	Storm Water Pollution Prevention Plan
SWQMP	Storm Water Quality Management Program
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TBACT	best available control technologies for toxics
TCM	Transportation Control Measure
TDM	Transportation Demand Management
TCP	trichloropropane
TDS	total dissolved solids
TDV	Time Dependent Valuation
TEA-21	Transportation Equity Act for the 21st Century
Tg	teragram
therms/y	therms per year
TIA	Traffic Impact Analysis
TIS	Traffic Impact Study
TMA	Transportation Management Association
TMDL	Total Maximum Daily Load
TOD	Transit Oriented Development
tpy	tons per year
UBC	Uniform Building Code
UCR	Uniform Crime Reporting
UFC	Uniform Fire Code
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture

USDOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UTM	Universal Transverse Mercator
UWMP	Urban Water Management Plan
V/C	volume to capacity ratio
VDECS	Verified Diesel Emission Control Strategies
VERA	Voluntary Emission Reduction Agreement
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
Vollmar	Vollmar Natural Lands Consulting
VPFS	vernal pool fairy shrimp
WBF	water banking facility
WEAP	Worker Environmental Awareness Program
WDR	Waste Discharge Requirements
WQMP	Water Quality Management Plan
WQO	water quality objectives
WSA	Water Supply Assessment
WSCP	Water Shortage Contingency Plan
WWTP	Wastewater Treatment Plant
ZEV	Zero-Emission Vehicle

EXECUTIVE SUMMARY

Purpose

This Revised Draft Environmental Impact Report (Revised Draft EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the Vista Ranch Project (State Clearinghouse No. 2023100508). This document is prepared in conformance with CEQA (Public Resources Code [PRC] § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et seq.*).

The purpose of this Revised Draft EIR is to inform decision-makers, representatives of affected and responsible agencies, the public, and other interested parties of the potential environmental effects that may result from implementation of the proposed project. This Revised Draft EIR describes potential impacts relating to a wide variety of environmental issues and methods by which these impacts can be mitigated or avoided. This Revised Draft EIR provides a project-level analysis of the environmental effects of the Vista Ranch Development and a program-level analysis of the Sphere of Influence (SOI) Expansion and Master Plan (MP) Area 2.

Project Summary

Project Location

The project site (hereby referred to as the SOI Expansion Area) is located directly north of the City of Clovis city limits, in unincorporated Fresno County (County) (Exhibit 2-1). The SOI Expansion Area consists of approximately 952 acres located within the City's Planning Area and is bound on the north by East Behymer Avenue, on the east by the Big Dry Creek Reservoir, on the south by East Shepherd and East Perrin Avenues, and on the west by North Fowler and North Sunnyside Avenues (Exhibit 2-2). The SOI Expansion Area is located within portions of Sections 21, 22, and 23 of Township 12 South, Range 21 East, Mount Diablo Base and Meridian (MDBM).

The SOI Expansion Area includes 139 Assessor's Parcels. Exhibit 2-3 depicts the parcels within the SOI Expansion Area and the proposed new SOI boundary, with specific Assessor's Parcel Numbers (APNs) identified for the Master Plan Area. In addition, APNs 557-031-30, -32S, -34, -36, -38, -40, -43S, and -45 are located along the north side of Shepherd Avenue and are owned by the City for future roadway right-of-way. No portion of the SOI Expansion Area is located on a list compiled pursuant to Section 65962.5 of the Government Code (Cortese List).

Project Description

The proposed project would expand the City's SOI to include the approximately 952-acre SOI Expansion Area, which is currently outside of the SOI boundary (SOI Expansion). The proposed project would also adopt a comprehensive Vista Ranch Master Plan (Master Plan) to guide development within approximately 507 acres of the SOI Expansion Area, and the proposed project would implement the Vista Ranch Development (Vista Ranch Development), which would develop approximately 368 acres of the Master Plan Area with mixed uses over a buildout period of approximately 10 years. The Vista Ranch Development would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities. The Vista Ranch Development is planned to include a mixed-use village core area with a range of lower and higher-density residential development. Lower residential densities toward the edges of the development provide a transition to surrounding rural/agricultural use. Within the Vista Ranch Development, new public and private roadways would enable access and circulation. The Vista Ranch Development would also include an extensive trail system to provide neighborhood connectivity, as well as safe and convenient access from residential areas to community amenities and commercial uses.

Project Objectives

The underlying purpose of the proposed project is to expand the City's SOI to include the SOI Expansion Area, with annexation, master planning, and subsequent development of land to accommodate growth. The project objectives include:

- Expand the City's SOI in an area contemplated by the City General Plan to establish a logical and orderly boundary that promotes the efficient extension of municipal services to areas planned for growth.
- Undertake master planning as a long-range planning tool to guide development within areas designated for growth under the City of Clovis General Plan.
- Provide residential housing opportunities that are visually attractive and accommodate the future housing demand in the City.
- Refine the mixture of housing types, sizes, and densities that collectively provide for local and regional housing demand.
- Provide infrastructure that meets City and Fresno Metropolitan Flood Control District standards and is integrated with existing and planned facilities and connections.
- Establish a logical phasing plan designed to ensure that each phase of development would include necessary public improvements required to meet City standards.
- Develop a strong pedestrian network that links activities, recreational amenities, local commercial uses, and neighborhoods together.
- Establish neighborhood designs that consider safety and security of citizens.

- Consider affordability and housing diversity by developing residential uses that are proximate to urban services and roadways and varied in size and density.
- Embrace the natural resources and views of the Sierra Nevada Mountain range.

Significant Unavoidable Adverse Impacts

The proposed project would result in the following significant unavoidable impacts:

- **Project-level Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas (GHG) Emissions:** The construction and operation of MP Area 2 would generate GHG emissions, but the timing, scale, and nature of future development are currently unknown and driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be significant and unavoidable for MP Area 2.
- **Cumulative Conflict with Plan, Policy, or Regulation that Reduces GHG Emissions:** Because climate change is a global issue, GHG emissions are inherently cumulative. The environmental effects, such as sea level rise, higher temperatures, droughts, and wildfires, are already occurring. MP Area 2 would contribute to these impacts, and even with mitigation, its GHG emissions would be cumulatively considerable. Additionally, the construction and operation of cumulative projects in addition to MP Area 2 would generate GHG emissions, but the timing, scale, and nature of future development are currently unknown and would be driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be cumulatively considerable and significant and unavoidable.
- **Project-level Vehicle Miles Traveled (VMT) Impacts:** The proposed project has incorporated all feasible VMT-reducing project features, regulations, and mitigation measures that would be effective in reducing the impacts of the proposed project. However, the geography, development, and climate in the Clovis/Fresno region, and essentially the entirety of the San Joaquin Valley, are not conducive to residents being able to commute to work, perform the required shopping, and make other trips (such as health care or entertainment) via means of transportation such as walking, bicycling, or mass transit. As the Clovis/Fresno region is not a dense city with high-rise residential, office, health care, and shopping all within close proximity, and with high heat in the summer and cold/rain/fog in the winter, simply providing for and promoting active transportation and transit opportunities does not generally result in a noticeable reduction in the number of vehicle miles residents must travel per day. Although the proposed project includes future transit route extensions, the regional transit system has not been developed to the extent that a majority of residents are willing to utilize it; therefore, on a project level, providing additional transit facilities would not be effective in reducing VMT in anything other than *de minimis* levels. Likewise, carpooling has been promoted for several decades with minimal benefit as many employees tend to work different hours, do not live near

each other, are required to attend appointments, or continue to enjoy the independence and opportunity to run other errands during the commute. For these reasons, the Supplemental Traffic Analyses prepared by Peters Engineering Group (Peters Engineering), dated September 12, 2025, determined that additional VMT mitigation measures would not be effective in further reducing the proposed project's VMT. As such, impacts would be significant and unavoidable even with the incorporation of Mitigation Measure (MM) TRANS-2.

- **Cumulative VMT Impacts:** Although the proposed project would incorporate a range of strategies, project design features, and MM TRANS-2, these measures would not be sufficient to offset the significant increase in VMT associated with new residential and employment uses, as explained with respect to project-level VMT impacts. VMT, by definition, is cumulative; as such, the proposed project would contribute to an increase in VMT and that increase would be considered significant and unavoidable. Therefore, the proposed project would result in a cumulatively considerable contribution to VMT. As such, the proposed project, in conjunction with other planned and approved projects, would result in a significant and unavoidable cumulative impact with respect to VMT.

Summary of Project Alternatives

Below is a summary of the alternatives to the proposed project considered in Chapter 5, Alternatives to the Proposed Project.

- **Alternative 1–No Project Alternative:** Under this alternative, the SOI Expansion, adoption of the Master Plan, and Vista Ranch Development would not occur. The SOI Expansion Area would remain in its current condition, and no construction or land use activities of any kind would occur.
- **Alternative 2–Reduced Density Alternative:** Under the Reduced Density Alternative, there would be downzoning throughout the Master Plan Area to very low residential density. The total unit count would decrease from 3,286 units under the proposed project to a total of 854 units under the Reduced Density Alternative. However, development would still occur throughout the same Master Plan Area as the proposed project. The area would be developed with fewer homes per acre, resulting in a more rural or semi-rural character. While the Reduced Density Alternative would still require the extension of infrastructure (such as roads, water, and sewer lines) to serve the new homes, the scale and intensity of these improvements would be reduced to accommodate the reduction in density.
- **Alternative 3–Increased Mixed-use Alternative:** Under this alternative, the proposed project would include a reduced number of residential units to accommodate additional commercial and retail uses consistent with the proposed Mixed Use Village Land Use. Specifically, this alternative would increase the acreage of mixed-use development within the 507-acre Master Plan Area from 16 acres to 102 acres. This would result in approximately 20 percent of the Master Plan Area being defined as mixed-use development.

Areas of Controversy

Pursuant to CEQA Guidelines Section 15123(b), a summary section must address areas of controversy known to the lead agency, including issues raised by agencies and the public, and it must also address issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects.

A Notice of Preparation (NOP) for the proposed project was issued on March 3, 2025. The NOP describing the original concept for the project and issues to be addressed in the EIR was distributed to the State Clearinghouse, responsible agencies, and other interested parties for a 30-day public review period extending from March 3, 2025, through April 2, 2025. The NOP identified the potential for significant impacts on the environment related to the following topical areas:

- Aesthetics, Light, and Glare
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

Disagreement Among Experts

This Revised Draft EIR contains substantial evidence to support all the conclusions presented herein. It is possible that there will be disagreement among various parties regarding these conclusions, although the City of Clovis Planning Division is not aware of any disputed conclusions at the time of this writing. Both the CEQA Guidelines and case law clearly provide the standards for treating disagreement among experts. Where evidence and opinions conflict on an issue concerning the environment, and the lead agency knows of these controversies in advance, the EIR must acknowledge the controversies, summarize the conflicting opinions of the experts, and include sufficient information to allow the public and decision-makers to make an informed judgment about the environmental consequences of the proposed project.

Potentially Controversial Issues

Below is a list of potentially controversial issues that may be raised during the public review and hearing process of this Revised Draft EIR:

- Aesthetics, Light, and Glare
- Air Quality
- Biological Resources
- GHG Emissions
- Hydrology and Water Quality
- Public Services
- Transportation
- Utilities and Service Systems

It is also possible that evidence will be presented during the 45-day, statutory Revised Draft EIR public review period that may create disagreement. Decision-makers would consider this evidence during the public hearing process.

In rendering a decision on a project where there is disagreement among experts, the decision-makers are not obligated to select the most environmentally preferable viewpoint. Decision-makers are vested with the ability to choose whatever viewpoint is preferable and need not resolve a dispute among experts. In their proceedings, decision-makers must consider comments received concerning the adequacy of the Revised Draft EIR and address any objections raised in these comments. However, decision-makers are not obligated to follow any directives, recommendations, or suggestions presented in comments on the Revised Draft EIR and can certify the Final EIR without needing to resolve disagreements among experts.

Public Review of the Revised Draft EIR

Upon completion of the Revised Draft EIR, the City of Clovis Planning Division filed a Notice of Completion (NOC) with the State Office of Planning and Research to begin the public review period (PRC § 21161). Concurrent with the NOC, this Revised Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Revised Draft EIR in accordance with PRC 21092(b)(3). During the public review period, the Revised Draft EIR, including the technical appendices, is available for review at the City of Clovis Planning Division and the County of Fresno Library, Clovis Branch. The address for each location is provided below:

City of Clovis Planning Division
1033 Fifth Street
Clovis, CA 93612

County of Fresno Library, Clovis Branch
1155 Fifth Street
Clovis, CA 93612

The Revised Draft EIR is also available for review at the following website: https://www.clovisca.gov/services/planning_development/planning/projects/visit_ranch.php.

Agencies, organizations, and interested parties have the opportunity to comment on the Revised Draft EIR during the 45-day public review period. Written comments on this Revised Draft EIR should be addressed to:

McKencie Perez, MPA, Deputy City Planner
City of Clovis Planning Division
1033 Fifth Street
Clovis, CA 93612
Phone: 559.324.2310
Email: mckenciep@clovisca.gov

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised

will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing on the proposed project, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed project.

The City intends for the Revised Draft EIR to entirely replace the prior draft EIR published July 19, 2024. Comments on the prior NOP and prior draft EIR are part of the administrative record; however, written responses to those comments are not required, and new comments on the Revised Draft EIR must be submitted. (CEQA Guidelines § 15088.5(f)(1) and (3)). However, previous comments were considered in the preparation of this Revised Draft EIR.

Executive Summary Matrix

Table ES-1 below summarizes the impacts, mitigation measures, and resulting level of significance after mitigation for the relevant environmental issue areas evaluated for the proposed project. The table is intended to provide an overview; narrative discussions for the issue areas are included in the corresponding section of this EIR. Table ES-1 is included in the EIR as required by CEQA Guidelines Section 15123(b)(1).

Table ES-1: Executive Summary Matrix

Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 3.1—Aesthetics, Light, and Glare		
Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista.	None.	N/A
Impact AES-2: The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	None.	N/A
Impact AES-3: The proposed project would not, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings.	None.	N/A
Impact AES-4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM AES-4: Nighttime Lighting Standard** The following measures shall be required of all development in Master Plan (MP) Area 1 and MP Area 2 to avoid and reduce impacts of nighttime lighting and fugitive light/glare on wildlife. With prior written approval from the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS), equally protective measures may be substituted. Development applicants shall be responsible for implementing all	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	measures; the City of Clovis (City) shall enforce measures as Conditions of Approval under the entitlements process. • No lighting shall be installed in protected open space areas; lighting on parcels adjacent to open space—whether protected or not—shall be limited to the minimum needed for public safety; • Public exterior lighting shall be equipped with full cut-off shielded luminaires to reduce light spill; • Use of uplights on buildings shall be prohibited, and use of uplighting in general shall be limited to low-voltage, low-lumen-output uplighting on trees in public spaces and low-voltage lighting on entry signage; • Exterior light fixtures in both public and private spaces shall be mounted as low as possible while still providing for safety and satisfying City code requirements; and • Lighting sources shall be restricted to those that provide good color rendering such as light-emitting diodes (LEDs) and metal halide lamps; no use of high- or low- pressure sodium lamps or mercury vapor lamps shall be permitted.	
Cumulative Impact: The proposed project would have a less than significant cumulative impact related to aesthetics, light, and glare.	None.	N/A
Section 3.2—Agriculture and Forestry Resources		
Impact AG-1: The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact AG-2: The proposed project would not conflict with existing zones for agricultural use, or a Williamson Act Contract.	***MP Area 2*** **MM AG-2:** The project applicant for any development within the Master Plan (Master Plan) shall provide the City of Clovis (City) with evidence that there is not an active Williamson Act Contract encumbering their property. The property owner(s) of Planning Area (PA) 29 shall adhere to the "Williamson Act Cancellation Process, Guide for Local Governments."	Less than significant impact with mitigation incorporated.
Impact AG-3: The proposed project would not 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)).	None.	N/A
Impact AG-4: The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.	None.	N/A
Impact AG-5: The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use.	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to agriculture and forestry resources with project-specific mitigation incorporated.	***MP Area 2*** Implement project-specific **MM AG-2**; no additional mitigation is required at the cumulative level.	Less than cumulatively considerable contribution with project-specific mitigation incorporated.
Section 3.3—Air Quality		
Impact AIR-1: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.	***MP Area 2*** **MM AIR-1a**: Prior to discretionary approval by the City of Clovis (City) for any development project within Master Plan (MP) Area 2 that is subject to California Environmental Quality Act (CEQA) review, project applicants shall prepare and submit a technical air quality assessment evaluating the project's construction emissions of criteria air pollutants in accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. All emissions that the assessment identifies in excess of zero shall be fully offset through a combination of onsite, offsite, and/or SJVAPCD-approved emission reduction mechanisms sufficient to reduce net construction emissions to zero. To achieve zero-net construction emissions, the City shall require applicants to implement any combination of the following, or other mechanisms of equivalent or superior effectiveness approved by the City and SJVAPCD: • Implement on-site measures that reduce construction emissions of nitrogen oxides (NO_X), reactive organic gas (ROG), particulate matter, less than 10 microns in diameter (PM_{10}), and particulate matter, less than 2.5 microns in diameter ($PM_{2.5}$) to the maximum extent feasible, which may include but are not limited to: – Use of Tier 4 Final offroad diesel equipment or the cleanest equipment available at the time of construction; – Substitution of electric-powered or zero-emission construction equipment where commercially available; – Installation of temporary electric power to avoid use of diesel generators; – Idling restrictions stricter than State requirements of 5 minutes (e.g., 2 minute maximum); – Require all haul trucks and vendor trucks to meet Model Year 2010 or newer engine standards; – Use of low volatile organic compound (VOC) coatings and materials during construction;	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	– Enhanced dust control measures beyond SJVAPCD Rule 8021/8031 (e.g., applying water stabilizers, increased watering frequency, wind fencing, or early paving); – Minimizing overlapping construction phases and sequencing activities to reduce daily equipment intensity; – Use of carpooling, shuttles, or staging management to reduce construction worker Vehicle Miles Traveled (VMT); – Implementing a Construction Emissions Reduction Plan demonstrating quantifiable reductions. Any remaining construction emissions that cannot be feasibly reduced on-site shall be mitigated through SJVAPCD-approved mechanisms (such as a Voluntary Emission Reduction Agreement (VERA) or off-site emission reduction program) to achieve a net-zero construction emissions outcome. **MM AIR-1b**: Prior to discretionary approval by the City of Clovis (City) for any development project within Master Plan (MP) Area 2 that is subject to California Environmental Quality Act (CEQA) review, project applicants shall prepare and submit a technical air quality assessment evaluating the project's operational emissions of criteria air pollutants in accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. All emissions that the assessment identifies in excess of zero shall be fully offset through a combination of on-site, off-site, and/or SJVAPCD-approved emission reduction mechanisms sufficient to reduce net operational emissions to zero, such that each development project in the MP Area 2 results in no net increase in regional criteria pollutant emissions. To achieve zero-net operational emissions, the City shall require applicants to implement any combination of the following, or other mechanisms of equivalent or superior effectiveness approved by the City and SJVAPCD: • On-site operational emission reduction strategies, including but not limited to: • Electric-ready or all-electric building design; • Installation of electric vehicle (EV) charging infrastructure exceeding minimum code; • Transportation demand management (TDM) programs that reduce Vehicle Miles Traveled (VMT); • Provision of transit passes, micro-transit, or car-share programs; • Installation of photovoltaic systems sized to offset on-site energy loads; • Use of low- or zero-emission landscape maintenance equipment;	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Installation of additional bicycle and pedestrian facilities that shift trips away from vehicle use. Off-site mitigation measures, including participation in: • Off-site EV charging infrastructure projects; • Off-site renewable energy or electrification programs; • SJVAPCD-approved off-site emission reduction projects. A Voluntary Emission Reduction Agreement (VERA) with SJVAPCD, used to mitigate remaining residual emissions of nitrogen oxides (NO_X), reactive organic gas (ROG), particulate matter, less than 10 microns in diameter (PM_{10}), and particulate matter, less than 2.5 microns in diameter ($PM_{2.5}$) to zero. • A VERA may be used alone or in combination with on-site and off-site measures to fully offset remaining emissions. • All VERA obligations shall be secured through conditions of approval. The final mitigation package shall achieve full zero-offset (0 pounds per day net operational emissions) for each criteria pollutant (quantified through the required technical assessment). All required mitigation measures shall be included as conditions of project approval and shall be enforceable by the City. ***Vista Ranch Development/MP Area 1*** **MM AIR-1c:** Require the use of low volatile organic compound (VOC) (reactive organic gas [ROG]) paints in exceedance of the minimum regulatory requirements of Rule 4601. Prior to issuance of any grading or construction permits, the Owner/Operator shall demonstrate that all architectural coatings used during operation shall be super-compliant, defined as having a VOC (ROG) content of 10 grams per liter or less, significantly below the limits specified in Rule 4601. This requirement applies to all interior and exterior paints, primers, stains, and sealers used on buildings, structures, and site features. The construction contractor shall: • Include this requirement in all procurement documents and subcontractor agreements. • Maintain records of product specifications and VOC content for all coatings used. • Submit documentation to the City of Clovis (City) demonstrating compliance prior to final inspection.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• The City shall verify compliance through periodic site inspections and review of contractor submittals. **MM AIR-1d:** Prior to issuance of any grading or construction permits the Owner/Operator shall enter into a Voluntary Emission Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD) to mitigate oxides of nitrogen (NO_X) and reactive organic gases (ROG) emissions associated with implementation of the Vista Ranch Development that are not otherwise required to be fully offset by SJVAPCD permit rules and regulations to quantities below the SJVAPCD regional thresholds of significance (for operations).	
Impact AIR-2: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	***MP Area 2*** Implement **MM AIR-1a** and **MM AIR-1b**. ***Vista Ranch Development/MP Area 1*** Implement **MM AIR-1c** and **MM AIR-1d**.	Less than significant impact with mitigation incorporated.
Impact AIR-3: The proposed project would not expose sensitive receptors to substantial pollutant concentrations.	***MP Area 2*** **MM AIR-3**: Prior to discretionary approval by the City of Clovis, project applicants for new development projects that (1) have the potential to generate emissions of toxic air contaminants (TACs) and/or diesel particulate matter (DPM) emissions during construction or operation, and (2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a Health Risk Assessment (HRA) to the City of Clovis for review and approval. The HRA shall be prepared in accordance with policies and procedures of the California Office of Environmental Health Hazard Assessment (OEHHA) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). If the HRA shows that the incremental cancer risk and/or non-cancer hazard index (HI) exceed the respective thresholds, as established by the SJVAPCD at the time a project is considered, the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACT), including appropriate enforcement mechanisms, are capable of reducing potential cancer and non-cancer risks to an acceptable level. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.	Less than significant impact with mitigation incorporated.
Impact AIR-4: The proposed project would not result in other	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
emissions (such as those leading to odors) adversely affecting a substantial number of people.		
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to air quality with project-specific mitigation incorporated.	***MP Area 2*** Implement project-specific **MM AIR-1a**, **MM AIR-1b**, and **MM AIR-3;** no additional mitigation is required at the cumulative level. ***Vista Ranch Development/MP Area 1*** Implement project-specific **MM AIR-1c** and **MM AIR-1d;** no additional mitigation is required at the cumulative level.	Less than cumulatively considerable contribution with project-specific mitigation incorporated.
Section 3.4—Biological Resources		
Impact BIO-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on 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 United States Fish and Wildlife Service.	***MP Area 2*** **MM BIO-1a: Biological Studies and Protective Measures** As part of the development planning process(es) for Master Plan (MP) Area 2, the development applicant(s) shall retain a qualified Biologist(s) to conduct a comprehensive biological resources evaluation (BRE) of the proposed development area(s) and surrounding vicinity. Coverage of the surrounding area shall be determined by the Biologist(s) based on the best available conservation science for the species with potential to be present and shall be inclusive enough to detect all species with the potential to be affected by disturbance (e.g., due to construction activity) as well as habitat degradation and loss. The BRE(s) shall address, at a minimum, the following: • Types of habitat present and habitat quality. • Presence of sensitive natural communities, if any. • Presence of wildlife migration or movement corridors, if any. • Presence of wildlife nursery sites, if any. • Presence, and potential for presence, of special-status plants.	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Presence, and potential for presence, of special-status wildlife, including. State- and/or federally listed and candidate species, as well as species that qualify for other forms of special-status under the California Environmental Quality Act (CEQA). • General information on location, extent, and quality of potentially jurisdictional wetlands and other waters on and near the site. • Resource agency permits/authorizations that may or will be required to authorize development activities. • Need for, and topics to be covered in, construction Worker Environmental Awareness Program (WEAP) training for biological resources, sensitive habitats, jurisdictional resources, and special-status species. If the Biologist determines that there is potential for the presence of special-status plants on the site, the BRE shall require protocol-level surveys for special-status plants, consistent with the California Department of Fish and Wildlife's (CDFW's) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities or most current equivalent. If listed, candidate, or proposed wildlife species are shown to be present on the site, or if there is a high probability of their presence, based on habitat conditions and species ranges, the BRE shall stipulate the need for consultation with CDFW and/or the United States Fish and Wildlife Service (USFWS) (depending on the species present/potentially present). The need for protocol-level surveys for special-status wildlife shall be determined in consultation with the resource agencies. If potentially jurisdictional wetlands or other waters are identified on the site, the BRE shall require consultation with the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and CDFW. Additionally, if the Biologist determines that site conditions warrant it, as is supported by the USFWS's Endangered Species Consultation Handbook, the BRE shall recommend follow-up steps, potentially including but not necessarily limited to: • Further non-protocol studies of habitat, plants, and wildlife at the site.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Protocol-level surveys for special-status plants, conducted in a manner consistent with CDFW Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities or most current equivalent. • Protocol-level surveys for special-status wildlife, conducted in a manner consistent with species-specific protocols adopted by the CDFW and/or USFWS, and current at the time of survey. • Consultation with State and/or federal resource agencies if listed or candidate species are involved. • Measures to avoid, reduce, and compensate for impacts on biological and jurisdictional resources in general, including sensitive natural communities, wildlife movement/migratory corridors, and wildlife nursery sites, consistent with current best conservation science and practices. • Measures to avoid, reduce, and compensate for impacts on special-status species and their habitat, consistent with adopted CDFW and/or USFWS agency protocols current at the time of project entitlement. The applicant(s) shall be responsible for implementing all requirements and follow-up measures identified in the BRE and for obtaining any resource agency permits required to authorize development activities (e.g., State Incidental Take Permit [ITP], aquatic resource permits, etc.). The applicant(s) shall also implement any permit conditions required by the resource agencies. Permit conditions required by the agencies shall be legally binding. The City shall ensure that the recommended measures to avoid, reduce, and compensate for impacts on biological and jurisdictional resources in general, and on special-status species and their habitat—or equally effective alternate measures based on current conservation science and subject to approval by CDFW and/or USFWS as appropriate—are included as Conditions of Approval (COAs) for the proposed development. **MM BIO-1b: Nesting Bird and Active Nest Protection** If vegetation removal or trimming, clearing/grubbing, excavation, or grading for development within Master Plan (MP) Area 2 is to begin during the bird nesting/breeding season (February 1 – September 15), the development applicant(s) shall retain a qualified Biologist to conduct a pre-construction survey for nesting birds. The survey shall take place no more than two weeks prior to the initiation of work. Surveys shall comply with the following guidance, or the most current equivalent thereof. • California Department of Fish and Wildlife (CDFW) Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Swainson's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. If any active nest is found, or nest-building activity is observed, in an area that could be directly affected by project activities, or in a location potentially subject to construction-related disturbance, a no-disturbance buffer zone(s) shall be established for nest protection. Buffers shall remain in place for the remainder of the nesting season or until the Biologist determines that all young have fledged or that the nest has been abandoned. No entry of personnel, equipment, or materials into the no-activity buffer shall be permitted without written authorization from the California Department of Fish and Wildlife (CDFW) (and if federally protected species are involved, the United States Fish and Wildlife Service [USFWS]). Buffers shall be delineated in the field by or under the supervision of the Biologist, using temporary construction fencing or another suitable low-impact medium. The size of the buffer zone(s) shall be determined by the Biologist based on the species involved, their behavior, the amount of vegetative and other screening between the nest and the locations(s) where potentially disturbing activities would be occurring, and, if appropriate, other site-specific factors. The minimum buffer widths shall be as follows: • 500 feet for raptors other than Swainson's Hawk • 0.5 mile for Swainson's Hawk • 300 feet for Tricolored Blackbird • 50 feet for all other species, unless modified by the Biologist based on site-specific observations, as follows Buffers shall be enlarged if the Biologist determines this is warranted, based on the following facts or other observations on-site: • Overall sensitivity of the nesting species • The behavior and apparent sensitivity of the individual nesting birds • Baseline noise disturbance levels at the construction site at the time of the survey and the level of noise and disturbance expected during construction activity ***Vista Ranch Development/MP Area 1*** **MM BIO-1c: Rare Plant Survey, Avoidance, and Transplantation**	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	Prior to groundbreaking for any project phase or sub-phase, the Vista Ranch Development applicant shall retain a qualified Biologist/Botanist who is familiar with the rare plants of the project region to conduct an additional round of protocol-level rare plant surveys. Surveys shall be conducted consistent with California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities or most current equivalent and shall cover the area reasonably expected to be disturbed within the next 2 years. If the area, or portions of the area, are not developed within 2 years of completion of the rare plant survey, then, prior to any future groundbreaking for that area, an additional round of protocol-level rare plant surveys shall be completed in accordance with the requirements of this mitigation measure. Surveys shall be conducted prior to construction with enough lead time to allow for consultation with the CDFW (and, if appropriate, United States Fish and Wildlife Service [USFWS]) and additional follow-up actions, if they are warranted. Surveys shall be conducted during the peak blooming periods of the target species and shall cover all potentially suitable habitats within Master Plan (MP) Area 1. If no special-status plants are documented within the area to be disturbed for project construction (including staging and access), no further action is required. If any listed plant species or any plant species assigned to California Rare Plant Rank (CRPR) 1 or 2 is found to be present, the following measures shall be implemented at a minimum. With prior written approval from CDFW—and, if federally listed species are involved, USFWS—equally protective measures may be substituted. The Vista Ranch Development applicant shall be responsible for implementing all measures. • The occurrence(s) shall be avoided and protected in place whenever it is possible to do so. • If the occurrence(s) cannot be entirely avoided, a Plant Salvage and Mitigation Plan shall be prepared and implemented. The Plant Salvage and Mitigation Plan shall be prepared by a qualified Biologist/Botanist who is familiar with the rare plants of the project region and has experience conducting rare plant salvage operations. The plan shall be subject to CDFW (and, if federally listed species are involved, USFWS) approval, and shall, at a minimum, include the following standards – Quantity and species of plants to be planted or transplanted – Location of the mitigation/transplant site(s), which shall be suitable to the species involved and within the species' known geographic range(s)	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	– Salvage methods, such as relocation/transplantation, seed collection, etc., including storage locations and methods to preserve the plants – Procedures for propagating collected seed, including storage methods – Planting procedures, including any use of soil preparation and irrigation – Schedule and action plan to maintain and monitor the mitigation/transplant site for a minimum three-year period following transplantation – Interim and final success criteria and corrective action thresholds, including growth, plant cover, and minimum survivorship of the transplanted species • Corrective actions/contingency measures in the event interim success criteria are not being met (e.g., weed removal, supplemental irrigation, supplemental plantings • Reporting requirements and procedures, including the contents of annual progress reports, report submittals, review/approval responsibilities The Plant Salvage and Mitigation Plan shall be implemented under the oversight of the Biologist/Botanist who prepared it or another individual with equivalent qualifications. **MM BIO-1d: Worker Environmental Awareness Program Training** The Vista Ranch Development applicant shall require all construction personnel to undergo Worker Environmental Awareness Program (WEAP) Training that provides information on the following: • the sensitive habitats in Master Plan (MP) Area 1 • special-status species known and potentially present in MP Area 1, including their – listing status and causes of decline – habitat preferences – distinguishing physical characteristics • the measures (Avoidance and Minimization Measures [AMMs], permit conditions, and CEQA mitigation) required to protect sensitive habitats and special-status species, including avoidance of delineated exclusion areas, and next steps and notifications in the event of a special-status species sighting.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	The training shall include a hard copy handout that summarizes the information presented and includes photographs of habitat resources and species to facilitate identification in the field by construction personnel. A readily available copy of the AMMs, permit conditions, and CEQA mitigation shall be maintained by the construction foreman on the construction site for reference. The applicant shall ensure that all construction personnel and any new personnel to the site undergo WEAP training prior to commencing ground-disturbing activities in MP Area 1. Training shall be delivered by a qualified Biologist experienced in the Fresno County/San Joaquin Valley area and shall be provided in English and, if appropriate, Spanish. Upon completion of training, employees shall sign a form stating that they attended the training and understand all of the required CEQA mitigation and permit conditions. Signed forms shall be submitted to the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Services (USFWS). **MM BIO-1e: California Tiger Salamander Avoidance and Protection** The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP), Clean Water Act (CWA) Section 404, and Streambed Alteration Agreement permitting processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW) and the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions relative to California tiger salamander (CTS), including Avoidance and Minimization Measures (AMMs) and habitat compensation. The following measures shall be required. If, via the State permitting processes or the federal interagency consultation process, CDFW and/or the United States Fish and Wildlife Service (USFWS) issue alternate requirements that would be equally or more protective, those shall be substituted. • The applicant shall develop a CTS Relocation Plan, prepared by a qualified Biologist and subject to approval by CDFW and USFWS. The CTS Relocation Plan shall include specific areas to which the designated qualified Biologist may relocate individual CTS that are at risk from project-related activities. It shall also include provisions for the Biologist to monitor the translocated animal until it is determined that it is not at risk from predators or other factors. CTS shall be relocated to the appropriate habitat for their stage in the life cycle; for example, CTS found in burrows shall be relocated to burrows and not to aquatic habitat. • If a known or potential CTS individual is encountered during any project-related activity, all the following requirements shall apply. – All work that could result in direct injury or disturbance of the individual animal shall cease immediately;	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	– The foreman and on-call Biologist shall be notified immediately; and – The Biologist shall take appropriate action to secure the individual (relocation per the CTS Relocation Plan and/or veterinary care if appropriate) and shall then notify CDFW, USFWS, and the applicant via telephone or email. • The applicant shall appoint a representative to act as the contact for the Biologist to receive notifications of CTS encounters. The representative shall be identified during the Worker Environmental Awareness Program (WEAP) Training program, and their name and contact information shall be provided to CDFW and USFWS. • An Herbicide Use Plan shall be drawn up prior to the onset of development activities and shall be subject to CDFW and USFWS approval before work on each phase begins. The plan shall allow no more than two applications of herbicide per year during development activities. Herbicides shall be used only in a manner that avoids primary or secondary poisoning of CTS and the prey populations on which they depend within the phase footprint. All uses of such compounds shall comply with label and other restrictions mandated by the United States Environmental Protection Agency (EPA) and the California Department of Food and Agriculture, and other appropriate State and federal regulations, as well as any other additional project-specific restrictions required by CDFW and/or USFWS. • Prior to ground disturbance for each phase or sub-phase (defined as major earthwork associated with rough grading, lot leveling, infrastructure construction, and street improvements; not including construction of individual homes on previously graded pads), the disturbance areas shall be subject to the following measures to protect CTS. These measures shall be enforced for the duration of ground-disturbing activities under the oversight of a qualified Biologist. After the completion of initial ground-disturbing activities for each phase or sub-phase, the qualified Biologist shall continue to be available by phone and shall be on-call to visit MP Area 1 as needed throughout phase construction. The Biologist's contact information shall be provided to CDFW and USFWS. – First, individual sub-phases or disturbance areas shall be identified within each project phase. Sub-phases shall be defined with the input of a qualified Biologist such that no undisturbed areas of potential CTS habitat are surrounded or cut off from other CTS habitat as a result of ground disturbance and/or implementation of other AMMs such as wetland exclusion areas. Instead, sub-phases shall be developed such that the most direct route from any given patch of potential CTS habitat on-site to the nearest accessible off-site CTS habitat remains open until the on-site patch has been subject to relocation measures, described below. Multiple, or	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	even all, sub-phases may be active concurrently, but no portion of the project or phase site shall be disturbed until after CTS relocation and other AMMs have been undertaken on it. – Following the survey and relocation of individuals, an exclusion barrier shall be installed at the limits of grading for the phase or sub-phase to prevent CTS from reentering the disturbance area. The materials and installation methods for the exclusion barrier shall be subject to approval by CDFW and USFWS, and the barrier shall be installed under Biologist oversight. The exclusion barrier shall be inspected weekly and maintained and repaired as necessary to ensure that it is functional and not a hazard to any CTS on the outside of the barrier. The barrier shall remain in place until the completion of major ground-disturbing activities within the phase or sub-phase it encompasses. – Once visual surveys, relocation, and exclusion barrier installation have been completed, the disturbance area may be subject to initial ground-disturbing activities (vegetation clearing, grubbing, scraping, grading, trenching, and other activities that would convert potential CTS upland habitat to non-habitat through the disruption of on-site rodent burrows). – A qualified Biologist shall be on-site to monitor vegetation clearing, grubbing, and rough grading, until or unless the Biologist determines that monitoring is no longer necessary. The Biologist(s) shall have authority to stop any work that may result in the take of CTS and to ensure adherence to all required AMMs. CDFW, USFWS, and USACE shall be notified of any "stop-work" orders issued by the Biologist(s). • The following requirements shall apply in areas that have not been "cleared" for CTS and enclosed in an exclusion barrier: – A qualified Biologist shall be on-site to monitor all work. The Biologist(s) shall have authority to stop any work that may result in the take of CTS and to ensure adherence to all required AMMs. CDFW, USFWS, and USACE shall be notified of any "stop-work" orders issued by the Biologist(s). – Work shall be prohibited when the National Weather Service 72-hour forecast predicts a 70 percent or greater chance of rainfall; work may resume 24 hours following the cessation of rainfall, if a 0 percent chance of rain is predicted in the next 72 hours. – Because CTS may take refuge in cavity-like and den-like structures, such as pipes, and may enter stored pipes and become trapped, all pipes, culverts, and similar structures that are stored in non-excluded portions of MP Area 1 for one or more overnight periods shall either be securely capped prior to storage or shall be	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	thoroughly inspected by the authorized on-call Biologist and/or the construction foreman/manager for CTS before the pipe is relocated, capped, buried, or otherwise used or moved in any way. – To prevent inadvertent entrapment of CTS during development, the on-call Biologist and/or construction foreman/manager shall ensure that all steep-walled excavations and trenches more than 1 foot deep are completely covered at the close of each working day by plywood or similar materials or are provided with one or more escape ramps constructed of earth fill or wooden planks and inspected and approved by the on-call Biologist. Before excavations or trenches are filled, they shall be thoroughly inspected for trapped animals by the on-call Biologist and/or construction foreman/manager. • The following requirements shall apply to all parts of MP Area 1 (within and outside CTS exclusion barrier). – Project-related vehicles shall observe a 15-miles-per-hour (mph) off-road speed limit. – Erosion control measures shall employ tightly woven fiber netting or similar material to reduce the potential for CTS entrapment. This limitation shall be communicated to all contractors through the use of Special Provisions included in the bid solicitation package. No plastic monofilament netting (erosion control matting) or similar materials shall be used. – No insecticides or rodenticides shall be used in construction or development areas as part of the project development process. – To reduce the potential that predators of CTS shall be attracted to MP Area 1, all food-related trash items, such as wrappers, cans, bottles, and food scraps, shall be disposed of in solid, tightly closed containers (trash cans) and shall be removed from the construction site regularly. **MM BIO-1f: Crotch's Bumble Bee Avoidance and Protection** The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP) and Streambed Alteration Agreement processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW). The applicant shall then be responsible for implementing all permit conditions relative to Crotch's bumble bee, including Avoidance and Minimization Measures (AMMs) and habitat compensation. The following AMMs shall be required. If, via the State ITP or Streambed Alteration Agreement process, CDFW issues alternate requirements that would be equally or more protective, those shall be substituted.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• No more than 1 year prior to the initiation of vegetation removal and grading in MP Area 1, the applicant shall retain an appropriately qualified Biologist (see next paragraph) to conduct surveys for Crotch's bumble bee. • Surveys shall be performed by a qualified entomologist familiar with the species' behavior and life history and shall include both habitat evaluations and foraging bee surveys consistent with the recommendations in CDFW *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Surveys shall be conducted during the peak worker activity period for Crotch's bumble bee (April 1–July 31) and shall cover all areas of on-site habitat determined by the Biologist to be suitable for the species, based on habitat mapping conducted for the Vista Ranch Development to date and observations in MP Area 1 at the time of survey. A minimum of three to four surveys shall be conducted, spaced 2 weeks apart; the total number, timing, and duration of surveys performed shall depend on the Biologist's judgment, in consideration of weather, site conditions, and current CDFW recommendations/ protocols. • If no Crotch's bumble bee individuals are observed on-site and no sign of the species' presence is detected during the surveys, no further action shall be required. • If Crotch's bumble bee is observed on-site during the surveys, an additional survey or surveys shall be conducted to determine whether a nest or colony is present, unless the Biologist is satisfied that the initial survey(s) were sufficient to rule out the presence of nests/colonies. • If a nest or colony is present on-site, the Biologist shall establish an appropriate avoidance buffer determined in consideration of site conditions and the construction activities planned prior to the close of the nesting season. No entry into the buffer shall be permitted. The buffer shall be delineated in the field using orange construction fencing or another appropriate medium under the Biologist's oversight and shall remain in place until the end of the Crotch's bumble bee gyne flying season (February 21–August 7), or until the Biologist determines that the nest has been abandoned. • If no nest/colony is present on-site, no further action needs to be taken. To support improved understanding and conservation of Crotch's bumble bee, survey results, including negative findings, shall be submitted to CDFW before project-related ground disturbance begins. At a minimum, the survey report shall include the following information: • A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee;	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Field survey conditions, including name(s) of qualified entomologist(s) and brief qualifications, date(s) and time(s) of survey, survey duration, general weather conditions, survey goals, and species searched; • Map(s) showing the location of nests/colonies, if any; • A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found, including native plant composition within impacted habitat (species list separated by vegetation class; density, cover, and abundance of each species); • The AMMs that shall be implemented to avoid adverse effects on Crotch's bumble bee; • An assessment of potential effects on special-status bumble bees during project construction and project operation/maintenance with AMMs in place. Additionally, all workers shall be required to avoid injury and mortality to Crotch's bumble bees they may encounter; this requirement shall be discussed during the Worker Environmental Awareness Program (WEAP) Training required for all construction personnel (Mitigation Measure [MM] BIO-1d) and shall be reiterated to all workers if special-status Crotch's bumble bees are confirmed on-site. **MM BIO-1g: Western Burrowing Owl Avoidance and Protection** The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP) and Streambed Alteration Agreement processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW). The applicant shall then be responsible for implementing all permit conditions relative to Western Burrowing Owl (BUOW), including Avoidance and Minimization Measures (AMMs) and habitat compensation. The following measures shall be required. If, via the State ITP process, CDFW issues alternate requirements that would be equally or more protective, those shall be substituted. • The applicant shall develop a BUOW Exclusion and Relocation Plan prepared by a qualified Biologist and subject to approval by CDFW. The BUOW Exclusion and Relocation Plan shall provide for the installation of BUOW exclusion measures in the event occupied burrows are observed during surveys (see below), as well as artificial burrows to replace occupied and suitable burrows affected by construction ground disturbance. Measures stipulated in the BUOW Exclusion and Relocation Plan shall be consistent with CDFW's most current recommendations.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Prior to contractor mobilization on-site, a qualified Biologist shall survey Master Plan (MP) Area 1 for BUOW. Surveys shall be conducted per the following methodology. – A minimum of two pre-construction surveys shall be conducted, unless the first survey detects BUOW, in which case a second survey is not needed. Surveys shall conclude no more than 2 calendar days prior to construction. Surveys shall therefore begin no more than 4 days prior to the date planned for contractor mobilization on-site to allow for 2 days of surveying plus up to 2 days between surveys and mobilization. To avoid the potential for last-minute changes in the construction schedule, a preliminary survey may be conducted up to 15 days before mobilization. The preliminary survey shall be counted as the first of the two required surveys, as long as the second survey concludes no more than 2 calendar days in advance of construction. – To maximize the likelihood of detecting BUOW, each survey shall last a minimum of 3 hours. – Surveys shall cover all areas of suitable habitat within the footprint of the phase or sub-phase where construction is being initiated, plus a 600-foot-wide buffer. Surveys shall entail walking straight-line transects spaced approximately 7 to 20 meters (approximately 23 to 65 feet) apart, adjusting for vegetation height and density based on the judgment of the surveying Biologist. At the start and termination of each survey and at least every 100 meters (approximately 325 feet) along the transect, binoculars shall be used to scan the entirety of the visible phase area and buffer for BUOW. Survey transects shall extend to the boundary of the property to which the applicant has legal access; where the buffer encompasses property owned/ controlled by others, the survey shall be visual-only, using binoculars. – Surveys shall be timed for optimal weather conditions for BUOW detection: ambient temperature >20ºC (degrees Celsius) (>68ºF [degrees Fahrenheit]), winds <12 kilometers per hour (km/h) (7.5 miles per hour [mph]), and cloud cover <75 percent. Surveys shall not be conducted if wind speeds exceed 20 km/h (~12 mph) and there is precipitation or dense fog. – Surveys shall be conducted during the time windows when BUOW detection probabilities are highest: between morning civil twilight and approximately 10:00 a.m., and between 2 hours before sunset and evening civil twilight. – During the surveys, all burrows known to be or potentially in use by BUOW shall be recorded and their locations captured using sub-meter-precision Global Positioning System (GPS). Potentially used burrows shall be determined based on the presence of one or more of the following: BUOW individuals, pellets, prey	

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<tr><th>Impacts</th><th>Mitigation Measures</th><th>Level of Significance After Mitigation</th></tr>
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remains, whitewash, and/or decoration. Survey personnel shall also listen for BUOW calls while conducting the surveys.
– Care shall be taken to minimize disturbance near known or potentially occupied burrows to avoid flushing BUOW.
– If raptors or other predators that may suppress BUOW activity are present, the Biologist shall return for a follow-up survey.
– Any BUOW observed shall be counted, and their location(s) shall be mapped.
– BUOW observed shall be checked for bands; bands/band combinations shall be reported to the United States Geological Survey’s (USGS’s) Bird Banding Laboratory.

If occupied burrows are identified during the surveys, passive relocation shall be performed in accordance with the CDFW-approved BUOW Exclusion and Relocation Plan. Artificial burrows shall be located as close as feasible to the affected existing burrows, but outside the area planned for construction disturbance. Artificial burrows shall be located within 100 meters (m) (approximately 325 feet) of the burrows they replace per current CDFW guidance, and the BUOW Exclusion and Relocation Plan shall stipulate this as a target to be achieved where feasible.
• Construction shall not proceed until passive relocation per the BUOW Exclusion and Relocation Plan has been accomplished and the Biologist has confirmed that burrows can be destroyed without injury or mortality to BUOW.
• Known and potentially occupied burrows shall be further assessed by the Biologist to determine whether nesting activity is taking place. If no eggs or chicks are present, the burrow shall be subject to passive relocation per the CDFW-approved BUOW Exclusion and Relocation Plan. If eggs or chicks are present, the burrow shall be protected in place by the establishment of a no-activity exclusion buffer. Buffer widths shall depend on the nature and level of activity planned in the vicinity, as follows:
<table>
<tr><th rowspan="2">Time of Year</th><th colspan="3">Level of Disturbance</th></tr>
<tr><th>Low</th><th>Medium</th><th>High</th></tr>
<tr><td>April 1–August 15</td><td>200 m (650 ft)</td><td>500 m (1,625 ft)</td><td>500 m (1,625 ft)</td></tr>
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Impacts	Mitigation Measures	Level of Significance After Mitigation

August 16–October 15	200 m (650 ft)	200 m (650 ft)	500 m (1,625 ft)
October 16–March 31	50 m (163 ft)	100 m (325 ft)	500 m (1,625 ft)

Nest buffers shall be delineated in the field using temporary construction fencing or another appropriate medium installed under the direct supervision of the qualified Biologist. No entry of personnel, equipment, or materials shall be permitted into the buffer area. Buffers shall remain in place until the Biologist has confirmed that the young have fledged, are foraging independently, and are no longer dependent on the nest, or that the nest has been abandoned. Once the buffer has been removed, the nest burrow shall be subject to passive relocation per the CDFW-approved BUOW Exclusion and Relocation Plan.

MM BIO-1h: Western Pond Turtle Protection

The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) requirements relative to western pond turtle, including the Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of any agreements for long-term maintenance and management responsibilities shall be completed prior to project groundbreaking.

If western pond turtle does not become listed under the federal Endangered Species Act and the federal BO and CWA Section 404 permit do not prescribe other requirements, the requirements of MM BIO-1o shall be substituted. In this case the applicable guidance shall be the Draft United States Geological Survey (USGS) *Western Pond Turtle (Emys marmorata) Visual Survey Protocol for the Southcoast Ecoregion*.

MM BIO-1i: Western Spadefoot Avoidance and Protection

The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then

Impacts	Mitigation Measures	Level of Significance After Mitigation
	be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) conditions relative to western spadefoot, including Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of agreements for long-term maintenance and management responsibilities shall be completed prior to project ground disturbance. At a minimum, all AMMs identified in Mitigation Measure (MM) BIO-1e for California tiger salamander (CTS) shall also be required for western spadefoot. Surveys, relocation efforts, and activities related to exclusion barriers shall be combined for CTS and western spadefoot where this would increase efficiency and effectiveness. If, via the federal interagency consultation process, USFWS issues alternate requirements that would be equally or more protective, those shall be substituted. If western spadefoot does not become listed under the federal Endangered Species Act and the federal BO and CWA Section 404 permit do not prescribe other requirements, the requirements of MM BIO-1o shall be substituted. In this case, surveys and, if warranted, relocation of individuals shall be conducted consistent with agency requirements in existence at the time of survey and with prevailing best conservation practices. **MM BIO-1j: Compensation for Impacts on Vernal Pool Fairy Shrimp** The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) requirements relative to Vernal Pool Fairy Shrimp (VPFS), including Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of agreements for long-term maintenance and management responsibilities shall be completed prior to project ground disturbance. **MM BIO-1k: Nesting Bird and Active Nest Protection** At a minimum, the following precautions shall be required to protect California Endangered Species Act (CESA)-listed bird species whose presence cannot be ruled out, as well as other special-status birds, and common species protected under the California Fish and Game Code (FGC) and/or the federal Migratory Bird Treaty Act (MBTA). With prior written approval from the California Department of Fish and Wildlife (CDFW)—and, if federally protected	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	species are involved, United States Fish and Wildlife Service (USFWS)—equally protective measures may be substituted. The Vista Ranch Development applicant shall be responsible for implementing all measures. • If vegetation removal or trimming, clearing/grubbing, or grading for any phase or sub-phase of the Vista Ranch Development commences during the nesting/breeding season of native bird species potentially nesting on or near the work site (February 1 – September 15), the applicant shall retain a qualified Biologist to conduct a pre-construction survey for nesting birds. The survey shall take place no more than 2 weeks prior to the initiation of work. Surveys shall further comply with the following guidance, or the most current equivalent thereof: – CDFW Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015. – Swain's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley. • If no active nests of any bird species are documented and no nest-building activity is observed within the area to be disturbed for project construction (including staging and access), no further action shall be required. • If nest-building activity is observed or active nests are found in areas that could be directly affected by project activities, or in locations where they could be disturbed by construction activity and noise, the following measures shall be implemented, at a minimum. – No-disturbance buffer zone(s) shall be established for nest protection. Buffers shall remain in place for the remainder of the nesting season or until the Biologist determines that all young have fledged or that the nest has been abandoned. No entry of personnel, equipment, or materials into the no-activity buffer shall be permitted without authorization from CDFW (and if federally protected species are involved, USFWS). – Buffers shall be delineated in the field by or under the supervision of the Biologist, using temporary construction fencing or another suitable low-impact medium. The size of the buffer zone(s) shall be determined by the Biologist based on the species involved, their behavior, the amount of vegetative and other screening between the nest and the locations(s) where potentially disturbing activities would occur, and, if appropriate, other site-specific factors. The minimum buffer widths shall be as follows: ○ 500 feet for raptors other than Swainson's Hawk; ○ 0.5 mile for Swainson's Hawk; ○ 300 feet for Tricolored Blackbird;	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	○ 50 feet for all other species, unless modified by the Biologist based on site-specific observations. Buffers may be enlarged by taking into account factors such as the following: • Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; and • Sensitivity of the nesting species and behaviors of the individual nesting birds. **MM BIO-1l: Compensation for Loss of Swainson's Hawk and White-tailed Kite Habitat** Planning for the preserve proposed to compensate for losses of special-status species habitat in Master Plan (MP) Area 1 shall take into account impacts on Swainson's Hawk and White-tailed Kite habitat and shall be guided by the California Department of Fish and Wildlife (CDFW) approved mitigation ratios for losses of Swainson's Hawk habitat as laid out in the CDFW *Staff Report Regarding Mitigation for Impacts to Swainson's Hawks* or most current equivalent. According to CDFW, those ratios are as follows: • For projects within 1 mile of an active nest tree: 1 acre of foraging habitat for each acre of development authorized (1:1 ratio), or 0.5 acre of land that can be actively managed for prey production (0.5:1 ratio), • For projects within 5 miles of an active nest tree but greater than 1 mile from the nest tree: 0.75 acre of foraging habitat for each acre of urban development authorized (0.75:1 ratio), • For projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree: 0.5 acre of suitable foraging habitat for each acre of urban development authorized (0.5:1 ratio). Mitigation lands shall be protected under a conservation easement funded by a management endowment. Any variations from the requirements in this measure shall be subject to approval by CDFW. Final preserve boundaries shall also be subject to CDFW approval, as enforced through the State Incidental Take Permit (ITP) process, and shall be subject to the "No Jeopardy" standard. **MM BIO-1m: Compensation for Loss of Tricolored Blackbird Habitat** Planning for the preserve proposed to compensate for losses of special-status species habitat in MP Area 1 shall take into account impacts on tricolored blackbird foraging habitat. At a minimum, compensatory mitigation shall be	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	provided at a 1:1 ratio (1 acre of compensatory habitat provided for each acre of development). This ratio shall be adjusted if and as required by the California Department of Fish and Wildlife (CDFW). **MM BIO-1n: American Badger Surveys and Den Protection** Prior to construction in each of the Vista Ranch Development phases, the applicant shall retain a qualified Biologist to conduct surveys for American badger. Surveys shall be conducted no less than 14 days and no more than 30 days prior to the beginning of construction (inclusive of mobilization onsite and site preparation) and shall cover all areas of suitable habitat for the species. Any individuals observed shall be allowed to leave the site of their own volition. If a potential den is observed, the Biologist shall determine whether the den is occupied; this may require observation over a period of several days. Occupied dens shall be protected by a 50-foot-wide no-disturbance buffer. If the Biologist determines that the den is, or may be, an occupied natal den, the den shall be protected by a 250-foot-wide no-disturbance buffer. Buffers shall be delineated using orange construction fencing or another suitable measure installed by or under the direct supervision of the Biologist. Buffers shall be configured to allow any badgers present to leave the vicinity of the den. Buffers shall remain in place until the Biologist determines that the den is no longer occupied. In the case of natal dens, this will require periodic observation until the Biologist determines that the young are no longer dependent on the den and parental care for survival, or that the den has been abandoned. **MM BIO-1o: Protection of Other Special-Status Wildlife** Prior to construction in each of the Vista Ranch Development phases, the applicant shall retain a qualified Biologist/Ecologist with experience in the Fresno County area to conduct comprehensive pre-construction surveys for special-status wildlife. Surveys shall be timed to allow follow-up, such as relocation of individuals and/or consultation with resource agency staff if warranted. Surveys shall be designed and implemented in consideration of the particular species with potential to be present, as identified in Table 3.4-3 of the Revised Draft Environmental Impact Report (Revised Draft EIR) and based on current habitat conditions in Master Plan (MP) Area 1; survey methods shall be consistent with prevailing best practices by species and with applicable agency guidance, which is currently available at https://wildlife.ca.gov/Conservation/Survey-Protocols (or updated versions thereof). If no special-status wildlife or sign thereof is observed during the surveys, no further action is required.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	If listed or candidate species or sign(s) thereof are observed on-site, the applicant shall consult with the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS) (depending on the species' listing status), and shall proceed in accordance with agency direction. If non-listed species that qualify for another form of special-status in the State, or sign(s) thereof, are observed on-site, the applicant shall consult with CDFW and proceed in accordance with CDFW direction. Standard CDFW-approved approaches for species protection, such as 50-foot setbacks from potentially occupied American badger dens, shall be implemented prior to consultation with CDFW. Follow-up actions for common (non-listed/non-special-status) species shall be consistent with the Biologist's professional judgment and current prevailing conservation best practices.	
Impact BIO-2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.	***MP Area 2*** Implement **MM BIO-1a** and **MM BIO-2**. **MM BIO-2: Compensation for Loss/Degradation of Sensitive Natural Communities** During development in MP Area 2, sensitive natural communities—i.e., natural communities/vegetation types ranked S1 – S3 in the California Department of Fish and Wildlife's (CDFW's) California Natural Community List or most current equivalent and any identified in local or regional planning documents as sensitive and meriting protection—shall be avoided and protected in place where this is possible without significant loss of habitat function and value. If losses cannot be avoided, or if habitat value would be substantially decreased due to loss of connectivity or proximity to proposed development, compensatory habitat mitigation shall be required. Mitigation shall be provided by the development applicant, in a manner consistent with current prevailing conservation practice, the requirements of any resource agency permits required to authorize development, and the most current version of any applicable CDFW guidelines. Mitigation commitments shall be enforced by the City as Conditions of Approval (COAs) for development.	Less than significant impact with mitigation incorporated.
Impact BIO-3: The proposed project would not have a substantial adverse effect on State or federally protected wetlands	***MP Area 2*** **MM BIO-3a: Wetland Evaluation, Protection, and Compensation**	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
(including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	If the Biological Resources Evaluation (BRE) conducted under Mitigation Measure (MM) BIO-1a identifies the presence of potentially jurisdictional wetlands or other waters within Master Plan (MP) Area 2, the applicant(s) proposing development shall be required to: • retain a qualified Biologist/Ecologist to conduct a preliminary delineation of potentially jurisdictional wetlands and other waters on the development site, consistent with current applicable United States Army Corps of Engineers (USACE) standards; • obtain USACE verification of the preliminary jurisdictional delineation (either an Approved Jurisdictional Determination [AJD] or Preliminary Jurisdictional Determination [PJD] is acceptable); • avoid wetlands and other waters to the extent feasible during development; if impacts on wetlands and other waters cannot be entirely avoided to the satisfaction of the regulatory agency/agencies with jurisdiction (USACE, Regional Water Quality Control Board [RWQCB], and/or the California Department of Fish and Wildlife [CDFW]), obtain aquatic resources permits to authorize impacts on wetlands/waters as a result of development; and • provide mitigation consistent with resource agency requirements identified and enforced through the permit process. **MM BIO-3b: Protection for Wetlands in Smaller Construction Phases** In the event development of any portion of Master Plan (MP) Area 2 occurs in phases with an extent of less than 1 acre, and biological/jurisdictional studies conducted under Mitigation Measure (MM) BIO-1a and/or MM BIO-3a have determined that wetlands or other jurisdictional waters are present within or adjacent to the construction disturbance footprint (inclusive of access and staging), the following requirements shall apply. If alternate requirements that are equally or more protective are identified through the State or federal aquatic resources permitting process(es), those shall be substituted. • Work in immediate proximity to wetlands/waters “to remain” shall be limited to the dry season. • No work shall occur during rain or within 24 hours following any rainfall event of 0.25 inch or more of rain in a 24-hour period. • Best management practices (BMPs) shall be implemented for all ground-disturbing activities to prevent siltation and contaminated runoff to wetlands and water bodies within and adjacent to the work area. • BMPs shall include, but may not be limited to, the following:	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	– Before work begins, a qualified Biologist/Ecologist shall delineate sensitive habitat (i.e., wetlands, other jurisdictional waters, and riparian habitat) to be avoided, using temporary construction fencing, or another appropriate low-impact/high-visibility medium. No entry of personnel, equipment, or materials shall be permitted into delineated avoidance areas; – Runoff and sediment control measures such as straw wattles, filter rolls, filter fences, and/or silt fences shall be used to contain disturbed soil materials during excavation and other ground disturbance. Runoff control shall be in place prior to groundbreaking. If straw wattles are used, they shall consist of certified sterile, weed-free rice straw or similar, suitable for use in sensitive habitat. If filter fences or mesh are used, they shall consist of materials, and employ a design, approved by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS) as safe for amphibians and reptiles. No monofilament materials shall be used; – If ground disturbance occurs in a vegetated area that is not planned for immediate construction, hardscaping, or landscaping, the disturbed area shall be reseeded as soon as feasible following the completion of work, using a certified weed-free native species seed mix appropriate to the project region and approved by a qualified Biologist/Ecologist; – Excavation spoils, fill, aggregate, and similar granular materials shall be stockpiled away from sensitive habitat, in areas that are relatively level, and relatively free of vegetation. Stockpiles shall be located as far as reasonably feasible from the limits of sensitive habitat, and runoff control measures as described above shall be used to prevent delivery of sediment to wetlands, other waters, and riparian areas. If wattles are used, they shall consist of certified sterile, weed-free materials, as identified above; no monofilament materials shall be used. Any excavated materials not planned for reuse on-site shall be promptly removed to appropriate permanent disposal locations; – Substances potentially harmful to water quality and/or aquatic life shall be contained in water-tight containers and stored away from water bodies; – All diesel- and gasoline-powered construction equipment and tools, including generator units, shall be inspected for leaks and damage prior to mobilization, and leaks shall be repaired before equipment/tools are brought on-site; – Fueling, lubrication, and maintenance of vehicles and equipment shall be conducted as far as reasonably feasible from wetlands and waterbodies and shall take place off-site, if possible. Equipment staging shall also	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	be located as far as reasonably feasible from wetlands and water bodies. If on-site fueling, maintenance, or repairs are required, containment measures such as drip pans shall be required; – The contractor shall be required to develop a Spill Response Plan for City approval. The Spill Response Plan shall detail actions to be taken in response to spills and discharges of fuels, lubricants, concrete/concrete washout, and any other substances potentially harmful to water quality and/or aquatic life; – During all work, appropriate types and quantities of materials shall be maintained on-site to contain any spills or releases of materials and prevent them from entering sensitive habitat and jurisdictional waters; – In the event of a spill, appropriate spill response procedures shall be initiated as soon as the incident is discovered. The contractor shall be required to notify City staff as soon as feasible, and in no case more than 24 hours after the occurrence; a designated City contact shall be specified in the project construction documents for this purpose. If there is any potential for the spill to enter jurisdictional waters, the City shall notify the Regional Water Quality Control Board (RWQCB) and CDFW and shall proceed in accordance with agency direction. The United States Army Corps of Engineers (USACE) shall also be consulted if construction is subject to federal permit requirements; and – No concrete shall be poured if the 5-day forecast indicates the potential for rain. For concrete pouring in proximity to water bodies, (1) backup containment structures shall be put in place to ensure that no concrete or concrete runoff enters wetlands or waters, and (2) a designated concrete monitor shall oversee concrete pouring to ensure that containment structures are functioning properly. ***Vista Ranch Development/MP Area 1*** **MM BIO-3c: Wetland Protection and Compensation** In addition to Clean Water Act (CWA) Section 404 permitting as required by Mitigation Measure (MM) BIO-1e, the Vista Ranch Development applicant shall complete the CWA Section 401 permitting process and enter into a Streambed Alteration Agreement with the California Department of Fish and Wildlife (CDFW) per California Fish and Game Code (FGC) Section 1602 and shall obtain the necessary aquatic resources permits from the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and the CDFW. The applicant shall then be responsible for implementing all permit conditions relative to jurisdictional wetlands and other waters, including Avoidance and Minimization Measures (AMMs) and habitat compensation.	

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact BIO-4: 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 wildlife nursery sites.	***MP Area 2*** Implement **MM BIO-1a**. ***Vista Ranch Development/MP Area 1*** Implement **MM BIO-1e**, **MM BIO-1i**, and **MM BIO-1j**.	Less than significant impact with mitigation incorporated.
Impact BIO-5: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	***Vista Ranch Development/MP Area 1*** Implement **MM BIO-1e, MM BIO-1f, MM BIO-1g, MM BIO-1h, MM BIO-1i, MM BIO-1j, MM BIO-1l, MM BIO-1m, MM BIO-1n**, and **MM BIO-3c**.	Less than significant impact with mitigation incorporated.
Impact BIO-6: The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.	None.	N/A
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to	***MP Area 2*** Implement project-specific **MM BIO-1a**, **MM BIO-1b, MM BIO-2, MM BIO-3a,** and **MM BIO-3b**; no additional mitigation is required at the cumulative level.	Less than cumulatively considerable contribution with project-specific

Impacts	Mitigation Measures	Level of Significance After Mitigation
biological resources with project-specific mitigation incorporated.	***Vista Ranch Development/MP Area 1*** Implement project-specific **MM BIO-1c** through **MM BIO-1o** and **MM BIO-3c**; no additional mitigation is required at the cumulative level.	mitigation incorporated.
Section 3.5—Cultural Resources and Tribal Cultural Resources		
Impact CUL-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	***MP Area 2*** **MM CUL-1a:** Prior to project approval for all future projects within Master Plan (MP) Area 2 subject to discretionary approval under the California Environmental Quality Act (CEQA), a qualified professional shall conduct a records search and literature review through the California Historical Resources Information System (CHRIS) to identify known historical resources within the project area. If no prior survey exists or if existing data is outdated (more than 10 years old), a qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards, in coordination with a qualified Architectural Historian, shall conduct a field survey to identify and evaluate potential cultural resources that may be considered significant pursuant to CEQA Guidelines Section 15064.5. If cultural resources are identified, project designs shall be modified to avoid impacts to identified cultural resources. If avoidance is not possible, the City shall require appropriate treatment measures such as recording, relocation, or preservation in place. ***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM CUL-1b:** If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology shall be retained to evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find: • If the professional Archaeologist determines that the find does not represent a cultural resource, work may resume immediately with no agency notifications required. • If the professional Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the Archaeologist shall immediately notify the Lead Agency (City of Clovis). The Lead Agency shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	property under Section 106 of the National Historic Preservation Act (NHPA), if applicable. Work may not resume within the no-work radius until the Lead Agency, through consultation as appropriate, determines either: (1) that the site is not a Historical Resource under CEQA or a Historic Property under Section 106; or (2) that the treatment measures have been completed to their satisfaction. • If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The Archaeologist shall notify the Fresno County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner shall notify the Native American Heritage Commission (NAHC), which then shall designate a Native American Most Likely Descendant (MLD) for the project (PRC § 5097.98). The designated MLD shall have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (PRC § 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (PRC § 5097.98). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the Lead Agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction.	
Impact CUL-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	***MP Area 2*** Implement **MM CUL-1a** and **MM CUL-1b.** ***Vista Ranch Development/MP Area 1*** Implement **MM CUL-1b.**	Less than significant impact with mitigation incorporated.
Impact CUL-3: The proposed project would not disturb human	***MP Area 2 and Vista Ranch Development/MP Area 1*** Implement **MM CUL-1b.**	Less than significant impact

Impacts	Mitigation Measures	Level of Significance After Mitigation
remains, including those interred outside of formal cemeteries.		with mitigation incorporated.
Impact TCR-1: The proposed project would not 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 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).	***MP Area 2*** Implement **MM CUL-1a** and **MM CUL-1b.** ***Vista Ranch Development/MP Area 1*** Implement **MM CUL-1b**.	Less than significant impact with mitigation incorporated.
Impact TCR-2: The proposed project would not 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	***MP Area 2*** Implement **MM CUL-1a** and **MM CUL-1b.** ***Vista Ranch Development/MP Area 1*** Implement **MM CUL-1b**.	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is 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.		
Cumulative Impact: The proposed project would have a less than significant cumulative impact related to cultural resources and Tribal cultural resources.	None.	N/A
Section 3.6—Energy		
Impact ENER-1: The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	None.	N/A
Impact ENER-2: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impact: The proposed project would have a less than significant cumulative impact related to energy.	None.	N/A
Section 3.7—Geology, Soils, and Seismicity		
Impact GEO-1: The proposed project would not 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.	***MP Area 2*** **MM GEO-1a:** Prior to the issuance of grading or building permits, the project applicant shall retain a qualified geotechnical engineer to prepare a site-specific geotechnical investigation consistent with the California Building Standards Code (CBC) and applicable local regulations. The investigation shall evaluate site-specific soil, seismic, and geologic conditions. The geotechnical report shall include design and construction recommendations to ensure the safety and stability of proposed structures and infrastructure. All recommendations contained in the approved geotechnical report shall be incorporated into the final project design and implemented during construction. The City of Clovis Engineering and Building Divisions shall verify compliance with the report's recommendations prior to issuance of grading and building permits and during field inspections. ***Vista Ranch Development/MP Area 1*** **MM GEO-1b:** The recommendations and earthwork specifications included in the Geotechnical Engineering Investigations prepared by Krazan and Associates, Inc. on March 10, 2021, and January 31, 2024, and the Geotechnical Feasibility Evaluation prepared by Krazan & Associates, Inc. on December 7, 2023, and revised January 4, 2024, shall be incorporated into the proposed Vista Ranch Development's design. The final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in these reports have been incorporated into the final design of the Vista Ranch Development to the satisfaction of the City of Clovis Engineering and Building Divisions.	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	***Vista Ranch Development/MP Area 1*** Implement **MM GEO-1b**.	Less than significant impact with mitigation incorporated.
Impact GEO-3: The proposed project would not be located on a geological 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.	None.	N/A
Impact GEO-4: The proposed project would not be located on expansive soil, creating substantial direct or indirect risks to life or property.	***Vista Ranch Development/MP Area 1*** Implement **MM GEO-1b**.	Less than significant impact with mitigation incorporated.
Impact GEO-5: The proposed project would not 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.	None.	N/A
Impact GEO-6: The proposed project would not directly or	***MP Area 2 and Vista Ranch Development/MP Area 1***	Less than significant impact

Impacts	Mitigation Measures	Level of Significance After Mitigation
indirectly destroy a unique paleontological resource or site or unique geologic feature.	**MM GEO-6:** Prior to approval of a grading permit, the City shall verify that grading and improvement plans are notated with the following requirement: "If any paleontological resources are found during grading and construction activities of the proposed project, all work shall be halted immediately within a 200-foot radius of the discovery until a qualified Paleontologist has evaluated the find. Work shall not continue at the discovery site until the Paleontologist evaluates the find and makes a determination regarding the significance of the resource and identifies recommendations for conservation of the resource, including preserving in place or relocating on the SOI Expansion Area, or collecting the resource and documenting the find with the University of California Museum of Paleontology."	with mitigation incorporated.
Cumulative Impact: The proposed project would have a less than significant cumulative impact related to geology, soils, and seismicity.	None.	N/A
Section 3.8—Greenhouse Gas Emissions		
Impact GHG-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM GHG-1a: Implement GHG Emission Reduction Measures During Construction.** The applicant and/or contractor associated with development of sites within the Master Plan Area shall implement the following measures during construction and, where specified below, shall submit reports demonstrating compliance to the Planning Division for its review and approval. • The applicant shall limit all equipment and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 2 minutes. The applicant shall also install clear signage regarding the limitation on idling time at the delivery driveway and loading areas. • The applicant shall verify that all construction equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction activities using diesel-powered and/or gasoline powered vehicles or equipment, the applicant shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into the delivery driveway and loading areas. The applicant shall use electric construction equipment unless such equipment is unavailable. The applicant shall submit a report by the certified mechanic of the condition	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	construction-related vehicles and equipment, along with justification regarding availability and feasibility of electric equipment, to the Planning Division prior to commencement of their use. **MM GHG-1b: Restrict use of natural gas in new development.** Future design and operation of residential sites within the Master Plan Area shall be all-electric, eliminating the use of any natural gas-fueled appliance or building feature. **MM GHG-1c: Implement all-electric landscaping equipment.** At operation, all landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City's Planning Division to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric-powered. **MM GHG-1d: Require electric vehicle (EV) charging infrastructure that meets the California Green Building Standards Code (CALGreen) Tier 2 voluntary requirements.** New residential buildings shall provide EV spaces as required by CALGreen Tier 2. **MM GHG-1e: Unbundle parking costs.** Require that parking costs be unbundled from costs to rent or own a residential unit in any multi-family residential unit. This measure shall be documented and enforced through project lease agreements, condominium bylaws, or tenant materials. Prior to issuance of final occupancy permits, the City shall verify that unbundling provisions are included in all lease or sales documents and marketing materials.	
Impact GHG-2: The proposed project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.	***MP Area 2 and Vista Ranch Development/MP Area 1*** Implement **MM GHG-1a**, **MM GHG-1b**, **MM GHG-1c**, **MM GHG-1d**, and **MM GHG-1e.**	Significant and unavoidable impact.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impact: The proposed project would have a significant and unavoidable cumulative impact related to greenhouse gas emissions.	***MP Area 2 and Vista Ranch Development/MP Area 1*** Implement project-specific **MM GHG-1a**, **MM GHG-1b**, **MM GHG-1c**, **MM GHG-1d**, and **MM GHG-1e;** no additional mitigation is required or available at the cumulative level.	Significant and unavoidable impact.
Section 3.9—Hazards and Hazardous Materials		
Impact HAZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	None.	N/A
Impact HAZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.	***MP Area 2*** **MM HAZ-2a:** Prior to the issuance of a grading permit, the property owners and/or developers of properties within Master Plan Area 2 (MP Area 2) shall ensure that a Phase I Environmental Site Assessment (Phase I ESA) (performed in accordance with the current Airborne Toxic Control Measures [ATCM] Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process [E 1527]) shall be conducted for each individual property prior to development or redevelopment to ascertain the presence or absence of Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), and Potential Environmental Concerns (PECs) relevant to the property under consideration. The findings and conclusions of the Phase I ESA shall become the basis for potential recommendations for follow-up investigation. **MM HAZ-2b**: In the event that the findings and conclusions of the Phase I Environmental Site Assessment (Phase I ESA) for a property result in evidence of Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs) and/or Potential Environmental Concerns (PECs) requiring further investigation, the property owners and/or developers of properties shall ensure that a Phase II ESA is conducted to determine the presence or absence of a significant impact to the subject site from hazardous materials. The Phase II ESA may include but may not be limited to the following: (1) Collection and laboratory analysis of soils and/or groundwater	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	samples to ascertain the presence or absence of significant concentrations of constituents of concern; (2) Collection and laboratory analysis of soil vapors and/or indoor air to ascertain the presence or absence of significant concentrations of volatile constituents of concern; and/or (3) Geophysical surveys to ascertain the presence or absence of subsurface features of concern such as underground storage tanks (USTs), drywells, drains, plumbing, and septic systems. The findings and conclusions of the Phase II ESA shall become the basis for potential recommendations for follow-up investigation, site characterization, and/or remedial activities. **MM HAZ-2c:** In the event the findings and conclusions of the Phase II Environmental Site Assessment (Phase II ESA) reveal the presence of significant concentrations of hazardous materials warranting further investigation, the property owners and/or developers of properties shall ensure that site characterization shall be conducted in the form of additional Phase II ESAs in order to characterize the source and maximum extent of impacts from constituents of concern. The findings and conclusions of the site characterization shall become the basis for formation of a remedial action plan and/or risk assessment. **MM HAZ-2d:** If the findings and conclusions of the Phase II Environmental Site Assessment (Phase II ESA), site characterization and/or risk assessment demonstrate the presence of concentrations of hazardous materials exceeding regulatory threshold levels, prior to the issuance of a grading permit, property owners and/or developers of properties shall complete site remediation and potential risk assessment with oversight from the applicable regulatory agency including, but not limited to, the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) or Regional Water Quality Control Board (RWQCB), and Fresno County Environmental Health Division (FCEHD). Potential remediation could include the removal or treatment of water and/or soil. If removal occurs, hazardous materials shall be transported and disposed at a hazardous materials permitted facility. **MM HAZ-2e:** Prior to the issuance of a building permit for an individual property within the Master Plan Area 2 (MP Area 2) with residual environmental contamination, the agency with primary regulatory oversight of environmental conditions at such property ("Oversight Agency") shall have determined that the proposed land use for that property, including proposed development features and design, does not present an unacceptable risk to human health, if applicable, through the use of an Environmental Site Management Plan (ESMP) that could include institutional controls, site-specific mitigation measures, a risk management plan, and deed restrictions based upon applicable	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	risk-based cleanup standards. Remedial action plans, risk management plans and health and safety plans shall be required as determined by the Oversight Agency for a given property under applicable environmental laws, if not already completed, to prevent an unacceptable risk to human health, including workers during and after construction, from exposure to residual contamination in soil and groundwater in connection with remediation and site development activities and the proposed land use. **MM HAZ-2f:** For those sites with potential residual volatile organic compounds (VOCs) in soil, soil gas, or groundwater that are planned for redevelopment with an overlying occupied building, a vapor intrusion assessment shall be performed by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into the proposed building, the project design shall include vapor controls or source removal, as appropriate, in accordance with Regional Water Quality Control Board (RWQCB), the California Department of Toxic Substances Control (DTSC) or the Fresno County Environmental Health Division (FCEHD) requirements. Soil vapor mitigations or controls could include passive venting and/or active venting. The vapor intrusion assessment and associated vapor controls or source removal can be incorporated into the Environmental Site Management Plan (ESMP) (MM HAZ-2e). **MM HAZ-2g:** In the event of planned renovation or demolition of residential and/or commercial structures on the subject site, prior to the issuance of demolition permits, asbestos and lead-based paint (LBP) surveys shall be conducted in order to determine the presence or absence of asbestos-containing materials (ACM) and/or LBP. Removal of friable ACM, and non-friable ACMs that have the potential to become friable, during demolition and/or renovation shall conform to the standards set forth by the National Emissions Standards for Hazardous Air Pollutants (NESHAPs). The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the responsible agency on the local level to enforce the NESHAPs and shall be notified by the property owners and/or developers of properties (or their designee(s)) prior to any demolition and/or renovation activities. If asbestos-containing materials are left in place, an Operations and Maintenance Program (O&M Program) shall be developed for the management of asbestos-containing materials (ACM).	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	MM HAZ-2h: Prior to the import of a soil to a particular property within the Master Plan Area 2 (MP Area 2) as part of that property's site development, such soils shall be sampled for toxic or hazardous materials to determine whether concentrations exceed applicable Environmental Screening Levels for the proposed land use at such a property, in accordance with Regional Water Quality Control Board (RWQCB), the Fresno County Environmental Health Division (FCEHD), and the California Department of Toxic Substances Control (DTSC), including but not limited to the DTSC 2001 Information Advisory Clean Imported Fill Material Fact Sheet, which identifies land use activities appropriate for a fill material source area and provides guidelines for types of analyses to be performed, prior to importing to such a property. ***Vista Ranch Development/MP Area 1*** **MM HAZ-2i:** Prior to the acceptance of improvements, the project proponent shall hire a licensed well contractor to obtain a well abandonment permit from Fresno County Department of Public Health Environmental Health Division, and properly abandon the on-site domestic water wells, septic and leach field system, propane fuel tanks, and irrigation and well pump, pursuant to review and approval of the City Engineer and the Fresno County Department of Public Health Environmental Health Division. **MM HAZ-2j:** Prior to any grading or construction activities in the vicinity of the abandoned Contractor's Corp Yard, removal of the 8-foot by 8-foot UST, including any associated pipes or wires, shall be undertaken in accordance with all applicable local, State and federal regulations. **MM HAZ-2k:** Prior to the issuance of any grading or building permits, the project applicant shall retain a qualified environmental professional to conduct a Phase II Limited Subsurface Survey (LSS) to assess the potential presence of an Underground Storage Tank (UST) on the project site. This investigation shall be performed in accordance with the recommendations outlined in the 2023 Phase I Environmental Site Assessment (2023 Phase I ESA), which identified the potential for a UST based on historical site use and visual indicators. The Phase II LSS shall include, but not be limited to, geophysical testing (e.g., ground-penetrating radar), soil sampling, and laboratory analysis to determine the presence of petroleum hydrocarbons or other hazardous substances associated with USTs. If a UST is confirmed, the applicant shall prepare and implement a remediation plan in coordination with the appropriate regulatory agencies, including the Regional Water Quality Control Board	

Impacts	Mitigation Measures	Level of Significance After Mitigation
	(RWQCB) and the local Certified Unified Program Agency (CUPA). All investigative and remedial activities shall be prior to the issuance of any grading permits and shall comply with applicable federal, State, and local regulations. Documentation of the completed Phase II LSS and any required remediation shall be submitted to the lead agency for review and approval prior to the issuance of any grading permits. **MM HAZ-2l:** The project proponent shall hire a qualified consultant to perform additional testing prior to the issuance of grading permits for construction activities in the following areas that have been deemed to have potentially hazardous conditions present: • Prior to the disturbance of any suspect ACMs or LBP at the subject site, via renovation or demolition, comprehensive ACM and LBP surveys shall be required. • During the removal of debris from the site in preparation for grading and construction activities associated with the proposed residential development, should indications of potential hazardous materials or evidence of impacted soil be observed, the applicant shall be contracted to determine whether surficial soils have been potentially impacted and whether sampling would be recommended. In addition, debris shall be removed and transported off-site for proper disposal.	
Impact HAZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	***MP Area 2*** Implement **MM HAZ-2a** through **MM HAZ-2h** and **MM NOI-1a**. ***Vista Ranch Development/MP Area 1*** Implement **MM HAZ-2i** through **MM HAZ-2l** and **MM NOI-1a**.	Less than significant impact with mitigation incorporated.
Impact HAZ-4: The proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.		
Impact HAZ-5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project would not result in a safety hazard or excessive noise for people residing or working the project area.	None.	N/A
Impact HAZ-6: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	None.	N/A
Impact HAZ-7: The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.	None.	N/A
Cumulative Impact: The proposed project would have a less than significant cumulative impact	None	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
related to hazards and hazardous materials.		
Section 3.10—Hydrology and Water Quality		
Impact HYD-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	None.	N/A
Impact HYD-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	None.	N/A
Impact HYD-3: The proposed project would not 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;	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
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.		
Impact HYD-4: The proposed project would not be located in a flood hazard zone, tsunami, or seiche zone, or risk release of pollutants due to project inundation.	***MP Area 2*** **MM HYD-4:** For any future development proposed on parcels with Assessor Parcel Numbers (APNs) 558-010-17S and/or 558-010-15 within 500 feet of the toe of the Big Dry Creek Reservoir, the project applicant shall maintain a minimum 500-foot Open Space–Corridor, park, or equivalent non-structural land use buffer from the reservoir unless a qualified Geotechnical Report prepared by a California-licensed Geotechnical Engineer demonstrates that development at a reduced setback would be geotechnically supported. The Geotechnical Report shall: 1. Evaluate site-specific dam-related geotechnical conditions (including slope stability, subsurface conditions, and potential inundation-related hazards). 2. Identify the minimum safe development setback from the reservoir based on site conditions. 3. Provide specific design and engineering recommendations (e.g., excavation, grading, interceptor trenches, foundations, or other measures) necessary to ensure that development within the recommended setback would not expose people or structures to a significant hazard. If the Geotechnical Report concludes that development closer than 500 feet is not feasible or safe, the default 500-foot Open Space buffer shall be required.	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	Prior to approval of any future subdivision map, site plan, grading permit, or development application within 500 feet of the reservoir, the City of Clovis shall: • Review and approve the Geotechnical Report for adequacy; and • Ensure that all project plans incorporate the required setback and all geotechnical recommendations.	
Impact HYD-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	None.	N/A
Cumulative Impact: The proposed project would have a less than significant cumulative impact related to hydrology and water quality	None.	N/A
Section 3.11—Land Use and Planning		
Impact LAND-1: The proposed project would not physically divide an established community.	None.	N/A
Impact LAND-2: The proposed project would not 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.	None.	N/A
Cumulative Impact: The proposed project would have a less than	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
significant cumulative impact related to land use and planning.		
Section 3.12—Noise		
Impact NOI-1: The proposed project would not generate 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.	***MP Area 2*** **MM NOI-1a: Construction Noise Mitigation Plan.** All of the following measures shall be implemented during construction. Prior to issuance of building permits, the following language shall be included, verbatim, in the general notes section of all the civil plan construction documents. • The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers which are in good condition and appropriate for the equipment. • The construction contractor shall ensure that unnecessary idling of internal combustion engines is prohibited. • The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists. • At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences. • The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the SOI Expansion Area. • The construction contractor shall ensure that all on-site construction activities, including the operation of any tools or equipment used in construction, drilling, repair, alteration, grading, or demolition work, are limited to between the hours of 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, except that from June 1 through September 15, construction activity may start after 6:00 a.m. Monday through Friday. **MM NOI-1b: Stationary Source Noise Reduction Plan.** Prior to issuance of building permits, the property owner/developer shall implement the following measures to limit operational stationary noise source impacts:	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• Any proposed development projects that include unshielded parking areas within 90 feet, or unshielded truck loading docks within 325 feet, or unshielded mechanical ventilation equipment systems within 30 feet of a noise-sensitive receptor, shall demonstrate compliance with the City of Clovis Municipal Code (CMC) Section 15-2506 by submitting a site-specific acoustic study. These reports shall demonstrate that the proposed project incorporates sufficient noise attenuation features, if needed, to meet the City's exterior/interior noise performance standards. The individual project owner/developer shall submit the acoustic study to the Planning Director, or their designee, for review and approval. Upon approval by the City, the proposed acoustical design features shall be incorporated into the proposed development. Noise reduction design features may include, but are not limited to, locating stationary noise sources on the site to be shielded by structures (buildings, enclosures, or sound walls) or by using equipment that has a quieter rating.	
Impact NOI-2: The proposed project would not result in generation of excessive ground borne vibration or ground borne noise levels.	***MP Area 2*** **MM NOI-2**: The following measures shall be implemented where vibration levels due to construction activities would exceed 0.2 inch per second (in/sec) peak particle velocity (PPV) at nearby buildings to reduce the impact to a less than significant level: • Prohibit the use of heavy vibration-generating construction equipment within 30 feet of adjacent residential buildings. • Use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 30 feet of off-site structures. Only use the static compaction mode when compacting materials within 15 feet of residential buildings. • Prohibit dropping heavy equipment and alternative methods for breaking up existing pavement, such as a pavement grinder, within 30 feet of adjacent residential buildings. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.	Less than significant impact with mitigation incorporated.
Impact NOI-3: The proposed project would not expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport.		
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to noise.		N/A
Section 3.13—Population and Housing		
Impact POP-1: The proposed project would not 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).	None.	N/A
Impact POP-2: The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction or replacement housing elsewhere.	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impact: The proposed project would have a less than significant impact related to population and housing.	None.	N/A
Section 3.14—Public Services		
Impact PUB-1: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.	None.	N/A
Impact PUB-2: The proposed project could 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	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.		
Impact PUB-3: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.	None.	N/A
Impact PUB-4: The proposed project would not 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,	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
in order to maintain acceptable service ratios, response times or other performance objectives for parks.		
Impact PUB-5: The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.	None.	N/A
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to public services.	None.	N/A
Section 3.15—Recreation		
Impact REC-1: The proposed project would not increase the use of existing neighborhood and	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.		
Impact REC-2: The proposed project would include recreational facilities but would not require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.	None.	N/A
Cumulative Impact: The proposed project would have a less than significant impact related to recreation.	None.	N/A
Section 3.16—Transportation		
Impact TRANS-1: The proposed project would not conflict with a program plan, ordinance, or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities.	None.	N/A
Impact TRANS-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM TRANS-2**: Future employers within the Master Plan Area shall implement a voluntary commute trip reduction program, consistent with other trip reduction programs in the City of Clovis (City). Such programs shall include the following components: • trip reduction targets,	Significant and unavoidable impact.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	• measures to discourage single occupancy vehicles while encouraging alternative modes of transportation such as carpooling, ride sharing, vanpooling, subsidized transit passes and other benefits, • provisions for guaranteed rides home for eligible employees, • establishment of applicable fees and funding mechanisms, • defined monitoring measures and frequency, and strategies for non-compliance.	
Impact TRANS-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM TRANS-3a:** Install all-way stop control and enhance visibility of intersection controls at the intersection of Minnewawa and International Avenues. If the agency having jurisdiction over the intersection determines that all-way stop control will not be approved based on volume warrants, the mitigation measure shall include only enhancing visibility of intersection controls by installing stop beacons to the stop signs in accordance with the California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05 and installation of W4-4P "CROSS TRAFFIC DOES NOT STOP" plaques be installed beneath the existing stop signs. **MM TRANS-3b:** Enhance visibility of intersection controls at the intersection of Minnewawa and Behymer Avenues by installing stop beacons to the stop signs in accordance with California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05. **MM TRANS-3c:** Enhance visibility of intersection controls at the intersection of Sunnyside and Nees Avenues by installing stop beacons to the stop signs on Sunnyside Avenue in accordance with California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05. **MM TRANS-3d:** Install traffic signals at the intersection of Fowler and Perrin Avenues with the following lane configurations: • Westbound: one shared left-turn/right-turn lane • Northbound: one shared through/right-turn lane • Southbound: one left-turn lane and one through lane	Less than significant impact with mitigation incorporated.

Impacts	Mitigation Measures	Level of Significance After Mitigation
	MM TRANS-3e: Install traffic signals at the intersection of Armstrong and Shepherd Avenues with the following lane configurations: • Eastbound: one U-turn lane and two through lanes with a shared right-turn • Westbound: one left-turn lane and one through lane • Northbound: one shared left-turn/right-turn lane **MM TRANS-3f:** Install traffic signals at the intersection of Locan and Shepherd Avenues with the following lane configurations: • Eastbound: one left-turn lane, two through lanes, and one right-turn lane • Westbound: one left-turn lane, two through lanes, and one right-turn lane • Northbound: one shared left-turn/through/right-turn lane • Southbound: one shared left-turn/through and one right-turn lane	
Impact TRANS-4: The proposed project would not result in inadequate emergency access.	***MP Area 2 and Vista Ranch Development/MP Area 1*** **MM TRANS-4:** The applicant/developer shall prepare a traffic control plan for each phase of development that shall specify traffic controls required to maintain adequate circulation and access during construction and access to all existing businesses and residences shall be maintained. The traffic control plans shall be subject to approval by the agencies having jurisdiction over the roadways, including police, sheriff, and fire departments, prior to commencement of construction.	Less than significant impact with mitigation incorporated.
Cumulative Impact: The proposed project would have a significant and unavoidable cumulative impact related to transportation.	No feasible cumulative mitigation.	Significant and unavoidable impact.
Section 3.17—Utilities and Service Systems		
Impact UTIL-1: The proposed project would not require or result in the relocation or construction of new or expanded water,	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.		
Impact UTIL-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	None.	N/A
Impact UTIL-3: The proposed project would not 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.	None.	N/A
Impact UTIL-4: The proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
otherwise impair the attainment of solid waste reduction goals.		
Impact UTIL-5: The proposed project would comply with federal, State, and local statutes and regulations related to solid waste.	None.	N/A
Cumulative Impact: The proposed project would have a less than cumulatively considerable contribution to potentially significant cumulative impacts related to utilities and service systems.	None.	N/A
Section 3.18—Wildfire		
Impact WILD-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	None.	N/A
Impact WILD-2: The proposed project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire.	None.	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact WILD-3: The proposed project would not 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 on the environment.	None.	N/A
Impact WILD-4: The proposed project would not 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.	None.	N/A
Cumulative Impact: The proposed project would have a less than significant impact related to wildfire.	None.	N/A

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CHAPTER 1

1 - INTRODUCTION

1.1 - Overview of the CEQA Process

This Revised Draft Environmental Impact Report (Revised Draft EIR) is prepared in accordance with the California Environmental Quality Act (CEQA) to evaluate the potential environmental impacts associated with the implementation of the Vista Ranch Project (State Clearinghouse No. 2023100508). This document is prepared in conformance with CEQA (California Public Resources Code [PRC], § 21000, *et seq*.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000, *et seq*.). This Revised Draft EIR is intended to serve as an informational document for the public agency decision-makers and the public regarding the proposed project.

1.1.1 - Overview

The proposed project consists of an expansion of the City of Clovis's (City's) Sphere of Influence (SOI) to include the approximately 952-acre SOI Expansion Area, which is currently outside of the SOI boundary (SOI Expansion). The proposed project would also adopt a comprehensive Vista Ranch Master Plan (Master Plan) to guide development within approximately 507 acres of the SOI Expansion Area. Lastly, the proposed project would implement the Vista Ranch Development, which would develop approximately 368 acres of the Master Plan Area with mixed uses over a buildout period of approximately 10 years. Chapter 2, Project Description, provides a complete description of the proposed project.

1.1.2 - Purpose and Authority

This Revised Draft EIR provides a project-level analysis of the environmental effects of portions of the Master Plan (i.e., the approximately 368-acre Vista Ranch Development [MP Area 1]). The Revised Draft EIR performs a program-level analysis of (i) the approximately 139-acre portion of the Master Plan that is not within the Vista Ranch Development (MP Area 2) and (ii) the SOI Expansion and Non-development Area. The environmental impacts of the proposed project are analyzed in the Revised Draft EIR to the degree of specificity appropriate, in accordance with CEQA Guidelines Section 15146. This document addresses the potentially significant adverse environmental impacts that may be associated with the planning, construction, or operation of the proposed project. It also identifies appropriate and feasible mitigation measures and alternatives that may be adopted to significantly reduce or avoid these impacts.

CEQA requires that an EIR contain, at a minimum, certain specific elements. These elements are contained in this Revised Draft EIR and include:

- Table of Contents
- Introduction
- Executive Summary
- Project Description

- Environmental Setting, Significant Environmental Impacts, and Mitigation Measures
- Cumulative Impacts
- Significant Unavoidable Adverse Impacts
- Alternatives to the Proposed Project
- Growth-inducing Impacts
- Effects Found not to be Significant
- Areas of Known Controversy

1.1.3 - Lead Agency Determination

The City of Clovis Planning Division is designated as the Lead Agency for the proposed project. CEQA Guidelines Section 15367 defines the lead agency as ". . . the public agency, which has the principal responsibility for carrying out or approving a project." Other public agencies may use this Revised Draft EIR in the decision-making or permit process and consider the information in this Revised Draft EIR along with other information that may be presented during the CEQA process.

This Revised Draft EIR was prepared by FirstCarbon Solutions (FCS), an environmental consultant. Prior to public review, it was extensively reviewed and evaluated by the City of Clovis. This Revised Draft EIR reflects the independent judgment and analysis of the City of Clovis as required by CEQA. Lists of organizations and persons consulted and the report preparation personnel is provided in Chapter 7 of this Revised Draft EIR.

1.2 - Scope of the Revised Draft EIR

This Revised Draft EIR addresses the potential environmental effects of the proposed project. The revisions provide a comprehensive analysis of both project-level and program-level impacts. The City of Clovis issued a Notice of Preparation (NOP) for the proposed project on March 3, 2025, which circulated between March 3, 2025, and April 2, 2025, for the statutory 30-day public review period. The scope of this Revised Draft EIR includes the potential environmental impacts identified in the NOP and issues raised by agencies and the public in response to the NOP. The NOP is contained in Appendix A of this Revised Draft EIR.

Twenty-seven comment letters were received in response to the NOP for the Revised Draft EIR. They are listed in Table 1-1 and provided in Appendix A of this Revised Draft EIR and addressed in this EIR. The City intends for the Revised Draft EIR to entirely replace the prior draft EIR published July 19, 2024. Comments on the prior NOP and prior draft EIR are part of the administrative record; however, written responses to those comments are not required, and new comments on the Revised Draft EIR must be submitted. (CEQA Guidelines §15088.5(f)(1) and (3)).

Please note that comments marked as "N/A" in the Revised Draft EIR Coverage of Issue Raised column below do not correspond to a CEQA issue requiring analysis in the Revised Draft EIR, are informational in nature, or pertain solely to the previously circulated Draft EIR. Because the City intends for the Revised Draft EIR to entirely replace the prior Draft EIR, comments directed at or based on the prior document are not applicable here and therefore have no corresponding section to reference or respond to in this Revised Draft EIR.

Table 1-1: NOP Comment Letters

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
Public Agencies				
City of Clovis Public Utilities Department	Glenn Eastes	March 6, 2025	• States that the proposed project would be serviced by the City of Clovis Public Utilities, Community Sanitation division.	• Chapter 2, Project Description (p. 2-34)
Native American Heritage Commission (NAHC)	Melina Carlos	February 27, 2025	• Includes standard procedures for Senate Bill (SB) 18 and Assembly Bill (AB) 52.	• Section 3.5, Cultural Resources and Tribal Cultural Resources (pp. 3.5-8 to 3.5-10)
Fresno Irrigation District (FID)	Laurence Kimura, PE, Chief Engineer	March 20, 2025	• States that any additional stormwater discharges into FID facilities shall be determined and agreed upon prior to FID approval.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-36)
			• States that Fresno Metropolitan Flood Control District's (FMFCD's) Big Dry Creek No. 150 shall be given an ample-sized open space corridor with proper channel geometry to maintain a flow capacity of up to 150 cubic-feet per second.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-51 to 3.10-57)
			• States that the proposed project is outside of FID's boundary line and is not entitled to water from the Kings River and would have to find alternative sources of water.	• Section 3.17, Utilities and Service Systems (p. 3.17-5)
			• States that FID does not own, operate, or maintain any facilities located on the SOI Expansion Area.	• N/A
			• Expresses concerns that the proposed project would negatively impact local groundwater supplies and contribute to existing groundwater overdraft and recommends that the City require	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			sufficient recharge or imported surface water.	
			• States that the EIR must fully analyze the potential water demands of the development, the available water supplies, and the potential adverse impact of the increased water demands.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• Provides information related to the Sustainable Groundwater Management Act (SGMA) and requests the City consider potential impacts on the City's ability to comply with the SGMA.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43; 3.10-57 to 3.10-60)
			• States that the water supply proposed to be used by the proposed project must be clearly identified, and all potential issues must be fully evaluated and addressed.	• Section 3.17, Utilities and Service Systems (pp. 3.17-5; 3.17-27 to 3.17-30)
			• Encourages the City to continue toward finding solutions to minimize the impact of land use changes and to mitigate any existing and anticipated water supply impacts.	• Section 3.11, Land Use and Planning (pp. 3.11-14 to 3.11-41) • Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• States that if the proposed project includes any street and/or utility improvements along Fowler Avenue, Sunnyside Avenue, Shepherd Avenue, or in the vicinity of FID's Enterprise 109, FID requires its review and approval.	• N/A
			• States that any potential adverse impacts of the proposed project to FID being able to utilize water from Big Dry Creek must be fully identified and analyzed.	• Section 3.17, Utilities and Service Systems (pp. 3.17-5 to 3.17-6; 3.17-22)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
California Department of Transportation (Caltrans)	Kaylie Schreihans	March 26, 2025	• Requests to be included in the Scope of Work for the Transportation section of the EIR.	• Section 3.16, Transportation (p. 3.16-16)
			• Recommends the City consider creating a Vehicle Miles Traveled (VMT) mitigation impact fee to help reduce potential impacts and fund improvements at the intersection of Temperance Avenue and State Route (SR) 168 as well as the intersection of Owens Mountain Parkway and SR-168.	• Section 3.16, Transportation (pp. 3.16-32 to 3.16-36)
			• States that the City should continue to require mitigation that promotes a well-connected, non-motorized street network, implements a commute trip reduction program, and explores ways to reduce VMT within the SOI Expansion Area.	• Section 3.16, Transportation (pp. 3.16-32 to 3.16-36)
			• Recommends future projects contribute to all applicable impact fee programs.	• Section 3.16, Transportation (p. 3.16-35)
			• Requests revisions and clarifications to the transportation impact analysis.	• Section 3.16, Transportation (Appendix K.3, Supplemental Traffic Analyses)
			• Requests a Synchro analysis on all signalized intersections.	• Section 3.16, Transportation (pp. 3.16-25 to 3.16-26; 3.16-28 to 3.16-31)
California Department of Fish and Wildlife (CDFW)	Julie A. Vance Regional Manager	March 28, 2025	• Recommends referencing prior CDFW comment letters for additional comments and recommendations for the EIR.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-118)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Requests that the Revised Draft EIR reflect the change of State status of burrowing owls and incorporate appropriate mitigation measures to reduce the potential for significant impacts and prevent unauthorized take.	• Section 3.4, Biological Resources (pp. 3.4-24; 3.4-56 to 3.4-58)
			• Requests reporting of special-status species observations to the California Natural Diversity Database and notes that CDFW filing fees would apply upon project approval.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-118)
			• States that the project area contains suitable habitat for numerous special-status wildlife and plant species and recommends conducting appropriate habitat assessments, focused surveys, and impact analyses to support the EIR's biological resources evaluation.	• Section 3.4, Biological Resources (pp. 3.4-3 to 3.4-35; 3.4-45 to 3.4-118)
			• Identifies potential impacts to California tiger salamander and recommends protocol surveys, avoidance and minimization measures, and acquisition of incidental take authorization under the California Endangered Species Act (CESA), if take cannot be avoided.	• Section 3.4, Biological Resources (pp. 3.4-49 to 3.4-53; 3.4-76 to 3.4-79)
			• Notes the project area provides suitable foraging and nesting habitat for Swainson's hawk and recommends nesting surveys and implementation of no-disturbance buffers around active nests, with consultation and take authorization if buffers are infeasible.	• Section 3.4, Biological Resources (pp. 3.4-66 to 3.4-68; 3.4-73 to 3.4-75; 3.4-84 to 3.4-86)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Indicates potential for tricolored blackbird occurrence and recommends habitat assessment, preconstruction breeding surveys, avoidance buffers around active colonies, and consultation if impacts cannot be avoided.	• Section 3.4, Biological Resources (pp. 3.4-68 to 3.4-69; 3.4-73 to 3.4-75; 3.4-84 to 3.4-86)
			• States that suitable habitat may exist for Crotch's bumble bee and recommends habitat assessments, focused surveys, avoidance of nesting features, and consultation or take authorization if necessary.	• Section 3.4, Biological Resources (pp. 3.4-53 to 3.4-56; 3.4-79 to 3.4-80)
			• Notes potential presence of American badger and recommends focused den surveys and implementation of avoidance buffers until dens are inactive.	• Section 3.4, Biological Resources (pp. 3.4-69 to 3.4-70; 3.4-86 to 3.4-87)
			• Identifies the project site as potentially supporting burrowing owl nesting and foraging habitat and recommends surveys and implementation of avoidance buffers consistent with CDFW guidance.	• Section 3.4, Biological Resources (pp. 3.4-56 to 3.4-58; 3.4-80 to 3.4-83)
			• Notes western pond turtle may occur in the project vicinity and recommends focused surveys, avoidance of nests, and minimization of disturbance during construction.	• Section 3.4, Biological Resources (pp. 3.4-59; 3.4-83)
			• States that suitable habitat may exist for western spadefoot and recommends focused surveys, avoidance buffers around burrows, and incorporation of mitigation where impacts occur.	• Section 3.4, Biological Resources (pp. 3.4-60 to 3.4-32; 3.4-83 to 3.4-84)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Identifies potential for special-status plant species and recommends floristic surveys conducted in accordance with CDFW protocols and avoidance or mitigation if such species are present.	• Section 3.4, Biological Resources (pp. 3.4-47 to 3.4-48; 3.4-71 to 3.4-72; 3.4-74 to 3.4-75)
			• Recommends evaluation of impacts related to streambed alteration, artificial lighting effects on wildlife, wildlife movement and habitat connectivity, and cumulative biological impacts.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-118)
Clovis Unified School District (CUSD)	Denver Stairs	April 2, 2025	• States that the proposed project, at a minimum, would need a new elementary school and would require technical studies within the Master Plan Area.	• Section 3.14 Public Services (pp. 3.14-21 to 3.14-24)
			• Requests that a Phase I Environmental Site Assessment (Phase I ESA) and Phase II ESA, if necessary, be prepared for the entire Master Plan Area.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-21 to 3.9-25)
			• Requests that the Revised Draft EIR thoroughly discuss infrastructure improvements to manage potential flooding and provide a thorough analysis of potential flooding due to dam breach.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-51 to 3.10-57)
			• Requests that the Revised Draft EIR include a dam inundation study.	• Section 3.10 Hydrology and Water Quality (pp. 3.10-51 to 3.10-57)
			• Provides a summary of State standards for school site approval.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Provides student generation rates and requests that the City identify the maximum number of each residential unit type to determine the number of students generated by the proposed project.	• Section 3.14, Public Services (pp. 3.14-21 to 3.14-24)
			• States that the proposed project would require that CUSD hire approximately 75 new teachers and staff.	• Section 3.14, Public Services (pp. 3.14-21 to 3.14-24)
			• Requests that the Revised Draft EIR identify the schools that would reach capacity due to the proposed project and consider CUSD's ability to fund all necessary improvements to accommodate the proposed project .	• Section 3.14, Public Services (pp. 3.14-21 to 3.14-24)
			• States that a lack of sufficient school funding may impact various environmental issues, including VMT and greenhouse gas (GHG) emissions.	• Section 3.8, Greenhouse Gas Emissions (p. 3.8-1) • Section 3.16, Transportation (p. 3.16-1)
			• Requests that the Transportation section of the Revised Draft EIR address potential circulation and pedestrian safety impacts at the school site, especially since Shepherd Avenue is identified as an expressway.	• Section 3.16, Transportation (pp. 3.16-38 to 3.16-44)
			• Requests that the Revised Draft EIR account for new teachers and staff in its population and housing analysis.	• Section 3.13, Population and Housing (p. 3.13-9)
			• Provides a list of schools that would potentially be impacted, the current enrollment, and the campus capacity.	• Section 3.14, Public Services (pp. 3.14-21 to 3.14-24)
			• Requests that the Master Plan limit the types of industrial uses allowed in the	• Section 3.11, Land Use and Planning (pp. 3.11-32 to 3.11-33)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			area to be conducive to adjacent school and residential uses.	
			• Requests the Revised Draft EIR evaluate the most intensive uses allowed in the light industrial land use designation to determine environmental impacts.	• Section 3.11, Land Use and Planning (pp. 3.11-35 to 3.11-36)
			• Requests that if the elementary school is developed and operational before the completion of the Vista Ranch Development and Master Plan, the proposed project's staging area be located as far away as possible from the school site.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-29 to 3.9-30)
			• Requests that construction equipment be located away from the school site and implement the best available technology to minimize air and noise pollution during construction, as well as avoid vehicle idling, and adhere to local noise ordinances.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-36; 3.3-46) • Section 3.12, Noise (pp. 3.12-22; 3.12-27 to 3.12-29; 3.12-31 to 3.12-33)
			• States that construction vehicle trips should avoid passing the school site to the greatest extent feasible.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-29 to 3.9-30)
			• Requests that a construction Health Risk Assessment (HRA) be prepared for all construction activities within 1,000 feet of an active school site.	• Section 3.3, Air Quality (pp. 3.3-54 to 3.3-59)
			• Requests that the proposed project provide, and the Revised Draft EIR analyze, mass grading and utility extensions and connections to all “Planning Areas within the Master Plan Area.	• Section 3.17, Utilities and Service Systems (pp. 3.17-21 to 3.17-23)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Provides requirements related to developer fees.	• N/A
San Joaquin Valley Air Pollution Control District (SJVAPCD)	Mark Montelongo, Director of Policy and Government Affairs	April 2, 2025	• Recommends that the Revised Draft EIR incorporate strategies to reduce VMT and require cleanest available heavy-duty trucks, vehicles, and off-road equipment.	• Section 3.3, Air Quality (pp. 3.3-27 to 3.3-61) • Section 3.16, Transportation (pp. 3.16-31 to 3.16-36)
			• Recommends that the Revised Draft EIR incorporate strategies that would advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (ARB's) Freight Handbook Concept Paper, to the extent feasible.	• Section 3.3, Air Quality (p. 3.3-1)
			• Recommends a more detailed preliminary review of the proposed project be conducted for the proposed project's construction and operational emissions.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
			• States that operational air emissions from mobile sources and stationary sources should be analyzed separately and lists a recommended mitigation measure for operational emissions.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
			• Recommends that the Revised Draft EIR include a discussion characterizing an appropriate trip length distance for heavy-duty truck (HHDT) travel and reflect such appropriate distance supported by project-specific factors.	• Section 3.3, Air Quality (p. 3.3-27)
			• States that project-related criteria pollutant emissions should be identified and quantified using the California Emission Estimator Model (CalEEMod).	• Section 3.3, Air Quality (p. 3.3-27)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• States that an HRA should be performed for the proposed project and provides recommendations for protocols and analyses.	• Section 3.3, Air Quality (pp. 3.3-54 to 3.3-59)
			• Recommends that development projects resulting in toxic air contaminant (TAC) emissions should be located an adequate distance from sensitive receptors.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
			• Recommends that an Ambient Air Quality Analysis (AAQA) be performed for the proposed project if emissions exceed 100 pounds per day of any pollutant.	• Section 3.3, Air Quality (pp. 3.3-27 to 3.3-29)
			• Recommends that the Revised Draft EIR also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for the proposed project.	• Section 3.3, Air Quality (pp. 3.3-46 to 3.3-47)
			• Recommends that the Revised Draft EIR include language requiring projects not requiring a project-specific discretionary approval to prepare a technical assessment, in consultation with the SJVAPCD, to determine whether additional analysis and/or mitigation is required.	• Section 3.3, Air Quality (p. 3.3-46)
			• Recommends that the City evaluate heavy-duty truck routing patterns for the proposed project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions.	• Section 3.3, Air Quality (p. 3.3-27)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Recommends measures to reduce operational emissions from HHDT and on-site service equipment.	• Section 3.3, Air Quality (p. 3.3-27)
			• Recommends that the Revised Draft EIR include measures to ensure compliance of the State anti-idling regulation (13 CCR § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors.	• Section 3.3, Air Quality (pp. 3.3-15; 3.3-42)
			• Recommends that the Revised Draft EIR include a measure requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for new large restaurants operating under-fired charbroilers.	• Section 3.3, Air Quality (p. 3.3-46)
			• Suggests that the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors.	• Section 3.3, Air Quality (pp. 3.3-55 to 3.3-59)
			• Recommends that the proposed project proponent consider the SJVAPCD's Clean Green Yard Machines (CGYM) program which provides incentive funding for replacement of existing gas-powered lawn and garden equipment.	• Section 3.3, Air Quality (p. 3.3-46)
			• Suggests that the City consider incorporating solar power systems as an emission reduction strategy for the proposed project.	• Section 3.8, Greenhouse Gas Emissions (p. 3.8-25)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Recommends that the City require all nonresidential buildings be designed to provide electric infrastructure to support the use of on-road zero emissions vehicles, such as medium heavy-duty trucks (MHDT) and HHDT associated with a commercial project.	• Section 3.3, Air Quality (p. 3.3-46)
			• Outlines SJVAPCD rules and regulations applicable to the proposed project.	• Section 3.3, Air Quality (pp. 3.3-16 to 3.3-20)
Fresno Metropolitan Flood Control District (FMFCD)	Denise Wade, Master Plan Special Projects Manager	April 2, 2025	• States that the proposed project shall pay FMFCD drainage fees pursuant to the Drainage Fee Ordinance prior to approval of any final maps and/or issuance of building permits at the rates in effect at the time of such approval.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-33)
			• States applicable requirements for the proposed project related to stormwater drainage.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-33; 3.10-47 to 3.10-48)
			• States that all impacts to stormwater runoff created by increasing densities within Drainage Area “BY1” that affect the capacity of the existing rural drainage system must be fully mitigated.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-47 to 3.10-48)
			• Requests that the grading engineer contact FMFCD as early as possible to review the proposed site grading for verification and acceptance of a mitigation design prior to preparing a grading plan within the Master Plan Area.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-45 to 3.10-48)
			• Recommends that the 250-foot area adjacent to the dam face be kept clear	• Section 3.10, Hydrology and Water Quality (pp. 3.10-52 to 3.10-54)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			of development and designated as open space.	
			• Recommends a 500-foot open space corridor buffer from the toe of the Big Dry Creek Reservoir along the Master Plan Area to Shepherd Avenue, unless the developer provides a Geotechnical Report which recommends that development closer than 500 feet is feasible.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-52 to 3.10-54)
			• Requests an opportunity to review the application prior to submittal of a United States Army Corps of Engineers (USACE) Clean Water Act Section 404 permit application package, if prepared.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-36)
			• States requirements if developer chooses to retain, relocate, or improve channels within the Master Plan Area.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-45 to 3.10-48)
			• Recommends that that the Master Plan Area establishes a homeowner's association (HOA) to maintain drainage channels.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-45 to 3.10-48)
			• Requests specific edits to the Project Description.	• Chapter 2, Project Description
City of Fresno Planning and Development Department	Jennifer Clark, Director Planning and Development	April 2, 2025	• Requests that the Revised Draft EIR include air quality and GHG emissions analysis that considers impacts to the City of Fresno.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-62) • Section 3.8, Greenhouse Gas Emissions (p. 3.8-29)
			• Requests that the Revised Draft EIR provide analysis to show that the region has sufficient electrical energy generation capacity to serve the proposed project without reducing	• Section 3.17, Utilities and Service Systems (pp. 3.17-22; 3.17-24)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			capacity for planned projects in the City of Fresno.	
			• Requests that the Revised Draft EIR provide sufficient analysis that water needed to support the proposed project would not negatively impact water supply in the City of Fresno.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• Requests that the Revised Draft EIR provide sufficient analysis to show how the proposed project affects the capacity of the Fresno-Clovis Wastewater Treatment Plant, and any other wastewater-related impacts to the City of Fresno.	• Section 3.17, Utilities and Service Systems (pp. 3.17-32 to 3.17-33)
			• States that the Revised Draft EIR should provide sufficient analysis to show transportation impacts to the City of Fresno.	• Section 3.16, Transportation (pp. 3.16-25 to 3.16-26)
			• Requests that the Revised Draft EIR provide analysis to show how the substantial population growth may affect the City of Fresno.	• Section 3.13, Population and Housing (pp. 3.13-8 to 3.13-13)
			• Requests a transportation analysis related to how the proposed project would impact traffic operations and pedestrian/bicycle safety, including queueing, for the City of Fresno.	• Section 3.16, Transportation (pp. 3.16-25 to 3.16-26; 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• Requests information regarding whether the City has acquired additional water supplies for the proposed project.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• Requests information regarding what contingency plans exist for maintaining water supply for the project area.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• Requests information regarding whether the proposed project would incorporate any recycled water systems.	• Section 3.17, Utilities and Service Systems (p. 3.17-8)
			• Requests that the Revised Draft EIR address what anticipated sewer flows would be generated by the proposed project.	• Section 3.17, Utilities and Service Systems (pp. 3.17-33 to 3.17-34)
			• Requests information on how the City intends to convey flows generated by the proposed project and future development in the adjusted focus area.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-34)
			• Requests information on what plans are in place for groundwater recharge or downstream replenishment to mitigate potential increased withdrawals.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• Requests information on how the City would manage the reliance on groundwater for the project area.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
County of Fresno Department of Public Works and Planning	Arianna Brown, Planner	April 4, 2025	• Requests the County's Transportation Planning Unit to be included in the review process for any future transportation studies related to the proposed project.	• Section 3.16, Transportation (pp. 3.16-45 to 3.16-46)
			• Requests review of any transportation studies associated with future developments within the Master Plan that would impact Fresno County (County) roads.	• Section 3.16, Transportation (pp. 3.16-45 to 3.16-46)
			• States that as the City annexes fragmented sections of the Master Plan, the City should annex the full	• Section 3.16, Transportation (p. 3.16-20)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			road right-of-way width fronting any future developments that are within or bordering the proposed Specific Plan to avoid any shared roads with the County.	
			• Requests that traffic studies evaluate consistency of right-of-way and classifications of surrounding County roads and the circulation between neighboring cities or communities.	• Section 3.16, Transportation (pp. 3.16-20; 3.16-25 to 3.16-26)
			• States that the Revised Draft EIR should address the loss of the aggregate deposits due to development of the proposed project.	• Chapter 4.0, Effects Found not to be Significant (pp. 4-1 to 4-2)
			• States that NOP comments from the Department of Public Health, Environmental Health Division, on the previously circulated Draft EIR are still applicable to the proposed project.	• N/A
Organizations				
Shepherd/Fowler Property Owners	Nathan George	March 13, 2025	• Requests that the Revised Draft EIR fully analyze and mitigate, where feasible, the potential significant environmental impacts of the proposed project.	• Various
			• Requests that the Revised Draft EIR address the inadequate analysis and comments related to the shortcomings of the previous EIR.	• Various
			• Requests that the Revised Draft EIR address rural residential in the area and the impact to the existing environment.	• Various

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• States CEQA's general requirements for EIRs.	• N/A
			• States that the prior EIR fails to adequately analyze and mitigate the proposed project's significant transportation impacts.	• N/A
			• States that the prior EIR fails to adequately analyze the proposed project's impacts to light and glare.	• N/A
			• States that the prior EIR fails to adequately analyze and mitigate the proposed project's air quality impacts.	• N/A
			• States that the prior EIR fails to adequately analyze and mitigate impacts to biological resources.	• N/A
			• States that the prior EIR fails to adequately analyze impacts to GHG emissions.	• N/A
			• States that the prior EIR fails to adequately analyze the proposed project's impact to groundwater recharge and water supply.	• N/A
			• States that the prior EIR fails to adequately analyze and mitigate noise impacts.	• N/A
			• States that the prior EIR fails to adequately analyze cumulative impacts.	• N/A
			• States that the City has impermissibly segmented environmental analysis of a larger CEQA project.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
Shepherd/Fowler Property Owners	Kati Thomson	March 18, 2025	• States that County roads and infrastructure cannot support this development as it is planned.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-43)
			• Requests that the stated goal to confine ingress/egress to the half-mile grid be reconsidered to reduce potential traffic safety impacts.	• Section 3.16, Transportation (pp. 3.16-38 to 3.16-43)
Shenandoah Ranch Residents	Daniel Bond	March 18, 2025	• Expresses concerns related to traffic safety as a result of the proposed project, including at the intersection of Fowler Avenue and Behymer Avenue.	• Section 3.16, Transportation (pp. 3.16-38 to 3.16-44)
Center for Biological Diversity	Meridith Stevenson	April 2, 2025	• Requests that the Revised Draft EIR thoroughly disclose, analyze, and mitigate the proposed project's anticipated GHG emissions.	• Section 3.8, Greenhouse Gas Emissions (p. 3.8-25)
			• Expresses concern regarding the increased risk of wildfires due to climate change and wildfire impacts on wildlife.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-37 to 3.9-38) • Section 3.18, Wildfire (pp. 3.18-2; 3.18-12)
			• Requests that the Revised Draft EIR disclose, analyze, and mitigate impacts to wildlife movement and habitat connectivity.	• Section 3.4, Biological Resources (pp. 3.4-108 to 3.4-113)
			• Requests that the Revised Draft EIR disclose, analyze, and mitigate impacts to special-status species.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-92)
			• Requests that the Revised Draft EIR thoroughly disclose, analyze, and mitigate the proposed project's impacts to public resources and existing communities.	• Section 3.14, Public Services (pp. 3.14-13 to 3.14-32)
			• States that the proposed project would result in a divestment of infill affordable housing.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• States that the proposed project would result in a divestment of public transit.	• N/A
			• Requests that the Revised Draft EIR thoroughly analyze and mitigate impacts to water supply and water quality.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• Requests that the Revised Draft EIR analyze and mitigate air quality impacts.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-62)
Individuals				
N/A	Surinder Sandhu	March 18, 2025	• States that the developer should widen Shepherd Avenue to a double lane with foot path to accommodate traffic.	• Section 3.16, Transportation (p. 3.16-7)
			• Notes there should be available functioning fire hydrants throughout the proposed development.	• Section 3.18, Wildfire (pp. 3.18-20 to 3.18-22)
			• Requests information on where the ponding basin would be for the proposed project and suggests including at least 3 to 4 ponding tables for water recharge.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• Requests information on how the proposed project would affect future well drilling.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• States concern about whether discharge would be allowed into the existing canal.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-36)
			• Requests information related to tax jurisdiction.	• N/A
			• Requests information regarding whether water pumps can drill in the water basin east of the Dry Creek dam.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
N/A	Jarod Ramirez	March 23, 2025	• States concern related to traffic congestion and safety.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• Requests that no traffic be allowed to be directed to Perrin Road.	• Section 3.16, Transportation (pp. 3.16-25 to 3.16-26; 3.16-38 to 3.16-43)
			• States concern related to groundwater supply and recharge and states there must be a plan for an upgradient water basin.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• Proposes not to develop high density residential uses north of the canal.	• Section 3.11, Land Use and Planning (pp. 3.11-18 to 3.11-19)
			• States concern related to an increase in air, water, and noise pollution.	• Section 3.3, Air Quality (pp. 3.3-35 to 3.3-62) • Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-36) • Section 3.12, Noise (pp. 3.12-21 to3.12-37)
			• States concern related to a loss of natural beauty.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-11 to 3.1-21)
			• Expresses concern related to an increase in housing density and a suggestion to have a minimum of 1 acre lot sizes adjacent to existing development.	• Section 3.11, Land Use and Planning (p. 3.11-19)
			• States concern related to the destruction of animal habitats, including tiger salamander, fox, coyote, owls, and hawks.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-92)
			• States concern related to the loss of privacy and enjoyment, as well as decreased property values.	• N/A
			• States concern related to an increase in crime.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• States concern related to the unwanted annexation into the City.	• N/A
N/A	Andy and Linda Bone	March 27, 2025	• Requests analysis of how additional groundwater pumping for the proposed residential uses would affect existing private wells in the community.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• Requests for monitoring and mitigation plans for potential well failures similar to those experienced near the Shepherd and Sunnyside development in the City.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• Requests verification that the proposed project complies with requirements under the SGMA given the critically over-drafted status of the basin.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43; 3.10-57 to 3.10-58)
			• Requests evidence that the City has considered cumulative impacts of all planned developments in the area on groundwater supplies.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-41 to 3.10-43)
N/A	Andy and Linda Bone	March 28, 2025	• Requests information from where the proposed project would receive water.	• Section 3.17, Utilities and Service Systems (pp. 3.17-3 to 3.17-4)
			• Requests that the Revised Draft EIR include a comprehensive Water Supply Assessment (WSA) that clearly demonstrates sufficient and reliable water supplies exist for this development without negatively impacting existing users or environmental resources.	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• Requests information on any infrastructure improvements needed to deliver water to the SOI Expansion Area and whether these improvements	• Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-33)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			are funded and accounted for in the project planning.	
N/A	Terry and Zetta Graham	3/28/2025	• Opposes the proposed project.	• N/A
			• States that the Big Dry Creek Dam is earth-filled and a High Hazard Potential Classification.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36)
			• States that Fowler Avenue needs to be developed first from Shepherd north to handle any new traffic.	• Section 3.16, Transportation (pp. 3.16-38 to 3.16-43)
			• States that new development should not be stacked up against the Big Dry Creek Dam, leaving a buffer of open space.	• N/A
			• States concern about the increase of population and states the SOI Expansion Area has been left open as a buffer and opposes development near the dam.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36) • Section 3.10, Hydrology and Water Quality (pp. 3.10-51 to 3.10-54) • Section 3.13, Population and Housing (pp. 3.13-8 to 3.13-13)
			• States concern related to water supply and groundwater recharge.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43) • Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
N/A	Jose Rivera	March 30, 2025	• Expresses disappointment that orchards were cut down for development.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-11 to 3.1-14)
			• States disapproval of setting up the SOI Expansion Area next to Shepherd Avenue due to traffic concerns.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
N/A		April 2, 2025	• States concern related to traffic safety and congestion.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
	Narine and Ali Rashidian		• States concern related to groundwater supply impacting private wells.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• States concern related to noise.	• Section 3.12, Noise (pp. 3.12-21 to 3.12-37)
			• States concern related to loss of views.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-11 to 3.1-15)
			• States concern related to loss of property value, safety, and degradation of quality of life.	• N/A
			• States concern related to loss of habitat/nature.	• Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-118)
N/A	Hemant and Meenakshi Dhingra	April 2, 2025	• Requests EIR be redone.	• N/A
			• States concern related to traffic safety.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• Requests that water impacts be outlined in detail and transparent.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-30 to 3.10-60)
			• States concern related to loss of views.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-11 to 3.1-15)
N/A	Craig Howard	April 2, 2025	• States concern related to traffic.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• States concern related to groundwater supply impacting private wells.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• States concern related to noise.	• Section 3.12, Noise (pp. 3.12-21 to 3.12-37)
			• States concern related to loss of views.	• Section 3.1, Aesthetics, Light and Glare (pp. 3.1-11 to 3.1-15)
			• States concern related to loss of property value, safety, and degradation of quality of life.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
			• States concern related to loss of habitat/nature, especially for the California tiger salamander.	• Section 3.4, Biological Resources (pp. 3.4-49 to 3.4-53; 3.4-76 to 3.4-79)
			• States concern related to the hazards of placing development adjacent to the Big Dry Creek Dam.	• Section 3.9, Hazards and Hazardous Materials (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36)
N/A	Chase Schapansky	April 2, 2025	• States concern related to traffic congestion and safety, including funding for street improvements.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• States concern related to groundwater supply for private wells in the project vicinity.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43) • Section 3.17, Utilities and Service Systems (pp. 3.17-27 to 3.17-30)
			• States concern related to loss of habitat/nature impacting views and home values.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-11 to 3.1-15) • Section 3.4, Biological Resources (pp. 3.4-45 to 3.4-118)
N/A	Jennifer Omeara	April 2, 2025	• States concern related to traffic congestion and safety.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• States concern about road infrastructure.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• States concern about groundwater availability for private wells.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
			• States concern about noise and light pollution.	• Section 3.1, Aesthetics, Light, and Glare (pp. 3.1-22 to 3.1-29) • Section 3.12, Noise (pp. 3.12-21 to 3.12-37)
			• States concern related to additional crime in the project vicinity.	• N/A

Agency/Organization	Author	Date	Comment Summary	Revised Draft EIR Coverage of Issue Raised
N/A	Michelle Borges	April 2, 2025	• States concern related to traffic safety and congestion.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
			• States concern about groundwater availability.	• Section 3.10, Hydrology and Water Quality (pp. 3.10-36 to 3.10-43)
N/A	Joni Jones	April 2, 2025	• States concern related to traffic safety and congestion.	• Section 3.16, Transportation (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)

Source: Compiled by FCS. 2025.

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The Public Scoping Meeting held on March 18, 2025, at the City of Clovis Council Chambers, identified the potential areas of concern based on verbal and written comments from the attendees:

- Impacts to the existing canal
- Roadway improvements
- Shepherd and Fowler Avenues traffic congestion
- Recent fatalities at Perrin Avenue and Fowler Avenue
- Suggestion to include improvements to the Perrin Avenue/Fowler Avenue intersection in the first phases of the proposed project
- Suggestion to change the 0.5-mile grid layout for roadways
- Traffic congestion on Behymer Avenue
- Restrictions on new wells
- Reducing water absorption and lowering the water table
- Groundwater supply to existing wells
- Stormwater drainage
- Impacts to tiger salamander
- Potential impacts to wetlands
- Request to ensure there are working fire hydrants throughout development

1.2.1 - Environmental Issues Determined not to be Significant

The NOP identified a topical area that was determined not to be significant. An explanation of why this area is determined not to be significant is provided in Chapter 4, Effects Found not to be Significant. This topical area is as follows:

- Mineral Resources

1.2.2 - Potentially Significant Environmental Issues

The NOP found that the following topical areas may contain potentially significant environmental issues that will require further analysis in the EIR. These sections are as follows:

- Aesthetics, Light and Glare
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazard and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Wildfire

1.3 - Organization of the Revised Draft EIR

This Revised Draft EIR is organized into the following main sections:

- **Chapter ES: Executive Summary.** This chapter includes a summary of the proposed project and alternatives to be addressed in the Revised Draft EIR. A brief description of the areas of controversy and issues to be resolved, and overview of the Mitigation Monitoring and Reporting Program (MMRP), in addition to a table that summarizes the impacts, mitigation measures, and level of significance after mitigation, are also included in this section.
- **Chapter 1: Introduction.** This chapter provides an introduction and overview describing the purpose of this Revised Draft EIR, its scope and components, and its review and certification process.
- **Chapter 2: Project Description.** This chapter includes a detailed description of the proposed project, including its location, site, and project characteristics. A discussion of the project objectives, intended uses of the Revised Draft EIR, responsible agencies, and approvals that are needed for the proposed project are also provided.
- **Chapter 3: Environmental Impact Analysis.** This chapter analyzes the environmental impacts of the proposed project. Impacts are organized into major topic areas. Each topic area includes a description of the environmental setting, methodology, significance criteria, impacts, mitigation measures, and significance after mitigation. The specific environmental topics that are addressed within Chapter 3 are as follows:
  - **Section 3.1—Aesthetics, Light, and Glare:** Addresses the potential visual impacts of development intensification and the overall increase in illumination produced by the proposed project.
  - **Section 3.2—Agriculture and Forestry Resources:** Addresses the potential for conversion of Important Farmland to nonagricultural use and forest land to non-forest use.
  - **Section 3.3—Air Quality:** Addresses potential air quality impacts associated with project implementation and emissions of criteria pollutants. In addition, the section also evaluates project emissions of toxic air contaminants.
  - **Section 3.4—Biological Resources:** Addresses potential impacts on habitat, vegetation, and wildlife; the potential degradation or elimination of important habitat; and impacts on listed, proposed, and candidate threatened and endangered species.

- **Section 3.5—Cultural Resources and Tribal Cultural Resources:** Addresses potential impacts on historical resources, archaeological resources, and burial sites, and additionally addresses potential project impacts related to Tribal Cultural Resources.
- **Section 3.6—Energy:** Addresses potential project impacts related to energy usage.
- **Section 3.7—Geology, Soils, and Seismicity:** Addresses the potential impacts the proposed project may have on soils and assesses the effects of project development in relation to geologic and seismic conditions.
- **Section 3.8—Greenhouse Gas Emissions:** Addresses potential project emissions of GHGs.
- **Section 3.9—Hazards and Hazardous Materials:** Addresses potential for presence of hazardous materials or conditions on the SOI Expansion Area and in the project area that may have the potential to impact human health.
- **Section 3.10—Hydrology and Water Quality:** Addresses the potential impacts of the proposed project on local hydrological conditions, including drainage areas, and changes in the flow rates.
- **Section 3.11—Land Use and Planning:** Addresses the potential land use impacts associated with division of an established community and consistency with the City of Clovis General Plan and City of Clovis Municipal Code (CMC).
- **Section 3.12—Noise:** Addresses potential noise and groundborne vibration impacts during construction and at project buildout from mobile and stationary sources. The section also addresses the impact of noise and groundborne vibration generation on neighboring uses, and whether the proposed project would expose persons to excessive noise levels from airport activity.
- **Section 3.13—Population and Housing:** Addresses the potential of the proposed project to induce direct or indirect population growth.
- **Section 3.14—Public Services:** Addresses potential impacts upon public services, including fire protection, law enforcement, schools, parks, and recreational facilities.
- **Section 3.15—Recreation:** Addresses potential impacts related to parks and park usage.
- **Section 3.16—Transportation:** Addresses potential impacts related to the local and regional roadway system and public transportation, bicycle, and pedestrian access.
- **Section 3.17—Utilities and Services Systems:** Addresses potential impacts related to service providers, including fire protection, law enforcement, water supply, wastewater, solid waste, and energy providers.
- **Section 3-18—Wildfire:** Addresses potential impacts related to wildfire including lands within State Responsibility Areas and lands classified as very high fire hazard severity zones.

- **Chapter 4: Effects Found not to be Significant.** This chapter contains analysis of the topical sections not addressed in Chapter 3.
- **Chapter 5: Other CEQA Considerations.** This chapter provides a summary of significant environmental impacts, including unavoidable and growth-inducing impacts. This chapter discusses the cumulative impacts associated with the proposed project, including the impacts of past, present, and probable future projects. In addition, the proposed project's energy demand is discussed.
- **Chapter 6: Alternatives to the Proposed Project.** This chapter compares the impacts of the proposed project with three land use project alternatives: the No Project Alternative, the Reduced Density Alternative, and the Increased Mixed-use Alternative. An environmentally superior alternative

is identified. In addition, alternatives initially considered but rejected from further consideration are discussed.

- **Chapter 7: Persons and Organizations Consulted/List of Preparers.** This chapter also contains a full list of persons and organizations that were consulted during the preparation of this Revised Draft EIR. This chapter also contains a full list of the authors who assisted in the preparation of the Revised Draft EIR, by name and affiliation.
- **Appendices.** The Revised Draft EIR appendices includes all notices and other procedural documents pertinent to the Revised Draft EIR, as well as all technical material prepared to support the analysis.

1.4 - Documents Incorporated by Reference

As permitted by CEQA Guidelines Section 15150, this Revised Draft EIR has incorporated the following documents by reference:

- City of Clovis General Plan
- City of Clovis General Plan and Development Code Update Final Program Environmental Impact Report (State Clearinghouse No. 2012061069)

In accordance with CEQA Guidelines Section 15150(b), these documents are available for review at the City of Clovis Planning Division at the address shown in Section 1.6 below.

1.5 - Documents Prepared for the Proposed Project

The following technical studies and analyses were prepared for the proposed project:

- Biological Assessment for Endangered Species Act Section 7 Consultation prepared by Vollmar and revised in October 2025 (Appendix E)
- Biological Resources Assessment (BRA) prepared by ECORP dated January 23, 2023 (Appendix E)
- Delineation of Potential Jurisdictional Aquatic Resources (Delineation) prepared by Vollmar (dated August 17, 2023), which was verified by the United States Army Corps of Engineers (USACE) in November 2023 (Appendix E)
- 2023 90-Day Report: California Tiger Salamander and Listed Large Branchiopods (90-Day Report) prepared by Vollmar in August 2023 (Appendix E)
- Rare Plant Survey Report prepared by Vollmar in October 2023 (Appendix E)
- Madera Terrace Conservation Bank: Draft Prospectus prepared by Vollmar, dated November 30, 2021 (Appendix E)
- Compensatory Mitigation Plan and Mitigation Climate Change Analysis prepared by Redtail Consulting in October 2025 (Appendix E)

- Supplementary Information for Endangered Species Act Consultation, Western Spadefoot, and Northwestern Pond Turtle Memorandum (Supplementary Memo) prepared by Vollmar, dated July 11, 2024 (Appendix E)
- Conceptual Mitigation Plan prepared by Redtail Consulting in October 2023 (Appendix E)
- Dry Soil Analysis for the Detection of Federally-listed Large Branchiopods Report (Dry Soil Analysis Report) prepared by HBC in December 2023 (Appendix E)
- Mitigation Overview prepared by Redtail Consulting in December 2023 (Appendix E)
- Application for Incidental Take Authorization prepared by Redtail Consulting and submitted in March 2025 (Appendix E)
- Cultural Resources Inventory Report Triangle Property Project prepared by ECORP Consulting, Inc. in January 2023 (Appendix F)
- Geotechnical Engineering Investigation Proposed Residential Development Behymer and Armstrong Avenues Clovis, California prepared on March 10, 2021, by Krazan & Associates, Inc. (Appendix G)
- Geotechnical Feasibility Evaluation Triangle Development Shepherd Avenue and Locan Avenue Clovis, California prepared on January 4, 2024, by Krazan & Associates, Inc. (Appendix G)
- Geotechnical Feasibility Evaluation Triangle Development Shepherd Avenue and Locan Avenue Clovis, California prepared on January 31, 2024, by Krazan & Associates, Inc. (Appendix G)
- Phase I Environmental Site Assessment Triangle Property East Shepherd and North Temperance Avenues prepared on February 3, 2023, by Krazan & Associates, Inc. (Appendix H)
- Phase I Environmental Site Assessment Shepherd North Properties prepared on February 24, 2021, by Krazan & Associates, Inc. (Appendix H)
- Phase II Limited Subsurface Survey and Soil Pile Sampling Shepherd North Properties prepared on August 30, 2021, by Krazan & Associates, Inc. (Appendix H)
- Water Supply Assessment Vista Ranch Master Plan prepared in March 2024 and revised in September 2025 by Provost & Pritchard Consulting Group (Appendix I and L)
- Vista Ranch Development – Evaluation of Impacts to Groundwater Levels prepared by Provost & Pritchard Consulting Group dated September 18, 2025 (Appendix I)
- Vista Ranch Transportation Impact Analysis prepared by Kittelson & Associates dated September 4, 2024 (Appendix K)
- Clovis Vista Ranch CEQA Transportation Evaluation Technical Memorandum prepared by Kittelson & Associates dated June 27, 2024 (Appendix K)
- Supplemental Traffic Analyses: Proposed Vista Ranch Project prepared by Peters Engineering Group dated September 12, 2025 (Appendix K)
- Wastewater Hydraulic Modeling Study prepared by AKEL Engineering Group, Inc. in September 2025 (Appendix L)

- Water Infrastructure Investigation for Vista Ranch Master Plan and Non-Development Areas prepared by Provost & Pritchard Consulting Group dated September 26, 2025 (Appendix L)

1.6 - Review of the Revised Draft EIR

Upon completion of the Revised Draft EIR, the City filed a Notice of Completion (NOC) with the State Office of Land Use and Climate Innovation (LCI) to begin the public review period (PRC § 21161). Concurrent with the NOC, this Revised Draft EIR has been distributed to responsible and trustee agencies, other affected agencies, surrounding cities, and interested parties, as well as all parties requesting a copy of the Revised Draft EIR, in accordance with PRC 21092(b)(3). During the public review period, the Revised Draft EIR, including the technical appendices, is available for review at the City of Clovis Planning Division and County of Fresno Library, Clovis Branch. The address for each location is provided below:

City of Clovis Planning Division
1033 Fifth Street
Clovis, CA 93612

County of Fresno Library, Clovis Branch
1155 Fifth Street
Clovis, CA 93612

The Revised Draft EIR is also available for review at the following website: https://cityofclovis.com/planning-and-development/planning/planning-projects/vista-ranch-soi/.

Agencies, organizations, and interested parties have the opportunity to comment on the Revised Draft EIR during the 45-day public review period. Written comments on this Revised Draft EIR should be addressed to:

McKencie Perez, MPA, Deputy City Planner
City of Clovis Planning Division
1033 Fifth Street
Clovis, CA 93612
Phone: 559.324.2310
Email: mckenciep@clovisca.gov

Submittal of electronic comments in Microsoft Word or Adobe PDF format is encouraged. Upon completion of the public review period, written responses to all significant environmental issues raised will be prepared and made available for review by the commenting agencies at least 10 days prior to the public hearing on the proposed project, at which the certification of the Final EIR will be considered. Comments received and the responses to comments will be included as part of the record for consideration by decision-makers for the proposed project.

CHAPTER 2

2 - PROJECT DESCRIPTION

This Revised Draft Environmental Impact Report (Revised Draft EIR) analyzes the potential environmental effects of the Vista Ranch Project (proposed project) in the City of Clovis (City).

2.1 - Project Location and Setting

2.1.1 - Location

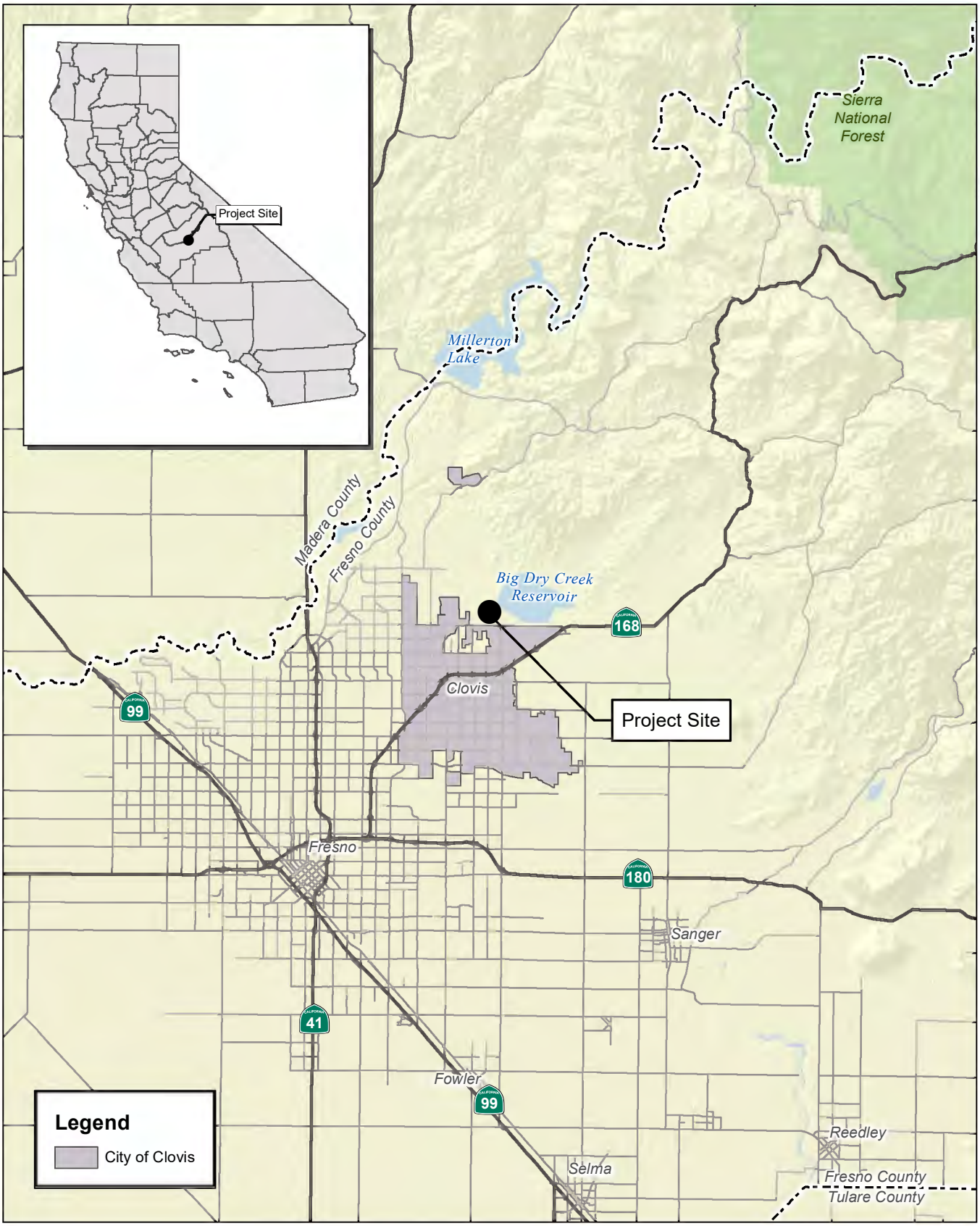
The project site (hereby referred to as the Sphere of Influence [SOI] Expansion Area) is located directly north of the city limits, in unincorporated Fresno County (County) (Exhibit 2-1). The SOI Expansion Area consists of approximately 952 acres located within the City's Planning Area and is bounded on the north by East Behymer Avenue, on the east by the Big Dry Creek Reservoir, on the south by East Shepherd and East Perrin Avenues, and on the west by North Fowler and North Sunnyside Avenues (Exhibit 2-2). The SOI Expansion Area is located within portions of Sections 21, 22, and 23 of Township 12 South, Range 21 East, Mount Diablo Base and Meridian (MDBM).

The SOI Expansion Area is approximately 952 acres and includes 139 Assessor's Parcels. Exhibit 2-3 depicts the parcels within the SOI Expansion Area and the proposed new SOI boundary, with specific Assessor's Parcel Numbers (APNs) identified for the Master Plan Area. In addition, APNs 557-031-30, -32S, -34, -36, -38, -40, -43S, and -45 are located along the north side of Shepherd Avenue and are owned by the City for future roadway right-of-way.

Major roadway networks, including State Route (SR) 168, SR-41, and SR-180, provide regional access to the SOI Expansion Area. SR-168 is an east–west highway that consists of two distinct segments. SR-41 is a north–south highway that connects the central coast with the San Joaquin Valley and the Sierra Nevada. SR-180 is an east–west highway that travels through the San Joaquin Valley through Fresno and east toward the Sierra Nevada to Kings Canyon National Park.

No portion of the SOI Expansion Area is located on a list compiled pursuant to Section 65962.5 of the Government Code (Cortese List). The SOI Expansion Area consists of a combination of fallow and grazing land, several rural residences, offices, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. The proposed Master Plan Area is bisected by the Big Dry Creek Reservoir channel. The Non-development Area (discussed below) contains existing rural residential uses and agricultural fields.

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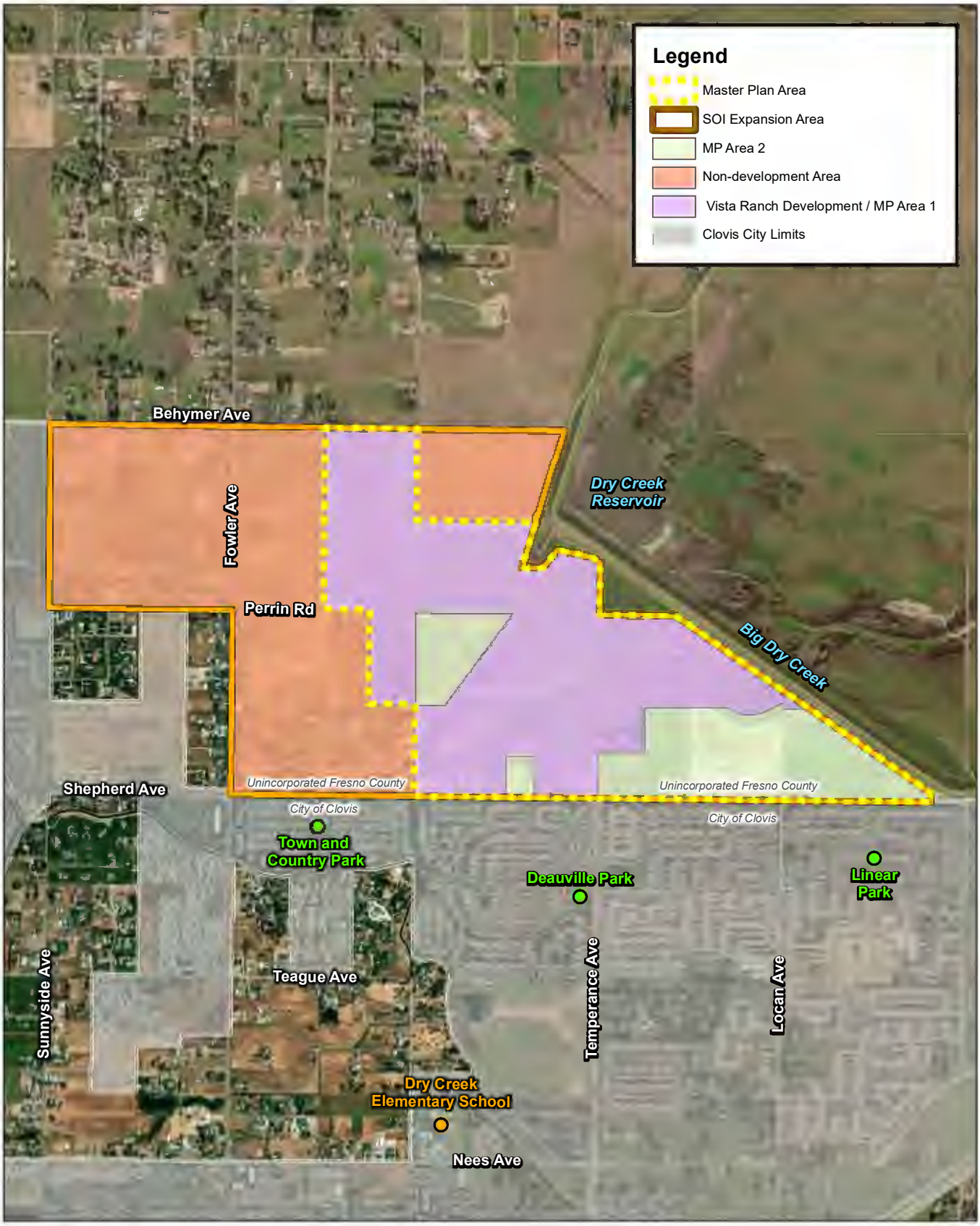


Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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Exhibit 2-1
Regional Location Map

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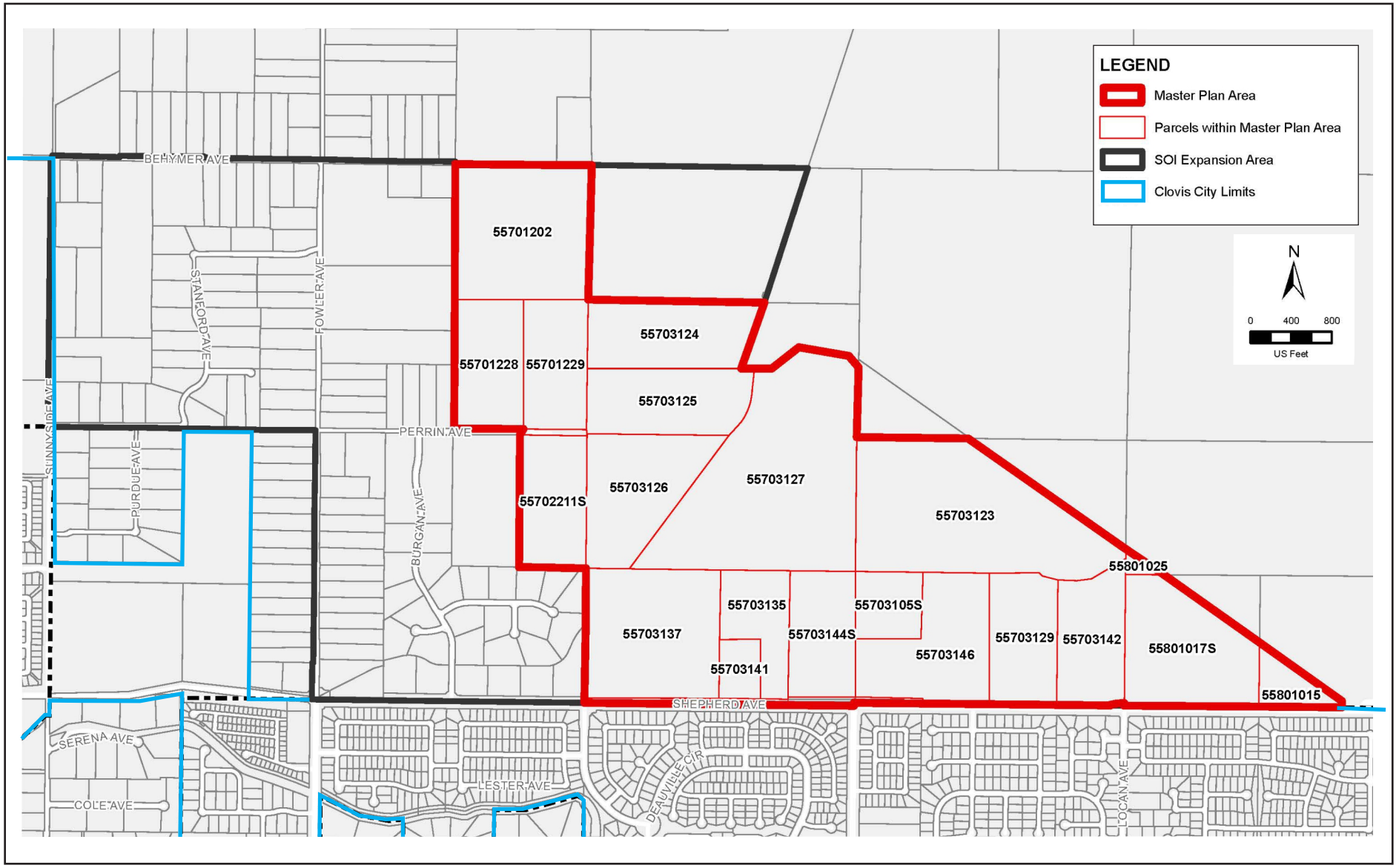


Source: ESRI Aerial Imagery. City of Clovis. Harbour & Associates Civil Engineers, 08/21/2025.

2,000 1,000 0 2,000 Feet

Exhibit 2-2
Local Vicinity Map

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Source: De Novo Planning Group, January 26, 2024. Fresno County GIS.

Exhibit 2-3
Assessor's Parcel Map

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2.1.2 - Surrounding Land Uses

West

The northern portion of the SOI Expansion Area is adjacent to land uses designated by the City as water and very low-density residential. Additionally, the southern portion of the SOI Expansion Area is adjacent to land uses designated by the City as rural residential. The land adjacent to the western boundary of the SOI Expansion Area contains rural residential uses and farmland.

North

The SOI Expansion Area is adjacent to vacant land uses designated by the City as agriculture, rural residential development, and open space.

East

The SOI Expansion Area is adjacent to vacant land uses designated by the City as open space. Additionally, Big Dry Creek and Big Dry Creek Reservoir are adjacent to the SOI Expansion Area.

South

The SOI Expansion Area is bounded by East Shepherd Avenue and is adjacent to land uses designated by the City as very low-, low-, and medium high-density residential development, as well as rural residential development.

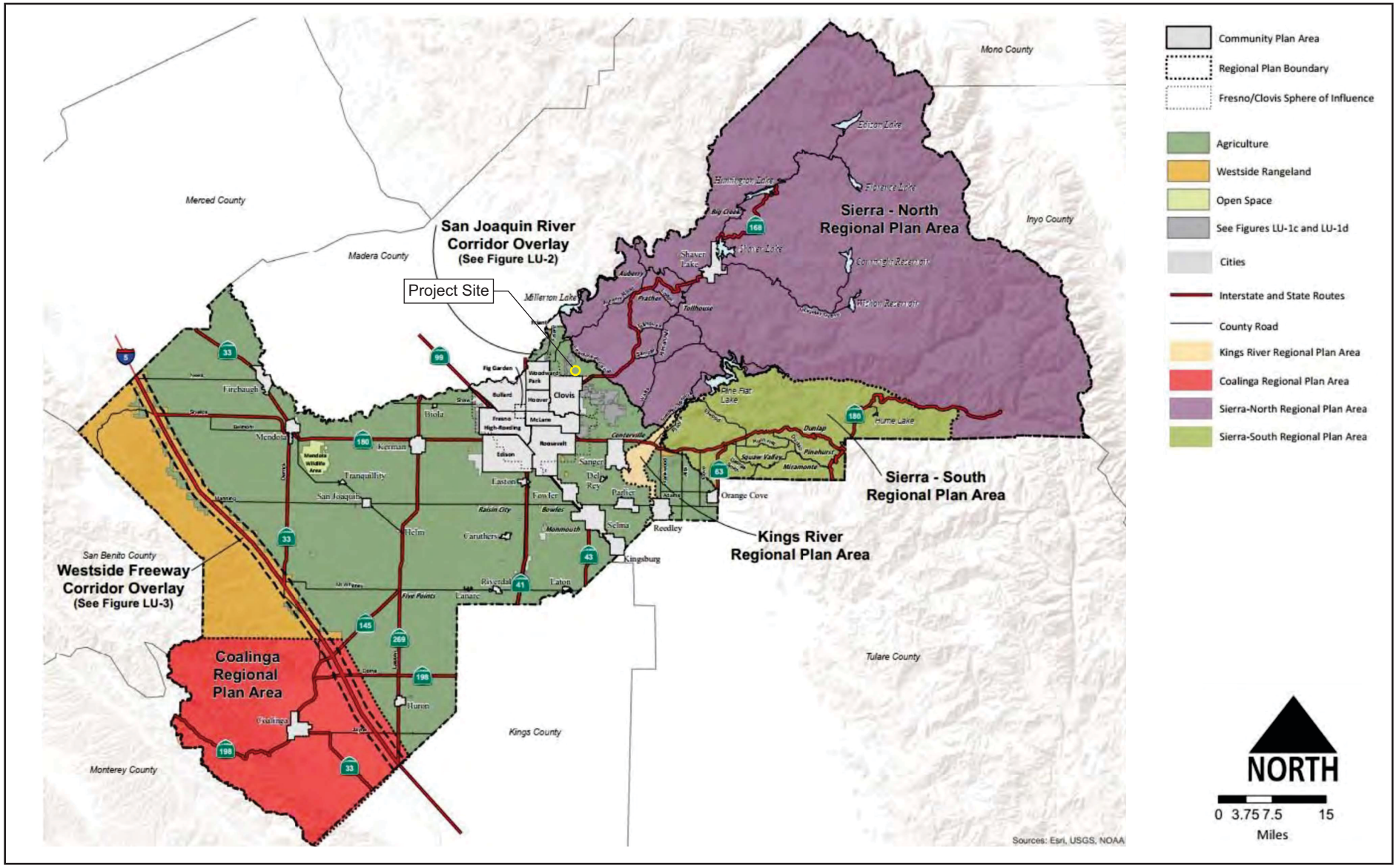
2.1.3 - Existing Land Use Designations and Zoning

Exhibit 2-4 and Exhibit 2-5 show current County General Plan land use designations and zoning for the SOI Expansion Area and surrounding vicinity. The SOI Expansion Area is currently designated as Agriculture and zoned for agricultural use (Exclusive Agricultural [AE20], Limited Agricultural [AL20], and Rural Residential [RR]). Within the AL20 Zone District in the southeast portion of the Master Plan Area, the County has also recently approved a mini-storage facility under Conditional Use Permit (CUP) No. 3526; construction on this facility has been completed, and the facility is currently operating.[1]

The majority of the SOI Expansion Area is within the City's Northeast Urban Center (NEUC), an area that has been designated as a focus of planned growth since the early 1990s. As a result, the current City of Clovis General Plan (General Plan) also provides land use designations for the SOI Expansion Area and vicinity. As shown in Exhibit 2-6, these comprise a variety of uses, including residential development at a range of densities, parks/open space, schools, and mixed-use village.

[1] County of Fresno. 2021. Inter Office Memo: Resolution No. 12914—Initial Study No. 7085 and Classified Conditional Use Permit Application No. 3526. November 18. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/66945-reso-12914-cup-3526.pdf. Accessed February 25, 2025.

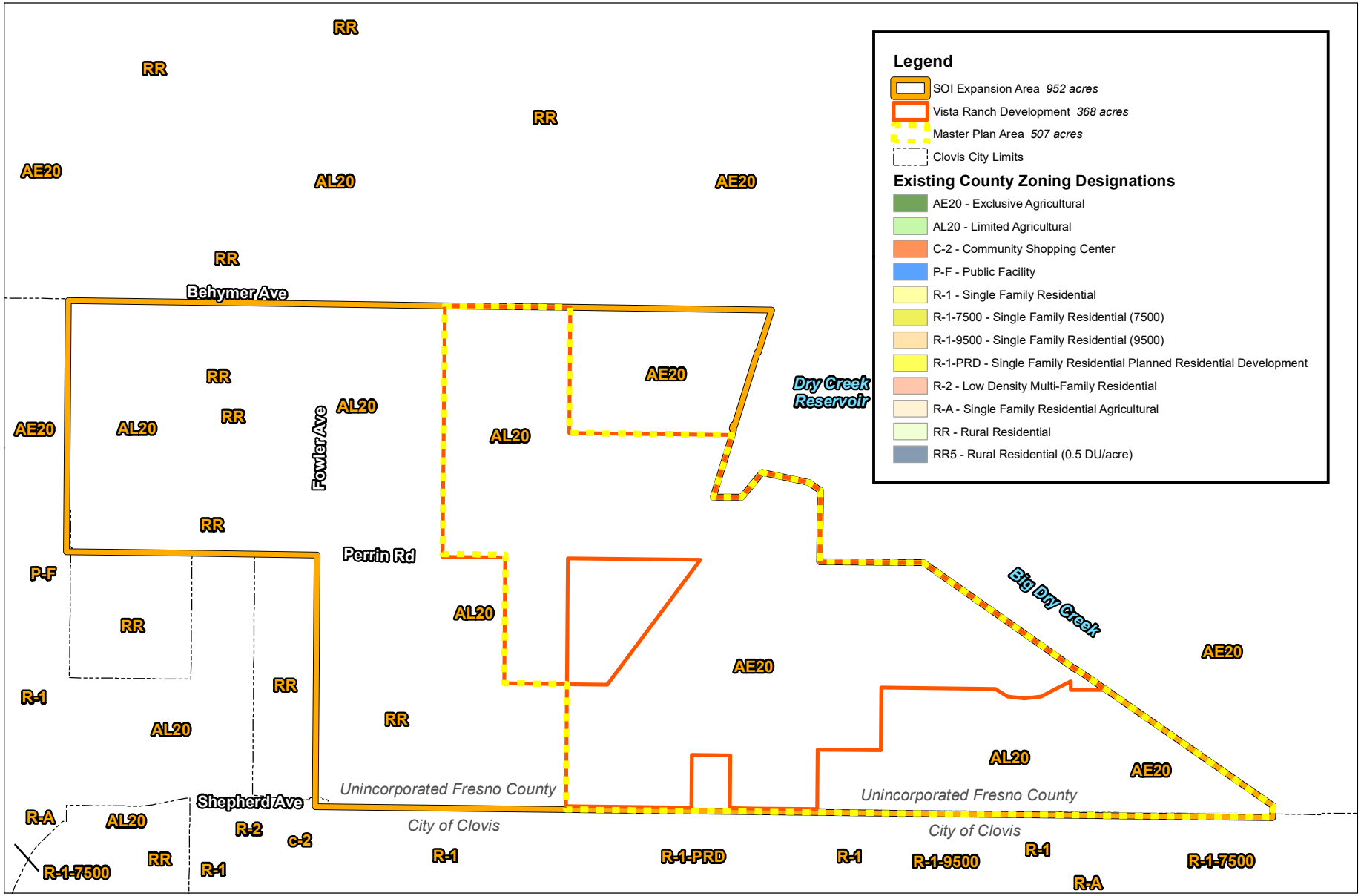
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Source: County of Fresno General Plan Review February 2024.

Exhibit 2-4
Existing County Land Use Designations

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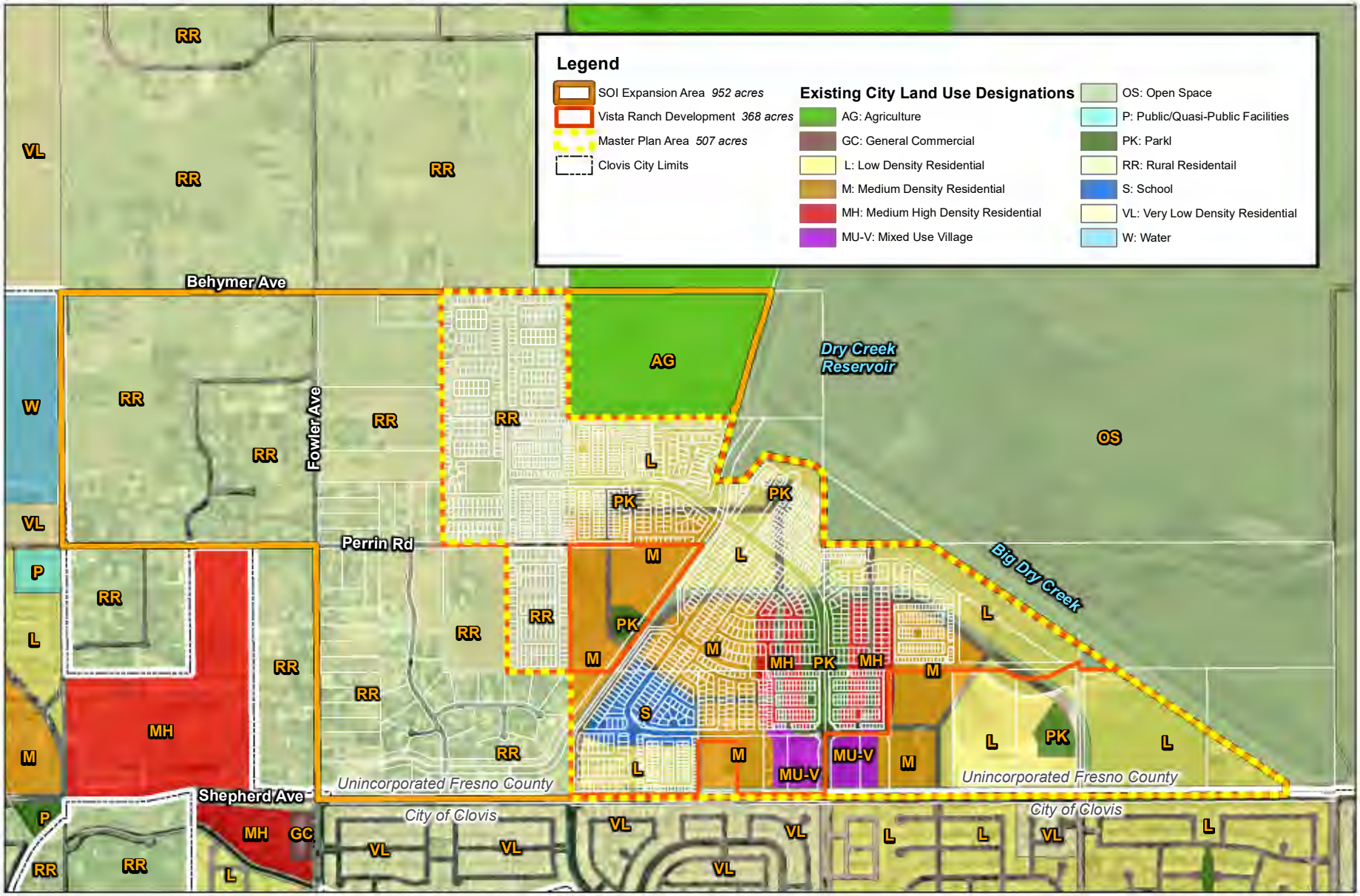


Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025.

1,500 750 0 1,500 Feet

Exhibit 2-5
Existing County Zoning Designations

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Source: ESRI Aerial Imagery. City of Clovis. Harbour & Associates Civil Engineers, 08/21/2025.

1,500 750 0 1,500 Feet

Exhibit 2-6
Existing City Land Use Designations

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2.2 - Project Characteristics

2.2.1 - Proposed Project

The proposed project would expand the City's SOI to include the approximately 952-acre SOI Expansion Area, which is currently outside of the SOI boundary (SOI Expansion). The proposed project would also adopt a comprehensive Vista Ranch Master Plan (Master Plan) to guide development within approximately 507 acres of the SOI Expansion Area, and the proposed project would implement the Vista Ranch Development, which would develop approximately 368 acres within the Master Plan Area with mixed uses over a buildout period of approximately 10 years.

2.2.2 - Project Elements

Table 2-1 summarizes the three project elements.

Table 2-1: Proposed Project Elements

Project Element	Overview
SOI Expansion	• Modification of City's SOI boundary to encompass the approximately 952-acre SOI Expansion Area
Master Plan	• Modification of General Plan Focus Area 13 to bring entirety of Master Plan Area within Focus Area 13 • Designation of Master Plan Area as new Focus Area 13a • Amendments to the General Plan Land Use Element to reflect land use modifications • Amendments to the General Plan Circulation Element to reflect major street routes within Focus Area 13a, multipurpose trails and bike lanes proposed under the Master Plan, and placement of a Shepherd Avenue access point on the north side of Shepherd Avenue • Amendments to the General Plan Open Space and Conservation Element to show Class I multiuse trail routes, open space, and parks proposed under the Master Plan • Adoption of Master Plan Community Overlay District and pre-zoning to establish zoning districts consistent with the Master Plan land use concept • Annexation of Master Plan Area, bringing it within City limits • Addition of two additional transit stops, providing a natural extension of the existing City transit routes on Temperance Avenue
Vista Ranch Development	• Approval of new Vesting Tentative Tract Map for the Vista Ranch Development • Development Agreement with the applicant may be included • Buildout of the Vista Ranch Development

The following sections describe the various elements of the proposed project—the SOI Expansion, Master Plan, and Vista Ranch Development—in more detail. The SOI Expansion is purely administrative; in and of itself it would not directly result in changes to the physical environment, but

because the other proposed project elements could not be implemented without it, it is considered the indirect cause of the individual and collective impacts of both the Master Plan and the Vista Ranch Development, and analyzing the impacts of the Master Plan and Vista Ranch Development also analyzes the physical impacts of the SOI Expansion, as discussed in more detail below.

As Exhibit 2-2 shows, the 952-acre SOI Expansion Area includes:

- The 507-acre Master Plan Area, further subdivided into the 368-acre site planned for the proposed Vista Ranch Development (Master Plan [MP] Area 1) and an additional 139 acres that are expected to be developed under separate future projects but for which no projects are currently proposed (MP Area 2); and
- An additional approximately 445 acres for which no entitlements other than inclusion in the SOI are currently proposed (Non-development Area).

Impact analysis in this Revised Draft EIR is organized by sub-area (Vista Ranch Development/MP Area 1, MP Area 2, and SOI Expansion/Non-development Area), with the level of analysis dictated by the level of detail currently available on changes within each area.

SOI Expansion (Program-level Analysis)

As noted above, the proposed expansion of the City's SOI is strictly a land use change. It would modify the current SOI boundary to encompass the SOI Expansion Area shown on Exhibit 2-2, enabling annexation of the Master Plan Area and construction of the proposed Vista Ranch Development, discussed further below. In and of itself, the SOI Expansion would not result in physical changes to the environment.

Vista Ranch Master Plan (Program-level Analysis)

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the NEUC common public identity. As such, it envisions the following:

- Up to 3,286 residential units;
- Approximately 16 acres of commercial and mixed uses;
- A new elementary school occupying an approximately 19-acre site;
- Approximately 59 acres of parks, trails, and preserved open space; and
- Utilities service, including water, wastewater, storm drainage, and regulated public utilities (electricity, natural gas, telephone, cable, and internet).

The Master Plan Area also includes an existing mini-storage facility on approximately 32 acres at the intersection of East Shepherd Avenue and Locan Avenue, on the south edge of the Master Plan Area. As noted above, the mini-storage facility was proposed by a different applicant and underwent separate California Environmental Quality Act (CEQA) review in 2021, with the County acting as the

Lead Agency. It has been authorized by the County under a CUP, has been constructed, and is currently operating as a mini-storage facility. As such, although it is acknowledged and planned for in the Master Plan, it is not considered a new use under the Master Plan. Rather, as noted above, it is part of the baseline conditions for purposes of analysis in the Revised Draft EIR and is not analyzed further in the Revised Draft EIR.

A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of the 368-acre Vista Ranch Development, described in more detail in the next section. Impacts within the remaining 139 acres of the Master Plan Area (MP Area 2) (exclusive of the mini-storage facility previously analyzed under CEQA, approved by the County, and under construction) are analyzed at a programmatic level; when specific future projects are proposed in MP Area 2, they would be subject to separate, future CEQA analysis at the project level, tiered from this Revised Draft EIR.

Circulation

The Master Plan proposes a hierarchy of roadways to accommodate the capacity needs of the existing street network, as well as providing additional vehicular access to the Master Plan. Shepherd Avenue and Temperance Avenue are the main expressway/arterial/collector roadways providing access to the Master Plan Area. In addition, Foothill Parkway, Cypress Avenue, Perrin Road, and Behymer Avenue would provide additional circulation for the proposed Vista Ranch Development. The neighborhoods within the Master Plan would include a network of public and private residential streets to provide an efficient flow of traffic and pedestrian mobility through the Master Plan Area. Additionally, sidewalks would be included per the City's standards. Three additional transit stops would also be provided as a natural extension of the existing City transit routes on Temperance Avenue.

General Plan Amendment to Circulation Element

Amendments to the General Plan Circulation Element would also be necessary. The General Plan Circulation Element is proposed for the following amendments:

- Addition of major street route designations within the Master Plan to better accommodate the traffic (trip generation) expected as a result of development under the Master Plan, which would be shown on an updated General Plan Circulation Diagram (General Plan Figure C-1);
- Changes to General Plan Figure C-2 (Bicycle and Trails System) to show the multipurpose trails and bike lanes proposed under the Master Plan and their integration with the City's existing trail and bicycle infrastructure system; and
- Placement of a Shepherd Avenue access point on the north side of Shepherd Avenue, between North Armstrong and North Temperance Avenue.

Land Use Modification

The City plans to annex the entirety of the Master Plan Area, bringing it within incorporated city limits.[2] This would entail land use planning modifications at several levels.

General Plan Amendment to Land Use Element

The General Plan identifies 14 focus areas within the City and its SOI which complement a property's General Plan land use designation and may expand permissible uses, introduce new policy requirements, augment development standards, or simply call attention to a complex property. The majority of the NEUC and the eastern portion of the SOI Expansion Area are within General Plan Focus Area 13, Urban Center. Focus Area 13 focuses on potential outward growth, ensuring this growth remains high quality, fiscally sustainable, balanced, and drives toward the General Plan's goals and policies. Focus Area 13 identifies that a master plan is required, and development should give special consideration to buffering of residential adjacent to the focus area and design features for the focus area as a gateway to the City.

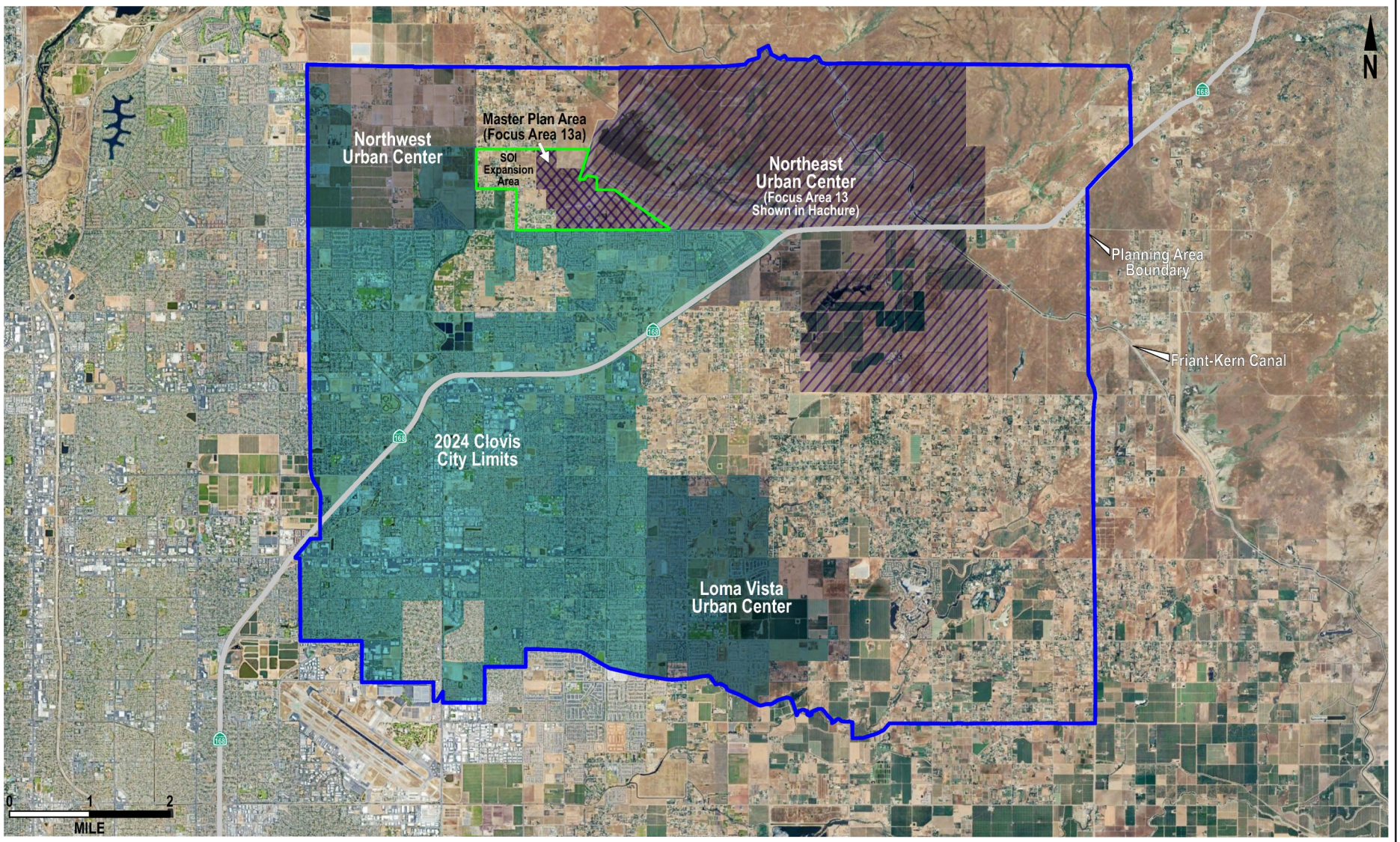
Adoption of the Master Plan would require modifying the boundary of Focus Area 13 to bring the entirety of the Master Plan Area within the Focus Area, as shown in Exhibit 2-7. The Master Plan Area would then be designated Focus Area 13a, a new sub-area of Focus Area 13. This would not eliminate the larger Focus Area 13; rather, it would allow the establishment and refinement of development goals and policies specific to the Master Plan Area, under the Master Plan. The General Plan land use designation for the entire new Focus Area 13a would be changed to Mixed Use Village, superseding the mosaic of multiple land use designations identified in the current General Plan (Exhibit 2-8).

Open Space Modification

The General Plan Open Space and Conservation Element is proposed for the following amendments:

- Modification of the General Plan Parks and Open Space Diagram (General Plan Figure OS-1) to show the Master Plan's Class I multiuse trail routes, open space, and parks and their integration with the City's existing parks, trails, and open spaces; and
- Redistribution of neighborhood park areas assigned under the current General Plan to reflect the Master Plan development concept.

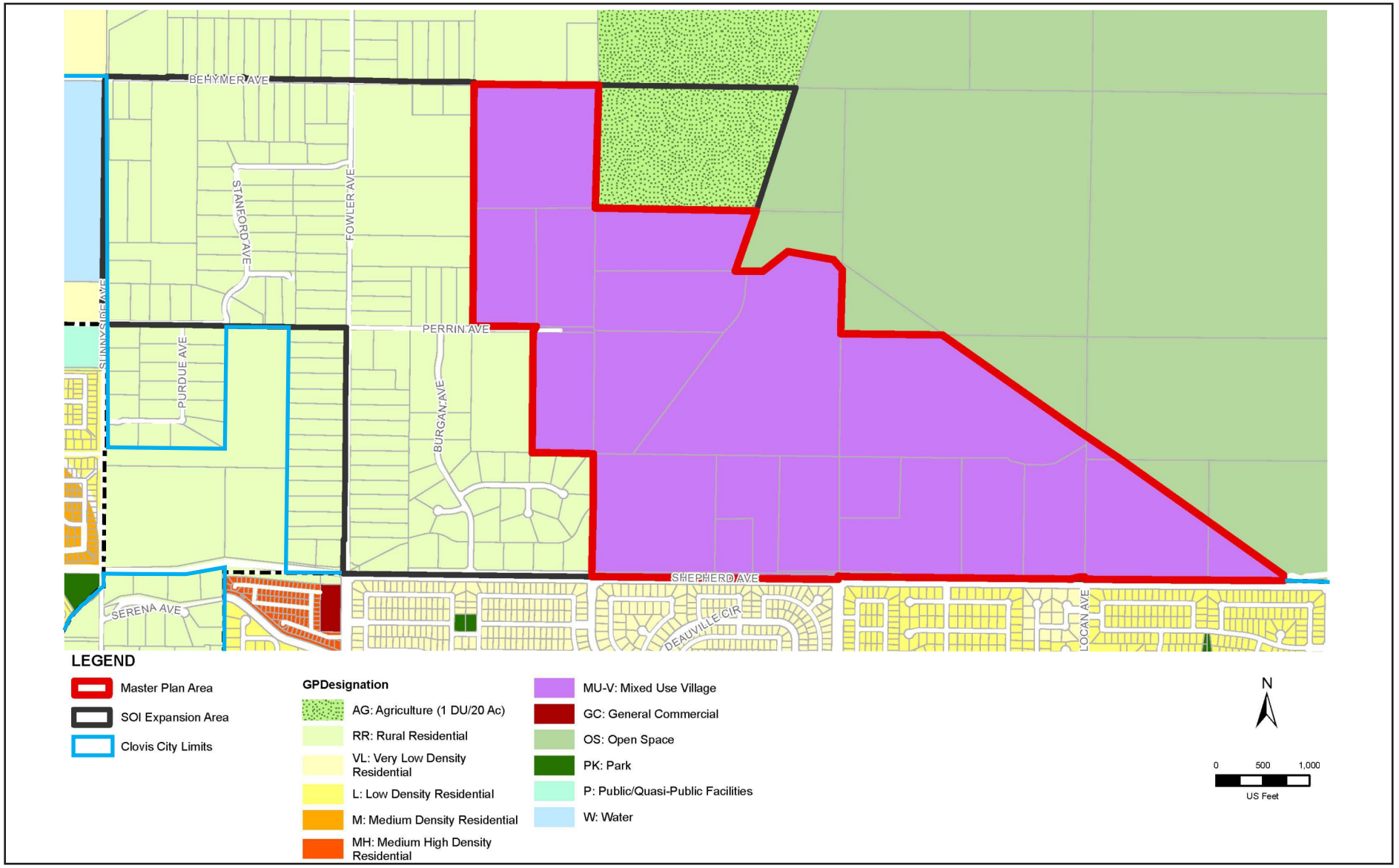
[2] Currently, only the Master Plan Area is proposed for annexation. However, the final annexation boundary may be refined as part of the study process, which will include a public hearing before the Fresno County Local Agency Formation Commission (LAFCo), which has the final statutory authority to set annexation boundaries.



Source: modified from City of Clovis 2014: aerial photograph base from Google Earth (imagery date:11/10/2023, downloaded: 05/18/2024.

Exhibit 2-7
Adjusted Focus Area Boundary

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Source: De Novo Planning Group, January 26, 2024. Fresno County GIS.

Exhibit 2-8
Proposed General Plan Land Use Designations

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Zoning

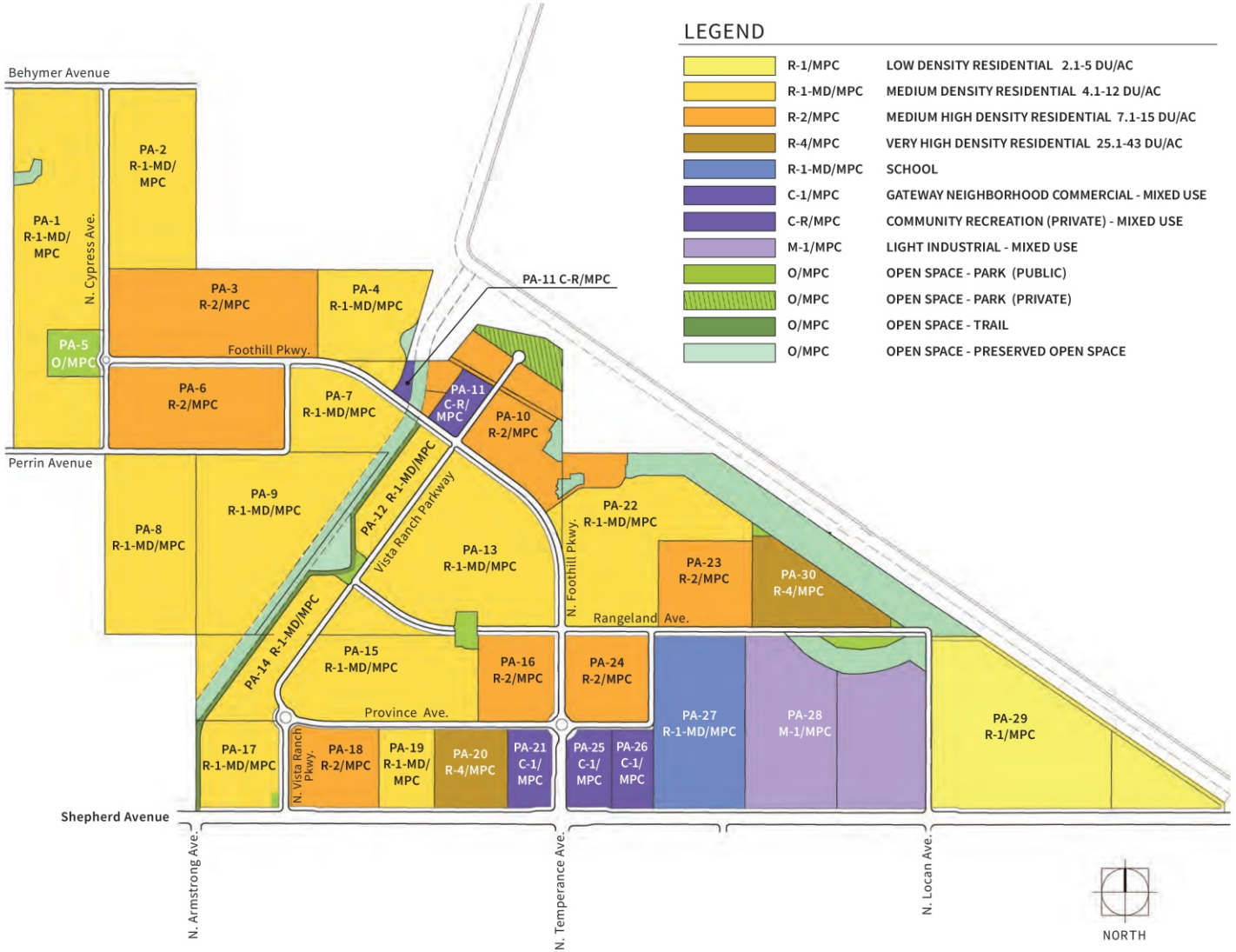
Master Plan Community Overlay District and Pre-Zoning

The Master Plan Area would be placed under a Master Plan Community (MPC) Overlay District and would be subject to "pre-zoning" to establish zoning districts consistent with the Master Plan land use concept. The pre-zoning would transition to adopted City zoning when the City annexes the Master Plan Area, and the Master Plan itself would serve to implement the requirements of the MPC Overlay District.

The following zone districts are proposed within the Master Plan Area, as shown in Exhibit 2-9. Because all of these zone districts would be within an MPC Overlay District, they would include the MPC suffix and would be subject to development standards as modified and adopted in the Master Plan.

- **Low-Density Residential (R-1/MPC):** Areas of conventional single-family uses on comparatively large parcels; allowable density range under the Master Plan is 2.1 to 5.0 dwelling units per acre (du/acre).
- **Medium Density Residential (R-1-MD/MPC):** Areas of single-family uses, including attached and detached single-family structures, with an allowable density range under the Master Plan of 4.1 to 12.0 du/acre. This area includes the development of a school serving residential communities.
- **Medium High Density Residential (R-2/MPC):** Areas of moderately dense residential uses, including multi-family apartments, duplexes, townhouses, and small-parcel attached and detached single-family uses; allowable density range is 7.1 to 15.0 du/acre.
- **Very High Density Residential (R-4/MPC):** Areas of high- and very high-density residential uses, potentially in association with mixed-use development; allowable density range is 25.1 to 43.0 du/acre.
- **Gateway Neighborhood Commercial (C-1/MPC):** Areas of local-serving commercial development compatible with and supportive of adjacent residential neighborhoods.
- **Community Recreation (C-R/MPC):** Areas reserved for recreational uses.
- **Light Industrial (M-1/MPC):** This designation identifies areas appropriate for business parks and industrial uses, including mini-storage.
- **Open Space (O/MPC):** Areas of parklands, open space, trails, and similar uses, as shown on Exhibit 2-9.

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Source: Kroll & Associates. Map date: August 2025.

Exhibit 2-9
Proposed Master Plan Zoning

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Vista Ranch Development (Project-level Analysis)

Impacts within the Vista Ranch Development are analyzed to the project level because the City has received a specific and detailed development proposal for this area, described below.

Development Features

The proposed Vista Ranch Development contemplates the construction of a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities (Exhibit 2-10).

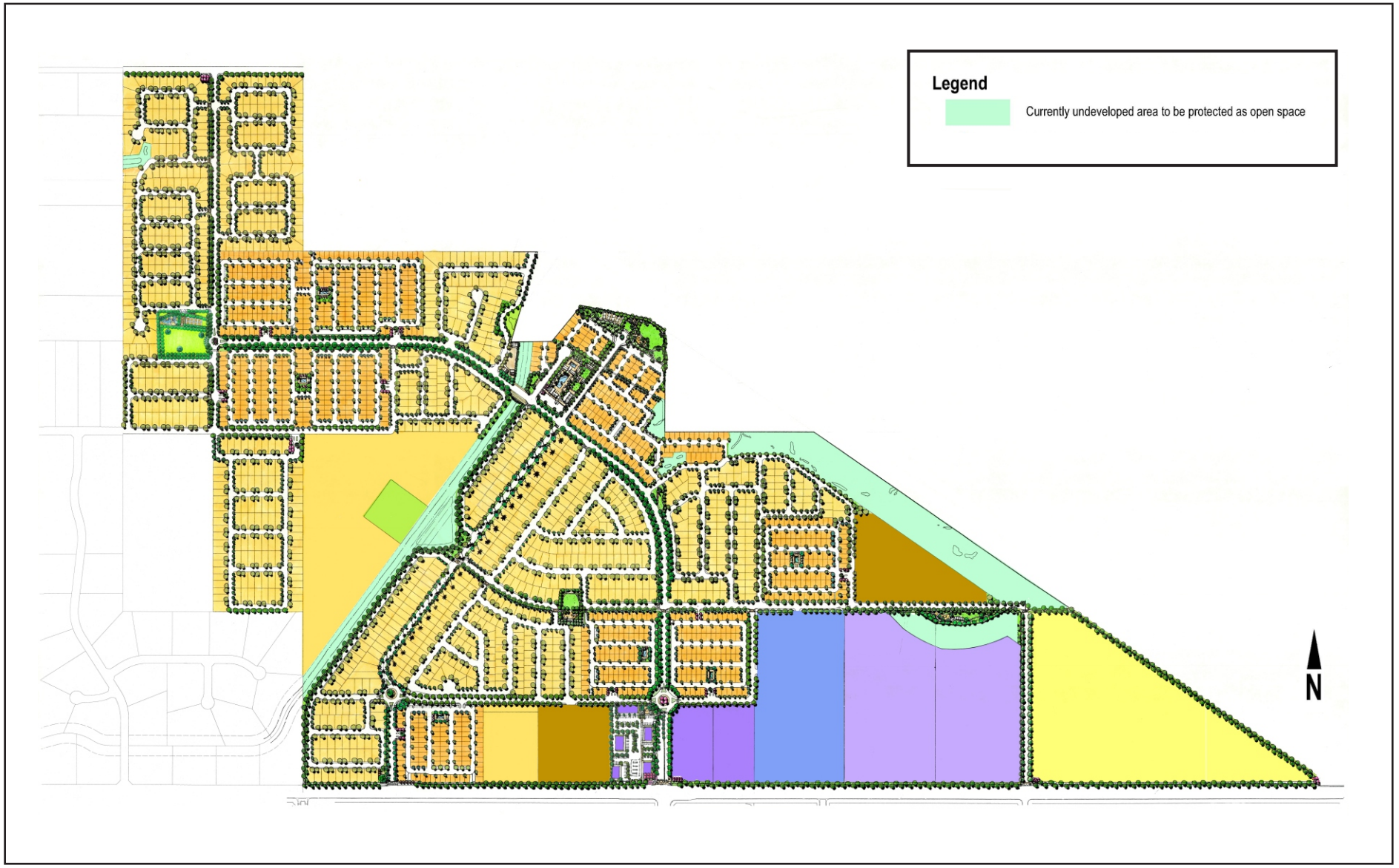
The Vista Ranch Development is planned to center on a mixed-use village core area surrounded by higher-density residential development, with lower residential densities toward the edges of the development, transitioning to surrounding rural/agricultural uses (Exhibit 2-10). Higher housing densities would also cluster along major circulation corridors and local amenities. Residential areas would offer a variety of housing types and lot sizes to accommodate a range of housing objectives and buyer needs, with a goal to ensure housing for a range of families and lifestyles. The village core would provide a Gateway neighborhood commercial center designed to offer local-serving retail and service uses, as well as employment opportunities. A private community recreation center and park would also be provided.

Within the Vista Ranch Development, new public and private roadways would enable access and circulation (Exhibit 2-10). Public roadways would include sidewalks per City standards, with bike lanes along the major roadways. The proposed Vista Ranch Development is also expected to provide for off-site roadway and/or utilities improvements along principal access corridors, potentially including East Behymer Avenue, Fowler Avenue, Perrin Avenue, Locan Avenue, Armstrong Avenue, East Shepherd Avenue, and Temperance Avenue.

Over the longer term, as an amenity to provide an internal connection between the east and west portions of the new development, the applicant intends to construct a new bridge across the Big Dry Creek Reservoir channel downstream of the Reservoir spillway (Exhibit 2-10). The bridge design is being coordinated with the Fresno Metropolitan Flood Control District (FMFCD) as the channel's owner/operator, and the bridge would conform to FMFCD's operational needs and applicable Federal Emergency Management Agency (FEMA) and City requirements for flood protection.

The proposed Vista Ranch Development would also include an extensive trail system to provide neighborhood connectivity, as well as safe and convenient access from residential areas to community amenities and commercial uses. Multiple public parks and trails totaling approximately 20 acres would be dispersed throughout the development (Exhibit 2-10). Private parks would also be provided, including mini-parks and/or community pools in medium high- and very high-density gated neighborhoods.

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Source: Modified from Wilson Premier Homes 2025.

Exhibit 2-10
Vista Ranch Development Plan

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In addition, the proposed project may include enhancing the reach of the remnant Dry Creek channel on the adjacent parcel to the south (where the mini-storage facility is under construction) as a parkland amenity, potentially including native species plantings and a walking trail; this would need to be coordinated with the owner of the mini-storage facility.

2.2.3 - Infrastructure Improvements

Domestic Water

The Master Plan would be served by new connections to the City's potable and nonpotable water distribution system. The proposed water system would be located within proposed public utilities easements and connected to existing City main lines. All water system infrastructure would comply with City Master Plans and standards.

The City provides utility services to the City, including water. The City has three main water supply sources: groundwater, surface water, and recycled water. The City extracts groundwater from the Kings Subbasin. Surface water is delivered to the City by the Fresno Irrigation District (FID). The various current and planned for surface water supplies are from the Kings River and Central Valley Project. The City's Water Reuse Facility produces tertiary-treated effluent that can be used for agriculture or landscape irrigation.

The Master Plan would be served by a new potable water distribution system. Future phases of the proposed project would require new water supply infrastructure that would extend beyond the proposed project boundaries. The precise nature and size of these improvements have not yet been determined; however, it is anticipated that these extended water infrastructure improvements would be within existing rights-of-way or public utility easements along adjacent roadways and connected to existing City main lines. These future improvements would likely extend from the northern project boundary to the west along Behymer Avenue to approximately 770 feet west of Sunnyside Avenue, as well as along Perrin Road, extending west until approximately Burgan Avenue.

Stormwater Drainage

The Master Plan would include construction of a new storm drainage system which would conform to applicable regulations, standards, and specifications of the California State Water Resources Control Board requirements (State Water Board), FMFCD, and the City. This includes, but is not limited to, the municipal National Pollutant Discharge Elimination System (NPDES) stormwater discharge permit, as well as Best Management Practices (BMPs) to control the volume, rate, and potential pollutant load of stormwater runoff. Stormwater throughout the City is collected in FMFCD's basins.

Sanitary Sewer

The Master Plan would be served by new connections to the City's wastewater collection system installed within proposed public utilities easements. The proposed wastewater conveyance facilities would connect to the existing sewer main lines. Wastewater treatment would be provided at the existing Fresno-Clovis Regional Wastewater Treatment Plant (RWTP) in the City of Fresno and by the City's Water Reuse Facility. By agreement with the City of Fresno, the City of Clovis owns a maximum

capacity of 9.3 million gallons per day (mgd). The RWTP is operated by the City of Fresno, while subject to the equitable ownership interests of the City of Clovis and has a maximum capacity of 80 mgd. If required, the City has the capability to acquire additional capacity at the RWTP. Wastewater treatment may also be provided by the City of Clovis Water Reuse Facility. The Clovis Sewer Treatment–Water Reuse Facility (ST-WRF) serves the new growth areas of the City in the southeast, northwest, and northeast urban centers.

The ST-WRF is designed to accommodate future expansion and would ultimately treat 8.4 mgd. The City would manage service to the Master Plan Area to optimize the use of available capacity at each of the plants to facilitate service to the proposed project.

Solid Waste and Recycling Collection

The proposed project would be serviced by the City of Clovis Public Utilities, Community Sanitation division. The services for solid waste, recycling, and organic collection, as well as community cleanup and street sweeping, would be provided in accordance with Title 6.3 of the City of Clovis Municipal Code (CMC).

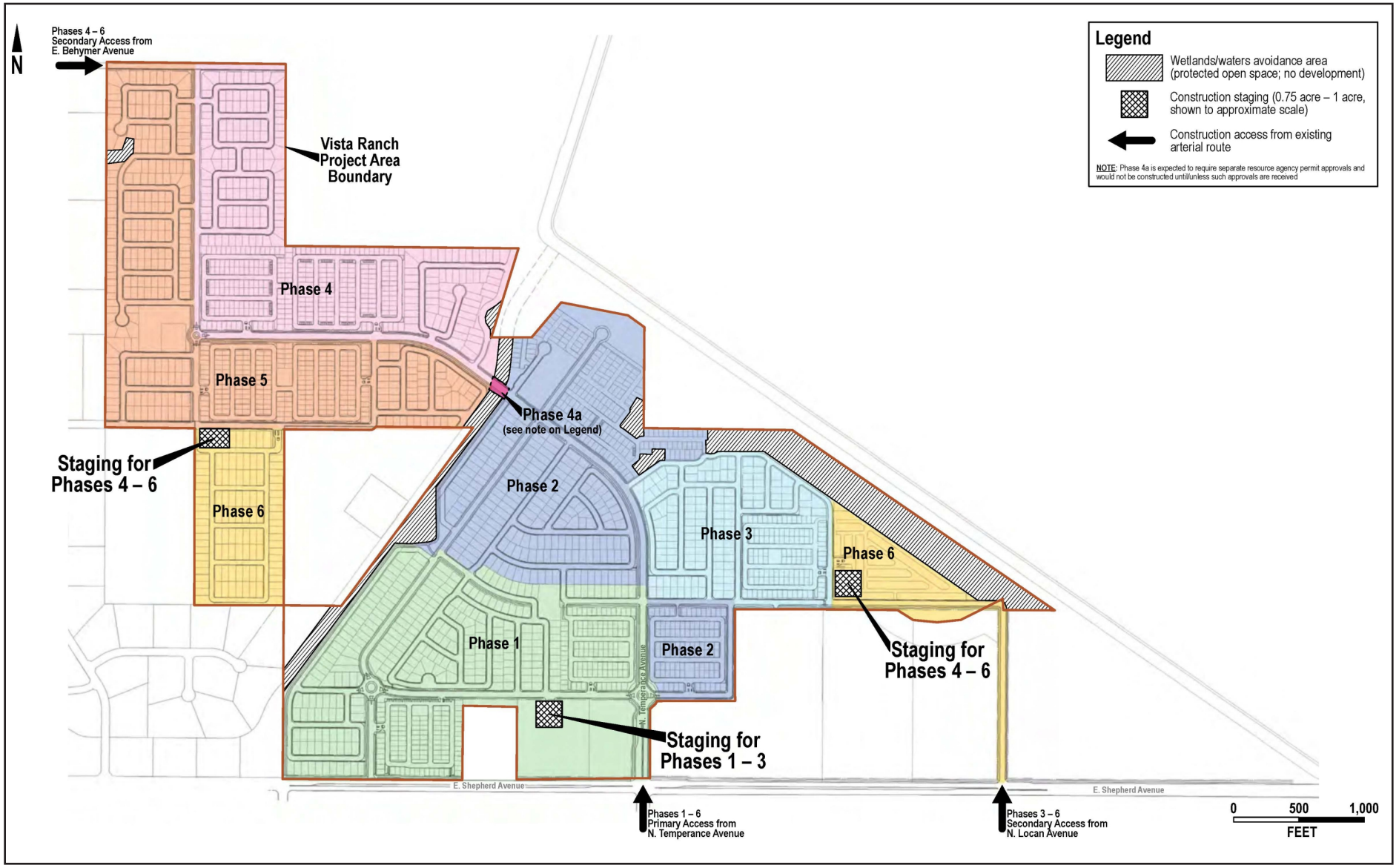
Power and Telecommunications

Electrical service is provided by the Pacific Gas and Electric Company (PG&E). Natural gas is not anticipated for the Vista Ranch Development, although it may be included in MP Area 2. Phone service would be provided by AT&T. Cable service would be provided by Comcast, and related internet services would be extended to all portions of the Master Plan Area from existing facilities located along East Shepherd Avenue and from existing residential development surrounding the Master Plan Area. Proposed utilities would be located within public utility easements to be dedicated along street frontages. Utility improvements would be installed in conjunction with planned street improvements, and all proposed utilities would be underground.

2.2.4 - Phasing and Construction

Phasing

Construction of the proposed Vista Ranch Development is expected to be phased over about 10 years (Exhibit 2-11 and Table 2-2). The south-central portion of the proposed project (Phases 1–3, adjacent to East Shepherd Avenue and North Temperance Avenue) would be constructed first due to proximity to existing development, roadways, and utilities within the City; these phases would be completed in the first 5 years. Construction of Phase 4 is expected to begin in Year 5, and the remainder of the western phases and the eastern portion of Phase 6 would be built out in Years 5–10. The bridge connecting the eastern and western portions of the proposed Vista Ranch Development is conceptualized as a separate Phase 4a, to be constructed along with Phase 4, since bridge construction would not begin until (1) the east–west connection becomes necessary and (2) all necessary permit approvals have been issued. Additionally, there would be no new development within MP Area 2.



Source: Wilson Premier Homes. 2025. Vista Ranch Master Development Plan, Clovis, CA (Draft Submittal). (September.) Prepared for Wilson Premier Homes, Fresno, CA by Broussard & Associates, Clovis, CA and Harbour & Associates, Clovis, CA
Modified from Wilson Premier Homes 2025, 05/12/2026

Exhibit 2-11
Phasing Plan

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Table 2-2: Proposed Vista Ranch Development Details by Phase

Phase	Zoning	Residential Uses	Commercial Uses	Other Uses
1	R-1-MD/MPC R-2/MPC R-4/MPC C-1/MPC O/MPC	• Approximately 448 single-family homes on approximately 57 acres • Demolition and clearing of future R-4 apartment site	• Demolition and rough grading of approximately 4.4 acre commercial site (construction of commercial uses to follow once homes are occupied)	• Approximately 1-acre neighborhood park/trailhead • Trails and trailheads within Phase 1 limits
2	R-1-MD/MPC R-2/MPC C-R/MPC O/MPC	• Approximately 448 single-family homes on approximately 58 acres	—	• Community Recreation Center on an approximately 2.52-acre site; includes office, event space and event gathering areas, pool, and shade structures • Approximately 2.7-acre private park • Pocket parks • Trails and trailheads within Phase 2 limits
3	R-1-MD/MPC R-2/MPC	• Approximately 244 single-family homes on ~31 acres	• Approximately 4.4-acre commercial site (up to 85,000 square feet) • Exact timing of commercial development would be market-driven	• Pocket parks and green space
4	R-1-MD/MPC R-2/MPC C-R/MPC O/MPC	• Approximately 453 single-family homes on approximately 51 acres • Approximately 233 units in an approximately 7-acre multi-family development adjacent to East Shepherd Avenue	—	• Approximately 0.53-acre storage and maintenance yard for homeowners association (HOA) • Pocket parks, trails, and green space • Bridge across Outlet Channel (Phase 4a)
5	R-1-MD/MPC R-2/MPC O/MPC	• Approximately 470 single-family homes on approximately 60 acres	—	• Approximately 3.32-acre public area park

Phase	Zoning	Residential Uses	Commercial Uses	Other Uses
6	R-1-MD/MPC R-4/MPC O/MPC	• Approximately 108 single-family homes on approximately 58 acres • Approximately 291 multi-family units on approximately 8.8 acres • Approximately 23 single-family homes	—	• Approximately 1.0-acre area park • Trails

The first step within each phase would be to construct the backbone facilities: major street access to all lots within the phase, looped water mains, wastewater infrastructure, and stormwater drainage infrastructure. Residential lots would then be developed in subphases, with the intent of developing approximately 200 lots per subphase, at a rate of approximately 22 units per month, subject to market demand. This portion of the process is expected to take approximately 8 to 12 months per subphase, dependent on market demand.

Construction

Construction Means and Methods

Construction of the proposed project would rely on standard land development and construction techniques as practiced in the San Joaquin Valley/Fresno County region. Initial ground disturbance would require equipment such as survey gear, mowers, discers, bulldozers, self-loading scrapers, excavators, loaders, skidsteers, tractors, backhoes, trenchers, dump trucks, water trucks, semi-trucks, pickup trucks, and other heavy equipment. Site development may also include the use of equipment such as motor graders, rollers, compactors, road paving machines, and similar equipment. Construction within developed lots would also be conducted with standard equipment and techniques such as trucks, cranes, forklifts, concrete pumps, and other standard means and methods as determined by the builders.

Construction Access and Staging

Exhibit 2-11 shows planned construction access and staging. Construction traffic to MP Area 1 would follow existing roadways, and the primary entry to MP Area 1 would be via North Temperance Avenue as the principal arterial accessing MP Area 1.

All staging for development construction would be restricted to the Master Plan Area, although additional minor staging for roadway improvements outside the Master Plan Area, as shown on Exhibit 2-11, may be located within existing City roadway rights-of-way. On-site staging areas would be approximately 0.75 acre to 1 acre in extent, sufficient to accommodate all needed construction vehicles, equipment, materials laydown/storage, and job office trailers.

The staging area for the construction of Phases 1 through 3 would be located in an area planned for R-4, Very High Density Residential (apartment) development; this maximizes efficiency because

construction of the apartments would be the last step in the buildout of Phases 1 through 3. Once the apartments are constructed—anticipated in late Phase 3 or early Phase 4—staging would be relocated to the Phase 4 through 6 staging area, which is also planned for R-4 development and thus would be the last portion of the Phase 6 area to be developed.

2.3 - Project Objectives

The underlying purpose of the proposed project is to expand the City's SOI to include the SOI Expansion Area, annexation, master planning, and subsequent development of land to accommodate growth. The project objectives include:

- Expand the City's SOI in an area contemplated by the City General Plan to establish a logical and orderly boundary that promotes the efficient extension of municipal services to areas planned for growth.
- Undertake master planning as a long-range planning tool to guide development within areas designated for growth under the City of Clovis General Plan.
- Provide residential housing opportunities that are visually attractive and accommodate the future housing demand in the City.
- Refine the mixture of housing types, sizes, and densities that collectively provide for local and regional housing demand.
- Provide infrastructure that meets City and FMFCD standards and is integrated with existing and planned facilities and connections.
- Establish a logical phasing plan designed to ensure that each phase of development would include necessary public improvements required to meet City standards.
- Develop a strong pedestrian network that links activities, recreational amenities, local commercial uses, and neighborhoods together.
- Establish neighborhood designs that consider safety and security of citizens.
- Consider affordability and housing diversity by developing residential uses that are proximate to urban services and roadways and varied in size and density.
- Embrace the natural resources and views of the Sierra Nevada Mountain range.

2.4 - Intended Uses of this Revised Draft EIR

This Revised Draft EIR is being prepared by the City of Clovis to assess the potential environmental impacts that may arise in connection with actions related to implementation of the proposed project. Pursuant to CEQA Guidelines Section 15367, the City of Clovis is the Lead Agency for the proposed project and has discretionary authority over the proposed project and project approvals. The Revised Draft EIR is intended to address all public infrastructure improvements and all future development that are within the parameters of the proposed project. Accordingly, if certified, later activities

necessary to implement the proposed project will be reviewed in light of this EIR and no additional environmental review would be necessary unless required by CEQA.

2.4.1 - Discretionary and Ministerial Actions

Discretionary approvals and permits are required by the City of Clovis for implementation of the proposed project. The proposed project would require the following discretionary approvals and actions, including:

- Certification of the EIR;
- Adoption of the Mitigation Monitoring and Reporting Program (MMRP);
- Approval of City of Clovis General Plan Amendments (Land Use Element, Circulation Element, and Open Space and Conservation Element);
- Approval of City of Clovis Pre-zoning;
- Approval of Master Plan Community Overlay District and Master Development Plan;
- Approval of Vesting Tentative Maps;
- Possible approval of Development Agreement;
- Approval of SOI Expansion;
- Authorization to submit SOI Amendment request to Fresno LAFCo;
- Approval of Annexation of the Master Plan, including Inhabited Areas;
- Authorization to submit Annexation request for the Master Plan to Fresno LAFCo;
- Approval of future Final Maps;
- Approval of future Grading Plans and issuance of Grading Permits;
- City review and approval of construction and utility plans;
- Approval and issuance of future Building Permits;
- Issuance of permits and other approvals necessary for implementation of the proposed project;
- Issuance of permits and other approvals necessary for public and private development projects consistent with the proposed project; and
- Allocation and provision of City of Clovis Sewer and Water service.
- FMFCD review, approval of construction of storm drainage facilities, and provision for FMFCD drainage service.

Additionally, subsequent ministerial actions may be required for the implementation of the proposed project.

2.4.2 - Responsible and Trustee Agencies

A number of other agencies in addition to the City of Clovis will serve as Responsible and Trustee Agencies, pursuant to CEQA Guidelines Section 15381 and Section 15386, respectively. This Revised Draft EIR will provide environmental information to these agencies and other public agencies which may be required to grant approvals or coordinate with other agencies as part of project implementation. These agencies may include, but are not limited to, the following:

- Fresno LAFCo
- Central Valley Regional Water Quality Control Board (Central Valley RWQCB)
- San Joaquin Valley Air Pollution Control District (SJVAPCD)
- FMFCD
- Fresno County Department of Public Health
- California Department of Fish and Wildlife (CDFW)

Actions that are necessary to implement the proposed project that must be taken by other agencies are:

- Fresno LAFCo–SOI Amendment, Annexation, and Detachment from the Fresno County Fire Protection District and the County Service Area No. 51 (Dry Creek);
- Central Valley RWQCB–Storm Water Pollution Prevention Plan (SWPPP) approval prior to construction activities pursuant to the Clean Water Act;
- SJVAPCD–Approval of construction-related air quality permits; and
- FMFCD–review of stormwater facilities, grading, and street improvements.
- Fresno County Department of Public Health–Permits for abandonment of wells and septic systems, underground storage tanks.
- CDFW–Incidental Take Permit

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CHAPTER 3

3 - ENVIRONMENTAL IMPACT ANALYSIS

Organization of Issue Areas

This Revised Draft Environmental Impact Report (Revised Draft EIR) provides analysis of impacts for those environmental topics where it was determined in the Notice of Preparation (NOP) or through subsequent analysis that the proposed project would result in "potentially significant impacts." Sections 3.1 through 3.18 discuss the environmental impacts that may result with approval and implementation of the proposed project.

Issues Addressed in this Revised Draft EIR

The following environmental issues are addressed in Chapter 3:

- Aesthetics, Light, and Glare
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Energy
- Geology, Soils, and Seismicity
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems
- Wildfire

Level of Significance

Determining the severity of project impacts is fundamental to achieving the objectives of the California Environmental Quality Act (CEQA). CEQA Guidelines Section 15091 requires that decision-makers mitigate, as completely as is feasible, the significant impacts identified in the Revised Draft EIR. If the EIR identifies any significant unmitigated impacts, CEQA Guidelines Section 15093 requires decision-makers in approving a project to adopt a statement of overriding considerations that explains why the benefits of the proposed project outweigh the adverse environmental consequences identified in the EIR.

The level of significance for each impact examined in this Revised Draft EIR was determined by considering the predicted magnitude of the impact against the applicable threshold. Thresholds were developed using criteria from the CEQA Guidelines and checklist; State, federal, and local regulatory schemes; local/regional plans and ordinances; accepted practice; consultation with recognized experts; and other professional opinions.

Impact Analysis and Mitigation Measure Format

The format adopted in this Revised Draft EIR to present the evaluation of impacts is described and illustrated below.

Summary Heading of Impact

Impact AES-1: **An impact summary heading appears immediately preceding the impact description (Summary Heading of Impact in this example). The impact number identifies the section of the report (AES for Aesthetics, Light, and Glare in this example) and the sequential order of the impact (1 in this example) within that section. To the right of the impact number is the impact statement, which identifies the potential impact.**

Impact Analysis

A narrative analysis follows the impact statement. In some cases, the impact discussion will reference State and federal regulations and agency policies that would fully or partially reduce the impact. In addition, policies and programs from applicable local land use plans that partially or fully address impacts may be cited and the proposed project would be evaluated in the context of these requirements.

Level of Significance Before Mitigation

This section identifies the level of significance of the impact before any mitigation is proposed.

Mitigation Measures

Project-specific mitigation measures, beyond requirements contained in other documents or applicable by law, are set off with a summary heading and described using the format presented below:

MM AES-1 Project-specific mitigation is identified that would reduce the impact to the lowest degree feasible. The mitigation number links the particular mitigation to the impact it is associated with (AES-1 in this example); mitigation measures are numbered sequentially.

Level of Significance After Mitigation

This section identifies the resulting level of significance of the impact following mitigation.

Abbreviations used in the mitigation measure numbering are:

Code	Environmental Issue
AES	Aesthetics, Light, and Glare
AG	Agriculture and Forestry Resources

Code	Environmental Issue
AIR	Air Quality
BIO	Biological Resources
CUL	Cultural Resources and Tribal Cultural Resources
ENER	Energy
GEO	Geology, Soils, and Seismicity
GHG	Greenhouse Gas Emissions
HAZ	Hazards and Hazardous Materials
HYD	Hydrology and Water Quality
LAND	Land Use
NOI	Noise
POP	Population and Housing
PUB	Public Services
REC	Recreation
TRANS	Transportation and Traffic
UTIL	Utilities and Service Systems
WILD	Wildfire

Terminology

The Sphere of Influence (SOI) Expansion Area includes several distinct planning boundaries as defined below. The following terms are used throughout this document to describe planning area boundaries within the SOI Expansion Area:

- **SOI Expansion/Project Site:** Includes the whole of the SOI Expansion Area (approximately 952 acres), all of which is currently located in the City's Planning Area and would be incorporated into the City's SOI. The SOI Expansion Area includes: (1) the approximately 445-acre Non-development Area; and (2) the approximately 507-acre Master Plan (Vista Ranch Development Area/Master Plan [MP] Area 1 and MP Area 2).
  - **Non-development Area:** Approximately 445-acre area which would not receive any entitlements as part of the proposed project other than to be included in the SOI Expansion. Land uses, land use designations, and zoning would remain consistent with current uses, designations, and zoning.
  - **Master Plan Area:** Includes approximately 507 acres located entirely within the SOI Expansion Area. The Master Plan contemplates the construction of up to 3,286 residential units, approximately 16 acres of commercial/mixed-uses, approximately 19 acres for an elementary school site, approximately 32 acres for mini-storage, and approximately 59 acres

of parks, trails, and preserved open space. The Master Plan is divided into two distinct planning areas, as further defined below: (1) Vista Ranch Development/MP Area 1, an approximately 368-acre area proposed for immediate development, and (2) MP Area 2, the remaining approximately 139 acres that are anticipated for future development.

- **Vista Ranch Development/MP Area 1:** The approximately 368-acre development area (MP Area 1) includes up to 2,718 residential units, a mixed-use village core area, and trails, parks, and open space. This area would also include transportation infrastructure, including roadways, sidewalks, and bike lanes. The Vista Ranch Development would also include a bridge across the Big Dry Creek Reservoir channel downstream of the spillway.
- **MP Area 2:** This area is approximately 139 acres controlled by several property owners within the Master Plan. MP Area 2 plans for a mix of urban uses as part of the Northeast Urban Center (NEUC) under the City's 1993 General Plan and subsequent General Plan updates. Future development of MP Area 2 is at the discretion of the property owners and subject to project-level analysis at such time as specific projects, if any, are proposed.

Approach to Analysis

Under CEQA, environmental review can occur at different levels of detail depending on the scope and maturity of a proposed development. Two common tiers are:

- Programmatic Evaluation: A programmatic CEQA evaluation assesses the environmental impacts of a broad policy, plan, or series of related actions—such as a general plan update or a multi-phase development. It provides a high-level, comprehensive analysis that sets the foundation for future, more detailed reviews. This level of analysis is useful for identifying cumulative impacts and establishing mitigation strategies that apply across multiple projects or phases.
- Project-Level Evaluation: A project-level CEQA evaluation focuses on the specific, immediate development proposal. It provides detailed analysis of the environmental impacts associated with the construction and operation of a particular project or phase. This includes site-specific studies, such as traffic, air quality, and noise assessments.

The SOI Expansion and Non-development Area are evaluated at a programmatic level within the Revised Draft EIR. Development within MP Area 2 of the Master Plan is also evaluated at a programmatic level within the EIR, meaning that future development within MP Area 2 would undergo individual CEQA evaluations on a project-by-project basis. The Vista Ranch Development is analyzed at a project-level within the EIR.

Cumulative Impacts

"Cumulative impacts" refers to two or more individual impacts that, when considered together, are considerable, or that compound or increase other environmental impacts (CEQA Guidelines § 15355). Cumulative impacts can result from individually minor but collectively significant impacts taking place

over time (40 Code of Federal Regulations [CFR] § 1508.7). Pertinent guidance for cumulative impact analysis is provided in CEQA Guidelines Section 15130:

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable."
- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.
- A project's contribution would be less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
- The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.
- The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

The cumulative impact analysis is guided by the requirements of CEQA Guidelines Section 15130. Key principles established by this section include:

- A cumulative impact only occurs from impacts caused by the proposed project and other past, present, and probable future projects. An EIR should not discuss impacts that do not result from the proposed project.
- When the combined cumulative impact from the increment associated with the proposed project and other past, present, and probable future projects is not significant, an EIR need only briefly explain why the impact is not significant; detailed explanation is not required.
- An EIR may determine that a project's contribution to a cumulative effect impact would be rendered less than cumulatively considerable if a project is required to implement or fund its fair share of mitigation intended to alleviate the cumulative impact.

The cumulative impact analysis in this EIR relies on these principles as the basis for determining the significance of the proposed project's cumulative contribution to various impacts. This analysis evaluates impacts of the proposed project, together with impacts of cumulative development, would result in a cumulatively significant impact. This analysis then considers whether incremental contribution of the impacts associated with implementation of the proposed project would be significant. Both conditions must apply for cumulative effects to rise to the level of significance. Where the proposed project is found to have "no impact" with respect to a specific threshold, it would not combine with impacts from other projects and therefore would not result in cumulative impacts. Accordingly, the discussion of potential cumulative impacts is focused on those thresholds where the proposed project would have a less than significant, less than significant with mitigation, or significant and unavoidable impact.

The discussion of cumulative impacts in this subsection analyzes whether an individual project's contribution to a significant cumulative impact is considerable, when taken together with other past, present, and reasonably foreseeable future projects.

Two approaches to a cumulative impact are articulated in CEQA Guidelines Section 15130(b)(1): (1) The analysis can be based on a list of past, present, and reasonably foreseeable probable future projects producing closely related impacts that could combine with those of a project; or (2) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. The CEQA Guidelines also allow the use of a combined approach if appropriate for a particular resource topic.

If the cumulative analysis utilizes the list approach, the applicable cumulative projects must be identified. If the projections approach is used, the cumulative analysis would include a summary of projections contained in an adopted local, regional, or Statewide plan or related planning document that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information, such as a regional modeling program. Any such document shall be referenced and made available to the public at a location specified by the lead agency.

The geographic context of the cumulative impact analysis will vary from topic to topic. The cumulative impact analysis for each individual resource topic is presented in each resource section of this chapter under the individual impact threshold discussions. The cumulative projects list is predominately used throughout the analysis, with use of the projections approach where appropriate.

Table 3-1: Cumulative Projects List

#	Project Name	Land Use	Location	Approximate Distance from SOI Expansion Area
1	Enzo's Table	• 258 single-family residential units • 24,287 square feet of retail	Southeast corner of North Willow Avenue and West Shepherd Avenue	2.84 miles southwest
2	Heritage Grove Phase 1	• 3,509 single-family residential units • 2,108 multi-family residential units • 996,116 square feet of retail • 650 elementary students	2015 North Hammel Lane	0.99 mile west

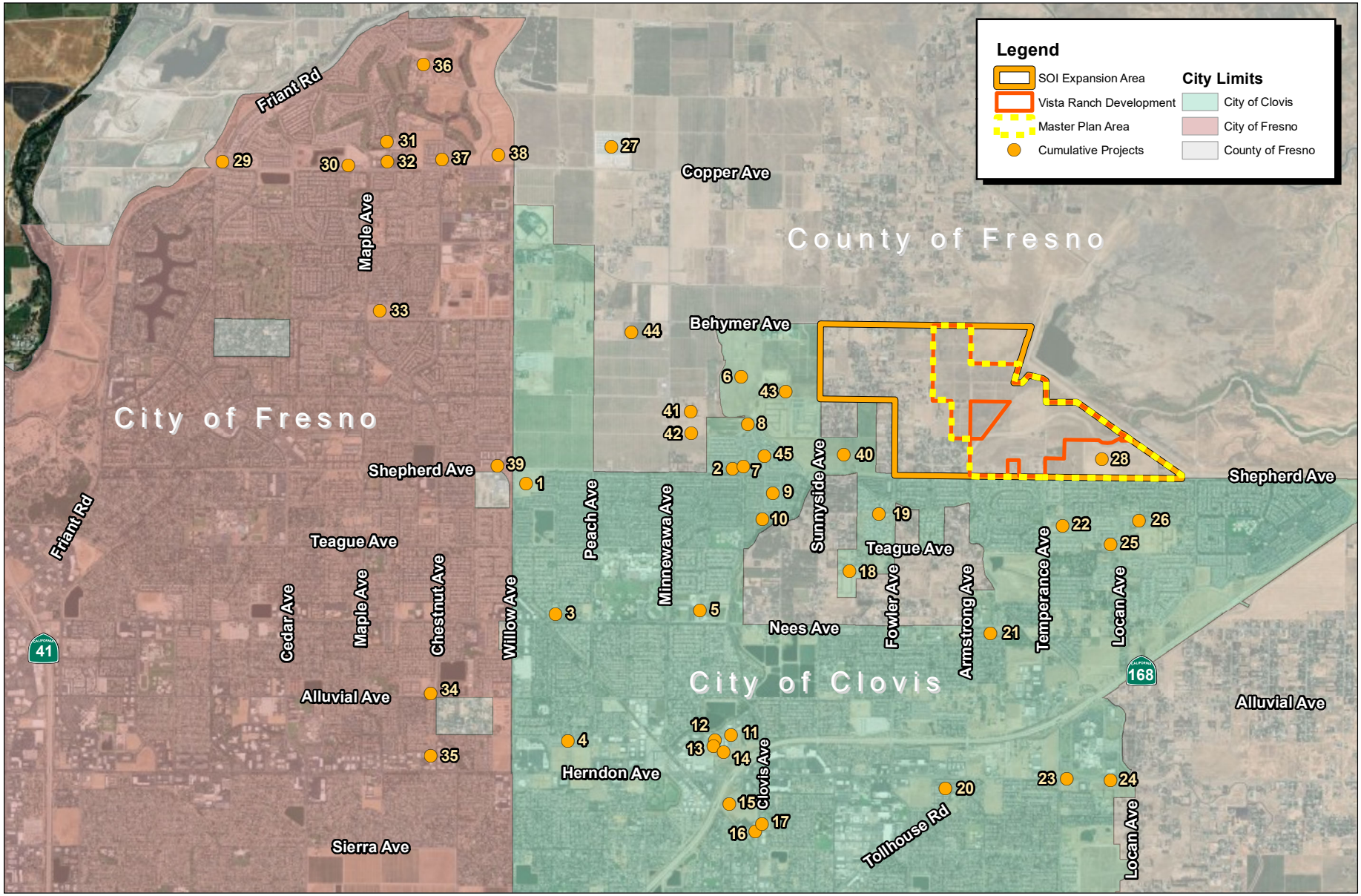
#	Project Name	Land Use	Location	Approximate Distance from SOI Expansion Area
3	Tract Map 6348, northeast of Timmy and Nees	• 10 single-family residential units	Northeast corner of Timmy Avenue and Nees Avenue	2.22 miles southwest
4	Tract Map 6262	• 105 single-family residential units	Northwest corner of North Peach Avenue and West Spruce Avenue	3.13 miles southwest
5	The Well Church	• 80,000-square-foot church	325 Nees Avenue	1.45 miles southwest
6	Tract Map 6343	• 590 single-family residential units	Southeast corner of Minnewawa Avenue and Behymer Avenue	0.52 mile west
7	Tract Map 6050	• 255 single-family residential units	Northwest corner of Clovis Avenue and Shepherd Avenue	0.62 mile southwest
8	Lennar Tract 6200 Phase 1	• 423 single-family residential units	Northeast corner of Clovis Avenue and Shepherd Avenue	0.40 mile west
9	Tract 6263	• 137 single-family residential units	South of Shepherd Avenue and North of Riordan Avenue	1.24 miles southwest
10	Tract Map 6268, southwest of Clovis and Riordan	• 10 single-family residential units	Southwest corner of Clovis Avenue and Riordan Avenue	0.75 mile southwest
11	622 North Pollasky Avenue	• 15,100-square-foot warehouse	622 North Pollasky Avenue	2.14 miles south
12	466 Spruce Avenue	• 11,470-square-foot warehouse	466 Spruce Avenue	2.21 miles south
13	541 DeWitt Avenue	• 7,800-square-foot warehouse	541 DeWitt Avenue	2.25 miles south
14	520 Park Creek	• 9,897-square-foot warehouse	520 Park Creek	2.27 miles south
15	Tru Hotel Site, west of Clovis and Palo Alto	• 86 hotel rooms	West of Clovis Avenue and Palo Alto Avenue	2.63 miles south
16	100 North Clovis Avenue	• 4,406-square-foot medical office	100 North Clovis Avenue	2.73 miles south

#	Project Name	Land Use	Location	Approximate Distance from SOI Expansion Area
17	143 North Clovis Avenue	• 3,298-square-foot office	143 North Clovis Avenue	2.93 miles south
18	Tract Map 6284	• 74 single-family residential units	Southwest of North Fowler Avenue and East Teague Avenue	0.80 mile south
19	Tract Map 6154	• 95 single-family residential units	Southwest corner of Enterprise Trails and North Fowler Avenue	0.34 mile southwest
20	Tract Map 5807 (southwest of Herndon and Armstrong)	• 252 multi-family residential units	Southwest of Herndon Avenue and Armstrong Avenue	2.16 miles south
21	Tract Map 6367 (west of Temperance and Nees)	• 101 single-family residential units	West of Temperance Avenue and Nees Avenue	1.11 miles south
22	Tract Map 6309 (east of Temperance and Shepherd)	• 101 single-family residential units	East of Temperance Avenue and south of Shepherd Avenue	0.25 mile south
23	SPR 90-088A12 (Clovis Community Medical Center Master Plan)	• 468,844-square-foot hospital • 344,392-square-foot medical office • 150 hotel beds • 100 beds–assisted living	2775 Herndon Avenue	1.76 miles southeast
24	SPR 2018-020	• 150 beds–assisted living	2780, 2820, and 2880 Herndon Avenue	2.59 miles southeast
25	Tract 6339	• 37 single-family residential units	West of North Locan Avenue and Trenton Avenue	0.41 mile south
26	Tract Map 6239	• 162 single family residential units	Northeast corner of North Locan Avenue and Loyola Avenue	0.27 mile south
27	CUP 3588 (northwest of Copper and Auberry)	• 38.030 acres campground/RV park	Northwest of Copper Avenue and Auberry Road	2.20 miles northwest
28	CUP 3526 (northwest of Copper and Locan)	• 32.21 acres personal/RV storage facility	Northwest of East Shepherd Avenue and Locan Avenue, County	Within MP Area 2

#	Project Name	Land Use	Location	Approximate Distance from SOI Expansion Area
29	Copper River Apartment (1000 East Copper Avenue)	• 501 multi-family residential units	1000 East Copper Avenue, City of Fresno	5.46 miles west
30	1880 East Copper Avenue	• 23,400-square-feet of retail • 4 fuel positions gas/convenience	1880 East Copper Avenue, City of Fresno	3.63 miles west
31	11075 North Knotting Hill Drive	• 28,000-square-foot office	11075 North Knotting Hill Drive, City of Fresno	3.45 miles northwest
32	2066 East Copper Avenue	• 43,560-square-foot medical office	2066 East Copper Avenue, City of Fresno	3.26 miles northwest
33	Maple and Behymer Commercial and Self Storage Project	• 164.611-square-foot mini warehouse • 6,900-square-feet of retail • 4,587-square-feet for fast food • 2,420-square-foot car wash • 16 fuel positions gas/convenience	Northeast corner of North Maple Avenue and East Behymer Avenue	3.08 miles west
34	7521 North Chestnut Avenue	• 105 multi-family residential units	7521 North Chestnut Avenue, City of Fresno	3.28 miles southwest
35	2471 East Fir Avenue	• 18,175-square-foot office	2471 East Fir Avenue, City of Fresno	3.52 miles southwest
36	11479 North Willow Avenue	• 518 single-family residential units	11479 North Willow Avenue, City of Fresno	3.36 miles northwest
37	10047 North Chestnut Avenue	• 106 multi-family residential units	10047 North Chestnut Avenue, City of Fresno	2.71 miles west
38	Tract 6249	• 274 single-family residential units • 28,000 square feet of retail	Southwest corner of Copper Avenue and Willow Avenue	3.15 miles northwest
39	2884 East Shepherd Avenue	• 1,070 square feet for fast food	2884 East Shepherd Avenue, City of Fresno	2.07 miles west

#	Project Name	Land Use	Location	Approximate Distance from SOI Expansion Area
40	TTM 6205	• 580 lots total between 6205, 6457, and 6458 (phases)	Northeast of Sunnyside Avenue and Shepherd Avenue	2.8 miles south
41	TM 6467	• 162 lots	Southeast corner of Perrin Road and Minnewawa Avenue	1.99 miles west
42	TM 6375	• 385 lots	6375 Dockery Avenue	4 miles southeast
43	TM 6452	• 153 lots	Northeast corner of North Baron Avenue and Perrin Road	1.43 miles west
44	TM 6482	• 269 lots	South of East Behymer Avenue between North Minnewawa Avenue and the North Peach Avenue alignment	1.85 miles northwest

Note:
Cumulative Project Nos. 4, 7, 11, 12, 13, 14, 16, 17, 19, 20, and 23 have already been constructed and are fully built out. These projects remain included in the cumulative projects list because the cumulative analysis considers past, present, and reasonably foreseeable future projects that contribute to the environmental setting and cumulative conditions. Accordingly, the completion of these projects does not warrant their removal from the cumulative projects list.



Source: ESRI Aerial Imagery. County of Fresno. City of Clovis. Harbour & Associates Civil Engineers, 08/21/2025.

5,000 2,500 0 5,000 Feet

Exhibit 3-1
Cumulative Projects

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3.1 - Aesthetics, Light, and Glare

3.1.1 - Introduction

This section describes the existing aesthetics, light, and glare conditions in the project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to aesthetics that could result from implementation of the proposed project. Descriptions and analysis in this section are based, in part, on review of the City of Clovis General Plan (General Plan) and General Plan and Development Code Update Environmental Impact Report (General Plan EIR).

The following public comments were received during the Revised Draft EIR Notice of Preparation (NOP) scoping period related to aesthetics.

- Comment expressing concerns related to a loss of natural beauty. (pp. 3.1-11 to 3.1-21)
- Comment expressing disappointment that orchards were cut down for development. (pp. 3.1-11 to 3.1-14)
- Comment(s) expressing concerns related to a loss of views. (pp. 3.1-11 to 3.1-15)
- Comment expressing concerns related to loss of habitat/nature impacting views. (pp. 3.1-11 to 3.1-15)
- Comment stating concern about light pollution. (pp. 3.1-22 to 3.1-29)

3.1.2 - Environmental Setting

Visual Character

Visual character in the California Environmental Quality Act (CEQA) context is an impartial description of the defining physical features, landscape patterns, and distinctive physical qualities within a landscape. Visual character is informed by the composition of land, vegetation, water, and structure and their relationship (or dominance) to one another and by prominent elements of form, line, color, and texture that combine to define the composition of views. Visual character-defining resources and features within a landscape may derive from notable landforms, vegetation, land uses, building design and façade treatments, transportation facilities, overhead utility structures and lighting, historic structures or districts, or panoramic open space.

City of Clovis

The City of Clovis (City) is in California's San Joaquin Valley and, like most communities in the region, features a flat landscape organized around an orthogonal system of roadways. Because of its rapid growth in recent years and its adjacency to the City of Fresno, the City has a largely suburban character. Most of the City's land area is devoted to low-density residential neighborhoods. However, because the community has grown from a small farming town and is still surrounded by agricultural land uses on three sides, the City retains a rural atmosphere. The suburban/rural interface is most prominent on the City's eastern, southeastern, and southern edges. In these locations, new housing

subdivisions are sited between working farms and large residential estate lots of 2 to 5 acres. The Sphere of Influence (SOI) beyond the city limits to the east, northeast, and north is dominated by agricultural uses and undeveloped open spaces.

SOI Expansion Area

The entire SOI Expansion Area is located adjacent to the City's northern limits. The immediate surrounding area is best characterized as a mix of agricultural, suburban residential, and large estate lots with existing residences, including a portion of the Harlan Ranch Development to the southeast.[1] Presently, the SOI Expansion Area consists of a combination of fallow and grazing land, several rural residences, offices, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. Within the SOI Expansion Area, a small portion of the Non-development Area contains agricultural orchards. Topographically, the SOI Expansion Area is characterized as flat to gently sloping southerly and westerly, with elevations varying from approximately 385 to 400 feet above mean sea level (AMSL). There is a knoll at the northeast corner of the project area that varies in elevation from 395 to 440 feet AMSL.

Visual Resources

The City is in the San Joaquin Valley, which possesses multiple visual resources within the City and the surrounding unincorporated areas of Fresno County (County).

Visual resources are generally classified into two categories: scenic vistas and scenic resources. Scenic vistas are elements of the broader viewshed such as mountain ranges, valleys, and ridgelines. They are usually mid-ground or background elements of a viewshed that can be seen from a range of viewpoints, often along a roadway or other corridor. Scenic resources are specific features of a viewing area (or viewshed) such as trees, rock outcroppings, and historic buildings. They are specific features that act as the focal point of a viewshed and are usually foreground elements. Scenic resource quality is an assessment of the uniqueness or desirability of a visual element.

Scenic Resources

City of Clovis

Aesthetic features occur in many different settings within the region, such as urban centers, residential subdivisions, rural agricultural lands, and natural water bodies. Features of the built environment that may also have visual significance include individual or groups of structures that are distinctive due to their aesthetic, historical, social, or cultural significance or characteristics. Examples of the visually significant built environment may include bridges or overpasses, architecturally appealing buildings or groups of buildings, landscaped freeways, and a location where a historic event occurred.

[1] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

The foothills and the mountains of the Sierra include a scenic backdrop for the City. The Sierra Nevada also provides a broad array of recreational opportunities to residents of Clovis and is directly accessible from the City via State Route (SR) 168 or the "Sierra Freeway," which is a limited access roadway in urbanized Fresno and Clovis that bisects the City. Natural resources in the Sierra Nevada foothills near Clovis include Millerton Lake State Recreation Area 14 miles to the north and Pine Flat Lake 30 miles to the east. The City itself contains no substantial, undeveloped natural resources other than the grasslands in its northeastern quadrant, north of Shepherd Avenue and Tollhouse Road/SR-168. Outside of this area, there are only remnants of native habitats and vegetation communities. However, irrigation canals throughout the City provide a scenic quality to the rural character of the region. The City also features numerous improved parks and green space areas that offer greenery and recreational opportunities to residents, such as the botanical gardens and a network of multipurpose trails. These open spaces also provide visual buffers that break up the monotony of the built environment.[2]

SOI Expansion Area

The SOI Expansion Area currently is composed of a combination of fallow and grazing land, several rural residences, offices, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. The proposed Vista Ranch Master Plan (Master Plan) Area is bifurcated by the Big Dry Creek outlet works channel. The Non-development Area contains existing rural residential land uses, agricultural and previously disturbed fields, comprised of a mix of native and non-native species.

Scenic Vistas

City of Clovis

The adopted Clovis General Plan discusses scenic "landscape features" in its Open Space and Conservation Element. The element identifies Clovis, Shaw, and Herndon Avenues as gateways to the community and important visual links to Old Town Clovis from the greater Fresno area. The element states that "the identity of the gateways will be established through landscape design and features reflecting the historic and 'small town' atmosphere." Although the three identified corridors are quite long and contain substantial segments that do not provide scenic vistas, the corridors physically and visually tie the community together. Other arterial roadways that travel east to west through the Plan Area, such as Shepherd, Bullard, and Ashlan Avenues, 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 aesthetic and community value of the City's central district and major corridors are explained further below. Agricultural lands have become important visual resources that also contribute to the community identity of Clovis and the Central

[2] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

Valley region. Agricultural lands provide for visual relief from urbanized areas and act as community separators to nearby urban areas.[3]

SOI Expansion Area

Rolling grassy hills are visible from the City's northeastern quadrant, north of Shepherd Avenue and Tollhouse Road/SR-168 near the Friant-Kern Canal. These hills are outside the City and SOI boundaries. Grade separations along SR-168, generally located at major interchanges, create some artificial changes in topography that offer limited views of the Sierra Nevada Mountains to the east. However, the remainder of the Clovis area is relatively flat and, in certain view corridors, provides clear views of the Sierra Nevada Mountains during certain times of the year.

Scenic Highways and Corridors

Scenic highways and corridors make major contributions to the quality of life enjoyed by the residents of a region. The development of community pride, the enhancement of property values, and the protection of aesthetically pleasing open spaces reflecting a preference for the local lifestyle are all ways in which scenic corridors are valuable to residents.

Scenic highways and corridors can also strengthen the tourist industry. For many visitors, highway corridors will provide their only experience of the region. Enhancement and protection of these corridors ensures that the tourist experience continues to be a positive one and, consequently, provides support for the tourist-related activities of the region's economy.[4]

Scenic Highways

A scenic highway is generally defined by the California Department of Transportation (Caltrans) as a public highway that traverses an area of outstanding scenic quality, containing striking views, flora, geology, or other unique natural attributes. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. No officially designated State Scenic Highways are located within the City. The nearest eligible State Scenic Highway to the City is SR-168, which is located more than 1 mile to the south of the SOI Expansion Area at its closest point. An eligible State Scenic Highway is a public highway identified by Caltrans as having outstanding scenic quality and potential for designation into the State Scenic Highway system but has not been officially designated as a State Scenic Highway. The SOI Expansion Area is not visible from this roadway segment.[5]

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[3] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

[4] California Department of Transportation (Caltrans). 2025. Scenic Highways, California State Scenic Highways. Website: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic highways. Accessed March 13, 2025.

[5] Ibid.

Scenic Corridors

A scenic corridor is the view from a roadway that may include a distant panorama and/or the immediate roadside area. A scenic corridor encompasses the outstanding natural features and landscapes that are considered scenic. It is the visual quality of the manufactured or natural environments within a scenic corridor that are responsible for its scenic value. Commonly, the physical limits of a scenic corridor are broken down into foreground views (0 to 0.25 mile) and distant views (more than 0.25 mile). In addition to distinct foreground and distant views, the visual quality of a scenic corridor is defined by special features, which include:

- Focal points–prominent natural or manufactured features which immediately catch the eye.
- Transition areas–locations where the visual environment changes dramatically.
- Gateways–locations which mark the entrance to a community or geographic area.

City of Clovis

The following roadways serve as gateways to the community and important visual links to Old Town Clovis from the greater Fresno Area: Clovis, Shaw, and Herndon Avenues. Although the three identified corridors are quite long and contain substantial segments that do not provide scenic vistas, the corridors physically and visually tie the community together. Other arterial roadways that travel east to west through the City, such as Shepherd, Bullard, and Ashlan Avenues, span the community's suburban/rural interface. 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. Segments of these roadways in the SOI are in transition from agrarian to urban.

SOI Expansion Area

East Shepherd Avenue is located immediately south of the SOI Expansion Area and is developed to urban standards with few exceptions from Friant Road to the west to the intersection of SR-168 to the east. The highest scenic qualities along Shepherd Avenue occur east of SR-168 in the areas that are largely undeveloped with rural residences. The views of the rolling grassy hills near the Friant-Kern Canal, pastoral agrarian areas, and the Sierra Nevada foothills to the east from the Shepherd Avenue corridor are highly valued by visitors and residents of the City.

Light and Glare

In the context of the CEQA Guidelines, light is nighttime illumination that stimulates sight and makes things visible while glare relates to difficulty seeing in the presence of bright light, such as direct or reflected sunlight.

Nighttime lighting is necessary to provide and maintain a safe and secure environment. Light that falls beyond the intended area of illumination is referred to as "light trespass." Types of light trespass include spillover light and glare. Spillover light, which is light that illuminates surfaces beyond the intended area, is typically caused by artificial lighting sources, such as from building security lighting, signs, parking lot lights, roadway lights, and stadium lights on playing fields. Spillover light can adversely affect light-sensitive uses (i.e., adjacent residences) by creating unwanted illumination. Because light dissipates as it moves farther from its source, the intensity of the lighting source is often

increased to compensate for dissipating light, which can increase the amount of light that illuminates adjacent uses. The type of light fixture determines the extent to which light will spill over onto adjacent properties and/or be visible from far away. Modern, energy-efficient fixtures that face downward, such as cutoff-type fixtures and shielded light fixtures, are less obtrusive than light fixtures that have been used in the past.

City of Clovis

The variety of developed and inhabited land uses in the City are the main source of daytime and nighttime light and glare. They are typified by single- and multi-family residences, commercial structures, industrial areas, and streetlights. These areas and their associated human activities, such as vehicular traffic, characterize the existing light and glare environment present during daytime and nighttime hours in the urbanized portions of the City. Sources of light and glare in the City include building (interior and exterior), security, sign illumination, and parking-area lighting. Other sources of nighttime light and glare include streetlights and vehicular traffic along surrounding roadways.

Additionally, it is recognized that there is a significant amount of ambient lighting from surrounding communities and roadways in the City. As the City is adjacent to highly urbanized portions of the City of Fresno to the west and south, ambient light in the community is substantially impacted by land uses in Fresno. Large, light-intensive institutions and facilities near the City's boundary include Fresno Yosemite International Airport and California State University Fresno.[6]

Sources of glare in developed and inhabited portions of the City come from light reflecting off surfaces, including glass and car windshields and certain siding and paving materials, as well as metal roofing. The developed and inhabited areas of the City contain streetlights, sidewalks, and paved parking areas, which reflect street and vehicle lights. The developed rural residential areas of the City (including unincorporated County) generally do not contain streetlights or sidewalks but typically have dirt or gravel parking areas on the property frontage with reflective properties.

Sky glow is the effect created by light reflecting into the night sky. Sky glow is of particular concern in areas surrounding observatories, where darker night sky conditions are necessary, but it is also of concern in more rural or natural areas where a darker night sky is either the norm or is important to wildlife. Developed areas have existing light sources that illuminate the night sky. In other words, sky glow is considered part of the existing conditions (i.e., the baseline conditions under CEQA). Sky glow can increase significantly based on certain intensive uses—such as a project that contemplates stadium lights, spotlights, and strobe lights.

SOI Expansion Area

There are minimal existing light sources on the SOI Expansion Area, with the exception of the Shepherd Avenue corridor to the south, adjacent to the SOI Expansion Area. The primary existing light sources are existing residential homes, roadways, and accessory structures adjacent to the SOI

[6] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

Expansion Area. Areas within the SOI Expansion Area are mainly rural residential and vacant grazing land. As such, the SOI Expansion Area itself has very few sources of light and glare, allowing for clear day and nighttime views. The existing light and glare environment found in the vicinity of the SOI Expansion Area is considered typical of suburban and rural residential areas. The existing suburban lighting exists along Shepherd Avenue immediately south of the SOI Expansion Area. Streetlights are installed on the south side of this street along the entire southern boundary. The north side of Shepherd Avenue does not have street lighting installed currently, but lighting is proposed as a project design measure.

To the north of Shepherd Avenue, in the Non-development Area of the SOI Expansion Area, there is a mix of rural residential areas, that have a lower intensity of lighting than what is common in the suburban neighborhoods in the vicinity. These existing rural residential areas abut the western boundary of the Master Plan Area. Immediately to the north and east of the Master Plan Area is vacant undeveloped land that has minimal nighttime lighting.

The rural residential areas within the SOI Expansion Area have typical residential building lighting (i.e., lights on the building structure in the front and backyard, landscaping lighting, and indoor lighting) like the suburban neighborhoods, but there is a lower density of buildings, so overall lighting intensity is lower in these areas as compared to the surrounding suburban lighting. Additionally, some of the rural residential areas do not have street lighting, unlike more intensively developed areas in the vicinity (i.e., neighborhoods south of Shepherd Avenue). However, these areas are typical of developed residential areas within and immediately outside the City, where rural residential neighborhoods are often located adjacent to suburban or inhabited areas. The mix of lighting is typical of many existing neighborhoods within and along the periphery of the City.

3.1.3 - Regulatory Framework

Federal

There are no applicable federal regulations, plans or policies pertaining to aesthetics that are applicable to the proposed project.

State

California Scenic Highway Program

The State Legislature created the California Scenic Highway Program, maintained by Caltrans, in 1963. The purpose of the State Scenic Highway Program is to protect and enhance the natural scenic beauty of California highways and adjacent corridors, through special conservation treatment. The State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or have been officially designated. The status of a proposed State Scenic Highway changes from eligible to officially designated when the local governing body applies to Caltrans for scenic highway approval,

adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway.

California Code of Regulations, Title 24, Part 6

Title 24 of the California Code of Regulations (CCR), Part 6, also known as the California Building Efficiency Standards for Residential and Nonresidential Buildings, consists of regulations to control building standards throughout California. It includes mandatory provisions for lighting control devices and luminaires for all new developments, thereby encouraging energy-efficient development strategies and the methods to prevent light spillover and intrusion.[7]

Regional

County of Fresno Code of Ordinances

The County of Fresno Code of Ordinances identifies land use categories, development standards, and other general provisions that ensure consistency between the County's General Plan and proposed development projects. The following provisions address aesthetics:

- Title 17, Chapter 17.48 (Design and Development Standards): Outlines design and improvement standards for roads, lots, easements, and waterways in the county to provide for adequate traffic circulation and extension of aesthetic values.
- Title 17, Chapter 17.72, Part IV (Design Principles): Provides details to size and configuration of parcels upon division of land to maintain land use compatibility and to efficiently utilize adjacent parcels for future development.

Local

City of Clovis General Plan

The General Plan includes several policies that are relevant to an evaluation of the visual quality of the SOI Expansion Area. The General Plan policies applicable to the proposed project are identified below:[8]

Land Use Element

Policy 3.6 Mix of housing types and sizes. Development is encouraged to provide a mix of housing types, unit sizes, and densities at the block level. To accomplish this, individual projects five acres or larger may be developed at densities equivalent to one designation higher or lower than the assigned designation, provided that the density across an individual project remains consistent with the General Plan.

[7] California Energy Commission (CEC). 2022. Building Energy Efficiency Standards for Residential and Nonresidential Buildings. Website: https://www.energy.ca.gov/sites/default/files/2022-12/CEC-400-2022 010_CMF.pdf. Accessed March 13, 2025.

[8] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Policy 4.3 Future environmental clearance. The City shall monitor development and plan for additional environmental clearance as development levels approach those evaluated in the General Plan EIR.

Policy 4.4 Farmland conservation. Participate in regional farmland conservation, including the establishment of comprehensive agricultural preserves or easements, through efforts such as the Fresno County Model Farmland Conservation Program or the San Joaquin Valley Greenprint.

Circulation Element

Policy 3.11 Right-of-way design. Design landscaped parkways, medians, and right-of ways as aesthetic buffers to improve the community's appearance and encourage non-motorized transportation.

Policy 3.12 Residential orientation. Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets, and encourage pedestrian and bicycle access.

Open Space and Conservation Element

Policy 2.3 Visual resources. Maintain public views of open spaces, parks, and natural features. Enhance views along roadways and trails. Preserve Clovis's viewshed of the surrounding foothills and orient new development to capitalize on views of the Sierra Nevada.

Policy 3.4 Drought-tolerant landscaping. Promote water conservation through the use of drought-tolerant landscaping on existing and new residential properties. Require drought-tolerant landscaping for all new commercial and industrial development and City-maintained landscaping, unless used for recreation purposes.

City of Clovis Municipal Code

Chapter 9.28, Landscaping Standards, of the City of Clovis Municipal Code (CMC) contains standards and provisions related to landscaping design requirements that would apply to the proposed project. The primary intent of Chapter 9.28, Landscaping Standards, is to enhance the appearance of all development by providing standards relating to the quality, quantity, and functional aspects of landscaping and landscape screening; protect public health, safety, and welfare by minimizing the impact of all forms of physical and visual pollution, controlling soil erosion, screening incompatible land uses, preserving the integrity of existing residential neighborhoods, and enhancing pedestrian and vehicular traffic and safety; and decrease the use of water for landscaping purposes by requiring the efficient use of irrigation, appropriate plant materials, and regular maintenance of landscaped areas.

Section 9.22.050, Exterior light and glare, of the Clovis Development Code (Title 9 of the CMC) contains standards and provisions related to exterior lighting which require that light be shielded so that light does not spill onto adjacent properties; is architecturally integrated with the character of on-

site and adjacent structures; and incorporate height, intensity, and scale appropriate to the uses being served.

Section 9.24, Property Development and Use Standards, includes provisions designed to ensure that all development in the City is implemented in a stable and desirable manner that is harmonious with existing and future development, protecting the use and enjoyment of neighboring properties, consistent with the General Plan.

3.1.4 - Methodology

This analysis provides a discussion of the visual impacts associated with the proposed project and the area surrounding the SOI Expansion Area. Several variables affect the degree of visibility, visual contrast, and ultimately project impacts: (1) scale and size of facilities, (2) viewer types and activities, (3) distance and viewing angle, and (4) influences of adjacent scenery or land uses. Viewer response and sensitivity vary depending on viewer attitudes and expectations. As part of this analysis, FirstCarbon Solutions (FCS) reviewed the General Pan, General Plan EIR, and CMC to determine applicable policies and design requirements for the proposed project.

Cumulative Analysis

The geographic scope of the cumulative aesthetics analysis is the visible area surrounding the SOI Expansion Area. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to aesthetics. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. The analysis also considers the foreseeable development projects listed in Table 3-1 (See Chapter 3, Environmental Impact Analysis) in the City and surrounding area that would be visible from the SOI Expansion Area in addition to the proposed project. If there is no impact associated with respect to a particular CEQA threshold, the proposed project would not contribute to the cumulative condition and discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.1.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to aesthetics, light, and glare are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

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 building within a State Scenic Highway.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage 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.

3.1.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Scenic Vistas

Impact AES-1:	**The proposed project would not have a substantial adverse effect on a scenic vista.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the existing visual character of the Non-development Area would not change as part of this proposed project. Approval of the SOI Expansion would not result in physical development and as such would not alter, interfere, or impact a scenic vista. Therefore, no impacts would occur.

MP Area 2

Development of MP Area 2 would change the visual character of the SOI Expansion Area, as it would convert the approximately 139-acre MP Area 2 from its existing use, which consists of a combination of fallow and grazing land, several rural residences, offices, and an existing mini-storage facility. Development of MP Area 2 would potentially result in the removal of the existing use and structures, followed by the future construction of residential, mixed-use, and private community development, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, street lighting, signage and other public and private uses.

No portion of the SOI Expansion Area, including MP Area 2, is designated as a scenic vista by the General Plan or the Fresno County General Plan, nor does any portion of the SOI Expansion Area contain any unique or distinguishing features that would qualify the site for designation as a scenic

vista. However, the City's General Plan EIR states that East Shepherd Avenue can be construed as a scenic corridor under the General Plan Open Space and Conservation Element.[9]

The City's General Plan EIR notes that new development will impact current views of open space, which are primarily vistas of agricultural fields and orchards. These publicly available views are primarily available to motorists traveling along East Shepherd Avenue, as well as East Behymer Avenue, East Perrin Avenue, and North Fowler Avenue, which is currently the only publicly accessible roadway within the Master Plan Area. Implementation of the proposed Master Plan would change the existing visual character of MP Area 1 from primarily rural to a developed suburban neighborhood, like existing surrounding uses south of East Shepherd Avenue and to the west of the Master Plan Area. These impacts related to a change in visual character may be considered "attractive" to one viewer and "unattractive" to other viewers. It is noted that the General Plan EIR concluded that adoption of the General Plan, which contemplated urbanization of the agricultural lands within the General Plan study area, was a less than significant impact.[10]

Policy 2.3 of the Clovis General Plan's Open Space and Conservation Element calls for the preservation of scenic vistas, corridors, and scenic resources, such as maintaining public views of open spaces, parks, and natural features; enhancing views along roadways and trails; preserving the City's viewshed of the surrounding foothills; and orienting new development to capitalize on views of the Sierra Nevada range. Implementation of the proposed project would not result in structures that would create an obstruction to publicly available scenic vistas, particularly along East Shepherd Avenue, as any new development would be required to comply with height restrictions, setbacks, and other provisions, which would ensure that such views would be maintained.

The CMC also includes development standards related to landscaping and screening in Sections 9.24 and 9.28, including requirements for fences, walls, and hedges to ensure that these elements minimize screening of scenic views and sunlight by outlining provisions, such as height limitations, design and construction materials, site plan review requirements, allowable fencing materials, etc. Furthermore, screening and buffering requirements of adjoining land uses, utility equipment, and refuse areas are provided. The proposed project would be developed in accordance with all applicable CMC provisions and requirements, thereby ensuring that implementation of the proposed project would not have a substantial adverse impact on scenic vistas, corridors, or resources in the City.

All development would be conducted in accordance with applicable City and County requirements, including landscaping, design, and streetscape requirements. The Master Plan Area would not only consist of residential and suburban development, as it would include approximately 59 acres of parks

[9] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

[10] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

trails and preserved open space, as well as a 19-acre elementary school. These uses would provide visual relief and natural areas within MP Area 2.

To reduce the potential for visual impacts to occur, development within the Master Plan Area would be consistent with the General Plan, CMC and Zoning Ordinance, and Master Plan, as described above. These standards include specifications for building height, massing, and orientation, exterior lighting standards, and landscaping standards. Compliance with the City's design, construction, and maintenance requirements is intended to result in an internally cohesive project, which would maintain an aesthetic feel like that of the surrounding urban uses. As such, the proposed Master Plan would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Construction

During construction of the proposed Vista Ranch Development, visual impacts would be temporary and intermittent over the phased construction period. Short-term impacts associated with project construction would occur as construction equipment, materials movement, and new vehicular access and traffic sources are added to MP Area 1 and surrounding area. This would be visible to residential uses and other drivers using adjacent area roadways. As individual construction phases are completed, the amount of equipment would be reduced and moved to other areas of MP Area 1 during later phases. As such, the visual characteristics of construction would be spread out to different locations within a large area. Because of the temporary, varied, phased, and intermittent nature of construction activities, impacts to visual character and publicly available views would be short term, phased, and spread over different areas of the SOI Expansion Area, thereby reducing the visual impacts of construction activities. Therefore, construction impacts would be less than significant.

Operation

The visual loss of rural land in MP Area 1 would result in a permanent change to the visual character of the SOI Expansion Area in perpetuity; however, compliance with General Plan policies, as well as the CMC related to the design, construction, and maintenance of the proposed project, would be required. CMC Title 9, Development Code Division 3, includes a series of development and operational standards intended to minimize and mitigate the potential impacts of development within the City and promote compatibility with surrounding areas and land uses. These standards include requirements related to exterior light and glare (Section 9.22.050), fences, walls, and hedges (Section 9.24.060), height measurement and height limit exceptions (Section 9.24.080), screening and buffering (Section 9.24.090), setback regulations and exceptions (Section 9.24.100), landscaping standards (Chapter 9.28), tree protection standards (Chapter 9.30), and signs (Chapter 9.34). Some of these standards and requirements from pre-existing regulations would be implemented after project entitlement, when more detailed site planning, engineering, and architecture is performed.

The CMC implements the policies of the Clovis General Plan by classifying and regulating the uses of land and structures within the City. The CMC was adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City.

These existing requirements provide standards for the orderly growth and development of the City to establish and maintain the community's history and quality characteristics in appropriate locations. It requires high quality planning and design for development that enhances the visual character of the City, avoids conflicts between land uses, encourages the appropriate mix of uses, and preserves the scenic qualities of the City. It also creates a comprehensive and stable pattern of land uses upon which to plan sewerage, transportation, water supply, and other public facilities and utilities. Overall, these mandatory requirements are effective in reducing potential visual impacts. Compliance with all applicable regulations would reduce potential impacts related to scenic resources and visual character resulting from project implementation. Compliance with the applicable regulations would therefore reduce potential impacts related to effects on scenic vistas and resources or substantial degradation of visual character resulting from implementation of the Vista Ranch Development. As such, operational impacts of the development would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

As discussed above, under cumulative conditions, buildout of the General Plan for the City and the surrounding jurisdictions could result in changes to the visual character and quality of the City through development of undeveloped areas and/or changes to the character of existing communities. Development of the proposed project, in addition to other future projects in the area, would change the existing visual and scenic qualities of the City and would be required to adhere to the City's adopted specific landscape and design standards to enhance the visual appearance of the scenic vistas within the City and reduce potential impacts to scenic vistas. As such, cumulative impacts would be less than significant.

To reduce the visual impacts of the development, development within MP Area 2 is required to be consistent with the General Plan and the Clovis Zoning Ordinance, which includes standards related to landscaping and screening. The proposed project would be developed in accordance with all applicable CMC provisions and requirements, as well as compliance with the Vista Ranch Master Development Plan, thereby ensuring that implementation of the Master Plan would not have a substantial adverse impact on scenic vistas, corridors, or resources in the City. Therefore, the

proposed project would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development/MP Area 1

As discussed above, under cumulative conditions, buildout of the General Plan for the City and the surrounding jurisdictions could result in changes to the visual character and quality of the City through development of undeveloped areas and/or changes to the character of existing communities. Development of the proposed project, in addition to other future projects in the area, would change the existing visual and scenic qualities of the City and would be required to adhere to the City's adopted specific landscape and design standards to enhance the visual appearance of the scenic vistas within the City and reduce potential impacts to scenic vistas. As such, cumulative impacts would be less than significant.

To reduce visual impacts, the Vista Ranch Development would be required to be consistent with the General Plan and the Clovis Zoning Ordinance, which includes standards related to landscaping and screening. The proposed project would be developed in accordance with all applicable CMC provisions and requirements, thereby ensuring that implementation of the Vista Ranch Development would not have a substantial adverse impact on scenic vistas, corridors, or resources in the City. Therefore, the proposed project would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Scenic Highways

Impact AES-2:	**The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.**

Impact Analysis

If the SOI Expansion Area is not located within a State Scenic Highway corridor, it may be presumed to have a less than significant impact absent substantial evidence to the contrary.

There are no designated State Scenic Highways within the SOI Expansion Area and no officially designated State Scenic Highways in the City. The nearest eligible State Scenic Highway to the City is SR-168, which is located more than 1 mile to the south of the SOI Expansion Area at its closest point, and the SOI Expansion Area is not visible from this roadway segment.

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, there are no designated State Scenic Highways within the SOI Expansion Area. Accordingly, there would be no impact to resources within a State Scenic Highway associated with approval of the SOI Expansion Area. Additionally, the SOI Expansion Area would not result in physical development and as such would not alter, interfere, or impact scenic resources within a State Scenic Highway. In the absence of designated scenic highways within the SOI Expansion Area and distance from SR-168, the SOI Expansion would have no impacts on scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings visible from a designated (or eligible) State Scenic Highway.

MP Area 2

As discussed above, there are no officially designated State Scenic Highways in the City. The nearest eligible State Scenic Highway to the City is SR-168, which is located more than 1 mile to the south of the SOI Expansion Area at its closest point. The Master Plan Area is not visible from this roadway segment. Furthermore, there are no eligible highway segments in the project vicinity that may be included in the State Scenic Highway System. As such, no impact would occur.

Vista Ranch Development/MP Area 1

There are no designated State Scenic Highways within MP Area 1 because there are no officially designated State Scenic Highways in the City. The nearest eligible State Scenic Highway to the City is SR-168, which is located more than 1 mile to the south of the SOI Expansion Area at its closest point. MP Area 1 is not visible from this roadway segment. Furthermore, there are no eligible highway segments in the project vicinity that may be included in the State Scenic Highway System. As such, no impact would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

As explained in Impact AES-2, there are no designated scenic highways within the City. The nearest eligible State Scenic Highway to the City is SR-168, which is located more than 1 mile south of the SOI Expansion Area at its closest point. Accordingly, there would be no cumulative impact related to scenic highways. Moreover, the proposed project would have no impact on scenic highways and, therefore, would not have any contribution to cumulative impacts.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Visual Character

Impact AES-3: **The proposed project is within a non-urbanized area. The proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.**

Impact Analysis

The proposed project is located in a non-urbanized area, and, therefore, impacts to scenic quality are analyzed in terms of whether the proposed project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the existing visual character of the Non-development Area would not change as part of this proposed project. The proposed SOI Expansion would not result in the degradation of existing visual character. As such, no impact would occur.

MP Area 2

Development consistent with the proposed Master Plan would change the visual character of the SOI Expansion Area, as it would convert the approximately 139-acre MP Area 2 from its existing use, which consists of a combination of rural fallow and grazing land, several rural residences, offices, and an existing mini-storage facility. Development of the Master Plan would result in the removal of all existing uses and structures, followed by the future construction of the uses described above, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, street lighting, signage and other public and private uses.

The General Plan EIR notes that new development will impact current views of open space, which are primarily vistas of agricultural fields and orchards. These publicly available views are primarily available to motorists traveling along East Shepherd Avenue, as well as East Behymer, East Perrin Avenue, and North Fowler Avenue, which is currently the only publicly accessible roadway within the Master Plan Area. Implementation of the proposed Master Plan would change the existing visual character of the Master Plan Area from primarily rural to a developed suburban neighborhood, like existing surrounding uses south of East Shepherd Avenue and to the west of the Master Plan Area. These impacts related to a change in visual character may be considered “attractive” to one viewer and “unattractive” to other viewers. It is noted that the General Plan EIR concluded that adoption of

the General Plan, which contemplated urbanization of the agricultural lands within the General Plan study area, was a less than significant impact.[11]

Policy 2.3 of the Clovis General Plan Update's Open Space and Conservation Element calls for the preservation of scenic vistas, corridors, and scenic resources, such as maintaining public views of open spaces, parks, and natural features; enhancing views along roadways and trails; preserving Clovis's viewshed of the surrounding foothills; and orienting new development to capitalize on views of the Sierra Nevada range.

The largely rural character of MP Area 2 can be considered to provide visual relief from urban development and defining the regional character. The proposed Master Plan would permanently remove existing uses in the Master Plan Area, which are largely rural in character, and it would introduce new development and supporting infrastructure, which would be extended into the Master Plan Area; however, the surrounding areas to the south, west and north of the Master Plan Area are already developed with urban and residential uses. Furthermore, the proposed Master Plan would include 59 acres of parks, trails and preserved open space uses, which would provide visual relief to new development within the Master Plan Area.

Under some circumstances, loss of rural and agricultural lands could have an adverse cumulative impact on the overall visual character and quality of a region; however, the remaining rural uses in MP Area 2 are largely unused or used for grazing, and the existing structures and their frontages are not well maintained and underutilized. Furthermore, the Master Plan Area is already surrounded by developed homes to the west, north, and south, demonstrating that much of the immediately surrounding vicinity has already changed its aesthetic character to suburban residential. While the proposed project would change the existing aesthetic of the Master Plan Area to a more suburban nature, consistent with City of Clovis requirements, the current suburban theme would be extended with implementation of the proposed Master Plan.

It is important to note that while the visual character of the Master Plan Area would be changing with future implementation of the Vista Ranch Development, the resulting development would be visually compatible with the aesthetics of the surrounding vicinity and would not result in a degradation of visual character. All development would be conducted in accordance with applicable City and County requirements, including landscaping, design, and streetscape requirements. The Master Plan Area would not only consist of residential and suburban development, as it would include approximately 59 acres of parks, trails and preserved open space, as well as a 19-acre elementary school. These uses would provide visual relief and natural areas within MP Area 2.

To reduce the potential for visual impacts to occur, development within MP Area 2 would be consistent with the General Plan, the CMC and Zoning Ordinance, and Master Plan, as described above. These standards include specifications for building height, massing, and orientation, exterior

[11] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

lighting standards, and landscaping standards. Compliance with the City's design, construction, and maintenance requirements is intended to result in an internally cohesive project, which would maintain an aesthetic feel like that of the surrounding urban uses. As such, the proposed Master Plan would not substantially degrade the existing visual character or quality and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Construction

During construction of the proposed Vista Ranch Development, visual impacts would be temporary and intermittent over the phased construction period. Short-term impacts associated with project construction would occur as construction equipment, materials movement, and new vehicular access and traffic sources are added to the SOI Expansion Area and surrounding area. This would be visible to residential uses and other drivers using adjacent area roadways. As individual construction phases are completed, the amount of equipment would be reduced and moved to other areas of the SOI Expansion Area during later phases. As such, the visual characteristics of construction would be spread out to different locations within a large area. Because of the temporary, varied, phased, and intermittent nature of construction activities, impacts to visual character and publicly available views would be short term, phased, and spread over different areas of the SOI Expansion Area, thereby reducing the visual impacts of construction activities. Therefore, construction would not substantially degrade the existing visual character or quality and impacts would be less than significant.

Operation

The visual loss of rural land in MP Area 1 would result in a permanent change to the visual character of the SOI Expansion Area in perpetuity; however, compliance with General Plan policies, as well as the CMC related to the design, construction, and maintenance of the proposed project, would be required. CMC Title 9, Development Code Division 3, includes a series of development and operational standards which are intended to minimize and mitigate the potential impacts of development within the City and promote compatibility with surrounding areas and land uses. These standards include requirements related to exterior light and glare (Section 9.22.050), fences, walls, and hedges (Section 9.24.060), height measurement and height limit exceptions (Section 9.24.080), screening and buffering (Section 9.24.090), setback regulations and exceptions (Section 9.24.100), landscaping standards (Chapter 9.28), tree protection standards (Chapter 9.30), and signs (Chapter 9.34). Some of these standards and requirements from pre-existing regulations are implemented after project entitlement, when more detailed site planning, engineering, and architecture is performed.

The CMC implements the policies of the General Plan by classifying and regulating the uses of land and structures within the City. The CMC is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City. These existing requirements provide standards for the orderly growth and development of the City to establish and maintain the community's history and quality characteristics in appropriate locations. It requires high quality planning and design for development that enhances the visual character of the City, avoids conflicts between land uses, encourages the appropriate mix of uses, and preserves the scenic qualities of the City. It also creates a comprehensive and stable pattern of land uses upon

which to plan sewage, transportation, water supply, and other public facilities and utilities. Overall, these mandatory requirements are effective in reducing potential visual impacts. Compliance with all applicable regulations would reduce potential impacts related to scenic resources and visual character resulting from implementation of the proposed project. Compliance with the applicable regulations would therefore reduce potential impacts related to substantial degradation of visual character resulting from implementation of the Vista Ranch Development. As such, impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Under cumulative conditions, buildout of the General Plan for the City and the surrounding jurisdictions could result in changes to the visual character and quality of the City through development of undeveloped areas and/or changes to the character of existing communities. However, with adherence to the design review process, past, present and reasonably foreseeable development would be consistent with the General Plan and zoning, and there would be a less than significant cumulative impact.

Development of the proposed project would change the visual character of MP Area 2, leading to more intense development within MP Area 2 compared to existing uses. These impacts related to a change in visual character may be considered “attractive” to one viewer and “unattractive” to other viewers. It is noted that the Clovis General Plan EIR concluded that adoption of the General Plan, which contemplated urbanization of the agricultural lands within the General Plan study area, was a less than significant impact.[12]

To reduce the visual impacts, development within MP Area 2 is required to be consistent with the General Plan and the Clovis Zoning Ordinance, which includes standards related to landscaping and screening. The proposed project would be developed in accordance with all applicable CMC

[12] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

provisions and requirements as well as compliance with the proposed Master Plan, thereby ensuring that implementation of the proposed project would not have a substantial adverse impact on scenic vistas, corridors, or resources in the City. Therefore, the proposed project's incremental contribution to the less than significant cumulative impact would not be cumulatively considerable. Cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

Under cumulative conditions, buildout of the General Plan for the City and the surrounding jurisdictions could result in changes to the visual character and quality of the City through development of undeveloped areas and/or changes to the character of existing communities. However, with adherence to the design review process, past, present and reasonably foreseeable development would be consistent with the General Plan and zoning, and there would be a less than significant cumulative impact.

Development of the proposed project would change the visual character of MP Area 1 leading to more intense development within MP Area 1 compared to existing uses. These impacts related to a change in visual character may be considered "attractive" to one viewer and "unattractive" to other viewers. It is noted that the Clovis General Plan EIR concluded that adoption of the General Plan, which contemplated urbanization of the agricultural lands within the General Plan study area, was a less than significant impact.[13]

To reduce the visual impacts, development within MP Area 1 is required to be consistent with the General Plan and the Zoning Ordinance, which includes standards related to landscaping and screening. The proposed project would be developed in accordance with all applicable CMC provisions and requirements as well as compliance with the proposed Vista Ranch Development, thereby ensuring that implementation of the Vista Ranch Development would not have a substantial adverse impact on scenic vistas, corridors, or resources in the City. Therefore, the proposed project's incremental contribution to the less than significant cumulative impact would not be cumulatively considerable. Cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

[13] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. Aesthetics. June. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-01-Aesthetics.pdf. Accessed February 13, 2025.

Light and Glare

Impact AES-4: The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion would not result in physical development and as such would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. Additionally, no exposure of biological resources to increased glare or nighttime illumination would occur as a result of the proposed project. As such, no impact would occur.

MP Area 2

The existing MP Area 2 is largely undeveloped and does not contain internal sources of nighttime lighting other than lighting associated with a limited number of rural residential structures. As a result, MP Area 2 is not a significant source of glare or nighttime illumination. Portions of the area experience limited ambient light spill from adjacent suburban development, primarily from street lighting and residential uses located south of Shepherd Avenue; however, overall lighting levels within MP Area 2 remain low and are characteristic of rural and suburban conditions on the periphery of the City. Existing suburban lighting is concentrated south of Shepherd Avenue, while rural residential areas to the north and west of MP Area 2 are characterized by lower lighting intensity due to a lower density of development and, in some locations, the absence of streetlights. Immediately north and east of MP Area 2 are vacant, undeveloped lands that currently contain little to no nighttime light sources.

Implementation of the proposed Master Plan would introduce new sources of light to MP Area 2 by converting MP Area 2 from its existing semi-rural condition to an urbanized residential and mixed-use community. Development would include residential neighborhoods, neighborhood-serving uses, roadways, pedestrian and bicycle facilities, parks, and a school, along with associated street lighting, building lighting, and mobile lighting from increased vehicular traffic. While these improvements would introduce new sources of nighttime lighting into areas that are currently minimally illuminated, the type and intensity of lighting would be consistent with adjacent suburban development and local roadways in the project vicinity.

Effects on Nighttime Views (Sky Glow and Light Spill)

MP Area 2 is located within a largely developed area of Fresno County, adjacent to developed land uses. Several existing light sources already affect residential areas and illuminate the night sky. Sky glow is present under existing conditions, and the introduction of a residential development adjacent to those existing developments would not result in a significant increase in sky glow. While sky glow can increase based on certain intensive uses—such as a project that contemplates stadium lights, spotlights, and strobe lights—the proposed project does not have high-intensity lights associated with any of these uses. There would be lighting associated with the proposed school and commercial areas; however, the lighting associated with these uses are not anticipated to include stadium lights, spotlights, or strobe lights, nor would they be of a lighting intensity anticipated to contribute to sky

glow beyond the current baseline for the City. As a result, any increase in sky glow resulting from the proposed Master Plan would be less than significant, and the proposed Master Plan would therefore not result in substantially increased sky glow.

The proposed development in MP Area 2 does not have any areas where there would be resulting light spillover or high-intensity or excessively bright lights. Exterior lighting associated with the proposed Master Plan would be designed and installed in accordance with Section 9.22.050 (Exterior Light and Glare) of the CMC, which requires shielding and design measures to prevent light spill onto adjacent properties. Lighting plans, including fixture types, mounting heights, and photometrics, would be subject to City review and approval as part of improvement and building permits. Standard City street lighting would be pedestrian-scale and shielded to direct light toward the intended area of illumination, thereby reducing impacts related to light spillover into adjacent properties.

Effects of Glare (Daytime Reflection)

Glare impacts are generally associated with highly polished or glass-dominant building surfaces that produce specular reflection, such as mirror-like façades or reflective rooftop materials. In contrast, typical suburban residential materials with which the proposed residential and neighborhood-serving development would be constructed—including stucco, masonry, asphalt paving, and non-reflective roofing—exhibit low or diffuse reflectivity and are not considered sources of intense or sustained glare. Building orientation and architectural design would further limit the potential for concentrated solar reflection by limiting the angles at which sunlight can reflect toward nearby roadways, properties, or sensitive receptors and by diffusing sunlight and preventing strong reflections. In addition, proposed landscaping, including street trees, perimeter vegetation, and open space buffers, would provide visual screening and reduce the potential for glare exposure in adjacent undeveloped areas.

Effects of Light and Glare on Biological Resources

In addition to the above effects, artificial nighttime lighting has the potential to affect biological resources, particularly wildlife species that rely on natural light cycles for behaviors such as foraging, movement, communication, breeding, and predatory avoidance. Increased nighttime illumination may also increase wildlife exposure to vehicle traffic and predation, especially along the edges of developed areas adjacent to open space or undeveloped lands. Wildlife species occurring in areas currently subject to low ambient lighting may be more sensitive to changes in nighttime light conditions.

Glare from sunlight reflecting off building materials, windows, vehicles, and other reflective surfaces also has the potential to affect biological resources, particularly wildlife species that rely on visual cues and natural light conditions for movement, foraging, predator avoidance, and communication. Sudden or intermittent glare may temporarily disorient wildlife, alter movement patterns, or increase vulnerability to predation, especially for species occurring along the margins of developed areas adjacent to open space or undeveloped lands.

Within MP Area 2, the greatest potential effects on biological resources would occur in areas adjacent to undeveloped lands to the north and east, which currently experience minimal nighttime lighting or

sources of glare. Although future development in MP Area 2 would not include high-intensity lighting features, such as stadium lighting, spotlights, or strobe lights, and would comply with Section 9.22.050 of the CMC, the CMC does not restrict the types of light sources that may be used or set limits for total light generation in areas of new development, so impacts would be potentially significant without additional project-specific controls. Therefore, future development within MP Area 2 would also be required to implement MM AES-4, which requires lighting that is designed to minimize spillover, glare, and unnecessary illumination into adjacent undeveloped areas, thereby reducing potential effects on biological resources. As a result, any glare experienced by biological resources would be limited, intermittent, and comparable to existing suburban conditions in the vicinity. Accordingly, impacts related to glare effects on biological resources would be less than significant.

Conclusion

Overall, the proposed Master Plan would increase nighttime lighting in MP Area 2; however, lighting would be typical of surrounding suburban development and would not include high-intensity features (e.g., stadium lighting, spotlights, or strobe lights) that could substantially increase sky glow or degrade nighttime views. Daytime glare would be limited because the proposed project would use typical non-reflective building materials and incorporate landscaping and site design features that reduce the potential for concentrated reflection. With implementation of MM AES-4, which requires lighting design measures to minimize spillover, glare, and unnecessary illumination into adjacent undeveloped areas, impacts related to light and glare would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Construction

Construction-related impacts may include light and glare from construction equipment and machinery and nighttime security lighting. Light and glare during the construction phase would be temporary and limited to the duration of construction and would therefore not cause any substantial impacts to daytime or nighttime views in the area. Pursuant to Section 5.27.604 of the CMC, construction activity shall only be permitted between the hours of 7:00 a.m. to 7:00 p.m., Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays, which would limit the amount of nighttime construction lighting and associated glare during sensitive evening and nighttime periods. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Construction activity during these hours typically occurs under ambient daylight conditions and would not require high-intensity lighting. Therefore, construction-related impacts associated with light and glare would be less than significant.

Operation

During operation, the Vista Ranch Development would introduce new sources of nighttime lighting and glare associated with residential uses, local roadways, pedestrian facilities, parks, and other neighborhood-serving amenities. Exterior lighting would include street lighting, residential building and yard lighting, landscape lighting, and mobile lighting from increased vehicular traffic. Overall, nighttime illumination within MP Area 1 would increase relative to existing rural conditions.

Effects on Nighttime Views (Light Spill and Sky Glow)

As described above, MP Area 1 is located within a largely developed area of Fresno County, and existing residential and roadway lighting already contributes to nighttime illumination and sky glow in the vicinity. Lighting introduced as part of development of MP Area 1 would be similar in type, scale, and intensity to lighting associated with adjacent suburban development and would not include high-intensity lighting features such as stadium lighting, spotlights, or strobe lights. As a result, operational lighting in MP Area 1 would not result in a substantial increase in sky glow or create unusual or excessively bright lighting conditions.

Exterior lighting associated with the Vista Ranch Development would be designed and installed in accordance with Section 9.22.050 (Exterior Light and Glare) of the CMC, which requires shielding and design measures to prevent light spill onto adjacent properties. Lighting plans, including fixture types, mounting heights, and photometrics, would be subject to City review and approval as part of improvement and building permits. Standard City street lighting would be pedestrian-scale and shielded to direct light toward the intended area of illumination and minimize glare and spillover, thereby reducing impacts related to light spillover into adjacent properties.

Effects of Glare (Daytime Reflection)

New sources of glare from the proposed project would occur primarily from the windshields of vehicles traveling to and from MP Area 1 and from vehicles parked within MP Area 1. Glare from traveling vehicles is a function of the density of vehicles on the roadway, the time that they are present, and the time of day. Generally, glare from traveling vehicles to a receptor is very short lived (fractions of a second) given that the glare is dependent on the amount of time in which the vehicle is positioned at the perfect angle for the sun to reflect light off the vehicle to a receptor. The potential for glare changes throughout the day as the angle of the sun changes. Furthermore, parking for the proposed residential uses in MP Area 1 would primarily occur within enclosed garages and driveways. Headlights and windshields would be shielded by the proposed residential structures within the site. There is always some potential for glare reflecting off traveling vehicles, but the City does not consider glare from vehicles traveling along roadways as a significant impact. Construction materials associated with the implementation of the proposed project would not include glare-inducing materials. Additionally, the proposed Vista Ranch Development includes plans for extensive landscaping and open space areas throughout MP Area 1, which would provide visual screening and block potential windshield glare for sensitive receptors around and within MP Area 1.

As discussed above, typical suburban residential materials with which the proposed residential and neighborhood-serving development would be constructed—including stucco, masonry, asphalt paving, and non-reflective roofing—exhibit low or diffuse reflectivity and are not considered sources of intense or sustained glare. Building orientation and architectural design would further limit the potential for concentrated solar reflection. In addition, proposed landscaping, including street trees, perimeter vegetation, and open space buffers, would provide visual screening and reduce the potential for glare exposure in adjacent undeveloped areas. The proposed Vista Ranch Development would also be required to comply with the performance standards related to lighting and glare outlined in the General Plan and Development Code, thereby reducing impacts related to glare.

Effects of Light and Glare on Biological Resources

As described above, light and glare have the potential to affect biological resources. Within MP Area 1, the greatest potential effects on biological resources would generally occur at the interface between developed areas and adjacent open or undeveloped lands. Although the Vista Ranch Development would comply with Section 9.22.050 of the CMC, the CMC does not restrict the types of light sources that may be used or set limits on total light generation from multiple sources within new development. As a result, impacts related to nighttime lighting and glare on biological resources would be potentially significant without additional project-specific controls.

Therefore, the Vista Ranch Development would be required to implement MM AES-4, which requires nighttime lighting to be designed to minimize spillover, glare, and unnecessary illumination into adjacent undeveloped areas and to reduce potential effects on biological resources.

Conclusion

Overall, operation of the Vista Ranch Development would increase nighttime lighting in MP Area 1; however, lighting would be typical of adjacent suburban development and would not include high-intensity features (e.g., stadium lighting, spotlights, or strobe lights) that could substantially increase sky glow or degrade nighttime views. Daytime glare would be limited because the project would use typical non-reflective building materials, incorporate landscaping and open space buffers, and because potential windshield glare from vehicles would be brief and intermittent. With implementation of MM AES-4, which requires lighting design measures to minimize spillover, glare, and unnecessary illumination into adjacent undeveloped areas, impacts related to light and glare would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM AES-4 Nighttime Lighting Standards

The following measures shall be required of all development in Master Plan (MP) Area 1 and MP Area 2 to avoid and reduce impacts of nighttime lighting and fugitive light/glare on wildlife. With prior written approval from the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS), equally protective measures may be substituted. Development applicants shall be responsible for implementing all measures; the City of Clovis (City) shall enforce measures as Conditions of Approval under the entitlements process.

- No lighting shall be installed in protected open space areas; lighting on parcels adjacent to open space—whether protected or not—shall be limited to the minimum needed for public safety;
- Public exterior lighting shall be equipped with full cut-off shielded luminaires to reduce light spill;
- Use of uplights on buildings shall be prohibited, and use of uplighting shall be limited to low-voltage, low-lumen-output uplighting on trees in public spaces and low-voltage lighting on entry signage;
- Exterior light fixtures in both public and private spaces shall be mounted as low as possible while still providing for safety and satisfying City code requirements; and
- Lighting sources shall be restricted to those that provide good color rendering such as light-emitting diodes (LEDs) and metal halide lamps; no use of high- or low-pressure sodium lamps or mercury vapor lamps shall be permitted.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The proposed project and cumulative projects could increase light and glare in the project vicinity. The Master Plan and cumulative development would include streetlights, exterior lighting, safety lighting, lighting from vehicles, and reflected light/glare from buildings and vehicles. Cumulative light and glare impacts would be less than significant because the future development would be subject to applicable regulations related to light and glare.

Future development associated with the Master Plan would be required to comply with existing City regulations aimed at reducing light and glare impacts to ensure that no unusual daytime glare or nighttime lighting is produced. Specifically, the Clovis Development Code states that direct glare shall not be permitted and provides shielding requirements and standards for nuisance prevention. Section 9.22.050 of the Clovis Development Code contains standards and provisions related to exterior lighting. To enforce these requirements, the City's development review process requires a lighting plan to be submitted to the City for review and approval. Additionally, individual cumulative projects would also undergo their own discretionary review, as applicable, and would incorporate project-specific lighting controls or mitigation measures similar to those included as part of the proposed project. These measures ensure that each project avoids creating excessive light and glare beyond the City's thresholds. Because cumulative development is occurring in accordance with these

adopted plans and policies, which contemplate and regulate urban lighting as part of the City's planned buildout, the combined effects of existing and future development on light and glare would not result in a cumulatively significant impact.

Overall, the proposed Master Plan would introduce new sources of daytime and nighttime lighting within MP Area 2 that do not currently exist. However, it is noted there are no specific features within the proposed project that would create unusual light and glare. Light sources from the proposed project can have an adverse impact on the surrounding areas by introducing nuisance light into the area and decreasing the visibility of nighttime skies. Additionally, light sources can create light spillover impacts on surrounding land uses in the absence of a lighting plan that includes photometrics of the lighting.

Any new lighting associated with the development of the proposed project would be pedestrian-scale lighting and the fixtures would be consistent with the style and technical specifications approved by the City, including compliance with the City's light and glare regulations under Section 9.22.050 of the Clovis Development Code, which requires that light be shielded so that light does not spill onto adjacent properties. The City's existing requirements require a lighting plan to be submitted to the City for review and approval for the improvement plans, as well as for the building plans. All proposed outdoor lighting is required to meet applicable City standards regulating outdoor lighting, including Section 9.22.050, Exterior light and glare, of the City's Development Code, to minimize any impacts resulting from outdoor lighting on adjacent properties. Implementation of the existing City standards would reduce potential impacts associated with nighttime lighting and light spillage onto adjacent properties to a less than significant level. Furthermore, future development within MP Area 2 would be required to implement MM AES-4, which would reduce potential impacts, as described above. Therefore, the proposed Master Plan's incremental contribution to the less than significant cumulative impact would not be cumulatively considerable. Cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development and cumulative projects could increase light and glare in the project vicinity. The Vista Ranch Development and cumulative development would include streetlights, exterior lighting, safety lighting, lighting from vehicles, and sources of glare from buildings and vehicles. Cumulative light and glare impacts would be less than significant because the future development would be subject to applicable regulations related to light and glare. Additionally, individual cumulative projects would also undergo their own discretionary review, as applicable, and would incorporate project-specific lighting controls or mitigation measures similar to those included as part of the proposed project. These measures ensure that each project avoids creating excessive light and glare beyond the City's thresholds.

Similar to future development within MP Area 2, the proposed Vista Ranch Development would be required to implement existing City regulations aimed at reducing light and glare impacts to ensure that no unusual daytime glare or nighttime lighting is produced, including the Clovis Development Code. The proposed Vista Ranch Development would introduce new sources of daytime and nighttime lighting within MP Area 1 that do not currently exist. However, it is noted there are no specific features within the proposed Vista Ranch Development that would create unusual light and

glare. Light sources from the proposed project can have an adverse impact on the surrounding areas, by introducing nuisance light into the area and decreasing the visibility of nighttime skies. Additionally, light sources can create light spillover impacts on surrounding land uses in the absence of a lighting plan that includes photometrics of the lighting.

Any new lighting associated with the development of the proposed project would be pedestrian-scale lighting and the fixtures would be consistent with the style and technical specifications approved by the City, including compliance with the City's light and glare regulations under Section 9.22.050 of the Clovis Development Code, which requires that light be shielded so that light does not spill onto adjacent properties. Furthermore, the Vista Ranch Development would be required to implement MM AES-4, which would reduce potential impacts, as described above. Implementation of the existing City standards and MM AES-4 would reduce potential impacts associated with nighttime lighting and light spillage onto adjacent properties to a less than significant level. Therefore, the proposed Vista Ranch Development's incremental contribution to the less than significant cumulative impact would not be cumulatively considerable. Cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.2 - Agriculture and Forestry Resources

3.2.1 - Introduction

This section describes the existing agricultural conditions in the project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to agriculture that could result from the implementation of the proposed project. Descriptions and analysis in this section are based, in part, upon existing site conditions, the County's Agricultural Commissioner's most recent published Agricultural Report (2023), the City of Clovis General Plan (General Plan) and General Plan and Development Code Update Environmental Impact Report (General Plan EIR), as well as aerial photographs and topographical maps.

No public comments were received during the Revised Draft EIR Notice of Preparation (NOP) scoping period related to Agricultural Resources and Forestry Resources.

3.2.2 - Environmental Setting

Agricultural Resources

The Sphere of Influence (SOI) Expansion Area is located within a flat to gently sloping terrain situated at an elevational range of approximately 390 to 416 feet above mean sea level (AMSL) in the agriculturally rich San Joaquin Valley. The SOI Expansion Area includes a mix of undeveloped land consisting of annual grassland, fallow farmland, or pasture, and developed or disturbed areas that consist of rural residences, farm buildings, abandoned poultry pens, and abandoned nursery operations. The off-site infrastructure portions of the SOI Expansion Area are located along developed roads fronting rural residential development on East Behymer Avenue, East Perrin Avenue, East Shepherd Avenue, and North Fowler Avenue. The SOI Expansion Area is surrounded by single-family residential, rural residential, a few agricultural orchards, grazing land, and open space land uses. Uses immediately west and north of the SOI Expansion Area are primarily rural residential on larger lots and fallow or grazing properties.

Within the SOI Expansion Area, the Master Plan Area, including the MP Area 1, primarily serves as vacant grazing land while the Non-development Area is primarily rural residential land. Buried structures may be present in the Master Plan Area, including utility lines, irrigation lines, drainage lines, septic systems and possible water wells. Each individual property within the Master Plan Area would require the appropriate decommissioning of the existing underground utilities prior to development. This would include the abandonment of existing wells in accordance with a permit issued by Fresno County (County). The Master Plan Area is not irrigated for crop production. The Master Plan Area is best characterized as grazing and fallow land.

Farmland Classifications

The Farmland Mapping and Monitoring Program (FMMP) is a farmland classification system administered by the California Department of Conservation. Important farmland maps are based on

the Land Inventory and Monitoring criteria, which classify a land's suitability for agricultural production based on both the physical and chemical characteristics of soils and the actual land use. The system maps five categories of agricultural land, which include important farmlands (Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance) and grazing land, as well as categories of nonagricultural land, which include Urban and Built Up Land, Rural Residential Land, Other Land, and Water Area.

County of Fresno

Data from the Department of Conservation indicates that approximately 1,858 acres of Prime Farmland in the County were developed for other uses between 2016 and 2018, resulting in a current existing total of approximately 381,934 acres of Prime Farmland (42 percent of agricultural land).[1,2] The remaining agricultural land is comprised of Farmland of Statewide Importance (9 percent), Unique Farmland (9 percent), Farmland of Local Importance (7 percent), and Grazing Land (14 percent). The types and acreages of farmland in 2016 and 2018 are shown in Table 3.2-1.

Table 3.2-1: Fresno County Farmland Summary and Change by Land Use Category

Land Use Category	2016-2018 Acreage Changes							
	Total Acreage Inventoried				Acres Lost	Acres Gained	Total Acreage Changed	Net Acreage changed
	2016		2018					
	Acres	Percent	Acres	Percent	(-)	(+)		
Prime Farmland	675,720	28%	672,208	28%	7,237	3,725	10,962	-3,512
Farmland of Statewide Importance	397,133	16%	395,148	16%	3,945	1,960	5,905	-1,985
Unique Farmland	94,902	4%	95,352	4%	809	1,259	2,068	450
Farmland of Local Importance	191,783	8%	192,434	8%	9,946	10,597	20,543	651
Important Farmland Subtotal	**1,359,538**	**56%**	**1,355,142**	**56%**	**21,937**	**17,541**	**39,478**	**-4,396**
Grazing Land	822,696	34%	822,455	34%	718	477	1,195	-241
Agricultural Land Subtotal	**2,182,234**	**90%**	**2,177,597**	**89%**	**22,655**	**18,018**	**40,673**	**-4,637**

[1] Note: The 2016 to 2018 Conversion Report is the latest conversion report published by the California Department of Conservation. April 2025.

[2] California Department of Conservation. 2016. 2016–2018 Farmland Conservation Report. Website: https://www.conservation.ca.gov/dlrp/fmmp/Pages/2016-2018_Farmland_Conversion_Report.aspx. Accessed April 2, 2025.

Land Use Category	2016-2018 Acreage Changes							
	Total Acreage Inventoried				Acres Lost	Acres Gained	Total Acreage Changed	Net Acreage changed
	2016		2018					
	Acres	Percent	Acres	Percent	(-)	(+)		
Urban and Built-up Land	128,910	5%	132,868	5%	685	4,643	5,328	3,958
Other Land	121,445	5%	121,847	5%	1,745	2,211	3,956	466
Water Area	4,908	<1%	5,121	<1%	64	277	341	213
Total Area Inventoried	**2,437,497**	**100%**	**2,437,433**	**100%**	**25,149**	**25,149**	**50,248**	**0**

Notes:
All values are approximate.
Source: California Department of Conservation. Division of Land Resource Protection. Table A-30. 2018.

City of Clovis

There are currently 10,199 acres designated Agriculture within the Clovis Planning Area. Of this total, 389 acres are within the SOI and 9,810 acres are outside the City's SOI. Relative to total land area, 7 percent of the SOI and 36 percent of the Planning Area outside the SOI are designated for agricultural use. No lands within the City have an Agriculture land use designation.[3]

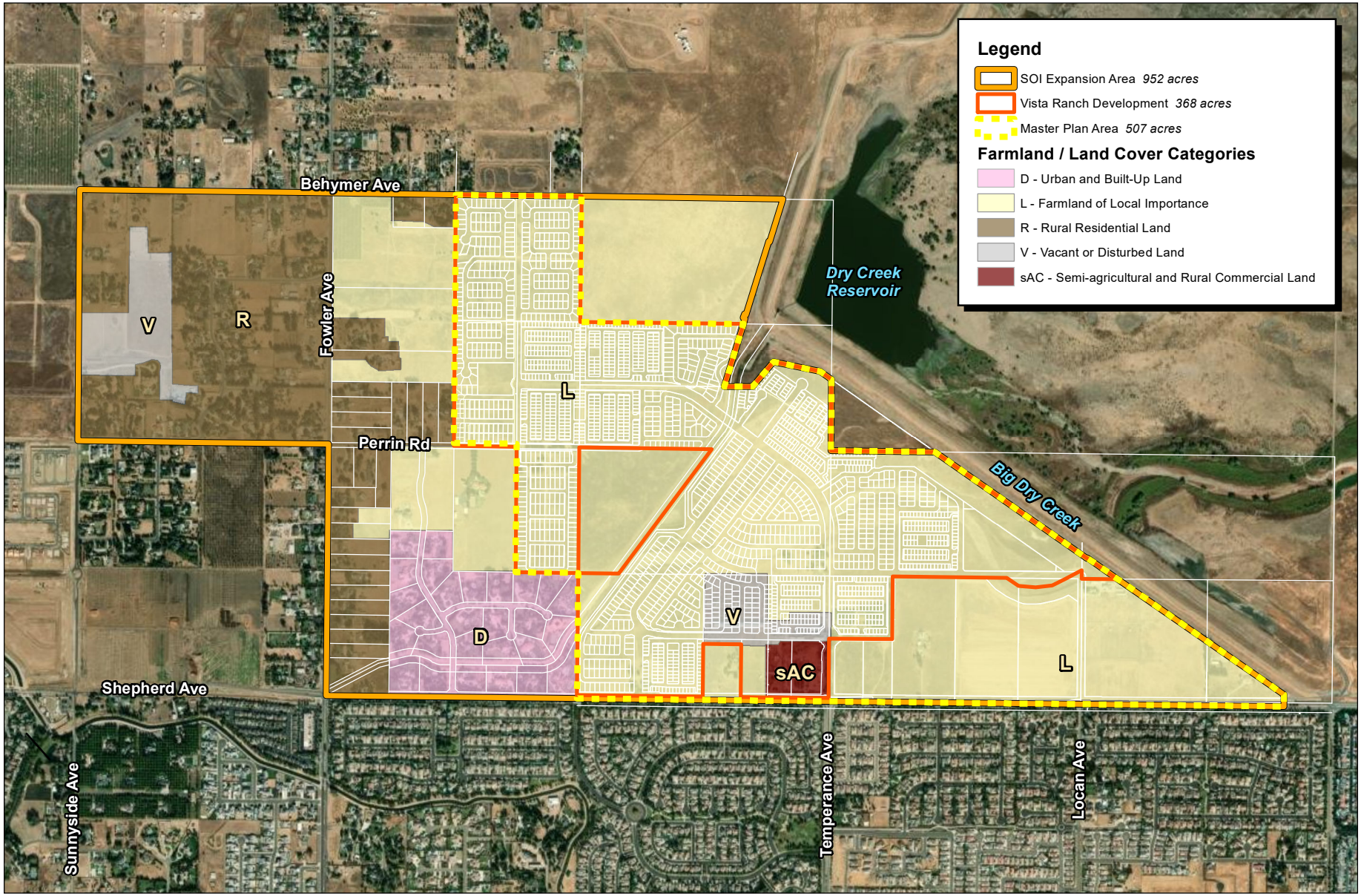
SOI Expansion Area

The FMMP and Fresno County Geographic Information System (GIS) data were used to illustrate the farmland designations for the SOI Expansion Area. The last mapping date in the County was in 2022. Farmlands on the SOI Expansion Area are identified in Exhibit 3.2-1. The farmland classifications for the SOI Expansion Area and surrounding area are described below in Table 3.2-2.[4]

[3] City of Clovis. 2013. General Plan and Development Code Update Draft Program Environmental Impact Report, 5.2 Agriculture and Forestry Resources. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-02-Agriculture-and-Forestry-Resources.pdf Accessed February 13, 2025.

[4] It is important to note that the California Department of Conservation notes on the map that "This map should be used within the limits of its purpose–as a current inventory of agricultural land resources. This map does not necessarily reflect general plan or zoning designations, city limit lines, changing economic or market conditions, or other factors which may be taken into consideration when land use policies are determined. This map is not designed for parcel-specific planning purposes due to its scale and the ten-acre minimum land use mapping unit. Classification of important farmland and urban areas on this map is based on best available data. The information has been delineated as accurately as possible at 1:24,000-scale, but no claim to meet 1:24,000 National Map Accuracy Standards is made due to variations in the quality of source data."

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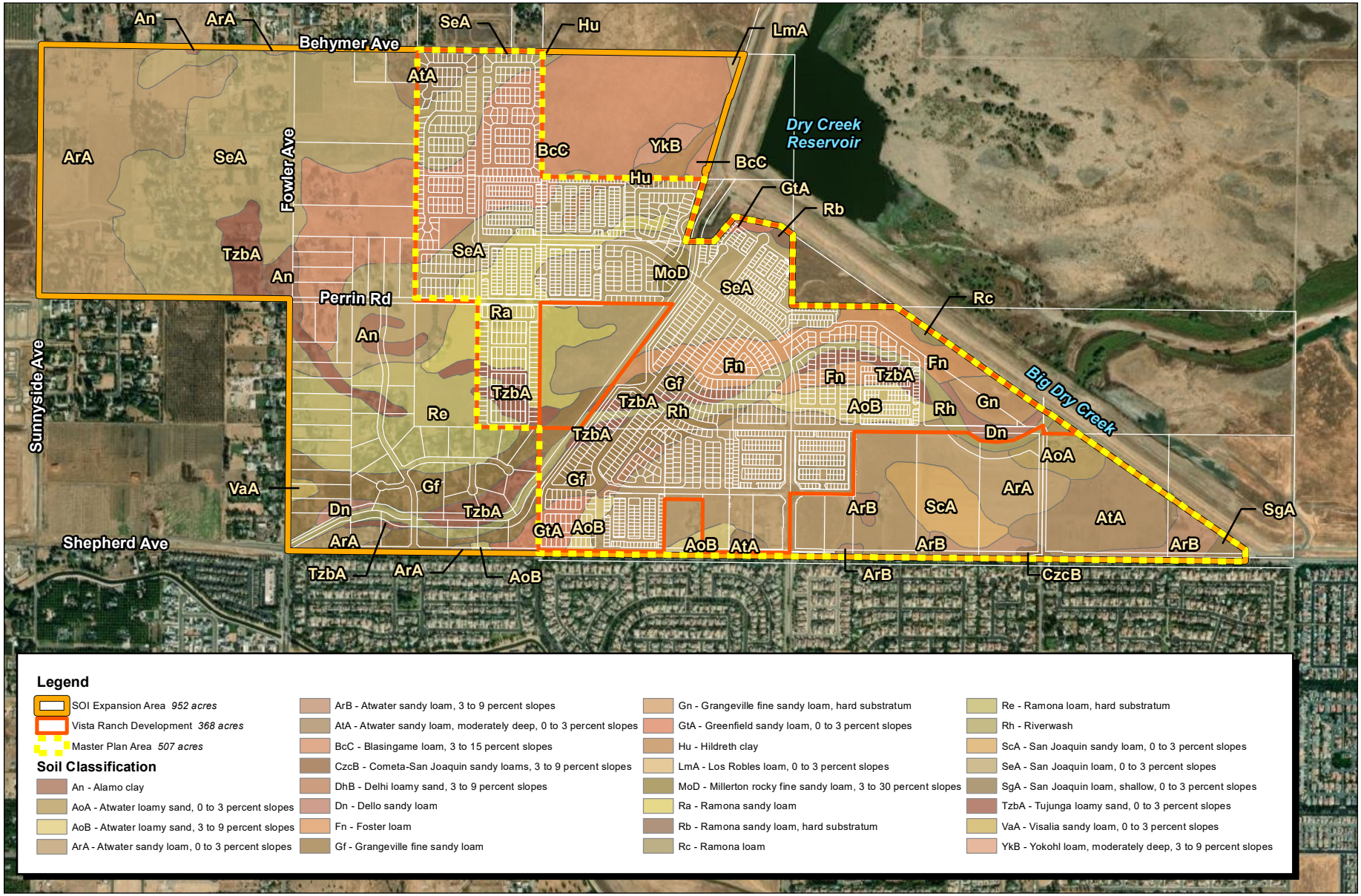


Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. California Department of Conservation.

1,500 750 0 1,500 Feet

Exhibit 3.2-1
Important Farmland Map

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Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. USDA Soils Data, Fresno Eastern.

1,500 750 0 1,500 Feet

Exhibit 3.2-2
Soils Map

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Table 3.2-2: Important Farmland

Farmland Types	Non-development Area	MP Area 1	MP Area 2	Right-of-way	Grand Total
Urban and Built-up Land	66.92	0.00	0.00	1.90	**68.82**
Farmland of Local Importance	143.35	338.10	138.14	2.83	**622.42**
Rural Residential Land	210.90	0.00	0.00	0.00	**210.90**
Semi-agricultural and Rural Commercial Land	0.00	8.45	0.05	0.85	**9.35**
Vacant or Disturbed Land	24.49	15.50	0.52	0.00	**40.51**
Grand Total	**445.66**	**362.05**	**138.71**	**5.58**	***952.01***

Notes:
All values are represented in approximate acreage.
Source: National Resource Conservation Service (NRCS) Web Soil Survey. 2019.

There are approximately 8.5 acres of “Semi-agricultural and Rural Commercial Land” in the Master Plan Area, 16.02 acres of “Vacant or Disturbed Land” in the Master Plan Area, and 24.49 acres of “Vacant or Disturbed Land” in the Non-development Area.

Soil Classification

The FMMP also identifies lands that have agriculture value and maintains a statewide map of these lands called the Important Farmlands Inventory (IFI). IFI classifies land based upon the productive capabilities of the land, rather than the mere presence of ideal soil conditions. The suitability of soils for agricultural use is just one factor in determining the productive capabilities of land. Suitability is determined based on many characteristics, including fertility, slope, texture, drainage, depth, and salt content. A variety of classification systems have been devised by the State to categorize soil capabilities. The two most widely used systems are the Capability Classification System and the Storie Index. The Capability Classification System classifies soils from Class I to Class VIII based on their ability to support agriculture with Class I being the highest quality soil. The Storie Index considers other factors such as slope and texture to arrive at a rating. The IFI is, in part, based upon both of these two classification systems.

Capability Classification System

As discussed above, the Soil Capability Classification System takes into consideration soil limitations, the risk of damage when soils are used, and the way in which soils respond to treatment. Capability classes range from Class I soils, which have few limitations for agriculture, to Class VIII soils that are unsuitable for agriculture. Generally, as the rating of the capability classification increases, yields and profits are more difficult to obtain. A general description of soil classifications, as defined by the National Resource Conservation Service (NRCS) is provided in Table 3.2-3 below.

Table 3.2-3: Soil Capability Classification

Class	Definition
I	Soils have slight limitations that restrict their use.
II	Soils have moderate limitations that restrict the choice of plants or that require moderate conservation practices.
III	Soils have severe limitations that restrict the choice of plants or that require special conservation practices, or both.
IV	Soils have very severe limitations that restrict the choice of plants or that require very careful management, or both.
V	Soils are not likely to erode, but have other limitations; impractical to remove that limits their use largely to pasture or range, woodland, or wildlife habitat.
VI	Soils have severe limitations that make them generally unsuited to cultivation and limit their use largely to pasture or range, woodland, or wildlife habitat.
VII	Soils have very severe limitations that make them unsuited to cultivation and that restrict their use largely to pasture or range, woodland, or wildlife habitat.
VIII	Soils and landforms have limitations that preclude their use for commercial plans and restrict their use to recreation, wildlife habitat, water supply, or aesthetic purposes.

Source: United States Department of Agriculture (USDA) Soil Conservation Service.

The Storie Index

The Storie Index rating system ranks soil characteristics according to their suitability for agriculture from Grade 1 soils (80 to 100 rating) which have few or no limitations for agricultural production, to Grade 6 soils (less than 10) which are not suitable for agriculture. Under this system, soils deemed less than prime can function as prime soils when limitations such as poor drainage, slopes, or soil nutrient deficiencies are partially or entirely removed. The six grades, ranges in index rating, and definition of the grades, as defined by the NRCS, are provided below in Table 3.2-4.

Table 3.2-4: Storie Index Rating System

Grade	Index Rating	Definition
1	80–100	Few limitations that restrict their use for crops
2	60–80	Suitable for most crops but have minor limitations that narrow the choice of crops and have a few special management needs
3	40–60	Suited to a few crops or to special crops and require special management
4	20–0	If used for crops, severely limited and require special management
5	10–20	Not suited for cultivated crops, but can be used for pasture and range
6	Less than 10	Soil and land types generally not suited to farming

Source: National Resource Conservation Service (NRCS) Web Soil Survey. 2019.

In addition to soil suitability, other factors for determining the agricultural value of land include whether soils are irrigated, the depth of soil, water-holding capacity, and physical and chemical characteristics. Areas considered to have the greatest agricultural potential are designated as Prime Farmland or Farmland of Statewide Importance.

SOI Expansion Area

A Custom Soil Survey was completed for the SOI Expansion Area using the NRCS Web Soil Survey program. Table 3.2-5 identifies the soils found in the Master Plan Area. The NRCS Soils Map is provided on Exhibit 3.2-2.

Table 3.2-5: SOI Expansion Area Soil Survey

Map Unit Symbol	Name	Acres in Master Plan Area	Percent of Master Plan Area	Capability Classification	Storie Index
AoA	Alamo Clay	8.63	1.70%	4s	70
AoB	Atwater loamy sand, 0 to 3 percent slopes, MLRA 17	19.58	3.86%	4e	65
ArA	Atwater loamy sand, 3 to 9 percent slopes	107.95	21.31%	4s	88
ArB	Atwater sandy loam, 0 to 3 percent slopes	12.09	2.39%	4e	65
AtA	Atwater sandy loam, 3 to 9 percent slopes	32.64	6.44	4s	65
BcC	Atwater sandy loam, moderately deep, 0 to 3 percent slopes	34.87	6.88%	3e	51
CzcB	Blasingame loam, 3 to 15 percent slopes	0.67	0.13%	4e	51
DhB	Cometa-San Joaquin sandy loams, 3 to 9 percent slopes	2.62	0.52%	4e	68
Dn	Delhi loamy sand, 3 to 9 percent slopes	3.70	0.73%	4w	80
Fn	Dello sandy loam	34.57	6.82%	4s	90
Gf	Foster Loam	25.47	5.03%	4w	80
Gn	Grangeville fine sandy loam, 0 to 1 percent slopes, MLRA 17	7.20	1.42%	4s	63
GtA	Grangeville fine sandy loam, hard substratum	5.90	1.17%	4c	90
Hu	Greenfield sandy loam, 0 to 3 percent slopes	3.04	0.60%	3w	36

Map Unit Symbol	Name	Acres in Master Plan Area	Percent of Master Plan Area	Capability Classification	Storie Index
MoD	Hildreth Clay	3.04	0.55%	7e	16
Ra	Los Robles loam, 0 to 3 percent slopes	35.86	7.08%	4c	77
Rb	Millerton rocky fine sandy loam, 3 to 30 percent slopes	0.75	0.15%	4s	62
Rc	Ramona loam	1.03	0.20%	4c	85
Re	Ramona loam, hard substratum	2.90	0.57%	4s	65
Rh	Ramona sandy loam	18.57	3.67%	N/A	5
ScA	Ramona sandy loam, hard substratum	14.60	2.88%	4s	24
SeA	Riverwash	113.00	22.30%	4s	33
SgA	San Joaquin loam, 0 to 3 percent slopes	1.40	0.28%	4s	24
TzbA	San Joaquin loam, shallow, 0 to 3 percent slopes	16.86	3.33%	4s	76

Notes:
All values are approximate.
Source: Fresno County GIS. National Resource Conservation Service (NRCS) Soils Database. 2024.

Forestry Resources

County of Fresno

Approximately 84 percent of the land in the Fresno County Planning Area is owned by the federal government in the form of national parks and forests. Fresno County contains portions of two national forests: Sierra National Forest, which makes up much of the eastern portion of the County north of the Kings River, and Sequoia National Forest, which makes up a small portion of the County south of the Kings River. National forests are managed by the National Park Service, which is part of the USDA. These include the Sierra and Sequoia National Forests and Kings Canyon National Park. The Sequoia National Forest covers approximately 1,173,200 acres, with 12 percent, or 140,784 acres of the forest located in the southeastern portion of the County.[5]

[5] County of Fresno. 2023. Fresno County General Plan Review and Zoning Ordinance Update Program Environmental Impact Report. April. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/public-works-and-planning/development-services/planning-and-land-use/general-plan/1_draft-program-environmen-1.pdf. Accessed October 14, 2025.

City of Clovis

There is no land in the City, in the existing SOI, or in the non-SOI Plan Area that is zoned as forest land or timberland. That said, there are relatively small areas of riparian forest along Dry Creek, Dog Creek, and Redbank Slough. Dry Creek traverses the City, SOI, and non-SOI Plan Area; Dog Creek traverses the SOI and non-SOI Plan Area; and Redbank Slough traverses the non-SOI Plan Area.[6]

SOI Expansion Area

The SOI Expansion Area does not contain any land that is zoned or designated as forest or timberland. The nearest riparian forest is along Dry Creek, approximately 1.23 mile southwest of the SOI Expansion Area.

3.2.3 - Regulatory Framework

Federal

Farmland Protection Policy Act

The Farmland Protection and Policy Act (FPPA) was designed to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The FPPA assures that, to the extent possible, federal programs are administered to be compatible with State, local units of government, and private programs and policies to protect farmland. Federal agencies are required to develop and review their policies and procedures to implement the FPPA every 2 years. The FPPA does not authorize the federal government to regulate the use of private or nonfederal land or, in any way, affect the property rights of owners. For the purposes of the FPPA, "farmland" includes Prime Farmland, Unique Farmland, and Farmland of Statewide or Local Importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forest land, pastureland, cropland, or other land, but not water or urban/built-up land.

State

Farmland Mapping and Monitoring Program

The Department of Conservation established the FMMP in 1982. The FMMP is a non-regulatory program that provides a consistent and impartial analysis of agricultural land use and land use changes throughout California. The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. The maps are updated every 2 years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance. Important farmland maps are based on the Land Inventory and Monitoring criteria, which classify a land's suitability for agricultural production based on both the physical and chemical characteristics of soils and the actual land use. The description of various farmland classifications are described below:

[6] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. 5.2 Agriculture and Forestry Resources. June. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-02-Agriculture-and-Forestry-Resources.pdf?t=202507181312560. Accessed February 13, 2025.

Prime Farmland

Prime Farmland is farmland with the best combination of physical and chemical features to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. This category is not located within the SOI Expansion Area.

Farmland of Statewide Importance

Farmland of Statewide Importance is farmland with characteristics similar to those of Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date. This category is not located within the SOI Expansion Area.

Unique Farmland

Unique Farmland is farmland of lesser quality soils used for the production of the California's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date. This category is not located within the SOI Expansion Area.

Farmland of Local Importance

Farmland of Local Importance is land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee. Approximately 476.24 acres of Farmland of Local Importance is in the Master Plan Area, with 143.35 acres in the Non-development Area.

Urban and Built-Up Land

Urban and Built-up Land is land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. This category is not located within the Master Plan Area. Approximately 66.92 acres are in the Non-development Area.

Rural Residential Land

Rural Residential Land has a building density of less than one structure per 1.5 acres but with at least one structure per 10 acres. This category is not located within the Master Plan Area. Approximately 210.9 acres are in the Non-development Area.

Other Land

Other Land is not included in any other mapping category. Common examples include brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is

mapped as Other Land. This category also includes Rural Land, which includes: Semi-agricultural and Rural Commercial Land, Vacant or Disturbed Land, Confined Animal Agriculture, and Nonagricultural or Natural Vegetation.

For purposes of determining a proposed project's significance under the California Environmental Quality Act (CEQA), only Prime Farmland, Unique Farmland, and Farmland of Statewide Importance are used to determine impacts. Conversion to nonagricultural uses of lands falling under any of these classifications is considered a potentially significant impact under CEQA Guidelines.

California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, commonly known as the Williamson Act, was established based on numerous State legislative findings regarding the importance of agricultural lands in an urbanizing society. Policies emanating from those findings include those that discourage premature and unnecessary conversion of agricultural land to urban uses and discourage discontinuous urban development patterns, which unnecessarily increase the costs of community services to community residents.

The Williamson Act authorizes each County to establish an agricultural preserve. Land within the agricultural preserve is eligible to be placed under a contract between the property owner and County that would restrict the use of the land to agriculture in exchange for a tax assessment that is based on the yearly production yield. The contracts have a 10-year term that is automatically renewed each year, unless the property owner requests a non-renewal or the contract is cancelled. If the contract is cancelled, the property owner is assessed a fee of up to 12.5 percent of the property value.

California Government Code Section 56064

This section of the Government Codes defines "Prime agricultural land" as follows:

- Prime agricultural land means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:
  - Land that qualifies, if irrigated, for rating as Class I or Class II in the USDA Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.
  - Land that qualifies for rating 80 through 100 Storie Index Rating.
  - Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the United States Department of Agriculture in the National Range and Pasture Handbook, Revision 1, December 2003.
  - Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and that will re-turn during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than four hundred dollars ($400) per acre.

- Land that has returned from the production of unprocessed agricultural plant products on an annual gross value of not less than four hundred dollars ($400) per acre for three of the previous five calendar years.

Local

Local Agency Formation Commission Boundary Controls

The Fresno Local Agency Formation Commission (LAFCo) is responsible for coordinating orderly amendments to local jurisdictional boundaries, including annexations. Annexation of the Master Plan into the City of Clovis would be subject to LAFCo approval, and LAFCo's decision is governed by State law (Government Code § 56001, *et seq.*) and the local LAFCo Policies and Procedures. State law requires LAFCo to consider agricultural land and open space preservation in all decisions related to expansion of urban development. LAFCo's definition of Prime Agriculture land refers to California Government Code Section 56064, which is described above.

City of Clovis General Plan

The General Plan includes several policies relevant to agricultural resources. Policies applicable to the proposed project are identified below:

Land Use Element

Policy 4.4 **Farmland Conservation**. Participate in regional farmland conservation, including the establishment of comprehensive agricultural preserves or easements, through efforts such as the Fresno County Model Farmland Conservation Program or the San Joaquin Valley Greenprint.

Policy 6.2 **Smart growth.** The city is committed to the following smart growth goals.

- Create a range of housing opportunities and choices;
- Create walkable neighborhoods;
- Encourage community and stakeholder collaboration;
- Foster distinctive, attractive communities with a strong sense of place;
- Make development decisions predictable, fair, and cost-effective;
- Mix land uses;
- Preserve open space, farmland, natural beauty, and critical environmental areas;
- Provide a variety of transportation choices;
- Strengthen and direct development toward existing communities;
- Take advantage of compact building design;
- Enhance the economic vitality of the region;
- Support actions that encourage environmental resource management.

Open Space and Conservation Element

Policy 2.2 **New development.** Encourage new development to incorporate on-site natural resources and low impact development techniques.

Policy 2.4 **Agricultural lands.** Preserve the city's agricultural legacy through the Agricultural land use designation, memorialize agricultural history and culture, and facilitate thoughtful conversion of lands to development.

Policy 2.5 **Right to farm.** Support, encourage, and protect agricultural operations within Clovis and recognize their right to farm.

City of Clovis General Plan EIR

The General Plan EIR includes three Mitigation Measures (MMs) relevant to agricultural resources. The mitigation measure applicable to the proposed project is identified below:

MM 2-3 Pending adoption of a regional agricultural preservation program or local [Farmland Preservation Program (FPP)], or if a regional agricultural preservation program or local [FPP] is not in place by June 25, 2017, the following requirements shall apply:

(1) Project applicants for properties that include more than 20 acres designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland shall be prepare or fund an agricultural resource evaluation prior to project approval.
(2) The resource evaluation shall use generally accepted methodologies (such as the Land Evaluation and Site Assessment Model) to identify the potentially significant impact of the loss of agricultural land.
(3) If the loss of agricultural land is determined to be a potentially significant impact, the resource evaluation shall consider the economic viability of future agricultural use of the property.
(4) If the agricultural resource is considered significant (based on LESA or other accepted methodology) and future agricultural use is considered economically viable, the conversion will be deemed significant. The City shall require mitigation by one of the following methods:
    (a) Mitigation at a 1:1 ratio of converted to preserved acreage through a regional conservation easement, or payment of its valuation equivalent if a fee mitigation program is established. If 1:1 mitigation is deemed to be economically infeasible, based upon all of the evidence, the ratio may be reduced to an economically feasible ratio or no further mitigation shall be required. This determination shall be made by the City's Director of Planning and Development services based upon substantial evidence in the record; or
    (b) Other potential mitigation which achieves the same mitigating effect as the measures identified above, consistent with the CEQA Statutes and Guidelines. This determination shall be made by the City's Director of Planning and Development Services based upon substantial evidence in the record.

    One possible substitute mitigation measure to achieve the preservation of agricultural land is through the use of benchmark densities that are designed to increase development efficiency. When development equals or exceeds

the benchmark densities, no further mitigation is required because the community has taken steps to preserve agricultural land by increasing densities beyond a certain threshold thereby accommodating growth trends on less land. When development does not equal or exceed the benchmark densities, a sliding scale of mitigation fees are paid.

The General Plan contains many efficiency policies and land use designations to aid in the preservation of agricultural land, which are based upon the San Joaquin Valley Blueprint and Landscape of Choice principles. See, for example: Land Use Element Goal 3 (orderly and sustainable outward growth into three Urban Centers); Land Use Element Goal 4, Policy 3.8 (land use compatibility); Land Use Element Goal 4, Policy 3.9 (connected development; Land Use Element Goal 4, Policy 4.4 (farmland conservation); Land Use Element Goal 5 (diverse housing and transit oriented development); Land Use Goal 6, Policy 6.2 (smart growth); Land Use Element, Table LU-2 (land use designations); Economic Development Element, Goal 1, Policy 1.2 (jobs-housing ratio); Economic Development Element, Goal 5 (mix of land uses and types of development); Circulation Element, Goal 1, Policy 1.8 (network completion); Circulation Element, Goals 3 and 4, multimodal transportation, bicycle and transit system); Open Space and Conservation Element Goal 2, Policies 2.4 and 2.5 (agricultural lands and right to farm); Air Quality Element, Goal 1, Policy 1.1 (land use and transportation); 2010 Housing Element, Regional Housing Needs Assessment (RHNA) requirements; Fresno COG Sustainable Communities Strategy. These efficiency policies and land use designations are designed to prevent the premature conversion of farmland by encouraging infill development, by requiring new development to be built at considerably higher densities than Clovis or the region has traditionally seen, by requiring that development occur in a compact, orderly manner, and by providing for balanced development, including substantial emphasis on increasing the jobs-housing ratio.

To the extent benchmark densities are adopted for Clovis or the region, and to the extent the City's General Plan policies and land use designations are consistent with those benchmark densities, mitigation may be met through implementation of the General Plan and application of the benchmark densities.

(5) The following properties are determined to be not economically viable for future agricultural use, based upon all of the evidence in the record. Other properties shall be evaluated on a case by case basis:

All properties within the Loma Vista Specific Plan ("Loma Vista").

- Properties within Loma Vista were designated for urban development under the 1993 General Plan and the 2003 Loma Vista Specific Plan (formerly called the Southeast Urban Center Specific Plan).
- The Loma Vista Specific Plan EIR, page 5-34, makes the following observations:
  "The project area is located adjacent to the incorporated Clovis City, within the updated 2000 sphere-of-influence limits, thereby supporting concentrated growth pattern adjacent to the existing urban development. The proposed Specific Plan would guide the conversion of the existing agricultural and rural lands to planned urban uses in a gradual, phased, and orderly manner, therefore alleviating development pressure off of outlying unincorporated lands."
- Substantial development has occurred in Loma Vista since 2003.
- The City, property owners and the development community have relied upon this urbanization in planning for and developing Loma Vista
- The 2000 County General Plan, Land Use Policy LU-G, provides that the County will direct urban growth and development within city spheres of influences to existing incorporated cities, and this is policy memorialized in the City's Memorandum of Understanding with the County, as amended in 2000 (commonly referred to as the Tax Sharing MOU).
- The Tax Sharing MOU addresses Loma Vista and recognizes this area as becoming substantially urbanized. In fact, before development could proceed outside of Loma Vista, 60% of the developable area in Loma Vista has to be committed to development.
- In 2008, the City adopted a master plan community zone district for the Loma Vista Community Centers North and South and approved a master site plan for those sites. Projects adjacent to and within the Community Centers have been approved or are pending.
- The development community has nine pending project applications for development within Loma Vista.

City of Clovis Right to Farm Ordinance

Section 9.40.170 of the City of Clovis Municipal Code (CMC) establishes the City's "Right to Farm" ordinance, which is intended to provide the City's policy regarding the "right to farm" and contains a subdivider's and owner's disclosure statement, which acknowledges the subdivider's and owner's understanding of the presence of the adjoining agricultural use and the City's policy regarding its right to continue. The ordinance establishes the City's policy to agricultural land consistent with the California Civil Code Section 3482.5 as follows:

A. Policy of the City.
   1. It is the declared policy of the City of Clovis to preserve, protect, and encourage development of its agricultural land consistent with the California Civil Code Section 3482.5, which provides that no agricultural activity, operation, or facility, or appurtenances

thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than three (3) years if it was not a nuisance at the time it began.

2. This policy applies to normally acceptable agricultural operations, as defined in the California Civil Code Section 3482.5, and shall not apply if the agricultural activity, operation, facility, or appurtenances thereof obstruct the free passage or use, in the customary manner, of any public park, square, street, or highway.
3. This policy shall not invalidate any provision contained in the Fish and Game Code, Food and Agricultural Code, Health and Safety Code, or Water Code Division 7 (commencing with Section 13000), if the agricultural activity, operation, facility, or appurtenances thereof constitute a nuisance, public or private, as specifically defined or described in any of those provisions.

B. Covenant.

1. If a subdivision is at any point within three hundred feet (300') of land zoned for agricultural uses, the approval of the tentative and final subdivision map or parcel map shall be conditional upon the recordation with the County Recorder of a right-to-farm covenant acknowledging, accepting and complying with this section, in substantially the following wording or similar form:

   "The undersigned in consideration of recordation of said subdivision by the City of Clovis, do hereby covenant and agree with the declared policy of the City of Clovis (Right-to-Farm Ordinance) to preserve, protect, and encourage development of its agricultural land consistent with the California Civil Code Section 3482.5, which provides that no agricultural activity, operation, or facility, or appurtenances thereof, as defined in the code, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after it has been in operation for more than three years if it was not a nuisance at the time it began; that the described property is in or near agricultural districts and that the residents of the property should be prepared to accept the inconveniences and discomfort associated with normal farm activities. This covenant shall run with the land and be binding upon all future owners, heirs, successors, and assigns to the property. (§ 2, Ord. 14-13, eff. October 8, 2014; § 1(2) (Atts. 1, 2), Ord. 20-18, eff. February 3, 2021. Formerly 9.40.180)"

3.2.4 - Methodology

Farmland Mapping and Monitoring Program

As discussed above, FMMP is a farmland classification system administered by the Department of Conservation. Important farmland maps are based on the Land Inventory and Monitoring criteria,

which classify a land's suitability for agricultural production. The impact analysis in this section includes discussion of FMMP and evaluation of impacts to protected farmland.

Land Evaluation and Site Assessment

The California Land Evaluation and Site Assessment (LESA) Model was utilized in the impact analysis shown below. The California LESA Model was developed "to provide lead agencies with an optional methodology to ensure that significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process" (Public Resources Code [PRC] § 21095).

The California LESA Model is composed of six different factors. Two Land Evaluation factors are based upon measures of soil resource quality. Four Site Assessment factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, each of these factors is separately rated on a 100-point scale. The factors are then weighted relative to one another and combined, resulting in a single numeric score for a given project, with a maximum attainable score of 100 points. It is this project score that becomes the basis for making a determination of a project's impact based on the scoring thresholds of significance.

Cumulative Analysis

The geographic scope of the cumulative agriculture and forest analysis is the City of Clovis. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to agriculture. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.2.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to agriculture and forestry resources are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code

Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

d) Result in the loss of forest land or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use.

3.2.6 - Project Impacts and Mitigation Measures

Convert Farmland to Nonagricultural Use

Impact AG-1:	**The proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use.**

Impact Analysis

An impact could result if the proposed project would result in a conversion of Farmland that exceeds the numerical thresholds established by the Department of Conservation.

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and, as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the agricultural land of the Non-development Area would not change as part of the proposed project's Non-development Area. Approval of the SOI Expansion would not result in physical development and, as such, would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use. Therefore, no impacts would occur.

MP Area 2

Development within MP Area 2 would result in the permanent conversion of approximately 138.14 acres of Farmland of Local Importance, as designated by the Department of Conservation on the Important Farmland Finder[7] and as shown on Exhibit 3.2-1 to nonagricultural use. After looking at site-specific characteristics more closely for MP Area 2, it is noteworthy that the Department of Conservation designations do not accurately and fully consider site specific characteristics such as the lack of any irrigation or crop production in MP Area 2. To reconcile these facts and analyze the site-specific characteristics more fully, the General Plan calls for the use of the LESA to evaluate the

[7] California Department of Conservation. 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 2, 2025.

significance of the agricultural conversion. It is noted that the LESA model was developed by the Department of Conservation, which is the same agency that published the Important Farmland Map.

Consistent with General Plan EIR MM 2-3, the California LESA model was utilized to determine the Master Plan's potential impact on agricultural resources. The LESA scoring for the proposed Master Plan Area is documented on the LESA scoring sheets in Appendix C. The proposed Master Plan Area has a final LESA score of 40.44, which is a significant impact only if the LESA sub-scores are both greater than or equal to 20 points. The Master Plan Area has a sub-score of 25.44 for the Land Evaluation; however, it has a sub-score of 15 for the Site Assessment. Because both scores are not equal to or greater than 20, the conversion of the land within the Master Plan Area is not considered significant according to the Department of Conservation's established thresholds.

Further, after evaluating the site-specific soil characteristics, project size, surrounding uses, agricultural protection zones, water resources availability, and ongoing economic feasibility of agricultural operations utilizing the LESA model, it was determined that the conversion of the land in the proposed Master Plan Area would not result in a significant impact. As such, implementation of the proposed Master Plan would result in a less than significant impact.

Vista Ranch Development/MP Area 1

Development of MP Area 1 would result in the permanent conversion of approximately 338.10 acres of Farmland of Local Importance, as designated by the Department of Conservation on the Important Farmland Finder[8] and as shown on Exhibit 3.2-1, to nonagricultural use. Consistent with General Plan EIR MM 2-3, the California LESA model was utilized to determine the potential impacts on agricultural resources for the entire Master Plan Area, including MP Area 1. As described above, the proposed Master Plan Area would have a less than significant impact related to the conversion of Farmland to nonagricultural uses according to the LESA model. Therefore, the proposed Vista Ranch Development would also have a less than significant impact in this regard.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

The following mitigation measure from the General Plan EIR is applicable to the proposed project. However, with the preparation of a LESA Model for the Master Plan Area, the proposed project has demonstrated full compliance with this measure and no further mitigation is required.

[8] California Department of Conservation. 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 2, 2025.

MM 2-3 Pending adoption of a regional agricultural preservation program or local [Farmland Preservation Program (FPP)], or if a regional agricultural preservation program or local FPP is not in place by June 25, 2017, the following requirements shall apply:

(1) Project applicants for properties that include more than 20 acres designated Prime Farmland, Farmland of Statewide Importance, or Unique Farmland shall be prepare or fund an agricultural resource evaluation prior to project approval.
(2) The resource evaluation shall use generally accepted methodologies (such as the Land Evaluation and Site Assessment Model) to identify the potentially significant impact of the loss of agricultural land.
(3) If the loss of agricultural land is determined to be a potentially significant impact, the resource evaluation shall consider the economic viability of future agricultural use of the property.
(4) If the agricultural resource is considered significant (based on LESA or other accepted methodology) and future agricultural use is considered economically viable, the conversion will be deemed significant. The City shall require mitigation by one of the following methods:
    (a) Mitigation at a 1:1 ratio of converted to preserved acreage through a regional conservation easement, or payment of its valuation equivalent if a fee mitigation program is established. If 1:1 mitigation is deemed to be economically infeasible, based upon all of the evidence, the ratio may be reduced to an economically feasible ratio or no further mitigation shall be required. This determination shall be made by the City's Director of Planning and Development services based upon substantial evidence in the record; or
    (b) Other potential mitigation which achieves the same mitigating effect as the measures identified above, consistent with the CEQA Statutes and Guidelines. This determination shall be made by the City's Director of Planning and Development Services based upon substantial evidence in the record.

    One possible substitute mitigation measure to achieve the preservation of agricultural land is through the use of benchmark densities that are designed to increase development efficiency. When development equals or exceeds the benchmark densities, no further mitigation is required because the community has taken steps to preserve agricultural land by increasing densities beyond a certain threshold thereby accommodating growth trends on less land. When development does not equal or exceed the benchmark densities, a sliding scale of mitigation fees are paid.

    The General Plan contains many efficiency policies and land use designations to aid in the preservation of agricultural land, which are based upon the San Joaquin Valley Blueprint and Landscape of Choice principles. See, for example: Land Use Element Goal 3 (orderly and sustainable outward growth into three Urban Centers); Land Use Element Goal 4, Policy 3.8 (land use compatibility); Land Use Element Goal 4, Policy 3.9 (connected

development; Land Use Element Goal 4, Policy 4.4 (farmland conservation); Land Use Element Goal 5 (diverse housing and transit oriented development); Land Use Goal 6, Policy 6.2 (smart growth); Land Use Element, Table LU-2 (land use designations); Economic Development Element, Goal 1, Policy 1.2 (jobs-housing ratio); Economic Development Element, Goal 5 (mix of land uses and types of development); Circulation Element, Goal 1, Policy 1.8 (network completion); Circulation Element, Goals 3 and 4, multimodal transportation, bicycle and transit system); Open Space and Conservation Element Goal 2, Policies 2.4 and 2.5 (agricultural lands and right to farm); Air Quality Element, Goal 1, Policy 1.1 (land use and transportation); 2010 Housing Element, Regional Housing Needs Assessment (RHNA) requirements; Fresno COG Sustainable Communities Strategy. These efficiency policies and land use designations are designed to prevent the premature conversion of farmland by encouraging infill development, by requiring new development to be built at considerably higher densities than Clovis or the region has traditionally seen, by requiring that development occur in a compact, orderly manner, and by providing for balanced development, including substantial emphasis on increasing the jobs-housing ratio.

To the extent benchmark densities are adopted for Clovis or the region, and to the extent the City's General Plan policies and land use designations are consistent with those benchmark densities, mitigation may be met through implementation of the General Plan and application of the benchmark densities.

(5) The following properties are determined to be not economically viable for future agricultural use, based upon all of the evidence in the record. Other properties shall be evaluated on a case by case basis:

All properties within the Loma Vista Specific Plan ("Loma Vista").

- Properties within Loma Vista were designated for urban development under the 1993 General Plan and the 2003 Loma Vista Specific Plan (formerly called the Southeast Urban Center Specific Plan).
- The Loma Vista Specific Plan EIR, page 5-34, makes the following observations:
  "The project area is located adjacent to the incorporated Clovis City, within the updated 2000 sphere-of-influence limits, thereby supporting concentrated growth pattern adjacent to the existing urban development. The proposed Specific Plan would guide the conversion of the existing agricultural and rural lands to planned urban uses in a gradual, phased, and orderly manner, therefore alleviating development pressure off of outlying unincorporated lands."
- Substantial development has occurred in Loma Vista since 2003.

- The City, property owners and the development community have relied upon this urbanization in planning for and developing Loma Vista
- The 2000 County General Plan, Land Use Policy LU-G, provides that the County will direct urban growth and development within city spheres of influences to existing incorporated cities, and this policy is memorialized in the City's Memorandum of Understanding with the County, as amended in 2000 (commonly referred to as the Tax Sharing MOU).
- The Tax Sharing MOU addresses Loma Vista and recognizes this area as becoming substantially urbanized. In fact, before development could proceed outside of Loma Vista, 60% of the developable area in Loma Vista has to be committed to development.
- In 2008, the City adopted a master plan community zone district for the Loma Vista Community Centers North and South and app[roved a master site plan for those sites. Projects adjacent to and within the Community Centers have been approved or are pending.
- The development community has nine pending project applications for development within Loma Vista.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative development could convert agricultural uses to nonagricultural uses. Development in accordance with the continued implementation of the approved General Plan would result in a significant impact on agricultural resources. However, all cumulative development within the City, would be required to comply with General Plan EIR MM 2-3, which requires evaluation and mitigation for significant agricultural resources on a project-by-project basis. MP Area 2 has satisfied this requirement and complied with General Plan EIR MM 2-3. Nonetheless, even with the implementation of this mitigation measure, cumulative impacts would be potentially significant.

However, the proposed project's incremental contribution to cumulative impacts would not be cumulatively considerable. Development of MP Area 2 would result in the permanent conversion of approximately 138 acres of Farmland of Local Importance, as designated by the Department of Conservation on the June 2020 Important Farmland Map and as shown on Exhibit 3.2-1, to nonagricultural use. However, as discussed above, the conversion of this farmland was evaluated using a LESA model, which determined that impacts would be less than significant in compliance with General Plan EIR MM 2-3. Additionally, buildout of MP Area 2 was previously analyzed within the City's General Plan EIR. Development within MP Area 2 would be consistent with the conversion of agricultural land previously analyzed in the General Plan and would not introduce new or more severe impacts than what was previously disclosed. Therefore, the proposed MP Area 2 would not result in a cumulatively considerable contribution to the potentially significant cumulative impact, and, as such,

the proposed Master Plan, in conjunction with other planned and approved projects, would result in a less than significant cumulative impact with respect to agricultural resources.

Vista Ranch Development/MP Area 1

Cumulative development could convert agricultural uses to nonagricultural uses. Development in accordance with the continued implementation of the approved General Plan would result in a significant impact on agricultural resources. However, all cumulative development within the City, including the Vista Ranch Development, would be required to comply with General Plan EIR MM 2-3, which requires evaluation and mitigation for significant agricultural resources on a project-by-project basis. The Vista Ranch Development has satisfied this requirement and complied with General Plan EIR MM 2-3. Nonetheless, even with the implementation of this mitigation measure, cumulative impacts would be potentially significant.

However, the proposed project's incremental contribution to cumulative impacts would not be cumulatively considerable. Development of MP Area 1 would result in the permanent conversion of approximately 338 acres of Farmland of Local Importance, as designated by the Department of Conservation on the Important Farmland Finder[9] and as shown on Exhibit 3.2-1, to nonagricultural use. As discussed above, the conversion of this farmland was evaluated using a LESA model, which determined that impacts would be less than significant. Additionally, buildout of MP Area 1 was previously analyzed within the City's General Plan EIR. Development within MP Area 1 would be consistent with the conversion of agricultural land previously analyzed in the General Plan and would not introduce new or more severe impacts than what was previously disclosed. Therefore, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the potentially significant cumulative impact, and, as such, the proposed Vista Ranch Development, in conjunction with other planned and approved projects, would result in a less than significant cumulative impact with respect to agricultural resources.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Less than cumulatively considerable contribution.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution.

Mitigation Measures

None.

[9] California Department of Conservation. 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 2, 2025.

Conflict with Existing Zoning or Williamson Act Contract

Impact AG-2: The proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

Impact Analysis

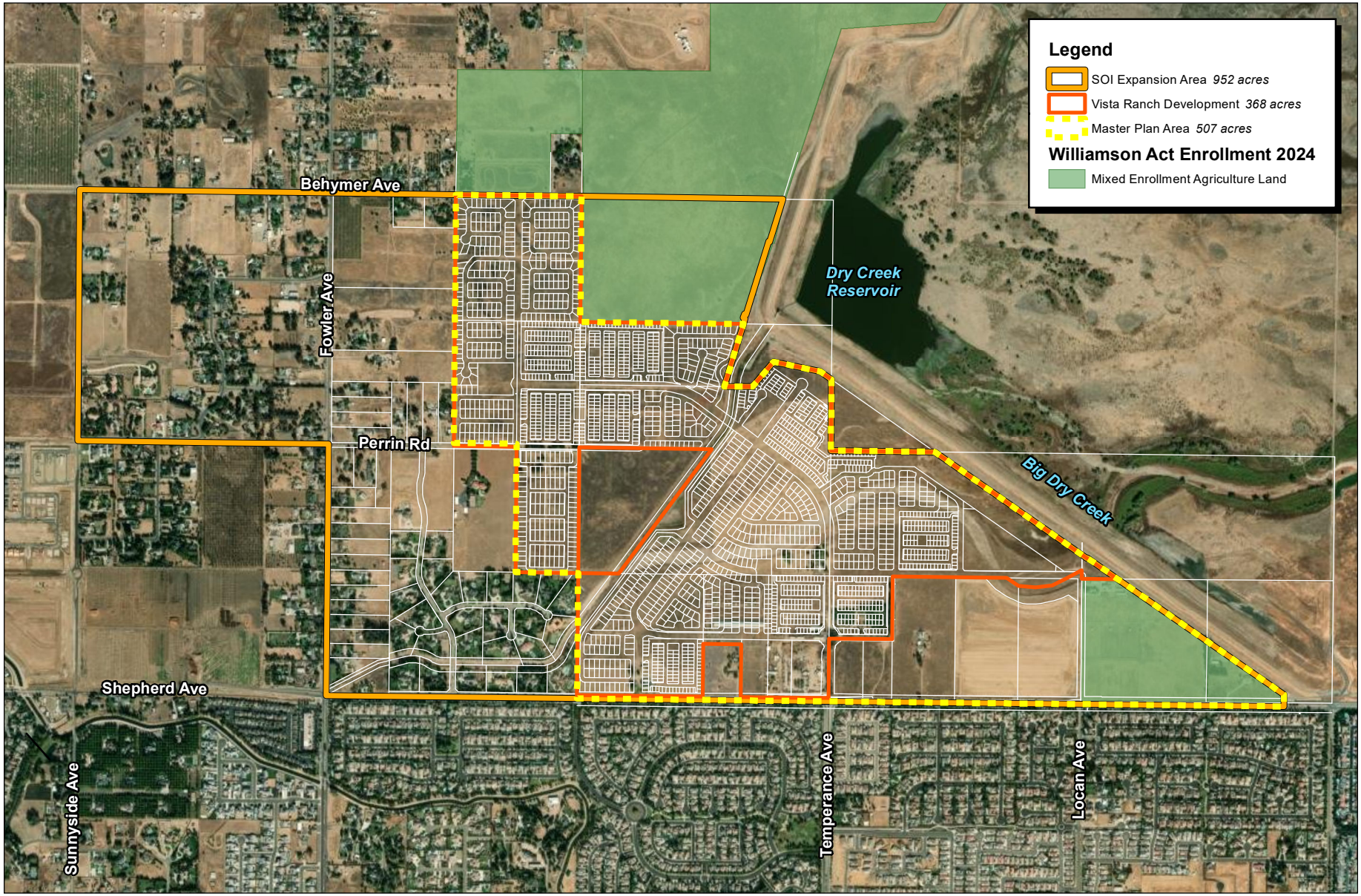
SOI Expansion and Non-development Area

There is one parcel within the Non-development Area under a Williamson Act Contract (Exhibit 3.2-3). Additionally, most of the SOI Expansion Area is currently zoned for agricultural uses. However, the SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, there would be no conflicts with existing zoning or Williamson Act contracts. As such, no impact would occur.

MP Area 2

There are two parcels within MP Area 2 with an active Williamson Act contract. The parcels are located in the southeastern corner of the SOI Expansion Area. These parcels total 34.17 acres and are not anticipated for immediate development. MP Area 2, which is not anticipated for immediate development, includes approximately 139 acres controlled by several property owners within the Master Plan Area, but these areas would be required to have a project-level CEQA analysis when the property owners decide to develop the parcels. A Williamson Act contract is a voluntary agreement and a cancellation process is defined in Williamson Act Cancellation Process, Guide for Local Governments. The process can involve a filing of non-renewal and a lapse of the appropriate time or a standard cancellation with a fee assessment.

Under the General Plan, the Master Plan Area is designated mostly for Low Density Residential, with Rural Residential designations along the western portion. The Master Plan Area is currently zoned for agricultural use (Exclusive Agricultural [AE20], Limited Agricultural [AL20], and Rural Residential [RR]). The proposed land use designation is Mixed Use Village (MU-V), and the pre-zoning is varied by Planning Area and would include residential, commercial, recreation, industrial, and open space uses. Any future development within MP Area 2 would be required to comply with the proposed pre-zoning requirements. Additionally, conversion of MP Area 2 from its current vacant and grazing uses to urban uses has been anticipated by the City under the adopted General Plan. Therefore, development of MP Area 2 of the Master Plan would not have any impact beyond what was already anticipated in the General Plan EIR. MP Area 2 MM AG-2 would ensure that there is no conflict with a Williamson Act contract as it would require future development to demonstrate that there is not an active Williamson Act contract encumbering the subject property prior to development. Implementation of MP Area 2 of the Master Plan would have a less than significant impact relative to conflicts with existing zoning and an active Williamson Act Contract with mitigation incorporated.



Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. California Division of Land Resource Protection.

1,500 750 0 1,500 Feet

Exhibit 3.2-3
Williamson Act Map

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Vista Ranch Development/MP Area 1

There are no parcels within MP Area 1 under an active Williamson Act Contract. Under the General Plan, MP Area 1 is designated mostly for Low Density Residential, with Rural Residential designations along the western portion, and MP Area 1 is currently zoned for agricultural use (AE20, AL20, and RR). The proposed land use designation is MU-V, and the pre-zoning is varied by Planning Area. The proposed pre-zoning is consistent with the proposed residential, commercial, recreation, and open space uses. Additionally, conversion of the majority of MP Area 1 from its current vacant and grazing uses to urban uses has been anticipated by the City under the adopted General Plan. Therefore, development of the Vista Ranch Development would not have any impact beyond what was already anticipated in the General Plan EIR. As such, the Vista Ranch Development would have a less than significant impact relative to conflicts with existing zoning and no impact with respect to conflicts with active Williamson Act Contract.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

MM AG-2 The project applicant for any development within the Master Plan (Master Plan) shall provide the City of Clovis (City) with evidence that there is not an active Williamson Act Contract encumbering their property. The property owner(s) of Planning Area (PA) 29 shall adhere to the "Williamson Act Cancellation Process, Guide for Local Governments."

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects located in the City would have the potential to result in a cumulative impact if, in combination, they would conflict with or obstruct implementation of the City's General Plan. Similarly, individual projects that are inconsistent with the regional planning documents upon which the General Plan is based would have the potential to result in cumulative impacts if they represent development beyond regional projections. Cumulative development could conflict with existing agricultural zoning and Williamson Act Contracts. Development in accordance with the continued implementation of the approved General Plan would be required to terminate any active Williamson Act Contracts through the nonrenewal process or contract cancellation. Cumulative development would also be required to

evaluate potential impacts and mitigate on a project-by-project basis. In this case, cumulative impacts would be potentially significant.

There are two parcels within the Master Plan Area with an active Williamson Act contract. The parcels are located within PA 29. These parcels total 34.17 acres and are part of MP Area 2, which is not anticipated for immediate development. MP Area 2 includes approximately 139 acres controlled by several property owners within the Master Plan Area, but these areas would be required to have a project-level CEQA analysis when the property owners decide to develop the parcels. Immediate development would have the potential for a conflict because the Williamson Act contract is in effect, however, immediate development is not anticipated for the parcels under a Williamson Act contract. A Williamson Act contract is a voluntary agreement and the cancellation process is defined in Williamson Act Cancellation Process, Guide for Local Governments. The process can involve a filing of non-renewal and a lapse of the appropriate time, or a standard cancellation with a fee assessment. Additionally, MP Area 2 MM AG-2 would ensure that there is no conflict with a Williamson Act contract, as it would require future development to demonstrate that there is not an active Williamson Act contract encumbering the subject property. Additionally, buildout of MP Area 2 was previously analyzed within the City's General Plan EIR. Development within MP Area 2 would be consistent with the conversion of agricultural land previously analyzed in the General Plan EIR and would not introduce new or more severe impacts than what was previously disclosed. Implementation of MP Area 2 would have a less than significant impact relative to conflicts with existing zoning and an active Williamson Act Contract with mitigation incorporated. Additionally, it would not facilitate or contribute to any other Williamson Act contract cancellation. Thus, impacts would not combine with other cumulative impacts and would not result in a cumulatively considerable contribution to potentially significant cumulative impacts, and cumulative impacts would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Cumulative development could conflict with existing agricultural zoning and Williamson Act Contracts. Cumulative projects located in the City would have the potential to result in a cumulative impact if, in combination, they would conflict with or obstruct implementation of the City's General Plan. Similarly, individual projects that are inconsistent with the regional planning documents upon which the General Plan is based would have the potential to result in cumulative impacts if they represent development beyond regional projections. Development in accordance with the continued implementation of the approved General Plan would be required to terminate any active Williamson Act Contracts through the nonrenewal process or contract cancellation. Cumulative development would also be required to evaluate potential impacts and mitigate on a project-by-project basis. In this case, cumulative impacts would be potentially significant.

There are no parcels within MP Area 1 under an active Williamson Act Contract. Therefore, the Vista Ranch Development would have no contribution to any cumulative impacts. Under the General Plan, MP Area 1 is designated mostly for Low Density Residential, with Rural Residential designations along the western portion. The proposed land use designation is MU-V, and the pre-zoning is varied by Planning Area. The proposed pre-zoning is consistent with the proposed residential, commercial, recreation, and open space uses. Additionally, conversion of MP Area 1 from its current vacant and

grazing uses to urban uses has been anticipated by the City under the adopted General Plan. Therefore, development of the Vista Ranch Development would not have any impact beyond what was already anticipated in the General Plan EIR. As such, the Vista Ranch Development would have a less than significant impact relative to conflicts with existing zoning and an active Williamson Act Contract. Thus, the Vista Ranch Development would not result in a cumulatively considerable contribution to potentially significant cumulative impacts.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution.

Mitigation Measures

MP Area 2

Implement project-specific MM AG-2; no additional mitigation is required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Forest Land and Timberland

Impact AG-3:	**The proposed project would not 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)).**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, there are no areas within the SOI Expansion Area zoned as forest land, timberland, or timberland production. As such, the SOI Expansion would have no impact related to conflicts with existing zoning for forest land, timberland, or timberland production.

MP Area 2

Under the Clovis General Plan, the Master Plan Area is designated mostly for Low Density Residential, with Rural Residential designations along the western portion, and the Master Plan Area is currently zoned for agricultural use (AE20, AL20, and RR). As such, there are no areas within the Master Plan Area that are zoned for forest land, timberland, or timberland production. Thus the Master Plan would have no impact related to conflicts with existing zoning for forest land, timberland, or timberland production.

Vista Ranch Development/MP Area 1

Under the Clovis General Plan, MP Area 1 is designated mostly for Low Density Residential, with Rural Residential designations along the western portion, and MP Area 1 is currently zoned for agricultural use (AE20, AL20, and RR). As such, there are no areas within MP Area 1 that are zoned for forest land, timberland, or timberland production. Therefore, the Vista Ranch Development would have no impact related to conflicts with existing zoning for forest land, timberland, or timberland production.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to any of the City's thresholds related to forest resources as a result of the proposed project; accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Conversion of Forest Land

Impact AG-4: The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, there are no areas within the SOI Expansion Area that contain forest land. As such, the SOI Expansion would have no impact related to the conversion of forest land to non-forest use.

MP Area 2

There are no areas within the Master Plan Area that contain forest land. The Master Plan would have no impact related to the conversion of forest land to non-forest use.

Vista Ranch Development/MP Area 1

There are no areas within MP Area 1 that contain forest land. As such, the Vista Ranch Development would have no impact related to the conversion of forest land to non-forest use.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to any of the City's thresholds related to forest resources as a result of the proposed project; accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Other Changes to Convert Farmland to Nonagricultural Use or Forest Land to Non-forest Use

Impact AG-5:	**The proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. As such, the SOI Expansion would have no impact related to the conversion of farmland to nonagricultural use or forest land to non-forest use.

MP Area 2

The City's General Plan anticipates that some agricultural lands within the City and its Planning Area would ultimately develop with urban uses. However, the City has a Right to Farm Ordinance, which is intended to reduce the occurrence of potential conflicts between nonagricultural and agricultural land uses within the City. This ordinance requires the transferer of any property within the City to provide a disclosure statement detailing that the City permits agricultural operations, including those that utilize chemical fertilizers and pesticides. Therefore, implementation of MP Area 2 of the proposed Master Plan would have a less than significant impact.

Vista Ranch Development/MP Area 1

The City's General Plan anticipates that some agricultural lands within the City and its Planning Area would ultimately develop with urban uses. The City has a Right to Farm Ordinance, which is intended to reduce the occurrence of potential conflicts between nonagricultural and agricultural land uses within the City. This ordinance requires the transferer of any property within the City to provide a disclosure statement detailing that the City permits agricultural operations, including those that utilize chemical fertilizers and pesticides. Therefore, the Vista Ranch Development would have a less than significant impact.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects located in the City would have the potential to result in a cumulative impact if, in combination, they would conflict with or obstruct implementation of the City's General Plan. Similarly, individual projects that are inconsistent with the regional planning documents upon which the General Plan is based would have the potential to result in cumulative impacts if they represent development beyond regional projections. While the General Plan anticipates that agricultural lands within the City's Planning Area would develop into urban uses, cumulative development projects would be required to comply with the City's Right to Farm Ordinance, which would reduce conflicts between nonagricultural and agricultural uses within the City as described above. Therefore, cumulative impacts would be less than significant.

Because development within MP Area 2 would be required to comply with the City's Right to Farm Ordinance and because the proposed project would not facilitate any additional conversion of agricultural land to nonagricultural uses, MP Area 2 of the proposed Master Plan would not result in a cumulatively considerable contribution to this less than significant cumulative impact.

Vista Ranch Development/MP Area 1

While the General Plan anticipates that agricultural lands within the City's Planning Area would develop into urban uses, cumulative development projects would be required to comply with the City's Right to Farm Ordinance, which would reduce conflicts between nonagricultural and agricultural uses within the City as described above. Therefore, cumulative impacts would be less than significant.

Because development within MP Area 1 would be required to comply with the City's Right to Farm Ordinance and because the proposed project would not facilitate any additional conversion of agricultural land to nonagricultural uses, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to this less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.3 - Air Quality

3.3.1 - Introduction

This section describes existing air quality conditions regionally and locally, as well as the relevant regulatory framework. This section also evaluates the potential impacts related to air quality that could result from implementation of the proposed project.

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to air quality.

- Comment requesting that construction equipment be located away from the school site and implement the best available technology to minimize air and noise pollution during construction, as well as avoid vehicle idling and adhere to local noise ordinances. (pp. 3.3-35 to 3.3-36; 3.3-46)
- Comment requesting that a construction Health Risk Assessment (HRA) be prepared for all construction activities within 1,000 feet of an active school site. (pp. 3.3-54 to 3.3-59)
- Comment recommending the Revised Draft EIR incorporate strategies to reduce VMT and require cleanest available heavy-duty trucks, vehicles, and off-road equipment. (pp. 3.3-27 to 3.3-61)
- Comment requesting that the Revised Draft EIR incorporate strategies that would advance implementation of the best practices listed in Tables 5 and 6 of California Air Resource Board's (ARB's) Freight Handbook Concept Paper, to the extent feasible.[1]
- Comment recommending that a more detailed preliminary review of the proposed project be conducted for the proposed project's construction and operational emissions. (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
- Comment stating that operational air emissions from mobile sources and stationary sources should be analyzed separately and lists a recommended mitigation measure for operational emissions. (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
- Comment recommending that the Revised Draft EIR include a discussion characterizing an appropriate trip length distance for heavy heavy-duty truck (HHDT) travel and reflect such appropriate distance supported by project-specific factors. (p. 3.3-27)
- Comment stating that project-related criteria pollutant emissions should be identified and quantified using the California Emission Estimator Model (CalEEMod). (p. 3.3-27)

[1] Comment raising issues regarding freight facilities; however, the proposed project would not involve the siting of freight facilities; therefore, the comment is not applicable.

- Comment stating that an HRA should be performed for the proposed project and provides recommendations for protocols and analyses. (pp. 3.3-54 to 3.3-59)
- Comment recommending that development projects resulting in toxic air contaminant (TAC) emissions should be located an adequate distance from sensitive receptors. (pp. 3.3-35 to 3.3-47; 3.3-54 to 3.3-59)
- Comment recommending that an Ambient Air Quality Analysis (AAQA) be performed for the proposed project if emissions exceed 100 pounds per day of any pollutant. (pp. 3.3-27 to 3.3-29)
- Comment recommending that the Revised Draft EIR include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for the proposed project. (pp. 3.3-46 to 3.3-47)
- Comment recommending that the Revised Draft EIR include language requiring projects not requiring a project-specific discretionary approval to prepare a technical assessment, in consultation with the San Joaquin Valley Air Pollution Control District (SJVAPCD), to determine whether additional analysis and/or mitigation is required. (p. 3.3-46)
- Comment recommending that the City of Clovis (City) evaluate HHDT routing patterns for the proposed project, with the aim of limiting exposure of residential communities and sensitive receptors to emissions. (p. 3.3-27)
- Comment recommending measures to reduce operational emissions from HHDT and on-site service equipment. (p. 3.3-27)
- Comment recommending that the Revised Draft EIR include measures to ensure compliance of the State anti-idling regulation (13 California Code Regulations [CCR] § 2485 and 13 CCR § 2480) and discuss the importance of limiting the amount of idling, especially near sensitive receptors. (pp. 3.3-15; 3.3-42)
- Comment recommending that the Revised Draft EIR include a measure requiring the assessment and potential installation, as technologically feasible, of particulate matter emission control systems for new large restaurants operating under-fired charbroilers. (p. 3.3-46)
- Comment suggesting the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors. (pp. 3.3-55 to 3.3-59)
- Comment recommending that the proposed project proponent consider the SJVAPCD's Clean Green Yard Machines (CGYM) program which provides incentive funding for replacement of existing gas-powered lawn and garden equipment. (p. 3.3-46)
- Comment recommending that the City require all nonresidential buildings be designed to provide electric infrastructure to support the use of on-road zero emissions vehicles, such as medium heavy-duty trucks (MHDT) and HHDT associated with a commercial project. (p. 3.3-46)

- Comment outlining SJVAPCD Rules and Regulations applicable to the proposed project. (pp. 3.3-16 to 3.3-20)
- Comment requesting that the Revised Draft EIR include air quality and GHG emissions analysis that considers impacts to the City of Fresno. (pp. 3.3-35 to 3.3-62)
- Comment requesting that the Revised Draft EIR analyze and mitigate air quality impacts. (pp. 3.3-35 to 3.3-62)
- Comment stating concerns related to an increase in air, water, and noise pollution. (pp. 3.3-35 to 3.3-62)

3.3.2 - Environmental Setting

The Sphere of Influence (SOI) Expansion Area is located directly north of the city limit line, in unincorporated Fresno County (County) and within the San Joaquin Valley Air Basin (SJVAB) and the boundaries of SJVAPCD. Regional and local air quality is impacted by topography, dominant airflows, atmospheric inversions, location, and season. The following section describes these conditions as they pertain to the SJVAB.[2]

Although air pollution potential is strongly influenced by climate and topography, the air pollution that occurs in a location also depends on the amount of air pollutant emissions in the surrounding area or transported from more distant places. Air pollutant emissions generally are highest in areas that have high population densities, high motor vehicle use, and/or industrialization. These contaminants, created by photochemical processes in the atmosphere, such as ozone, may result in high concentrations many miles downwind from the sources of their precursor chemicals.

San Joaquin Valley Air Basin

Topography and Meteorology

Air pollution, especially the dispersion of air pollutants, is directly related to a region's topographic features. Air quality is a function of both the rate and location of pollutant emissions and the meteorological conditions and topographic features that influence pollutant movement and dispersal. Atmospheric conditions such as wind speed, wind direction, atmospheric stability, and air temperature gradients interact with the physical features of the landscape to determine the movement and dispersal of air pollutants, which affects ambient air quality.

The SJVAB is generally shaped like a bowl. It is open in the north and is surrounded by mountain ranges on all other sides. The Sierra Nevada mountains are along the eastern boundary (8,000 to 14,000 feet in elevation), the Coast Ranges are along the western boundary (3,000 feet in elevation), and the Tehachapi Mountains are along the southern boundary (6,000 to 8,000 feet in elevation). The SJVAB has an "inland Mediterranean" climate and is characterized by long, hot, dry summers and

[2] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. February 19. Website: https://archive.valleyair.org/transportation/ceqa_guidance_documents.htm. Accessed April 16, 2025.

short, foggy winters. Sunlight can be a catalyst in the formation of some air pollutants (such as ozone); the SJVAB averages over 260 sunny days per year. The climate is a result of the topography and the strength and location of a semi-permanent, subtropical high-pressure cell.

Regional Climate and Air Pollution Potential

The climate is important for air quality because of differences in the atmosphere's ability to trap pollutants close to the ground, creating adverse air quality or rapidly dispersing pollutants over a wide area, thus preventing high concentrations from accumulating under different climatic conditions.

The valley topography and climate of the SJVAB create ideal conditions for trapping and holding pollutants within the valley. The particle and gaseous emissions can recirculate within the valley and accumulate to unhealthy levels. It is an especially dry climate, averaging just 6 inches of rainfall a year, which prevents particle pollution from coagulating or being tamped down by rain, and as a result, particles can remain suspended in the air for much longer than is typical.

Sources of Pollution

The SJVAB, which includes the City, faces persistent air pollution challenges because of its geography, climate, and human activity. Surrounded by mountains that trap pollutants, the SJVAB accumulates emissions from mobile sources like cars and trucks (especially along Interstate 5 [I-5] and State Route [SR] 99), industrial operations, agriculture, and residential wood-burning.[3,4] In the City specifically, fine particulate matter ($PM_{2.5}$) and ozone are the dominant pollutants, with contributions from vehicle traffic, dust from construction and farming, and seasonal wildfire smoke.[5] Despite improvements over the years, the City and the broader region remain in nonattainment for federal ozone and $PM_{2.5}$ standards, prompting ongoing efforts by the SJVAPCD to reduce emissions through regulations, incentives, and community engagement.[6]

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others given the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases. A sensitive receptor is a location where human populations, especially children, seniors, and sick people, are present and where there is a reasonable expectation of continuous human exposure to pollutants. Examples of

[3] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2025. Air Quality in the San Joaquin Valley. Website: https://www.valleyair.org/media/rtilgkou/2025-general-short-presentation-for-website_rev.pdf. Accessed July 21, 2025.

[4] California Air Resources Board (ARB). 2025. Clean-air plan for San Joaquin Valley First to Meet All Federal Standards for Fine Particle Pollution. Website: https://ww2.arb.ca.gov/news/clean-air-plan-san-joaquin-valley-first-meet-all-federal-standards-fine-particle-pollution. Accessed July 21, 2025.

[5] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2025. Real Time Air Monitoring Sites, Clovis. Website: https://www.valleyair.org/air-quality-information/real-time-air-quality/real-time-air-monitoring-stations/clovis/. Accessed July 21, 2025.

[6] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2025. San Joaquin Valley Attainment Status. Website: https://ww2.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/. Accessed July 21, 2025.

sensitive receptors include residences, hospitals, and schools. The closest sensitive receptors to the SOI Expansion Area include existing residences located within the SOI Expansion Area itself.

3.3.3 - Air Quality

Air pollutants are regulated to protect human health and for secondary effects such as visibility and building soiling. The Clean Air Act of 1970 tasks the United States Environmental Protection Agency (EPA) with setting air quality standards. The State of California also sets air quality standards that are, in some cases, more stringent than federal standards and address additional pollutants. The following section describes these federal and State standards and the health effects of the regulated pollutants.

National and State Ambient Air Quality Standards

Regulation of air pollution is achieved through both federal and State ambient air quality standards and permitted emission limits for individual sources of air pollutants. As required by the federal Clean Air Act (CAA), the EPA has identified criteria pollutants and has established National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. NAAQS have been established for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (specifically PM_{10} and $PM_{2.5}$), and lead. These pollutants are called "criteria" air pollutants because standards have been established for each of them to meet specific public health and welfare criteria.[7]

To protect human health and the environment, the EPA has set "primary" and "secondary" ambient standards for each of the criteria pollutants. Primary thresholds were set to protect human health, particularly sensitive receptors, such as children, the elderly, and individuals suffering from chronic lung conditions, such as asthma and emphysema. Secondary standards were set to protect the natural environment and prevent further deterioration of animals, crops, vegetation, and buildings.

Regional and Local Standards

The NAAQS establish the level for an air pollutant above which detrimental effects to public health or welfare may result. The NAAQS are defined as the maximum acceptable concentrations that, depending on the pollutant, may not be equaled or exceeded more than once per year or in some cases as a percentile of observations. California has generally adopted more stringent ambient air quality standards for the criteria air pollutants (i.e., California Ambient Air Quality Standards [CAAQS][8]). California has also established CAAQS for sulfates, hydrogen sulfide, and vinyl chloride; however, air emissions of these pollutants are not expected to occur under the proposed project and, thus, these pollutants are not addressed further in this section.

Table 3.3-1 presents both sets of ambient air quality standards (i.e., national and State) as well as attainment status for each of these standards within the SJVAPCD jurisdiction. If a pollutant concentration in an area is lower than the established standard, the area is classified as being in

[7] United States Environmental Protection Agency (EPA). Criteria Air Pollutants. Website: https://www.epa.gov/criteria-air-pollutants. Accessed July 31, 2025.

[8] California Air Resources Board (ARB). California Ambient Air Quality Standards (CAAQS). Website: https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards. Accessed July 31, 2025.

"attainment" for that pollutant. If the pollutant concentration meets or exceeds the standard (depending on the specific standard for the individual pollutants), the area is classified as a "nonattainment" area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated "unclassified."

Depending on the frequency and severity of pollutants exceeding applicable standards, the nonattainment designation can be further classified as serious nonattainment, severe nonattainment, or extreme nonattainment, with extreme nonattainment being the most severe of the classifications. An "unclassified" designation signifies that the data does not support either an attainment or nonattainment status. The California Clean Air Act of 1988 (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category. The EPA designates areas for O_3, CO, and NO_2 as "does not meet the primary standards," "cannot be classified," or "better than national standards." For SO_2, areas are designated as "does not meet the primary standards," "does not meet the secondary standards," "cannot be classified," or "better than national standards." However, the ARB terminology of attainment, nonattainment, and unclassified is more frequently used. The County has a State designation of Attainment or Unclassified for all criteria pollutants except for O_3, PM_{10}, and $PM_{2.5}$. The County has a national designation of either Unclassified or Attainment for all criteria pollutants except for O_3 and $PM_{2.5}$. Table 3.3-1 presents the State and national attainment status for the County.

As shown in Table 3.3-1, the State attainment status for the project area, located in the County, is currently nonattainment/severe for 1-hour O_3 standards, nonattainment for 8-hour O_3 standards, nonattainment for 24-hour and annual arithmetic mean (AAM) for PM_{10} standards, and nonattainment for AAM for $PM_{2.5}$ standards. The national attainment status for the project area is currently nonattainment/extreme for 8-hour O_3 standards and nonattainment for 24-hour and AAM for $PM_{2.5}$ standards. State and national standards of all the other criteria pollutants are classified as attainment and/or unclassified.

Table 3.3-1: State and National Criteria Pollutant Standards and SJVAPCD Attainment Status

Pollutant	Averaging Time	California Standards		National Standards	
Ozone (O_3)	1 hour	0.09 ppm	Nonattainment/ Severe	—	—
	8 hours	0.070 ppm	Nonattainment	0.075 ppm	Nonattainment/ Extreme
Particulate Matter (PM_{10})	AAM	20 µg/m^3	Nonattainment	—	—
	24 hours	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
Fine Particulate Matter ($PM_{2.5}$)	AAM	12 µg/m^3	Nonattainment	9 µg/m^3	Nonattainment
	24 hours	—	—	35 µg/m^3	Nonattainment
	1 hour	20 ppm	Attainment	35 ppm	Attainment

Pollutant	Averaging Time	California Standards		National Standards	
Carbon Monoxide (CO)	8 hours	9.0 ppm	—	9 ppm	—
Nitrogen Dioxide (NO_2)	AAM	0.030 ppm	Attainment	0.053 ppm	Attainment
	1 hour	0.18 ppm	Attainment	0.100 ppm	Attainment
Sulfur Dioxide (SO_2)	AAM	—	—	0.030 ppm	Attainment
	24 hours	0.04 ppm	Attainment	—	—
	3 hours	—	—	0.5 ppm	Attainment
	1 hour	0.25 ppm	Attainment	0.075 ppm	Unclassified
Lead	30 days	1.5 µg/m^3	Attainment	—	—
	Calendar quarter	—	—	1.5 µg/m^3	Attainment
	Rolling 3-month average	—	—	0.15 µg/m^3	Attainment
Sulfates	24 hours	25 µg/m^3	Attainment	No Federal Standards	
Hydrogen Sulfide	1 hour	0.03 ppm (42 µg/m^3)	Unclassified		
Vinyl Chloride	24 hours	0.01 ppm (42 µg/m^3)	Attainment		
Visibility-Reducing Particle Matter	8 hours	Extinction coefficient: 0.23/ kilometer- visibility of 10 miles or more (0.07–30 miles or more for Lake Tahoe) due to particles when the relative humidity is less than 70%	Unclassified		

Notes:
µg/m^3 = micrograms per cubic meter
AAM = annual arithmetic mean
ppm = parts per million
Sources: San Joaquin Valley Air Pollution Control District (SJVAPCD). 2020 and 2018.

Table 3.3-2 summarizes the SJVAB exceedances of the State and federal air quality standards over the period of 2021–2023.

Table 3.3-2: San Joaquin Valley Air Basin Exceedances 2021–2023

Exceedances of California and National Ambient Air Quality Standards for Past 3 Years			
Pollutant	**2021**	**2022**	**2023**
Ozone (O_3)			
Days over National 8-hour Standard	101	102	73
Days over California 8-hour Standard	104	104	104
Days over California 1-hour Standard	41	31	26
Particulate Matter			
Days over National $PM_{2.5}$ Standard	87	59	33
Days over National 24-hour PM_{10} Standard	3	1	1
Days over California 24-hour PM_{10} Standard	160	178	146
Notes: PM_{10} = particulate matter less than 10 microns in diameter $PM_{2.5}$ = particulate matter less than 2.5 microns in diameter Sources: California Air Resources Board (ARB). 2025. iAdam. 2025			

Winter $PM_{2.5}$ emissions have decreased significantly, in large part due to the effectiveness of Rule 4901 (Wood-burning Fireplaces and Wood-burning Heaters) and the ongoing phase-out of open agricultural burning.[9]

Fresno County Air Quality Monitoring

The SJVAPCD and ARB maintain air quality monitoring sites throughout the County that collect data for O_3, $PM_{2.5}$, and PM_{10}. The nearest active air quality monitoring site to the SOI Expansion Area is Clovis-North Villa Avenue. It is important to note that while the State retains the 1-hour standard, the federal O_3 1-hour standard was revoked by the EPA and is no longer applicable for federal standards. Data obtained from the monitoring sites between 2021 and 2023 (latest year of data available) is shown in Table 3.3-3.

Table 3.3-3: Air Quality Data Summary (2021–2023)

Air Pollutant	Averaging Time	Item	2021	2022	2023
Ozone (O_3)	1 Hour	Max 1 Hour (ppm)	0.123	0.109	0.102

[9] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2022. Chapter 2 Air Quality in the Valley: Challenges and Progress. Website: https://ww2.valleyair.org/media/nw2d1c3g/05-chapter-2-aqinvalley-challenges-and-progress.pdf. Accessed April 17, 2025.

Air Pollutant	Averaging Time	Item	2021	2022	2023
		Days > State Standard (0.09 ppm)	9	3	3
	8 Hour	Max 8 Hour (ppm)	0.1	0.084	0.083
		Days > Standard (0.070 ppm)	34	23	21
Nitrogen dioxide (NO_2)	Annual	Annual Average (ppm)	0.007	0.008	0.007
	1 Hour	Max 1 Hour (ppm)	0.0494	0.0518	0.0479
		Days > State Standard (0.18 ppm)	0	0	0
Inhalable coarse particles (PM_{10})	Annual	National Annual Average ($\mu g/m^3$)	**37.6**	**35.5**	**30.3**
	24 Hour	Highest State 24 Hour ($\mu g/m^3$)	**125**	**127**	**104.7**
		Days > State Standard (50 $\mu g/m^3$)	**111**	**73**	**44**
		Days > National Standard (150 $\mu g/m^3$)	0	0	0
Fine particulate matter ($PM_{2.5}$)	Annual	State Annual Average (12 $\mu g/m^3$)	*	10.5	8.6
	24 Hour	Highest Daily 24 Hour ($\mu g/m^3$)	**104.6**	**41.9**	34.7
		Days > National Standard (35 $\mu g/m^3$)	**22**	**4**	0

Notes:
"*" = no data
> = exceed
$\mu g/m^3$ = micrograms per cubic meter
Bold = exceedance
max = maximum
National Standard = National Ambient Air Quality Standard (NAAQS)
ppm = parts per million
State Standard = California Ambient Air Quality Standard (CAAQS)

Data is extracted from station at Clovis-North Villa Avenue approximately 4.2 miles southwest of the Sphere of Influence (SOI) Expansion Area.

In February 2024, the United States Environmental Protection Agency (EPA) announced the agency's proposed rule change of reducing the primary annual $PM_{2.5}$ NAAQS from 12 $\mu g/m^3$ to 9 $\mu g/m^3$. Meanwhile, the monitoring data available before year 2024 would be compared with the previous standard of 12 $\mu g/m^3$.

Source: California Air Resources Board (ARB). Top Four Summary. Website: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed July 30, 2025.

Criteria Air Pollutants

As stated, criteria air pollutant emissions are regulated pursuant to the CAA and CCAA due to the associated adverse health effects of exposure to these pollutants. Table 3.3-4 shows a general description of the source and health effects from the government-regulated criteria air pollutants of O_3, reactive organic gases (ROGs) and volatile organic compounds (VOCs), CO, NO_2, SO_2, particulate matter (specifically PM_{10} and $PM_{2.5}$), sulfates, and lead (Pb).

Table 3.3-4: Sources and Health Effects of Common Air Pollutants

Criteria Pollutant	Most Relevant Effects from Pollutant Exposure	Sources
Ozone	• Respiratory symptoms • Worsening of lung disease leading to premature death • Damage to lung tissue	• On-road and off-road mobile vehicle exhausts • Factories and industrial facilities • Consumer products
Particulate matter (PM_{10})	• Premature death and hospitalization, primarily for worsening of respiratory disease • Reduced visibility and material soiling	• Gasoline- and diesel-powered mobile vehicles • Dust from construction sites, landfills, and agriculture • Combustion from oil • Burning wood and wildfires • Burning of brush and wastes • Factories and industrial facilities
Particulate matter ($PM_{2.5}$)	• Premature death • Hospitalization for worsening of cardiovascular disease • Hospitalization for respiratory disease • Asthma-related emergency room visits • Increased symptoms, increased inhaler usage	• Gasoline- and diesel-powered mobile vehicles • Combustion from oil and wood
Nitrogen dioxide (NO_2)	• Lung irritation • Intensified allergic responses	• Motor vehicle internal combustion engines • Fossil fuel-fired electric utility and industrial boilers
Carbon monoxide (CO)	• Chest pain in patients with heart disease • Headache • Lightheadedness • Reduced mental alertness	• Motor vehicle internal combustion engines • Fossil fuel-fired electric utility and industrial boilers
Sulfur dioxide (SO_2)	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits	• Combustion of sulfur-containing fuel from motor vehicles, locomotives, ships, and off-road diesel equipment • Industrial processes • Geothermal fields
Lead (Pb)	• Impaired mental functioning in children • Learning disabilities in children • Brain and kidney damage	• Lead smelters • Piston-engine aircraft operating on leaded aviation gasoline • Waste incinerators

Criteria Pollutant	Most Relevant Effects from Pollutant Exposure	Sources
		• Utilities • Lead-acid battery manufacturers • Dust from soils contaminated with lead-based paint

Source: California Air Resources Board (ARB). 2023. Common Air Pollutants.

Toxic Air Contaminants

TACs, as known under the CCAA, are pollutants that have been identified through ambient air quality data as posing the most substantial health risk in California.[10] Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders. The ARB provides TAC emission inventories for only the larger air basins.

Sources include industrial processes such as petroleum refining and chrome-plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. TACs do not have ambient air quality standards. Since no safe levels of TACs can be determined, there are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with a given exposure. The requirements of the Air Toxic "Hot Spots" Information and Assessment Act apply to facilities that use, produce, or emit toxic chemicals. Facilities that are subject to the toxic emission inventory requirements of the Act must prepare and submit toxic emission inventory plans and reports to the ARB and periodically update those reports. The major TAC that affects health impacts in the air from typical construction and operational activities is diesel particulate matter (DPM). DPM from the operation of diesel trucks and heavy construction equipment has been identified by the ARB as a carcinogen that can result in long-term health impacts (see discussion below). According to ARB, it is estimated that approximately 70 percent of total known cancer risk related to air toxics in California is attributable to DPM. Therefore, the primary TAC of concern for the proposed project would be diesel exhaust, characterized by the emissions of DPM as a surrogate.

Diesel Particulate Matter

As stated, studies indicate that DPM poses the greatest health risk among the TACs listed above. A 10-year research program demonstrated that DPM from diesel-fueled engines is a human carcinogen and that chronic (long-term) inhalation exposure to DPM poses a chronic health risk.[11] In addition to increasing the risk of lung cancer, exposure to diesel exhaust can have other health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches,

[10] Sacramento Metropolitan Air Quality Management District (Sacramento Metro AQMD). TAC Emissions. Website: https://www.airquality.org/LandUseTransportation/Documents/Ch5TAC4-2020.pdf. Accessed July 31, 2025.

[11] California Air Resources Board (ARB). 1998. The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines. Website: https://ww2.arb.ca.gov/sites/default/files/classic/toxics/dieseltac/finexsum.pdf. Accessed April 17, 2025.

lightheadedness, and nausea. Diesel exhaust is a major source of fine particulate pollution as well, and studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems.

DPM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled engines contribute approximately 24 percent of the Statewide total, with an additional 71 percent attributed to other mobile sources such as construction and mining equipment, and agricultural equipment. Stationary sources contribute about 5 percent of total DPM.

Health Effects

Diesel exhaust and many individual substances contained in it (including arsenic, benzene, formaldehyde, and nickel) have the potential to contribute to mutations in cells that can lead to cancer. Long-term exposure to diesel exhaust particles poses the highest cancer risk of any TAC evaluated by the California Office of Environmental Health Hazard Assessment (OEHHA). The ARB estimates that approximately 70 percent of the cancer risk that the average Californian faces from breathing TACs stems from diesel exhaust particles.

In its comprehensive assessment of diesel exhaust, OEHHA analyzed more than 30 studies of people who worked around diesel equipment, including truck drivers, railroad workers, and equipment operators. The studies showed these workers were more likely to develop lung cancer than workers who were not exposed to diesel emissions. These studies provide strong evidence that long-term occupational exposure to diesel exhaust increases the risk of lung cancer. Using information from OEHHA's assessment, ARB estimates that diesel-particle levels measured in California's air in 2000 could cause 540 "excess" cancers (beyond what would occur if there were no diesel particles in the air) in a population of one million people over a 70-year lifetime. Other researchers and scientific organizations, including the National Institute for Occupational Safety and Health, have calculated similar cancer risks from diesel exhaust as those calculated by OEHHA and ARB.

Exposure to diesel exhaust can have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, diesel exhaust particles made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks.

Valley Fever

Coccidioidomycosis, or Valley Fever, is a long-studied fungal infection caused by inhaling spores of *Coccidioides immitis*, which live in dry, alkaline soil and become airborne when disturbed by wind, construction, or other activities. Common in hot, arid regions, the disease affects both humans and animals, especially those exposed to dust, such as outdoor workers and active individuals. Once inhaled, the spores lodge in the lungs, transform into spherules, and release endospores that can continue the infection cycle. As shown in Table 3.3-5, while about 60 percent of cases are mild or asymptomatic, others may experience fatigue, cough, rash, and joint pain—symptoms not unique to

Valley Fever—necessitating lab tests for diagnosis, including microscopic examination, cultures, serological tests, and skin testing. The disease is not contagious, and most people recover within 6 months, often gaining lifelong immunity. However, severe cases may require prolonged antifungal treatment using drugs like fluconazole or amphotericin B, with therapy length depending on disease severity and response.

Table 3.3-5: Range of Valley Fever Cases

Severity of Infection	Percentage of Patient Cases
Unapparent	60 percent
Mild to moderate	30 percent
Infections resulting in complications	5–10 percent
Fatal infections	<1 percent
Source: Valley Fever Center for Excellence. Check for Complications. Website: https://vfce.arizona.edu/valley-fever-people/check-complications. Accessed April 17, 2025.	

Asbestos

Asbestos is a term used for several types of naturally occurring fibrous minerals found in many parts of California. The three most common types of asbestos are chrysotile, amosite, and crocidolite. Chrysotile, also known as white asbestos, is the most common type of asbestos found in buildings. Chrysotile makes up approximately 90 to 95 percent of all asbestos contained in buildings in the United States. In addition, naturally occurring asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere from vehicular traffic on unpaved roads, during grading for development projects, and at quarry operations. Serpentinite and/or ultramafic rock are known to be present in 44 of California's 58 counties. These rocks are particularly abundant in the counties associated with the Sierra Nevada foothills, the Klamath Mountains, and Coast Ranges. According to information provided by the California Department of Conservation (DOC), Division of Mines and Geology, the SOI Expansion Area is not located in an area where naturally occurring asbestos is likely to be present.

3.3.4 - Regulatory Framework

In California, air quality is regulated by several agencies, including EPA, ARB, and local air districts such as the SJVAPCD. Each of these agencies develops rules and/or regulations to attain the goals or directives imposed upon them through legislation. Although EPA regulations may not be superseded, some State and local regulations may be more stringent than federal regulations. The SOI Expansion Area is located within the SJVAB, which is under the jurisdiction of the SJVAPCD. The

SJVAPCD has developed California Environmental Quality Act (CEQA) guidance for assessing air quality impacts.

Federal

United States Environmental Protection Agency

The principal air quality regulatory mechanism on the federal level is the CAA and the 1990 amendments to the CAA, and the NAAQS that it establishes. These standards identify levels of air quality for "criteria" pollutants that are considered the maximum levels of ambient (background) air pollutants considered safe, with an adequate margin of safety, to protect the public health and welfare. The criteria pollutants include ozone, CO, NO_2 (which is a form of NO_X [nitrogen oxide]), SO_2 (which is a form of sulfur oxide [SO_X]), PM_{10}, $PM_{2.5}$, and lead. The EPA also has regulatory and enforcement jurisdiction over emission sources beyond State waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. The EPA's primary role at the State level is to oversee the State air quality programs. The EPA sets federal vehicle and stationary source emission standards and oversees approval of all State Implementation Plans (SIPs), as well as providing research and guidance in air pollution programs. The SIP is a State-level document that identifies all air pollution control programs within California that are designed to meet the NAAQS.

State

California Air Resources Board

The ARB, a department of the California Environmental Protection Agency (Cal/EPA), oversees air quality planning and control throughout California by administering the SIP. Its primary responsibility lies in ensuring implementation of the 1989 amendments to the CCAA, responding to the federal CAA requirements, and regulating emissions from motor vehicles sold in California. The ARB also sets fuel specifications to further reduce vehicular emissions.

The amendments to the CCAA establish the CAAQS, and a legal mandate to achieve these standards by the earliest practical date. These standards apply to the same criteria pollutants as the federal CAA, and also include sulfates, visibility-reducing particulates, hydrogen sulfide, and vinyl chloride (there are currently no NAAQS for these latter pollutants). They are also generally more stringent than the national standards in most cases, although recently promulgated NAAQS for 1-hour NO_2 and SO_2 can in some instances be more stringent than the respective CAAQS.

The ARB is also responsible for regulations pertaining to TACs. The Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in 1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release into their local air basin. Each Air Pollution Control District (APCD) and Air Quality Management District (AQMD) in the State ranks the data into high, intermediate, and low priority categories. When considering the ranking, the potency, toxicity, quantity, volume, and proximity of the facility to receptors are given consideration by an air district.

The ARB also has on- and off-road engine emission reduction programs that would indirectly affect the proposed project's emissions through the phasing in of cleaner on- and off-road engines. Additionally, the ARB has a Portable Equipment Registration Program that allows owners or operators of portable engines and associated equipment to register their units under a Statewide program to operate their equipment, which must meet specified program emission requirements, throughout California without having to obtain individual permits from local air districts. Since the proposed project would not install any applicable stationary sources, the AB 2588 program would not apply to the proposed project.

In 2007, the ARB enacted a regulation for the reduction of DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles.[12] This regulation provides target emission rates for particulate matter and NO_X emissions for owners of fleets of diesel-fueled off-road vehicles. It applies to equipment fleets of three specific sizes, and the target emission rates are reduced over time with full implementation by 2023 for large and medium fleets and 2028 for small fleets.

In California, the ARB takes a more comprehensive approach to regulating TACs. ARB's regulations not only target emissions from industrial and mobile sources but also address land use and development sources. This includes conducting HRAs for new developments to ensure they do not negatively impact air quality and public health.

Air Toxics Hot Spots Information and Assessment Act (AB 2588)

The Hot Spots program requires selected categories of stationary sources to report the types and quantities of certain substances they release into the air. The goals are to collect emission data, identify facilities with localized impacts, assess health risks, notify nearby residents of significant risks, and reduce those risks to acceptable levels.

While development projects are not covered under the Hot Spots program, CEQA also uses the risk assessment methodologies and approved health values developed under the program to evaluate the potential health impacts of new developments, ensuring that land use and development projects do not exacerbate air quality issues.

Air Toxic Control Measures

California has implemented several Airborne Toxic Control Measures (ATCMs) specifically targeting internal combustion engines, diesel trucks, and gas stations to control TACs and protect public health. Some key ATCMs relevant to the proposed project include:

- **Stationary Compression Ignition Engine ATCM:** This measure applies to stationary diesel-fueled compression ignition (CI) engines used in various operations. It aims to reduce

[12] South Coast Air Quality Management District (SCAQMD). 2014. 13 California Code of Regulations Article 4.8, Chapter 9, Rule 2449. Control Of Oxides Of Nitrogen Emissions From Off-Road Diesel Vehicles. Website: https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiv/rule-2449.pdf. Accessed April 17, 2025.

emissions of DPM and other pollutants by requiring the use of best available control technologies and regular maintenance.[13]

- **ATCM to Limit Diesel-fueled Commercial Motor Vehicle Idling:** Requires that drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds, including buses and sleeper berth equipped trucks, not idle the vehicle's primary diesel engine longer than 5 minutes at any location.[14]
- **In-Use Off-Road Diesel-fueled Fleets Regulation:** This regulation applies to all self-propelled off-road diesel vehicles 25 horsepower (hp) or greater used in California. It aims to reduce emissions from older, high-emitting engines by requiring fleet owners to upgrade to newer, cleaner technologies.[15]

Assembly Bill 617

AB 617, known as the Community Air Protection Program, was enacted to address air pollution in California's most impacted communities. This legislation focuses on reducing exposure to TACs and other pollutants in disadvantaged areas. AB 617 mandates the development of community-specific air monitoring and emission reduction programs, ensuring that local residents have a say in the process.[16,17] It also enhances enforcement of existing air quality regulations and promotes the use of cleaner technologies. Projects located in ARB Community Air Risk Evaluation (CARE) areas have more stringent requirements compared to those in non-CARE areas, including more stringent requirements for HRAs, community engagement and more aggressive emission reduction measures. The proposed project is not located within a CARE or AB 617-identified community.

Title V and Extreme Designation

Title V of the CAA, as amended in 1990, creates an operating permit program for certain defined sources. In general, owner/operators of defined industrial or commercial sources that emit more than 25 tons per year of NO_X and ROG must process a Title V permit. In "Extreme Designation" areas, the definition of a major source that requires Title V permitting changes from 25 tons per year to 10 tons per year. This change results in more businesses having to comply with Title V permitting requirements under the Extreme nonattainment designation.

Title V does not impose any new air pollution standards, require installation of any new controls on the affected facilities, or require reductions in emissions. Title V does enhance public and EPA

[13] California Air Resources Board (ARB). 2024. Stationary Diesel ATCM. Website: https://ww2.arb.ca.gov/our-work/programs/stationary-diesel-atcm. Accessed April 17, 2025.

[14] California Air Resources Board (ARB). 2008. ATCM to Limit Diesel-fueled Commercial Motor Vehicle Idling. Website: https://www.arb.ca.gov/regact/idling/idling.htm. Accessed April 21, 2025.

[15] California Air Resources Board (ARB). 2024. In-use Off-road Diesel-fueled Fleets Regulation. Website: https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation. Accessed April 17, 2025.

[16] California Air Resources Board (ARB). 2024. Community Air Protection Program. Website: https://ww2.arb.ca.gov/capp. Accessed April 17, 2025.

[17] Bay Area Air Quality Management District (Bay Area Air District). 2024. Community Health Protection Program. Website: https://www.baaqmd.gov/community-health/community-health-protection-program. Accessed April 17, 2025.

participation in the permitting process and requires additional record keeping and reporting by businesses, which results in significant administrative requirements.

Regional

San Joaquin Valley Air Pollution Control District

The SJVAPCD is responsible for controlling emissions primarily from stationary sources within the San Joaquin Valley. The SJVAPCD, in coordination with the eight countywide transportation agencies, is also responsible for developing, updating, and implementing air quality attainment plans for the SJVAB. The SJVAPCD also has roles under CEQA.

The SJVAPCD attains and maintains air quality conditions in the SJVAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The clean air strategy of the SJVAPCD includes preparation of plans for attainment of ambient air quality standards, adoption and enforcement of rules and regulations concerning sources of air pollution, and issuance of permits for stationary sources of air pollution. The SJVAPCD also inspects stationary sources of air pollution and responds to citizen complaints; monitors ambient air quality and meteorological conditions; and implements programs and regulations required by the federal CAA and CCAA.

The SJVAPCD has adopted developed numerous plans to identify measures needed to attain the increasingly stringent federal and State standards.[18] Most recently adopted plans include the following:

- The 2024 Plan for the 2012 Annual $PM_{2.5}$ Standard.
- The 2018 Plan for the 1997, 2006, and 2012 $PM_{2.5}$ Standard.
- Ozone Contingency Measure State Implementation Plan Revision for the 2008 and 2015 8-Hour Ozone Standards.
- 2022 Plan for the 2015 8-hour Ozone Standard.
- The 2004 Revisions to the Carbon Monoxide Maintenance Plan.

San Joaquin Valley Air Pollution Control District Rules and Regulations

The SJVAPCD Rules and Regulations that may apply during buildout of the proposed project include, but are not limited to the following:

Rule 4102 Nuisance

The purpose of this rule is to protect the health and safety of the public and applies to any source operation that emits or may emit air contaminants or other materials.

[18] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2025. Air Quality Attainment Plans. Website: https://www.valleyair.org/rules-and-planning/air-quality-plans/. Accessed June 25, 2025.

Rule 4601 Architectural Coatings

The purpose of this rule is to limit volatile organic compounds (VOC) emissions from architectural coatings. Emissions are reduced by limits on VOC content and providing requirements on coatings storage, cleanup, and labeling.

Rule 4641 Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations

The purpose of this rule is to limit VOC emissions from asphalt paving and maintenance operations.

If asphalt paving would be used, then the paving operations would be subject to Rule 4641.

Rule 4702 Internal Combustion Engines

This rule applies to any internal combustion engine rated at 25 brake horsepower or greater. Emergency generators cannot be used to reduce the demand for electrical power when normal electrical power line service has not failed, to produce power for the utility electrical distribution system, or in conjunction with a voluntary utility demand reduction program or interruptible power contract. The rule limits emergency generators to 100 hours of operation for non-emergency usage, which is less stringent than the ATCM for emergency standby stationary engines under 17 California Code of Regulations (CCR) 93115. Therefore, compliance with the ATCM ensures compliance with the 100-hour requirement**.**

Regulation VIII Fugitive PM_{10} Prohibitions

Rules 8011-8081 are designed to reduce PM_{10} emissions (predominantly dust/dirt) generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and track out, etc. All development projects that involve soil disturbance are subject to at least one provision of the Regulation VIII series of rules.

Rule 9410 Employer Based Trip Reduction

The purpose of Rule 9410 is to reduce emissions of ozone precursors (NO_X and VOC) and PM from mobile sources. The rule applies to employers with at least 100 eligible employees at a worksite and requires employers to establish an Employer Trip Reduction Implementation Plan (eTRIP) to encourage employees to reduce single-occupancy vehicle trips, thus reducing pollutant emissions associated with work commutes. Rule 9410 (Employer Based Trip Reduction) satisfies a federally-enforceable commitment in District State Implementation Plans (the 2007 Ozone Plan and the 2008 $PM_{2.5}$ Plan) and is designed to share the air pollution cleanup

burden traditionally targeted at stationary sources. The rule applies to worksites with over 100 employees in incorporated cities with a population of at least 10,000 people OR worksites where at least 50 percent of all employees work at least 2,040 hours per year.

Rule 9510 Indirect Source Review

The purpose of Rule 9510 is to reduce emissions of NO_X and PM_{10} from new development projects. The rule applies to development projects that, upon full buildout, seek to gain discretionary approval for any one of the following: 50 residential units, 2,000 square feet of commercial space, 25,000 square feet of Light Industrial (LI) space, 20,000 square feet of medical or recreational space, 39,000 square feet of general office space, 100,000 square feet of heavy industrial space, 9,000 square feet of educational space, 10,000 square feet of government space, or 9,000 square feet of any land use not identified above. Several sources are exempt from the rule, including transportation projects and transit projects (exempt only from Rule 9510 Section 6.2 and Section 7.1.2), reconstruction projects that result from a natural disaster, and development projects whose primary source of emissions are subject to SJVAPCD Rules 2201 and 2010, which address stationary sources. Any development project that has a mitigated baseline of less than 2 tons per year (tpy) for NO_X and PM_{10} is also exempted from the mitigation requirements of the rule. Developers are encouraged to reduce as much air pollution as possible through on-site mitigation or the incorporation of air-friendly designs and practices into the project. Some examples include bike paths and sidewalks; traditional street design; medium- to high-density residential developments; locating near bus stops and bike paths; locating near different land use zones, such as commercial; and increasing energy efficiency. If these practices do not completely meet the required reductions (under the rule), new development projects are required to mitigate the remainder of their emissions by contributing to a mitigation fund that would be used to pay for the most cost-effective projects to reduce emissions. Examples include projects to retire or crush polluting cars, replace older diesel engines, and replace gas-powered lawnmowers with electric lawnmowers.

The Indirect Source Review (ISR) requires developers to reduce 20 percent of construction exhaust NO_X; 45 percent of construction exhaust PM_{10}; 33 percent of operational NO_X over 10 years; and 50 percent of operational PM_{10} over 10 years.

Asbestos Dust Mitigation Plan

An Asbestos Dust Mitigation Plan is required for grading/construction projects which involve the disturbance of asbestos-containing soil in areas greater than 1 acre. This is different from the District's Dust Control Plan that is implemented as part of Regulation VIII.

Rule 4002 NESHAPS Asbestos Regulation

This rule requires that the subject facilities be inspected for asbestos prior to remodeling. Regulated asbestos-containing materials (RACM) must be removed prior to remodeling work. Furthermore, a demolition permit release is required prior to obtaining a building department demolition permit.

The SJVAPCD also provides guidance and thresholds for CEQA air quality and greenhouse gas (GHG) emissions analyses. The result of this guidance, as well as State regulations to control air pollution, is an overall improvement in the SJVAB. In particular, the SJVAPCD's 2015 Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI) states the following:[19]

1. The SJVAPCD's Air Quality Attainment Plans include measures to promote air quality elements in county and city general plans as one of the primary indirect source programs. The general plan is the primary long-range planning document used by cities and counties to direct development. Since air districts have no authority over land use decisions, it is up to cities and counties to ensure that their general plans help achieve air quality goals. Section 65302.1 of the California Government Code requires cities and counties in the San Joaquin Valley to amend appropriate elements of their general plans to include data, analysis, comprehensive goals, policies, and feasible implementation strategies to improve air quality in their next housing element revisions.
2. The Air Quality Guidelines for General Plans (Air Quality Guidelines), adopted by the SJVAPCD in 1994 and amended in 2005, is a guidance document containing goals and policy examples that cities and counties may want to incorporate into their General Plans to satisfy Section 65302.1. When adopted in a general plan and implemented, the suggestions in the Air Quality Guidelines can reduce vehicle trips and miles traveled and improve air quality. The specific suggestions in the Air Quality Guidelines are voluntary. The SJVAPCD strongly encourages cities and counties to use their land use and transportation planning authority to help achieve air quality goals by adopting the suggested policies and programs.

Local

City of Clovis General Plan

The City of Clovis General Plan (General Plan) includes several policies that are relevant to air quality.[20] Transportation-related goals are relevant to air quality because reductions in Vehicle Miles Traveled (VMT) have a positive effect on air quality. General Plan goals and policies applicable to the proposed project are identified below:

[19] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. Website: https://ww2.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed April 17, 2025.

[20] City of Clovis. 2014. City of Clovis General Plan. Air Quality Element. August. Website: https://www.clovisca.gov/planning-and-development/planning/master-plans/general-plan/air-quality-element/. Accessed February 13, 2025.

Circulation Element

Goal 1 A context-sensitive and "complete streets" transportation network that prioritizes effective connectivity and accommodates a comprehensive range of mobility needs.

Air Quality Element

Goal 1 A local environment that is protected from air pollution and emissions.

Policy 1.1 Land use and transportation. Reduce greenhouse gas and other local pollutant emissions through mixed use and transit-oriented development and well-designed transit, pedestrian, and bicycle systems.

Policy 1.2 Sensitive Land Uses. Prohibit, without sufficient mitigation, the future siting of sensitive land uses within the distances of emission sources as defined by the California Air Resources Board.

Policy 1.3 Construction activities. Encourage the use of best management practices during construction activities to reduce emissions of criteria pollutants as outlined by the San Joaquin Valley Air Pollution Control District (SJVAPCD).

Policy 1.4 City buildings. Require that municipal buildings be designed to exceed energy and water conservation and greenhouse gas reduction standards set in the California Building Code.

Policy 1.5 Fleet operations. Purchase low- or zero-emission vehicles for the City's fleet where feasible. Use clean fuel sources for City-owned mass transit vehicles, automobiles, trucks, and heavy equipment where feasible.

Policy 1.6 Alternative fuel infrastructure. Encourage public and private activity and employment centers to incorporate electric charging and alternative fuel stations.

Policy 1.7 Employment measures. Encourage employers to provide programs, scheduling options, incentives, and information to reduce vehicle miles traveled by employees.

Policy 1.8 Trees. Maintain or plant trees where appropriate to provide shade, absorb carbon, improve oxygenation, slow stormwater runoff, and reduce the heat island effect.

Goal 2 A region with healthy air quality and lower greenhouse gas emissions.

Policy 2.1 Regional coordination. Support regional efforts to reduce air pollution (criteria air pollutants and greenhouse gas emissions) and collaborate with other agencies to improve air quality at the emission source and reduce vehicle miles traveled.

Policy 2.2 Cross-jurisdictional issues. Collaborate with regional agencies and surrounding jurisdictions to address cross-jurisdictional transportation and air quality issues.

Policy 2.3 Valley wide programs. Establish parallel air quality programs and implementation measures with other communities across the San Joaquin Valley.

Policy 2.4 Public participation. Encourage participation of local citizens, the business community, and interested groups and individuals in air quality planning and implementation.

Policy 2.5 Public education. Promote programs that educate the public about regional air quality issues and solutions.

Policy 2.6 Innovative mitigation. Encourage innovative mitigation measures to reduce air quality impacts by coordinating with the SJVAPCD, project applicants, and other interested parties.

3.3.5 - Methodology

Model Selection, Modeling Parameters and Assumptions

The California Emissions Estimator Model (CalEEMod), Version 2022.1.1, was used to calculate and assess air pollutant emissions from the Vista Ranch Development/Master Plan (MP) Area 1, which comprises on-site and off-site construction activities and long-term operational emissions generated from all facets of the Vista Ranch Development. CalEEMod provides a uniform platform for government agencies, land use planners, and environmental professionals to calculate and estimate emissions from land use development projects in California. Appendix D includes a detailed description of model inputs used in the analysis, while a high-level summary of the major sources of construction and operational emissions that would occur are summarized below.

The emissions impacts associated with the implementation of the SOI Expansion and Non-development Area and MP Area 2 are addressed qualitatively in Section 3.3.6 below.

Criteria Pollutants Assessed

The following air pollutants are assessed in this analysis:

- ROG
- NO_X
- CO
- SO_2
- PM_{10}
- $PM_{2.5}$

Note: The proposed project would emit O_3 precursors (ROG and NO_X). However, the proposed project would not directly emit O_3, as this is formed in the atmosphere during the photochemical reaction of these precursors.

Toxic Air Contaminants Assessed

The following TACs are assessed in this analysis:

- DPM

Model Inputs and Assumptions–Construction

Construction activities would consist of demolition, site preparation, grading, building construction, paving, and architectural coating of the inside and outside of the buildings. Descriptions of the construction schedule, sources of emissions, equipment used, and the nature of the activities are described below. Additionally, more detailed assumptions are available in Appendix D.

Construction Emissions

Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of activity, and prevailing weather conditions. Construction emissions result from on-site and off-site activities. On-site emissions principally consist of emissions from the activity of light and heavy-duty construction equipment, motor vehicle operation, and fugitive dust (PM_{10} and $PM_{2.5}$) from disturbed soil. Additionally, paving operations and application of architectural coatings would release VOC emissions. Off-site emissions are caused by motor vehicle exhaust from delivery vehicles, haul trucks, worker traffic, and road dust (PM_{10} and $PM_{2.5}$).

Construction Schedule

For air quality modeling purposes, the construction of the Vista Ranch Development was assumed to begin in May 2026 and would occur in six phases for a total of approximately 10 years. While it is anticipated that construction would begin approximately 1 year after project approval, modification of the construction schedule would have no effect on the total emissions that would be generated by the proposed project's construction, nor does it have any effect regarding the calculation of average emissions per day or per year (as determined pursuant to SJVAPCD methodology). Although it does not form the basis of the evaluation or conclusion in this document, the City also notes that it is reasonable to assume that future improvements in technology would be incorporated into regulatory requirements. Accordingly, should the construction schedule move to later years or take longer, construction emissions would be expected to decrease because of mandatory compliance with improvements in technology and more stringent regulatory requirements that would affect future construction equipment and fuels. (Therefore, the analysis represents a worst-case, conservative approach.)

Construction emissions were estimated based on applicant-provided information for the development of the Vista Ranch Development. The construction of single-family homes, multi-family homes, a community recreation center, commercial development, and several parks would occur in six phases as described in Table 3.3-6. Off-site improvements were also assigned to the six phases.

Table 3.3-6: Vista Ranch Development Construction Phasing Assumptions

Phase	Residential Land Uses	Off-Site Improvements	Land Development. Start Date	Vertical Development. Start Date	Duration
1	Demolition of existing structures 448 single-family homes 1-acre park	Shepherd Avenue–from west property line to Fowler Avenue 520 lineal feet sewer	May 2026	Dec 2026	36 months
2	448 single-family homes 4,000-square-foot community center 2.7-acre park		May 2028	Dec 2028	24 months
3	244 single-family homes 85,000-square-foot commercial site		May 2030	Dec 2030	36 months
4	453 single-family homes 233 multi-family units	Behymer Ave–from west property line to Fowler Avenue; water in Behymer from Fowler to Sunnyside; sewer in Perrin to Fowler; sewer in Fowler from Perrin to Shepherd	May 2031	Dec 2031	36 months
5	470 single-family homes 3.32-acre park	Perrin Avenue–west property line to Fowler Avenue	May 2033	Dec 2033	24 months
6	131 single-family homes 291 multi-family units 1-acre park		May 2034	Dec 2034	30 months

Notes:
Duration assumptions were adjusted to reflect overlap in phases.
Each phase includes site preparation, grading, building, architectural coatings, and paving (if roadway improvements are applicable).
Source: Appendix D

Construction Equipment

A summary of the types of off-road construction equipment usage and assumptions used to estimate emissions presented in Appendix D. CalEEMod defaults were used to assign the equipment types, numbers and hours per day based on the construction acreage. The number of pieces of equipment was adjusted when the anticipated days of vertical construction were less than indicated by CalEEMod defaults in order to conserve the equipment operating hours. For example, the Phase 1 building (vertical) construction duration was modeled as 555 days, whereas CalEEMod default for

building construction activities for sites between 50 and 75 acres is 1,110 days. Accordingly, the pieces of equipment required for construction were doubled in the modeling after the CalEEMod days were adjusted. For some activities, the modeled phase durations were longer than the assigned CalEEMod defaults. However, no reductions in equipment numbers were made, instead leaving the project emission modeling as a conservative estimate, compared to defaults. This approach was utilized for the architectural coating activities, which were assigned to occur over half of the building construction duration during each of the phases.

The analysis utilized CalEEMod default horsepower and load factors for off-road equipment, unless indicated otherwise. Off-road equipment is modeled using the "Average" option which uses Statewide average fleetwide emission factors from ARB's ORION model for the project construction year.

Construction Activities

Demolition

Demolition activities would occur during Phase 1 only. During demolition activities, emissions are primarily generated from the use of heavy-duty off-road equipment, such as excavators, bulldozers, and loaders, as well as from material handling and debris hauling. These sources contribute to criteria pollutants, including NO_X, PM_{10} and $PM_{2.5}$, CO, and ROG. CalEEMod quantifies demolition emissions by factoring in equipment horsepower, usage hours, and fuel type, along with fugitive dust from material movement and on-road vehicle trips. Details of additional calculations are noted in the CalEEMod reports in Appendix D.

Site Preparation and Grading

During site preparation and grading/excavation activities, fugitive dust can be generated from the movement of soil in MP Area 1. CalEEMod estimates dust from earth movement, from graders or other construction equipment leveling the land, and from loading or unloading soil into haul trucks. Each activity is calculated differently in CalEEMod, based on the number of acres traversed by the grading equipment.

Every project within the SJVAPCD's jurisdiction is required to comply with the requirements of the SJVAPCD's Rules under Regulation VIII (Fugitive PM_{10} Prohibitions). Rule 8011 requires actions to prevent, reduce, or mitigate anthropogenic fugitive dust emissions during fugitive dust generating activities, including water exposed areas.

Hauling would be required to export material to/from MP Area 1, and vendor haul trips were adjusted accordingly, as noted in Appendix D.

Building Construction

During building construction activities, on-site emissions are primarily from the off-road construction equipment and calculated using the equipment specified along with the ARB Off-Road Emission and Load Factors, the number of construction days, and hours of operation per day.

Architectural Coating and Paving

ROG emissions are calculated using CalEEMod defaults which account for VOC coating limits as specified by SJVAPCD. ROG emissions for paving are calculated only for areas specified as asphalt paving, which includes residential drives and roadways.

Off-site Construction Vehicles

A summary of the construction-related vehicle trips for each construction phase is available in Appendix D. Note that the total number of construction trips would not necessarily occur on the same day because construction activities would vary each day during the construction period. The number of construction-related vehicle trips will vary from phase-to-phase. Appendix D includes the maximum number of construction trips for each construction phase by vendor and worker, on-site and across all construction activities.

Mitigation Measures for Construction

Emissions modeling was performed for an unmitigated case only, based on Statewide average emission factors which represent off-road fleets that become increasingly cleaner each year as a result of the In-use Off-road ATCM.

Model Inputs–Operation

Operational activities associated with the Vista Ranch Development would result in emissions of criteria pollutants and/or TACs. Operational emissions are expected to occur from the following sources:

- Area Sources
- Energy Sources
- Mobile Sources

Area Sources

Architectural Coatings

Area source emissions include occasional architectural coating activities for repainting of buildings associated with the proposed project. These activities produce emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings. CalEEMod assumes that repainting occurs at a rate of 10 percent of the buildings per year.

Consumer Products

Other area source emissions include consumer products such as (but not limited to) detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds when released in the atmosphere and can react to form O_3 and other photochemically reactive pollutants. The emissions associated with these consumer products were calculated based on CalEEMod defaults.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, grinders, trimmers, and chain saws used to maintain the landscaping of the proposed project. As stated under the Regulatory Framework, AB 1346 aims to ban the sale of new gasoline powered equipment under 25 gross hp (known as Small Off-road Engines [SOREs]) by 2024. For purposes of this analysis, landscape maintenance equipment emissions were zeroed out.

Energy

Within CalEEMod, building electricity and natural gas use is divided into two categories: (1) end uses subject to Title 24 standards, and (2) end uses not subject to Title 24 standards. The distinction is required to enable accurate calculation of several energy sector reduction measures.

Electricity

Subject to Title 24 includes space heating, cooling, ventilation, water heating, outdoor lighting, and the majority of indoor lighting, while electricity ***not*** subject to Title 24 includes all other end uses. Non-Title 24 electric end uses include cooking appliances, clothes washers, electric dryers, refrigeration, office electronics, electric pool/spa heating, well pumping, fans, miscellaneous plug-in uses, and the remainder of indoor lighting.

Natural Gas

Subject to Title 24 includes space heating and water heating while Natural Gas ***not*** subject to Title 24 includes all other end uses. Examples of Non-Title 24 end uses are range/oven, dryer, pool/spa heating, and other miscellaneous uses.

As previously stated, the Vista Ranch Development would be all-electric by design, and there would be no emissions from combustion of natural gas for building energy. Additional Title 24 and Non-Title 24 energy was calculated to account for replacing natural gas end uses with additional electricity.

Mobile Sources

Motor vehicle emissions refer to exhaust and road dust emissions from the motor vehicles that would travel to and from and within MP Area 1. The Vista Ranch Development's operational-related air quality emissions from vehicle trips would be those generated by residents, customers and employees traveling to and from MP Area 1.The proposed project would include the development of residential and commercial uses and is, therefore, not anticipated to be associated with HHDT travel. The following describes the methods utilized to determine the trip generation, the trip lengths (distances traveled), the fleet mix, and the emission rates associated with the category of vehicles in the fleet mix.

Passenger Vehicles–Regional Emissions

To determine regional emissions from passenger car vehicles, the Vista Ranch Development mobile sources were assessed according to the trip generation rates from the supplemental traffic study prepared by Peters Engineering Group in September 2025, Supplemental Traffic Analyses Proposed

Vista Ranch Project.[21] Emissions were calculated using the trip rates from the traffic study combined with trip distances and vehicle emission factors. Emission factors contained within CalEEMod 2022.1 were derived from EMFAC2021 v.1.0.1 model for Fresno County. Residential and nonresidential vehicle trips were derived from the traffic study. Trip lengths were derived from CalEEMod. Assumptions used to estimate emissions include:

- Residential Trips: 24,225 daily residential trips with an average trip length of 6.82 miles.
- Nonresidential Trips: 5,864 daily nonresidential trips with an average trip length of 8.07 miles.
- The County average fleet mix for the first operational year (2036) was used to model the vehicle mix of trips generated. This includes a mixture of passenger vehicles, motorcycles, and motor homes, as well as small percentages of medium and heavy-duty vehicles and buses, in the relative proportions present on the roadways.

According to the traffic study, the Vista Ranch Development is anticipated to result in 30,089 total daily trips.

Passenger Vehicles–Local Emissions (AAQA Analysis)

As noted in the impact discussion below, an AAQA was prepared because the localized operational-related emissions exceed the SJVAPCD screening thresholds of 100 pounds per day (lb/day) for any criteria pollutant. [22] The AAQA was conducted in accordance with SJVAPCD Policy APR 1925 (APR 1925), and evaluated all project-related operational sources (which include passenger vehicles) within the project boundary, as well as the project-related mobile emissions within 0.25 mile of the project boundary.

To determine localized emissions from passenger car vehicles, the Vista Ranch Development mobile sources were divided into on-site (within the project boundary) and off-site (occurring within 0.25 mile of the project boundary) sources. Assumptions used to estimate emissions include:

- On-site emissions from passenger vehicles were derived by dividing the Vista Ranch Development into six area sources (matching the phase areas as defined by the construction phases). Each phase was modeled in CalEEMod (according to the land uses defined in each construction phase) with trip rates consistent with the traffic study. On-site trip lengths were assumed as 0.75 mile for residential and nonresidential trips in Phase 1–3 Development Areas and 1.25 miles for Development Areas 4, 5, and 6. Default CalEEMod emission factors were utilized to estimate criteria pollutant emissions except road dust. A road silt loading emission factor of 0.0035 g/m^2 was conservatively used to estimate road dust from residential roads.[23]

[21] Peters Engineering Group. 2025. Supplemental Traffic Analyses Proposed Vista Ranch Project. September 12.

[22] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2018. APR-2030 Project Ambient Air Quality Analysis Applicability Determination under CEQA. June 12. Website: https://www.valleyair.org/media/bo3hz35n/apr-2030.pdf. Accessed November 4, 2025.

[23] Fresno Council of Governments (Fresno COG). 2022. Conformity Analysis for the 2023 Federal Transportation Improvement and the 2022 Regional Transportation Plan. July 28. Website: https://www.fresnocog.org/wp-content/uploads/2022/11/FCOG-2022-RTP-2023-FTIP-Conformity-Analysis-with-board-reso-revised-10-13-22.pdf. Accessed November 4, 2025.

Each phase includes emissions from starts and stops and running exhaust associated with the vehicle trips from that phase (i.e., "neighborhood") rather than attributing all trips to the entire Vista Ranch Development.

- Off-site emissions from vehicles were derived from the traffic study and account for the emissions occurring within 0.25 mile of the project boundary. The number of trips was calculated at seven intersections surrounding the project boundary (intersections 29, 30, 31, 36, 39, 43, and 44). Peak hourly vehicle counts were calculated from turning movements and were used to determine approach and departure volumes. The peak hourly trips were then assigned to 11 roadway segments reflecting northbound, southbound, eastbound, or westbound (or combined) travel. The peak hourly trips were adjusted by using a ratio of 1.2 to account for total development trips since the peak hourly volumes in the traffic study were for residential trips only. The roadway segments ranged in length from 0.23 to 0.50 mile and included 31 to 367 peak-hour trips per segment. Emissions for each segment were calculated using emission factors derived from EMFAC2021 v.1.0.2 ONROAD model for the County. The fleet mix was assumed as aggregate (which assumes that a mix of vehicles—specific to the County—across all vehicle categories ranging from light-duty passenger vehicles to HHDT would be traveling along the modeled roadway segments). Paved road dust emission factors were calculated with county-specific values for County arterials roadways consistent with those used in regional emissions analyses used by Fresno Council of Governments (Fresno COG) for their conformity analysis from the 2022 RTP.[24] Emissions include exhaust, brake wear, tire wear, and re-entrained road dust. Exhaust emissions on-site include starts and idling.

Additional modeling details and assumptions are included in Appendix D.

Fugitive Dust Related to Paved Road Vehicular Travel

Paved road dust emission factors for all construction-related travel conservatively maintained use of CalEEMod default emission factors based on a default roadway silt loading. Regional and off-site particulate matter emissions from paved road travel were calculated by replacing CalEEMod default roadway silt loadings with county-specific values for the County for arterials and collector roadways consistent with those used in regional emissions analyses used by Fresno COG for their conformity analysis from the 2022 RTP.[25] The details of the County-specific silt loadings and paved roadway dust factor are included in Appendix D.

Stationary Sources

The Vista Ranch Development is not anticipated to include the installation of any stationary sources of emission, such as emergency generators or diesel-fueled fire pumps, and, therefore, those are not included in the emissions calculations and modeling.

[24] Fresno Council of Governments (Fresno COG). 2022. Conformity Analysis for the 2023 Federal Transportation Improvement and the 2022 Regional Transportation Plan. July 28. Website: https://www.fresnocog.org/wp-content/uploads/2022/11/FCOG-2022-RTP-2023-FTIP-Conformity-Analysis-with-board-reso-revised-10-13-22.pdf. Accessed November 4, 2025.

[25] Ibid.

Mitigation Measures for Operation

Emissions modeling was performed for an unmitigated case only. Measure E-15, Require All Electric Development, was not selected, but instead natural gas usage was zeroed out on the CalEEMod input screen and replaced with the additional electricity quantity needed to replace the most common natural gas end uses (building and water heater, cooking) using methods outlined in the California Air Pollution Control Officers Association (CAPCOA) handbook for Measure E-15. Calculations showing the additional Title 24 and non-Title 24 electricity added to the CalEEMod defaults are included in Appendix D.

Health Risk Assessment for TACs

An HRA was prepared to evaluate potential health risks to on- and off-site receptors during construction of the Vista Ranch Development. The methodologies used to evaluate emissions for the Vista Ranch Development are based on the most recent SJVAPCD Modeling and Health Risk Assessment Guidelines, the SJVAPCD APR 1906 Framework for Performing Health Risk Assessments and guidance from the OEHHA. The HRA conducted for this analysis evaluates the estimated cancer risk, non-cancer chronic hazard index (HIC), and acute hazard index (HIA) associated with construction of the Vista Ranch Development to address the SJVAPCD Significance Thresholds.

The primary TAC of concern would be diesel exhaust, characterized by the emissions of DPM as a surrogate, emitted during construction. The emissions of potential DPM associated with construction activities would be transient and temporary and would occur in varying locations within MP Area 1. The exposure assessment for construction is limited to emissions over the time that construction is expected to occur.

The HRA evaluated construction-related emissions and the associated cancer and chronic hazard risks at on-site and off-site residential receptors and the future school within the MP Area 2. The HRA evaluated a worst-case scenario for on-site receptors. This scenario would assume that a person could occupy a residence constructed during Phase 1; in this scenario, that resident would be exposed to all remaining phases of construction. Off-site receptors include existing residences within 1,000 feet of MP Area 1's boundary. There are no existing schools identified within 1,000 feet of the proposed project. While the focus of the quantitative HRA is the Vista Ranch Development (and not MP Area 2 or the SOI Expansion and Non-development Area, which are addressed qualitatively below), the HRA did account for the potential for a new school to be constructed in the MP Area 2 during construction of the Vista Ranch Development (which is an unlikely, worst-case scenario). Therefore, the HRA also evaluated the potential health risks to children at the newly built school that may be exposed during Vista Ranch Development construction.

The HRA consists of three steps:

- Identify and quantify TAC emission sources,
- Use a dispersion model to translate these emissions to concentrations of the TACs at specific on-site and off-site locations (called receptors), and

- Perform an exposure assessment based on these concentrations and exposure parameters.

The results of the HRA are compared to health specific thresholds of significance as defined by SJVAPCD in the analysis below. The risks and hazards are modeled for a baseline or unmitigated scenario.

Emissions Identification and Quantification

Construction

Sources of TAC emissions from construction include DPM exhaust from on-site off-road construction equipment exhaust and from off-site roadway emissions of diesel-fueled trucks. The off-site emissions from trucks are only included for the emissions on roadways within 1,000 feet of the site. Specifically, the modeled road segment includes trucks traveling along East Shepherd Avenue. DPM emissions were calculated for all phases of construction. PM_{10} exhaust emissions are used as a surrogate for DPM.

Air Dispersion Modeling

An air dispersion model is a mathematical formulation used to estimate air quality impacts at specific locations (receptors) surrounding a source of emissions given the rate of emissions and prevailing meteorological conditions. The air dispersion model applied in this assessment was the American Meteorological Society/EPA Regulatory Model (AERMOD), Version 24142, which is approved by the SJVAPCD for air dispersion assessments. Specifically, the AERMOD model was used to estimate ambient air concentrations of DPM at sensitive receptor locations from diesel construction PM_{10} exhaust emissions (PM_{10} is used as a surrogate for DPM). AERMOD provides a refined methodology for estimating localized construction impacts by utilizing long-term, measured representative meteorological data for MP Area 1.

Terrain elevations were obtained for the Master Plan Area using United Stated Geology Survey (USGS) 1/3 arc-second Digital Elevation Models (DEMs) DEMs processed by the EPA Terrain Preprocessor (AERMAP) model, the AERMOD terrain data preprocessor. The rural dispersion option was used to describe air dispersion in the local vicinity of the Master Plan Area. The air dispersion model assessment utilized 5 years (2018–2022) of SJVAPCD-preprocessed meteorological data for the Fresno Station (WBAN 9313) which is the closest and most representative data for the Master Plan Area.

The AERMOD model was used to estimate concentrations of air emissions at sensitive receptor locations from construction activities. A grid was superimposed over the Master Plan Area to allow for identification of the maximum impact at on-site and off-site receptors. Off-site receptor locations within the AERMOD model were placed at locations of existing residences and worker establishments surrounding MP Area 1 (within a 1,000-foot boundary). In addition, residential receptors were placed in Phase 1, and a school receptor was placed in MP Area 2 to reflect the worst-case scenario described above. All receptors were placed conservatively at ground level.

DPM concentrations were estimated at receptor points resulting from the estimated DPM construction emissions. The modeling assumed the net working days of construction as defined in the construction

schedule above (by phase). The modeled hours include the number of working days of construction per phase multiplied by 8. As stated, the modeling included emissions from on-site, off-road diesel-fueled construction equipment, as well as the emissions from trucks traveling on East Shepherd Avenue within 1,000 feet of the site. Construction exhaust was modeled as an area source. The release parameters for construction equipment DPM exhaust are consistent with SJVAPCD recommendations (2008) for gaseous exhaust from construction equipment. Parameters calculated per the EPA Haul Road Workgroup Final Report released on March 2, 2012, suggest the use of Adjacent Volume Sources to represent the East Shepherd Avenue truck emissions. Construction equipment exhaust emissions were derived from CalEEMod (Appendix D). Emissions are modeled in AERMOD as 1 grams per second (g/s) and emission rates for DPM were entered in Hotspots Analysis and Reporting Program Version 2 (HARP2) for each source as described below.

Exposure Assessment

Estimation of Cancer Risks

Cancer risks are estimated as the upper-bound incremental probability that an individual would develop cancer as a direct result of exposure to potential carcinogens over a specified exposure duration. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). Cancer risk is expressed in terms of risk per 1 million exposed individuals. A risk level of 10 in a million implies a likelihood (or risk) that up to 10 persons out of 1 million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of TACs over a specified duration of time. This risk would be an excess cancer risk that is in addition to any environmental cancer risk borne by a person not exposed to these TACs.

The health risks associated with the exposure to these concentrations are then calculated for each individual receptor based on dose and response parameters. Factors such as an individual's age and body weight and breathing rate determine the dose. Individuals also have varying responses for a number of factors, with children being more susceptible to health effects due to development. OEHHAs Risk assessment procedures were modified in 2015[26] to account for early childhood health effects and age sensitivity factors are applied to the cancer health risk values. An age sensitivity factor of 10 is applied for infants with exposure starting in the third trimester until age 2. Children ages 2 to 16 are assumed to be 3 times more sensitive than adults. No adjustments are made for adult exposure for ages greater than 16. OEHHA Health Risk assessment protocols specify HRAs for residential exposure should start with exposure starting at the third trimester of pregnancy and this approach is used for both the Construction and Operational HRA for the proposed project.

The analysis utilized SJVAPCD policies for HRAs[27] utilizing the OEHHA derived approach for evaluating risk at an individual receptor based on a 70-year exposure residential exposure starting in

[26] California Office of Environmental Health Hazard Assessment (OEHHA). 2015. Risk Assessment Guidelines Guidance Manual for Preparation of Health Risk Assessments. February. Website: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed April 16, 2025.

[27] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. APR-1906. Framework for Performing Health Risk Assessments. June 30. Website: https://ww2.valleyair.org/media/0shm0mlk/apr-1906.pdf. Accessed November 4, 2025.

the third trimester over a 70-year averaging period. As per the SJVAPCD policy, there is no use of spatial averaging, breathing rates of less than 95 percent for all receptors, or reductions in exposure times. Specifically, the HARP2 tool option to apply a "fraction of time at residence" to ages bins greater than or equal to 16 years which is enabled by default, is unselected for performing the HRA. Exposure time and worker adjustments were implemented for the construction HRA consistent with Tier 3 policy implementation. The duration of the exposure was limited to the entire construction duration of 10.5 years for off-site residential and worker receptors, 8 years for on-site residential receptors (phases 2–6), and 8 years for student receptors (age span of 3–11, representing attendance at the elementary school for Preschool–Grade 6). All residential exposure was conservatively assumed to start during the third trimester of pregnancy according to SJVAPCD policies.

Worker exposures and risks were also calculated using SJVAPCD policies, which differ from OEHHA Tier 1 guidance and HARP2 defaults. Worker exposure is based on OEHHA-derived 95th percentile rates and 10.5 years of exposure (entire construction period) beginning at age 16.

Estimation of Chronic Non-Cancer Health Effect

An evaluation of potential non-cancer effects of chronic chemical exposures was also conducted.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of the project's emissions to a concentration considered acceptable to public health professionals, termed the Reference Exposure Level (REL). The HI assumes that chronic exposures to TACs adversely affect a specific organ or organ system (toxicological endpoint) of the body. For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the HI, each chemical concentration or dose is divided by the appropriate toxicity REL. For compounds affecting the same toxicological endpoint, this ratio is added together. Where the total equals or exceeds 1, a health hazard is presumed to exist.

To quantify non-carcinogenic impacts, the chronic HI is derived by using the annual average concentration of TAC as derived from the air dispersion model ($\mu g/m^3$). This value is then compared to the REL above which a significant impact is assumed to occur ($\mu g/m^3$).

The OEHHA has defined a REL for Diesel Exhaust of 5 $\mu g/m^3$. The principal toxicological endpoint assumed in this assessment was the respiratory system via the inhalation exposure pathway. DPM does not have any identified short-term or acute RELs.

Estimation of Acute Non-cancer Health Effect

The proposed project's non-cancer acute health risks were not estimated because OEHHA has not established an acute REL for DPM and there are no acute non-cancer risk values associated with DPM.

3.3.6 - Project Impacts and Mitigation Measures

The CEQA Guidelines define a significant effect on the environment as "a substantial, or potentially substantial, adverse change in the environment." To determine whether a project would have a significant impact on air quality, the type, level, and impact of emissions generated by the proposed project must be evaluated with respect to the lead agency's thresholds.

Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to air quality are significant environmental effects. Would the proposed 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 nonattainment under an applicable federal or State Ambient Air Quality Standard.

c) Expose sensitive receptors to substantial pollutant concentrations.

d) Create objectionable odors affecting a substantial number of people.

For air quality and GHG emissions, the City relies on guidance established by the SJVAPCD to evaluate project impacts. The SJVAPCD provides region-specific screening levels, emission thresholds, and methodologies for evaluating potential impacts from construction and operational activities. The SJVAPCD's quantitative air pollution significance thresholds are summarized below in Table 3.3-7.

Table 3.3-7: San Joaquin Valley Air Pollution Control District Significance Thresholds

Pollutant	Construction Thresholds (TPY)	Operational Thresholds (TPY)	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
ROG	10	10	10
NOX	10	10	10
CO	100	100	100
SOX	27	27	27
PM_{10}	15	15	15
$PM_{2.5}$	15	15	15

Pollutant	Construction Thresholds (TPY)	Operational Thresholds (TPY)	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities

Notes:
CO = carbon monoxide
NO_X = oxides of nitrogen
PM_{10} = particulate matter with aerodynamic diameter less than 2.5 microns
$PM_{2.5}$ = particulate matter with aerodynamic diameter less than 10 microns
ROG = reactive organic gases
SO_X =sulfur oxides
TPY = tons per year

Source: San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impact.

The SJVAPCD also provides thresholds for localized significance of 100 pounds per day of any criteria pollutant after implementation of all enforceable measures. Projects with emissions above these thresholds would be required to conduct an AAQA to demonstrate that the emissions of criteria pollutants would not cause localized impacts or concentrations exceeding AAQSs.

In addition, the SJVAPCD also contains the following significance thresholds for TACs:

- **Carcinogens:** Maximally exposed individual risk equals or exceeds 20 in 1 million.
- **Non-carcinogens, Acute:** HI equals or exceeds 1 for the maximally exposed individual.
- **Non-carcinogens, Chronic:** HI equals or exceeds 1 for the maximally exposed individual.

Cumulative Criteria Pollutant Emissions Impacts

Impact AIR-1: **The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. The proposed expansion of the City's SOI is strictly a land use change. It would modify the current SOI boundary to encompass the SOI Expansion Area shown on Exhibit 2-2,

enabling annexation of the Master Plan Area and construction of the proposed Vista Ranch Development, discussed further below. In and of itself, the SOI Expansion would not result in physical changes to the environment. Therefore, no impacts would occur.

MP Area 2

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the NEUC common public identity. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of the 368-acre Vista Ranch Development, evaluated below. The remaining 139 acres which constitute MP Area 2, are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. However, the development of MP Area 2 would result in the generation of criteria air pollutant emissions from construction and operation which could result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under a federal or State ambient air quality standard.

As the timing and intensity of future development projects in the MP Area 2 are not known at this time, the precise effects of construction and operational activities associated with buildout of MP Area 2 cannot be accurately quantified at this time. In general, the emissions intensity of construction vehicles and equipment would decrease over time as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technology, particularly for trucks. The details needed for adequate modeling and analysis are not currently available, as the development will occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. It is known that the implementation of MP Area 2 would ultimately result in more development. Construction of a multitude of individual development projects that could occur within the City throughout the buildout period could generate criteria pollutant emissions. To reduce impacts, MP Area 2 would implement MM AIR-1a to reduce emissions resulting from future construction-related activities and MM AIR-1b to reduce emissions resulting from future operational-related activities due to the development of the new residential and nonresidential land uses allowable under MP Area 2. MM AIR-1a and MM AIR-1b would require that development projects subject to CEQA review (i.e., non-exempt projects) within MP Area 2 prepare and submit a technical assessment evaluating potential project construction-related and operational-related air quality impacts to the City for review and approval. The City shall require the incorporation of mitigation measures to reduce air pollutant emissions during construction activities and operational activities to zero. Therefore, MM AIR-1a and MM AIR-1b would provide assurance that the potential construction-related and operational-related criteria pollutant emission impacts would not exceed established thresholds of significance, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Regional Emissions

Air pollutant emissions have regional effects and localized effects. This analysis assesses the regional effects of the Vista Ranch Development criteria pollutant emissions in comparison to SJVAPCD thresholds of significance for short-term construction activities and long-term operation.

The primary pollutants of concern during project construction and operation are ROG, NO_X, PM_{10}, and $PM_{2.5}$. As noted above, the SJVAPCD GAMAQI adopted in 2015 contains thresholds for CO, NO_X, ROG, SO_2, PM_{10}, and $PM_{2.5}$.[28]

The Vista Ranch Development does not contain sources that would produce substantial quantities of SO_2 emissions during construction and operation.

Construction Emissions

Regional construction-related emissions for the Vista Ranch Development were estimated according to the methods and assumptions described in Section 3.3-5, Methodology. Table 3.3-8 shows that annual criteria pollutant emissions would not exceed any of the SJVAPCD's regional thresholds of significance during construction, and regional impacts from construction would be less than significant.

Table 3.3-8: Regional Criteria Air Pollutant Construction Emissions by Year–Vista Ranch Development

Year	Criteria Pollutant Emissions (tons/year)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
2026	2.38	0.26	2.36	0.00	0.49	0.25
2027	3.98	0.34	2.62	0.01	0.22	0.11
2028	6.58	2.29	4.70	0.01	0.69	0.35
2029	4.90	1.43	3.02	0.01	0.26	0.13
2030	6.41	2.42	4.30	0.01	0.66	0.33
2031	6.95	2.16	4.53	0.01	0.67	0.34
2032	6.74	1.52	3.67	0.01	0.50	0.19
2033	6.85	2.92	4.03	0.01	0.82	0.35
2034	8.65	3.12	5.20	0.02	0.73	0.35
2035	6.96	2.12	3.79	0.01	0.35	0.15
2036	3.41	2.02	1.79	0.01	0.20	0.07

[28] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). March 19. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed November 4, 2025.

Year	Criteria Pollutant Emissions (tons/year)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
SJVAPD Annual Thresholds	**100**	**10**	**10**	**27**	**15**	**15**
Do Construction Emissions Exceed Regional Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SO_2 = sulfur dioxide
Totals may not add up due to rounding.

Unmitigated construction emissions incorporate the basic dust control measures required under San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 8201, which requires that vehicle speeds on unpaved roads and surfaces be reduced to no more than 15 miles per hour and exposed construction areas are watered during earthmoving activities.

The emissions do not include Rule 9510 ISR General Mitigation Requirements for Construction Equipment Emissions, which will be required to be complied with and will reduce NOx emissions by 20 percent and PM_{10} emissions by 45 percent.

Source: CalEEMod output files, Appendix D.

Operational Emissions

Regional operational-related emissions for the Vista Ranch Development were estimated according to the methods and assumptions described in Section 3.3-5, Methodology. Table 3.3-9 shows that annual criteria pollutant emissions would exceed the SJVAPCD's regional thresholds of significance during operation for ROG and NO_X.

Table 3.3-9: Regional Criteria Air Pollutant Operational Emissions by Year

Operational Year	Criteria Pollutant Emissions (tons/year)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
2029	17.1	6.1	2.1	0.04	1.6	0.4
2031	32.1	11.9	3.9	0.08	3.2	0.9
2032	59.7	18.0	7.5	0.16	6.6	1.8
2034	77.1	25.1	9.3	0.20	8.8	2.4
2035	78.1	29.6	10.7	0.24	10.5	2.8
2036	85	33	11.6	0.26	11.7	3.1
SJVAPCD Annual Thresholds	**100**	**10**	**10**	**27**	**15**	**15**
Do Operational Emissions Exceed Regional Thresholds?	**No**	**Yes**	**Yes**	**No**	**No**	**No**

Operational Year	Criteria Pollutant Emissions (tons/year)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$

Notes:
SJVAPCD's Rule 9510 ISR requirements include a 33.3 percent reduction in operational NO_X (from baseline emissions) and total operational PM_{10} emissions by 50 percent (from baseline). Emissions shown do not reflect compliance with SJVAPCD Rule 9510, as final emissions to be reduced will be determined during an Air Quality Impact Assessment as a part of compliance with SJVAPCD Rule 9510.

All landscape equipment is assumed be electric by the operational year 2036 based on implementation of ARB's SORE rule to eliminate ROG emissions from this emissions source.

CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SO_2 = sulfur dioxide

Totals may not add up due to rounding.

Source: CalEEMod output files, Appendix D.

Operational ROG from emissions from consumer products, architectural coating, and passenger vehicles would result in operational emissions that exceed SJVAPCD thresholds of significance.

Options to reduce operational emissions of ROG may include:

- Utilize only low ROG cleaning supplies (also known low VOC cleaning supplies) in perpetuity.
- Utilize only low ROG paint supplies (also known low VOC paint supplies) in perpetuity.

These options available to reduce ROG emissions caused by architectural coatings or consumer products during operations would require the use of restricted supplies and equipment by future occupants in perpetuity. Future occupants (including residents as well as workers or visitors or commercial establishments) would have access to consumer products available in the marketplace. Regulation of consumer products available on the marketplace is not within the authority of any individual project applicant or lead agency. Therefore, requiring the use of only low ROG supplies and equipment in perpetuity is neither feasible nor enforceable. However, it is feasible to require the use of low ROG paint supplies, and therefore MM AIR-1c would be required to reduce emissions of ROG.

As shown in Appendix D, all of the operational-related NO_X emissions are attributed to mobile sources and, as discussed previously, some of the sources of ROG also come from vehicle exhaust. All of the vehicles driven as a result of implementation of the Vista Ranch Development are assumed to be private vehicles owned by future residents, as well as workers or visitors of commercial establishments. Similar to consumer products, regulation of private vehicles is not within the control of any individual project applicant or lead agency. Therefore, there are no feasible mitigation measure that can directly reduce this impact. The percentage of gasoline fueled vehicles is anticipated to reduce as the State transitions to Zero-Emission Vehicles (ZEVs) pursuant to various policies and

initiatives; however, future reductions in gasoline fueled vehicles and the associated emissions reductions cannot be assured.

Based on the nonattainment status of the air basin, regional health risks associated with air quality impacts, and CEQA's requirement to implement all feasible mitigation, MM AIR-1d would require the execution of a Voluntary Emission Reduction Agreement (VERA) with the SJVAPCD to criteria pollutants ROG and NO_X—which exceed the regional thresholds—to less than significant levels. The VERA would require that the Vista Ranch Development mitigate NO_X and reactive organic gases (ROG) emissions that are not otherwise required to be fully offset by SJVAPCD permit rules and regulations to quantities below the SJVAPCD regional thresholds of significance (for operations) through the provision of an offset fee, paid by the applicant to the SJVAPCD, to fund programs that will reduce emissions within the SJVAB. The emission reductions that would be required by the VERA would be implemented within the SJVAB in quantities sufficient to mitigate the operational-related ROG, and NO_X emissions to levels that would fall below the SJVAPCD regional thresholds, all to be verified by the SJVAPCD.[29] The mandated emission reductions would be achieved by a menu of options that range from paying a calculated mitigation fee for use in doing emission reduction projects through a grant-type program to applicants in a pre-determined area. The executed VERA would require the payment of a calculated mitigation fee per ton to the SJVAPCD. The agreement would also include an additional administrative fee of 4 percent collected for the SJVAPCD. Expenditure of the mitigation funds is then performed for certified air quality reduction projects throughout the SJVAPCD and within the SJVAB. Final determination of air quality reductions achieved shall be under the determination of the SJVAPCD.

As implemented, the VERA results in greater reductions than would otherwise occur under the SJVAPCD Rule 9510–ISR, since Rule 9510–ISR does not require ROG reductions and only requires a percentage of reductions rather than full reductions of NO_X and PM resulting from project construction and operations. When adopting the ISR and the subsequent VERA programs, the SJVAPCD acknowledges that, as ROG is a precursor to O_3, the reductions are not required in the VERA. Instead, the reductions would be achieved by increasing the NO_X and PM tonnage for project levels.

Therefore, with implementation of MM AIR-1c and MM AIR-1d, Vista Ranch Development emissions would be less than significant and regional impacts from operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment.

Localized Pollutant Analysis (AAQA Screening)

As noted, air pollutant emissions have regional effects and localized effects. Emissions occurring at or near the project have the potential to create a localized impact also referred to as an air pollutant hotspot. Localized emissions are considered significant if when combined with background emissions, they would result in exceedance of any health-based air quality standard. In locations that

[29] Operational-related emissions of PM do not exceed the SJVACPD thresholds of significance when compared against the regional thresholds. However, as discussed below under the Ambient Air Quality Analysis, $PM_{2.5}$ and PM_{10} impacts exceed the SJVAPCD local thresholds. Therefore, PM_{10} is included in MM AIR-1d.

already exceed standards for these pollutants, significance is based on a significant impact level (SIL) that represents the amount that is considered a cumulatively considerable contribution to an existing violation of an air quality standard. This analysis assesses the localized effects of the Vista Ranch Development criteria pollutant emissions in comparison to SJVAPCD thresholds of significance for short-term construction activities and long-term operation.

The SJVAPCD's GAMAQI includes screening thresholds for identifying projects that need detailed analysis for localized impacts. Projects with on-site emission increases from construction activities or operational activities that exceed the 100 pounds per day screening level of any criteria pollutant after compliance with Rule 9510 and implementation of all enforceable mitigation measures would require preparation of an AAQA.

An analysis of average daily emissions during construction and operation was conducted to determine whether emissions would exceed the localized SJVAPCD 100 pounds per day screening threshold for any pollutant of concern.

Construction–AAQA Screening

Construction emissions were estimated as described in Section 3.3-5, Methodology. Table 3.3-9 shows criteria air pollutant emissions in tons per year. The Vista Ranch Development would be constructed in six phases over approximately 10 years. The year with the highest (maximum) emissions (in tons per year) was identified and is shown in Table 3.3-10.

Table 3.3-10: Construction Year(s) with Maximum Criteria Air Pollutant Emissions–Tons per Year

Year	Criteria Pollutant Emissions (tons/year)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
2033	6.85	2.92	4.03	0.01	**0.82**	0.35
2034	**8.65**	**3.12**	**5.20**	**0.02**	0.73	**0.35**

Notes:
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SO_2 = sulfur dioxide

Totals may not add up due to rounding.
Unmitigated construction emissions incorporate the basic dust control measures required under San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 8201, which requires that vehicle speeds on unpaved roads and surfaces be reduced to no more than 15 miles per hour and exposed construction areas are watered during earthmoving activities.

The emissions do not include rule 9510 ISR Clean Fleet Commitments which could reduce NO_X emissions by an additional 20 percent and total PM_{10} emissions by another 45 percent.

Source: CalEEMod output files, Appendix D

Table 3.3-11 shows the maximum year of construction emissions (year 2034 for CO, ROG, NO_X, SO_2, and $PM_{2.5}$ and year 2033 for PM_{10}) in average pounds per day for comparison against the SJVAPCD screening thresholds (the thresholds are pounds per day). Table 3.3-11 includes combined on-site and off-site emissions (estimated as described in Section 3.3-5, Methodology). The emissions in Table 3.3-11 are compared against the localized SJVAPCD screening thresholds for criteria air pollutant emissions. As shown, the Vista Ranch Development would not exceed SJVAPCD screening thresholds during the maximum year (and therefore would not exceed for any year), and localized impacts from construction would be less than significant.

Table 3.3-11: Average Daily Criteria Air Pollutant Emissions During Construction–Maximum Emissions in Pounds per Day

Construction Activity	Criteria Air Pollutant					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
Maximum Annual Emissions (tons)	8.65	3.12	5.20	0.02	0.82	0.35
Average Daily Emissions (lbs)	47.38	17.11	28.47	0.09	4.47	1.92
AAQA Screening Threshold	**100**	**100**	**100**	**100**	**100**	**100**
Exceed screening threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
AAQA = Ambient Air Quality Analysis
CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SO_2 = sulfur dioxide
Conservatively includes all construction emissions including mobile sources operating outside of the 0.25 mile of the site boundary.

1. Average daily emissions are determined by dividing total on-site construction emissions by days where construction occurs. This follows guidance from San Joaquin Valley Air Pollution Control District (SJVAPCD) Guidance for projects where project-specific construction schedule is unknown. California Emissions Estimator Model (CalEEMod) phasing modeled is for purposes of overall emissions characterization and is not meant to simulate the construction intensity or efforts on a granular, daily basis.
2. PM_{10} and $PM_{2.5}$ emissions are from the mitigated output to reflect compliance with Regulation VIII—Fugitive PM_{10} Prohibitions.
3. Emissions are based on total construction emissions (rather than only those within 0.25 mile; including the entirety of the construction vehicle emissions represents a conservative analysis). This conservative analysis captures any emissions from on-road vehicles idling at the site and lower speeds in the vicinity of the site. Since these total emissions are below AAQA thresholds it was determined that refining the analysis to capture only the 0.25-mile radius was unnecessary.
4. The maximum year for each pollutant is CO: 2034. ROG: 2034. NO_X: 2034. SO_2: 2034. PM_{10}: 2033. $PM_{2.5}$: 2034.

Source of Emissions: CalEEMod Output (Appendix D).

Operation–AAQA Screening

Operational emissions were estimated as described in Section 3.3-5, Methodology. The maximum daily emissions during operation (beginning in the year 2036 at full Vista Ranch Development

buildout) are shown in Table 3.3-12 and compared against the localized SJVAPCD screening thresholds. As shown, the Vista Ranch Development would exceed SJVAPCD screening thresholds for CO and ROG emissions and therefore additional ambient air quality modeling would be required.

Table 3.3-12: Maximum Daily Criteria Air Pollutant Emissions During Operation

Operational Emissions	Average Daily Emissions (lbs/day)					
	CO	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$
Area (Consumer Products)	0	105.55	0	0	0	0
Area (Architectural Coating)	0	8.40	0	0	0	0
Energy	—	—	—	—	—	—
Mobile	233.53	64.25	35.52	0.36	32.11	8.31
Total	**233.53**	**178.20**	**35.53**	**0.36**	**32.11**	**8.31**
AAQA Screening Threshold	**100**	**100**	**100**	**100**	**100**	**100**
Exceed screening threshold?	**Yes**	**Yes**	**No**	**No**	**No**	**No**

Notes:
Emissions were calculated for the year 2036 which represents the year of the total buildout of the Vista Ranch Development.

The Vista Ranch Development would be constructed as all-electric and therefore energy emissions are zeroed out.

CO = carbon monoxide
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in diameter
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SO_2 = sulfur dioxide

Source of Emissions: CalEEMod Output (Appendix D).

Ambient Air Quality Analysis

As noted in Table 3.3-12, operational-related criteria air pollutant emissions would exceed SJVAPCD screening thresholds of 100 pounds per day for any criteria air pollutant. Therefore, in accordance with the SJVAPCD APR-2030, a Level 2 AAQA was performed in accordance with SJVAPCD Policy APR 1925. The emissions for on-site and off-site operational non-permitted source activities were estimated as described in Section 3.3-5, Methodology. Emissions were modeled according to the modeling parameters contained in Policy 1925. A receptor grid was developed around MP Area 1, in areas with sensitive receptors, with 25 meters spacing on the boundary, 25 meters spacing from the boundary out to 100 meters, 50 meters spacing from 100 meters to 250 meters, and 100 meters spacing from 250 meters to 500 meters. SJVAPCD-approved, AERMET-processed meteorological data for Fresno County was input into AERMOD. Each pollutant was modeled separately using the emission rates developed as described in Section 3.3-5, Methodology. The modeled concentrations for each pollutant/averaging period at each receptor were summed from the contributions from each source in AERMOD. From these, the maximum receptor is selected as the predicted concentration.

Table 3.3-13 shows the existing available background concentrations, the maximum impacts attributable to the Vista Ranch Development when considered in addition to the existing available background concentrations, and the applicable ambient air quality standard for all of the averaging periods for NO_2 and CO. SO_2 emissions are considered negligible given the absence of substantial combustion sources or industrial activities typically associated with SO_2 generation; therefore, SO_2 was not included in the dispersion modeling and AAQA.

Table 3.3-13: Maximum Predicted Ambient Air Quality Impacts

Pollutant	Averaging Period	Background	Project ($\mu g/m^3$)	Project + Background ($\mu g/m^3$)	CAAQS	NAAQS
CO	1-hour	1,840 $\mu g/m^3$ (1.6 ppm)	256 $\mu g/m^3$ (0.22 ppm)	2,096 $\mu g/m^3$	23,000 $\mu g/m^3$ 20 ppm	40,000 $\mu g/m^3$ 35 ppm
	8-hour	1,265 $\mu g/m^3$ (1.1 ppm)	142 $\mu g/m^3$ (0.12 ppm)	1,407 $\mu g/m^3$	10,000 $\mu g/m^3$ 9.0 ppm	10,000 $\mu g/m^3$ 9.0 ppm
NO_2	1-hour	75.5 $\mu g/m^3$ (40 ppb)	36.63 $\mu g/m^3$ (19.5 ppb)	112.13 $\mu g/m^3$	339 $\mu g/m^3$ (180 ppb)	188 $\mu g/m^3$ (100 ppb)
	Annual	13.2 $\mu g/m^3$ (7 ppb)	1.18 $\mu g/m^3$	14.38 $\mu g/m^3$	57 $\mu g/m^3$ (30 ppb)	100 $\mu g/m^3$ (53ppb)

Notes:
$\mu g/m^3$ = micrograms per cubic meter
CO = carbon monoxide
CAAQS = California Ambient Air Quality Standards
NAAQS = National Ambient Air Quality Standards
NO_2 = nitrogen dioxide
ppb = parts per billion
ppm = parts per million

For the purposes of establishing background concentrations of applicable criteria pollutants, this Ambient Air Quality Analysis (AAQA) relied on United States Environmental Protection Agency (EPA) and California Air Resources Board (ARB) monitoring values from the closest monitoring station–Clovis–Villa, located at 908 North Villa Avenue. Background values are EPA-published design values for most recently available monitoring years.

Source: Appendix D.

As shown in Table 3.3-13, air dispersion modeling demonstrates that the maximum impacts, when considered in addition to the existing available background concentrations, are below the applicable ambient air quality standard for all of the averaging periods for NO_2 and CO. Modeling for short-term averages utilized the peak hourly emission rate regardless of hour of day, to ensure capturing a maximum 1-hour concentration and is a conservative approach for an 8-hour average. Average concentrations for daily (24-hour) averaging times accounted for the diurnal nature of the mobile sources emissions, considering both AM and PM peak traffic periods. This approach utilized profiles developed by SJVAPCD for on-road motor vehicles modified for use in AERMOD as variable emission factors.

Because existing background levels of $PM_{2.5}$ and PM_{10} already exceed the ambient air quality standards, those pollutants were evaluated according to Level 2 AAQA Analysis–Step 2 guidance described in APR 1925. PM_{10} and $PM_{2.5}$ are interpreted to be total PM_{10} and $PM_{2.5}$ and were modeled as ground level releases with an initial sigma of 1 meter not modeled separately. Emissions of the mobile sources were modeled accounting for diurnal variations in the traffic volumes by scaling the average hourly emission rate by variable emission factors in AERMOD. The diurnal profile used was from SJVAPCD (Code 50) for On-road Motor Vehicles for peak activity at 7:00 a.m. and 4:00 p.m. to capture the diurnal nature of the traffic emissions. The SJVAPCD raw activity factors for each hour of the day were normalized and then scaled such that the sum of the hourly variable emission factors added to 24 each day. This approach more realistically models the emissions and dispersion, since both traffic volumes and wind speed/atmospheric mixing vary with time of day. Calm conditions (characterized by low wind speeds and limited atmospheric mixing) result in higher predicted concentrations occur primarily in the middle of the night or early morning hours when traffic emissions are low. Therefore, a uniform average hourly emission rate modeled over 24-hours will overpredict the average daily (or annual) concentration since it will not account for these daily (diurnal) variations in emissions. The maximum modeled concentration for $PM_{2.5}$ and PM_{10} and the averaging period combination was compared to the appropriate SIL.

A comparison of the proposed impact from the Vista Ranch Development to the SJVAPCD SILs, as shown in Table 3.3-14, demonstrates that all modeled 24-hour PM_{10} and 24-hour $PM_{2.5}$ impacts directly attributable to the Vista Ranch Development would not exceed applicable SJVAPCD significance levels for the respective averaging periods. Therefore, the local impact to air quality would be less than significant.

Table 3.3-14: Comparison of Maximum Modeled Project Impact with Significance Thresholds

Pollutant	Averaging Period	Predicted Concentration ($\mu g/m^3$)	SJVAPCD SIL ($\mu g/m^3$)
PM_{10}	Annual	0.57	1
	24-hour	1.56	5
$PM_{2.5}$	Annual	0.12881	0.13
	24-hour	0.38	1.2

Notes:
$\mu g/m^3$ = micrograms per cubic meter
PM_{10} = particles greater than or equal to 10 micrometers
$PM_{2.5}$ = particles matter less than or equal to 2.5 micrometers

Source: Appendix D
Maximum Annual Concentration from modeled Year 2018–2022.
Maximum 24-hour Concentration from modeled Year 2018-2022.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

MM AIR-1a Prior to discretionary approval by the City of Clovis (City) for any development project within Master Plan (MP) Area 2 that is subject to California Environmental Quality Act (CEQA) review, project applicants shall prepare and submit a technical air quality assessment evaluating the project's construction emissions of criteria air pollutants in accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. All emissions that the assessment identifies in excess of zero shall be fully offset through a combination of on-site, off-site, and/or SJVAPCD-approved emission reduction mechanisms sufficient to reduce net construction emissions to zero.

To achieve zero-net construction emissions, the City shall require applicants to implement any combination of the following, or other mechanisms of equivalent or superior effectiveness approved by the City and SJVAPCD:

- Implement on-site measures that reduce construction emissions of nitrogen oxides (NO_X), reactive organic gas (ROG), particulate matter, less than 10 microns in diameter (PM_{10}), and particulate matter, less than 2.5 microns in diameter ($PM_{2.5}$) to the maximum extent feasible, which may include but are not limited to:
  - Use of Tier 4 Final off-road diesel equipment or the cleanest equipment available at the time of construction;
  - Substitution of electric-powered or zero-emission construction equipment where commercially available;
  - Installation of temporary electric power to avoid use of diesel generators;
  - Idling restrictions stricter than State requirements of 5 minutes (e.g., 2 minute maximum);
  - Require all haul trucks and vendor trucks to meet Model Year 2010 or newer engine standards;
  - Use of low volatile organic compound (VOC) coatings and materials during construction;
  - Enhanced dust control measures beyond SJVAPCD Rule 8021/8031 (e.g., applying water stabilizers, increased watering frequency, wind fencing, or early paving);
  - Minimizing overlapping construction phases and sequencing activities to reduce daily equipment intensity;
  - Use of carpooling, shuttles, or staging management to reduce construction worker Vehicle Miles Traveled (VMT);

- Implementing a Construction Emissions Reduction Plan demonstrating quantifiable reductions.

Any remaining construction emissions that cannot be feasibly reduced on-site shall be mitigated through SJVAPCD-approved mechanisms (such as a Voluntary Emission Reduction Agreement (VERA) or off-site emission reduction program) to achieve a net-zero construction emissions outcome.

MM AIR-1b Prior to discretionary approval by the City of Clovis (City) for any development project within Master Plan (MP) Area 2 that is subject to California Environmental Quality Act (CEQA) review, project applicants shall prepare and submit a technical air quality assessment evaluating the project's operational emissions of criteria air pollutants in accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. All emissions that the assessment identifies in excess of zero shall be fully offset through a combination of on-site, off-site, and/or SJVAPCD-approved emission reduction mechanisms sufficient to reduce net operational emissions to zero, such that each development project in the MP Area 2 results in no net increase in regional criteria pollutant emissions.

To achieve zero-net operational emissions, the City shall require applicants to implement any combination of the following, or other mechanisms of equivalent or superior effectiveness approved by the City and SJVAPCD:

On-site operational emission reduction strategies shall include, but not be limited to:

- Electric-ready or all-electric building design;
- Installation of electric vehicle (EV) charging infrastructure exceeding minimum code;
- Transportation Demand Management (TDM) programs that reduce Vehicle Miles Traveled (VMT);
- Provision of transit passes, micro-transit, or car-share programs;
- Installation of photovoltaic systems sized to offset on-site energy loads;
- Use of low- or zero-emission landscape maintenance equipment;
- Installation of additional bicycle and pedestrian facilities that shift trips away from vehicle use.

Off-site mitigation measures shall include participation in:

- Off-site EV charging infrastructure projects;
- Off-site renewable energy or electrification programs;
- SJVAPCD-approved off-site emission reduction projects.

A Voluntary Emission Reduction Agreement (VERA) with SJVAPCD shall be used to mitigate remaining residual emissions of nitrogen oxides (NO_X), reactive organic gas

(ROG), particulate matter, less than 10 microns in diameter (PM_{10}), and particulate matter, less than 2.5 microns in diameter ($PM_{2.5}$) to zero.

- A VERA may be used alone or in combination with on-site and off-site measures to fully offset remaining emissions.
- All VERA obligations shall be secured through conditions of approval.

The final mitigation package shall achieve full zero-offset (0 pounds per day net operational emissions) for each criteria pollutant (quantified through the required technical assessment). All required mitigation measures shall be included as conditions of project approval and shall be enforceable by the City.

Vista Ranch Development/MP Area 1

MM AIR-1c Require the use of low volatile organic compound (VOC) (reactive organic gas [ROG]) paints in exceedance of the minimum regulatory requirements of Rule 4601.

Prior to issuance of any grading or construction permits, the Owner/Operator shall demonstrate that all architectural coatings used during operation shall be super-compliant, defined as having a VOC (ROG) content of 10 grams per liter or less, significantly below the limits specified in Rule 4601. This requirement applies to all interior and exterior paints, primers, stains, and sealers used on buildings, structures, and site features.

The construction contractor shall:

- Include this requirement in all procurement documents and subcontractor agreements.
- Maintain records of product specifications and VOC content for all coatings used.
- Submit documentation to the City of Clovis (City) demonstrating compliance prior to final inspection.
- The City shall verify compliance through periodic site inspections and review of contractor submittals.

MM AIR-1d Prior to issuance of any grading or construction permits the Owner/Operator shall enter into a Voluntary Emission Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD) to mitigate oxides of nitrogen (NO_X) and reactive organic gases (ROG) emissions associated with implementation of the Vista Ranch Development that are not otherwise required to be fully offset by SJVAPCD permit rules and regulations to quantities below the SJVAPCD regional thresholds of significance (for operations).

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope for the cumulative criteria pollutant air quality impact analysis is the SJVAB. Because the SJVAB is designated nonattainment for the State and federal O_3 standards, the federal $PM_{2.5}$ standards, and the State PM_{10} and $PM_{2.5}$ standards, there are significant cumulative air quality impacts related to these pollutants. By its very nature, air pollution is largely a cumulative impact, and, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As discussed above, criteria air pollutants generated by MP Area 2 could exceed the SJVAPCD regional thresholds of significance. To reduce impacts, MM AIR-1a would be implemented to reduce emissions resulting from future construction-related activities and MM AIR-1b would be implemented to reduce emissions resulting from future operational-related activities because of the development of the new residential and nonresidential land uses allowable under MP Area 2. MM AIR-1a and MM AIR-1b would require that development projects subject to CEQA review (i.e., non-exempt projects) within MP Area 2 to prepare and submit a technical assessment evaluating potential project construction-related and operational-related air quality impacts to the City of Clovis for review and approval. The evaluation shall be prepared in conformance with SJVAPCD methodology for assessing air quality impacts. The City shall require that applicants for new development projects within MP Area 2 incorporate mitigation measures to reduce air pollutant emissions during construction activities and operational activities to zero. Therefore, MM AIR-1a and MM AIR-1b would provide assurance that the potential construction-related and operational-related criteria pollutant emission impacts would not exceed established thresholds of significance, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

The geographic scope for the cumulative criteria pollutant air quality impact analysis is the SJVAB. Because the SJVAB is designated nonattainment for the State and federal O_3 standards, the federal $PM_{2.5}$ standards, and the State PM_{10} and $PM_{2.5}$ standards, there are significant cumulative air quality impacts related to these pollutants. By its very nature, air pollution is largely a cumulative impact, and, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As discussed above, the criteria air pollutants generated under the Vista Ranch Development would exceed the SJVAPCD regional thresholds of significance for ROG and NO_X. To reduce impacts, the

Vista Ranch Development would implement MM AIR-1c to reduce ROG emissions, and MM AIR-1d to reduce overall criteria pollutants by requiring the execution of a VERA with the SJVAPCD for mitigation of criteria pollutants ROG and NO_X. The emission reductions that would be required by the VERA would be implemented within the SJVAB in quantities sufficient to mitigate the operational-related ROG and NO_X air quality emissions to below the SJVAPCD thresholds. Therefore, with implementation of MM AIR-1c and MM AIR-1d, the criteria air pollutant emissions would not be cumulatively considerable, and impacts would be less than significant with mitigation.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact .

Mitigation Measures

MP Area 2

Implement project-specific MM AIR-1a and MM AIR-1b; no additional mitigation required at the cumulative level.

Vista Ranch Development/MP Area 1

Implement project-specific MM AIR-1c and MM AIR-1d; no additional mitigation required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Consistency with Air Quality Management Plan

Impact AIR-2:	**The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. The proposed expansion of the City's SOI is strictly a land use change. It would modify the current SOI boundary to encompass the SOI Expansion Area shown on Exhibit 2-2,

enabling annexation of the Master Plan Area and construction of the proposed Vista Ranch Development, discussed further below. In and of itself, the SOI Expansion would not result in physical changes to the environment. Therefore, no impacts would occur.

MP Area 2

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the Northeast Urban Center (NEUC) common public identity. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of MP Area 1, evaluated below. The remaining 139 acres, which comprise MP Area 2, are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from this Revised Draft EIR. However, the development of MP Area 2 would result in the generation of criteria air pollutant emissions from construction and operation which could conflict with or obstruct implementation of the applicable Air Quality Plan (AQP).

As the timing and intensity of future development projects in the MP Area 2 are not known at this time, the precise effects of construction and operational activities associated with the buildout of MP Area 2 cannot be accurately quantified at this time. In general, the emissions intensity of construction vehicles and equipment would decrease over time as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technology, particularly for trucks. The details needed for adequate modeling and analysis are not currently available, as the development would occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. It is known that the implementation of MP Area 2 would ultimately result in more development. Construction of a multitude of individual development projects that could occur within the City throughout the buildout period could generate criteria pollutant emissions that could have a significant impact on the environment and, therefore, could obstruct implementation of the applicable AQP.

To reduce impacts, MP Area 2 would implement MM AIR-1a to reduce emissions resulting from future construction-related activities and MM AIR-1b to reduce emissions resulting from future operational-related activities because of the development of the new residential and nonresidential land uses allowable under MP Area 2. MM AIR-1a and MM AIR-1b would require development projects subject to CEQA review (i.e., non-exempt projects) within MP Area 2 to prepare and submit a technical assessment evaluating potential project construction-related and operational-related air quality impacts to the City for review and approval. The evaluation would need to be prepared in conformance with SJVAPCD methodology for assessing air quality impacts. If construction-related and/or operational-related criteria air pollutants are determined to have the potential to exceed the SJVAPCD's adopted thresholds of significance, the City would require that applicants for new development projects within MP Area 2 incorporate mitigation measures to reduce air pollutant emissions during construction activities and operational activities to zero. According to the SJVAPCD's GAMAQI, "projects with emissions below the thresholds of significance for criteria pollutants would be determined to not conflict or obstruct implementation of the District's air quality

plan."[30] Therefore, MM AIR-1a and MM AIR-1b would provide assurance that the potential construction-related and operational-related criteria pollutant emission impacts would not exceed established thresholds of significance and, therefore, would not obstruct implementation of the applicable AQP, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Implementation of the Vista Ranch Development would generate both temporary (construction) and long-term (operational) emissions, which could conflict with or obstruct with an applicable AQP. According to the SJVAPCD's GAMAQI, "projects with emissions below the thresholds of significance for criteria pollutants would be determined to not conflict or obstruct implementation of the District's air quality plan."[31] Therefore, the analysis below will evaluate the Vista Ranch Development's consistency with the applicable AQP against whether or not it exceeds criteria pollutant thresholds of significance established by SJVAPCD.

Construction

The Vista Ranch Development would comply with all applicable SJVAPCD Rules and Regulations during construction, including basic dust control measures required under SJVAPCD Rule 8201.

Regional construction-related emissions for the Vista Ranch Development were estimated according to the methods and assumptions described in Section 3.3-5, Methodology and impacts were discussed above under impact AIR-1. Table 3.3-8 shows that annual criteria pollutant emissions would not exceed any of the SJVAPCD's regional thresholds of significance during construction and regional impacts from construction would be less than significant.

Localized construction emissions for the Vista Ranch Development were estimated according to the methods and assumptions in Section 3.3-5, Methodology, and impacts were discussed above under impact AIR-1. The average daily combined on-site and off-site emissions are presented in Table 3.3-11; the year(s) with the maximum level of emissions (by pollutant) are shown Table 3.3-10 and compared against the localized SJVAPCD screening thresholds. As shown, the Vista Ranch Development would not exceed SJVAPCD screening thresholds during the maximum year (and therefore would not exceed for any year) and localized impacts from construction would be less than significant.

Therefore, the Vista Ranch Development would not conflict with or obstruct implementation of the applicable AQP during construction.

Operation

The Vista Ranch Development would comply with all applicable SJVAPCD Rules and Regulations during operation, including SJVAPCD's Rule 9510 (ISR Rule), which requires projects to reduce NO_X

[30] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. March 19. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed November 4, 2025.

[31] Ibid.

emissions by 20 percent. Because the Vista Ranch Development does not include any stationary sources, the stationary control measures identified by SJVAPCD are not relevant.

Regional operational-related emissions for the Vista Ranch Development were estimated according to the methods and assumptions described in Section 3.3-5, Methodology, and discussed above under impact AIR-1. As shown in Table 3.3-9, annual emissions of ROG and NO_X would exceed the SJVAPCD's regional thresholds of significance. Implementation of MM AIR-1c (which would reduce ROG emissions by requiring the use of ultra-low VOC paint) and MM AIR-1d (which would reduce ROG and NO_X emissions by requiring the use of a VERA) would reduce emissions from operational-related activities to less than significant.

Localized operational emissions for the Vista Ranch Development were estimated according to the methods and assumptions described in Section 3.3-5, Methodology, and discussed above under impact AIR-1. The maximum daily emissions during operation (beginning in the year 2036 at full Vista Ranch Development buildout) are shown in Table 3.3-10 and are compared against the localized SJVAPCD screening thresholds. The Vista Ranch Development would exceed SJVAPCD screening thresholds, and therefore, additional ambient air quality modeling was performed. The additional modeling determined that localized criteria air pollutant emissions would not exceed SJVAPCD's localized thresholds of significance during operation, and localized impacts from operation would be less than significant.

Therefore, the Vista Ranch Development would not be considered to conflict with or obstruct implementation of the applicable AQP, and impacts would be less than significant with incorporation of MM AIR-1c and MM AIR-1d.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM AIR-1a and MM AIR-1b.

Vista Ranch Development/MP Area 1

Implement MM AIR-1c and MM AIR-1d.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope for the cumulative criteria pollutant air quality impact analysis is the SJVAB. Because the SJVAB is designated nonattainment for the State and federal O_3 standards, the federal $PM_{2.5}$ standards, and the State PM_{10} and $PM_{2.5}$ standards, there are significant cumulative air quality impacts related to these pollutants. By its very nature, air pollution is largely a cumulative impact, and if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As discussed above, MP Area 2 would implement MM AIR-1a to reduce emissions resulting from future construction-related activities and MM AIR-1b to reduce emissions resulting from future operational-related activities because of the development of the new residential and nonresidential land uses allowable under MP Area 2. MM AIR-1a and MM AIR-1b would require development projects subject to CEQA review (i.e., non-exempt projects) within MP Area 2 to prepare and submit a technical assessment evaluating potential project construction-related and operational-related air quality impacts to the City for review and approval. The evaluation would need to be prepared in conformance with SJVAPCD methodology for assessing air quality impacts. If construction-related and/or operational-related criteria air pollutants are determined to have the potential to exceed the SJVAPCD's adopted thresholds of significance, the City would require that applicants for new development projects within MP Area 2 incorporate mitigation measures to reduce air pollutant emissions during construction activities and operational activities to zero. According to the SJVAPCD's GAMAQI, "projects with emissions below the thresholds of significance for criteria pollutants would be determined to not conflict or obstruct implementation of the District's air quality plan."[32] Therefore, MM AIR-1a and MM AIR-1b would provide assurance that the potential construction-related and operational-related criteria pollutant emission impacts would not exceed established thresholds of significance and, therefore, MP Area 2 would not obstruct implementation of the applicable AQP, and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The geographic scope for the cumulative criteria pollutant air quality impact analysis is the SJVAB. Because the SJVAB is designated nonattainment for the State and federal O_3 standards, the federal $PM_{2.5}$ standards, and the State PM_{10} and $PM_{2.5}$ standards, there are significant cumulative air quality impacts related to these pollutants. By its very nature, air pollution is largely a cumulative impact, and if a project exceeds the identified significance thresholds, its emissions would be cumulatively

[32] San Joaquin Valley Air Pollution Control District (SJVAPCD). 2015. Guidance for Assessing and Mitigating Air Quality Impacts. March 19. Website: https://www.valleyair.org/media/g4nl3p0g/gamaqi.pdf. Accessed November 4, 2025.

considerable resulting in significant adverse air quality impacts to the region's existing air quality conditions.

As discussed above, the Vista Ranch Development would be consistent with the applicable AQP and criteria air pollutant and PM emissions generated would not exceed the SJVAPCD regional thresholds of significance for ROG and NO_X after implementation of MM AIR-1c and MM AIR-1d. Therefore, the Vista Ranch Development's contribution to significant cumulative air quality impacts related to criteria air pollutant emissions in the SJVAB would be less than significant with mitigation.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement project-specific MM AIR-1a and MM AIR-1b; no additional mitigation required at the cumulative level.

Vista Ranch Development/MP Area 1

Implement project-specific MM AIR-1c and MM AIR-1d; no additional mitigation required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Exposure to Pollutant Concentrations

Impact AIR-3:	**The proposed project would not expose sensitive receptors to substantial pollutant concentrations.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

Construction and Operation

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the NEUC common public identity. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of MP Area 1, as evaluated below. The remaining 139 acres, which comprise MP Area 2, are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. However, the development of MP Area 2 would result in the generation of criteria air pollutant emissions from construction and operation which could expose sensitive receptors to substantial pollutant concentrations.

As the timing and intensity of future development projects in the MP Area 2 are not known at this time, the precise effects of construction and operational activities associated with buildout of MP Area 2 cannot be accurately quantified at this time. In general, the emissions intensity of construction vehicles and equipment would decrease over time as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technology, particularly for trucks. The details needed for adequate modeling and analysis are not currently available as the development would occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. It is known that the implementation of MP Area 2 would ultimately result in more development. Construction of a multitude of individual development projects that could occur within the City throughout the buildout period could generate concentrations of TACs and/or DPM emissions that cause adverse health effects. Therefore, to reduce health risks, MP Area 2 would implement MM AIR-3 to reduce emissions of and exposure to TACs and/or DPM resulting from future construction- and operational-related activities from the development of the new residential and nonresidential land uses allowable under MP Area 2. MM AIR-3 would require projects to conduct an HRA to evaluate construction- and operational-related TAC emissions and associated health risks, and if the HRA shows that the incremental cancer risk and/or non-cancer hazard index (HI) exceed the respective thresholds, as established by the SJVAPCD at the time a project is considered, the project applicant would be required to identify and demonstrate that best available control technologies for toxics (T-BACT), including appropriate enforcement mechanisms, are capable of reducing potential cancer and non-cancer risks to an acceptable level. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan. The City would consider all future development accommodated in MP Area 2 where subject to CEQA and would require discretionary approval to ascertain whether an individual development would generate potentially significant impacts. The City would require the implementation of additional mitigation measures to minimize emissions and reduce potentially significant impacts. Therefore, MM AIR-3 would provide assurance that the potential health risks to nearby receptors from projects developed within MP Area 2 would be reduced to less than significant levels.

Therefore, with implementation of MM AIR-3, MP Area 2 would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Construction

As described in Section 3.3-5, Methodology, an HRA was performed for construction-related DPM emissions to estimate the cancer and non-cancer chronic health risks associated with construction of the Vista Ranch Development. The non-cancer acute health risks were not estimated because OEHHA has not established an acute REL for DPM and there are no acute non-cancer risk values associated with DPM. DPM emissions by construction phase are presented in Table 3.3-15.

Table 3.3-15: DPM Emissions from Vista Ranch Development Construction

Phase	On-site DPM (lb/yr)	Off-site DPM (lb/yr)	Total DPM (lb/yr)
Phase 1	188.5	0.27	188.8
Phase 2	150.2	0.26	150.4
Phase 3	164.6	0.22	164.8
Phase 4	139.3	0.38	139.6
Phase 5	170.0	0.15	170.1
Phase 6	126.7	0.12	126.8
TOTAL	**939.2**	**1.39**	**940.6**

Notes:
Off-Site emissions include entire emissions from the modeled road segment along East Sheperd Avenue.
DPM = Diesel Particulate Matter, modeled as Diesel Particulate Matter–Exhaust, less than 10 microns or $PM_{10}E$
The total DPM emissions from all years of each phase were divided by the phase duration to derive phase totals.
lb/yr = pounds per year
Source: Appendix D.

The HRA evaluated the health risks from DPM concentrations at various receptor locations and receptor types, as described in Section 3.3-5, Methodology. As discussed, the health risks to off-site receptors were estimated for the duration of the construction period (approximately 10.5 years), and the health risks to the future on-site receptors of phase 1 (during construction of phases 2 through 6)) were estimated for the remaining duration of the construction period (approximately 8 years). The health risks at the potential future elementary school (with children aged 3 through 11 years) was based on an attendance span of 8 years corresponding to the first 8 years of Vista Ranch Development construction (Phases 1 through 5). Exposure assumptions and the HRA methodology accounted for overlapping phases.

The HRA identified an on-site Maximally Exposed Individual Resident (MEIR) and an off-site MEIR. The HRA also evaluated health risks at the potential future school. The health risks at the on-site MEIR, the off-site MEIR and the school are provided in Table 3.3-16. As demonstrated in Table 3.3-16, construction of the Vista Ranch Development would not result in increased cancer risk or HI in

excess of SJVAPCD's significance thresholds at any of the maximally exposed receptors, and impacts would be less than significant.

Table 3.3-16: Summary of Construction-Related Health Risks at the Maximum Exposed Receptors

Receptor	Chronic Non-cancer Hazard Index (HI)	Cancer Risk (per Million)
On-Site MEIR [1]	<0.01	10.2
Off-Site MEIR [2]	0.01	9.06
School (MP Area 2) [3]	0.01	4.16
Thresholds of Significance	**1**	**20**
Exceeds SJVAPCD Threshold?	**No**	**No**

Notes:
HI = Hazard Index

[1] The on-site Maximally Exposed Individual Resident (MEIR) was found to be a residence located at the northeastern corner of the phase 1 construction area located at Universal Transverse Mercator (UTM) coordinates 262350 m Easting, 4083815 m Northing. This receptor would be exposed to the construction activities during phases 2 through 6. The HI was evaluated by construction phase; the maximum HI was found to occur during phase 2 construction at the location at UTM coordinates 262350 m Easting, 4083815 m Northing.

[2] The off-site MEIR was found to be a residence border of the phase 1 construction area located at UTM coordinates 262018 m Easting, 4083516 m Northing. This receptor would be exposed to the construction activities during phases 1 through 6. The HI was evaluated by construction phase; the maximum HI was found to occur during phase 3 construction at the location at UTM coordinates 262750 m Easting, 4083750 m Northing.

[3] The potential school is located in the MP Area 2 at the southern border of the phase 3 construction area of the Vista Ranch Development. Children at the school (assumed to be aged 3 through 11) would be exposed to the construction activities for a maximum attendance span of 8 years during phases 1 through 5. The receptor with the maximum cancer risk was found to occur at the UTM coordinates 262650 m Easting, 4083550 m Northing. The HI was evaluated by construction phase; the maximum HI was found to occur during phase 3 construction located at UTM coordinates 262750 m Easting, 4083750 m Northing.

Source: Appendix D.

Operation

A residential/commercial development is not expected to generate substantive DPM or TAC emissions during operational activity. The Vista Ranch Development would not have stationary sources or on-site sources of TACs during operation. Traffic would consist of mostly light-duty gasoline powered vehicles, which are not a significant source of TAC or DPM emissions. In addition, the Vista Ranch Development would be required to comply with all relevant ordinances and policies to reduce the potential for future air quality problems, such as odors and the emission of air pollutants, by minimizing airborne dust and particulate matter during construction and grading; by using the best available control technology for operations that could generate air pollutants; by encouraging energy conservation and low-polluting energy sources; and by promoting landscaping and tree planting to absorb carbon monoxide and other pollutants. Therefore, the Vista Ranch

Development would not expose sensitive receptors to substantial TAC or DPM emissions during operation, and impacts would be less than significant.

CO Hotspots

As noted above, an AAQA was conducted and modeled CO levels in the immediate project vicinity (as described in Section 3.3-5, Methodology) would be below significant impact levels established by SJVAPCD. As demonstrated, the Vista Ranch Development would not cause or contribute to a CO hotspot.

Valley Fever

The Vista Ranch Development has the potential to generate fugitive dust and suspend Valley Fever spores within the dust that could then reach nearby sensitive receptors. It is possible that on-site workers could be exposed to Valley Fever as fugitive dust is generated during construction. However, as discussed earlier, because of its former agricultural/cultivated land use, MP Area 1 would have low probability of *C. immitis* (Valley Fever) growth on-site or exposure from disturbed soil.

During construction, compliance with dust control regulations would further reduce the potential to expose sensitive receptors to Valley Fever. The Vista Ranch Development would be required to comply with Rule 8021 Section 6.3, which requires applicants to develop, prepare, submit, obtain approval of, and implement a Dust Control Plan, which would reduce fugitive dust impacts to less than significant for all construction phases, which would also control the release of the *C. immitis* fungus from construction activities.

During operations, MP Area 1 would be built up and would not provide a conducive environment for Valley Fever.

Asbestos

Naturally occurring asbestos can be released from serpentinite and ultramafic rocks when the rock is broken or crushed. As discussed earlier, exposure to naturally occurring asbestos can occur during soil-disturbing activities in areas with deposits present. At the point of release, the asbestos fibers may become airborne, causing air quality and human health hazards. These rocks have been commonly used for unpaved gravel roads, landscaping, fill projects, and other improvement projects in some localities. Asbestos may be released to the atmosphere from vehicular traffic on unpaved roads, during grading of development projects, and at mining operations. However, the rules required by SJVAPCD Regulation 8 would prevent and reduce dust emissions and naturally occurring asbestos.

During any demolition project in the County, asbestos control is handled with strict adherence to local, State, and federal regulations to ensure public safety and environmental protection. Before demolition begins, a licensed asbestos inspector must survey the site to identify any asbestos-containing materials. If found, the materials are carefully removed by certified abatement professionals using sealed containment areas, negative air pressure systems, and specialized equipment to prevent fiber release.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

MM AIR-3 Prior to discretionary approval by the City of Clovis, project applicants for new development projects that (1) have the potential to generate emissions of toxic air contaminants (TACs) and/or diesel particulate matter (DPM) emissions during construction or operation, and (2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a Health Risk Assessment (HRA) to the City of Clovis for review and approval. The HRA shall be prepared in accordance with policies and procedures of the California Office of Environmental Health Hazard Assessment (OEHHA) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). If the HRA shows that the incremental cancer risk and/or non-cancer hazard index (HI) exceed the respective thresholds, as established by the SJVAPCD at the time a project is considered, the project applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACT), including appropriate enforcement mechanisms, are capable of reducing potential cancer and non-cancer risks to an acceptable level. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

As previously discussed, the timing and intensity of future development projects in the MP Area 2 are not known at this time, and therefore the precise effects of construction and operational activities associated with buildout of MP Area 2 cannot be accurately quantified at this time. In addition, it is unknown at this time what, if any, nearby construction projects would also be occurring concurrently with development of MP Area 2. Construction of a multitude of individual development projects that could occur nearby throughout the buildout period could generate concentrations of TACs and/or DPM emissions that cause adverse health effects. To reduce health risks, MM AIR-3 would be required to be implemented to evaluate and lower (as needed) emissions of and exposure to TACs and/or DPM resulting from future construction- and operational-related activities from the

development of the new residential and nonresidential land uses allowable under MP Area 2. Implementation of MM AIR-3 would reduce health risks from construction-related and operational-related activities to levels below established thresholds, and cumulative impacts would be less than significant with mitigation incorporated

Vista Ranch Development/MP Area 1

The geographic area of this cumulative analysis is a 0.25 mile boundary around MP Area 1 as recommended by SJVAPCD. As noted in Table 3-1, Cumulative Projects List, no projects are planned closer than 0.25 mile of MP Area 1. Any projects developed as a part of MP Area 2 would be required to implement MM AIR-3. As discussed above, an HRA was prepared to evaluate health risk impacts related to DPM emissions from project construction to nearby existing and potential future receptors, and health risks would be below significance thresholds established by SJVAPCD. Therefore, the Vista Ranch Development, in conjunction with past and present projects, would result in a less than significant cumulative impact.

The Vista Ranch Development itself would not introduce new sources of DPM to the area from an operational standpoint. Accordingly, it would not result in a cumulatively considerable contribution to impacts that would expose the public within the geographic area to substantial cumulative pollutant concentrations. Therefore, no cumulative impact would occur.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

Implement project-specific MM AIR-3; no additional mitigation required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Objectionable Odors Exposure

Impact AIR-4:	**The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445

acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the NEUC common public identity. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of MP Area 1, evaluated below. The remaining 139 acres, which comprises MP Area 2, are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. The land uses established within the MP Area 2 would be consistent with those of the Vista Ranch Development, including residential uses, commercial uses, and a school.

Odor impacts could occur if MP Area 2 introduces a new odor source near existing receptors. The SJVAPCD provides a list of recommended odor screening distances for specific odor-generating facilities. According to the SJVAPCD, residential or commercial uses are not odor-generating facilities.

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area surrounding the site. MP Area 2 would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Thus, MP Area 2 would not introduce a new odor source near existing receptors during construction.

MP Area 2 would involve the development of residential and commercial uses; operations could lead to odors from associated vehicle exhaust and waste disposal. However, such odors generated by operation would be small in quantity and duration and would not pose an objectionable odor impact to future and existing receptors. Thus, MP Area 2 would not introduce a new odor source near existing receptors during construction or operation, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Odor impacts could occur if the Vista Ranch Development introduces a new odor source near existing receptors. The SJVAPCD provides a list of recommended odor screening distances for specific odor-generating facilities. According to the SJVAPCD, residential or commercial uses are not odor-generating facilities.

Potential sources that may emit odors during construction activities include exhaust from diesel construction equipment. However, because of the temporary nature of these emissions, the intermittent nature of construction activities, and the highly diffusive properties of diesel PM exhaust, nearby receptors would not be affected by diesel exhaust odors associated with project construction. Odors from these sources would be localized and generally confined to the immediate area

surrounding the site. The Vista Ranch Development would utilize typical construction techniques and the odors would be typical of most construction sites and temporary in nature. Thus, the Vista Ranch Development would not introduce a new odor source near existing receptors during construction.

The Vista Ranch Development would involve the development of residential and commercial uses; operations could lead to odors from associated vehicle exhaust and waste disposal. However, such odors generated by operation would be small in quantity and duration and would not pose an objectionable odor impact to future and existing receptors. Thus, the Vista Ranch Development would not introduce a new odor source near existing receptors during construction or operation, and impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

As discussed above, odor impacts could occur if the proposed project introduces a new odor source near existing receptors. SJVAPCD provides a list of recommended odor screening distances for specific odor-generating facilities. According to the SJVAPCD, residential and commercial uses are not odor-generating facilities. Therefore, the proposed project's contribution to significant cumulative impacts related to odors would not be cumulatively considerable, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.4 - Biological Resources

3.4.1 - Introduction

This section describes the existing biological setting and potential effects from project implementation on the project site and the surrounding area. This section also identifies mitigation measures to avoid, reduce, or compensate for impacts found to be potentially significant. Impacts within Master Plan (MP) Area 1, where biological resources have been studied extensively and the nature of future development is well defined, are analyzed at the project level. Impacts within MP Area 2 and the Non-development Area are analyzed at a more general programmatic level, since less information is available for these areas, the specific details of future development in MP Area 2 are currently unknown, and no development is contemplated within the Non-development Area.

Descriptions and analysis in this section are based, in part, on field surveys performed by Vollmar Natural Lands Consulting (Vollmar), Helm Biological Consulting (HBC), FirstCarbon Solutions (FCS), and ECORP Consulting (ECORP) conducted between 2017 and 2025. Analysis is also taken from technical documentation, including, but not limited to:

- Biological Assessment for Endangered Species Act Section 7 Consultation prepared by Vollmar and revised in October 2025
- Biological Resources Assessment (BRA) prepared by ECORP dated January 23, 2023
- Delineation of Potential Jurisdictional Aquatic Resources (Delineation) prepared by Vollmar (dated August 17, 2023), which was verified by the United States Army Corps of Engineers (USACE) in November 2023
- 2023 90-Day Report: California Tiger Salamander and Listed Large Branchiopods (90-Day Report) prepared by Vollmar in August 2023
- Rare Plant Survey Report prepared by Vollmar in October 2023
- Madera Terrace Conservation Bank: Draft Prospectus prepared by Vollmar, dated November 30, 2021
- Compensatory Mitigation Plan and Mitigation Climate Change Analysis prepared by Redtail Consulting in October 2025
- Supplementary Information for Endangered Species Act Consultation, Western Spadefoot, and Northwestern Pond Turtle Memorandum (Supplementary Memo) prepared by Vollmar, dated July 11, 2024
- Conceptual Mitigation Plan prepared by Redtail Consulting in October 2023
- Dry Soil Analysis for the Detection of Federally-listed Large Branchiopods Report (Dry Soil Analysis Report) prepared by HBC in December 2023

- Mitigation Overview prepared by Redtail Consulting in December 2023
- Application for Incidental Take Authorization prepared by Redtail Consulting and submitted in March 2025

These technical documents are provided in their entirety within Appendix E.

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to biological resources.

- Comment recommending referencing prior California Department of Fish and Wildlife (CDFW) comment letters for additional comments and recommendations for the EIR (pp. 3.4-45 to 3.4-118)
- Comment requesting the Revised Draft EIR reflect the change of State status of burrowing owls and incorporate appropriate mitigation measures to reduce the potential for significant impacts and prevent unauthorized take (pp. 3.4-24; 3.4-56 to 3.4-58)
- Comment requesting reporting of special-status species observations to the California Natural Diversity Database and noting that CDFW filing fees would apply upon project approval (pp. 3.4-45 to 3.4-118)
- Comment stating that the project area contains suitable habitat for numerous special-status wildlife and plant species and recommending conducting appropriate habitat assessments, focused surveys, and impact analyses to support the EIR's biological resources evaluation (pp. 3.4-3 to 3.4-35; 3.4-45 to 3.4-118)
- Comment identifying potential impacts to California tiger salamander and recommending protocol surveys, avoidance and minimization measures, and acquisition of incidental take authorization under the California Endangered Species Act (CESA), if take cannot be avoided (pp. 3.4-49 to 3.4-53; 3.4-76 to 3.4-79)
- Comment noting the project area provides suitable foraging and nesting habitat for Swainson's hawk and recommending nesting surveys and implementation of no disturbance buffers around active nests, with consultation and take authorization if buffers are infeasible (pp. 3.4-66 to 3.4-68; 3.4-73 to 3.4-75; 3.4-84 to 3.4-86)
- Comment indicating potential for tricolored blackbird occurrence and recommending habitat assessment, preconstruction breeding surveys, avoidance buffers around active colonies, and consultation if impacts cannot be avoided (pp. 3.4-68 to 3.4-69; 3.4-73 to 3.4-75; 3.4-84 to 3.4-86)
- Comment stating that suitable habitat may exist for Crotch's bumble bee and recommending habitat assessments, focused surveys, avoidance of nesting features, and consultation or take authorization if necessary (pp. 3.4-53 to 3.4-56; 3.4-79 to 3.4-80)

- Comment noting potential presence of American badger and recommending focused den surveys and implementation of avoidance buffers until dens are inactive (pp. 3.4-69 to 3.4-70; 3.4-86 to 3.4-87)
- Comment identifying the project site as potentially supporting burrowing owl nesting and foraging habitat and recommending surveys and implementation of avoidance buffers consistent with CDFW guidance (pp. 3.4-56 to 3.4-58; 3.4-80 to 3.4-83)
- Comment noting western pond turtle may occur in the project vicinity and recommending focused surveys, avoidance of nests, and minimization of disturbance during construction (pp. 3.4-59; 3.4-83)
- Comment stating that suitable habitat may exist for western spadefoot and recommending focused surveys, avoidance buffers around burrows, and incorporation of mitigation where impacts occur (pp. 3.4-60 to 3.4-32; 3.4-83 to 3.4-84)
- Comment identifying potential for special-status plant species and recommending floristic surveys conducted in accordance with CDFW protocols and avoidance or mitigation if such species are present (pp. 3.4-47 to 3.4-48; 3.4-71 to 3.4-72; 3.4-74 to 3.4-75)
- Comment recommending evaluation of impacts related to streambed alteration, artificial lighting effects on wildlife, wildlife movement and habitat connectivity, and cumulative biological impacts (pp. 3.4-45 to 3.4-118)
- Comment requesting the Revised Draft EIR disclose, analyze, and mitigate impacts to wildlife movement and habitat connectivity (pp. 3.4-100 to 3.4-102)
- Comment requesting the Revised Draft EIR disclose, analyze, and mitigate impacts to special-status species (pp. 3.4-108 to 3.4-113)
- Comment(s) stating concerns related to the destruction of animal habitats, including California tiger salamander (CTS), fox, coyote, owls, and hawks (pp. 3.4-45 to 3.4-92)

  Comment(s) stating concerns related to loss of habitat/nature, especially for CTS (pp. 3.4-45 to 3.4-118)

3.4.2 - Environmental Setting

Regional Setting

The City and the Sphere of Influence (SOI) Expansion Area lie in the southeast portion of the State's Great Valley Geomorphic Province, an elongate trough bounded to the west by the Coast Ranges and to the east by the Sierra Nevada and floored by a thick accumulation of alluvial sediments. The Great Valley lowland encompasses the Sacramento Valley to the north and the San Joaquin Valley to the south and is drained by the Sacramento and San Joaquin River systems, which meet at the Sacramento–San Joaquin Delta to join San Francisco Bay.[1]

[1] Norris, R.M., and Webb, R.W. 1990. Geology of California. (2nd Edition.) John Wiley & Sons, New York, NY.

The United States Geological Survey (USGS) considers the Great Valley trough a distinct ecozone, referred to as the Central California Valley ecoregion and set apart from neighboring mountainous regions by its flat plains and a climate of long, hot, dry summers and mild winters. Historically, the Central Valley ecoregion supported extensive prairies, oak savannas, riparian woodlands, freshwater marshlands, and vernal pools, with desert grasslands present in the south. Currently, more than 50 percent of the region is croplands, most of which are irrigated.[2,3]

The SOI Expansion Area is within the Southern Hardpan Terraces subregion of the Central California Valley ecoregion. Extending along the east margin of the San Joaquin Valley, this subregion is situated on gently sloping terraces, floodplains, and alluvial fans at elevations of 150 to 500 feet. Regional drainage is toward the San Joaquin River or closed basins within the San Joaquin Valley. Soil temperature regimes are thermic; soil moisture regimes are xeric to aridic. In undeveloped areas, characteristic vegetation includes annual grasslands, *Ceanothus* shrublands, and blue oak (*Quercus douglasii*) savannas, with scattered stands of foothill pine (*Pinus sabiniana*) in draws and on protected slopes. Vernal pools are also characteristic.[4]

Similar to the USGS, University of California Berkeley's Jepson Herbarium recognizes the Sacramento and San Joaquin Valleys as distinct floristic subregions within the Great Valley. The San Joaquin Valley subregion, where the City and SOI Expansion Area are located, is generally drier and warmer than the Sacramento Valley.[5] Over the last several decades, typical annual rainfall in the greater Fresno/Clovis area has been just under 11 inches, most of which falls between October and April. Summer daytime temperatures can approach or exceed 100°F (degrees Fahrenheit). Winter daytime temperatures are moderate at 55 to 70°F, with nights largely in the 40 to 50°F range.[6]

Local Setting

Habitat Conditions and Wildlife Use

MP Area 1

Overview

As shown in Exhibit 3.4-1, MP Area 1 is bordered to the south and west by suburban residential development and to the northwest by more open rural residential development. To the northeast, MP Area 1 abuts open rangeland and the Big Dry Creek Dam and Reservoir, which are flood control structures operated by the Fresno Metropolitan Flood Control District (FMFCD). MP Area 1 is bisected by the Big Dry Creek Reservoir Outlet Works Channel (Outlet Channel), a constructed canal

[2] Griffith, G.E., Omernik, J.M., Smith, D.W., Cook, T.D., Tallyn, E., Mosely, K., and Johnson, C.B. 2016. Ecoregions of California. U.S. Geological Survey Open-File Report 2016-1021. Website: https://pubs.usgs.gov/publication/ofr20161021. Accessed October 21, 2025.

[3] Jepson Flora Project. 2024. Geographic Subdivisions of California. Website: https://ucjeps.berkeley.edu/eflora/geography.html. Accessed October 21, 2025.

[4] Griffith, G.E., Omernik, J.M., Smith, D.W., Cook, T.D., Tallyn, E., Mosely, K., and Johnson, C.B. 2016. Ecoregions of California. U.S. Geological Survey Open-File Report 2016-1021. Website: https://pubs.usgs.gov/publication/ofr20161021. Accessed October 21, 2025.

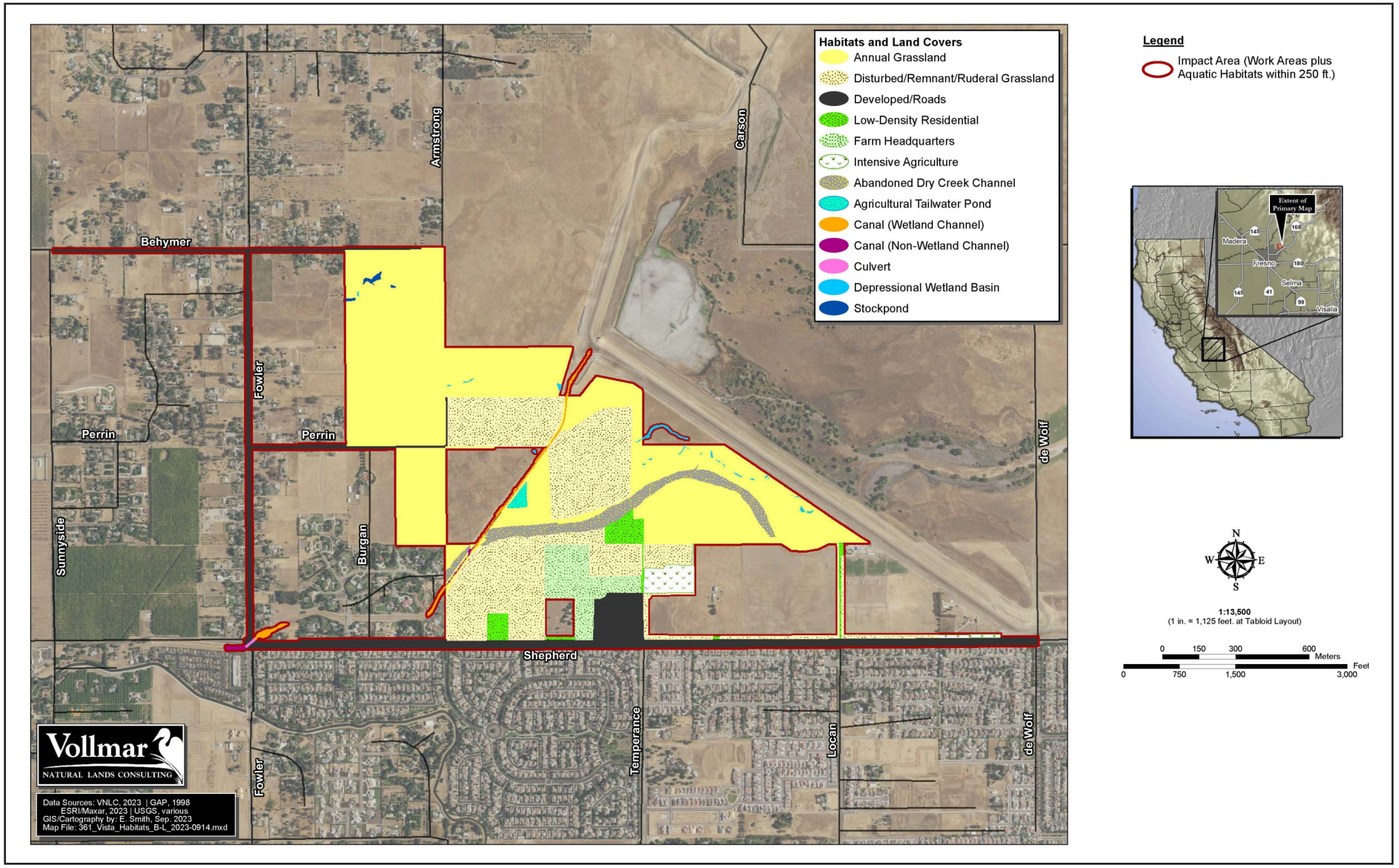
[5] Jepson Flora Project. 2024. Geographic Subdivisions of California. Website: https://ucjeps.berkeley.edu/eflora/geography.html. Accessed October 21, 2025.

[6] National Weather Service. Monthly Climate Normals (1991–2020) – Fresno Area, CA. Website: https://www.weather.gov/wrh/Climate?wfo=hnx. Accessed November 6, 2025.

that conveys discharges from the Big Dry Creek Dam spillway. When the reservoir was constructed, the natural Big Dry Creek drainage was re-routed into the reservoir basin; flow now exits via the spillway and is conveyed via the Outlet Channel to rejoin Big Dry Creek approximately 2,500 feet below the spillway. The truncated and abandoned channel of Big Dry Creek remains a conspicuous feature in the east-central portion of MP Area 1 but no longer conveys flow.[7] The remnant Big Dry Creek channel within MP Area 1 exhibits intermittent stream geomorphology but lacks an ordinary high water mark (OHWM). It does not have hydric soils and supports only upland vegetation.[8]

[7] Vollmar Natural Lands Consulting (Vollmar). 2023. Delineation of Potential Jurisdictional Aquatic Resources. November.
[8] Vollmar, J. Vollmar Natural Lands Consulting (Vollmar). Personal communication. Telephone conversations with Anna Buising, Redtail Consulting. June to August 2023.

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Source: Vollmar Natural Lands Consulting, 2023.

Exhibit 3.4-1
Habitat and Land Cover in MP Area 1

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The topography of MP Area 1 is level to gently rolling, with elevations ranging from approximately 380 to 413 feet above mean sea level (AMSL). The most pronounced slopes are in the northwest portion of MP Area 1. Soils appear to lack intact claypan or hardpan, which likely contributes to relatively rapid infiltration throughout much of MP Area 1, with a correspondingly low rate of wetland formation even within some depressional features.[9]

The majority of MP Area 1 is non-native annual grassland and degraded pasture land (Exhibit 3.4-1). The northeast and southeast portions of MP Area 1 appear not to be grazed at present, and grasslands there support a mixture of primarily non-native annual grasses and herbs, including invasive weeds. Scattered depressional wetlands are present within the grasslands, especially along the northeast edge of MP Area 1, where they occupy a series of what appear to be remnant floodplain swales north of the abandoned Big Dry Creek channel and are apparently fed in part by seepage from the Big Dry Creek Reservoir in heavy rain years. Three created stock ponds and small depressional wetlands are also present within the grasslands in the northwest portion of MP Area 1.[10]

The central portion of MP Area 1 was graded for flood irrigation several decades ago, although flood irrigation is not practiced at this time. This area is divided into several pastures with cross fencing and is at least intermittently used for grazing. It supports degraded pasture with ruderal vegetation dominated by non-native grasses and herbs, including invasive weeds. Scattered rural/agricultural development features are also present. Current grazing use appears to be light, leading to the build-up of thatch and residual dry matter. A triangular pond located adjacent to the Outlet Channel was apparently constructed in uplands to capture and allow reuse of irrigation water, although it also has a culverted connection to the Outlet Channel.[11]

MP Area 1 is used by common wildlife species typical of the region, including species of grasslands and wetlands, as well as urban-adapted species. Individuals or sign of the following species have been observed: coyote (*Canis latrans*), raccoon (*Procyon lotor*), Botta's pocket gopher (*Thomomys bottae*), Turkey Vulture (*Cathartes aura*), Red-tailed Hawk (*Buteo jamaicensis*), Mallard (*Anas platyrhynchos*), House Sparrow (*Passer domesticus*), House Finch (*Haemorhous mexicanus*), western fence lizard (*Sceloporus occidentalis*), common side-blotched lizard (*Uta stansburiana*), Pacific chorus frog (*Pseudacris regilla* [*P. sierra*]) western toad (*Bufo* [*Anaxyrus*] *boreas*), American bullfrog (*Rana catesbeiana* [*Lithobates catesbeianus*]), and other widespread generalists.[12]

Aquatic Resources and Sensitive Natural Communities

A total of approximately 3.053 acres of State- and federally jurisdictional waters[13] has been mapped on MP Area 1 (Exhibit 3.4-2). This includes approximately 1.646 acres of wetlands and 0.278 acre of

[9] Vollmar Natural Lands Consulting (Vollmar). 2023. Delineation of Potential Jurisdictional Aquatic Resources. November.
[10] Ibid.
[11] Ibid.
[12] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.
[13] As noted above, the jurisdictional delineation for MP Area 1 was verified by the United States Army Corps of Engineers (USACE) in November 2023. All wetlands and other waters within MP Area 1 are presumed to be both State- and federally jurisdictional.

other waters (canal/Outlet Channel).[14] The agricultural tailwater pond (approximately 1.129 acres)[15] is also being treated as a jurisdictional feature. Other than the delineated wetlands and other waters, no sensitive natural communities[16] are present within MP Area 1.[17]

MP Area 2 and Non-development Area

Exhibit 3.4-3 is an aerial photograph view of the SOI Expansion Area, showing general habitat conditions in MP Area 2 and the Non-development Area.

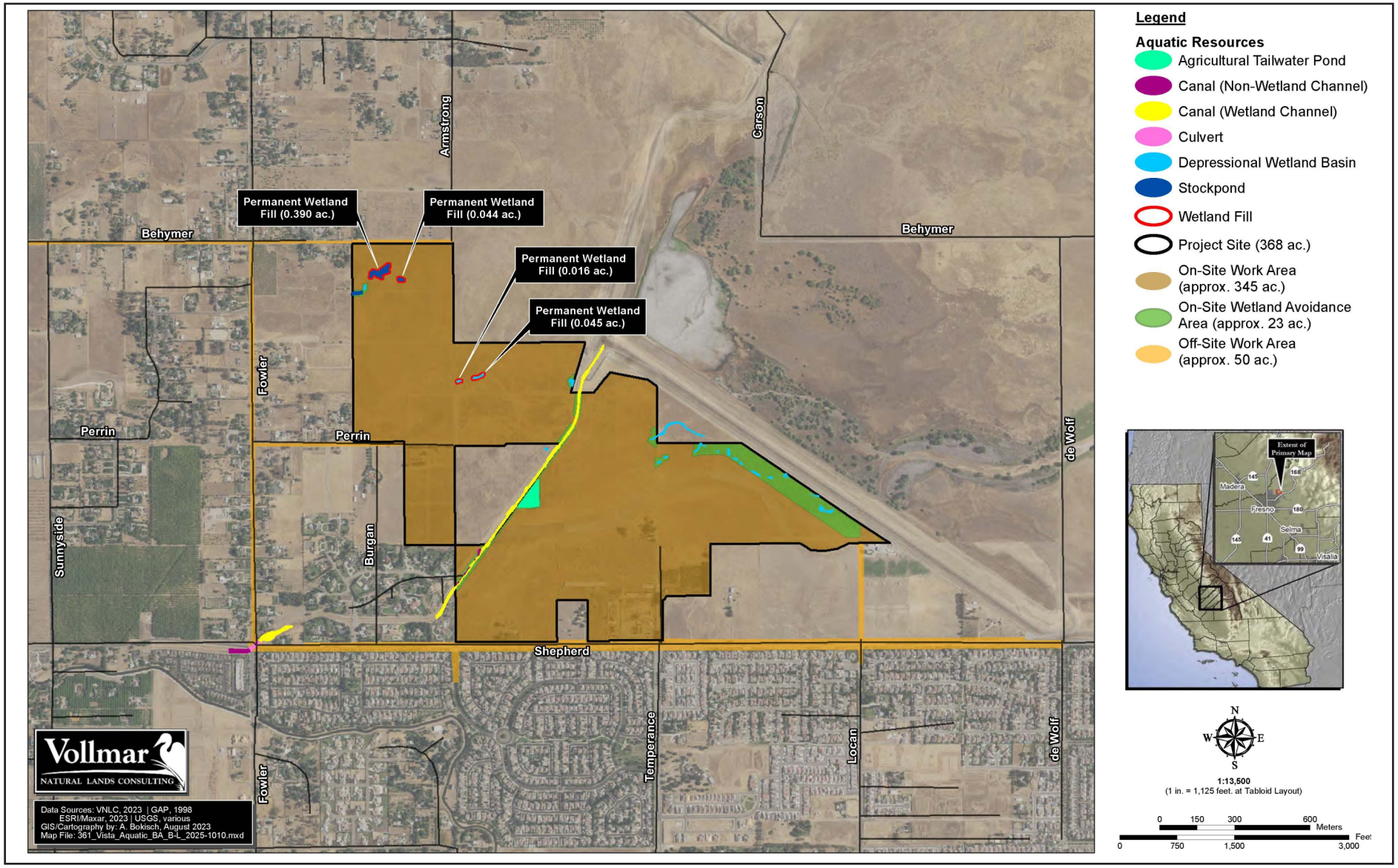
The south and southeast portions of MP Area 2 consist of former agricultural lands with scattered agricultural structures. Current uses of these parcels include orchard, tree nursery, horse paddock, and dry pasture/hay field.[18] One parcel is operating as a mini-storage facility, which previously underwent CEQA review and was entitled by the County of Fresno (County).

The roughly triangular segment of MP Area 2 in the approximate center of the Master Plan Area appears to have been cultivated in the past but preserves rolling mima-like topography that may support local depressional wetlands and/or vernal pools in some areas. A portion of the abandoned Big Dry Creek channel is also preserved in this area (Exhibit 3.4-3).

The portion of the Non-development Area west of MP Area 1 is dominated by suburban and semi-rural/rural development. Immediately abutting the west boundary of MP Area 1 are remnant agricultural lands, including open cultivated fields to the south and grazing land and orchards to the north. Topography in this area is gently rolling and may support localized development of seasonal and/or vernal pool wetlands.

The portion of the Non-development Area north of MP Area 1 consists of undeveloped grassland west of the Big Dry Creek Reservoir, which does not appear to have been cultivated. Topography in this area is also gently rolling and may support localized wetland development.

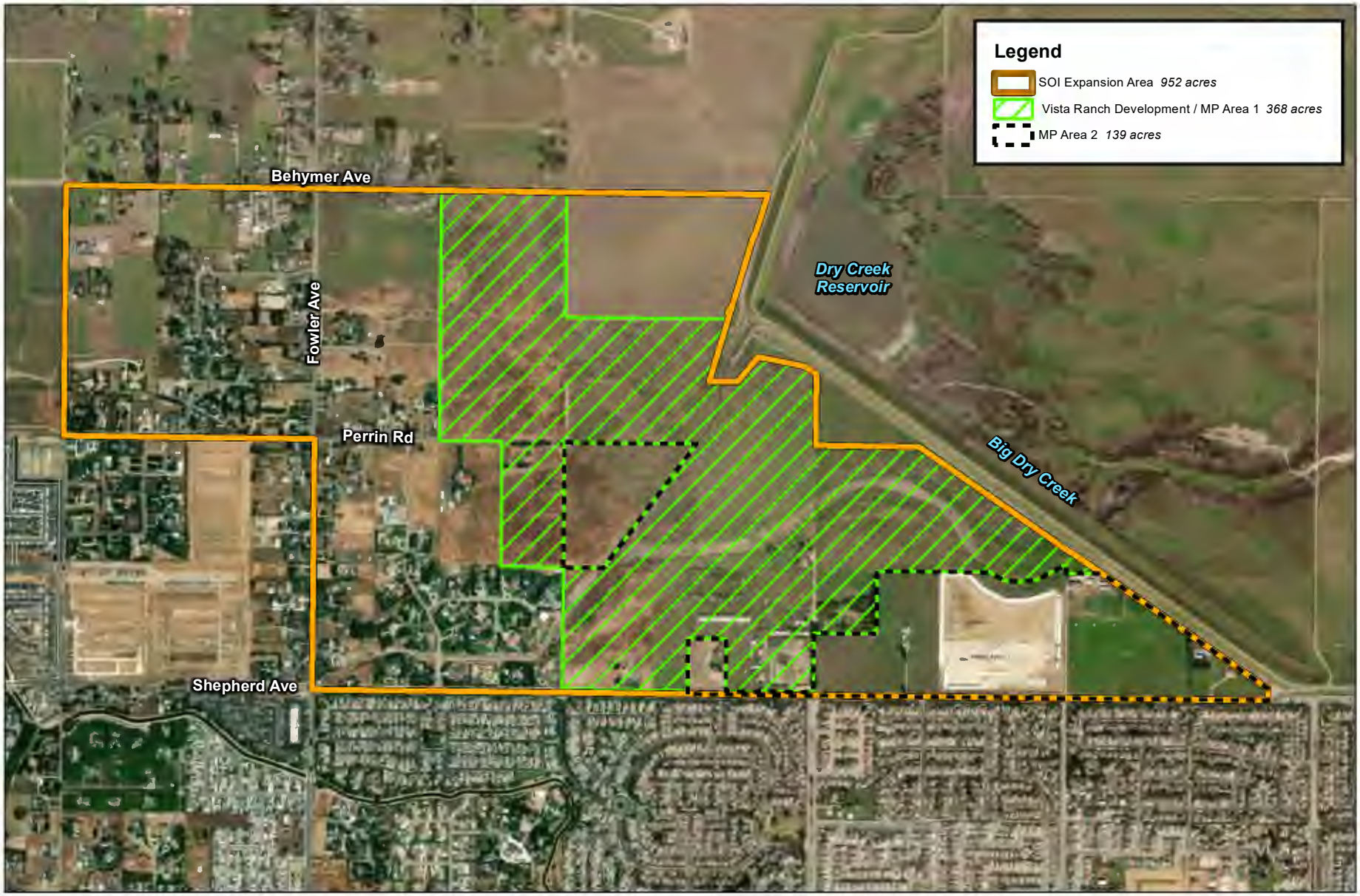
[14] Vollmar Natural Lands Consulting (Vollmar). 2023. Delineation of Potential Jurisdictional Aquatic Resources. November.
[15] Ibid.
[16] Sensitive natural communities refer to vegetation types ranked S1–S3 by the California Department of Fish and Wildlife's (CDFW's) vegetation classification and mapping program, reflecting a comparatively high level of rarity and threat. In the project region, they include communities such as Valley oak woodland and forest, and various riparian and vernal pool habitats.
[17] Vollmar Natural Lands Consulting (Vollmar). 2023. Rare Plant Survey Report. October.
[18] Vollmar Natural Lands Consulting (Vollmar). 2023. Delineation of Potential Jurisdictional Aquatic Resources. November.



Source: Vollmar Natural Lands Consulting, 2023, updated 05/12/2026.

Exhibit 3.4-2
Aquatic Resources in MP Area 1

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Source: ESRI Aerial Imagery. City of Clovis. Harbour & Associates Civil Engineers, 08/21/2025.

1,500 750 0 1,500 Feet

Exhibit 3.4-3
Aerial View of Conditions in SOI Expansion Area

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Similar to MP Area 1, MP Area 2 and the Non-development Area are likely used by a variety of wildlife species typical of the region, depending on the current land use and conditions of the parcels. The more modified parcels in the south and east likely support primarily urban-adapted species, such as House Sparrow, House Finch, Northern Mockingbird (*Mimus polyglottos*), and Rock Dove (*Columba livia*), with occasional visits from human-tolerant species, such as coyote, as well as feral animals such as house cat (*Felis catus*). The undeveloped area to the north likely supports a wider range of native species adapted to grassland and vernal pools, such as Western Meadowlark (*Sturnella neglecta*), black-tailed jackrabbit (*Lepus californicus*), California ground squirrel (*Otospermophilus beecheyi*), Pacific chorus frog, and gopher snake (*Pituophis catenifer*).

Special-status Species Use

MP Area 1

Protocol-level rare plant surveys of MP Area 1 were conducted during the 2023 blooming season. No special-status plants were detected during the surveys, [19] although a number of special-status plants have the potential to be present, as detailed in Table 3.4-1.[20, ,21] Several special-status wildlife species have been observed within MP Area 1 and are known to be present, as listed in Table 3.4-2. Numerous other special-status wildlife species have not been observed on-site in MP Area 1 but have at least some potential to be present based on their documented range and the habitat MP Area 1 offers (Table 3.4-3). Additional wildlife species known from the region were also considered but were evaluated as not expected to be present, either based on their known ranges, a lack of suitable habitat on-site, or both (Table 3.4-4).[22]

[19] Vollmar Natural Lands Consulting (Vollmar). 2023. Rare Plant Survey Report. October.
[20] A number of other special-status plants known from the project region were also considered and are not expected to be present within MP Area 1 based on their distribution, habitat requirements, and/or elevation constraints.
[21] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.
[22] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

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Table 3.4-1: Special-Status Plants with Potential to be Present in MP Area 1

Species	Status[1] (CA/Fed/CRPR)	Habitat and Blooming Period	Potential to Be Present
Brassy bryum *Bryum chryseum*	—/—/4.3	Oak woodlands, grasslands, chamise chaparral at elevations of approximately 165 to 1,970 feet; no blooming period since this is not a flowering plant	**Low.** Grasslands in MP Area 1 may provide suitable habitat. CNDDB records no relevant occurrences.
Hoover's calycadenia *Calycadenia hooveri*	—/—/1B.3	Foothill woodlands, valley grasslands, rocky exposed places, oak savannas at elevations of approximately 328 to 1,312 feet; blooms July to September	**Low.** MP Area 1 does not offer suitable rocky habitat. The nearest documented occurrence (2007) is approximately 9.8 miles away.
Bristly sedge *Carex comosa*	—/—/2B.1	Lake margins and edges, freshwater wetlands, wetland and riparian areas at elevations below approximately 1,312 feet; blooms May to September	**Low.** Mesic areas in MP Area 1 may provide suitable habitat, but there are few occurrences in the vicinity; the nearest documented occurrence (1989) is approximately 32.4 miles away.
Succulent owl's-clover *Castilleja campestris* ssp. *succulenta*	SE/FT/1B.1	Vernal pools, freshwater wetlands, foothill woodlands, valley grasslands, wetland, and riparian areas at elevations below approximately 2,460 feet; blooms April to May	**Low.** MP Area 1's seasonal wetlands may provide marginal habitat, but this species typically occurs in large vernal pools with high native richness and diversity, which are lacking from this area. The nearest documented occurrence (2008) is approximately 3.1 miles away.
California jewelflower *Caulanthus californicus*	SE/FE/1B.1	Shadescale scrub, valley grasslands, pinyon-juniper woodland, flats, slopes, non-alkaline grasslands at elevations of approximately 230 to 2,381 feet; blooms February to May	**Low.** The only documented occurrence in the vicinity is approximately 8.2 miles away from the late 1890s or early 1900s.
Ewan's larkspur *Delphinium hansenii* ssp. *ewanianum*	—/—/4.2	Foothill woodlands, valley grasslands, oak woodlands at elevations of approximately 197 to 1,969 feet; blooms March to May	**Potential.** Grasslands in MP Area 1 may provide suitable habitat. The nearest occurrence is located in the United States Geological Survey (USGS) *Friant, California* 7.5-minute quadrangle; exact location and date not available.

Species	Status[1] (CA/Fed/CRPR)	Habitat and Blooming Period	Potential to Be Present
Dwarf downingia *Downingia pusilla*	—/—/2B.2	Vernal pools, freshwater wetlands, foothill woodlands, valley grasslands, wetland and riparian areas, roadside ditches at elevations below approximately 490 feet; blooms March to May	**Low.** MP Area 1 is just outside the species' known geographic range, but seasonal wetlands and other mesic areas on-site may provide marginal habitat. The nearest documented occurrence (1979) is approximately 4.2 miles away.
Spiny-sepaled button-celery *Eryngium spinosepalum*	—/—/1B.2	Vernal pools, freshwater wetlands, valley grasslands, wetland and riparian areas, swales, roadside ditches at elevations below approximately 4,167 feet; blooms April to May	**Potential.** Aquatic features on-site may provide suitable habitat. Nearest documented occurrence (2010) is approximately 8.5 miles away.
Boggs Lake hedge-hyssop *Gratiola heterosepala*	SE/—/1B.2	Lake margins, vernal pools, freshwater wetlands, wetland and riparian areas, shallow waters at elevations below approximately 5,249 feet; blooms April to August	**Low.** Aquatic features on-site may provide marginally suitable habitat. The nearest documented occurrence (1994) is approximately 13.6 miles away.
Hogwallow starfish *Hesperevax caulescens*	—/—/4.2	Wetlands, foothill woodlands, valley grasslands, drying shrink-swell clays of vernal pools, flats, steep slopes at elevations below approximately 984 feet; blooms March to June	**Low.** MP Area 1's seasonal wetlands may provide very marginal habitat. The nearest occurrences are extant, from the Four Corners area near Madera.
Forked hare-leaf *Lagophylla dichotoma*	—/—/1B.1	Foothill woodlands, valley grasslands, woodland openings woodlands at elevations of approximately 50 to 1,312 feet; blooms April to June	**Potential.** Grasslands on-site may provide suitable habitat. The nearest documented occurrence (2010) is approximately 10.8 miles away.
Hoary navarretia *Navarretia eriocephala*	—/—/4.3	Foothill woodlands, valley grasslands, wetland and riparian areas, on heavy soils of seasonally wet flats at elevations below	**Low.** MP Area 1 is just outside the species' known geographic range, but the seasonal wetlands and other mesic areas on-site may provide suitable habitat. The nearest occurrence is located

Species	Status[1] (CA/Fed/CRPR)	Habitat and Blooming Period	Potential to Be Present
		approximately 1,312 feet; blooms May – June	in the USGS *Millerton Lake East, California* 7.5-minute quadrangle; the exact location and date are not available.
Pincushion navarretia *Navarretia myersii* ssp. *myersii*	—/—/1B.1	Vernal pools, freshwater wetlands, valley grasslands, wetland and riparian areas at elevations of approximately 66 to 295 feet; blooms April to May	**Low.** MP Area 1 is just outside the species' known geographic range, but seasonal wetlands on-site may provide suitable habitat. The nearest documented occurrence (2016) is approximately 10 miles away.
Adobe navarretia *Navarretia nigelliformis* ssp. *nigelliformis*	—/—/4.2	Wetlands; occasionally in non-wetland settings, vernal pools, clay depressions; at elevations of approximately 33 to 3,281 feet; blooms April to June	**Low.** MP Area 1's seasonal wetlands may provide very marginal habitat. The nearest occurrences are extant from the Four Corners area near Madera.
San Joaquin Valley Orcutt grass *Orcuttia inaequalis*	SE/FT/1B.1	Vernal pools, freshwater wetlands, valley grasslands, wetland and riparian areas at elevations below approximately 1,312 feet; blooms April to September	**Low *(assessment conservative due to species' status)*.** MP Area 1's seasonal wetlands may provide very marginal habitat. The nearest document occurrence (1987) is approximately 1.3 miles away.
Hairy Orcutt grass *Orcuttia pilosa*	SE/FE/1B.1	Vernal pools, freshwater wetlands, valley grasslands, wetland and riparian areas at elevations below approximately 656 feet; blooms May to September	**Low *(assessment conservative due to species' status)*.** MP Area 1's seasonal wetlands may provide very marginal habitat. The nearest documented occurrence (2010) is approximately 9.8 miles away.
Wine-colored tufa moss *Plagiobryoides vinosula*	—/—/4.2	Usually on granitic rock or granitic soils along seeps and streams, sometimes on clays, at elevations of 100 – 5,695 feet; no blooming period since this is not a flowering plant	**Low.** MP Area 1 provides some areas with granitic soils, but they are not located along streams or seeps. The nearest occurrence is located in the USGS *Millerton Lake East* 7.5' quadrangle; the exact location and date are not available.
Hartweg's golden sunburst *Pseudobahia bahiifolia*	SE/FE/1B.1	Foothill woodlands, valley grasslands, open woodlands, on clay soils, at elevations of approximately 328 to 656 feet; blooms March to April	**Low *(assessment conservative due to species' status)*.** The species is strongly associated with mima-mound topography on clay or volcanic soils, which are absent from MP Area 1. The

Species	Status[1] (CA/Fed/CRPR)	Habitat and Blooming Period	Potential to Be Present
			nearest documented occurrence (2009) is approximately 8 miles away.
San Joaquin adobe sunburst *Pseudobahia peirsonii*	SE/FT/1B.1	Foothill woodlands, valley grasslands, bare dark clays at elevations of approximately 328 to 2,953 feet; blooms March to April	**Low *(assessment conservative due to species' status)*.** The species is strongly associated with bare, dark clay soils, which are absent from MP Area 1. The nearest documented occurrence (2010) is approximately 7.1 miles away.
Sanford's arrowhead *Sagittaria sanfordii*	—/—/1B.2	Freshwater marshes, freshwater wetlands, riparian areas, ponds, ditches, at elevations below approximately 984 feet; blooms May to October	**Low.** The stock ponds, tailwater pond, and Outlet Channel may provide marginal habitat. The nearest documented occurrence (2008) is approximately 5.7 miles away.
Greene's tuctoria *Tuctoria greenei*	CR/FE/1B.1	Vernal pools, freshwater wetlands, valley grasslands, wetland and riparian areas at elevations below approximately 3,245 feet; bloom May to July	**Low *(assessment conservative due to species' status)*.** MP Area 1's seasonal wetlands may provide very marginal habitat. The nearest documented occurrence (1987) is approximately 1.8 miles away.

Notes:
CNDDB = California Natural Diversity Database
CRPR = California Rare Plant Rank
FE = Federally listed as Endangered
FP = State Fully Protected
FT = Federally listed as Threatened
MP = Master Plan
SE = State-listed as Endangered
SR = State-designated as Rare
SSC = CDFW Species of Special Concern
USGS = United States Geological Survey
WL = CDFW Watch List species

CRPR Ranks:
1A = Plants presumed extinct in California and rare/extinct elsewhere
1B = Plants rare, threatened, or endangered in California and elsewhere

Species	Status[1] (CA/Fed/CRPR)	Habitat and Blooming Period	Potential to Be Present

2A = Plants presumed extirpated in California, more common elsewhere
2B = Plants rare, threatened, or endangered in California, more common elsewhere
3 = Plants about which more information is needed
4 = Plants of limited distribution

CRPR Subranks:
.1 = seriously threatened in California
.2 = fairly threatened in California
.3 = not very threatened in California

Source: Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation.

Table 3.4-2: Special-Status Wildlife Species Known to be Present in MP Area 1

Species	Status	Habitat Use
Crotch's bumble bee *Bombus crotchii*	—/SCE	Two individuals were observed foraging in MP Area 1 during species-specific surveys conducted in April 2024
Vernal pool fairy shrimp (VPFS) *Branchinecta lynchi*	FT	MP Area 1's seasonal wetlands provide suitable habitat for VPFS and may provide suitable habitat for midvalley fairy shrimp. Protocol-level dry season surveys conducted in 2023 found cysts belonging to the genus *Branchinecta*. Protocol-level wet season surveys conducted in early 2024 confirmed the presence of *B. lynchi*; *B. mesovallensis* may also be present but has not been confirmed to date.
Midvalley fairy shrimp *Branchinecta mesovallensis*	—	
California linderiella *Linderiella occidentalis*	—	Seasonal wetlands and ponds in MP Area 1 provide suitable habitat, and species' presence was confirmed by protocol-level dry season surveys in 2023.
California tiger salamander (CTS) *Ambystoma californiense*	FT, ST	The species has been documented as breeding on-site and is expected to use upland habitats for dispersal and aestivation.
Western spadefoot *Spea hammondii*	FC, SSC	The species has been documented as breeding on-site and is expected to use upland habitats for dispersal and aestivation.

Species	Status	Habitat Use
Cooper's hawk *Accipiter cooperii*	WL	The species has been observed foraging just off-site near Perrin Road, and MP Area 1 offers suitable nesting and foraging habitat; the species is presumed to use MP Area 1.
White-tailed kite *Elanus leucurus*	FP	The species has been observed foraging within MP Area 1. MP Area 1 offers suitable nesting and foraging habitat.

Notes:
FC = candidate for federal listing
FP = State Fully Protected species
FT = federally listed as threatened
MP = Master Plan
SCE = candidate for State listing as endangered
SSC = State Species of Special Concern
ST = State-listed as threatened
WL = State Watch List species

Sources:
Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation.
Helm Biological Consulting (HBC). 2023. Dry Soil Analysis Report.
Smith, E. Vollmar Natural Lands Consulting (Vollmar). Personal communication: phone call with Anna Buising at Redtail Consulting. April 4, 2024.

Table 3.4-3: Additional Special-Status Wildlife Species with Potential to be Present in MP Area 1

Species	Status (Fed/State)	Habitat	Potential to Occur
Invertebrates			
Monarch butterfly *Danaus plexippus*	FC/—	Found throughout most of North America in prairies, meadows, grasslands, and along roadsides	**Low.** No milkweed (species' preferred host plant) have been observed in MP Area 1.
Antioch efferian robber fly *Efferia antiochi*	—/—	Known only from Antioch, Fresno, and Scout Islands in San Joaquin River. Little is known about this species, but other robber flies are insect predators,	**Potential.** MP Area 1 is within species' range. The nearest documented occurrence (1935) is approximately 11.2 miles away.

Species	Status (Fed/State)	Habitat	Potential to Occur
		and larvae usually develop in the ground or in rotting wood	
Molestan blister beetle *Lytta molesta*	—/—	Known only from the Central Valley, ranging from Contra Costa south to Kern and Tulare Counties. Found in grasslands or chaparral habitat	**Potential.** MP Area 1 is within the species' range. The nearest documented occurrence (1980) is approximately 12.7 miles away.
Amphibians and Reptiles			
Northern California legless lizard *Anniella pulchra*	—/SSC	Occurs in moist warm loose soil with plant cover, sparsely vegetated areas of beach dunes, chaparral, pine-oak woodlands, desert scrub, sandy washes, and stream terraces with sycamores, cottonwoods, or oaks	**Very Low.** Habitat in MP Area 1 is marginally suitable, and the nearest documented occurrence (2000) is approximately 43 miles away.
Western pond turtle *Emys marmorata*	FC/SSC	Found in ponds, lakes, rivers, streams, creeks, marshes, and irrigation ditches that offer abundant vegetation and either rocky or muddy bottoms, in woodland, forest, and grassland settings. In streams, it prefers pools to shallower areas. Requires logs, rocks, cattail mats, and/or exposed banks for basking	**Potential.** MP Area 1 offers suitable habitat, and the nearest documented occurrence (2016) is approximately 0.8 mile away.
Coast horned lizard *Phrynosoma blainvillii*	—/SSC	Inhabits open areas with sandy soil and low vegetation in valleys, foothills, and semiarid mountains. Found in a wide variety of setting, often near anthills where it feeds on ants	**Potential.** MP Area 1 offers suitable habitat. The nearest documented occurrence (2011) is approximately 39.8 miles away .
Birds			
Tricolored blackbird *Agelaius tricolor*	—/ST, SSC	Nests in dense stands of cattail or tules in freshwater marshes; forages in fields, farmlands, pastures, and large open lawns	**Potential.** MP Area 1 offers suitable foraging habitat but lacks nesting habitat. Nearby Big Dry Creek Reservoir likely offers nesting opportunities. The nearest documented

Species	Status (Fed/State)	Habitat	Potential to Occur
			occurrence (1974) is approximately 3.4 miles away.
Golden eagle *Aquila chrysaetos*	—/FP, WL	Requires open terrane; found in open mountains, foothills, and plains throughout much of North America. In the north and west, found over tundra, prairie, rangeland, or desert. Very wide-ranging in winter, more restricted to areas with good nest sites in summer	**Potential.** MP Area 1 offers suitable open foraging habitat but does not offer nesting opportunities. The nearest documented occurrence (1985) is approximately 18.8 miles away.
Western Burrowing owl *Athene cunicularia*	SSC	Occurs in open grassland, prairies, farmland, airfields, and a variety of open areas within development. Favors areas of flat open ground with very short grass or bare soil; requires rodent burrows for nesting	**Potential.** MP Area 1 offers suitable foraging habitat and nest burrows. The nearest documented occurrence (1990) is approximately 8.2 miles away.
Ferruginous hawk *Buteo regalis*	—/WL	Found in dry open country: plains, prairies, grasslands, saltbush and greasewood flats, rangelands, deserts; in the winter, uses agricultural land	**Low.** MP Area 1 offers minimal nesting habitat but may support suitable foraging habitat. The nearest occurrence (recently sighted) is in the Four Corners area near Madera.
Swainson's hawk *Buteo swainsoni*	—/ST	Found in plains, dry grasslands, farmlands, ranch country. Breeds most commonly on northern Great Plains, on prairie with scattered groves of trees for nesting. Less common in dry grassland farther west and in heavily farmed country. In migration, often pauses in fields where insect larvae have been turned up by cultivation	**Potential.** MP Area 1 offers suitable foraging and nesting habitat. The nearest documented occurrence (2017) is approximately 16.3 miles away.
California horned lark *Eremophila alpestris actia*	—/WL	Inhabits open ground, generally avoiding areas with trees or bushes. May occur in a wide variety of open settings: short-grass prairies, extensive lawns (e.g.,	**Potential.** MP Area 1 provides suitable nesting and foraging habitat. The nearest documented occurrence (1992) is approximately 7 miles away.

Species	Status (Fed/State)	Habitat	Potential to Occur
		airports, golf courses), plowed fields, stubble fields, beaches, lake flats, dry tundra	
Prairie falcon *Falco mexicanus*	—/WL	Typically found in fairly dry open country, including grasslands open hills, plains, prairies, and deserts. Also, found in open country above tree line in high mountains. In winter, often found in farmland and around lakes and reservoirs	**Low.** MP Area 1 offers potential foraging habitat but no nesting habitat. The nearest documented occurrence (1985) is approximately 10.9 miles away.
California condor *Gymnogyps californianus*	FE/SE	Prefers wild open country, rugged hills. Historically ranged over much of the west, from mountains and valleys to the coast, foraging over open grassland and savanna, and nesting forested mountainous terrain with steep cliffs	**Potential.** MP Area 1 offers suitable foraging habitat but lacks nesting habitat. The nearest documented occurrence (1976) is approximately 61.8 miles away
Bald eagle *Haliaeetus leucocephalus*	DL/SE, FP	Found along coasts, rivers, large lakes; in migration, also occurs in mountains and open country. Typically seen close to water where pretty is abundant, also locally in open dry country. Winters in some very dry western valleys.	**Low.** MP Area 1 offers marginal foraging habitat but no nesting habitat. The nearby Big Dry Creek Reservoir likely offers suitable foraging habitat during wet season. The nearest documented occurrence (2000) is approximately 27 miles away.
Loggerhead shrike *Lanius ludovicianus*	—/SSC	Requires semi-open country with lookout posts such as wires, trees, and scrub; breeds in a wide range of open settings, from large clearings in wooded regions to open grassland or desert with a few scattered trees or large shrubs. In winter, may occupy treeless country if fences or wires provide hunting perches	**Potential.** MP Area 1 provides suitable nesting and foraging habitat. The nearest documented occurrence (1992) is approximately 71 miles away.

Species	Status (Fed/State)	Habitat	Potential to Occur
Mammals			
Pallid bat *Antrozous pallidus*	—/SSC	Found in deserts, grasslands, oak forests, pine forests, scrub forest, farmlands. Roost in caves, rock crevices, mines, hollow trees, and buildings	**Potential.** Suitable roosting habitat is present in MP Area 1. The nearest documented occurrence (1979) is approximately 18 miles away.
Townsend's big-eared bat *Corynorhinus townsendii*	—/SSC	Found in conifer forests, mixed mesophytic forests, deserts, native prairies, riparian communities, active agricultural areas, and coastal habitats; caves, mines, abandoned buildings, and under bridges	**Low.** Marginal roosting habitat is present in MP Area 1. The nearest documented occurrence (1946) is approximately 24.6 miles away.
Western mastiff bat *Eumops perotis californicus*	—/SSC	Found in semiarid to arid habitats, conifer and deciduous woodlands, coastal scrub, annual and perennial grasslands, palm oases, chaparral, desert scrub, and urban settings. Roosts in cliff faces, high buildings, trees and tunnels	**Low.** Marginal roosting habitat is present in MP Area 1. The nearest documented occurrence (1958) is approximately 11.7 miles away
Western red bat *Lasiurus blossevillii*	—/SSC	Prefers riparian habitats near water; roosts in sycamore, cottonwood, velvet ash, and elder trees	**Low.** Suitable roosting habitat is present in MP Area 1. The nearest documented occurrence is from the USGS *Millerton Lake West, California* 7.5-minute quadrangle; exact location and date not available.
Hoary bat *Lasiurus cinereus*	—/—	Found in deserts, dunes, savannas, grasslands, chaparral, forests, rainforests, scrub habitats. Prefers trees at the edges of openings	**Low.** MP Area 1 offers marginal habitat. The nearest documented occurrence (1915) is approximately 18.1 miles away.
San Joaquin long-tailed weasel *Mustela frenata xanthogenys*	—/—	Occurs in brushlands, open timber, brushy field borders, and grasslands along creeks and lakes	**Low.** MP Area 1 offers marginal habitat. The nearest documented occurrence is from the USGS *Fresno North, California* 7.5-minute quadrangle; exact location and date not available.

Species	Status (Fed/State)	Habitat	Potential to Occur
Yuma myotis *Myotis yumanensis*	—/—	Found in a wide variety of settings, from juniper and riparian woodlands to desert regions near open water. Roosts in caves, attics, buildings, mines, and underneath bridges and other similar structures	**Low.** MP Area 1 offers marginal habitat. The nearest documented occurrence (1999) is approximately 30.6 miles away.
American badger *Taxidea taxus*	—/SSC	Found in open areas, plains, prairies, farmlands, grasslands, edges of woods	**Potential.** MP Area 1 offers suitable habitat. The nearest documented occurrence (1987) is approximately 6.8 miles away.
San Joaquin kit fox (SJKF) *Vulpes macrotis mutica*	FE/ST	Found in grasslands and deserts of San Joaquin Valley and adjacent areas; prefers habitat with minimal vegetation	**Low.** MP Area 1 offers marginal habitat. The nearest documented occurrence (1990s) is approximately 10.2 miles away. Both the United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) have concluded that the species is not present in the project area.

Notes:
CDFW = California Department of Fish and Wildlife
DL = federally delisted
FC = candidate for federal listing
FE = federally listed as endangered
FP = State Fully Protected species
SCE = candidate for State listing as endangered
SE = State-listed as endangered
SSC = State Species of Special Concern
ST = State-listed as threatened
USFWS = United States Fish and Wildlife Service
USGS = United States Geological Survey
WL = State Watch List species

Sources: Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation.
Maners, S., and Smith, E. Vollmar Natural Lands Consulting (Vollmar). Personal communication: written communication to Anna Buising at Redtail Consulting. April 4, 2024.
Barnes, C.L. United States Army Corps of Engineers (USACE), Sacramento District, Regulatory Division. Personal communication: email to Anna Buising at Redtail Consulting. April 26, 2024.
Bailey, C. California Department of Fish and Wildlife (CDFW). Personal communication: conversations with Anna Buising (Redtail Consulting) and Shaelyn Latronica (CDFW). September 26, 2025.

Table 3.4-4: Special-Status Wildlife Species Known from Region but Not Expected to be Present in the MP Area 1

Species	Status (Fed/State)	Habitat	Reason Not Expected
Invertebrates			
American bumble bee *Bombus pensylvanicus*	—/—	Prefers the habitat offered by farmlands and open fields, where it nests below the grass or underground. Reported as present in the State, but almost all documented occurrences are east of the Rocky Mountains.	MP Area 1 is significantly outside the species' typical distribution.
Conservancy fairy shrimp *Branchinecta conservatio*	FE	Found in vernal pools and wetlands; generally restricted to long-ponding clay playa pools.	MP Area 1 offers no suitable habitat for this species, and the nearest documented occurrence is approximately 40 miles away in Merced County.
Midvalley fairy shrimp *Branchinecta mesovallensis*	—/—	Found in vernal pools, vernal swales, and other ephemeral water bodies; sometimes in roadside puddles.	Seasonal wetlands in MP Area 1 may provide habitat for this species, but it was not detected in protocol-level wet season surveys conducted for project planning.
Table Mountain harvestman *Calicina mesaensis*	—/—	Lives under basalt rocks in oak grasslands; has only been documented as occurring at Table Mountain.	MP Area 1 offers no suitable habitat for this species and is outside the species' documented range.
Valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	FT/—	Most likely to be found in healthy riparian systems supporting dense clumps of elderberry (*Sambucus nigra*); isolated elderberry shrubs far from such locations may not host the beetle due to its relatively weak flying ability and poor long-distance dispersal capability.	MP Area 1 does not support riparian habitat or elderberry shrubs and is outside of the known geographic range for this species.

Species	Status (Fed/State)	Habitat	Reason Not Expected
Western ridged mussel *Gonidea angulata*	—/—	More commonly found in streams than in lakes; prefers constant water flow and stable, well-oxygenated substrates in areas of low gradient.	MP Area 1 offers no suitable habitat for this species.
Vernal pool tadpole shrimp *Lepidurus packardi*	FE/—	Found in vernal pools and wetlands.	Seasonal wetlands in MP Area 1 may provide marginal habitat for this species, but it was not detected in protocol-level wet season surveys conducted for project planning. In addition, the project site lies within a large gap in this species' documented range.
Western pearlshell *Margaritifera falcata*	—/—	Found only in perennial cold-water streams and rivers that support salmonoids.	MP Area 1 offers no suitable habitat for this species.
Hurd's Metapogon Robberfly *Metapogon hurdi*	—/—	Found in the State around sand dunes.	MP Area 1 offers no suitable habitat for this species.
Fish			
Sacramento Hitch *Lavinia exilicauda exilicauda*	—/SSC	Most often found in slow warm water, including lakes and quiet stretches of rivers; sometimes found in cool, clear, low-gradient streams, hiding among aquatic vegetation in sandy runs or pools.	MP Area 1 offers no suitable habitat for this species.
Hardhead *Mylopharodon conocephalus*	—/SSC	Typically found in small to large streams at low to mid-elevations; possibly also lakes or reservoirs.	MP Area 1 offers no suitable habitat for this species.
Amphibians and Reptiles			
Foothill yellow-legged frog *Rana boylii*	FE/SE	Found in rocky streams and rivers with rocky substrate and open, sunny banks; in forests, chaparral, and woodlands; in isolated pools, vegetated backwaters, and deep, shaded, spring-fed pools.	MP Area 1 offers no suitable habitat for this species.

Species	Status (Fed/State)	Habitat	Reason Not Expected
California red-legged frog *Rana draytonii*	FT/SSC	Found in ponds in humid forests, woodlands, grasslands, coastal scrub, and along streamsides with plant cover. Most common in lowlands and foothills. Frequently found in woods adjacent to streams. Breeding habitat is in permanent or ephemeral water sources; lakes, ponds, reservoirs, slow streams, marshes, bogs, and swamps. In ephemeral wetland habitats, requires animal burrows or other moist refuges for estivation when the wetlands are dry.	MP Area 1 is outside this species' geographic range.
California glossy snake *Arizona elegans occidentalis*	—/SSC	Inhabits arid scrub, rocky washes, grasslands, and chaparral. Appears to prefer open microhabitats with soil loose enough for easy burrowing. Recent occurrences are generally restricted to the western and southern San Joaquin Valley and Southern California.	Habitat in MP Area 1 is marginal for this species, and although historic occurrences (from the early twentieth century) were recorded in the Fresno area, the closest occurrence from the last 20 years is approximately 50 miles away.
Blunt-nosed leopard lizard *Gambelia sila*	FE/SE, FP	Semiarid grasslands, alkali flats, and washes. Prefers flat areas with open space for running, avoiding densely vegetated areas. Uses large shrubs with dense canopy cover for refuge and thermoregulation. Uses mammal dens and burrows for cover and shelter. The number of available burrows will determine the size of this lizard's population in an area.	MP Area 1 offers no suitable habitat for this species.
Giant garter snake *Thamnophis gigas*	FT/ST	Found primarily in marshes, sloughs, drainage canals, and irrigation ditches, especially around rice fields, and occasionally in slow-moving creeks. Prefers locations with vegetation close to the water for basking.	MP Area 1 offers no suitable habitat for this species.

Species	Status (Fed/State)	Habitat	Reason Not Expected
Birds			
Great blue heron *Ardea herodias* (nesting colony)	—/—	Found in marshes, swamps, shores, tide flats; very adaptable. Forages in calm fresh waters or slow-moving rivers, also in shallow coastal bays. Nests in trees or shrubs near water, sometimes on ground in areas free of predators.	MP Area 1 provides no suitable nesting habitat for this species.
Yellow-billed cuckoo *Coccyzus americanus*	FT/SE	Occurs in woodlands, thickets, orchards, streamside groves. Breeds mostly in dense deciduous stands, including forest edges, tall thickets, dense second growth, overgrown orchards, scrubby oak woods, and often in willow groves around marshes. In the west, mostly found in streamside trees, including cottonwood-willow groves in arid country.	MP Area 1 offers no suitable habitat for this species.
Snowy Egret *Egretta thula* (nesting colony)	—/—	Found in marshes, swamps, ponds, and shores. Widespread in many types of aquatic habitats, including fresh and salt water; in coastal areas, they may seek sheltered bays. Inland, favors extensive marshes and other large wetlands. Sometimes forages in dry fields. Nests in colonies in trees, shrubs, or mangroves, sometimes on or near the ground in marshes.	MP Area 1 provides no suitable nesting habitat for this species.
Double-crested cormorant *Nannopterum auritum*	—/WL	Typically found along coasts, bays, lakes, and rivers; very adaptable, may use almost any aquatic habitat, from rocky northern coasts to mangrove swamps to large reservoirs to small inland ponds. Nests in trees near or over water, on sea cliffs, or on ground on islands.	MP Area 1 offers no suitable habitat for this species.

Species	Status (Fed/State)	Habitat	Reason Not Expected
Black-crowned night heron *Nycticorax nycticorax*	—/—	Found in a wide variety of aquatic habitats, around both fresh and salt water, including marshes, rivers, ponds, mangrove swamps, tidal flats, canals, rice fields. roosts in trees. Roosts in trees; nests in groves of trees, in thickets, or on ground, usually on islands or above water, perhaps to avoid predators.	MP Area 1 offers no suitable habitat for this species.
Osprey *Pandion haliaetus*	—/WL	Found near fresh or salt water where large numbers of fish are present, including rivers, lakes, and coastline. May be most common around major coastal estuaries and salt marshes, but also regularly uses large lakes, reservoirs, and rivers.	MP Area 1 offers no suitable habitat for this species.
Yellow Warbler *Setophaga petechia*	—/SSC	Found in bushes, along swamp edges and streams, and in gardens. In the west, breeding is restricted to streamside thickets. In winter in the tropics, favors semi-open country, woodland edges, towns.	MP Area 1 offers no suitable habitat for this species.
Least Bell's Vireo *Vireo bellii pusillus*	FE/SE	Typically found along streamsides and in willows. Breeds in low dense growth, especially in second-growth scrub or brushy fields, but also locally in chaparral, woodland edges, or scrub oaks. Winters in the tropics in dense low scrub, mostly near water.	MP Area 1 offers no suitable habitat for this species.
Yellow-headed Blackbird *Xanthocephalus xanthocephalus*	BCC/SSC	Occurs in freshwater marshes. Forages in fields, open country. Breeds in freshwater sloughs, along marshy lake borders, and in tall cattails growing in water up to 3 feet to 4 feet deep. Forages around marshes and in open pastures, plowed fields, cattle pens, and feedlots.	MP Area 1 offers no suitable habitat for this species.

Species	Status (Fed/State)	Habitat	Reason Not Expected
Mammals			
Northern California ringtail *Bassariscus astutus raptor*	—/FP	Occurs in various riparian habitats and in brush stands of most forest and shrub habitats, at low to middle elevations.	MP Area 1 offers no suitable habitat for this species.
Fresno kangaroo rat *Dipodomys nitratoides exilis*	FE/SE	May be limited to central portion of San Joaquin Valley; recent documented occurrences have all been in alkali sink communities at elevations of approximately 200 to 300 feet.	MP Area 1 is outside the species' elevational range.
North American porcupine *Erethizon dorsatum*	—/—	Found in conifer, deciduous, and mixed forests; in the west, also uses areas of scrubby vegetation.	MP Area 1 offers no suitable habitat for this species.
Spotted Bat *Euderma maculatum*	—/SSC	Found in arid habitats, ponderosa pine forests, marshlands. Roosts in small cracks in cliffs and stony outcrops.	MP Area 1 offers no suitable habitat for this species.
San Joaquin pocket mouse *Perognathus inornatus*	—/—	Limited to Central and Salinas valleys. Found in dry, open grasslands and scrub areas on fine-textured soils, at elevations of approximately 1,100 to 2,000 feet.	MP Area 1 is outside the species' elevational range.

Notes:
BCC = federal Bird of Conservation Concern
FE = federally listed as endangered
FP = State Fully Protected species
FT = federally listed as threatened
SE = State-listed as endangered
SSC = State Species of Special Concern
ST = State-listed as threatened
WL = State Watch List species
Sources: Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation
Smith, E. Vollmar Natural Lands Consulting (Vollmar). Telephone conversation with Anna Buising at Redtail Consulting. August 21, 2025.

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MP Area 2 and Non-development Area

Detailed information on special-status plant and wildlife occurrences in MP Area 2 and the Non-development Area is not currently available, but the general likelihood of occurrence is considered similar to that for MP Area 1 (see Tables 3.4-3 and 3.4-4, above), with the caveat that MP Area 2 and much of the Non-development Area are more developed and disturbed than MP Area 1. Special-status species may therefore be less likely to occur in these areas than in MP Area 1, although their presence cannot be ruled out without further assessment.

3.4.3 - Regulatory Framework

Federal

Endangered Species Act

The federal Endangered Species Act, passed in 1973, defines an endangered species as any species or subspecies that is in danger of extinction throughout all or a significant portion of its range. A threatened species is defined as any species or subspecies that is likely to become endangered within the foreseeable future throughout all or a significant portion of its range. The Endangered Species Act is administered by the United States Fish and Wildlife Service (USFWS) for terrestrial and freshwater species, and by National Oceanic and Atmospheric Administration (NOAA) Fisheries for marine and anadromous species.[23]

Listed species and those that have been proposed for listing are generally protected from unauthorized "take," defined as harassing, harming, pursuing, hunting, shooting, wounding, killing, trapping, capturing, or collecting wildlife or attempting to engage in such conduct, including deleterious modification of habitat (16 United States Code [USC] § 1532, 50 Code of Federal regulations [CFR] § 17.3). However, USFWS and NOAA Fisheries are empowered to authorize limited take that occurs as a result of otherwise legal project activities, referred to as "incidental take." Such authorization typically includes conditions required of the project proponent to protect affected species to the extent feasible while still allowing the project to proceed.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 USC §§ 703–712, *et seq*.) (MBTA) protects migratory birds, their nests, and their eggs. Pursuit, hunting, take, possession, sale, purchase, shipment, delivery, and export are all generally prohibited, although they may be authorized in certain limited circumstances—for example, for scientific collecting, falconry, education, rehabilitation, and migratory game bird propagation. The MBTA also establishes seasons and bag limits for game species. Knowing violation of MBTA provisions may constitute a felony; both misdemeanor and felony convictions under the MBTA are punishable by imprisonment or fines.

[23] Anadromous refers to species such as salmon that migrate between fresh- and saltwater habitats to complete different portions of their life cycles.

Bald and Golden Eagle Protection Act

The Federal Bald and Golden Eagle Protection Act (16 USC §§ 668 – 668[c]) protects bald eagles and golden eagles, their nests and eggs, and eagle products such as feathers from take, possession, sale, barter, transport, import, and export. Exceptions are allowed for traditional Native American cultural uses and for certain scientific activities. Violations are subject to heavy fines. Penalties increase for repeat offenders, and a second violation is automatically treated as a felony.

Clean Water Act

The Clean Water Act (CWA) (33 USC § 1251, *et seq*.) is the cornerstone federal law protecting the nation's surface waters. Because of the importance of waterways as habitat, CWA also indirectly protects the wildlife that depends on surface water resources.

CWA's basic premise is that there is no inherent right to discharge pollutants to waters under federal jurisdiction.[24] Equally important, existing pollution does not authorize further discharge of pollutants; regardless of the condition of the receiving water, discharges must be treated such that they meet applicable standards. CWA thus protects water quality by regulating discharges into federal jurisdictional waters; discharges are illegal unless specifically authorized by permit, and even where permitted, the allowable volume may be limited and water quality standards must continue to be met. Key sections of the CWA from the perspective of biological and habitat resources include Section 404 (Permits for Dredged or Fill Material Placement), Section 401 (Water Quality Certification), and portions of Section 402 (National Pollutant Discharge Elimination System [NPDES]), discussed in the sections that follow.

Clean Water Act Section 404

Administered by USACE, CWA Section 404 regulates the placement of "dredged and fill materials" into waters of the United States, including bodies of open water such as rivers, streams, lakes, and marine waters, as well as some wetlands. USACE is empowered to issue permits for activities meeting criteria to ensure that degradation of function and value in jurisdictional waters is avoided if possible, and if it cannot be avoided, minimized and suitably compensated for. Because the terms "dredged and fill" are interpreted quite broadly in practice, Section 404 requires USACE permit authorization for a wide range of activities entailing temporary disturbance or permanent impact within federal jurisdiction limits—that is, below the OHWM in fresh water and below the mean higher high tide line in tidal waters.

Clean Water Act Section 401

Under CWA Section 401, projects that require federal authorization and have the potential to result in a "discharge" to federal jurisdictional waters must obtain certification that the discharge would not

[24] United States Environmental Protection Agency (EPA) Office of Wastewater Management. 2012. Water Permitting 101. Website: https://nepis.epa.gov/Exe/ZyNET.exe/P101F3HU.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2000+Thru+2005&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C00thru05%5CTxt%5C00000047%5CP101F3HU.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL. Accessed November 21, 2025.

degrade water quality. All projects that require authorization under CWA Section 404 are automatically required to obtain Section 401 water quality certification. In the State, the authority to issue Section 401 water quality certifications is delegated to the California State Water Resources Control Board (State Water Board), which in turn delegates responsibility to the Regional Water Quality Control Boards (RWQCBs).

Clean Water Act Section 402

CWA Section 402 established the NPDES, which regulates discharges from "point" (discrete or highly localized) sources such as wastewater treatment facilities, industrial facilities, and stormwater outfalls. Runoff from construction sites is also regulated under the NPDES program.

All point-source discharges to federal jurisdictional waters must be authorized under an NPDES permit. Individual permits are issued for a single facility, while General Permits cover multiple facilities or activities of the same type within a defined geographic area. CWA Section 402 is administered by the State Water Board and RWQCBs in the State.

Under this authority, the State Water Board requires construction projects with a disturbance footprint of 1 acre or more, and smaller projects that are part of a larger undertaking disturbing 1 acre or more, to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit). One of the requirements for Construction General Permit coverage is preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) laying out the measures that would be used to control erosion and contain site runoff, and the monitoring that would be implemented to ensure that Best Management Practices (BMPs) are operating effectively.

Since 2009, the State has required that SWPPPs be prepared, amended, and certified by a Qualified SWPPP Developer (QSD), and implemented either by a QSD or a Qualified SWPPP Practitioner (QSP).

State

California Endangered Species Act

Originally enacted in 1970, subsequently repealed, and then replaced with an updated version in 1984, the California Endangered Species Act (CESA) (Fish and Game Code [FGC] §§ 2050–2089) establishes the protection of at-risk species as a statewide priority. It lays out specific protections for native plant, fish, and wildlife species that qualify as "threatened" or "endangered," and defines these terms for purposes of State regulation. Much like the federal Endangered Species Act, CESA prohibits unauthorized take of species that are listed or are candidates for listing as threatened or endangered. CESA directs agencies to consult with CDFW on projects or actions that could affect listed species, directs CDFW to determine whether jeopardy would occur, and allows CDFW to identify "reasonable and prudent alternatives" to the project consistent with conserving the species. CESA allows CDFW to authorize exceptions to the State's prohibition against take of a listed species if the take is incidental to carrying out an otherwise lawful project that has been approved under

CEQA (FGC § 2081). However, take cannot be authorized for species designated as Fully Protected under State law.[25]

Native Plant Protection Act

Enacted in 1977, the Native Plant Protection Act (FGC §§ 1900–1913) established the designation "rare" for plants that may not currently be in danger of extinction but are present in small enough numbers that they could become so and therefore merit protection. Amendments to CESA later replaced the usage of "rare" for at-risk fish and wildlife with "threatened" but did not change the use of "rare" for at-risk plants. As a result, there are now three categories for protected at-risk plants in the State: rare, threatened, and endangered. Plants that have been formally listed as threatened or endangered are protected under CESA; importantly, those that are not CESA-listed but qualify as rare continue to be protected under the Native Plant Protection Act.

Additional Sections of California Fish and Game Code

Besides CESA and the Native Plant Protection Act, other portions of the FGC provide important protection for native species and their habitats, as follows:

- **Protection of Nesting Birds.** FGC § 3503 prohibits taking, possessing, or needlessly destroying the nest or eggs of any bird, with certain limited exceptions.
- **Protection of Birds of Prey.** FGC § 3503.5 renders it illegal to take, possess, or destroy any bird belonging to the order Falconiformes or the order Strigiformes. Nests and eggs of birds in these orders are similarly protected.
- **Take of Migratory Nongame Birds.** FGC § 3513 stipulates that take and possession of species designated by the federal MBTA as "migratory nongame birds" may occur only in a manner consistent with the provisions of the MBTA or rules and regulations adopted under the MBTA.
- **Fully Protected Species.** Take of Fully Protected species cannot be authorized under any circumstances. Fully Protected amphibian and reptile species are identified in FGC § 505, birds in FGC § 3511, and mammals in FGC § 4700.
- **Special Protection for Mountain Lions.** FGC § 4800 designates the mountain lion (*Puma concolor*) as a "specially protected" mammal. Taking, injuring, possessing, transporting, importing, and selling mountain lions and their products are misdemeanor offenses subject to fines and/or imprisonment. An exception to the prohibition on take and injury is made for demonstrable cases of self-defense or defense of others.
- **Lake and Streambed Alteration.** Because of their value to the fish and wildlife that are CDFW's primary charge, FGC §§ 1600–1603 protect aquatic resources. In particular, FGC § 1602 prohibits unauthorized diversion, obstruction, and use of materials from the "bed, channel, or bank" of any river, stream, or lake, as well as deposition of material where it may enter a water body. Authorization of such activities requires formal notification to CDFW and entry into a Lake or Streambed Alteration Agreement, which typically includes conditions to

[25] California Department of Fish and Wildlife (CDFW). 2026. Fully Protected Animals. Website: https://wildlife.ca.gov/Conservation/Fully-Protected. Accessed April 16, 2026.

prevent undesirable effects on the water body itself as well as fish and wildlife in the project area. Under this authority, CDFW's jurisdiction over water bodies is construed as comprising the "bed and banks" of California water courses; it is three-dimensional, extending into the subsurface and to activities above the watercourse itself. Again because of the emphasis protection of value to wildlife, it may also extend to encompass the width of the riparian corridor.

California Native Plant Society Rare Plant Inventory

The California Native Plant Society (CNPS) is a 501(c)(3) non-profit organization with a mission to conserve the State's native plants and their habitats. CNPS maintains a routinely updated inventory of the State's rare and endangered plants and assigns them rankings based on the degree of threat they face. The California Rare Plant Ranks (CRPRs) are as follows:[26]

- **Rank 1A:** plants believed to be extinct, or at least extirpated from California
- **Rank 1B:** plants that are rare throughout their range
- **Rank 2A:** plants that are presumed to be extirpated from California, but are more common elsewhere in their range
- **Rank 2B:** plants that would qualify for Rank 1B based on their status in California, but are more common outside the State
- **Rank 3**: "review list" plants about which more information is needed to assess their status accurately
- **Rank 4:** "watch list" plants of limited distribution, which should be monitored regularly

Plants assigned to CNPS Ranks 1A, 1B, 2A, and 2B are presumed to qualify for listing under CESA; many of those assigned to Rank 3 also qualify.[27]

"Threat rank" codes are appended to the primary CRPR rank to provide more information, as follows:[28]

- 0.1: seriously threatened in California
- 0.2: moderately threatened in California
- 0.3: not very threatened in California

For example, a species assigned CRPR 4.3 has limited distribution but is subject to a low degree of threat; a species assigned CRPR 1B.1 is rare throughout its range and is under significant threat.

[26] California Native Plant Society (CNPS). California Rare Plant Ranks. Website: https://www.cnps.org/ rare-plants/california-rare-plant-ranks. Accessed December 12, 2025.
[27] Ibid.
[28] Ibid.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 (California Water Code Division 7) (Porter-Cologne Act) established the State Water Board as a division of the California Environmental Protection Agency (Cal/EPA) and charged it with developing and adopting statewide policies for water quality protection (California Water Code § 13140). The Porter-Cologne Act also divided the State into nine hydrologic regions, each under the jurisdiction of a RWQCB.

Among each RWQCB's key responsibilities is the development and implementation of water quality control plans (basin plans) for the major surface water bodies and groundwater basins within its region (California Water Code § 13240). This includes formally designating the beneficial uses of the region's principal waters and the water quality objectives (WQOs) needed to protect them. Beneficial uses represent the resources and services provided by an aquatic system—that is, the reasons why the water body is valuable, either ecologically or to society. WQOs, which may be numerical (quantitative) or narrative (descriptive), define the level of water quality needed to ensure that a water body continues to satisfy its designated beneficial uses.

Designated beneficial uses may include biologically important services and functions such as

- wildlife habitat,
- spawning, reproduction, or early development habitat,
- warm or cold freshwater habitat,
- rare threatened or endangered species habitat,
- migration of aquatic organisms, and
- preservation of biological habitats of special significance.

The SOI Expansion Area is under the jurisdiction of the Central Valley RWQCB and is subject to the Water Quality Control Plan for the Tulare Lake Basin.[29]

California Wetlands Protection Policy

In August 1993, then-Governor Pete Wilson signed California Executive Order (EO) W-59-93, establishing a statewide policy for wetlands protection and priorities for the way State agencies implement their responsibilities relative to wetlands regulation. EO W-59-93 includes the objective of "ensur[ing] no overall net loss and long-term gain in the quantity, quality, and permanence of wetlands acreage and values in California in a manner that fosters creativity, stewardship, and respect for private property" (EO W-59-93 § II.1). EO W-59-93 encourages reducing the complexity of administering State and federal wetland conservation programs and "partnerships to make … cooperative planning efforts [a] primary focus of wetlands conservation" (EO W-59-93 § II.3).

All State agencies are charged with conducting their activities in a manner consistent with EO W-59-93 objectives, and the no net loss/long-term net gain policy in particular is explicitly invoked as a

[29] Central Valley Regional Water Quality Control Board (Central Valley RWQCB). 2018. Water Quality Control Plan for the Tulare Lake Basin, Third Edition. Website: https://www.waterboards.ca.gov/rwqcb5/water_issues/basin_plans/tularelakebp_201805.pdf. Accessed November 21, 2025.

guiding principle in the State Water Board's State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State, which governs issuance of CWA Section 401 Water Quality Certification. This means that the RWQCBs cannot authorize project impacts if they determine that the project would result in a net loss of wetland acreage or values.

Local

City of Clovis General Plan

The General Plan[30] includes a number of goals and policies for protection of biological resources. The following goals and policies are relevant to biological resources:

Land Use Element

Policy 6.2 **Smart growth.** The City is committed to the following smart growth goals.

A. Create a range of housing opportunities and choices
B. Create walkable neighborhoods
C. Encourage community and stakeholder collaboration
D. Foster distinctive, attractive communities with a strong sense of place
E. Make development decisions predictable, fair, and cost-effective
F. Mix land uses
G. Preserve open space, farmland, natural beauty, and critical environmental areas
H. Provide a variety of transportation choices
I. Strengthen and direct development toward existing communities
J. Take advantage of compact building design
K. Enhance the economic vitality of the region
L. Support actions that encourage environmental resource management

Open Space and Conservation Element

Goal 2 Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

Policy 2.1 **Stewardship.** Promote responsible planning and management of land and resources among property owners.

Policy 2.2 **New development.** Encourage new development to incorporate on-site natural resources and low impact development techniques;

Policy 2.6 **Biological resources.** Support the protection of biological resources through the conservation of high-quality habitat area.

[30] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Policy 2.7 **Native plants.** Encourage the use of native and climate-appropriate plant species and prohibit the use of plant species known to be invasive.

City of Clovis Municipal Code

Tree Protection Standards

City of Clovis Municipal Code (CMC) Chapter 9.30 (Tree Protection Standards) recognizes the aesthetic and environmental importance of the City's trees. Per CMC 9.30.030, the following are considered protected trees that may not be removed without permit authorization from the City.

- Heritage trees, defined in CMC 9.120 as "[a]ny tree…designated by the Protected Tree Advisory Committee based on the finding that the tree has character, significant age and girth, interest or value as part of the development of and/or exemplification of the agricultural, cultural, economic, educational, social, indigenous or historical heritage of the City and identified on the historic resources inventory"
- Trees that were planted or retained in place as a condition of approval for a development application or building permit
- Multi-trunk trees that have at least one trunk 12 inches or more in diameter or 38 inches or more in circumference, measured 4 feet above grade
- Trees 12 inches or more in diameter or 38 inches or more in circumference, measured 4 feet above grade
- Parkway trees and trees located on public property
- Trees required by or memorialized by site plan review

Replacement trees may be required if a tree removal permit is issued (CMC 9.30.090). In some cases, this would require a replanting plan subject to City review approval (CMC 9.30.090.B). Maintenance of replacement trees is regulated under CMC 9.28.090.

There are exemptions to the permit requirement in certain situations. Trees that pose an immediate threat to persons or property during an emergency, or are determined to constitute an emergency, may be removed without a permit on order of the Planning Director, the Public Utilities Director, or any member of the Police or Fire Department (CMC 9.30.050.A). Trees declared to be public nuisances by the Building Official, the Fire Chief, or the Public Utilities Director may also be removed without a permit (CMC 9.30.050.B), as may trees that undermine or impact the safe operation of public utilities (CMC 9.30.050.C). Exemptions also apply for removal of fruit trees (CMC 9.30.050.D), eucalyptus trees (CMC 9.30.050.E), and—unless they fall into one of the protected tree classes—trees on developed single-family residential properties (CMC 9.30.050.F).

3.4.4 - Thresholds of Significance

Significance Criteria

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to biological resources are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Have a substantial adverse effect, either directly or through habitat modifications, on 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 United States 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, and regulations or by the California Department of Fish and Wildlife or United States 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 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.

Approach to Analysis

Application of Significance Conclusions

Where this section presents an overall impact conclusion at the end of a threshold discussion, that conclusion is stated at the most conservative (worst-case) level supported by the analysis across the biological resources evaluated under that threshold. Individual species-specific analyses and conclusions within the section may be less than the overall conclusion; however, the consolidated conclusion is provided to ensure a clear, conservative disclosure of the maximum potential impact identified for the threshold.

Incremental Analysis

Incremental (project-specific) impacts were analyzed consistent with prevailing practice in biological resources impact assessment and conservation, in consideration of the significance thresholds laid out above and the concerns they address. Within MP Area 1, where detailed information on the nature and footprint of proposed development is available, analysis took this planning into account to enable project-level assessment. Within MP Area 2, which would also be subject to the Master Plan

assuming the proposed project moves forward, analysis assumed development consistent with the zoning laid out in the Master Plan but was necessarily programmatic since no specific projects have been proposed and no details are available at this time. Within the Non-development Area, analysis assumed that there would be no development associated with the proposed project and was again programmatic. Development in MP Area 2 would likely require future project-level analysis prior to entitlement, as would any development in the Non-development Area.

Mitigation measures to avoid, reduce, and/or compensate for impacts is identified for all impacts found to be potentially significant. Mitigation measures were developed consistent with current prevailing practice in biological resources conservation, including resource agency guidance for the proposed project and other recent undertakings in the region.

Cumulative Analysis

The analysis for cumulative impacts is divided into the SOI Expansion and Non-development Area, MP Area 2, and Vista Ranch Development/MP Area 1. The geographic scope of the cumulative biological resources analysis consists of the SOI Expansion Area and a 2-mile surrounding buffer within the east-central San Joaquin Valley, which is sufficient to capture the local landscape context relevant to habitat connectivity and species movement while recognizing that more urbanized areas beyond this distance generally do not provide habitat, refuge, or functional connectivity for local wildlife. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to biological resources. The analysis also considers whether the incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. The analysis also considers the foreseeable development projects listed in Table 3-1 (See Chapter 3, Environmental Impact Analysis) in the City and surrounding area, in addition to the proposed project. If there is no impact associated with respect to a particular CEQA threshold, the proposed project would not contribute to the cumulative condition and discussion of cumulative impacts is not required. Accordingly, the cumulative discussion is limited to the potential impacts as discussed below.

Potential to Create New Significant Cumulative Impacts through Repeated Activities

The majority of the proposed project's impacts on biological and jurisdictional resources would represent contributions to cumulative impacts, which are discussed under the individual thresholds below, rather than new impacts *per se*: for example, impacts on special-status species and their habitats, impacts on sensitive natural communities, and impacts on jurisdictional wetlands/waters. Impacts on wildlife movement corridors and nursery sites, to the extent they occur, would also represent contributions to existing cumulative impacts.

A key remaining question is whether the proposed project has the potential, through repeated activities—beginning during project construction and continuing through project operation/occupancy—to place any additional species at a level of risk that qualifies them for special status. This would represent a new significant cumulative impact on the affected species. However, such an outcome is considered very unlikely. This is partly because the SOI Expansion Area—although it is large in the local context—is still comparatively small in the larger regional framework;

moreover, the quality of habitat offered by the SOI Expansion Area is limited, as discussed above, and abundant habitat of similar or better quality is present in the surrounding area and throughout remaining undeveloped portions of the east-central San Joaquin Valley. Additionally, as the Master Plan Area proceeds towards build-out, its utility to wildlife would decrease, and wildlife remaining on-site would be increasingly limited to species that can adapt to and thrive in a developed or development-adjacent setting; no "attractive nuisance" effect is anticipated. In view of these considerations, the proposed project is not expected to independently create new impacts related to elevation of additional species to special status.

Similarly, development approvals that conflict with local policies or ordinances protecting biological resources, or with the provisions of an adopted HCP, NCCP, or other conservation plan would be one-time occurrences. While they might contribute to an existing cumulative impact should such an impact arise in the future, they would not repeat and thus would have no potential to independently create a new significant impact.

Since the proposed project is not expected to create new significant cumulative impacts through repeated activities, the cumulative analysis sections below focus on contributions to existing significant cumulative impacts.

3.4.5 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures, where appropriate, to avoid and/or mitigate impacts to a less than significant level under CEQA.

Special-Status Species and Other Wildlife

Impact BIO-1:	**The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on 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 United States Fish and Wildlife Service.**

SOI Expansion and Non-development Area[31]

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in

[31] As detailed in the Terminology section of Chapter 3 (Environmental Impact Analysis) and Chapter 2 (Project Description), the "SOI Expansion" is an element of the proposed project that refers solely to a reorganization action that would modify the City's SOI boundary to include the approximately 952-acre SOI Expansion Area. The SOI Expansion, as defined in this EIR, is an administrative boundary adjustment and does not, by itself, include any physical development. The SOI Expansion Area consists of two distinct components: (1) the Non-development Area, where no development or land use change would occur, and (2) the Master Plan Area. The Master Plan Area comprises MP Area 1 (the Vista Ranch Development) and MP Area 2. For this analysis, discussion under the "SOI Expansion and Non-development Area" heading evaluates potential impacts associated with administrative actions involved in the SOI boundary expansion component of the proposed project, as well as the Non-development Area component of the SOI Expansion Area.

the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would not alter baseline conditions with regard to special-status species and their habitat. There would be no impact, and no mitigation is required.

MP Area 2

Like the Non-development Area, no detailed information is currently available regarding the occurrence of special-status plant and wildlife species in MP Area 2. However, based on its general similarity to MP Area 1 in terms of overall habitat conditions, it is presumed that the potential for both special-status plants and special-status wildlife to be present is similar to that documented for MP Area 1 (Tables 3.4-1 through 3.4-4). Like MP Area 1, MP Area 2 is also presumed to offer nesting opportunities for multiple common birds and possibly also for special-status bird species.

In this context, it is anticipated that the development of MP Area 2 would have at least some potential to affect special-status plants and wildlife directly through habitat loss and modification. This would be particularly true where development involves the currently least-disturbed portions of MP Area 2, in particular the roughly triangular “outlier” of MP Area 2 surrounded on all sides by lands within MP Area 1, in the central portion of the SOI Expansion Area. Construction noise and disturbance could also adversely affect nesting birds in MP Area 2.

Impacts on both special-status species (plants and wildlife) and nesting birds have the potential to be significant. To address these concerns, the City would require implementation of Mitigation Measure (MM) BIO-1a and MM BIO-1b.

MM BIO-1a would ensure that the potential for special-status species presence in future development areas is evaluated thoroughly. It would also ensure that future developers obtain any permits necessary for impacts on special-status species (either directly or through habitat loss/modification) and that developers would be responsible for implementing conditions required by the permits. As discussed in more detail below for MP Area 1, permit conditions would include the protective measures and/or habitat compensation deemed appropriate by CDFW and/or USFWS and, where listed or candidate species are involved, would be held to the State and federal “No Jeopardy” standard established under the federal Endangered Species Act and CESA, which prohibits actions that would result in jeopardy to a listed or proposed/candidate species’ survival regionally.

MM BIO-1b requires pre-construction surveys for nesting birds, including both common and special-status species, and further stipulates protection of active nests such that the reproductive cycle can be completed and populations are not decreased by construction activity.

With implementation of MM BIO-1a and MM BIO-1b, impacts of development in MP Area 2 would be avoided, reduced, and, if appropriate, compensated for, consistent with regulatory requirements and current best conservation practices. Residual impacts, if any, are considered less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Special-status Plants

Protocol-level surveys of MP Area 1 for special-status plants were conducted in 2023 with negative results,[32] and no special-status plants have been observed in MP Area 1 to date, despite extensive biological fieldwork over the past several years. However, numerous special-status plants are known from the project region, and some of these have at least some potential to be present within MP Area 1, based on existing site conditions (Table 3.4-1).[33] None of the species are considered likely to be present because of the disturbed conditions and generally low habitat quality within MP Area 1. Those with the highest potential are:

- Ewan's larkspur (*Delphinium hansenii* ssp. *ewanianum*)
- Spiny-sepaled button-celery (*Eryngium spinosepalum*)
- Forked hare-leaf (*Lagophylla dichotoma*)

An additional 20 species are considered very unlikely to be present based on existing site conditions but cannot be entirely ruled out of consideration (Table 3.4-1). Of greatest concern are the State- and/or federally listed species:

- Succulent owl's-clover (*Castilleja campestris* ssp. *succulenta*)
- California jewelflower (*Caulanthus californicus*)
- Boggs Lake hedge-hyssop (*Gratiola heterosepala*)
- San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*)
- Hartweg's golden sunburst (*Pseudobahia bahiifolia*)
- San Joaquin adobe sunburst (*P. peirsonii*)
- Greene's tuctoria (*Tuctoria greenei*)

Additional species that cannot be entirely ruled out have no State or federal listing status but qualify as rare (Table 3.4-1). These include several species assigned to CRPR 1 or 2, reflecting a high conservation priority:

- Brassy bryum (*Bryum chryseum*)
- Hoover's calycadenia (*Calycadenia hooveri*)
- Bristly sedge (*Carex comosa*)
- Dwarf downingia (*Downingia pusilla*)
- Hogwallow starfish (*Hesperevax caulescens*)
- Hoary navarretia (*Navarretia eriocephala*)
- Pincushion navarretia (*N. myersii* ssp. *myersii*)
- Adobe navarretia (*N. nigelliformis* ssp. *nigelliformis*)
- Hairy Orcutt grass (*Orcuttia pilosa*)

[32] Vollmar Natural Lands Consulting (Vollmar). 2023. Rare Plant Survey Report. October.
[33] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

- Wine-colored tufa moss (*Plagiobryoides vinosula*)
- Sanford's arrowhead (*Sagittaria sanfordii*)

As noted above, protocol-level rare plant surveys of MP Area 1 were conducted during the 2023 blooming period. None of the species listed above, and no other special-status plants, were observed. Weather conditions were particularly good in 2023, with ample late rainfall; any plants present should have been detectable during the surveys.[34] It is therefore considered very unlikely that clearing and grading for initial development in MP Area 1 would result in the removal of special-status plant species.

However, plant occurrences can vary from year to year. Thus, there is some possibility that special-status plants that were not detectable in 2023 could occur in subsequent years, although MP Area 1 is in a fairly disturbed condition and does not offer particularly hospitable conditions for special-status plants. Removal of special-status plants could constitute a potentially significant impact under CEQA. To address this, the City would require implementation of MM BIO-1c, which requires avoidance of special-status plants where possible and transplantation or replanting to a suitable off-site location if avoidance is not possible. Relocated populations would be subject to monitoring and corrective action, such as supplemental plantings, to support their survival, so that populations are not substantially decreased. This would reduce impacts, consistent with prevailing practice for botanical resources conservation. Any residual impacts would be less than significant. Therefore, with the implementation of MM BIO-1c, the Vista Ranch Development would have less than significant impacts related to special-status plant species. No additional mitigation is required.

Special-status Wildlife

As shown in Tables 3.4-2 and 3.4-3, several special-status wildlife species are known to be and/or have the potential to be present in MP Area 1. Potential impacts to these species, as well as nesting birds protected under the federal MBTA and the FGC, are discussed below.

The Vista Ranch Development applicant has applied to CDFW for a State Incidental Take Permit (ITP) covering impacts on State-listed and candidate species. The ITP is expected to prescribe Avoidance and Minimization Measures (AMMs) to reduce the potential for direct take of individuals and to require mitigation for habitat loss. Additionally, because the Vista Ranch Development would involve filling of State- and federally jurisdictional wetlands, the Vista Ranch Development would require permit authorization from USACE and other resource agencies (discussed in more detail in Impact BIO-3 below), and the applicant has also begun that permitting process. As part of their permit review, in November 2023, USACE initiated formal consultation with USFWS regarding impacts on federally listed species, which is expected to result in issuance of a federal Biological Opinion (BO) that is expected to include AMMs and/or habitat mitigation required for these species during the development of MP Area 1. These would become part of the applicant's responsibilities under their CWA Section 404 permit from USACE. Execution of CDFW-required AMMs and USFWS-required conditions would be enforced by CDFW and USACE.

[34] Vollmar Natural Lands Consulting (Vollmar). 2023. Rare Plant Survey Report. October.

The Vista Ranch Development applicant has applied for State ITP coverage for three species: CTS, Crotch's bumble bee, and western burrowing owl (BUOW). USACE's consultation with USFWS is expected to focus on vernal pool fairy shrimp (VPFS) and CTS, plus western pond turtle and western spadefoot. USACE's BA reached a "Likely to Adversely Affect" conclusion for all four of these species.[35,36] USACE's consultation may also address Hartweg's golden sunburst, San Joaquin adobe sunburst, monarch butterfly, vernal pool tadpole shrimp, Fresno kangaroo rat, and blunt-nosed leopard lizard, for which the USACE BA reached a "Not Likely to Adversely Affect" conclusion.

California Tiger Salamander

Construction

CTS is known to be present and breeding in multiple wetlands within MP Area 1. It is also presumed to use uplands in MP Area 1 for dispersal and aestivation.[37] Thus, there would be potential for direct injury and mortality of CTS during progressive construction of new development within MP Area 1. Such impacts could rise to a level considered significant under CEQA if they are extensive enough to put local population survival at risk. To address this, the City would require implementation of MM BIO-1d and MM BIO-1e.

MM BIO-1d would ensure that construction personnel are aware of the need to avoid and protect CTS individuals and their responsibilities in doing so. MM BIO-1e provides a detailed framework for protection of the species during construction on-site, including a process for relocation of individuals where this is appropriate; it also requires the applicant to complete the State ITP, Streambed Alteration Agreement, and CWA Section 404 permitting processes and to abide by any resulting permit conditions issued by CDFW, USFWS, and/or USACE. Both mitigation measures would be subject to review by CDFW and USFWS as part of the permitting process and may be adjusted or augmented by the agencies. In reviewing and/or adjusting the mitigation measures proposed, CDFW and USFWS would be held to the "No Jeopardy" standard established under the federal Endangered Species Act and CESA, which prohibits actions that would result in jeopardy to a listed or proposed/candidate species' survival regionally, precisely the standard required to reduce an impact to less than significant under CEQA.

Implementing MM BIO-1d and MM BIO-1e would lessen construction-related risks to CTS, following best conservation practices overseen by CDFW and USFWS. These measures would meet the "No Jeopardy" standard and ensure that impacts are reduced to less than significant levels. Any residual impacts would be considered less than significant. No additional mitigation is required.

Operation

Over the long term, although CTS would be increasingly unlikely to use MP Area 1 as development progresses, there could be some potential for increases in direct injury or mortality in comparison with

[35] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.
[36] Vollmar Natural Lands Consulting (Vollmar). 2024. Supplementary Information Memorandum for Endangered Species Act Consultation, Western Spadefoot, and Northwestern Pond Turtle Memorandum. July.
[37] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

the baseline condition because of development-related factors, such as traffic on new roadways, predation by domestic cats (*Felis catus*) and dogs (*Canis familiaris*), and localized pesticide/herbicide use for landscaping maintenance. Impacts are unlikely to rise to a level considered significant under CEQA, but this is not impossible. Therefore, implementation of MM BIO-1e requires the Vista Ranch Development applicant to complete the State ITP, Streambed Alteration Agreement, and CWA Section 404 permitting processes and to abide by any resulting permit conditions issued by CDFW, USFWS, and/or USACE. If CDFW and/or USFWS determine that the potential for long-term injury or mortality (direct take) of CTS is substantial enough to warrant concern, they would require not only construction-period measures to protect CTS but also additional long-term protective measures enforced through the State ITP/Streambed Alteration Agreement and/or federal consultation process and CWA Section 404 permit, such that take is minimized or avoided and the species is not placed in jeopardy. Thus, with the implementation of MM BIO-1e, long-term impacts related to direct injury and mortality of CTS within MP Area 1 would be avoided or reduced to a less than significant level.[38]

In addition to the potential for direct take of CTS individuals, the Vista Ranch Development would also result in both direct and indirect impacts on CTS habitat, detailed in Table 3.4-5. Impact mechanisms are discussed below the table.

Table 3.4-5: Impacts on California Tiger Salamander Habitat

Habitat Class	Impact Type	Impact Acreage
Itemized Impacts		
Uplands		
Suitable upland	Direct impact	189.683
	Avoided; indirect impact	17.539
Low suitability upland	Direct impact	140.257
	Avoided; indirect impact	1.127
	Total impact on CTS upland habitat:	**348.606**
Breeding (Aquatic)		
Occupied breeding	Direct impact	0.39
	Avoided; indirect impact	0.369
Suitable breeding	Direct impact	0.105
Low suitability breeding	Avoided; indirect impact	1.129

[38] Note that both the State Incidental Take Permit (ITP) process and the federal Biological Opinion (BO) would be driven by take affecting single individuals, whereas CEQA is primarily concerned with effects at the occurrence and population level, which typically result from effects on multiple individuals. Consequently, the threshold at which the California Department of Fish and Wildlife (CDFW) and United States Fish and Wildlife Service (USFWS) would consider effects on California tiger salamander (CTS) as warranting additional protective measures would be lower (more sensitive) than the City's CEQA threshold of significance. As such, permit and BO requirements, enforced for CEQA purposes through mitigation measures identified in this Revised Draft EIR, would be more than adequately protective to render potential impacts less than significant under CEQA.

Habitat Class	Impact Type	Impact Acreage
	Total impact on CTS aquatic habitat:	**1.993**
Subtotals by Habitat Suitability		
Occupied and suitable habitat	Direct impacts	190.547
Occupied and suitable habitat	Avoided; indirect impacts	17.539
Occupied and suitable habitat	**Total impact (direct and indirect)**	**208.086**
Low-suitability habitat	Direct impacts	141.386
Low-suitability habitat	Avoided; indirect impacts	1.127
Low-suitability habitat	**Total impact (direct and indirect)**	**142.513**
Total Impact on CTS Habitat:		**350.599**

Notes:
CTS = California tiger salamander
All values are approximate.
Sources: Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation.

The Vista Ranch Development would result in direct fill of approximately 0.39 acre of documented CTS breeding habitat and approximately 0.105 acre of suitable breeding habitat. The Vista Ranch Development would also directly convert approximately 189.7 acres of presumed-occupied CTS upland habitat, as well as approximately 140.3 acres of low-suitability upland habitat to developed land. These losses of habitat represent both direct and indirect adverse effects on CTS due to habitat loss, which would be incurred progressively as the Vista Ranch Development phases move forward.

CTS depend on the ability to migrate between their breeding pools and the large areas of open grassland where the adults spend most of their lives. Development in the vicinity of breeding pools has the potential to interrupt that migration, reducing the ability of new metamorphs to reach shelter and food and the ability of adults to find their way back to the ponds to breed.

Additionally, conversion of existing grasslands to developed areas may modify breeding pools' watersheds or outlets by increasing the amount of impervious surface and/or redirecting storm runoff. Exotic species may be introduced from landscaping within developed areas and input of native species seed and pollen reduced by the decrease in buffer lands supporting native vegetation. Pools near development may also be subject to disturbance due to increased human visitation.

Several aquatic features suitable for CTS would be avoided by the Vista Ranch Development and protected by buffering open space, but these features would be subject to the potential long-term indirect effects described above due to their proximity to developed areas at project buildout. These include the following:

- Three documented CTS breeding pools (totaling approximately 0.369 acre); and

- The agricultural tailwater pond (approximately 1.129 acres), which offers low-suitability CTS breeding opportunities.

A fourth documented breeding pond located immediately outside MP Area 1 in MP Area 2 would be surrounded on two sides by the Vista Ranch Development but would retain some connectivity to the remaining grasslands until MP Area 2 is developed.

Potential for degradation of CTS habitat due to proximity to development would represent an indirect adverse effect on the species. This impact, similar to habitat loss, would increase progressively as Vista Ranch Development progresses toward full buildout.

Because of the large acreages involved, both loss and potential degradation of CTS habitat are considered significant indirect impacts on CTS. However, as discussed above, MM BIO-1e includes a requirement for the Vista Ranch Development applicant to complete the State ITP, Streambed Alteration Agreement, and CWA Section 404 permitting processes and to abide by any resulting permit conditions issued by CDFW, USFWS, and/or USACE. Based on conversations between the applicant team and the agencies to date, permit conditions are expected to include a requirement that the applicant compensate for loss and degradation of CTS habitat at a ratio such that the indirect impact related to loss of habitat is offset over the long term. CDFW cannot legally authorize activities that would "result in the destruction or adverse modification of habitat essential to the continued existence" of CESA-listed species (FGC § 2053[a]), and, if mitigation is proposed, it must be "roughly proportional in extent" to the impact incurred (FGC § 2052.1). Moreover, in determining the extent of mitigation required, both CDFW and USFWS would be held to the "No Jeopardy" standard established under both the federal Endangered Species Act and CESA, which prohibits actions that would result in jeopardy to a listed or proposed/candidate species' survival regionally. As noted above, this is precisely the standard required to reduce an impact to less than significant under CEQA.

The Vista Ranch Development applicant intends to provide compensation for impacts on CTS habitat by dedicating an extensive tract of conservation lands on a ranch property in the Four Corners area near Madera, about 15 miles northwest of MP Area 1 (hereafter referred to as the Mitigation Site).[39] The proposed Mitigation Site consists almost entirely of undeveloped rangeland; other than fences, the only existing development is a set of corrals in the northwest portion of the Mitigation Site. The few existing roads on the Mitigation Site, currently used for site access and management, are

[39] The term *mitigation* in this context refers to the compensatory habitat mitigation required under the various permits required to implement development in Master Plan (MP) Area 1, not to mitigation proposed under the California Environmental Quality Act (CEQA) (Clean Water Act [CWA] Sections 404 and 401, Streambed Alteration Agreement, and State Incidental Take Permit [ITP]); the mitigation proposed would thus be subject to agency review and approval, governed by both the "no net loss" policy for wetlands and the State and federal "No Jeopardy" standard for listed, candidate, and proposed species, discussed further in the text.

The mitigation proposed under the various permit processes is described in the proposed project's application for the State ITP (Appendix E), which also provides additional detail on the preferred Mitigation Site. As of this writing, the Mitigation Site is understood to be available, and it is assumed this Mitigation Site would be used for compensatory mitigation as required by the various permits. However, the ITP application also lays out the rubric for selection of an alternate mitigation site or sites in the event the preferred Mitigation Site becomes unavailable. Any alternate site(s) would also be subject to the "no net loss" policy and "No Jeopardy" standard as described above for the Mitigation Site.

ungraded and unimproved (dirt surface). Both aquatic and upland habitat at the Mitigation Site is in good condition to the extent that the Mitigation Site had previously been proposed as a mitigation bank offering credits for purchase. Together, the Mitigation Site's aquatic and upland resources provide a functional, interconnected habitat mosaic—and, unlike many vacant Central Valley lands, including the majority of MP Area 1—the Mitigation Site has never been cultivated. Conservation of lands on the Mitigation Site is thus expected to create a substantial preserve offering a mosaic of high-quality vernal pool/vernal swale, stream, and annual grassland habitat that is currently documented as supporting at least 13 special-status species, including breeding CTS.[40,41,42]

The Vista Ranch Development applicant has been in discussion with CDFW, USFWS, USACE, and the RWQCB about the mitigation proposal since late 2023. These conversations would continue as the State ITP and other permitting processes move forward. The final extent and configuration of the preserve lands at the Mitigation Site would be developed with resource agency input and would be subject to review and approval by the agencies. Purchase of the Mitigation Site, establishment of a conservation easement over the Mitigation Site, and assignment of long-term monitoring and maintenance responsibilities to ensure the success of the new preserve would need to be finalized prior to the resource agencies issuing permits to authorize development in MP Area 1; the agencies cannot issue permits until mitigation is a certainty. Consequently, with implementation of MM BIO-1e, ensuring that appropriate compensatory mitigation would be in place through multiple resource agency permit vehicles and subject to the "No Jeopardy" standard (which also ensures reduction of impacts to a level less than significant under CEQA), impacts on CTS habitat are considered less than significant. No further mitigation is required.

Crotch's Bumble Bee

Construction

CDFW's California Natural Diversity Database (CNDDB) contains only two records for Crotch's bumble bee in the MP Area 1 region. The closest CNDDB-documented occurrence of the species is approximately 5 miles away but is decades old, and Crotch's bumble bee has not been re-observed at that location in recent years. The closest CNDDB occurrence within the last 20 years is 37 miles away.[43] However, there is also a "citizen science" report of the species near Millerton Lake, less than 10 miles away, in 2023[44] and other recent reports place the species at the HOG Hills Preserve and the Lower Ranch Preserve east of Madera, 17.5 miles northwest of the SOI Expansion Area and 11 miles north-northwest of the SOI Expansion Area, respectively. [45]

Suitable habitat for Crotch's bumble bee is present in MP Area 1's grasslands, in the depressional wetlands during the dry season, and in portions of the existing farm headquarters, and in late April

[40] Vollmar Natural Lands Consulting (Vollmar). 2021. Madera Terrace Conservation Bank Draft Prospectus. November.
[41] Redtail Consulting. 2023. Conceptual Mitigation Plan. October.
[42] Redtail Consulting. 2025. Application for Incidental Take Authorization. March.
[43] Vollmar Natural Lands Consulting (Vollmar). 2024. Supplementary Information for Endangered Species Act Consultation, Western Spadefoot and Northwestern Pond Turtle - Prepared for Wilson Premier Homes.
[44] Xerces Society. 2024. California Bumble Bee Atlas. Website: https://www.cabumblebeeatlas.org/. Accessed November 21, 2025.
[45] Bumble Bee Watch. 2026. Welcome to Bumble Bee Watch. Website: https://www.bumblebeewatch.org/. Accessed November 1, 2025.

2024, species-specific surveys in MP Area 1 found two individuals on-site.[46,47,48] Thus, there is some potential for development in MP Area 1 to affect both Crotch's bumble bee individuals and the species' habitat.

During construction within MP Area 1, direct injury or mortality of Crotch's bumble bee could occur as a result of vegetation clearing or even as a result of individuals being perceived as a nuisance and swatted by construction staff. Because Crotch's bumble bee nests underground and young queens or gynes hibernate underground, there is also some potential that grading for development of MP Area 1 could disturb or destroy nests or kill hibernating gynes. Depending on the extent of injury/mortality to individuals, there may be potential for impacts rising to a level considered significant under CEQA. To address this, the City would require implementation of MM BIO-1d (described above), which requires Worker Environmental Awareness Program (WEAP) training for special-status species issues, and MM BIO-1f, with additional physical protections for Crotch's bumble bee that are based on current CDFW guidance and which would reduce the Vista Ranch Development's impacts to a less than significant level.

MM BIO-1f also includes a requirement that the applicant complete the State ITP and Streambed Alteration Agreement processes and abide by any permit requirements imposed by CDFW. As discussed above, construction cannot occur without the State ITP and Streambed Alteration Agreement in place. As part of those permitting processes, CDFW would evaluate the protections provided under MM BIO-1f, and, if CDFW concludes that additional mitigation and/or adjustments to the mitigation as proposed are needed to ensure the proposed project would not result in jeopardy to the survival of Crotch's bumble bee regionally, the applicant would be required to adhere to those more stringent permit conditions. As noted above, the "No Jeopardy" standard is functionally the same as the standard required to reduce an impact to less than significant under CEQA. Thus, with MM BIO-1d and MM BIO-1f in place, impacts related to direct injury and mortality of Crotch's bumble bee would be reduced to a less than significant level, consistent with current best conservation practices, under the oversight of CDFW and subject to the "No Jeopardy" standard.

Operation

Over the long term, as MP Area 1 is progressively developed, it is expected to become less appealing to Crotch's bumble bee and the species is expected to be less likely to be present. Potential long-term effects related to direct injury and mortality of Crotch's bumble bee and destruction of the species' nests are therefore considered unlikely and, if they do occur, would be less extensive than potential impacts during active construction of each phase. Therefore, significant long-term impacts related to direct injury and mortality of individuals are considered unlikely but cannot be entirely ruled out. However, MM BIO-1f includes a requirement for the Vista Ranch Development applicant to complete the State ITP and Streambed Alteration Agreement permitting processes and to abide by

[46] The 2024 surveys were conducted consistent with Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species.

[47] California Department of Fish and Wildlife (CDFW). 2023. Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species. Website: https://wildlife.ca.gov/Conservation/Survey-Protocols. Accessed December 12, 2025.

[48] Smith, E. Vollmar Natural Lands Consulting (Vollmar). Personal communication: phone call with Anna Buising at Redtail Consulting. April 30, 2024.

any resulting permit conditions issued by CDFW, including those for Crotch's bumble bee. If CDFW concludes that the potential for long-term injury or mortality (direct take) of Crotch's bumble bee is substantial enough to warrant concern, they would be required under the FGC (§ 2053[a]) to impose additional long-term protective measures enforced through the State ITP such that take is minimized or avoided and the species is not placed in jeopardy (see above for further discussion of the State "No Jeopardy" standard as applied to listed and candidate species, and the relationship of the "No Jeopardy" standard to significance under CEQA). Thus, with MM BIO-1f in place, long-term impacts related to direct injury and mortality of Crotch's bumble bee within MP Area 1 would be avoided or reduced to a less than significant level.

Additionally, as a grassland species, Crotch's bumble bee would be subject to indirect effects related to the loss of suitable habitat and "edge effect" pressures on remaining potentially suitable grasslands in and around MP Area 1. Project-related loss and potential additional degradation of habitat would be localized enough that it is considered unlikely to independently jeopardize the survival of Crotch's bumble bee statewide, but it could represent an added pressure on the species to the extent it is present in the project area. It is particularly difficult to assess the importance of this pressure on Crotch's bumble bee because the species is less well understood than many other at-risk taxa and its occurrence/distribution in the project vicinity is uncertain.[49] In light of these uncertainties any increased pressure could represent a concern.

However, the Mitigation Site proposed to compensate for impacts on special-status species includes extensive grasslands of substantially higher quality than those in MP Area 1. Grasslands at the Mitigation Site offer both nesting and foraging opportunities for Crotch's bumble bee, and recent (2025) sightings of the species on lands with similar habitat in the near vicinity indicate that the Mitigation Site offers value for the species.[50] The extent and configuration of the preserve lands at the Mitigation Site are being determined in consultation with CDFW and in consideration of the need to compensate for losses of potential Crotch's bumble bee habitat, and final preserve boundaries would be subject to CDFW approval as a condition of the State ITP, without which the Vista Ranch Development cannot proceed.

MM BIO-1f includes a requirement for the applicant to complete the State ITP and Streambed Alteration Agreement processes (without which construction cannot legally proceed) and to abide by any permit requirements imposed by CDFW. As discussed above for CTS, CDFW cannot legally issue permits for projects that would place CESA-listed species in jeopardy or "result in the destruction or adverse modification of habitat essential to the continued existence" of listed species (FGC § 2053[a]), and, if mitigation is proposed, it must be "roughly proportional in extent" to the impact incurred (FGC § 2052.1). These protections also apply to CESA candidate species, such as Crotch's bumble bee. Compliance with these requirements by both CDFW and the applicant would ensure the long-term preservation of suitable habitat at a compensatory ratio determined adequate to meet the "No Jeopardy" standard, which also ensures reduction of impacts to a level less than

[49] Uncertainties about the species' ecology and distribution are a key reason MM BIO-1f emphasizes not only avoidance of direct injury and mortality but also collection and reporting of data on Crotch bumble bee.

[50] Smith, E. Vollmar, Natural Lands Consulting (Vollmar). Personal communication: phone call with Anna Buising at Redtail Consulting. April 30, 2024.

significant under CEQA. With MM BIO-1f in place to enforce the applicant's responsibilities under the permit process, indirect impacts on Crotch's bumble bee due to loss and degradation of habitat would be appropriately offset and are considered less than significant.

Western Burrowing Owl

Construction

BUOW has not been observed in MP Area 1 to date despite extensive field surveys conducted over the last several years. However, MP Area 1 is within the species' range and offers both suitable nesting burrows and foraging opportunities,[51,52] and the species has been documented in the general project vicinity as follows:

- The closest and most recent CNDDB record for BUOW is approximately 7.5 miles northwest of MP Area 1's northwest corner. This observation, along with another record approximately 8.0 miles north of MP Area 1, was recorded in May of 2003.
- An additional CNDDB record is located approximately 6.3 miles south-southwest of the southwest MP Area 1 boundary. This point is somewhat ambiguous; it indicates that "three breeding pairs were known to have been present sometime during 1981–1990" but was updated in 2016 and does not indicate whether BUOW were still present as of that date. It may thus be less relevant.
- The most recent records of BUOW, and those closest to MP Area 1, come from citizen science. The Cornell Lab of Ornithology's eBird database[53] indicates that numerous individuals have been observed approximately 0.5 mile to the east along De Wolf Avenue (east of the Big Dry Creek Dam). BUOW observations along this stretch of De Wolf Avenue have been recorded almost every year between 2015 and 2025 by a total of 12 unique observers. The most recent observation was on February 10, 2025.

Consequently, although BUOW is not documented as using MP Area 1 at this time, there may be some potential for the species to be present in the future, particularly given the Vista Ranch Development's extended buildout horizon (approximately 10 years anticipated). Thus, there may be some potential for injury, mortality, and/or nest failure as a result of construction activities. At worst, there is some potential that impacts could rise to a level considered significant under CEQA. To address this, the City would require implementation of MM BIO-1d, which requires WEAP training for special-status species issues, and MM BIO-1g, with additional protections for BUOW, reflecting current CDFW guidance.

Like the species-specific measures discussed above for CTS and Crotch's bumble bee, MM BIO-1g includes a requirement for the applicant to complete the State ITP and Streambed Alteration Agreement processes (without which construction cannot legally proceed) and to abide by any permit

[51] ECORP Consulting, Inc. (ECORP). 2023. Biological Resources Assessment for the Triangle Property Project - Prepared for Wilson Premier Homes. January.
[52] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.
[53] Cornell Lab of Ornithology. eBird. Website: https://ebird.org/home. Accessed March 26, 2026.

requirements imposed by CDFW, including those for BUOW. As discussed for CTS, CDFW cannot legally issue permits for projects that would place CESA-listed species in jeopardy; this protection also applies to CESA candidate species such as BUOW. As a result, with MM BIO-1g in place, construction-period impacts related to direct injury/mortality and nest failure affecting BUOW would be reduced to less than significant, consistent with current best conservation practices, under the oversight of CDFW, and subject to the "No Jeopardy" standard, which also ensures reduction of impacts to a level less than significant under CEQA. Any residual impacts would be considered less than significant. No additional mitigation is required.

Operation

Over the longer term, as MP Area 1 is progressively developed and offers less and less open land for both foraging and nesting, the potential for BUOW to be present is expected to decrease somewhat, although even at full buildout, some—fairly limited—opportunities for the species would continue to be available in preserved lands on-site. Preserved lands on-site are not expected to be particularly attractive to BUOW since better opportunities would be easily accessible on remaining open lands to the north and east, including the area behind the Big Dry Creek Dam. Nonetheless, because BUOW are well-documented in urban areas with a moderate level of disturbance,[54] the potential for their occurrence on-site cannot be ruled out. Any BUOW in MP Area 1 would be subject to some risk of "urban take," such as traffic mortality and disturbance-related nest failure, but because the species is not currently known to use MP Area 1, the potential for long-term direct take is considered fairly low.[55]

Additionally, as identified above, MM BIO-1g includes a requirement for the Vista Ranch Development applicant to complete the State ITP process and to abide by any resulting permit conditions issued by CDFW, including those for BUOW. If CDFW concludes that the potential for long-term injury or mortality (direct take) of BUOW is substantial enough to warrant concern, they would require additional long-term protective measures enforced through the State ITP such that take is minimized or avoided and the species is not placed in jeopardy (see above for discussion of State "No Jeopardy" standard as applied to listed and candidate species, and the relationship of the "No Jeopardy" standard to significance under CEQA, and note that construction cannot proceed without the State ITP in place). Thus, with MM BIO-1g incorporated, long-term impacts related to direct injury and mortality of BUOW within MP Area 1 would be avoided or reduced to a less than significant level.

Buildout of MP Area 1 would result in direct loss of approximately 189.683 acres of grassland and another 140.257 acres of former agricultural land that currently offer foraging and nesting opportunities for BUOW. An additional approximately 17.539 acres of grassland habitat and 1.127 acres of former agricultural lands potentially suitable for BUOW would be subject to indirect effects related to proximity to the new development.[56] These include the following:

- disconnection from remaining potentially suitable habitat in the project vicinity;

[54] Baladrón, A.V., Cavalli, M., Isacch, J P., and Bó, M.S. 2020. Burrowing Owl Nest Distribution and Density in Relation to Urban Development. Ethology Ecology & Evolution 32:3:237 – 250.
[55] Redtail Consulting. 2025. Application for Incidental Take Authorization for California Tiger Salamander, San Joaquin Kit Fox, Crotch's Bumble Bee, and Western Burrowing Owl - Prepared for Wilson Premier Homes. March.
[56] Ibid.

- increased human presence and disturbance due to human activity, habitat incursions, noise, night-time lighting, etc.;
- potential for habitat degradation due to increased trash and pollutant input from neighboring development; and
- added vehicular traffic.

Effects on BUOW habitat would be incurred progressively as the Vista Ranch Development phases move forward.[57]

Both direct and indirect impacts on BUOW habitat have the potential to represent a significant adverse effect on the species, although this is somewhat qualified in that the species is currently not known to be present on-site and has not been reported closer than approximately 0.5 mile from MP Area 1 in recent years.[58] However, the Vista Ranch Development applicant proposes to dedicate a substantial conservation preserve in the Four Corners area east of Madera as compensation for losses of special-status species habitat due to the Vista Ranch Development. BUOW is known to be present on the proposed Mitigation Site; the Mitigation Site offers both foraging and breeding opportunities on its extensive grasslands, which are of substantially higher quality than those in MP Area 1.[59,60] As noted above, discussions with CDFW, USFWS, USACE, and the RWQCB are ongoing regarding the details of the proposed preserve, and final preserve boundaries at the Mitigation Site are being developed with agency input and subject to agency review and approval. The applicant's commitment to providing this compensatory mitigation would be enforced through MM BIO-1g.

As noted above, construction cannot proceed without the requisite permits in place, and CDFW cannot legally issue permits for projects that would place CESA-listed species in jeopardy or "result in the destruction or adverse modification of habitat essential to the continued existence" of listed species (FGC § 2053(a)); where mitigation is proposed, it must be "roughly proportional in extent" to the impact incurred (FGC § 2052.1). These protections also apply to CESA candidate species, including BUOW. Compliance with these requirements by both CDFW and the applicant would ensure the long-term preservation of suitable habitat at a compensatory ratio determined adequate to meet the "No Jeopardy" standard. With MM BIO-1g in place to enforce this commitment via the resource agency permitting process, long-term effects on BUOW due to loss of habitat within MP Area 1 would be substantively addressed (i.e., addressed in a manner satisfying the State "No Jeopardy" standard, which also ensures reduction of impacts to a level less than significant under CEQA) and are considered less than significant.

[57] Redtail Consulting. 2025. Application for Incidental Take Authorization for California Tiger Salamander, San Joaquin Kit Fox, Crotch's Bumble Bee, and Western Burrowing Owl - Prepared for Wilson Premier Homes. March.
[58] Ibid.
[59] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Consultation. October.
[60] Redtail Consulting. 2025. Application for Incidental Take Authorization for California Tiger Salamander, San Joaquin Kit Fox, Crotch's Bumble Bee, and Western Burrowing Owl - Prepared for Wilson Premier Homes. March.

Western Pond Turtle

MP Area 1 offers low-quality aquatic habitat and suitable upland habitat for western pond turtle, and the closest documented occurrence (from 2016) is only approximately 0.8 mile away, within a reasonable dispersal distance for this highly mobile species.[61,62] The species is thus considered to have potential to occur and, as identified above, is included in USACE's consultation request to USFWS.

However, western pond turtle has not been observed in MP Area 1, despite extensive field surveys conducted over the past 3 years, many of which concentrated on MP Area 1's aquatic features. Moreover, aquatic habitat in MP Area 1 is less than ideal for the species. In particular, the Outlet Channel, as a constructed trapezoidal feature with no riparian corridor, lacks haul-out and basking opportunities such as in-channel bars, beaches, and instream woody material. The stockponds provide only low-quality habitat due to their small size, limited depth and inundation period, and lack of basking habitat and cover. The most appealing feature in MP Area 1 is the agricultural tailwater pond, but its utility for western pond turtle is substantially reduced by its irregular hydroperiod, which is controlled by releases from the dam in combination with overland runoff. Habitat of better quality is available off-site within the Big Dry Creek Reservoir, upstream reaches of Big Dry Creek, and possibly also in wetted reaches of Big Dry Creek downstream of the confluence with the Outlet Channel. The species is therefore considered unlikely to use MP Area 1 to any great extent and, if present, would likely be a casual visitor rather than a resident.

In this context, there may be some, probably fairly low, potential for disturbance, injury, or mortality of individuals during construction, destruction of nests during construction, and possibly also some potential for long-term increases in injury or mortality due to elevated traffic levels and predation by household pets once the new development is occupied. Although significant impacts related to injury/mortality and nest destruction are not considered likely over either the short or long term, they are not impossible.

Additionally, up to approximately 0.39 acre of low-quality stockpond habitat and approximately 329.94 acres of upland habitat for the species would be subject to direct loss to accommodate construction. Potential habitat in the agricultural tailwater pond (approximately 1.129 acres) and Outlet Channel (approximately 1.4 acres) could be subject to long-term degradation due to proximity to development. These are also considered unlikely to represent significant impacts since the species is not thought to use MP Area 1, but significant impacts related to habitat loss and degradation are not impossible.

To address all of these issues, the City would require implementation of MMs BIO-1d and BIO-1h. With these measures in place, impacts, if any, on western pond turtle would be reduced to a less than significant level.

[61] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

[62] Vollmar Natural Lands Consulting (Vollmar). 2024. Supplementary Information for Endangered Species Act Consultation, Western Spadefoot and Northwestern Pond Turtle, Vista Ranch Project - Prepared for Wilson Premier Homes.

Western Spadefoot

Western spadefoot has been documented within MP Area 1 and is known to breed in a number of the wetlands proposed for fill/removal to accommodate development, according to the BA. Grasslands in MP Area 1 provide suitable upland habitat for adult individuals. Thus, construction in MP Area 1 has the potential to result in direct injury or mortality of individuals during construction. It would also result in direct loss of western spadefoot habitat due to wetland fill and potentially also in long-term indirect impacts on the species due to degradation of remaining habitat in wetlands that are avoided and protected in place (see Table), similar to the situation described above for CTS. All of these impacts (direct injury and mortality, direct habitat loss, long-term degradation of remaining habitat) have the potential to rise to a level considered significant under CEQA.

Table 3.4-6: Impacts on Western Spadefoot Habitat

Habitat Class	Impact Type	Impact Acreage
Itemized Impacts		
Uplands		
Suitable upland	Direct impact	189.683
	Avoided; indirect impact	17.539
Low suitability upland	Direct impact	140.257
	Avoided; indirect impact	1.127
Total impact on western spadefoot upland habitat:		**348.606**
Breeding (Aquatic)		
Occupied breeding	Direct impact	0
	Avoided; indirect impact	0.632
Suitable breeding	Direct impact	0.495
Low suitability breeding	Avoided; indirect impact	1.129
Total impact on western spadefoot aquatic habitat:		**2.256**
Subtotals by Habitat Suitability		
Occupied and suitable habitat	Direct impacts	190.178
Occupied and suitable habitat	Avoided; indirect impacts	18.171
Occupied and suitable habitat	Total impact (direct and indirect)	208.349
Low-suitability habitat	Direct impacts	140.257
Low-suitability habitat	Avoided; indirect impacts	2.254
Low-suitability habitat	Total impact (direct and indirect)	142.513
Total impact on western spadefoot habitat:		**350.862**

Habitat Class	Impact Type	Impact Acreage
Notes: All values are approximate. Sources: Vollmar Natural Lands Consulting. 2025. Vista Ranch Project–Biological Assessment for Endangered Species Act Section 7 Consultation–Prepared for Wilson Premier Homes. October. Vollmar Natural Lands Consulting. 2024. Supplementary Information for Endangered Species Act Consultation, Western Spadefoot and Northwestern Pond Turtle, Vista Ranch Project–Prepared for Wilson Premier Homes.		

However, as discussed for CTS and other species above, the Vista Ranch Development applicant proposes to dedicate a substantial conservation preserve to offset impacts on listed species and their habitat. The proposed preserve lands at the Mitigation Site offer both aquatic and upland habitat for western spadefoot, and the species is known to be present and breeding there.[63] As currently proposed, the preserve would provide mitigation for losses of suitable western spadefoot upland habitat at a ratio of 3:1 and low-suitability upland habitat at a ratio of 2:1; these are the same ratios proposed for CTS. Studies of aquatic habitat at the Mitigation Site are continuing in parallel with agency dialogue, but based on information currently available, the proposed preserve is expected to provide compensation for losses of western spadefoot aquatic (breeding) habitat at a ratio between 2:1 and 4:1.[64] Dedication of conservation lands would be enforced through the federal and State permitting processes, and, as identified in prior impact discussions, construction cannot proceed without those permits in place.

Discussions with CDFW, USFWS, USACE, and the RWQCB are ongoing regarding the details of the proposed preserve lands at the Mitigation Site, and boundaries would be adjusted if the agencies determine this is warranted to provide adequate compensation for losses of western spadefoot (or other species) habitat. Like all federal agencies, USACE is prohibited from undertaking actions, including permit issuance, that are "likely to jeopardize the continued existence of any endangered . . . or threatened species" (Endangered Species Act § 7(a)(2)) or "any species proposed to be listed" (Endangered Species Act § 7(a)(4)), and USFWS requirements imposed via the Endangered Species Act Section 7 interagency consultation for the Vista Ranch Development's CWA Section 404 permit would take this into account since western spadefoot is proposed for federal listing. With MM BIO-1i in place to enforce the applicant's commitment to providing mitigation via the resource agency permitting process, indirect impacts on western spadefoot due to loss and degradation of habitat within MP Area 1 would be addressed consistent with current conservation practice under resource agency oversight and in a manner consistent with the federal "No Jeopardy" standard (which also ensures reduction of impacts to a level less than significant under CEQA) and are, accordingly, considered less than significant. No additional mitigation for indirect impacts related to habitat loss and degradation is required.

Direct impacts on western spadefoot during construction would be reduced or avoided by implementation of MM BIO-1d (WEAP training), in combination with MM BIO-1i below, which includes protective measures to avoid significant impacts on the species. Like the requirement for

[63] Vollmar Natural Lands Consulting (Vollmar). 2021. Madera Terrace Conservation Bank Draft Prospectus. November.
[64] Smith, E. Vollmar Natural Lands Consulting (Vollmar). Personal communication: phone call with Anna Buising at Redtail Consulting. February 20, 2024.

compensatory habitat mitigation, the measures to protect western spadefoot during construction in MM BIO-1i would be subject to agency review during the permitting process. If USFWS determines that these measures are inadequate, the agency would require additional conditions sufficient to achieve the federal "No Jeopardy" standard, which also ensures reduction of impacts to a level considered less than significant under CEQA. Accordingly, with MM BIO-1d and MM BIO-1i incorporated, direct construction-period impacts related to injury and mortality of western spadefoot individuals would be less than significant.

Vernal Pool Fairy Shrimp

VPFS is known to be present in at least some of the wetlands in MP Area 1.[65]

Construction disturbance would have the potential to result in short-term degradation of VPFS habitat in wetlands planned for avoidance, but this would be effectively avoided by the erosion and sediment control measures in the SWPPPs that would be required for construction within MP Area 1, discussed in more detail under Impact BIO-3 below. Indirect construction-period impacts on VPFS habitat "to remain" are therefore expected to be less than significant and are not discussed further. No mitigation is required for these impacts.

However, buildout of the Vista Ranch Development would require unavoidable fill/removal of wetlands, including wetlands known to support VPFS. Impacts on VPFS individuals and/or cysts during construction are therefore possible. The Vista Ranch Development would also result in direct losses of VPFS habitat, as summarized in Table 3.4-7 below. Additionally, as development proceeds around them, wetlands avoided and protected in place could be subject to long-term degradation due to proximity to developed uses, also itemized in Table 3.4-7. Both habitat loss and long-term habitat degradation would represent a long-term indirect impact on VPFS.

Table 3.4-7: Impacts on VPFS Habitat

Habitat Class	Impact Type	Impact Acreage
Known occupied, presumed occupied, or suitable	Direct impact	0.061
	Avoided; indirect impact	00.745

Notes:
All values are approximate.
Source: Vollmar Natural Lands Consulting (Vollmar). 2025. Vista Ranch Project–Biological Assessment for Endangered Species Act Section 7 Consultation.

Although the acreages affected are fairly small, as shown in Table 3.4-7, all of these impacts (direct loss of individuals/cysts, direct loss of habitat, and long-term degradation of remaining habitat) have the potential to rise to a level considered significant under CEQA. To address this, the City would require implementation of MM BIO-1j, which includes measures that would reduce the impacts to less than significant. MM BIO-1j also includes a requirement to complete the CWA Section 404 permitting

[65] Vollmar Natural Lands Consulting (Vollmar). 2023. Dry Soil Analysis for the Detection of Federally-Listed Large Branchiopods at the Vista Ranch Development.

process and comply with all permit requirements, including requirements of the USFWS BO issued following Endangered Species Act Section 7 consultation. These requirements would include stipulations for compensatory habitat mitigation, assuming USFWS feels it is warranted, which they are expected to do in order to meet the "No Jeopardy" standard.

As discussed above, the Vista Ranch Development applicant proposes to dedicate a substantial tract of undeveloped land located in the Four Corners area east of Madera as compensation for losses of special-status species habitat. The proposed Mitigation Site lands are within USFWS-designated Critical Habitat for VPFS, and the species is known to be present on the Mitigation Site.[66] As currently proposed, the preserve at the Mitigation Site would provide mitigation for losses of VPFS habitat at an approximately 73:1 ratio, which includes known occupied habitat. As noted above, discussions with CDFW, USFWS, USACE, and the RWQCB are ongoing regarding the details of the proposed preserve; the preserve boundaries are being finalized with agency input to maximize benefit to species and will be subject to agency review and approval. In the case of USFWS, approval would be required to meet the federal "No Jeopardy" standard, since federal agencies cannot legally authorize actions—including permit issuance—that are considered likely to result in jeopardy to a federally listed species.[67] With MM BIO-1j in place to enforce the applicant's commitment to providing compensatory habitat mitigation via the federal permitting process, long-term effects on VPFS due to loss and degradation of habitat within MP Area 1 would be addressed consistent with current conservation practices under the oversight of the resource agencies and in a manner that satisfies the federal "No Jeopardy" standard, which would ensure reduction of impacts to a level less than significant under CEQA, and are accordingly considered less than significant.

Potential loss of VPFS individuals and cysts during active construction would also be addressed by the extensive conservation set-aside of known occupied habitat and any other conditions required by the resource agencies under MM BIO-1j, which, as noted above, must satisfy the federal "No Jeopardy" standard. With these requirements in place, the Vista Ranch Development is not expected to jeopardize the long-term success of the species in the project region. Impacts related to loss of individual VPFS/VPFS cysts are therefore also considered less than significant with MM BIO-1j incorporated.

California Linderiella

As identified in Table 3.4-2, California linderiella is known to be present in wetlands within MP Area 1 and was identified on-site during protocol-level dry season surveys in 2023, as described in Vollmar's BA. Because the species' habitat requirements are very similar to those of VPFS, the potential for impacts on California linderiella is essentially the same as that described above for VPFS: potential for indirect impacts on habitat "to remain" and potential for direct loss of individuals/cysts during active construction, along with direct loss of habitat and long-term degradation of remaining habitat. Indirect impacts on habitat "to remain" are expected to be less than significant, with no mitigation required, for the same reasons detailed above for VPFS. The other three impacts have the potential to rise to a

[66] Vollmar Natural Lands Consulting (Vollmar). 2021. Madera Terrace Conservation Bank Draft Prospectus. November.
[67] Endangered Species Act of 1973 § 7(a)(2), 16 U.S.C. § 1536(a)(2).

level considered significant under CEQA, again in parallel with VPFS. However, because of the similarity between the two species' habitat requirements, MM BIO-1j, proposed to address impacts on VPFS described above, would also address impacts on California linderiella.

California linderiella is not State- or federally listed and thus is not directly protected by the "No Jeopardy" standard that applies to VPFS as a federally listed species, but because its needs are so similar to those of VPFS, it would be indirectly protected by USFWS's adherence to the "No Jeopardy" standard in reviewing the sufficiency of the proposed compensatory mitigation for VPFS (note that, as discussed above, construction cannot proceed without completion of the required permitting processes). Implementation of MM BIO-1j would therefore ensure that the survival of California linderiella is not placed in jeopardy either locally or regionally, and with this mitigation incorporated, impacts to this species, like those on VPFS, would be less than significant.

General Nesting Birds

As identified above, MP Area 1 has the potential to support nesting by a number of bird species, including some that qualify for various forms of special-status and others that are common species protected only under the federal MBTA and/or FGC.

The noise and activity associated with construction for the development of MP Area 1 has the potential to disturb nesting birds, potentially resulting in nest failure. Direct destruction of nests is also possible, as a result of vegetation clearing and grading. Disruption of nesting activity and direct loss of nests, eggs, or young—impacts that impede reproduction and at worst could reduce local population success—have the potential to rise to a level considered significant under CEQA. To address this, the City would require implementation of MM BIO-1d, which requires WEAP training for species protection, and MM BIO-1k, requiring (1) a pre-construction survey for nesting birds of all species and (2) protections to enable any birds nesting on-site to complete their reproductive cycles so populations are maintained. With these measures in place, impacts would be avoided to the extent feasible and in a manner consistent with current prevailing conservation practice and resource agency guidance. Any residual impacts are considered less than significant. No additional mitigation is required.

San Joaquin Kit Fox

Construction

San Joaquin kit fox (SJKF) is not considered to be present in the vicinity of MP Area 1.[68, 69] There are no CNDDB records of SJKF within 10 miles of MP Area 1; the closest recorded sighting (from the 1990s) is from a location approximately 10.2 miles away, and current populations of the species are concentrated in the southern San Joaquin Valley, Carrizo Plain, and east/southeastern Coast

[68] Barnes, C.L. United States Army Corps of Engineers (USACE), Sacramento District, Regulatory Division. Personal communication: email to Anna Buising at Redtail Consulting. April 26, 2024.

[69] Bailey, C. California Department of Fish and Wildlife (CDFW). Personal communication: conversations with Anna Buising (Redtail Consulting) and Shaelyn Latronica (CDFW). September 26, 2025.

Ranges.[70,71] Both USFWS and CDFW have concluded that the species is not currently present in the area; USACE and USFWS removed it from the Endangered Species Act Section 7 consultation for the proposed project in 2024,[72] and CDFW has similarly recommended that it not be included in the proposed project's application for the State ITP.[73] Despite the long buildout horizon anticipated for the Vista Ranch Development, any potential for SJKF to return to the area before construction of all six project phases is completed is unlikely and speculative given the species' current absence from the region, overall development trends in the region, and the fact that progressive development would render MP Area 1 less appealing to the species. In this context, direct injury or mortality of SJKF during construction in MP Area 1 seems extremely unlikely.

Moreover, in the unlikely event that SJKF were to return to the area such that there was potential for take, the Vista Ranch Development applicant would be legally required to seek an amendment to the proposed project's ITP to extend coverage to include SJKF. Such an amendment would be subject to the "No Jeopardy" standard, which would also ensure that impacts on the species would be less than significant under CEQA, as discussed above for other species subject to take permit requirements. Impacts related to direct injury/mortality of SJKF during construction are accordingly considered less than significant, and no mitigation is required.

Operation

Over the long term, progressive buildout of MP Area 1 would render MP Area 1 and its immediate surroundings less and less appealing to SJKF, and increases in injury or mortality by comparison with the baseline condition are therefore considered even more unlikely over the long term than during active construction. Impacts related to long-term injury or mortality of SJKF are accordingly considered less than significant. No mitigation is required.

Over about the next 10 years, construction in MP Area 1 would result in the conversion of approximately 189.683 acres of potentially suitable SJKF habitat in grasslands and another 140.257 acres of potentially suitable habitat in previously cultivated areas to developed uses. An additional approximately 17.539 acres of potentially suitable grassland habitat and 1.127 acre of potentially suitable habitat in previously cultivated areas would be subject to indirect effects related to proximity to the new development. Indirect effects would include

- disconnection from remaining potentially suitable and marginally suitable habitat in the project vicinity;
- increased human presence;

[70] Smith, E. Vollmar Natural Lands Consulting (Vollmar). Personal communication: Telephone conversation with Anna Buising (Redtail Consulting). February 20, 2024.
[71] United States Environmental Protection Agency (EPA), Office of Wastewater Management. 2012. Water Permitting 101. Website: https://www3.epa.gov/npdes/pubs/101pape.pdf. Accessed November 21, 2025.
[72] Barnes, C.L. United States Army Corps of Engineers (USACE), Sacramento District, Regulatory Division. Personal communication: email to Anna Buising at Redtail Consulting. April 26, 2024.
[73] Bailey, C. California Department of Fish and Wildlife (CDFW). Personal communication: conversations with Anna Buising (Redtail Consulting) and Shaelyn Latronica (CDFW). September 26, 2025.

- potential for disturbance due to human activity, habitat incursions, noise, night-time lighting (a key concern for this largely nocturnal species), etc.;
- potential for increased trash and pollutant input due to neighboring development; and
- added vehicular traffic, much of it on new roadways, increasing the potential for death or injury of any SJKF remaining in the area.

Habitat loss and degradation may have some potential to result in indirect adverse effects on SJKF, although the potential is considered very limited in view of the species' likely absence from the project vicinity. These impacts are accordingly also considered less than significant, and no mitigation is required.

Swainson's Hawk, Cooper's Hawk, and White-tailed Kite

Construction

CDFW's December 2023 comment letter on the NOP for the prior Draft EIR identified Swainson's hawk as a species of potential concern for the proposed project as a whole. As Table 3.4-3 explains, MP Area 1 offers potential nesting and foraging habitat for this species although the closest documented occurrence is approximately 16.3 miles away, and Swainson's hawk has not been observed on-site during extensive studies conducted for project planning, including protocol-level nesting surveys conducted in April 2024. Nonetheless, MP Area 1 is within the species' known range, and there is some potential that it could be present. Cooper's hawk has been observed foraging adjacent to MP Area 1, which offers both forage and suitable nesting opportunities; this species is presumed to be present on-site and may nest there. White-tailed kite has been observed foraging on MP Area 1 and may also nest there since suitable opportunities are available.[74,75]

Direct injury/mortality of adult individuals of any of these species during construction is considered extremely unlikely due to the species' mobility and the availability of additional suitable foraging habitat in close proximity to MP Area 1. Thus, impacts related to potential direct injury or mortality are expected to be less than significant with no mitigation required.

There may be some potential for disturbance of nesting Swainson's hawks, Cooper's hawks, and white-tailed kites, which could result in nest abandonment or loss of nests, eggs, or young; any of these outcomes would have the potential to rise to a level considered significant under CEQA. To address this, the City would require implementation of MM BIO-1d to ensure WEAP training and MM BIO-1k, which stipulates pre-construction surveys and protective avoidance buffers for any active Swainson's hawk and other raptor nests, and would reduce any impacts to a less than significant level. In addition, the applicant is required to consult with CDFW and adhere to CDFW direction for follow-up actions if CESA-listed species are determined to be present on-site. As discussed above, any guidance issued by CDFW during consultation for Swainson's hawk would be subject to the "No Jeopardy" standard, which would ensure the reduction of impacts to Swainson's hawk. CDFW guidance for white-tailed kite would be subject to a similar or greater level of stringency since this is a

[74] Buising, A. Principal Project Manager at Redtail Consulting. Personal communication: phone call. January 5, 2026

[75] Cornell Lab of Ornithology. 2025. eBird Hotspot: Lake Los Carneros—Bird List (includes White-tailed Kite). Website: https://ebird.org/hotspot/L4097687/bird-list?hs_sortBy=taxon_order&hs_o=asc. Accessed January 5, 2026.

Fully Protected Species, for which take at any level cannot be authorized except under certain narrowly defined circumstances that do not include routine construction or development operations (FGC § 3511).[76] Similarly, CDFW guidance for Cooper's hawk would be informed by FGC Section 3503.5, which prohibits take of birds of prey and destruction of their nests or eggs. The same standards also inform the survey procedures and nest buffers required under MM BIO-1k. As a result, with MM BIO-1d and MM BIO-1k incorporated, direct impacts on Swainson's hawk, Cooper's hawk, and white-tailed kite nesting during construction would be less than significant.

Operation

Over the longer term, as the Vista Ranch Development approaches buildout, Swainson's hawk, Cooper's hawk, and white-tailed kite are all expected to be less and less likely to use MP Area 1 due to decreasing availability of habitat and increasing human presence. Once buildout is complete, Swainson's hawk and white-tailed kite are not expected to use MP Area 1 itself, although they could be present in the remaining open areas to the north. Thus, from the perspective of direct impacts, buildout of MP Area 1 would, in essence, relocate the current urban/undeveloped space boundary northward but would not materially alter the situation with regard to the potential for Swainson's Hawk and White-tailed kite presence (and thus for impacts on the species): inhospitable developed areas abutting remaining open lands that offer foraging and nesting opportunities. Direct injury and mortality of Swainson's hawk and white-tailed kite during long-term use and occupancy of the Vista Ranch Development is therefore not expected to increase substantially above the current baseline condition. Cooper's hawk may continue to use MP Area 1 to some extent since this species does nest and hunt in suburban areas, but similar to the other two species, overall conditions in the project vicinity would remain much the same as what they are now: less-hospitable suburban development abutting more hospitable open lands. Direct impacts on all three species over the long term are accordingly considered less than significant. No mitigation is required.

As grassland and open fields foragers, Swainson's hawk and white-tailed kite would be subject to long-term indirect impacts related to habitat loss similar to those described above Crotch's bumble bee, BUOW, and SJKF: loss of a substantial extent of suitable foraging habitat, in addition to loss of nesting opportunities. This is considered a potentially significant impact. However, the Mitigation Site proposed to compensate for impacts on special-status species includes extensive grasslands of substantially higher quality than those in MP Area 1, where Swainson's hawk has repeatedly been observed foraging.[77] The Mitigation Site does not offer nesting habitat, but suitable large trees are present in rural/semi-rural development immediately to the west. Similarly, although white-tailed kite

[76] Fish and Game Code (FGC) Section 3511 allows the California Department of Fish and Wildlife (CDFW) to authorize take of Fully Protected birds for "necessary scientific research, including efforts to recover fully protected, threatened, or endangered species." It also allows authorization of "live capture and relocation . . . pursuant to a permit for the protection of livestock." There are no other exceptions; thus, any guidance issued by CDFW relative to white-tailed kite will be required to focus on complete avoidance of take, which is a more stringent standard than No Jeopardy (No Jeopardy allows limited take as long as the species in question is not placed in jeopardy at a regional level). Accordingly, the ITP application for the Vista Ranch Development does not include white-tailed kite, but because of the commitment in Mitigation Measure 3.4-11 below, consultation regarding the final boundaries of the mitigation preserve will include white-tailed kite, enabling CDFW to weigh in on the species' needs.

[77] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

has not been observed at the proposed Mitigation Site, it is known from the vicinity[78] and suitable nesting and foraging habitat is present on the Mitigation Site.

To ensure that the Mitigation Site provides adequate compensation for losses of Swainson's hawk and white-tailed kite habitat, the City would require implementation of MM BIO-1l, which requires that the needs of Swainson's hawk and white-tailed kite be taken into account in developing the boundaries of the Mitigation Site, in accordance with CDFW guidelines and subject to CDFW review and approval. Because Swainson's hawk is a CESA-listed species, CDFW's approval of mitigation as adequate to offset project impacts would be based on the "No Jeopardy" standard, which also ensures reduction of impacts to a level less than significant under CEQA, as discussed above. Offset of white-tailed kite habitat losses would be subject to equal or greater scrutiny since this is a Fully Protected species. With MM BIO-1l in place, impacts related to loss of Swainson's hawk and white-tailed kite habitat would be reduced to a less than significant level; note that because the foraging requirements of the two species are very similar compensation based on Swainson's hawk guidance, the Swainson's hawk compensation should also adequately address the needs of white-tailed kite.

Progressive buildout in MP Area 1 would also result in loss of foraging habitat for Cooper's hawk. However, unlike Swainson's hawk and white-tailed kite, which hunt in open grassland or agricultural areas, Cooper's hawk is an adept woodland forager that readily adjusts to foraging in suburban areas where landscape trees provide habitat for their preferred avian prey.[79] The new development is thus expected to provide good foraging opportunities for this species. Moreover, suitable forage for Cooper's hawk would remain available along Big Dry Creek north of the Big Dry Creek Dam even at full buildout. As a result, impacts related to long-term loss of Cooper's hawk foraging habitat would be less than significant. No mitigation is required.

Tricolored Blackbird

Construction

As identified in Table 3.4-3, MP Area 1 offers suitable foraging habitat for tricolored blackbird but lacks the dense stands of emergent wetland vegetation the species requires for nesting, although nesting opportunities are likely available along Big Dry Creek northeast of the Big Dry Creek Dam. The closest CNDDB-documented occurrence of the species (from 1974) is approximately 3.4 miles away from MP Area 1, but there are multiple citizen science reports of closer occurrences in recent years, including a cluster of sightings along Big Dry Creek approximately 0.5 mile away, between 1999 and 2025.[80] Thus, tricolored blackbird is considered to have some potential to forage in MP Area 1.

However, as with the raptor species discussed above, direct injury/mortality of adult individuals of tricolored blackbird during construction is considered extremely unlikely due to the species' mobility and the availability of additional suitable foraging habitat in close proximity to MP Area 1. Nesting

[78] eBird. 2025. Species Map for White-tailed Kite (Elanus leucurus). Website: https://science.ebird.org/en/status-and-trends/species/whtkit/range-map. Accessed November 21, 2025.
[79] National Audubon Society. 2025. Bird Guide, Hawks and Eagles: Cooper's Hawk. Website: https://www.audubon.org/field-guide/bird/coopers-hawk. Accessed November 21, 2025.
[80] eBird. 2025b. Species Map for Tricolored Blackbird (Agelaius tricolor). Website: https://science.ebird.org/en/status-and-trends/species/tribla/range-map. Accessed November 21, 2025.

failure as a result of construction disturbance is also considered very unlikely since the closest nesting opportunities are approximately 0.2 to 0.5 mile away on the far side of the Big Dry Creek Dam. Overall, direct impacts on tricolored blackbird during construction would be less than significant, with no mitigation required.

Operation

Progressive buildout of the Vista Ranch Development would result in the loss of foraging habitat for tricolored blackbird in an area where the species is known to be present. This represents a potentially significant impact. To address this, the City would require implementation of MM BIO-1m, which requires that the needs of tricolored blackbird be taken into account in configuring the boundaries of the mitigation preserve. The Mitigation Site offers higher quality foraging habitat for tricolored blackbird than what is available in MP Area 1, and although tricolored blackbird has not been observed on the Mitigation Site to date, the species has been reported in the immediate vicinity in recent years.[81] The minimum mitigation ratio proposed in MM BIO-1m is based on the highest ratio required by CDFW for loss of Swainson's hawk grassland/agricultural land foraging habitat[82] since there is no applicable guidance for tricolored blackbird and the foraging needs of the two species are similar despite their differing ecological niches. Because tricolored blackbird is a CESA-listed species, CDFW's approval of mitigation as adequate to offset project impacts would be based on the "No Jeopardy" standard, [83] which also ensures reduction of impacts to a level less than significant under CEQA, as discussed above. With MM BIO-1m in place, long-term indirect impacts on tricolored blackbird as a result of habitat loss in MP Area 1 would be less than significant.

American badger

The American badger is classified as a California Species of Special Concern (SSC). Historically widespread throughout the State except in humid coastal forests, badger populations are now scarce in the Central Valley and occur in peripheral regions, like eastern Monterey, San Benito, and San Luis Obispo counties.

Badgers inhabit grasslands and savannas, requiring a reliable food supply, friable soils, and open, uncultivated land. No documented occurrences exist within 5 miles of MP Area 1. The nearest documented occurrence of this species is approximately 6.8 miles away and was observed in 1987.

MP Area 1 offers suitable habitat for American badger, and although the species has never been observed on the site and no evidence of its presence (dens, scat, etc.) has been observed,[84] there is some potential that it could occur. If the species is present, there would be potential for direct injury and mortality during construction. This is unlikely to rise to a level considered significant under CEQA since badgers are generally wary and mobile, but significant impacts are not impossible. To address

[81] eBird. 2025b. Species Map for Tricolored Blackbird (Agelaius tricolor). Website: https://science.ebird.org/en/status-and-trends/species/tribla/range-map. Accessed November 21, 2025.
[82] California Department of Fish and Game. 1994. Staff Report Regarding Mitigation for Impacts to Swainson's Hawks (Buteo swainsoni) in the Central Valley of California. Website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83992&inline. Accessed November 21, 2025.
[83] Note that this may increase the requirement for compensation above the minimum ratio stipulated in MM BIO-1m.
[84] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

this concern, the City would require implementation of MM BIO-1d, stipulating WEAP training, and MM BIO-1n, which requires preconstruction surveys for American badger and protection of occupied dens, consistent with current CDFW guidance. With these measures in place, impacts on American badger would be avoided or reduced consistent with current best practices and are considered less than significant.

Over the longer term, buildout of MP Area 1 would result in the loss of a substantial extent of habitat suitable for American badger. However, as discussed for other species above, the Vista Ranch Development applicant has committed to providing extensive preserve lands to compensate for habitat losses in MP Area 1. The proposed preserve lands at the Mitigation Site offer higher-quality grasslands than those available in MP Area 1, and American badger has been documented as using the Mitigation Site (Appendix E.3). In view of this commitment (which would be enforced through multiple mitigation measures called out above), the loss of potential American badger habitat in MP Area 1 is expected to be adequately compensated for and is considered less than significant with mitigation incorporated. No additional mitigation is required.

Other Special-status Wildlife

As identified in Table 3.4-3, multiple additional species of special-status wildlife, in addition to those for which the Vista Ranch Development applicant is seeking State ITP and/or federal BO coverage, have some potential to be present in MP Area 1. These include species that are neither State- nor federally listed but qualify for some other form of State special-status, as well as several listed species.

Thus, buildout of MP Area 1 over time would have some potential to result in both direct injury and mortality to individuals of these species during construction, as well as long-term indirect effects related to loss and/or degradation of habitat. At worst, impacts could rise to a level considered significant under CEQA. To address this, the City would require the implementation of MM BIO-1d to ensure that construction staff are aware of the potential for special-status species to be present, how to recognize them in the field, and proper notification and follow-up procedures in the event individuals are observed. The City would also require implementation of MM BIO-1o, which lays out additional special-status species surveys and follow-up actions to protect such species in the event any are confirmed present. If State- and/or federally listed or proposed/candidate species are determined to be present, follow-up measures would require consultation with CDFW and/or USFWS for direction regarding further protective measures, and the agencies' direction would need to satisfy the "No Jeopardy" standard, which also ensures reduction of impacts to a level considered less than significant under CEQA, as discussed above. For non-listed/non-candidate species, follow-up would include consultation with CDFW, and CDFW's guidance would comply with FGC priorities on protection and conservation of the State's wildlife resources as a matter of utmost public interest (FGC § 1600). With MM BIO-1d and MM BIO-1o in place, impacts on the other special-status wildlife species identified as having potential to be present in MP Area 1 would be reduced to less than significant, consistent with current best practices, under resource agency oversight. Any residual impact is considered less than significant. No additional mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

MM BIO-1a Biological Studies and Protective Measures

As part of the development planning process(es) for Master Plan (MP) Area 2, the development applicant(s) shall retain a qualified Biologist(s) to conduct a comprehensive Biological Resources Evaluation (BRE) of the proposed development area(s) and surrounding vicinity. Coverage of the surrounding area shall be determined by the Biologist(s) based on the best available conservation science for the species with potential to be present and shall be inclusive enough to detect all species with the potential to be affected by disturbance (e.g., due to construction activity) as well as habitat degradation and loss.

The BRE(s) shall address, at a minimum, the following:

- Types of habitat present and habitat quality.
- Presence of sensitive natural communities, if any.
- Presence of wildlife migration or movement corridors, if any.
- Presence of wildlife nursery sites, if any.
- Presence, and potential for presence, of special-status plants.
- Presence, and potential for presence, of special-status wildlife, including State- and/or federally listed and candidate species, as well as species that qualify for other forms of special-status under CEQA.
- General information on location, extent, and quality of potentially jurisdictional wetlands and other waters on and near the site.
- Resource agency permits/authorizations that may or will be required to authorize development activities.
- Need for, and topics to be covered in, construction Worker Environmental Awareness Program (WEAP) training for biological resources, sensitive habitats, jurisdictional resources, and special-status species.

If the Biologist determines that there is potential for the presence of special-status plants on the site, the BRE shall require protocol-level surveys for special-status plants, consistent with the California Department of Fish and Wildlife's (CDFW's) Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities or most current equivalent.

If listed, candidate, or proposed wildlife species are shown to be present on the site, or if there is a high probability of their presence, based on habitat conditions and

species ranges, the BRE shall stipulate the need for consultation with CDFW and/or the United States Fish and Wildlife Service (USFWS) (depending on the species present/potentially present). The need for protocol-level surveys for special-status wildlife shall be determined in consultation with the resource agencies.

If potentially jurisdictional wetlands or other waters are identified on the site, the BRE shall require consultation with the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and CDFW.

Additionally, if the Biologist determines that site conditions warrant it, as is supported by the USFWS's Endangered Species Consultation Handbook, the BRE shall recommend follow-up steps, potentially including but not necessarily limited to:

- Further non-protocol studies of habitat, plants, and wildlife at the site.
- Protocol-level surveys for special-status plants, conducted in a manner consistent with CDFW Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities or most current equivalent.
- Protocol-level surveys for special-status wildlife, conducted in a manner consistent with species-specific protocols adopted by the CDFW and/or USFWS, and current at the time of survey.
- Consultation with State and/or federal resource agencies if listed or candidate species are involved.
- Measures to avoid, reduce, and compensate for impacts on biological and jurisdictional resources in general, including sensitive natural communities, wildlife movement/migratory corridors, and wildlife nursery sites, consistent with current best conservation science and practices.
- Measures to avoid, reduce, and compensate for impacts on special-status species and their habitat, consistent with adopted CDFW and/or USFWS agency protocols current at the time of project entitlement.

The applicant(s) shall be responsible for implementing all requirements and follow-up measures identified in the BRE and for obtaining any resource agency permits required to authorize development activities (e.g., State Incidental Take Permit [ITP], aquatic resource permits, etc.). The applicant(s) shall also implement any permit conditions required by the resource agencies. Permit conditions required by the agencies shall be legally binding.

The City shall ensure that the recommended measures to avoid, reduce, and compensate for impacts on biological and jurisdictional resources in general, and on special-status species and their habitat—or equally effective alternate measures based on current conservation science and subject to approval by CDFW and/or USFWS as appropriate—are included as Conditions of Approval (COAs) for the proposed development.

MM BIO-1b Nesting Bird and Active Nest Protection

If vegetation removal or trimming, clearing/grubbing, excavation, or grading for development within Master Plan (MP) Area 2 is to begin during the bird nesting/breeding season (February 1–September 15), the development applicant(s) shall retain a qualified Biologist to conduct a pre-construction survey for nesting birds. The survey shall take place no more than 2 weeks prior to the initiation of work. Surveys shall comply with the following guidance, or the most current equivalent thereof.

- California Department of Fish and Wildlife (CDFW) Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015.
- Swainson's Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley.

If any active nest is found, or nest-building activity is observed, in an area that could be directly affected by project activities, or in a location potentially subject to construction-related disturbance, a no-disturbance buffer zone(s) shall be established for nest protection. Buffers shall remain in place for the remainder of the nesting season or until the Biologist determines that all young have fledged or that the nest has been abandoned. No entry of personnel, equipment, or materials into the no-activity buffer shall be permitted without written authorization from the California Department of Fish and Wildlife (CDFW) (and if federally protected species are involved, the United States Fish and Wildlife Service [USFWS]).

Buffers shall be delineated in the field by or under the supervision of the Biologist, using temporary construction fencing or another suitable low-impact medium. The size of the buffer zone(s) shall be determined by the Biologist based on the species involved, their behavior, the amount of vegetative and other screening between the nest and the locations(s) where potentially disturbing activities would be occurring, and, if appropriate, other site-specific factors. The minimum buffer widths shall be as follows:

- 500 feet for raptors other than Swainson's hawk
- 0.5 mile for Swainson's hawk
- 300 feet for tricolored blackbird
- 50 feet for all other species, unless modified by the Biologist based on site-specific observations, as follows

Buffers shall be enlarged if the Biologist determines this is warranted, based on the following factors or other observations on-site:

- Overall sensitivity of the nesting species
- The behavior and apparent sensitivity of the individual nesting birds

- Baseline noise and disturbance levels at the construction site at the time of the survey and the level of noise and disturbance expected during construction activity

Vista Ranch Development/MP Area 1

MM BIO-1c Rare Plant Survey, Avoidance, and Transplantation

Prior to groundbreaking for any project phase or sub-phase, the Vista Ranch Development applicant shall retain a qualified Biologist/Botanist who is familiar with the rare plants of the project region to conduct an additional round of protocol-level rare plant surveys. Surveys shall be conducted consistent with California Department of Fish and Wildlife (CDFW) Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities or most current equivalent and shall cover the area reasonably expected to be disturbed within the next 2 years. If the area, or portions of the area, are not developed within 2 years of completion of the rare plant survey, then, prior to any future groundbreaking for that area, an additional round of protocol-level rare plant surveys shall be completed in accordance with the requirements of this mitigation measure.

Surveys shall be conducted prior to construction with enough lead time to allow for consultation with the CDFW (and, if appropriate, United States Fish and Wildlife Service [USFWS]) and additional follow-up actions, if they are warranted. Surveys shall be conducted during the peak blooming periods of the target species and shall cover all potentially suitable habitats within Master Plan (MP) Area 1.

If no special-status plants are documented within the area to be disturbed for project construction (including staging and access), no further action is required.

If any listed plant species or any plant species assigned to California Rare Plant Rank (CRPR) 1 or 2 is found to be present, the following measures shall be implemented at a minimum. With prior written approval from CDFW—and, if federally listed species are involved, USFWS—equally protective measures may be substituted. The Vista Ranch Development applicant shall be responsible for implementing all measures.

- The occurrence(s) shall be avoided and protected in place whenever it is possible to do so.
- If the occurrence(s) cannot be entirely avoided, a Plant Salvage and Mitigation Plan shall be prepared and implemented. The Plant Salvage and Mitigation Plan shall be prepared by a qualified Biologist/Botanist who is familiar with the rare plants of the project region and has experience conducting rare plant salvage operations. The plan shall be subject to CDFW (and, if federally listed species are involved, USFWS) approval, and shall, at a minimum, include the following standards.
  - Quantity and species of plants to be planted or transplanted

- Location of the mitigation/transplant site(s), which shall be suitable to the species involved and within the species' known geographic range(s)
- Salvage methods, such as relocation/transplantation, seed collection, etc., including storage locations and methods to preserve the plants
- Procedures for propagating collected seed, including storage methods
- Planting procedures, including any use of soil preparation and irrigation
- Schedule and action plan to maintain and monitor the mitigation/transplant site for a minimum 3-year period following transplantation
- Interim and final success criteria and corrective action thresholds, including growth, plant cover, and minimum survivorship of the transplanted species
- Corrective actions/contingency measures in the event interim success criteria are not being met (e.g., weed removal, supplemental irrigation, supplemental plantings)
- Reporting requirements and procedures, including the contents of annual progress reports, report submittals, review/approval responsibilities

The Plant Salvage and Mitigation Plan shall be implemented under the oversight of the Biologist/Botanist who prepared it or another individual with equivalent qualifications.

MM BIO-1d Worker Environmental Awareness Program Training

The Vista Ranch Development applicant shall require all construction personnel to undergo Worker Environmental Awareness Program (WEAP) training that provides information on the following:

- the sensitive habitats in Master Plan (MP) Area 1
- special-status species known and potentially present in MP Area 1, including their
  - listing status and causes of decline
  - habitat preferences
  - distinguishing physical characteristics
- the measures (Avoidance and Minimization Measures [AMMs], permit conditions, and CEQA mitigation) required to protect sensitive habitats and special-status species, including avoidance of delineated exclusion areas, and next steps and notifications in the event of a special-status species sighting

The training shall include a hard copy handout that summarizes the information presented and includes photographs of habitat resources and species to facilitate identification in the field by construction personnel. A readily available copy of the AMMs, permit conditions, and CEQA mitigation shall be maintained by the construction foreman on the construction site for reference.

The applicant shall ensure that all construction personnel and any new personnel to the site undergo WEAP training prior to commencing ground-disturbing activities in MP Area 1. Training shall be delivered by a qualified Biologist experienced in the

Fresno County/San Joaquin Valley area and shall be provided in English and, if appropriate, Spanish. Upon completion of training, employees shall sign a form stating that they attended the training and understand all of the required CEQA mitigation and permit conditions. Signed forms shall be submitted to the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS).

MM BIO-1e California Tiger Salamander Avoidance and Protection

The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP), Clean Water Act (CWA) Section 404, and Streambed Alteration Agreement permitting processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW) and the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions relative to California tiger salamander (CTS), including Avoidance and Minimization Measures (AMMs) and habitat compensation.

The following measures shall be required. If, via the State permitting processes or the federal interagency consultation process, CDFW and/or the United States Fish and Wildlife Service (USFWS) issue alternate requirements that would be equally or more protective, those shall be substituted.

- The applicant shall develop a CTS Relocation Plan, prepared by a qualified Biologist and subject to approval by CDFW and USFWS. The CTS Relocation Plan shall include specific areas to which the designated qualified Biologist may relocate individual CTS that are at risk from project-related activities. It shall also include provisions for the Biologist to monitor the translocated animal until it is determined that it is not at risk from predators or other factors. CTS shall be relocated to the appropriate habitat for their stage in the life cycle; for example, CTS found in burrows shall be relocated to burrows and not to aquatic habitat.
- If a known or potential CTS individual is encountered during any project-related activity, all the following requirements shall apply.
  - All work that could result in direct injury or disturbance of the individual animal shall cease immediately;
  - The foreman and on-call Biologist shall be notified immediately; and
  - The Biologist shall take appropriate action to secure the individual (relocation per the CTS Relocation Plan and/or veterinary care if appropriate) and shall then notify CDFW, USFWS, and the applicant via telephone or email.
- The applicant shall appoint a representative to act as the contact for the Biologist to receive notifications of CTS encounters. The representative shall be identified during the Worker Environmental Awareness Program (WEAP) training program and their name and contact information shall be provided to CDFW and USFWS.
- An Herbicide Use Plan shall be drawn up prior to the onset of development activities and shall be subject to CDFW and USFWS approval before work on each phase begins. The plan shall allow no more than two applications of herbicide per

year during development activities. Herbicides shall be used only in a manner that avoids primary or secondary poisoning of CTS and the prey populations on which they depend within the phase footprint. All uses of such compounds shall comply with label and other restrictions mandated by the United States Environmental Protection Agency (EPA) and the California Department of Food and Agriculture, and other appropriate State and federal regulations, as well as any other additional project-specific restrictions required by CDFW and/or USFWS.

- Prior to ground disturbance for each phase or sub-phase (defined as major earthwork associated with rough grading, lot leveling, infrastructure construction, and street improvements; not including construction of individual homes on previously graded pads), the disturbance areas shall be subject to the following measures to protect CTS. These measures shall be enforced for the duration of ground-disturbing activities under the oversight of a qualified Biologist. After the completion of initial ground-disturbing activities for each phase or sub-phase, the qualified Biologist shall continue to be available by phone and shall be on-call to visit MP Area 1 as needed throughout phase construction. The Biologist's contact information shall be provided to CDFW and USFWS.
  - First, individual sub-phases or disturbance areas shall be identified within each project phase. Sub-phases shall be defined with the input of a qualified Biologist such that no undisturbed areas of potential CTS habitat are surrounded or cut off from other CTS habitat as a result of ground disturbance and/or implementation of other AMMs, such as wetland exclusion areas. Instead, sub-phases shall be developed such that the most direct route from any given patch of potential CTS habitat on-site to the nearest accessible off-site CTS habitat remains open until the on-site patch has been subject to relocation measures described below. Multiple, or even all, sub-phases may be active concurrently, but no portion of the project or phase site shall be disturbed until after CTS relocation and other AMMs have been undertaken on it.
  - Following the survey and relocation of individuals, an exclusion barrier shall be installed at the limits of grading for the phase or sub-phase to prevent CTS from reentering the disturbance area. The materials and installation methods for the exclusion barrier shall be subject to approval by CDFW and USFWS, and the barrier shall be installed under Biologist oversight. The exclusion barrier shall be inspected weekly and maintained and repaired as necessary to ensure that it is functional and not a hazard to any CTS on the outside of the barrier. The barrier shall remain in place until the completion of major ground-disturbing activities within the phase or sub-phase it encompasses.
  - Once visual surveys, relocation, and exclusion barrier installation have been completed, the disturbance area may be subject to initial ground-disturbing activities (vegetation clearing, grubbing, scraping, grading, trenching, and other activities that would convert potential CTS upland habitat to non-habitat through the disruption of on-site rodent burrows).

  - A qualified Biologist shall be on-site to monitor vegetation clearing, grubbing, and rough grading, until or unless the Biologist determines that monitoring is no longer necessary. The Biologist(s) shall have authority to stop any work that may result in the take of CTS and to ensure adherence to all required AMMs. CDFW, USFWS, and USACE shall be notified of any "stop-work" orders issued by the Biologist(s).
- The following requirements shall apply in areas that have not been "cleared" for CTS and enclosed in an exclusion barrier:
  - A qualified Biologist shall be on-site to monitor all work. The Biologist(s) shall have authority to stop any work that may result in the take of CTS and to ensure adherence to all required AMMs. CDFW, USFWS, and USACE shall be notified of any "stop-work" orders issued by the Biologist(s).
  - Work shall be prohibited when the National Weather Service 72-hour forecast predicts a 70 percent or greater chance of rainfall; work may resume 24 hours following the cessation of rainfall if a 0 percent chance of rain is predicted in the next 72 hours.
  - Because CTS may take refuge in cavity-like and den-like structures, such as pipes, and may enter stored pipes and become trapped, all pipes, culverts, and similar structures that are stored in non-excluded portions of MP Area 1 for one or more overnight periods shall either be securely capped prior to storage or shall be thoroughly inspected by the authorized on-call Biologist and/or the construction foreman/manager for CTS before the pipe is relocated, capped, buried, or otherwise used or moved in any way.
  - To prevent inadvertent entrapment of CTS during development, the on-call Biologist and/or construction foreman/manager shall ensure that all steep-walled excavations and trenches more than 1 foot deep are completely covered at the close of each working day by plywood or similar materials or are provided with one or more escape ramps constructed of earth fill or wooden planks and inspected and approved by the on-call Biologist. Before excavations or trenches are filled, they shall be thoroughly inspected for trapped animals by the on-call Biologist and/or construction foreman/manager.
- The following requirements shall apply to all parts of MP Area 1 (within and outside CTS exclusion barrier).
  - Project-related vehicles shall observe a 15-miles-per-hour (mph) off-road speed limit.
  - Erosion control measures shall employ tightly woven fiber netting or similar material to reduce the potential for CTS entrapment. This limitation shall be communicated to all contractors through the use of Special Provisions included in the bid solicitation package. No plastic monofilament netting (erosion control matting) or similar materials shall be used.
  - No insecticides or rodenticides shall be used in construction or development areas as part of the project development process.

- To reduce the potential that predators of CTS shall be attracted to MP Area 1, all food-related trash items, such as wrappers, cans, bottles, and food scraps, shall be disposed of in solid, tightly closed containers (trash cans) and shall be removed from the construction site regularly.

MM BIO-1f Crotch's Bumble Bee Avoidance and Protection

The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP) and Streambed Alteration Agreement processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW). The applicant shall then be responsible for implementing all permit conditions relative to Crotch's bumble bee, including Avoidance and Minimization Measures (AMMs) and habitat compensation.

The following AMMs shall be required. If, via the State ITP or Streambed Alteration Agreement process, CDFW issues alternate requirements that would be equally or more protective, those shall be substituted.

- No more than 1 year prior to the initiation of vegetation removal and grading in MP Area 1, the applicant shall retain an appropriately qualified Biologist (see next paragraph) to conduct surveys for Crotch's bumble bee.
- Surveys shall be performed by a qualified Entomologist familiar with the species' behavior and life history and shall include both habitat evaluations and foraging bee surveys consistent with the recommendations in CDFW Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species. Surveys shall be conducted during the peak worker activity period for Crotch's bumble bee (April 1 – July 31) and shall cover all areas of on-site habitat determined by the Biologist to be suitable for the species based on habitat mapping conducted for the Vista Ranch Development to date and observations in MP Area 1 at the time of survey. A minimum of three to four surveys shall be conducted, spaced 2 weeks apart; the total number, timing, and duration of surveys performed shall depend on the Biologist's judgment in consideration of weather, site conditions, and current CDFW recommendations/protocols.
- If no Crotch's bumble bee individuals are observed on-site and no sign of the species' presence is detected during the surveys, no further action shall be required.
- If Crotch's bumble bee is observed on-site during the surveys, an additional survey or surveys shall be conducted to determine whether a nest or colony is present, unless the Biologist is satisfied that the initial survey(s) were sufficient to rule out the presence of nests/colonies.
- If a nest or colony is present on-site, the Biologist shall establish an appropriate avoidance buffer determined in consideration of site conditions and the construction activities planned prior to the close of the nesting season. No entry into the buffer shall be permitted. The buffer shall be delineated in the field using

orange construction fencing or another appropriate medium under the Biologist's oversight and shall remain in place until the end of the Crotch's bumble bee gyne flying season (February 21 – August 7), or until the Biologist determines that the nest has been abandoned.

- If no nest/colony is present on-site, no further action needs to be taken.

To support improved understanding and conservation of Crotch's bumble bee, survey results, including negative findings, shall be submitted to CDFW before project-related ground disturbance begins. At a minimum, the survey report shall include the following information:

- A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee;
- Field survey conditions, including name(s) of qualified Entomologist(s) and brief qualifications, date(s) and time(s) of survey, survey duration, general weather conditions, survey goals, and species searched;
- Map(s) showing the location of nests/colonies, if any;
- A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found, including native plant composition within impacted habitat (species list separated by vegetation class; density, cover, and abundance of each species);
- The AMMs that shall be implemented to avoid adverse effects on Crotch's bumble bee;
- An assessment of potential effects on special-status bumble bees during project construction and project operation/maintenance with AMMs in place.

Additionally, all workers shall be required to avoid injury and mortality to Crotch's bumble bees they may encounter; this requirement shall be discussed during the Worker Environmental Awareness Program (WEAP) Training required for all construction personnel (Mitigation Measure [MM] BIO-1d) and shall be reiterated to all workers if special-status Crotch's bumble bees are confirmed on-site.

MM BIO-1g Western Burrowing Owl Avoidance and Protection

The Vista Ranch Development applicant shall complete the State Incidental Take Permit (ITP) and Streambed Alteration Agreement processes and shall obtain the necessary permits from the California Department of Fish and Wildlife (CDFW). The applicant shall then be responsible for implementing all permit conditions relative to western burrowing owl (BUOW), including Avoidance and Minimization Measures (AMMs) and habitat compensation.

The following measures shall be required. If, via the State ITP process, CDFW issues alternate requirements that would be equally or more protective, those shall be substituted.

- The applicant shall develop a BUOW Exclusion and Relocation Plan prepared by a qualified Biologist and subject to approval by CDFW. The BUOW Exclusion and Relocation Plan shall provide for the installation of BUOW exclusion measures in the event occupied burrows are observed during surveys (see below), as well as artificial burrows to replace occupied and suitable burrows affected by construction ground disturbance. Measures stipulated in the BUOW Exclusion and Relocation Plan shall be consistent with CDFW's most current recommendations
- Prior to contractor mobilization on-site, a qualified Biologist shall survey Master Plan (MP) Area 1 for BUOW. Surveys shall be conducted per the following methodology.
  - A minimum of two pre-construction surveys shall be conducted, unless the first survey detects BUOW, in which case a second survey is not needed. Surveys shall conclude no more than 2 calendar days prior to construction. Surveys shall therefore begin no more than 4 days prior to the date planned for contractor mobilization on-site to allow for 2 days of surveying plus up to 2 days between surveys and mobilization. To avoid the potential for last-minute changes in the construction schedule, a preliminary survey may be conducted up to 15 days before mobilization. The preliminary survey shall be counted as the first of the two required surveys, as long as the second survey concludes no more than 2 calendar days in advance of construction.
  - To maximize the likelihood of detecting BUOW, each survey shall last a minimum of 3 hours.
  - Surveys shall cover all areas of suitable habitat within the footprint of the phase or sub-phase where construction is being initiated, plus a 600-foot-wide buffer. Surveys shall entail walking straight-line transects spaced approximately 7 to 20 meters (approximately 23 to 65 feet) apart, adjusting for vegetation height and density based on the judgment of the surveying Biologist. At the start and termination of each survey and at least every 100 meters (approximately 325 feet) along the transect, binoculars shall be used to scan the entirety of the visible phase area and buffer for BUOW. Survey transects shall extend to the boundary of the property to which the applicant has legal access; where the buffer encompasses property owned/controlled by others, the survey shall be visual-only, using binoculars.
  - Surveys shall be timed for optimal weather conditions for BUOW detection: ambient temperature >20ºC (degrees Celsius) (>68ºF [degrees Fahrenheit]), winds <12 kilometers per hour (km/h) (7.5 miles per hour [mph]), and cloud cover <75 percent. Surveys shall not be conducted if wind speeds exceed 20 km/h (~12 mph) and there is precipitation or dense fog.
  - Surveys shall be conducted during the time windows when BUOW detection probabilities are highest: between morning civil twilight and approximately 10:00 a.m., and between 2 hours before sunset and evening civil twilight.
  - During the surveys, all burrows known to be or potentially in use by BUOW shall be recorded and their locations captured using sub-meter-precision Global

Positioning System (GPS). Potentially used burrows shall be determined based on the presence of one or more of the following: BUOW individuals, pellets, prey remains, whitewash, and/or decoration. Survey personnel shall also listen for BUOW calls while conducting the surveys.
  - Care shall be taken to minimize disturbance near known or potentially occupied burrows to avoid flushing BUOW.
  - If raptors or other predators that may suppress BUOW activity are present, the Biologist shall return for a follow-up survey.
  - Any BUOW observed shall be counted, and their location(s) shall be mapped.
  - BUOW observed shall be checked for bands; bands/band combinations shall be reported to the United States Geological Survey's (USGS's) Bird Banding Laboratory.
- If occupied burrows are identified during the surveys, passive relocation shall be performed in accordance with the CDFW-approved BUOW Exclusion and Relocation Plan. Artificial burrows shall be located as close as feasible to the affected existing burrows, but outside the area planned for construction disturbance. Artificial burrows shall be located within 100 meters (m) (approximately 325 feet) of the burrows they replace per current CDFW guidance, and the BUOW Exclusion and Relocation Plan shall stipulate this as a target to be achieved where feasible.
- Construction shall not proceed until passive relocation per the BUOW Exclusion and Relocation Plan has been accomplished and the Biologist has confirmed that burrows can be destroyed without injury or mortality to BUOW.
- Known and potentially occupied burrows shall be further assessed by the Biologist to determine whether nesting activity is taking place. If no eggs or chicks are present, the burrow shall be subject to passive relocation per the CDFW-approved BUOW Exclusion and Relocation Plan. If eggs or chicks are present, the burrow shall be protected in place by the establishment of a no-activity exclusion buffer. Buffer widths shall depend on the nature and level of activity planned in the vicinity as follows:

Time of Year	Level of Disturbance		
	Low	Medium	High
April 1–August 15	200 m (650 ft)	500 m (1,625 ft)	500 m (1,625 ft)
August 16–October 15	200 m (650 ft)	200 m (650 ft)	500 m (1,625 ft)
October 16–March 31	50 m (163 ft)	100 m (325 ft)	500 m (1,625 ft)

Nest buffers shall be delineated in the field using temporary construction fencing or another appropriate medium installed under the direct supervision of the qualified Biologist. No entry of personnel, equipment, or materials shall be permitted into the buffer area. Buffers shall remain in place until the Biologist has confirmed that the

young have fledged, are foraging independently, and are no longer dependent on the nest, or that the nest has been abandoned. Once the buffer has been removed, the nest burrow shall be subject to passive relocation per the CDFW-approved BUOW Exclusion and Relocation Plan.

MM BIO-1h Western Pond Turtle Protection

The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) requirements relative to western pond turtle, including the Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of any agreements for long-term maintenance and management responsibilities shall be completed prior to project groundbreaking.

If western pond turtle does not become listed under the federal Endangered Species Act and the federal BO and CWA Section 404 permit do not prescribe other requirements, the requirements of MM BIO-1o shall be substituted. In this case the applicable guidance shall be the Draft United States Geological Survey (USGS) western pond turtle (*Emys marmorata*) Visual Survey Protocol for the Southcoast Ecoregion.

MM BIO-1i Western Spadefoot Avoidance and Protection

The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) conditions relative to western spadefoot, including Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of agreements for long-term maintenance and management responsibilities shall be completed prior to project ground disturbance.

At a minimum, all AMMs identified in Mitigation Measure (MM) BIO-1e for California tiger salamander (CTS) shall also be required for western spadefoot. Surveys, relocation efforts, and activities related to exclusion barriers shall be combined for CTS and western spadefoot where this would increase efficiency and effectiveness. If, via the federal interagency consultation process, USFWS issues alternate requirements that would be equally or more protective, those shall be substituted.

If western spadefoot does not become listed under the federal Endangered Species Act and the federal BO and CWA Section 404 permit do not prescribe other requirements, the requirements of MM BIO-1o shall be substituted. In this case, surveys and, if warranted, relocation of individuals shall be conducted consistent with agency requirements in existence at the time of survey and with prevailing best conservation practices.

MM BIO-1j Compensation for Impacts on Vernal Pool Fairy Shrimp

The Vista Ranch Development applicant shall complete the Clean Water Act (CWA) Section 404 permitting process and obtain the necessary permit from the United States Army Corps of Engineers (USACE). The applicant shall then be responsible for implementing all permit conditions and United States Fish and Wildlife Service (USFWS) Biological Opinion (BO) requirements relative to vernal pool fairy shrimp (VPFS), including Avoidance and Minimization Measures (AMMs) and habitat compensation. Purchase of the Mitigation Site, establishment of the necessary conservation easement, and finalization of agreements for long-term maintenance and management responsibilities shall be completed prior to project ground disturbance.

MM BIO-1k Nesting Bird and Active Nest Protection

At a minimum, the following precautions shall be required to protect California Endangered Species Act (CESA)-listed bird species whose presence cannot be ruled out, as well as other special-status birds, and common species protected under the California Fish and Game Code (FGC) and/or the federal Migratory Bird Treaty Act (MBTA). With prior written approval from the California Department of Fish and Wildlife (CDFW)—and, if federally protected species are involved, United States Fish and Wildlife Service (USFWS)—equally protective measures may be substituted. The Vista Ranch Development applicant shall be responsible for implementing all measures.

- If vegetation removal or trimming, clearing/grubbing, or grading for any phase or sub-phase of the Vista Ranch Development commences during the nesting/breeding season of native bird species potentially nesting on or near the work site (February 1–September 15), the applicant shall retain a qualified Biologist to conduct a pre-construction survey for nesting birds. The survey shall take place no more than 2 weeks prior to the initiation of work. Surveys shall further comply with the following guidance, or the most current equivalent thereof:
  - CDFW Staff Guidance Regarding Avoidance of Impacts to Tricolored Blackbird Breeding Colonies on Agricultural Fields in 2015.
  - Swainson’s Hawk Technical Advisory Committee Recommended Timing and Methodology for Swainson’s Hawk Nesting Surveys in California's Central Valley.

- If no active nests of any bird species are documented and no nest-building activity is observed within the area to be disturbed for project construction (including staging and access), no further action shall be required.
- If nest-building activity is observed or active nests are found in areas that could be directly affected by project activities or in locations where they could be disturbed by construction activity and noise, the following measures shall be implemented, at a minimum.
  - No-disturbance buffer zone(s) shall be established for nest protection. Buffers shall remain in place for the remainder of the nesting season or until the Biologist determines that all young have fledged or that the nest has been abandoned. No entry of personnel, equipment, or materials into the no-activity buffer shall be permitted without authorization from CDFW (and if federally protected species are involved, USFWS).
  - Buffers shall be delineated in the field by or under the supervision of the Biologist, using temporary construction fencing or another suitable low-impact medium. The size of the buffer zone(s) shall be determined by the Biologist based on the species involved, their behavior, the amount of vegetative and other screening between the nest and the locations(s) where potentially disturbing activities would occur, and, if appropriate, other site-specific factors. The minimum buffer widths shall be as follows:
    - 500 feet for raptors other than Swainson's hawk;
    - 0.5 mile for Swainson's hawk;
    - 300 feet for tricolored blackbird;
    - 50 feet for all other species, unless modified by the Biologist based on site-specific observations.

    Buffers may be enlarged by taking into account factors such as the following:
    - Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; and
    - Sensitivity of the nesting species and behaviors of the individual nesting birds.

MM BIO-1l Compensation for Loss of Swainson's Hawk and White-tailed Kite Habitat

Planning for the preserve proposed to compensate for losses of special-status species habitat in Master Plan (MP) Area 1 shall take into account impacts on Swainson's hawk and white-tailed kite habitat and shall be guided by the California Department of Fish and Wildlife (CDFW)-approved mitigation ratios for losses of Swainson's hawk habitat as laid out in the CDFW Staff Report Regarding Mitigation for Impacts to Swainson's Hawks or most current equivalent. According to CDFW, those ratios are as follows:

- For projects within 1 mile of an active nest tree: 1 acre of foraging habitat for each acre of development authorized (1:1 ratio), or 0.5 acre of land that can be actively managed for prey production (0.5:1 ratio),

- For projects within 5 miles of an active nest tree but greater than 1 mile from the nest tree: 0.75 acre of foraging habitat for each acre of urban development authorized (0.75:1 ratio),
- For projects within 10 miles of an active nest tree but greater than 5 miles from an active nest tree: 0.5 acre of suitable foraging habitat for each acre of urban development authorized (0.5:1 ratio).

Mitigation lands shall be protected under a conservation easement funded by a management endowment.

Any variations from the requirements in this measure shall be subject to approval by CDFW. Final preserve boundaries shall also be subject to CDFW approval, as enforced through the State Incidental Take Permit (ITP) process, and shall be subject to the "No Jeopardy" standard.

MM BIO-1m Compensation for Loss of Tricolored Blackbird Habitat

Planning for the preserve proposed to compensate for losses of special-status species habitat in MP Area 1 shall take into account impacts on tricolored blackbird foraging habitat. At a minimum, compensatory mitigation shall be provided at a 1:1 ratio (1 acre of compensatory habitat provided for each acre of development). This ratio shall be adjusted if and as required by the California Department of Fish and Wildlife (CDFW).

MM BIO-1n American Badger Surveys and Den Protection

Prior to construction in each of the Vista Ranch Development phases, the applicant shall retain a qualified Biologist to conduct surveys for American badger. Surveys shall be conducted no less than 14 days and no more than 30 days prior to the beginning of construction (inclusive of mobilization on-site and site preparation) and shall cover all areas of suitable habitat for the species. Any individuals observed shall be allowed to leave the site of their own volition.

If a potential den is observed, the Biologist shall determine whether the den is occupied; this may require observation over a period of several days. Occupied dens shall be protected by a 50-foot-wide no-disturbance buffer. If the Biologist determines that the den is, or may be, an occupied natal den, the den shall be protected by a 250-foot-wide no-disturbance buffer. Buffers shall be delineated using orange construction fencing or another suitable measure installed by or under the direct supervision of the Biologist. Buffers shall be configured to allow any badgers present to leave the vicinity of the den.

Buffers shall remain in place until the Biologist determines that the den is no longer occupied. In the case of natal dens, this will require periodic observation until the

Biologist determines that the young are no longer dependent on the den and parental care for survival, or that the den has been abandoned.

MM BIO-1o Protection of Other Special-Status Wildlife

Prior to construction in each of the Vista Ranch Development phases, the applicant shall retain a qualified Biologist/Ecologist with experience in the Fresno County area to conduct comprehensive pre-construction surveys for special-status wildlife. Surveys shall be timed to allow follow-up, such as relocation of individuals and/or consultation with resource agency staff if warranted. Surveys shall be designed and implemented in consideration of the particular species with potential to be present, as identified in Table 3.4-3 of the Revised Draft Environmental Impact Report (Revised Draft EIR) and based on current habitat conditions in Master Plan (MP) Area 1; survey methods shall be consistent with prevailing best practices by species and with applicable agency guidance, which is currently available at https://wildlife.ca.gov/Conservation/Survey-Protocols (or updated versions thereof).

If no special-status wildlife or sign thereof is observed during the surveys, no further action is required.

If listed or candidate species or sign(s) thereof are observed on-site, the applicant shall consult with the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS) (depending on the species' listing status), and shall proceed in accordance with agency direction.

If non-listed species that qualify for another form of special-status in the State, or sign(s) thereof, are observed on-site, the applicant shall consult with CDFW and proceed in accordance with CDFW direction. Standard CDFW-approved approaches for species protection, such as 50-foot setbacks from potentially occupied American badger dens, shall be implemented prior to consultation with CDFW.

Follow-up actions for common (non-listed/non-special-status) species shall be consistent with the Biologist's professional judgment and current prevailing conservation best practices.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

No analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

MP Area 2

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, progressive development and extensive agricultural activity under both County and City general plans have resulted in a significant long-term cumulative impact related to the loss and degradation of habitat, particularly habitat for special-status species. Additional significant cumulative impacts are considered to exist at the species level where individual plant and wildlife species present in the area have been identified as qualifying for federal or State special status.

As discussed above, detailed information on special-status species use of MP Area 2 is currently unavailable, although reconnaissance observations suggest overall habitat conditions and the potential for both special-status plants and special-status wildlife to be present are generally similar to those in MP Area 1. It is therefore anticipated that development of MP Area 2 would have at least some potential to affect special-status plants and wildlife, both directly and through habitat modification. These impacts were identified as having the potential to be significant at the incremental level. To address this, the City would require implementation of MM BIO-1a and MM BIO-1b.

Together, MM BIO-1a and MM BIO-1b create a framework to protect biological and jurisdictional resources in MP Area 2 in a manner similar to that established for MP Area 1, discussed below. MM BIO-1a requires a comprehensive evaluation of biological resources as part of the development planning process(es) for MP Area 2, which is to include recommendations for any follow-up actions deemed warranted by the biologist who prepares the evaluation. It also requires the development applicant(s) to obtain any resource agency permits necessary to authorize development, and to implement the required permit conditions, including compensatory mitigation. MM BIO-1b requires pre-construction nesting bird surveys and protection of nests, eggs, and young. With these measures in place, impacts on special-status species and their habitat as a result of development in MP Area 2 were found to be less than significant at the incremental level.

Impacts on special-status plant and wildlife species and their habitat inherently represent contributions to the cumulative impact reflected by the species' special status. Thus, adequately mitigating the project-specific impact also mitigates the project's contribution to the cumulative impact. The contribution of future development to existing cumulative impacts on special-status plants, special-status wildlife, and their habitats is accordingly determined to be less than cumulatively considerable. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, progressive development and extensive agricultural activity under both County and City general plans have resulted in a significant long-term cumulative impact related to the loss and degradation of habitat, particularly habitat for special-status species. Additional significant cumulative impacts are considered to exist at the species level where individual plant and wildlife species present in the area have been identified as qualifying for federal or State special status.

As detailed above, development in MP Area 1 has the potential to result in the following potentially significant incremental impacts.

- Loss of special-status plant occurrences;
- Loss of special-status plant habitat;
- Direct injury/mortality and loss of habitat affecting the following special-status wildlife species:
  - CTS,
  - Crotch's bumble bee,
  - Western spadefoot,
  - Western pond turtle,
  - VPFS and California linderiella,
  - BUOW, American badger, andOther special-status species wildlife that have potential to be present (i.e., suitable habitat is available) but are not known to be present in MP Area 1
- Loss of foraging habitat for Swainson's Hawk, White-tailed Kite, Cooper's Hawk, and Tricolored Blackbird;
- Loss of nesting habitat for Swainson's Hawk, White-tailed Kite, and Cooper's Hawk; and
- Effects on nesting success for birds protected under the MBTA and/or California FGC.

Impacts on special-status plants would be addressed by implementation of MM BIO-1c, which requires additional protocol-level special-status plant surveys prior to any construction in MP Area 1. If future surveys document special-status plants in MP Area 1, they would be protected in place if possible, and transplanted to other suitable habitat if not, where they would be monitored and maintained over the long term to ensure survival. With this measure in place, impacts on special-status plants would be reduced consistent with current prevailing conservation practice and were determined to be less than significant at the incremental (project-specific) level. Because impacts on special-status species are inherently a contribution to a significant cumulative impact, this same mitigation measure would also ensure that the contribution of MP Area 1 development to existing impacts on special-status plants is less than cumulatively considerable—adequately mitigating the incremental impact of development in MP Area 1 also mitigates its contribution to the larger cumulative impact. No additional mitigation is required at the cumulative level, and no further analysis is warranted.

Because of its overall disturbed condition and history of agricultural use, MP Area 1 offers only low-quality habitat for the special-status plants known from the area. Consequently, the conversion of this area to developed uses is not expected to contribute substantially to regional loss of special-status plant habitat. Moreover, as discussed in more detail under Impact BIO-1, the Vista Ranch Development applicant is committed to preserving a large tract of conservation lands about 15 miles northwest of the SOI Expansion Area as compensation for losses of special-status species habitat. The proposed Mitigation Site offers habitat of much better quality and supports or has potential to

support multiple special-status plant species. In this context, the contribution of MP Area 1 development to regional loss of special-status plant habitat is determined to be less than cumulatively considerable. No additional mitigation is required at the cumulative level, and no further analysis is warranted.

Direct injury/mortality of special-status wildlife, and losses of special-status wildlife habitat, would also represent a potential contribution to existing cumulative impacts on these species. At the incremental (project-specific) level, these impacts would be addressed by the following mitigation measures.

- All special-status wildlife: MM BIO-1d, requiring WEAP training for sensitive habitats and special-status species to support the effectiveness of habitat- and species-specific measures.
- CTS: MM BIO-1e, requiring completion of the State ITP and CWA Section 404 permitting processes and adherence to all permit conditions (including AMMs and habitat compensation) and stipulating minimum AMMs for CTS protection.
- Crotch's bumble bee: MM BIO-1f, requiring completion of the State ITP process and adherence to all permit conditions (including AMMs and habitat compensation) and stipulating minimum AMMs for Crotch's bumble bee protection.
- BUOW: MM BIO-1g, requiring completion of the State ITP process and adherence to all permit conditions (including AMMs and habitat compensation) and stipulating minimum AMMs for BUOW protection.
- Western pond turtle: MM BIO-1h, requiring completion of the CWA Section 404 process and adherence to all permit conditions (including AMMs and habitat compensation), stipulating minimum AMMs for western pond turtle protection, and providing alternate mitigation in the event western pond turtle does not become federally listed (and thus is not covered by the USFWS BO for the Vista Ranch Development).
- Western spadefoot: MM BIO-1i, requiring completion of the CWA Section 404 process and adherence to all permit conditions (including AMMs and habitat compensation), stipulating minimum AMMs for western spadefoot protection, and providing alternate mitigation in the event western spadefoot does not become federally listed (and thus is not covered by the USFWS BO for the Vista Ranch Development).
- VPFS: MM BIO-1j, requiring completion of the CWA Section 404 permitting process and adherence to all permit conditions (including AMMs and habitat compensation). Because of the similarity in the species' habitat needs, MM BIO-1j would also address potential impacts on California linderiella, which is known to be present in MP Area 1, and other large vernal pool branchiopods if they are also present.
- Swainson's hawk, White-tailed kite, and Cooper's hawk: MM BIO-1k, which requires preconstruction nesting bird surveys and protection of nesting birds, occupied nests, eggs, and young, consistent with CDFW standards. As discussed in Impact BIO-1, impacts on adult Swainson's hawk, White-tailed kite, and Cooper's hawk individuals are considered unlikely due to the species' wariness and mobility. MM BIO-1l additionally requires that the needs of

Swainson's hawk and White-tailed kite be taken into consideration in planning for the mitigation preserve compensating for losses of special-status species habitat, and identifies minimum acceptable mitigation ratios, subject to final approval by CDFW; as discussed above, impacts related to loss of Cooper's hawk habitat were found less than significant at the incremental level due to this species' ability to adapt to and exploit developed environments.

- Tricolored blackbird: MM BIO-1k, which requires preconstruction nesting bird surveys and protection of nesting birds, occupied nests, eggs, and young, as identified above; and MM BIO-1m, which requires that the needs of Tricolored blackbird be taken into consideration in planning for the mitigation preserve, and identifies the minimum acceptable mitigation ratio, subject to final approval by CDFW.
- American badger: MM BIO-1n, requiring preconstruction surveys for American badger and prescribing protection for occupied badger dens during construction; as discussed above, impacts related to loss of potential American badger habitat were found less than significant at the incremental level because the species is not known to be using MP Area 1, and the proposed mitigation preserve (enforced under multiple mitigation measures called out above) would provide extensive acreage of higher-quality habitat that is known to be occupied by the species.

Impacts on all of these species were found to be less than significant at the incremental level with the mitigation measures listed above incorporated.

A number of other special-status wildlife species are known from the region but have never been observed within MP Area 1 and are considered unlikely to be present based on their known distribution and/or the generally fairly low quality of habitat on-site. They cannot, however, be entirely ruled out of consideration (see Table 3.4-3 and project-specific discussion above). The potential for impacts on these species would be addressed under MM BIO-1d, requiring WEAP training for special-status species issues, and MM BIO-1o, which stipulates preconstruction surveys per current agency guidelines and requires consultation with CDFW and/or USFWS for direction if listed species are observed. With these measures in place, potential impacts on the special-status wildlife species considered unlikely to be present were also determined to be less than significant at the incremental level.

As identified above, impacts on special-status wildlife species and their habitat inherently represent contributions to the cumulative impact reflected by the species' special status. Thus, adequately mitigating the project-specific impact also mitigates the contribution of the Vista Ranch Development to the cumulative impact. Moreover, for the listed and proposed/candidate species covered by the State ITP and/or ESA Section 7 interagency consultation process (CTS, Crotch's bumble bee, BUOW, western pond turtle, western spadefoot, and VPFS), the impacts of MP Area 1 buildout on listed species and their habitat, and compensation for those impacts, would be closely regulated by the State and federal Endangered Species Acts, under which the agencies cannot legally authorize actions that would put a species in jeopardy (that is, substantially worsen the existing cumulative impact on that species). Agency review and approval of compensation for impacts on other listed species would be subject to the same "No Jeopardy" standard, which, as explained in the incremental

analysis above, is also the level of stringency necessary to ensure that impacts are reduced below the level considered significant under CEQA. As discussed above, CDFW's review of compensation for impacts on White-tailed Kite would be similarly or more constrained, since White-tailed kite is a Fully Protected species. The contribution of the Vista Ranch Development to existing cumulative impacts on special-status wildlife and their habitat is accordingly determined to be less than cumulatively considerable. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement project-specific MM BIO-1a and MM BIO-1b; no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

Implement project-specific MM BIO-1c through MM BIO-1o; no additional mitigation is required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Sensitive Natural Communities

Impact BIO-2:	**The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.**

This analysis addresses sensitive natural communities other than wetlands, such as riparian habitat. Impacts on wetlands and other jurisdictional waters are discussed separately in Impact BIO-3 below.

SOI Expansion and Non-development Area

As discussed above, the proposed project does not include development or densification in the Non-development Area. As a result, it would have no potential to result in new or expanded loss or degradation of sensitive natural communities. There would be no impact, and no mitigation is required.

MP Area 2

As noted above, detailed information on biological resources within MP Area 2 is not currently available. Thus, there could be some potential for development in MP Area 2 to affect sensitive natural communities if any are present, and depending on the extent of loss or degradation, it is possible that impacts could rise to a significant level. To address this, the City would require implementation of MM BIO-1a, which would ensure that any sensitive natural communities in these areas are identified as part of the planning process for future development, that any resource agency permits required to authorize development in MP Area 2 are identified, and that development applicant(s) are required to conduct any follow-up measures identified as warranted by detailed biological studies in MP Area 2, including obtaining the necessary resource agency permits and abiding by all permit requirements. Implementation of MM BIO-2, described below, would provide a mechanism to avoid impacts on sensitive natural communities where possible and to compensate for impacts that cannot be avoided, consistent with resource agency guidance and any applicable permit requirements. With these measures in place and enforced through the City's entitlements process, impacts would be reduced to a less than significant level.

Vista Ranch Development/MP Area 1

No sensitive habitats (other than wetlands, discussed in Impact BIO-3 below) are present in MP Area 1.[85,86] With no sensitive natural communities present, development of the Vista Ranch Development would have no impact on such communities. No mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

MP Area 2

Implement MM BIO-1a and MM BIO-2.

MM BIO-2 Compensation for Loss/Degradation of Sensitive Natural Communities

During development in MP Area 2, sensitive natural communities—i.e., natural communities/vegetation types ranked S1–S3 in the California Department of Fish and Wildlife's (CDFW's) California Natural Community List or most current equivalent, and any identified in local or regional planning documents as sensitive and meriting protection—shall be avoided and protected in place where this is possible without significant loss of habitat function and value. If losses cannot be avoided, or if habitat value would be substantially decreased due to loss of connectivity or proximity to

[85] ECORP Consulting, Inc. (ECORP). 2023. Biological Resources Assessment for the Triangle Property Project - Prepared for Wilson Premier Homes. January.
[86] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

proposed development, compensatory habitat mitigation shall be required. Mitigation shall be provided by the development applicant, in a manner consistent with current prevailing conservation practice, the requirements of any resource agency permits required to authorize development, and the most current version of any applicable CDFW guidelines. Mitigation commitments shall be enforced by the City as Conditions of Approval (COAs) for development.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

No analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

MP Area 2

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, progressive development and extensive agricultural activity under both County and City general plans have resulted in a significant long-term cumulative impact related to the loss and degradation of sensitive natural communities, such as riparian habitat.

As acknowledged above, no detailed information on the presence of sensitive natural communities is currently available for MP Area 2. Detailed analysis of impacts on such communities in MP Area 2 was therefore determined to be speculative at this time, particularly as details of MP Area 2 development have not been fully fleshed out. However, as discussed above, development in MP Area 2 may have some potential for impacts on sensitive natural communities, and such impacts could be significant at the incremental level.

To address impacts on sensitive natural communities in MP Area 2, the City would require implementation of MM BIO-2, which requires avoidance of these habitat types where possible, and compensatory mitigation consistent with prevailing conservation practices and CDFW guidance where avoidance is not feasible and/or function and value would be compromised by development. With this requirement in place, impacts on sensitive natural communities as a result of MP Area 2 development are determined to be less than significant at the incremental level. Impacts are also determined to be less than cumulatively considerable, since this requirement would ensure that the overall function and value of existing sensitive natural communities is either protected in place or compensated for, such that there is no overall net loss. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

As identified above, no sensitive habitats (other than wetlands, discussed separately below) are present in MP Area 1. With no sensitive natural communities present, buildout of the Vista Ranch

Development would have no incremental impact on such communities, and no potential to contribute to the existing cumulative impact on them. No further analysis is warranted, and no mitigation is necessary at the cumulative level.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: No potential to contribute to cumulative impact.

Mitigation Measures

MP Area 2

Implement project-specific MM BIO-2; no additional mitigation is required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Jurisdictional Wetlands and Other Waters

Impact BIO-3:	**The proposed project would not 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.**

SOI Expansion and Non-development Area

No detailed information on the presence of wetlands or other jurisdictional waters in the Non-development Area is presently available. However, as discussed in the preceding impacts, the proposed project does not include development or densification in the Non-development Area and, thus, would have no potential to result in new or increased impacts on wetlands or other waters in this portion of the project area. There would be no impact, and no mitigation is required.

MP Area 2

No detailed information on the presence of wetlands in MP Area 2 is presently available, although some of the wetlands adjacent to the boundaries of MP Area 1 are known to extend into MP Area 2.[87] Detailed analysis of wetland impacts in MP Area 2 would therefore be speculative at this time. However, the potential for wetland impacts must be acknowledged. Impacts could include both construction-period degradation, as well as fill or removal resulting in permanent loss of wetlands.

Development of MP Area 2 is likely to proceed in a manner similar to that planned MP Area 1—in large-scale phases exceeding the 1-acre threshold at which a SWPPP is required. In this case,

[87] Vollmar Natural Lands Consulting (Vollmar). 2023. Delineation of Potential Jurisdictional Aquatic Resources. November.

construction-period impacts on wetlands planned "to remain" would be avoided and reduced through measures required by the SWPPP, and would be less than significant, with no mitigation required.

However, if development of any portion of MP Area 2 takes place in phases smaller than 1 acre, SWPPP protections would not be in place, and impacts on wetlands during construction could be significant. To address this, the City would require implementation of MM BIO-3a and MM BIO-3b. With these measures in place, (1) any wetlands within MP Area 2 would be identified and their jurisdictional boundaries determined, (2) appropriate permit authorization would be obtained (and permit conditions enforced) for impacts on wetlands, (3) wetland losses would be compensated in accordance with the State's "no net loss" policy, and (4) wetlands planned "to remain" within smaller construction phases not subject to the SWPPP requirement would be protected during construction. With these measures in place, construction-period and long-term impacts on any wetlands present within MP Area 2 would be avoided and reduced to the extent feasible, consistent with regulatory requirements and current best practices. Therefore, impacts would be less than significant with mitigation incorporated. Residual impacts, if any, are also considered less than significant.

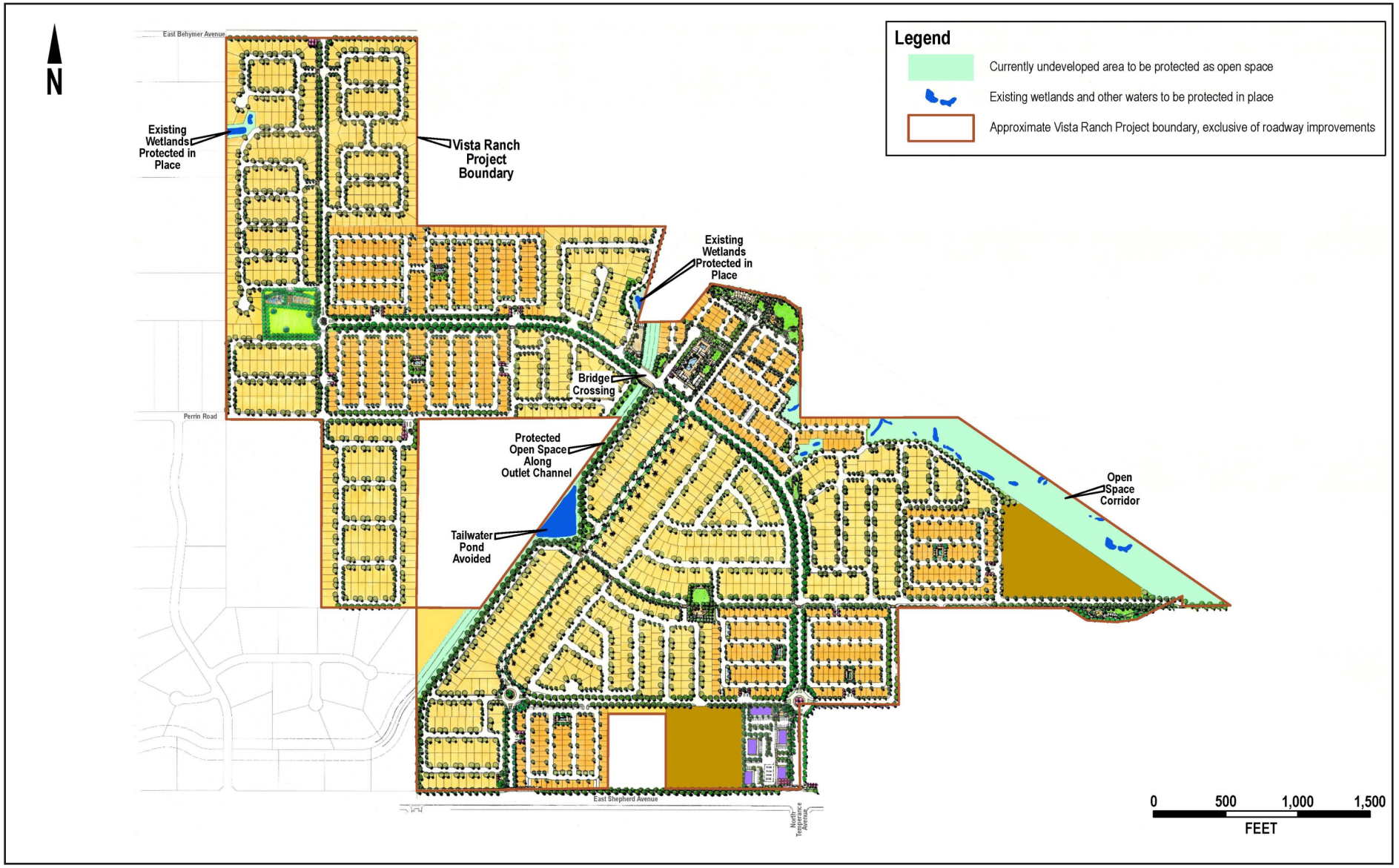
Vista Ranch Development/MP Area 1

Construction

Exhibit 3.4-2 shows the jurisdictional wetlands and other waters within MP Area 1. As discussed in more detail in Chapter 2, Project Description, the applicant has configured the proposed development layout for the Vista Ranch Development to avoid wetlands to the extent feasible, with avoided wetlands surrounded by protected open space and supplied with treated stormwater to maintain their hydrology (see Exhibit 3.4-4).

However, construction within MP Area 1 would involve extensive ground disturbance, with the potential to increase the delivery of sediment to wetlands intended for protection. Construction would also involve the use of multiple substances, such as vehicle and equipment fuels and lubricants, cement, paints, adhesives, and paving media, that could degrade water quality and wetland function if spills or releases occur. In addition, there would be potential for accidental incursions into wetland areas by equipment and personnel, potentially resulting in direct disruption of wetland geomorphology and hydrology.

As discussed in Section 3.10, Hydrology and Water Quality, Impact HYD-1, individual project phases within MP Area 1 would substantially exceed the 1-acre threshold at which coverage under the State Water Board's Construction General Permit is required. This requires preparation and implementation of a SWPPP detailing the measures that would be in place to control erosion and sediment runoff and to prevent and respond to spills of potential pollutants. In the extremely unlikely event that construction activities for any portion of MP Area 1 are concentrated on less than 1 acre, those activities would also require Construction General Permit coverage and SWPPP implementation since they are part of a larger undertaking disturbing more than 1 acre (see Section 3.4.3, Regulatory Framework, above). The State requires that SWPPPs be prepared, amended, and certified by a State-certified QSD and implemented either by a QSD or a State-certified QSP. With the SWPPP requirement in place, impacts related to wetland degradation during construction would be reduced to less than significant, consistent with regulatory requirements and current best practices. No mitigation is required.



Source: Redtail Consulting 2023. Modified from Wilson Premier Homes 2025, 05/12/2026.

Exhibit 3.4-4
Wetland Avoidance in MP Area 1

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Wetland Losses

As identified above, the applicant has configured the proposed layout for the Vista Ranch Development to avoid wetlands to the extent feasible (Exhibit 3.4-4). However, it is not possible to avoid wetland impacts entirely while still achieving the objectives of the Vista Ranch Development; a total of just under 0.5 acre of wetlands would be filled or removed as a result of development, as itemized in Table 3.4-8. All of these impacts would be permanent. Impacts would be incurred progressively over about the next 10 years, as the Vista Ranch Development moves in phases toward full buildout. As permanent losses of jurisdictional wetlands, these impacts are considered potentially significant under CEQA.

Table 3.4-8: Wetland Losses Due to Vista Ranch Development

Wetland Type	Acres Impacted
Outlet Channel, wetland channel and fringing wetland margin	0
Depressional wetland basin	0.061
Stockpond	0.434
Total wetland impact:	**0.495**

Source: Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation.

Because impacts on jurisdictional wetlands and other waters are anticipated, the Vista Ranch Development applicant has applied for a CWA Section 404 permit from USACE and would also apply for CWA Section 401 Water Quality Certification from the RWQCB and enter into a Streambed Alteration Agreement with CDFW. As discussed under Impact BIO-1, the applicant proposes to compensate for impacts on special-status species habitat under the State ITP and federal interagency consultation processes by dedicating extensive conservation lands in the Four Corners area near Madera. In addition to uplands, the proposed Mitigation Site supports a robust network of vernal pool/vernal swale complexes, ephemeral streams, and a seasonal stream corridor. All of these resources are in substantially better condition and offer greater ecological function and value than the existing wetlands within MP Area 1.[88,89]

The resource agencies (USACE, RWQCB, and CDFW) may accept preservation of aquatic resources at the Mitigation Site as compensation for wetland impacts due to development of MP Area 1. If the agencies determine that preservation is inadequate as compensation, the applicant would likely be required to purchase aquatic resources credits from an agency-approved mitigation bank serving the project area in addition to preserving lands as compensation for losses of special-status species habitat. In either case, the agency-approved mitigation approach would be required to be in place (conservation lands acquired and placed under conservation easement and/or mitigation credits

[88] Vollmar Natural Lands Consulting (Vollmar). 2021. Madera Terrace Conservation Bank Draft Prospectus. November.
[89] Redtail Consulting. 2025. Application for Incidental Take Authorization for California Tiger Salamander, San Joaquin Kit Fox, Crotch's Bumble Bee, and Western Burrowing Owl. March.

purchased) prior to groundbreaking in MP Area 1 and must meet the State's "no net loss" standard for impacts on wetlands.[90] This requirement would be enforced through the permit mechanism. To further enforce adherence to the permit process and associated requirements, including the provision of compensatory mitigation for wetland losses, the City would require implementation of MM BIO-3c. With this measure in place, impacts on wetlands due to construction in MP Area 1 would be fully offset under resource agency oversight and subject to resource agency approval and the State's "no net loss" policy. Therefore, impacts would be less than significant with mitigation incorporated.

Long-Term Degradation of Protected Wetlands

Over the long term, although the wetlands that are avoided and preserved on-site in MP Area 1 would be buffered by dedicated open space and protected with fencing and signage, there may still be some potential for wetland degradation due to the proximity of development. However, there is currently no buffer in place around these wetlands; they are exposed to the effects of existing developed and agricultural uses and to other potential future uses in the event the proposed project does not proceed. Consequently, risks to the health and function of remaining wetlands are not expected to worsen substantially following development, and the addition of buffers around remaining wetlands may offer some level of benefit by comparison with current conditions. Long-term impacts on remaining wetlands are therefore considered less than significant. No mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

MM BIO-3a Wetland Evaluation, Protection, and Compensation

If the Biological Resources Evaluation (BRE) conducted under Mitigation Measure (MM) BIO-1a identifies the presence of potentially jurisdictional wetlands or other waters within Master Plan (MP) Area 2, the applicant(s) proposing development shall be required to:

- retain a qualified Biologist/Ecologist to conduct a preliminary delineation of potentially jurisdictional wetlands and other waters on the development site, consistent with current applicable United States Army Corps of Engineers (USACE) standards;
- obtain USACE verification of the preliminary jurisdictional delineation (either an Approved Jurisdictional Determination [AJD] or Preliminary Jurisdictional Determination [PJD] is acceptable);

[90] See discussion of California Executive Order (EO) W-59-93 under Regulatory Framework above. The Regional Water Quality Control Board (RWQCB) cannot issue water quality certification until or unless it determines that a project would not result in net loss of wetland acreages and values.

- avoid wetlands and other waters to the extent feasible during development; if impacts on wetlands and other waters cannot be entirely avoided to the satisfaction of the regulatory agency/agencies with jurisdiction (USACE, Regional Water Quality Control Board [RWQCB], and/or the California Department of Fish and Wildlife [CDFW]), obtain aquatic resources permits to authorize impacts on wetlands/waters as a result of development; and
- provide mitigation consistent with resource agency requirements identified and enforced through the permit process.

MM BIO-3b Protection for Wetlands in Smaller Construction Phases

In the event development of any portion of Master Plan (MP) Area 2 occurs in phases with an extent of less than 1 acre, and biological/jurisdictional studies conducted under Mitigation Measure (MM) BIO-1a and/or MM BIO-3a have determined that wetlands or other jurisdictional waters are present within or adjacent to the construction disturbance footprint (inclusive of access and staging), the following requirements shall apply. If alternate requirements that are equally or more protective are identified through the State or federal aquatic resources permitting process(es), those shall be substituted.

- Work in immediate proximity to wetlands/waters "to remain" shall be limited to the dry season.
- No work shall occur during rain or within 24 hours following any rainfall event of 0.25 inch or more of rain in a 24-hour period.
- Best Management Practices (BMPs) shall be implemented for all ground-disturbing activities to prevent siltation and contaminated runoff to wetlands and water bodies within and adjacent to the work area.
- BMPs shall include, but may not be limited to, the following:
  - Before work begins, a qualified Biologist/Ecologist shall delineate sensitive habitat (i.e., wetlands, other jurisdictional waters, and riparian habitat) to be avoided, using temporary construction fencing, or another appropriate low-impact/high-visibility medium. No entry of personnel, equipment, or materials shall be permitted into delineated avoidance areas;
  - Runoff and sediment control measures, such as straw wattles, filter rolls, filter fences, and/or silt fences, shall be used to contain disturbed soil materials during excavation and other ground disturbance. Runoff control shall be in place prior to groundbreaking. If straw wattles are used, they shall consist of certified sterile, weed-free rice straw or similar, suitable for use in sensitive habitat. If filter fences or mesh are used, they shall consist of materials, and employ a design, approved by the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS) as safe for amphibians and reptiles. No monofilament materials shall be used;
  - If ground disturbance occurs in a vegetated area that is not planned for immediate construction, hardscaping, or landscaping, the disturbed area shall be

reseeded as soon as feasible following the completion of work, using a certified weed-free native species seed mix appropriate to the project region and approved by a qualified Biologist/Ecologist;

- Excavation spoils, fill, aggregate, and similar granular materials shall be stockpiled away from sensitive habitat, in areas that are relatively level, and relatively free of vegetation. Stockpiles shall be located as far as reasonably feasible from the limits of sensitive habitat, and runoff control measures as described above shall be used to prevent delivery of sediment to wetlands, other waters, and riparian areas. If wattles are used, they shall consist of certified sterile, weed-free materials, as identified above; no monofilament materials shall be used. Any excavated materials not planned for reuse on-site shall be promptly removed to appropriate permanent disposal locations;
- Substances potentially harmful to water quality and/or aquatic life shall be contained in water-tight containers and stored away from water bodies;
- All diesel- and gasoline-powered construction equipment and tools, including generator units, shall be inspected for leaks and damage prior to mobilization, and leaks shall be repaired before equipment/tools are brought on-site;
- Fueling, lubrication, and maintenance of vehicles and equipment shall be conducted as far as reasonably feasible from wetlands and waterbodies and shall take place off-site, if possible. Equipment staging shall also be located as far as reasonably feasible from wetlands and water bodies. If on-site fueling, maintenance, or repairs are required, containment measures such as drip pans shall be required;
- The contractor shall be required to develop a Spill Response Plan for City approval. The Spill Response Plan shall detail actions to be taken in response to spills and discharges of fuels, lubricants, concrete/concrete washout, and any other substances potentially harmful to water quality and/or aquatic life;
- During all work, appropriate types and quantities of materials shall be maintained on-site to contain any spills or releases of materials and prevent them from entering sensitive habitat and jurisdictional waters;
- In the event of a spill, appropriate spill response procedures shall be initiated as soon as the incident is discovered. The contractor shall be required to notify City staff as soon as feasible and in no case more than 24 hours after the occurrence; a designated City contact shall be specified in the project construction documents for this purpose. If there is any potential for the spill to enter jurisdictional waters, the City shall notify the Regional Water Quality Control Board (RWQCB) and CDFW and shall proceed in accordance with agency direction. The United States Army Corps of Engineers (USACE) shall also be consulted if construction is subject to federal permit requirements; and
- No concrete shall be poured if the 5-day forecast indicates the potential for rain. For concrete pouring in proximity to water bodies, (1) backup containment structures shall be put in place to ensure that no concrete or concrete runoff

enters wetlands or waters, and (2) a designated concrete monitor shall oversee concrete pouring to ensure that containment structures are functioning properly.

Vista Ranch Development/MP Area 1

MM BIO-3c Wetland Protection and Compensation

In addition to Clean Water Act (CWA) Section 404 permitting as required by Mitigation Measure (MM) BIO-1e, the Vista Ranch Development applicant shall complete the CWA Section 401 permitting process and enter into a Streambed Alteration Agreement with the California Department of Fish and Wildlife (CDFW) per California Fish and Game Code (FGC) Section 1602 and shall obtain the necessary aquatic resources permits from the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and the CDFW. The applicant shall then be responsible for implementing all permit conditions relative to jurisdictional wetlands and other waters, including Avoidance and Minimization Measures (AMMs) and habitat compensation.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

No analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

MP Area 2

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, progressive development and extensive agricultural activity under both County and City general plans have resulted in a significant long-term cumulative impact related to the loss and degradation of jurisdictional wetlands and other waters.

As acknowledged above, no detailed information on the presence of jurisdictional wetlands/waters is currently available for MP Area 2, although some of the wetlands adjacent to the boundaries of MP Area 1 are known to extend into MP Area 2. Detailed analysis of impacts on wetlands in MP Area 2 was therefore determined to be speculative at this time, particularly as details of MP Area 2 development have not been fully fleshed out. However, development in MP Area 2 may have potential for impacts on jurisdictional wetlands/waters, and such impacts could be significant at the incremental level.

To address impacts on wetlands/waters in MP Area 2, the City would require implementation of MM BIO-3a and MM BIO-3b, which requires further evaluation of the presence of wetlands/waters within MP Area 2, with avoidance to the extent feasible, and acquisition of applicable aquatic resources

permits from USACE, RWQCB, and/or CDFW if complete avoidance is not feasible. Development applicants in MP Area 2 would also be required to mitigate any losses of wetlands/waters to the satisfaction of the agencies with jurisdiction. With this mitigation incorporated, impacts on wetlands/waters in MP Area 2 were found to be less than significant at the incremental level.

The potential for MP Area 2 development to contribute to the cumulative impact on wetlands and waters would also be less than cumulatively considerable with this mitigation in place, because of the State's "no net loss and long-term net gain" policy for authorization of impacts on wetlands/waters; even if USACE permitting—which requires CWA Section 401 water quality certification—is not triggered, the RWQCB's authorization of wetlands/waters impacts under the state's Porter-Cologne Act is governed by the same "no net loss" policy that applies to water quality certification. This oversight would effectively prevent cumulatively considerable wetland losses/wetland degradation due to MP Area 2 development. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, progressive development and extensive agricultural activity under both County and City general plans have resulted in a significant long-term cumulative impact related to the loss and degradation of jurisdictional wetlands and other waters.

As discussed above, the development layout for the Vista Ranch Development has been configured to avoid impacts on jurisdictional wetlands and waters to the extent feasible, with remaining wetlands buffered by protected open space, as described in Chapter 2, Project Description, and shown in Exhibit 3.4-4. Nonetheless, buildout in MP Area 1 would result in permanent loss of 0.495 acre of wetlands that cannot be avoided while still accomplishing project objectives. This is addressed by MM BIO-3c, which requires the applicant to complete the aquatic resources permitting process with USACE, the RWQCB, and CDFW and to implement all permit conditions relative to jurisdictional wetlands and other waters, including AMMs and any habitat compensation required by the agencies. With this measure in place, impacts of the Vista Ranch Development on wetlands were determined to be less than significant at the incremental level.

Critically from the cumulative perspective, the RWQCB's Clean Water Act Section 401 Water Quality Certification process is governed by the "no net loss and long-term gain" objective established by EO W-59-93 (see discussion in *Regulatory Framework* above). This means that the RWQCB cannot issue the certification needed to authorize USACE permitting under Clean Water Act Section 404 and ultimately enable construction in MP Area 1 without assurance that wetland losses will be compensated in a manner that accomplishes "no net loss and long-term gain" in wetland acreage and values—effectively setting a standard that precludes any substantive contribution to cumulative wetland losses as a result of MP Area 1 development. Impacts are accordingly determined to be less than cumulatively considerable. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2: Implement project-specific MM BIO-3a and MM BIO-3b; no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1: Implement project-specific MM BIO-3c; no additional mitigation is required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2

Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Fish and Wildlife Movement Corridors and Nursery Sites

Impact BIO-4:	**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 wildlife nursery sites.**

SOI Expansion and Non-development Area

The proposed project includes the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that have not requested and would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. As such, approval of the SOI Expansion would not alter baseline conditions with regard to wildlife movement corridors or wildlife nursery sites, should any be present. There would be no impact, and no mitigation is required.

MP Area 2

Wildlife Movement Corridors

As discussed in the prior impacts, no detailed information on biological resources within MP Area 2 is currently available. Thus, the potential for impacts on wildlife movement or migratory corridors as a result of development in MP Area 2 cannot be ruled out, and it is possible that impacts could be significant. However, implementation of MM BIO-1a would

- determine whether MP Area 2 support wildlife movement or migratory corridors; and

- provide an enforceable mechanism to avoid, reduce, and/or compensate for impacts on such corridors if they are present.

With this measure in place, impacts on wildlife movement and migratory corridors as a result of development in MP Area 2 would be (1) identified and (2) avoided or appropriately compensated. Therefore, impacts would be less than significant with mitigation incorporated.

Wildlife Nursery Sites

Similar to wildlife movement and migratory corridors, no information on the presence of wildlife nursery areas or features is currently available for MP Area 2. Thus, the potential for significant impacts on wildlife nurseries as a result of development in MP Area 2 cannot be ruled out. At worst, it is possible that impacts could be significant. However, implementation of MM BIO-1a would:

- determine whether any portion of MP Area 2 supports wildlife nurseries by requiring detailed biological studies that include evaluation of habitat conditions and species usage in the area planned for development; and
- provide an enforceable mechanism to avoid, reduce, and/or compensate for impacts on wildlife nurseries, if they are present, by requiring that detailed biological studies in MP Area 2 prescribe:
  - measures to avoid, reduce, and compensate for impacts on wildlife nursery sites, consistent with current best conservation science; and
  - measures to avoid, reduce, and compensate for impacts on special-status species and their habitat (including breeding habitat), consistent with current adopted CDFW and/or USFWS agency protocols.

MM BIO-1a also provides a mechanism to ensure that MP Area 2 project applicants obtain and abide by the requirements of any resource agency permits identified as necessary to authorize development. Such requirements would include compensation for loss of special-status species nurseries if appropriate; for listed and proposed/candidate species, compensation would be subject to the "No Jeopardy" standard. Therefore, impacts on wildlife nurseries as a result of development in MP Area 2 would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Wildlife Movement Corridors

No wildlife movement or migratory corridors have been identified within MP Area 1.[91] Therefore, the Vista Ranch Development would have no impact on wildlife movement or migratory corridors. No mitigation is required.

[91] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

Wildlife Nursery Sites

The only wildlife nursery areas identified in MP Area 1 are the wetlands where CTS, western spadefoot, and/or large vernal pool branchiopods are known to breed. As discussed in Impacts BIO-1 and BIO-3 above, the Vista Ranch Development would result in fill/removal of some of these features, constituting a potentially significant impact.

However, these losses of habitat are being avoided to the extent possible (see Exhibit 3.4-4 and Impact BIO-3), and unavoidable losses, as well as long-term decreased utility of the habitat that remains in place, would be compensated through the State and federal permit mechanisms described above, as enforced through MMs BIO-1e, BIO-1i, and BIO-1j. As discussed in Impact BIO-1, compensation for losses of CTS, western spadefoot, and VPFS habitat would be subject to the "No Jeopardy" standard, which also ensures reduction of impacts to a level less than significant under CEQA. Compensation for losses of habitat for other vernal pool branchiopods, such as California linderialla, would effectively be subject to the "No Jeopardy" standard as well because these species' habitat needs are so similar to those of VPFS—that is, compensating for losses of VPFS breeding habitat also compensates for losses of breeding habitat for other vernal pool branchiopods. As discussed above, the Vista Ranch Development would require resource agency permitting to proceed, and neither USFWS nor CDFW can authorize activities that would place a listed or proposed/candidate species' survival in the project region in jeopardy, which is the same standard required to ensure that impacts on the species are less than significant under CEQA. Consequently, impacts on wildlife nurseries due to the Vista Ranch Development would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM BIO-1a.

Vista Ranch Development/MP Area 1

Implement MM BIO-1e, MM BIO-1i, and MM BIO-1j.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

No analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

MP Area 2

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, particularly in developed/developing areas, significant cumulative impacts could be argued to exist with regard to the disruption of wildlife movement corridors and the loss or degradation of wildlife nursery sites.

Wildlife Movement Corridors

As discussed in the impacts above, no detailed information on biological resources within MP Area 2 is currently available; thus, the potential for impacts on wildlife movement/migratory corridors as a result of MP Area 2 development cannot be ruled out, and it is possible that impacts could be significant at the incremental level. However, implementation of MM BIO-1a, described above, would

- determine whether MP Area 2 supports wildlife movement or migratory corridors
- provide an enforceable mechanism to avoid, reduce, and/or compensate for impacts on such corridors if they are present

With this measure in place, impacts on wildlife movement and migratory corridors as a result of development in MP Area 2 would be identified and avoided or appropriately compensated, and were found less than significant at the incremental level. The same mitigation measure would serve to avoid/reduce the contribution of MP Area 2 development to the existing cumulative impact with regard to disruption of wildlife movement corridors/wildlife migratory corridors consistent with current best conservation practices. The contribution of MP Area 2 to this impact would therefore be less than cumulatively considerable; no further analysis is warranted, and no additional mitigation is required at the cumulative level.

Wildlife Nursery Sites

As discussed above, no information on the presence of wildlife nursery areas is currently available for MP Area 2; the potential for impacts on wildlife nurseries as a result of development in MP Area 2 thus cannot be ruled out, and it is possible that impacts could be significant at the incremental level. The potential for significant impacts would be addressed by implementation of MM BIO-1a, which defines a process to determine whether any portion of MP Area 2 supports wildlife nurseries, and provides an enforceable mechanism to avoid, reduce, and/or compensate for impacts on wildlife nurseries if they are present. With this measure in place, impacts on wildlife nursery sites in MP Area 2 were found less than significant at the incremental level. Because

(1) avoidance/reduction/compensation under MM BIO-1a would be guided by the “No Jeopardy” standard for listed and proposed/candidate species and by current best conservation practices as informed by CDFW and USFWS guidance for non-listed species, and

(2) regional risk to a species’ survival is an inherently cumulative issue,

this measure would also ensure that the contribution of MP Area 2 development to the existing cumulative impact on wildlife nursery sites is reduced to a less than cumulatively considerable level. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

As described above, the geographic scope for the cumulative analysis is the SOI Expansion Area and a 2-mile buffer surrounding the SOI Expansion Area. Within this context, particularly in developed/developing areas, significant cumulative impacts could be argued to exist with regard to the disruption of wildlife movement corridors and the loss or degradation of wildlife nursery sites.

Wildlife Movement Corridors

As identified above, no wildlife movement or migratory corridors have been identified within MP Area 1.[92] The Vista Ranch Development would thus have no incremental impact on wildlife movement or migratory corridors, and no potential to contribute to the cumulative impact with regard to disruption of wildlife movement corridors. There would be no contribution to the cumulative impact; no further analysis is warranted, and no mitigation is required at the cumulative level.

Wildlife Nursery Sites

As identified above, the only wildlife nursery areas identified in MP Area 1 are the wetlands where CTS, western spadefoot, and/or large vernal pool branchiopods are known to breed. The Vista Ranch Development would unavoidably result in fill/removal of some of these features, which represents a potentially significant impact at the incremental level. However, unavoidable losses of wetland nursery sites would be compensated through the State and federal permit mechanisms described above, as enforced through MM BIO-1e, MM BIO-1i, and MM BIO-1j; compensation for losses of CTS, western spadefoot, and VPFS habitat would be subject to the “No Jeopardy” standard, which also ensures reduction of impacts to a level less than significant under CEQA. Losses of habitat for other vernal pool branchiopods, such as California linderialla, would also—indirectly—be subject to the “No Jeopardy” standard because these species’ habitat needs are so similar to those of VPFS. Accordingly, with MM BIO-1e, MM BIO-1i, and MM BIO-1j in place, impacts on wildlife nurseries due to development of MP Area 1 were found less than significant at the incremental level.

As discussed above, the Vista Ranch Development would require resource agency permitting to proceed, and neither USFWS nor CDFW can authorize activities that would place a listed or proposed/candidate species’ survival in the project region in jeopardy. Because risk to a species’ survival at the regional level is an inherently cumulative issue, adherence to the “No Jeopardy” standard would also render the contribution of the Vista Ranch Development less than cumulatively considerable. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.

[92] Vollmar Natural Lands Consulting (Vollmar). 2025. Biological Assessment for Endangered Species Act Section 7 Consultation. October.

MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement project-specific MM BIO-1a; no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

Implement project-specific MM BIO-1e, MM BIO-1i, and MM BIO-1j; no additional mitigation is required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Local Policies or Ordinances

Impact BIO-5:	**The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.**

A significant impact related to consistency with local policies or ordinances would occur if the proposed project would conflict with any currently adopted and applicable local plans, policies, or ordinances that protect biological resources, such as an existing tree preservation policy or ordinance. such that the proposed project could not be approved or implemented in compliance with those requirements. Consistent with CEQA, this threshold is evaluated based on the regulatory framework in effect at the time of project approval and does not consider hypothetical or speculative future policies or ordinances that have not been adopted.

SOI Expansion and Non-development Area

The proposed project would include the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are included as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would have no potential to result in conflict with any local policies or ordinances protecting biological resources, such as tree preservation policies or ordinances. There would be no impact, and no mitigation is required.

MP Area 2

Local Policies

At this time, no development planning has been carried out for MP Area 2. Detailed analysis of the consistency of future development in these areas with City policies protecting biological resources would therefore be speculative and thus inconsistent with CEQA Guidelines Section 15145. However, it is reasonably foreseeable that any future development in MP Area 2 would undergo a review and entitlements process similar to that now in progress for the Vista Ranch Development in MP Area 1, since this is standard City procedure. Such a process would entail evaluation of consistency with all relevant City policies and would afford a mechanism to enforce consistency, including enforcement of the mitigation measures identified in this Revised Draft EIR. With the City's development review and enforcement process in place, no impact related to conflict with City policies protecting biological resources is anticipated, and no mitigation is expected to be necessary.

Local Ordinances

No heritage trees have been identified within MP Area 2 as of this time, and some of the trees that could conceivably need to be removed for future development in MP Area 2 may qualify as trees on developed single-family properties and could thus be exempt from permit requirements under the Tree Protection Ordinance. However, street trees in the area immediately north of East Shepherd Avenue and west of North Armstrong Avenue may be considered parkway or public property trees, and other trees in this area may have been planted subject to development or building permit conditions. Removal of any such trees would require a permit under the Tree Protection Ordinance. Other trees throughout MP Area 2 may be subject to the City permit requirement based solely on their size.

Nonetheless, any development planned for MP Area 2 would be subject to the City entitlements process and as such would undergo a similar level of review to that now in progress for entitlement of the Vista Ranch Development in MP Area 1. This would provide a mechanism to enforce the Tree Protection Ordinance. Consequently, no impact related to conflict with the Tree Protection Ordinance is anticipated due to development in MP Area 2, and no mitigation is required.

Vista Ranch Development/MP Area 1

Local Policies

As discussed in Section 3.4.3, Regulatory Framework, above, the General Plan identifies a number of policies relevant to biological resources. Table 3.4-9 assesses the consistency of the proposed Vista Ranch Development with applicable General Plan policies.

Table 3.4-9: Consistency of Vista Ranch Development with General Plan Policies for Biological Resources

Policy	Consistency of Vista Ranch Development
Land Use Policy 6.2.G: Preserve open space, farmland, natural beauty, and critical environmental areas.	As shown in Exhibit 3.4-4 and discussed in Impact BIO-3 above, the Vista Ranch Development has been configured to avoid impacts on wetlands to the extent feasible. Avoided wetlands would be preserved within protected open space, providing natural visual amenities for the new community. Development planning also explicitly prioritizes embracing and capitalizing on natural views of the Sierra Nevada afforded by MP Area 1. Therefore, the Vista Ranch Development is consistent with Land Use Policy 6.2.G.
Land Use Policy 6.2.L: Support actions that encourage environmental resource management.	As noted above, the Vista Ranch Development would avoid impacts on wetlands to the extent feasible. Additionally, as discussed in more detail in Impacts BIO-1 and BIO-3, the applicant proposes to compensate for unavoidable impacts on special-status species, their habitats, and aquatic resources through in-perpetuity preservation of a large tract of high-quality conservation lands (the Mitigation Site) in the Four Corners area near Madera, where conservation is an agency-identified priority. To that end, the applicant has been engaged in ongoing discussions with the USACE, USFWS, CDFW, and RWQCB regarding the extent and configuration of the preserve lands, and the final configuration and management of the preserve would be subject to approval by these agencies under the regulatory permits required to authorize the Vista Ranch Development. Compliance with this compensatory mitigation requirement would be enforced by the resource agencies through the regulatory permitting processes and by the City through MMs BIO-1e, BIO-1f, BIO-1g, BIO-1h, BIO-1i, BIO-1j, BIO-1l, BIO-1m, BIO-1n, and BIO-3c. This combination of avoidance and compensation is consistent with Land Use Policy 6.2.L's encouragement of natural resources management, with the responsible planning and management approach mandated by Open Space and Conservation Policy 2.1, and with Open Space and Conservation Policy 2.6's requirement to protect biological resources through conservation of high-quality habitat. The City's enforcement of the mitigation measures listed above constitutes compliance with Land Use Policy 6.2.L and Open Space and Conservation Policies 2.1 and 2.6.
Open Space and Conservation Policy 2.1: Stewardship. Promote responsible planning and management of land and resources among property owners.	
Open Space and Conservation Policy 2.6: Biological resources. Support the protection of biological resources through the conservation of high-quality habitat area.	
Open Space and Conservation Policy 2.7: Native plants. Encourage the use of native and climate-appropriate plant species and prohibit the use of plant species known to be invasive.	The landscape planting palette for the Vista Ranch Development is laid out in the Master Plan (Appendix B). Permissible tree species include a mixture of California native species such as western redbud (*Cercis occidentalis*), western sycamore (*Platanus racemosa*), coast live oak (*Quercus agrifolia*), Valley oak (*Q. lobata*), and California fan palm (*Washingtonia filifera*), as well as drought-tolerant non-native species like Italian cypress (*Cupressus*

Policy	Consistency of Vista Ranch Development
	sempervirens 'Stricta') and other ornamental species appropriate to the climate and soils of the City. Permissible shrubs and herbaceous plantings also represent a mixture of native and non-native species suited to the project area's climate and soils, although the emphasis on non-native species is slightly higher. The majority of the non-native species included in the landscape palette are considered non-invasive. The landscape palette does include two species that appear on the California Invasive Plant Council's (Cal-IPC's) list of invasive species to be avoided for landscaping use: European olive (*Olea europaea*) and Bermuda grass (*Cynodon dactylon*). However, the varieties stipulated by the landscape palette are considered non-invasive: the Little Ollie olive (*O. europea* 'Montra') and the Tifdwarf hybrid of Bermuda grass. Landscape planning for the Vista Ranch Development is therefore considered consistent with the requirements of Open Space and Conservation Policy 2.7.

Notes:
Cal-IPC = California Invasive Plant Council
CDFW = California Department of Fish and Wildlife
FCS = FirstCarbon Solutions
MM = Mitigation Measure
MP = Master Plan
RWQCB = Regional Water Quality Control Board
USACE = United States Army Corps of Engineers
USFWS = United States Fish and Wildlife Service

Sources:
City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.
California Invasive Plant Council (Cal-IPC). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Website: https://wildlife.ca.gov/Conservation/Survey-Protocols. Accessed March 26, 2026.
Compiled by FCS, 2026.

As explained in Table 3.4-9, the Vista Ranch Development would be fully consistent with relevant General Plan policies related to biological resources with the implementation of MM BIO-1e through MM BIO-1j, MM BIO-1l through MM BIO-1n, and MM BIO-3c. Therefore, impacts would be less than significant with mitigation incorporated.

Local Ordinances

As discussed in Section 3.4.3, Regulatory Framework, above, the only local ordinance relevant to biological resources is the City's Tree Protection Ordinance, which requires permit authorization for removal of certain trees (e.g., heritage trees and tree plantings required as Conditions of Approval [COAs] under a development or building permit) and can also require replacement plantings.

No heritage trees have been identified within MP Area 1; none of the extant trees in MP Area 1 were planted as a result of prior development or building approvals; and none of the trees are parkway or public property trees. Some of the trees that would need to be removed for development in this area may qualify as trees on developed single-family properties and could thus be exempt from permit requirements under the Tree Protection Ordinance.

However, some of the trees planned for removal may trigger the City's permit requirement based on their size. This would be addressed during the entitlements process, with extensive landscape plantings provided as laid out in the Master Plan, which is subject to City review and approval. This would give the City the opportunity to ensure that Tree Protection Ordinance requirements for permitting and, if applicable, replacement plantings are met. In this context, the Vista Ranch Development is considered consistent with the Tree Protection Ordinance. Therefore, no impacts related to conflict with local ordinances would occur, and no mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

Vista Ranch Development/MP Area 1

Implement MM BIO-1e, MM BIO-1f, MM BIO-1g, MM BIO-1h, MM BIO-1i, MM BIO-1j, MM BIO-1l, MM BIO-1m, MM BIO-1n, and MM BIO-3c.

Level of Significance After Mitigation

Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would have no impact, accordingly, no analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

MP Area 2

At present, no cumulative impact is considered to exist with regard to conflicts with City policies or ordinances protecting biological resources because the City reviews all development proposals for consistency with those policies and ordinances and imposes Conditions of Approval to ensure compliance. Moreover, the mitigation measures identified in this Revised Draft EIR would ensure that the proposed project's implementation in MP Area 2 would not result in a cumulatively considerable contribution to any cumulative impacts. All applicable mitigation measures would be established as Conditions of Approval for future MP Area 2 projects. With such mitigation in place, projects within MP Area 2 would have no potential to contribute to any cumulative impact related to conflict with local ordinances or policies protecting biological resources. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Vista Ranch Development/MP Area 1

At present, as identified above, no cumulative impact is considered to exist with regard to conflicts with City policies or ordinances protecting biological resources because the City reviews all development proposals for consistency with those policies and ordinances and enforces Conditions of Approval to ensure compliance. Moreover, the mitigation measures identified in this Revised Draft EIR would ensure that the proposed project would not result in a cumulatively considerable contribution to any cumulative impacts. Those measures would be established as Conditions of Approval for the Vista Ranch Development and would remain in force for the entirety of the Vista Ranch Development's lifespan. With those measures in place, the Vista Ranch Development would have no potential to contribute to any cumulative impact related to conflict with local ordinances or policies protecting biological resources. No further analysis is warranted, and no additional mitigation is required at the cumulative level.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Local, Regional, or State Habitat Conservation Plan

Impact BIO-6:	**The proposed project would not 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 adopted conservation plan of any kind is currently in place at the federal, State, regional, or local level for any portion of the SOI Expansion Area, including MP Area 1 and MP Area 2. The proposed project would therefore have no potential to result in activities conflicting with such a plan. There would be no impact, and no mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No analysis of this topic at the cumulative level is warranted; see Cumulative Analysis in Section 3.4.4, above.

Level of Cumulative Significance

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

3.5 - Cultural Resources and Tribal Cultural Resources

3.5.1 - Introduction

This section describes the existing cultural and Tribal Cultural Resources (TCRs) setting and potential effects from project construction. The descriptions and analysis in this section are based, in part, on information provided by the Native American Heritage Commission (NAHC), Tribal consultation pursuant to Assembly Bill (AB) 52 and Senate Bill (SB) 18, a records search conducted at the Southern San Joaquin Valley Information Center (SSJVIC), archival research, and a pedestrian survey, which is the professional protocol used to identify cultural resources. The results are presented in the Cultural Resources Inventory Report: Triangle Property Project, prepared by ECORP Consulting, Inc., (ECORP) in January 2023 for the Vista Ranch Development, which is included in the confidential Appendix F. The applicable regulatory framework is also discussed below. In addition, recommendations provided in the Cultural Resources Inventory Report pertaining to feasible mitigation of identified potential significant impacts to cultural and TCRs are also addressed in this section.

The following public comment was received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to cultural resources and TCRs.

- The NAHC outlined standard procedures for SB 18 and AB 52. (pp. 3.5-8 to 3.5-10)

3.5.2 - Environmental Setting

Overview

The term “cultural resources” encompasses historical resources, archaeological resources, TCRs, and burial sites, which are generally defined as follows:

- **Historical Resources:** Historical resources are defined in Section 15064.5 of the California Code of Regulations (CCR) as meeting any of three definitions. First, they might be officially listed, or eligible to be listed, in the California Register of Historical Resources (CRHR), or included in a local list, or identified in a survey that meets State standards. Additionally, the Lead Agency may decide that “any object, building, structure, site, area, place, record, or manuscript” is significant. Historical resources are distinguished from historic era resources in that, unlike the latter, they can be from any culture or time period.
- **Archaeological Resources:** Archaeology is the study of artifacts and material culture with the aim of understanding human activities and cultures in the past. Archaeological resources may be associated with pre-contact Indigenous cultures as well as later historic periods and may be either unique or non-unique archaeological resources, as defined in Section 21083.2 of the Public Resources Code (PRC).

- **Tribal Cultural Resources:** TCRs include sites, features, places, or objects that are of cultural value to one or more California Native American Tribes, as defined in Section 21074 of the PRC.
- **Burial Sites and Cemeteries:** Burial sites are formal or informal locations where human remains are interred, as defined in Section 5097.98 of the PRC or Section 7000, *et seq*., of the California Health and Safety Code.

Under the California Environmental Quality Act (CEQA), a substantial adverse change in the significance of a historical resource, unique archaeological resource, TCR, or human remains would constitute a significant effect on the environment.

Cultural Setting

Following is a brief overview of the relevant prehistory, ethnography, and historic background, providing context in which to understand the background and relevance of sites found in the general project vicinity. This section is not intended to be a comprehensive review of the current academic resources available; rather, it serves as a brief, general overview. Unless otherwise stated, information contained in this section is drawn from the Cultural Resources Inventory Report: Triangle Property Project, prepared by ECORP. Further details can be found in ethnographic studies, mission records, and major published sources in the Cultural Resources Inventory Report.

Native American History

The San Joaquin Valley and adjacent Sierra Nevada foothills and Coast Range have a long and complex cultural history with distinct regional patterns that extend back more than 11,000 years. The first generally agreed upon evidence for the presence of pre-contact peoples in the region is represented by the distinctive basally thinned and fluted projectile points found on the margins of extinct lakes in the San Joaquin Valley. These projectiles, often compared to Clovis points, have been found at three localities in the San Joaquin Valley, including along the Pleistocene shorelines of former Tulare Lake. Based on evidence from these sites and other well-dated contexts elsewhere, the Paleo-Indian hunters who used these spear points existed during a narrow time range of 11,550 to 8,550 BP.

The Lower Archaic (8,550 to 5,550 BP) is characterized by apparent contrasts in economy. Archaeological deposits that date to this period on the valley floor frequently include only large-stemmed spear points, suggesting an emphasis on large game, such as artiodactyls.

About 8,000 years ago, many California cultures shifted the main focus of their subsistence strategies from hunting to nut and seed gathering, as evidenced by the increase in food-grinding implements found in archaeological sites dating to this period. This cultural pattern is best known for Southern California, where it has been termed the Millingstone Horizon. Radiocarbon dates associated with this period vary between 8,000 and 2,000 BP, although most cluster in the 6,000 to 4,000 BP range.

In Central California, late Middle Archaic settlements focused on river courses on the valley floor. Again, climate change apparently influenced this shift, with warmer, drier conditions prevailing throughout California. The shorelines of many lakes, including Tulare Lake, contracted substantially.

A return to colder and wetter conditions marked the Upper Archaic in Central California (2,500 to 1,000 BP). In the Central Valley, archaeological evidence of social stratification and craft specialization is indicated by well-made artifacts such as charmstones and beads, often found as mortuary items. The period between approximately 1,000 BP and European-American contact is referred to as the Emergent Period. The Emergent Period is marked by the introduction of bow-and-arrow technology, which replaced the dart and atlatl at about 1,100 to 800 BP. In the San Joaquin region, villages and small residential sites developed along the many stream courses in the lower foothills and along the river channels and sloughs of the valley floor.

By the time that Europeans arrived in the late eighteenth century, the predominant Native American group occupying the region was the Penutian-speaking Yokuts. The Yokuts (meaning person or people), Penutian/Yokutsan speakers, were divided into three distinct groups: the Northern Valley Yokuts, the Southern Valley Yokuts, and the Foothills Yokuts. Of the three groups, the Southern Valley Yokuts territory encompasses the project area. The southern San Joaquin Valley was originally covered by sloughs and marshes surrounding three shallow lakes: Tulare, Buena Vista, and Kern. The lakes were fed by rivers coming from the Sierras, such as the Kern River.

Fresno County

Historic Background

Fresno County was established in 1856 from parts of Mariposa, Merced, and Tulare counties, named after the ash trees along the San Joaquin River. The City of Fresno emerged in 1872 as a railroad town, built by the Central Pacific Railroad on barren land 10 miles south of the river. The arrival of rail service attracted ranchers and merchants, quickly transforming Fresno into a bustling hub with businesses and essential services. By 1874, it became the county seat, and innovations like a steam-powered well helped sustain its growth. By 1890, Fresno's population had surpassed 10,000, driven by its strategic location and expanding infrastructure.

Agricultural development played a key role in Fresno County's growth. Initially dominated by open-range grazing and wheat farming, the region saw a transformation when Moses J. Church introduced irrigation from the Kings River in 1870. Partnering with landowners, Church helped form the Fresno Canal and Irrigation Company, which enabled the creation of colonies like the Central California Colony—20-acre irrigated farms that attracted settlers and became centers for raisin grape production. By the 1890s, irrigation canals supported numerous colonies surrounding Fresno, blurring boundaries between town and countryside. This agricultural boom fueled a population surge, with Fresno County growing from 9,500 to 32,000 residents between 1880 and 1890.

Flood Control on Big Dry Creek

Lack of flood control along Big Dry Creek may have deterred settlers. In March 1938, Big Dry Creek and its four tributaries, Little Dry, Dog, Redbank, and Fancher creeks, overflowed their banks after heavy rains. Ranches west of Clovis flooded, destroying orchards and vineyards. Fresno's Fig

Garden neighborhood also became inundated; many of its adobe homes “crumpled like cubes of sugar.” In 1948, the United States Army Corps of Engineers (USACE) built the Big Dry Creek Project immediately east of the project area, on land that historically encompassed much of the Mississippi Settlement. The Big Dry Creek Project regulated flows on Big Dry Creek, mitigating the risk of flooding downstream. In March 1955, USACE crews completed remedial work to control hillside erosion at the dam. Only 7 months later, the Christmas flood of 1955 occurred and put their work to the test. Analysts estimated that the Big Dry Creek Project saved Fresno County property owners $3,000,000 in damages. In 1993, Fresno Metropolitan Flood Control District (FMFCD) crews elevated the dam crest 7.2 feet to increase the reservoir’s storage capacity. By the late twentieth century, however, the area along Big Dry Creek in the project area remained only sparsely settled with a handful of home ranches.

Architectural Context: The Home Ranch

The concept of the "home ranch" has been central to livestock operations in the western United States for over a century, especially in California, where it emerged following the no-fence laws of the 1870s. These laws ended free-range grazing and required ranchers to fence their own land, leading to the development of self-contained ranches that included family residences and outbuildings. Unlike intensive farming, which could support families on small plots, ranching required large tracts of land—often 40 acres or more—to sustain cattle and sheep. Home ranches were typically located near water sources and were designed to be flexible, allowing ranchers to expand or sell portions as needed.

At the heart of each home ranch was the headquarters, usually situated on high ground near a county road. The main house resembled typical town dwellings and was surrounded by structures essential to ranching, such as barns, corrals, stables, and housing for workers. Additional features included water towers, windmills, repair shops, and storage sheds, with silos and chicken coops also common. Because of California’s mild winters, elaborate animal shelters were often unnecessary, and many ranchers opted for minimal or no shelter at all. This practical and adaptable layout helped define the enduring structure and function of the western home ranch.

Architectural Context: Public Roads

During the early to mid-nineteenth century, as the United States expanded westward, Congress tasked Army engineers and later federal railroad surveyors with creating a network of wagon roads to connect military outposts. These roads guided emigrants and freighters to California, often following paths originally established by Native Americans. Expeditions like those of de Anza, Portola, and Fremont relied on Native guides, and Spanish and American settlers built roads that eventually replaced Indigenous footpaths. However, by the late 1800s, these pioneer roads were overshadowed by railroads and fell into disrepair. A renewed interest in road building emerged around 1890, driven by farmers, ranchers, and bicyclists who launched “good roads” campaigns, prompting the federal government to establish the Office of Road Inquiry to explore better construction methods.

California’s wagon roads were notoriously dusty in summer and muddy in winter, prompting innovations such as plank, gravel, and macadam roads and eventually asphalt surfaces by the 1890s. County governments initially managed road grading and paving, prioritizing routes to towns, schools,

and production sites. Many rural roads followed section lines from the Public Land Survey System, with landowners donating strips of land for road development. After 1910, the rise of automobiles and suburban growth led planners to classify roads by traffic volume—residential, collector, arterial, and highways. As cities expanded, rural roads were transformed into suburban streets, often lined with shopping centers and housing developments, reflecting the changing landscape of California.

3.5.3 - Methodology

Records Searches and Pedestrian Survey to Identify Existing Cultural Resources

The information in this section is based on the Cultural Resources Inventory Report: Triangle Property Project, prepared for Master Plan (MP) Area 1 by ECORP in January 2023. The Cultural Resources Inventory Report used the methods below to analyze the potential impacts of the Vista Ranch Development.

Southern San Joaquin Valley Information Center

On July 29, 2022, a records search request for MP Area 1 and its 0.5-mile radius was submitted to the SSJVIC located at California State University, Bakersfield (SSJVIC search #22-303). In addition to the SSJVIC record search, the Built Environment Resource Directory (BERD), the National Register Information System, California Historical Landmarks, California Points of Historical Interest, Directory of Properties in the Historical Resources Inventory, California Department of Transportation (Caltrans) Local Bridge Survey, Caltrans State Bridge Survey, Historic Spots in California, RealQuest Property Search, and historic General Land Office (GLO) land patent records were also reviewed.

Native American Heritage Commission Record Search

On July 29, 2022, a request was submitted to the NAHC to conduct a search of the Sacred Lands File (SLF) for MP Area 1 and a 0.5-mile radius. This search was intended to determine whether the California Native American Tribes within MP Area 1 and surrounding area have recorded Sacred Lands, because the SLF is populated by members of the Native American community with knowledge about the locations of TCRs. The results of the SLF search failed to indicate the presence of Native American cultural resources in MP Area 1 and a 0.5-mile radius.

Cultural Resources Pedestrian Survey

An intensive pedestrian survey of MP Area 1 was conducted from August 15–19, 2022, under the guidance of the Secretary of the Interior's Standards for the Identification of Historic Properties, using 15-meter transects.

Ten architectural resources and one pre-contact resource were identified within the MP Area 1 boundaries.

Historic Architectural Resources

- **TRI-001-S** is the Big Dry Creek Project in Fresno County. The resource consists of a reservoir on Big Dry Creek with a storage capacity of 30,200 acre-feet. The creek is impounded by a 2.92-mile, 33-foot-tall earthen flood detention dam. The reservoir is drained by a 29.5-foot-

wide, 3.5-foot-deep, 2,960-foot-long earthen drainage canal that flows diagonally through MP Area 1 to the Big Dry Creek channel. An 11-foot-wide earthen levee road parallels the canal on its northwestern banks.

- **TRI-003-S** is a segment of East Perrin Avenue (historically called Friant Road) in Fresno County. It is a 20-foot-wide, 3,250-foot-long, two-lane rural section line road paved with asphalt.
- **TRI-005-S** is a segment of East Behymer Avenue in Fresno County. It is a 20-foot-wide, 4,830-foot-long, two-lane rural section line road paved with asphalt.
- **TRI-006-S** is a segment of East Shepherd Avenue in Fresno County. It is a 43-foot-wide, 2-mile-long, three- and four-lane suburban arterial and section line road paved with asphalt.
- **TRI-007-S** is a segment of North Fowler Avenue in Fresno County. It is a 20-foot-wide, 1-mile-long, two-lane rural collector and section line road paved with asphalt.
- **TRI-009-S** is a farm/ranch property located at 6110 and 6120 East Shepherd Avenue. It consists of Building A (main house), Building B (barn), Building C (secondary house), and Building D (shed). Building A is a single-story Craftsman-style house built circa 1920. Building B is a single-story monitor barn built circa 1920. The barn is rectangular in plan and has metal roofing. Building C is a single-story ranch-style house built circa 1955. Building D is a single-story shed built circa 1960. Rectangular in plan, the shed has a side-gable roof with metal roofing.
- **TRI-011-S** is a farm/ranch property located at 6374 East Shepherd Avenue. It consists of Building A (main house); Building B (garage); Building D (secondary house); and buildings C, E, F, G, H, I, and J (farm/ranch buildings). Building A is a single-story Minimal Traditional-style house built circa 1940. Building D is a single-story Minimal Traditional-style house built circa 1945. Buildings C, E, F, G, H, I, and J are twentieth-century wood frame farm/ranch buildings that collectively exhibit an advanced state of disrepair. None remain fit for human or animal habitation.
- **TRI-016-S** is an Aermotor 702 windmill mounted on a steel tower with an associated groundwater pump. The windmill tail is marked “THE/ AERMOTOR/ CHICAGO/ [large C and small circle inside the C].” The structure measures approximately 30 feet tall and 6 feet across, with 20-foot-long metal blades.
- **TRI-017-S** is a segment of North Temperance Avenue in Fresno County. It is a 20-foot-wide, 1,230-foot-long, two-lane rural section line road. It remains unpaved with no further improvements.
- **TRI-019-S** is a farm/ranch property located at 9255 North Temperance Road. It consists of Building A (main house) and Building B (shed). Building A is a single-story ranch-style house built circa 1955.

The resources were evaluated using the National Register of Historic Places (NRHP) and CRHR eligibility criteria and found that none meet the criteria with sufficient integrity to be considered eligible

for the NRHP or CRHR. These resources are not located on any local registry and are not Historical Resources as defined by state law.

Archaeological Resources

No known archaeological sites are located within the MP Area 1 boundaries. One isolate was recorded:

- **TRI-015-I** is an isolated pre-contact basalt tertiary flake measuring less than 3 centimeters. An Archaeologist observed the isolated flake on the ground and conducted a thorough investigation of the surrounding area within 5 meters in each direction with 100 percent coverage but did not observe additional artifacts. There were no rodent burrows or surface disturbances in the immediate area that might otherwise suggest that the flake was moved to the surface through bioturbation.

Isolates do not individually contribute to the broad patterns of history because they cannot be connected to a particular event or individuals, do not possess high artistic value, and do not provide important information in history or prehistory. The resource was evaluated using the NRHP and CRHR eligibility criteria and found that it does not meet the criteria with sufficient integrity to be considered eligible for the NRHP or CRHR. This isolate is neither a historical resource nor a unique archaeological resource as defined by State law.

Dedicated Cemeteries

The cultural resources survey and inventory failed to yield any indication of dedicated cemeteries within the project area.

Tribal Consultation to Identify Tribal Cultural Resources

AB 52 Consultation

On March 14, 2025, the City sent project notification letters to the following California Native American Tribes, which had previously submitted general notification requests in writing pursuant to 21080.3.1(d) of the PRC.

- Table Mountain Rancheria
- Santa Rosa Rancheria Tachi Tribe
- Torres Martinez Desert Cahuilla Indians

Each recipient was provided a brief description of the proposed project and its location, the Lead Agency's contact information, and a notification that the Tribe has 30 days to request consultation, pursuant to PRC Section 21080.3.1(d). Multiple attempts were made to reach nonresponsive Tribes by telephone and email to ensure that the Tribe was in receipt of the letter and understood the opportunity to consult. The 30-day response period concluded on April 13, 2025. As a result of the initial notification letters, the City received the following responses.

Table Mountain Rancheria

The Table Mountain Rancheria responded on March 25, 2025, stating they received the original request for consultation from the City on December 27, 2023, and again on March 14, 2025. On December 27, 2023, the Tribe requested to be a consulting party and requested information. The Tribe stated they did not receive a response; however, the City did reach out to the Tribe multiple times via phone and email (January 9, 2023, January 26, 2023, and February 5, 2023) and received no response. On March 25, 2025, the City initiated consultation by providing the requested materials to the Tribe, as well as emails from 2023. The Tribe did not provide comments or information on TCRs to the City after receiving the requested information. Therefore, the City considered consultation concluded on August 1, 2025, pursuant to PRC Section 21082.3(d)(2), due to failure of the Tribe to engage in consultation after requesting it.

Santa Rosa Rancheria Tachi Tribe and Torres Martinez Desert Cahuilla Indians

The Santa Rosa Rancheria Tachi Tribe and Torres Martinez Desert Cahuilla Indians did not request consultation, and on August 1, 2025, the City considered consultation concluded pursuant to PRC Section 21082.3(d)(3).

Because the City initiated consultation with all AB 52 Tribes that requested it, the threshold for release of the CEQA document for public review in PRC Section 21080.3.1(b) has been met. In addition, because the City concluded consultation with all AB 52 Tribes in good faith, the threshold for the certification of an EIR in PRC Section 21082.3(d) has been met. Therefore, the City has completed all required consultation procedures under AB 52 for the proposed project.

Because all Tribes either failed to request consultation or failed to engage in the consultation process, this Revised Draft EIR draws from other lines of evidence to address the CEQA checklist questions for TCRs. Such other lines of evidence include ethnographic and records search information and the results of archaeological surveys.

SB 18 Consultation

Under SB 18, on March 14, 2025, the City sent project notification letters to the following California Native American Tribes. Each recipient was provided a brief description of the proposed project and its location, the Lead Agency's contact information, and a notification that the Tribe has 90 days to request consultation, pursuant to Government Code Section 65352.3(a)(2). The 90-day response period concluded on June 12, 2025.

- Amah Mutsun Tribal Band
- Kitanemuk and Yowlumne Tejon Indians
- Northern Valley Yokut/Ohlone Tribe
- Picayune Rancheria of the Chukchansi Indians
- Table Mountain Rancheria
- Tule River Indian Tribe
- Wuksachi Indian Tribe/Eshom Valley Band

As a result of the notification letters, the City received one response.

Table Mountain Rancheria

The Table Mountain Rancheria responded on March 25, 2025, stating they received the original request for consultation from the City on December 27, 2023, and again on March 14, 2025. On December 27, 2023, the Tribe requested to be a consulting party and requested information. The Tribe stated they did not receive a response; however, the City did reach out to the Tribe multiple times via phone and email (January 9, 2023, January 26, 2023, and February 5, 2023) and received no response. On March 25, 2025, the City initiated consultation by providing the requested materials to the Tribe, as well as emails from 2023. The Tribe did not provide comments or information on TCRs to the City after receiving the requested information. Therefore, the City considered consultation concluded on August 1, 2025, pursuant to PRC Section 21082.3(d)(2), due to failure of the Tribe to engage in consultation after requesting it.

Amah Mutsun Tribal Band, Kitanemuk and Yowlumne Tejon Indians, Northern Valley Yokut/Ohlone Tribe, Picayune Rancheria of the Chukchansi Indians, and Tule River Indian Tribe

The Amah Mutsun Tribal Band, Kitanemuk and Yowlumne Tejon Indians, Northern Valley Yokut/Ohlone Tribe, Picayune Rancheria of the Chukchansi Indians, and Tule River Indian Tribe did not request consultation, and on August 1, 2025, the City concluded consultation pursuant to the 2005 Supplement to General Plan Guidelines for Tribal Consultation.

In compliance with Sections 65352(a)(11) and 65092(a) of the California Government Code, the City will notify each California Native American Tribe listed by the NAHC and with traditional lands within the City's jurisdiction at least 45 days before the City Council hearing to allow time for final comments. A second notice will be sent 10 days prior to the hearing as a follow-up.

3.5.4 - Regulatory Framework

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA), as amended, established the NRHP, which contains an inventory of the nation's significant prehistoric and historic properties. Under 36 Code of Federal Regulations 60, a property is recommended for possible inclusion on the NRHP if it is at least 50 years old, has integrity, and meets one of the following criteria:

- It is associated with significant events in history, or broad patterns of events.
- It is associated with significant people in the past.
- It embodies the distinctive characteristics of an architectural type, period, or method of construction; or it is the work of a master or possesses high artistic value; or it represents a significant and distinguishable entity whose components may lack individual distinction.
- It has yielded, or may yield, information important in history or prehistory.

Certain types of properties are usually excluded from consideration for listing in the NRHP, but they can be considered if they meet special requirements in addition to meeting the criteria listed above. Such properties include religious sites, relocated properties, graves and cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) amended the Antiquities Act of 1906 (16 United States Code [USC] 431–433) and set a broad policy that archaeological resources are important to the nation and should be protected and required special permits before the excavation or removal of archaeological resources from public or Indian lands. The purpose of ARPA was to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites that are on public lands and Indian lands and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data that were obtained before October 31, 1979.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) established federal policy to protect and preserve the inherent rights of freedom for Native groups to believe, express, and exercise their traditional religions. These rights include but are not limited to access to sites, use and possession of sacred objects, and freedom to worship through ceremonials and traditional rites.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act of 1990 sets provisions for the intentional removal and inadvertent discovery of human remains and other cultural items from federal and Tribal lands. It clarifies the ownership of human remains and sets forth a process for repatriation of human remains and associated funerary objects and sacred religious objects to the Native American groups claiming to be lineal descendants or culturally affiliated with the remains or objects. It requires any federally funded institution housing Native American Remains or artifacts to compile an inventory of all cultural items within the museum or with its agency and to provide a summary to any Native American Tribe claiming affiliation.

State

CEQA Guidelines Section 15064.5(a)—CEQA Definition of Historical Resources

CEQA Guidelines Section 15064.5(a), in Title 14 of the CCR, defines a “historical resource” as:

(1) A resource listed in or determined to be eligible by the State Historical Resources Commission for listing in, the California Register of Historical Resources.

(2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such

resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be a historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.

Therefore, under CEQA, even if a resource is not included on any local, State, or federal register or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the CRHR.

Archaeological and historical sites are protected pursuant to a wide variety of State policies, laws and regulations, as enumerated in the PRC Section 5024.1. Cultural resources are recognized as nonrenewable resources and receive additional protection under the PRC and CEQA.

Public Resources Code Section 5024.1 and CEQA Guidelines Section 15064.5(a)—Definition of a Historical Resource

PRC Section 5024.1 and CEQA Guidelines Section 15064.5(a), in Title 14 of the CCR, define a "historical resource" as a resource that either:

(1) Is listed in or determined to be eligible by the State Historical Resources Commission for listing in the CRHR;

(2) Is included in a local register of historical resources as defined in Section 5020.1(k) of the PRC; or

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR including the following:

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
b. Is associated with the lives of persons important in our past;
c. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
d. Has yielded, or may be likely to yield, information important in prehistory or history.

CEQA Guidelines Section 15064.5(a)(3)—California Register of Historical Resources Criteria

As defined by CEQA Guidelines, Section 15064.5(a)(3) (A–D), a resource shall be considered historically significant if the resource meets the criteria for listing on the CRHR. The CRHR and many local preservation ordinances have employed the criteria for eligibility to the NRHP as a model (see criteria described above under the description of the NHPA), since the NHPA provides the highest standard for evaluating the significance of historical resources. A resource that meets NRHP criteria is clearly significant. In addition, a resource that does not meet NRHP standards may still be considered historically significant at a local or State level.

CEQA Guidelines Section 15064.5(c)—Effects on Archaeological Resources

CEQA Guidelines state that a resource need not be listed on any register to be found historically significant. CEQA Guidelines direct lead agencies to evaluate archaeological sites to determine whether they meet the criteria for listing in the CRHR. If an archaeological site is a historical resource, in that it is listed or eligible for listing in the CRHR, potential adverse impacts to it must be considered. If an archaeological site is considered not to be a historical resource but meets the definition of a "unique archaeological resource" as defined in PRC Section 21083.2, then it would be treated in accordance with the provisions of that section.

CEQA Guidelines Section 15064.5(d)—Effects on Human Remains

- Native American human remains and associated burial items may be significant to descendant communities and/or may be scientifically important for their informational value. They may be significant to descendant communities for patrimonial, cultural, lineage, and religious reasons. Human remains may also be important to the scientific community, such as prehistorians, epidemiologists, and physical anthropologists. The specific stake of some descendant groups in ancestral burials is a matter of law for some groups, such as Native Americans (CEQA Guidelines § 15064.5(d); PRC § 5097.98). CEQA and other State laws and regulations regarding Native American human remains provide the following procedural requirements to assist in avoiding potential adverse effects on human remains within the contexts of their value to both descendant communities and the scientific community. When an initial study identifies the existence or probable likelihood that a project would affect Native American human remains, the lead agency is to contact and work with the appropriate Native American representatives identified through the NAHC to develop an agreement for the treatment and disposal of the human remains and any associated burial items (CEQA Guidelines § 15064.5(d); PRC § 5097.98).

- If human remains are accidentally discovered, the County Coroner must be contacted. If the County Coroner determines that the human remains are Native American, the Coroner must contact the NAHC within 24 hours. The NAHC must identify the Most Likely Descendant (MLD) to provide for the opportunity to make recommendations for the treatment and disposal of the human remains and associated burial items (CEQA Guidelines § 15064.5(e)).
- If the NAHC is unable to identify a MLD, the MLD fails to make recommendations within 24 hours of notification, or the project applicant rejects the recommendations of the MLD, the Native American human remains and associated burial items must be reburied in a location not subject to future disturbance on the property (CEQA Guidelines § 15064.5(e)).
- If potentially affected human remains or a burial site may have scientific significance, whether or not it has significance to Native Americans or other descendant communities, then under CEQA, the appropriate mitigation of effect may require the recovery of the scientific information of the remains/burial through identification, evaluation, data recovery, analysis, and interpretation (CEQA Guidelines § 15064.5(c)).

Health and Safety Code Section 7050.5

Section 7050.5 of the Health and Safety Code sets forth provisions related to the treatment of human remains. As the code states, “every person who knowingly mutilates or disinters, wantonly disturbs, or willfully removes any human remains in or from any location other than a dedicated cemetery without authority of law is guilty of a misdemeanor” except under circumstances as provided in Section 5097.99 of the Public Resource Code. The regulations also provide guidelines for the treatment of human remains found in locations other than a dedicated cemetery including responsibilities of the Coroner.

Public Resources Code Section 5097.98

Section 5097.98 provides protocol for the discovery of human remains. It states that “whenever the commission receives notification of a discovery of Native American human remains from a County Coroner pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code, it shall immediately notify persons believed to be most likely descended from the deceased Native American.” It also sets forth provisions for descendants’ preferences for treatment of the human remains and what should be done if the commission is unable to identify a descendant.

Public Resources Code Section 5097.91—Native American Heritage Commission

Section 5097.91 of the PRC established the NAHC, whose duties include the inventory of places of religious or social significance to Native Americans and the identification of known graves and cemeteries of Native Americans on private lands. Under Section 5097.91 of the PRC, a State policy of noninterference with the free expression or exercise of Native American religion was articulated along with a prohibition of severe or irreparable damage to Native American sanctified cemeteries, places of worship, religious or ceremonial sites or sacred shrines located on public property. Section 5097.98 of the PRC specifies a protocol to be followed when the NAHC receives notification of a discovery of Native American human remains from a County Coroner. Section 5097.5 defines the

unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands as a misdemeanor.

California Senate Bill 18—Protection of Tribal Cultural Places

California Senate Bill (SB) 18 (California Government Code § 65352.3) incorporates the protection of California traditional Tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American Tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. SB 18 requires public notice to be sent to Tribes listed on the NAHC SB 18 Tribal Consultation list within the geographical areas affected by the proposed changes. Tribes must respond to a local government notice within 90 days (unless a shorter time frame has been agreed upon by the Tribe), indicating whether or not they want to consult with the local government. Consultations are for the purpose of preserving or mitigating impacts to places, features, and objects described in Sections 5097.9 and 5097.993 of the PRC that may be affected by the proposed adoption or amendment to a general or specific plan.

California Assembly Bill 52—Effects on Tribal Cultural Resources

AB 52 was signed into law on September 25, 2014, and provides that any public or private "project with an effect that may cause a substantial adverse change in the significance of a Tribal cultural resource is a project that may have a significant effect on the environment." TCRs include "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the CRHR or included in a local register of historical resources." Under prior law, TCRs were typically addressed under the umbrella of "cultural resources," as discussed above. AB 52 formally added the category of "tribal cultural resources" to CEQA and extends the consultation and confidentiality requirements to all projects as provided for under CEQA, rather than just projects subject to SB 18 as previously discussed.

The parties must consult in good faith, and consultation is deemed concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect on a TCR (if such a significant effect exists); or (2) when a party concludes that mutual agreement cannot be reached. Mitigation measures agreed upon during consultation must be recommended for inclusion in the environmental document. AB 52 also identifies mitigation measures that may be considered to avoid significant impacts if there is no agreement on appropriate mitigation. Recommended measures include:

- Preservation in place.
- Protecting the cultural character and integrity of the resource.
- Protecting the traditional use of the resource.
- Protecting the confidentiality of the resource.
- Permanent conservation easements with culturally appropriate management criteria.

Public Resources Code Section 21074—Effects on Tribal Cultural Resources

AB 52 amended the CEQA statute to identify an additional category of resource to be considered under CEQA called "tribal cultural resources." It added PRC Section 21074, which defines "tribal cultural resources" as follows:

(a) "Tribal cultural resources" are either of the following:
  (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either of the following:
    A) Included or determined to be eligible for inclusion in the CRHR.
    B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
  (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American Tribe.

(b) A cultural landscape that meets the criteria of subdivision (a) is a Tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "non-unique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a Tribal cultural resource if it conforms with the criteria of subdivision (a).

Local

City of Clovis General Plan

The General Plan includes several goals and policies relevant to cultural resources and TCRs. Policies applicable to the proposed project are identified below:

Open Space and Conservation Element

Goal 2 Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

Policy 2.9 **National and State historic resources**: Preserve historical sites and buildings of State or national significance in accordance with the Secretary of Interior Standards for Historic Rehabilitation.

Policy 2.10 **Local historic resources**: Encourage property owners to maintain the historic integrity of the site by (listed in order of preference): preservation, adaptive reuse, or memorialization.

Policy 2.11 **Old Town**: Prioritize the preservation of the historic character and resources of Old Town.

Policy 2.12 **Public education**: Support public education efforts for residents and visitors about the unique historic, natural, and cultural resources in Clovis.

3.5.5 - Approach to Analysis

This evaluation focuses on whether implementation of the proposed project would have potentially significant impacts on historical resources, archaeological resources, human remains, TCRs, or sacred sites.

A project could have a significant impact on a historical resource if construction of the project would significantly impair a resource's eligibility for inclusion in the CRHR or on a local list; thus, this information has been considered, as appropriate, as part of the methodology used in this evaluation. Analysis is based, in part, on information collected from record searches at the SSJVIC, additional archival research, pedestrian surveys, and information from the historic architectural assessment of existing properties more than 45 years in age (if any) located within the MP Area 1 boundaries. If a project would leave an identified cultural resource no longer able to convey its significance, meaning that the resource would no longer be eligible for listing in the CRHR or local registry, then the proposed project's impact would be considered a significant adverse change. Pursuant to CEQA Guidelines Section15126.4(b)(1), if a project adheres to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, then the project's impact "shall generally be considered mitigated below a level of significance and thus is not significant."

A project may have an impact on a unique or non-unique archaeological resource or human remains if construction of the project would physically damage or destroy archaeological data or human remains (including those interred outside of dedicated cemeteries). Analysis is based, in part, on information collected from record searches at the SSJVIC, the additional archival research, and pedestrian surveys.

A project may have an impact on a TCR or a sacred site if the project would physically alter the qualities that make the TCR significant. In accordance with Section 21065 of the CEQA Statute, "project" means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. Effects to cultural resources or TCRs that are not physical are not considered in the CEQA process.

Both direct and indirect effects of project implementation were considered for this analysis. Direct impacts are typically associated with construction and/or ground-disturbing activities, and have the potential to immediately alter, diminish, or destroy all or part of the character and quality of archaeological resources and/or historic architecture, human remains, or eligible TCRs. Indirect impacts are typically associated with post-project implementation conditions that have the potential to alter or diminish the historical setting of a cultural resource (generally historic architecture) by introducing visual intrusions on existing historical structures that are considered undesirable.

Cumulative Analysis

The geographic scope of the cumulative analysis is the City of Clovis because the City provides the smallest geographic boundary of potential significance when cultural resources are evaluated at the local, State, or federal level. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to historical resources, archaeological resources, TCRs, and human remains. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.5.6 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether cultural resources impacts resulting from the implementation of the proposed project would be considered significant if the project would:

a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

c) Disturb any human remains, including those interred outside of dedicated cemeteries.

d) 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 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).

e) 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 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.

3.5.7 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Historical Resources

Impact CUL-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

Impact Analysis

A substantial adverse change in the significance of a historical resource is defined at Section 15064.5(b)(1) of the CEQA Guidelines as the "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired."

Sphere of Influence Expansion and Non-development Area

Expansion of the Sphere of Influence (SOI) does not include any specific development proposals in the Non-development Area. As such, no new development or improvements are proposed or entitled as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would not result in physical development and as such would not alter, interfere with, or impact any known or previously unknown historical resources. Therefore, no impacts to historical resources would occur.

MP Area 2

Development in Master Plan (MP) Area 2 under the proposed project would result in additional residential and nonresidential development that could affect known historical resources or previously unidentified or undesignated resources.

The General Plan includes policies intended to conserve and reduce impacts to historical resources in accordance with the Secretary of the Interior's Standards for Historic Rehabilitation. Required implementation of the General Plan Mitigation Measure (MM) CUL-1a would ensure that future development projects are appropriately reviewed in terms of potential impacts to historical resources following all federal, State, and local regulations prior to approval so that any historical resources would be identified, evaluated, and, if preservation in place is not feasible, mitigated under a subsequent environmental review and approval. Future projects would also be required to comply with MM CUL-1b to manage unanticipated discoveries, thereby reducing the impact to less than significant. Therefore, impacts on historical resources would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Construction

No historical resources were identified in MP Area 1; however, excavations that occur in association with construction of the proposed project could affect previously unknown and unrecorded cultural resources, and these resources may meet the criteria for inclusion in the NRHP/CRHR or be otherwise designated as historical resources. If present, these resources could be impacted by project construction, and, if the impacts would diminish the qualities that made them significant, the resulting damage to the resources would be considered a potentially significant impact. Required implementation of unanticipated discovery measures and treatment procedures in MM CUL-1b would

reduce this to less than significant. Therefore, impacts on historical resources would be less than significant with mitigation incorporated.

Operation

The proposed project would not result in any operational impacts that could cause a significant adverse change to a historical resource. Therefore, no respective operational impacts would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

MM CUL-1a Prior to project approval for all future projects within Master Plan (MP) Area 2 subject to discretionary approval under the California Environmental Quality Act (CEQA), a qualified professional shall conduct a records search and literature review through the California Historical Resources Information System (CHRIS) to identify known historical resources within the project area. If no prior survey exists or if existing data is outdated (more than 10 years old), a qualified Archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards, in coordination with a qualified Architectural Historian, shall conduct a field survey to identify and evaluate potential cultural resources that may be considered significant pursuant to CEQA Guidelines Section 15064.5. If cultural resources are identified, project designs shall be modified to avoid impacts to identified cultural resources. If avoidance is not possible, the City shall require appropriate treatment measures such as recording, relocation, or preservation in place.

MP Area 2 and Vista Ranch Development/MP Area 1

MM CUL-1b If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified Archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology shall be retained to evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional Archaeologist determines that the find does not represent a cultural resource, work may resume immediately with no agency notifications required.
- If the professional Archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the Archaeologist shall immediately notify the Lead Agency (City of Clovis). The Lead Agency shall consult

on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 of the National Historic Preservation Act (NHPA), if applicable. Work may not resume within the no-work radius until the Lead Agency, through consultation as appropriate, determines either: (1) that the site is not a Historical Resource under CEQA or a Historic Property under Section 106; or (2) that the treatment measures have been completed to their satisfaction.

- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (Assembly Bill [AB] 2641). The Archaeologist shall notify the Fresno County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California Public Resources Code (PRC), and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner shall notify the Native American Heritage Commission (NAHC), which then shall designate a Native American Most Likely Descendant (MLD) for the project (PRC § 5097.98). The designated MLD shall have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (PRC § 5097.94). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (PRC § 5097.98). This will also include either recording the site with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the Lead Agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

The geographic scope for evaluating cumulative impacts related to cultural resources is generally localized and site-specific because cultural resources, such as archaeological sites, historical landmarks, or sacred places, are intrinsically tied to specific locations. Accordingly, this cumulative discussion is limited to the SOI Expansion Area and its immediate vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified cultural resources. However, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural resources, including the provisions of Section 15064.5 of the CEQA Guidelines, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the PRC. Compliance with these laws may also require development projects to prepare site-specific project-level analysis to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific cultural resources. Accordingly, because cumulative development would be required to comply with long-term planning documents, and regulatory agency policies (including, but not limited to, evaluation requirements and inadvertent discovery procedures) that reduce impacts to potential cultural resources, cumulative impacts would be less than significant.

Furthermore, development within MP Area 2 would not result in a cumulatively considerable contribution to this less than significant impact because future development projects would be required to comply with all applicable federal, State, and local laws related to historic resources, as well as with MM CUL-1a, which would implement professionally accepted treatment procedures and measures to appropriately recover, preserve, or document the aspects of integrity that may otherwise be lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The pedestrian survey identified 10 historic era architectural resources within the MP Area 1 boundaries. These resources were evaluated to determine their eligibility status to be listed on the NRHP and CRHR. As a result of the evaluation, none of the resources meet the criteria with sufficient integrity to be considered eligible for the NRHP or CRHR, and none are historical resources under CEQA. As the proposed Vista Ranch Development would not impact any existing historical resources, it would not contribute to a cumulative impact. Therefore, cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Archaeological Resources

Impact CUL-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

Impact Analysis

SOI Expansion and Non-development Area

Expansion of the SOI does not include any specific development proposals in the Non-development Area. As such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would not result in physical development and as such would not alter, interfere, or impact any known or previously unknown archaeological resources. Therefore, no impacts to unique or non-unique archaeological resources would occur.

MP Area 2

Development within MP Area 2 may result in private and public improvements that could have significant environmental impacts related to archaeological resources. Therefore, subsequent development under the proposed Master Plan could affect known archaeological resources or previously unidentified or undesignated archaeological resources.

The potential for additional archaeological sites to be present within MP Area 2 exists but varies by location. Prehistoric habitation sites tend to be situated in proximity to creeks and other areas with a reliable water supply. Task-specific sites or resource procurement sites can be situated in almost any environment conducive to human activity. Buried prehistoric archaeological sites tend to be found on Holocene-era landforms, particularly alluvial fans, floodplains, and areas along rivers and streams. As such, within MP Area 2, the areas around water features, like the Big Dry Creek and Big Dry Creek Reservoir, have increased potential for buried prehistoric archaeological resources to be present.

Because development within MP Area 2 could affect archaeological resources, development within MP Area 2 would be required to adhere to MM CUL-1a, which requires that archaeological resources assessments are performed for future development projects and may require additional site-specific or project-specific measures to reduce any potential impacts prior to approval so that any unique or non-unique archaeological sites would be identified, evaluated, and, if preservation in place is not feasible, mitigated under a subsequent environmental review and approval. Future projects would also be required to comply with MM CUL-1b to manage unanticipated discoveries, thereby reducing the impact to less than significant.

Vista Ranch Development/MP Area 1

Construction

The single isolated archaeological resource identified in MP Area 1 does not qualify as a unique archaeological resource. However, excavations that occur in association with construction of the proposed project could affect previously unknown and unrecorded archaeological resources, and these resources may meet the criteria for inclusion in the NRHP/CRHR or be otherwise designated as unique archaeological resources. Archaeological resources can include, but are not limited to, stone,

bone, wood, or shell artifacts or features, including hearths and structural elements. If present, these resources could be impacted by project construction, and, if the impacts would diminish the qualities that made them significant, the resulting damage to the resources would be considered a potentially significant impact.

MM CUL-1b would implement professionally accepted treatment procedures to recover or document the aspects of integrity that would be otherwise lost as a result of impact. This would reduce potential impacts to archaeological resources that may be discovered during project construction. Thus, impacts would be less than significant with mitigation incorporated.

Operation

The proposed project would not result in any operational impacts that could cause a significant adverse change to an archaeological resource. Therefore, no respective operational impacts would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM CUL-1a and MM CUL-1b.

Vista Ranch Development/MP Area 1

Implement MM CUL-1b.

Level of Significance After Mitigation

MP Area 2: Less than significant with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant with mitigation incorporated.

Cumulative Analysis

The geographic scope for evaluating cumulative impacts related to cultural resources is generally localized and site-specific because cultural resources, such as archaeological sites, historical landmarks, or sacred places, are intrinsically tied to specific locations. Accordingly, this cumulative discussion is limited to the SOI Expansion Area and its immediate vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified cultural resources and TCRs. However, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural resources, including the provisions of Section 15064.5 of the CEQA Guidelines, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the PRC. Compliance with these policies may also require development projects to prepare site-specific project-level analysis to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific cultural resources. Accordingly, because cumulative development would be required to comply with long-term planning documents and regulatory agency policies (including, but not limited to, evaluation requirements and inadvertent discovery procedures) that reduce impacts to potential cultural resources, cumulative impacts would be less than significant.

Furthermore, development within MP Area 2 would not result in a cumulatively considerable contribution to this less than significant impact because future development projects would be required to comply with all applicable federal, State, and local laws related to archaeological resources, as well as with MM CUL-1a, which would implement professionally accepted treatment procedures and measures to appropriately recover, preserve, or document the aspects of integrity that may otherwise be lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

Significant impacts to unique archaeological resources have the potential to adversely affect our understanding of the past on multiple levels and are contingent on the category of resource and reasoning behind its significance. In the absence of any known archaeological resources that will be impacted by the proposed project, the appropriate geographic scope for assessing potential cumulative impacts is the immediate project vicinity. This is because the integrity of any given archaeological resource depends on what occurs in the immediate vicinity around that resource, (such as disruption of soils), and the immediate vicinity provides the smallest geographic unit within which significant cumulative impacts spanning multiple projects may occur. For this analysis, the geographic scope is defined as the 0.5-mile SSJVIC records search radius.

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified cultural resources; however, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural resources, including the provisions of Section 15064.5 of the CEQA Guidelines, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the PRC. Compliance with these policies may also require development projects to prepare site-specific project-level analysis to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific cultural resources. Accordingly, because cumulative development would be required to comply with long-term planning documents and regulatory agency policies (including, but not limited to, evaluation requirements and

inadvertent discovery procedures) that reduce impacts to potential cultural resources, cumulative impacts would be less than significant.

Furthermore, the Vista Ranch Development would not result in a cumulatively considerable contribution to this less than significant impact because it would be required to comply with all applicable federal, State, and local laws related to archaeological resources, as well MM CUL-1b, which would implement professionally accepted treatment procedures and measures to appropriately recover, preserve, or document the aspects of integrity that may otherwise be lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Human Remains

Impact CUL-3:	**The proposed project would not disturb human remains, including those interred outside of dedicated cemeteries.**

Impact Analysis

SOI Expansion and Non-development Area

Expansion of the SOI does not include any specific development proposals in the Non-development Area. As such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would not result in physical development and would not alter, interfere, or impact any human remains including those interred outside of dedicated cemeteries. Therefore, no impacts to human remains would occur.

MP Area 2

No dedicated cemeteries or areas containing human remains are known to be within the Master Plan Area. While unlikely, the possibility always exists that construction-related ground disturbance may uncover previously undiscovered human remains. In the unlikely event such a discovery is made, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 must be followed. Implementation of MM CUL-1b, which details inadvertent discovery procedures, would reduce potential impacts to previously undiscovered human remains to a less than significant level with mitigation incorporated.

Vista Ranch Development/MP Area 1

Construction

No dedicated cemeteries or areas containing human remains are known to be within MP Area 1. While unlikely, the possibility always exists that construction-related ground disturbance may uncover

previously undiscovered human remains. In the unlikely event such a discovery is made, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 must be followed. Implementation of MM CUL-1b, which details inadvertent discovery procedures, would reduce potential impacts to previously undiscovered human remains to a less than significant level with mitigation incorporated.

Operation

Impacts related to a project's potential to disturb human remains are limited to initial construction. No direct or indirect operational impacts related to human remains would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

Implement MM CUL-1b.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified human remains or dedicated cemeteries; however, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect human remains, including the provisions of Section 7050.5 of the California Health and Safety Code and Sections 5024.1 and 5097 of the PRC. Compliance with these policies may also require development projects to prepare site-specific project-level analysis to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific human remains. Accordingly, because cumulative development would be required to comply with long-term planning documents and regulatory agency policies (including, but not limited to, evaluation requirements and inadvertent discovery procedures) that reduce impacts to potential human remains, cumulative impacts would be less than significant.

Furthermore, development within MP Area 2 would not result in a cumulatively considerable contribution to this less than significant impact because future development projects would be required to comply with all applicable federal, State, and local laws related to human remains, as well as to implement MM CUL-1b, which would reduce impacts to less than significant levels. Therefore, cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

No human remains or dedicated cemeteries have been identified in the project area. Past, present, and reasonably foreseeable construction activities associated with cumulative projects within this geographic scope may have the potential to encounter undiscovered human remains and/or formal cemeteries, and these cumulative projects would be required to mitigate for impacts through compliance with applicable federal and State laws governing human remains and/or formal cemeteries. Additionally, the implementation of standard construction mitigation measures and best management practices would ensure undiscovered human remains and/or formal cemeteries are not adversely affected by cumulative project-related construction activities, which would prevent the destruction or degradation of potentially significant cultural resources within the geographic scope. Therefore, cumulative impacts would be less than significant.

Furthermore, the Vista Ranch Development would not result in a cumulatively considerable contribution to this less than significant impact because it would be required to comply with all applicable federal, State, and local laws related to human remains, as well as implement MM CUL-1b, which would implement professionally accepted treatment procedures and measures to appropriately recover, preserve, or document the aspects of integrity that may otherwise be lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Listed or Eligible Tribal Cultural Resources

Impact TCR-1:	The proposed project would not 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 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).

Lead Agency Determined Tribal Cultural Resources

Impact TCR-2:	The proposed project would not 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 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.

Impact Analysis

SOI Expansion and Non-development Area

Expansion of the SOI does not include any specific development proposals in the Non-development Area. As such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, approval of the SOI Expansion would not result in physical development and as such would not alter, interfere with, or impact any TCRs or sacred sites. Therefore, no impacts would occur.

MP Area 2

The City sent a request for consultation to three Tribes, including the Santa Rosa Rancheria Tachi Tribe, the Table Mountain Rancheria, and Torres Martinez Desert Cahuilla Indians, pursuant to AB 52 and to various other Tribes pursuant to SB 18 on March 14, 2025, as described above. The City received a response from Table Mountain Rancheria on March 25, 2025, requesting available cultural resources documents, record search results, as well as project plans. The City forwarded these materials to the Tribe on March 25, 2025. No further responses have been received. Because the City did not receive any information from culturally affiliated Tribes about the presence of TCRs or sacred sites, the City reviewed information obtained as part of the cultural resources inventory, including the records search, SLF, and ethnographic information. No TCRs or sacred sites are known to exist in the project area.

It is always possible, however, that subsurface excavation activities may encounter previously undiscovered TCRs that may meet the definition of TCRs in Section 21074 of the PRC. Therefore, any unidentified TCRs could be adversely affected by development under the proposed project and create a potentially significant impact.

Adherence to the provisions under State and federal law and to MM CUL-1a and MM CUL-1b would implement culturally appropriate treatment procedures to recover or document the aspects of integrity that would be otherwise lost as a result of impact. Therefore, potential impacts to existing or undiscovered eligible TCRs within MP Area 2 would be reduced to less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

Construction

The City sent a request for consultation to three Tribes, including the Santa Rosa Rancheria Tachi Tribe, the Table Mountain Rancheria, and Torres Martinez Desert Cahuilla Indians, pursuant to AB 52 and to various other Tribes pursuant to SB 18 on March 14, 2025, as described above. The City received a response from Table Mountain Rancheria on March 25, 2025, requesting available cultural resources documents, record search results, as well as project plans. The City forwarded these materials to the Tribe on March 25, 2025. No further responses have been received. No TCRs or sacred sites are known to exist in the project area.

It is always possible, however, that subsurface excavation activities may encounter previously undiscovered TCRs that may meet the definition of TCRs in Section 21074 of the PRC. Therefore, any unidentified TCRs could be adversely affected by development under the proposed project and create a potentially significant impact.

Implementation of MM CUL-1b requires that, if any previously unidentified TCRs are encountered during construction, all work must halt within a specified radius and a qualified archaeologist must evaluate the find. If the resource is determined to be a TCR, the City would consult with the appropriate Tribe and implement culturally appropriate treatment measures, such as preservation in place, documentation, or other actions consistent with State law and Tribal consultation protocols. These procedures ensure that any significant TCRs are identified, evaluated, and protected or treated appropriately, thereby avoiding or substantially reducing potential adverse impacts. As a result, with MM CUL-1b incorporated, as well as adherence to the provisions under State and federal law, impacts to Tribal Cultural Resources would be reduced to a less than significant level.

Operation

Impacts related to a project's potential to cause a substantial adverse change in the significance of a State-listed or eligible TCR are limited to construction impacts. No respective operational impacts would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.

Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM CUL-1a and MM CUL-1b.

Vista Ranch Development/MP Area 1

Implement MM CUL-1b.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified TCRs. However, development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural and TCRs, including the provisions of SB 18 and AB 52, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the PRC. Compliance with these policies may also require development projects to conduct additional consultation to fulfill CEQA requirements, which could lead to the identification of potential site-specific TCRs. Accordingly, because cumulative development would be required to comply with long-term planning documents and regulatory agency policies (including, but not limited to, evaluation requirements and inadvertent discovery procedures) that reduce impacts to potential TCRs, cumulative impacts would be less than significant.

Furthermore, development within MP Area 2 would not result in a cumulatively considerable contribution to this less than significant impact because future development projects would be required to comply with all applicable federal, State, and local laws related to TCRs, as well with MM CUL-1a and MM CUL-1b, which would implement culturally appropriate treatment procedures to recover or document the aspects of integrity that would be otherwise lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

Significant impacts to TCRs may range from impacts to a resource meeting the CEQA definition of a TCR to impacts to resources identified through consultation between a lead agency and Native American Tribes. As such, the scope and range of potential cumulative impacts to TCRs are highly contingent on the nature of the resource and status of consultation. In the absence of any known

TCRs that would be significantly impacted by the proposed project, the appropriate geographic scope for assessing potential cumulative impacts to TCRs is the project vicinity. This is because any undiscovered TCRs would likely be archaeological in nature, and the immediate project vicinity provides the smallest geographic unit within which significant cumulative impacts spanning multiple projects may occur. Thus, for the purposes of this analysis, the immediate vicinity is defined as the 0.5-mile SSJVIC records search radius.

There are no known TCRs or other archaeological resources within the project area; however, there is always the possibility of previously unknown resources that could be damaged or destroyed during subsurface construction activities associated with cumulative projects. Nevertheless, any such potential cumulative impacts would be required to be mitigated at an individual project-level through compliance with applicable federal, State, and local laws and regulations governing cultural resources, such as adherence to standard conditions of approval that require monitoring of construction sites in proximity to known resources. Therefore, cumulative impacts would be less than significant.

Furthermore, the Vista Ranch Development would not result in a cumulatively considerable contribution to this less than significant impact because it would be required to comply with all applicable federal, State, and local laws related to TCRs, as well as MM CUL-1b, which would implement culturally appropriate treatment procedures to recover or document the aspects of integrity that would be otherwise lost as a result of impact. Therefore, cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.6 - Energy

3.6.1 - Introduction

This section describes the existing energy setting in the project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to energy that could result from implementation of the project. Information in this section is based, in part, on project-specific energy calculation outputs included in Appendix D.

No public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to energy.

3.6.2 - Environmental Setting

The existing setting focuses on regional and local energy consumption, and factors related to the use and availability of energy including infrastructure, capacity, and supply.

Energy Basics

Energy is generally transmitted either in the form of electricity, measured in kilowatts (kW)[1] or megawatts (MW),[2] or natural gas measured in British Thermal Units (BTU) or cubic feet.[3] Fuel, such as gasoline or diesel, is measured in gallons or liters.

Electricity

Electricity is used primarily for lighting, appliances, and other uses associated with the proposed project.

Natural Gas

Natural gas is used primarily for heating, water heating, and cooking purposes and is typically associated with commercial and residential uses.

Fuel

Fuel is used primarily for powering off-road equipment, trucks, and passenger vehicles. The typical fuel types used are diesel and gasoline.

[1] 1 kW = 1.000 watts; A watt is a derived unit of power that measure rate of energy conversion. 1 watt is equivalent to work being done at a rate of 1 joule of energy per second. In electrical terms, 1 watt is the power dissipated by a current of 1 ampere flowing across a resistance of 1 volt.

[2] 1 MW = 1 million watts

[3] A unit for quantity of heat that equals 100,000 British Thermal Units (BTUs). BTU is the quantity of heat required to raise the temperature of 1 pound of liquid water 1°F (degree Fahrenheit) at a constant pressure of 1 atmosphere.

Energy Usage

Energy use in an area is generally distributed across five main energy use sectors:

- **Transportation Sector**: includes vehicles that transport people or goods, including cars, trucks, buses, aircraft, boats and ships.
- **Industrial sector:** includes facilities and equipment used for manufacturing, agriculture, mining and construction.
- **Electric power sector**: primary business is to generate and sell electricity, and in some cases heat, to the other sectors.
- **Residential sector:** includes homes and apartments.
- **Commercial sector:** includes nonresidential uses (such as schools, retail uses, hotels, warehouses, restaurants).

Transportation Sector

Energy use associated with the transportation sector includes the fuel required to transport people or goods, including cars, trucks, buses, aircraft, boats and ships. The proposed project is located in Fresno County, where an estimated 372 million gallons of gasoline and 81 million gallons of diesel fuel were sold in 2022.[4]

Energy use in the transportation sector also includes electricity that can be used to power electric vehicles (EVs) and plug-in hybrid electric vehicles (PHEVs) directly from the power grid. Electricity used to power vehicles is generally provided by the electricity grid and stored in the vehicles' batteries. Fuel cells are being explored to use electricity generated onboard the vehicle to power electric motors. As of August 2024, California had a reported 178,549 public and shared private EV chargers, Fresno County had a reported 1,899 chargers.[5] This includes 426 Public direct current (DC) fast chargers, 882 Public Level 2 Chargers, 8 Shared Private DC fast chargers and 583 Shared Private Level 2 Chargers.[6]

Industrial Sector

Implementation of the proposed project would result in primarily residential, commercial, and recreational uses; however, the light industrial zoning designation is included due to a recently

[4] California Energy Commission (CEC). 2023 Annual Retail Fuel Outlet Report Results CEC-A15 Results and Analysis. Website: https://www.energy.ca.gov/media/3874. Accessed April 21, 2025.

[5] California Energy Commission (CEC). 2025. Electric Vehicle Chargers in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/electric. Accessed April 21, 2025.

[6] California Energy Commission (CEC). 2025. Electric Vehicle Chargers in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/zero-emission-vehicle-and-infrastructure-statistics-collection/electric. Accessed April 21, 2025.

constructed mini-storage facility. Other than this existing facility, which is not a part of the Vista Ranch Development, there are no industrial properties within the Master Plan Area.

Electric Power Sector

Electricity

Electrical service for the SOI Expansion Area in Fresno County is provided by the Pacific Gas and Electric Company (PG&E).

In 2022, Fresno County's residential and commercial sectors utilized a total of 8,384 million kWh (GWh) divided into non-residential usage of 5,213 GWh and residential usage of 3,170 GWh.

Natural Gas

As of 2025, California's natural gas utilities provide service to over 11.2 million gas meters, reflecting a modest increase from previous years. The two largest providers remain Southern California Gas Company (SoCalGas) and PG&E. SoCalGas serves approximately 5.9 million customers, while PG&E serves about 4.4 million.[7] In terms of supply, California's gas utilities forecasted an average daily delivery of 4,600 to 4,800 million cubic feet of natural gas in 2025 under normal weather conditions, a slight decline from 2018 levels. This reduction reflects ongoing efforts to improve energy efficiency and reduce reliance on fossil fuels.[8]

The overwhelming majority of natural gas utility customers in California are residential and small commercial customers, referred to as "core" customers.[9] Larger volume gas customers, such as electric generators and industrial customers, are called "noncore" customers. Although very small in number relative to core customers, noncore customers consume about 65 percent of the natural gas delivered by the State's natural gas utilities while core customers consume about 35 percent.

In 2022, the County's natural gas usage was 319 total millions of therms (211 million therms for non-residential usage and 108 million therms for residential).[10]

PG&E supplies natural gas and electricity in Fresno County. Natural gas is not anticipated for the Vista Ranch Development, although it may be included in Master Plan (MP) Area 2 pending a proposal by the property owners.

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[7] California Public Utilities Commission (CPUC). 2025. Potential and Goals Study. Website: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/energy-efficiency-potential-and-goals-studies/2025-potential-and-goals-study. Accessed June 17, 2025.

[8] California Public Utilities Commission (CPUC). 2025. Potential and Goals Study. Website: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/energy-efficiency-potential-and-goals-studies/2025-potential-and-goals-study. Accessed June 17, 2025.

[9] California Public Utilities Commission (CPUC). 2024. Website: https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california. Accessed April 22, 2025.

[10] California Energy Commission (CEC). 2024. Energy Consumption Database, Gas Consumption by County. Website: https://ecdms.energy.ca.gov/gasbycounty.aspx. Accessed April 22, 2025.

Community-scale Solar Generation

Solar farms, on a community-scale, are more comparable to community gardens. Multiple individuals pool their funds to invest in solar equipment and then share the benefits of the resulting solar energy.

Residential and Commercial Sectors

Residential and commercial buildings require energy to power home devices and equipment, including heating and air conditioning. Electricity and natural gas are the most-used energy sources to power homes. Electricity and natural gas are distributed through the various electric load-serving entities (LSEs) in California. These entities include investor-owned utilities (IOUs), publicly owned LSEs, rural electric cooperatives, community choice aggregators, and electric service providers. These providers are often subject to State-level regulations and standards, including Renewable Portfolio Standards (RPS).

The climate zone in which a building is located can have a significant impact on its energy use. For example, buildings in warmer climates may require more cooling, while buildings in cooler climates may require more heating. Building envelope insulation requirements will change based on climate zone, and by taking into account these climate-related variables and tailoring energy use accordingly, buildings can be constructed to be more energy-efficient and cost-effective while also reducing their impact on the environment. Prescriptive requirements of energy regulations vary according to the climate zone a city is in.

In addition, the proposed project does involve the construction of buildings and associated hardscape and landscaping, and while estimates of construction fuel are not available as a subcategory of the industrial sector, construction fuel is known to be a significant contributor to industrial fuel consumption. The construction industry is a major user of diesel fuel as it is utilized almost exclusively in off-road construction equipment. Diesel is the fuel of choice because it has 12 percent more energy per gallon than gasoline and has fuel properties that prolong engine life making it ideal for heavy-duty vehicle applications. Biodiesel was introduced into California in 2000 and Renewable Diesel was introduced in 2012. Biodiesel is predominantly made from soybean and recycled oils into a unique diesel fuel (it can be blended into transportation fuels but is not a substitute for diesel fuel). Renewable Diesel is predominantly made from animal waste oils and the finished fuel is nearly identical to petroleum-based diesel.[11] Renewable diesel, is a transportation fuel produced from non-petroleum renewable sources—specifically, vegetable oils and animal fats. Its chemical and structural properties of renewable diesel are similar to petroleum-derived (conventional) diesel and can be used as a direct substitute for conventional diesel (up to 100 percent or R100). Blends of renewable diesel and conventional diesel are labeled with an R followed by the percentage (by volume) of the renewable diesel content.[12]

[11] California Energy Commission (CEC). 2024. Diesel Fuel Data, Facts, and Statistics. Website: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/diesel-fuel-data-facts-and-statistics. Accessed April 21, 2025.

[12] California Air Resources Board (ARB). 2024. Fact Sheet: Renewable Diesel Fuel Requirements. Website: https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-renewable-diesel-fuel-requirements. Accessed April 21,2025.

California accounts for nearly all of the renewable diesel consumption in the United States, consuming nearly 40 million barrels of renewable diesel.[13] This is compared to one million barrels in 2011 and 28 million barrels in 2021. California's renewable diesel consumption grew substantially after its Low Carbon Fuel Standard (LCFS) went into effect in 2011.[14] This increase represented a shift away from traditional diesel with clean fuels replacing over 50 percent of the diesel used in the State in the first quarter of 2023.[15]

3.6.3 - Regulatory Framework

Federal

Federal energy regulations were first introduced in 1975 with the Energy Policy and Conservation Act of 1975 in response to the 1973–1974 Arab Oil Embargo to improve the average fuel economy of cars and light trucks in the US and improve the US energy independence. Other subsequent federal rules included the Energy Policy Act of 2005 that introduced numerous energy efficiency standards for appliances (building off the existing Energy Star Program) and The Energy Independence and Security Act of 2007 (which strengthened the vehicular fuel economy standards). The purpose of the federal regulations related to energy are to improve energy efficiency (thereby reducing energy use), reduce energy use, promote renewable energy production, and improve US energy independence.

These regulations set important groundwork and foundation for subsequently promulgated California regulations.

State

Because federal regulations generally preempt state and local regulations, they set the foundation for subsequent state regulations to build upon. The following describes the regulatory framework as it pertains to the energy usage sectors relevant to the proposed project. These regulations are also intended to increase energy efficiency—thereby reducing overall energy use—and promote renewable energy production and use.

Transportation Sector

California adheres to the federal Corporate Average Fuel Economy (CAFE) standards but also has several other State programs that influence emissions and fuel efficiency. These regulations include the following:

- Pavley Regulations and Fuel Efficiency Standards (Assembly Bill [AB] 1493)

[13] United States Energy Information Administration (EIA). 2022. State Energy Data System 2022: Updates by Energy Source. Website: https://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_use_rd.pdf. Accessed August 1, 2025.

[14] United States Energy Information Administration (EIA). 2023. Almost All U.S. Renewable Diesel is Consumed in California; Most Isn't Made There. Website: https://www.eia.gov/todayinenergy/detail.php?id=57180#. Accessed August 1, 2025.

[15] California Air Resources Board (ARB). 2023. Press Release 23-24. Low Carbon Fuel Standard drives shift away from petroleum. August 23. Website: https://ww2.arb.ca.gov/news/first-time-50-california-diesel-fuel-replaced-clean-fuels. Accessed October 20, 2025.

- Low-Emission Vehicle (LEV Program)
- Zero-Emission Vehicle (ZEV Program)
- Truck and Bus Regulations
- California Air Resources Board (ARB) Phase 2 Greenhouse Standards for Medium- and Heavy-duty Vehicles
- Advanced Clean Cars Program
- Advanced Clean Trucks Program
- Heavy-Duty Inspection Maintenance Rule (Clean Truck Check)
- Clean Miles Standard

These greenhouse gas (GHG) or air quality regulations aim to reduce emissions of criteria pollutants, air toxics and GHG emissions and at the same time result in decreases in energy and fuel consumption. However, they are not direct energy regulations or policies. Additionally, while these regulations increase energy efficiency and reduce fuel consumption from vehicles, they are typically not directly applicable to land use development projects but apply to either vehicle/engine manufacture or vehicle maintenance and operation.

The proposed project would be subject to these air quality regulations and measures that influence emissions from vehicles. This would include limits on the idling of commercial motor vehicles and construction equipment. The California Code of Regulations (CCR) Title 13, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling prohibits diesel-fueled commercial vehicles from idling for more than 5 minutes at any given location. The primary goal of this regulation is to reduce public health impacts from diesel emissions, but compliance with the measure also results in energy savings in the form of reduced fuel consumption from unnecessary idling.

Finally, while not specifically an energy regulation, the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375) requires land use projects to meet target reductions of Vehicle Miles Traveled (VMT) to reduce GHG emissions. Because VMT is directly related to fuel consumption and because consistency with the targets is determined on an individual development/project basis, this regulation also serves to reduce energy consumption related to passenger vehicle travel.

Industrial Sector

As previously discussed, land use development projects consume fuel during construction operations (and construction is a subset of the industrial sector, along with manufacturing, mining, and agriculture). Because of energy efficiency requirements, off-road diesel equipment dominates the industry. Provisions in California's In-use Off-road Diesel Fleets Regulation under CCR Title 13 not only provide protection from air pollution but promote the use of newer well-tuned and maintained

equipment and provide regulatory limits on unnecessary idling. These minimize toxic diesel exhaust and result in energy efficiency, decreased fuel use, and avoiding the wasteful use of energy.

Electric Power Sector

The RPS is a regulation applicable to the energy/utility provider designed to increase the use of renewable energy sources for electricity generation. California's RPS was established by SB 350 and subsequently SB 100 and requires 60 percent of electricity to come from renewable sources by 2030 and 100 percent from zero carbon sources by 2045.

The renewable content of the produced electricity is based on the energy mix, or the combination of different energy sources used to meet energy needs in a particular region. It includes both renewable and nonrenewable sources. For example, a typical energy mix might include coal, natural gas, nuclear, hydroelectric, wind, and solar power.

Under the Power Source Disclosure Program, retail electricity providers are required to annually disclose to their retail consumers the mix of sources used to provide electricity service during the previous calendar year. In those instances where a retail supplier offers consumers more than one electricity portfolio, the retail supplier is to provide information specific to each electricity portfolio offered. This information is provided to consumers in the form of Power Content Labels.[16]

Residential and Commercial Sectors

Energy Efficiency in Buildings

CCR Title 24 Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficient technologies and methods. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The 2022 Building Energy Efficiency Standards went into effect on January 1, 2023.

This update to the building code provides crucial steps in the State's progress toward 100 percent clean carbon neutrality by midcentury. The 2022 Energy Code builds on California's technology innovations, encouraging energy-efficient approaches to encourage building decarbonization, emphasizing heat pumps for space heating and water heating. This set of Energy Codes extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combinations with heat pumps to enable California buildings to be responsive to climate change. Buildings whose permit applications are applied for on or after January 1, 2023, must comply with the 2022 Energy Code. The Energy Code includes measures that will reduce energy use in single-family, multi-family, and non-residential buildings. These measures will:

[16] California Energy Commission (CEC). 2025. Website: https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure-program/power-content-label. Accessed April 22, 2025.

- Affect newly constructed buildings by adding new prescriptive and performance standards for electric heat pumps for space conditioning and water heating, as appropriate for the various climate zones in California.
- Require photovoltaic (PV) and battery storage systems for newly constructed multi-family and selected non-residential buildings.
- Electric-readiness is a new mandatory requirement for dwelling unit gas space heating, water heating, cooking, and laundry. Common use areas are exempt from the electric-ready requirement, with the exception of common use area clothes dryers.
- Update efficiency measures for lighting, building envelope, heating, ventilation, and air conditioning (HVAC); and
- Make improvements to reduce the energy loads of certain equipment covered by (i.e., subject to the requirements of) the Energy Code that perform a commercial process that is not related to the occupant needs in the building (such as refrigeration equipment in refrigerated warehouses, or air conditioning for computer equipment in data processing centers).

CCR Title 24, Part 11 (commonly referred to as the CALGreen Code) provides for voluntary energy efficiency provisions designed to support local jurisdictions and other entities aiming to exceed the mandatory energy efficiency requirements set by the Energy Code. These provisions apply to newly constructed buildings as well as additions and alterations to existing buildings. These voluntary measures focus on enhancing resource efficiency, improving building energy system performance, and aligning with broader environmental and public health goals, such as decarbonizing California's economy. They complement the mandatory provisions by offering additional strategies for energy conservation and efficiency.

Energy Efficiency in Appliances

This part of the CCR sets standards for the energy efficiency of appliances sold or offered for sale in California. It covers a wide range of appliances, including refrigerators, air conditioners, and other household and commercial devices. Title 20 ensures that individual appliances for the energy efficiency of appliances sold or offered for sale in California meet specific energy efficiency standards. While Title 24 focuses on the building's overall energy efficiency, Title 20 and federal appliance standards ensure that individual appliances meet specific energy efficiency standards. Title 20 ensures that lighting and appliances being used in new construction meet energy efficiency standards set by the California Energy Commission (CEC).

Residential Building Standards Moratorium (2025–2031)

AB 130, enacted in July 2025, imposes a 6-year moratorium (from June 1, 2025, to June 1, 2031) on the adoption or modification of State and local building standards affecting residential construction, with limited exceptions. During the moratorium, the California Building Standards Commission (CBSC) and local jurisdictions are prohibited from implementing new residential code updates unless they address urgent health and safety concerns or wildfire resilience.

Local

County of Fresno

Electricity services for the proposed project would be provided by PG&E, and the Vista Ranch Development/MP Area 1 is proposed to be 100 percent electric. In 2022, 96 percent of PG&E's electricity was from GHG-free sources, including 50 percent renewable resources. PG&E's power mix included approximately 28 percent solar, 9 percent wind, 6 percent geothermal, 4 percent biomass and biowaste, 3 percent small hydroelectric, and 46 percent large hydro and nuclear power.[17] PG&E would provide sufficient ability to generate electricity to serve the proposed project once operational.

The following local regulations are applicable to the proposed project and would increase energy efficiency, decrease fuel use, and promote renewable energy use or production (beyond regional, State and federal requirements).

City of Clovis General Plan

The City of Clovis General Plan includes several policies that are relevant to an evaluation of the energy efficiency and sustainability of the proposed project. The General Plan policies applicable to the proposed project are identified below.[18]

Air Quality Element

Policy 1.6 **Alternative fuel infrastructure**. Encourage public and private activity and employments centers to incorporate electric charging and alternative fuel stations.

Policy 1.7 **Employment measures.** Encourage employers to provide programs, scheduling options, incentives, and information to reduce vehicle miles traveled by employees.

Policy 2.1 **Regional coordination.** Support regional efforts to reduce air pollution (criteria air pollutants and greenhouse gas emissions) and collaborate with other agencies to improve air quality at the emission source and reduce vehicle miles traveled.

Policy 2.6 **Innovative mitigation**. Encourage innovative mitigation measures to reduce air quality impacts by coordinating with the SJVAPCD [San Joaquin Valley Air Pollution Control District], project applicants, and other interested parties.

Open Space and Conservation Element

Policy 3.5 **Energy and Water Conservation**. Encourage new development and substantial rehabilitation projects to exceed energy and water conservation standards set in the California Building Code.

[17] Pacific Gas and Electric Company (PG&E). 2023. Climate Strategy Report. Website: https://www.pge.com/en/about/newsroom/sustainability-reports/climate-strategy-report.html. Accessed April 22, 2025.

[18] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

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.

Circulation Element

Policy 1.9 **Alternative Fuel Infrastructure.** Support the development of infrastructure for alternative fuel vehicles, including electric vehicle charging stations.

Policy 2.2 **Transportation Demand Management**. Encourage strategies that reduce vehicle trips and fuel consumption, such as carpooling, transit use, and active transportation.

Land Use Element

Policy 1.10 **Mixed-Use and Compact Development.** Promote land use patterns that reduce energy consumption by encouraging walkable, transit-accessible, and mixed-use neighborhoods.

Policy 2.4 **Sustainable Urban Form.** Support development that minimizes energy use through efficient site planning and building orientation.

Public Facilities Element

Policy 4.3 **Municipal Energy Efficiency.** Improve energy efficiency in City-owned facilities and operations through retrofits, audits, and renewable energy adoption.

City of Clovis Municipal Code

The City of Clovis Municipal Code (CMC), Chapter 8.16, SEC. 8.16.101 (Adoption of the California Energy Code), states that the City formally adopts the 2022 California Energy Code for regulating energy conservation standards in residential and non-residential buildings. Any updates by the CBSC are automatically incorporated. In case of conflicting codes, the most restrictive standard applies to ensure maximum safety and efficiency.

City of Clovis Building Permits and Inspections

The City also enforces other codes that indirectly affect energy use:[19]

- **Title 8–Building Regulations:** Covers construction standards, including energy-efficient design.
- **California Green Building Standards Code (CALGreen):** Enforced through local building permit processes.

[19] City of Clovis. 2025. Clovis Building Permits and Inspections. Website: https://cityofclovis.com/planning-and-development/building/. Accessed July 16, 2025.

- **Solar Permit Requirements:** The City has streamlined processes for residential photovoltaic systems, including automated permitting options.

3.6.4 - Methodology

The energy use associated with implementation of the Vista Ranch Development/MP Area 1 is presented below including for electricity and fuel consumption (for vehicles traveling to and from the project) during construction and operation. Energy calculations are included as Appendix D of this Revised Draft EIR analysis.

The energy impacts associated with implementation of Sphere of Influence (SOI) Expansion and MP Area 2 are addressed qualitatively in the impact analysis below.

Construction

Fuel consumption for on-site construction equipment and off-site construction vehicles are calculated using inputs and results from the air quality and GHG analysis in the California Emissions Estimator Model (CalEEMod).

Off-road equipment fuel consumption is based on the mix of construction equipment and duration utilizing the CalEEMod inputs for the following:

- Number of pieces of equipment
- Duration of use (days and hours per day)
- Operating load factor
- Fuel type (gasoline, diesel or electric)

Fuel consumption factors in terms of gallons per hour of diesel for off-road equipment were calculated using a factor of 0.054 gallon per brake horsepower-hour (gal/bhp-hr).[20]

Fuel consumption for worker, vendor and haul construction vehicles are also calculated based on CalEEMod inputs. The fuel consumption rates (miles per gallons [mpg]) were obtained using the ARB Emission Factors mobile source emissions model (EMFAC2025) Web Tool.[21] The rates were based on the county-specific inventory for the initial construction year and calculated for the vehicle categories for each vehicle type in CalEEMod.

Operation

Transportation Sector (Mobile Sources)

Fuel consumption factors for operational mobile sources were calculated based on the VMT and operational fleet for each land use modeled in CalEEMod. The EMFAC WebTool was used to develop

[20] California Air Resources Board (ARB). 2021. Low Emission Diesel (LED) Study: Biodiesel and Renewable Diesel Emissions in Legacy and New Technology Diesel Engines. Accessed April 22, 2025.

[21] California Air Resources Board. (ARB). 2024. On-Road EMFAC. Website: https://ww2.arb.ca.gov/our-work/programs/msei/on-road-emfac. Accessed April 22, 2025.

fuel consumption rates corresponding to the County fleet for the Operational Year modeled in CalEEMod. These up-to-date inventories include electric and conventional vehicle inventory data as well as Compressed Natural Gas (CNG) bus and truck data. Electric usage was characterized as kW-hr/vehicle-mile and fossil fuel usage by miles per gallon. CNG usage is reported in gallons equivalent.

Residential and Commercial Sector–Building Energy

Natural gas (if applicable) and electricity estimates are based on CalEEMod energy calculations and include Title 24 and Non-Title 24 energy based on size, land use and Environmental Defense Fund (EDF) climate zone. CalEEMod energy calculations are based on 2019 Title 24, providing somewhat conservative estimates of building energy use.

Because the Vista Ranch Development/MP Area 1 would be all-electric in design, there would be no natural gas and the natural gas usages was zeroed in CalEEMod. Electrifying the proposed development substitutes electric end uses in place of natural gas end uses. Thus, it is expected that user's building would electrify the most common natural gas end uses–space heating, water heating, and range (i.e., cooktop plus oven). Additional natural gas end uses include dryer, auxiliary heat, pool heat, spa heat, solar water heater with natural gas backup, and miscellaneous. These increased electricity demands are revised to account for the increases by replaced end-use electricity following calculational methods outlined in the California Air Pollution Control Officers Association (CAPCOA) Handbook–Measure E-15 (Require All Electric Development). The detailed energy calculation sheets are included in Appendix D).

3.6.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist to determine whether impacts related to energy are significant environmental effects if the proposed project would:

a) Result in 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.

3.6.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Energy Use

Impact ENER-1: The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres which would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the Northeast Urban Center (NEUC) common public identity. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of the 368-acre Vista Ranch Development/MP Area 1, evaluated below. The remaining 139 acres of the Master Plan Area (MP Area 2) are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR.

Construction Energy Usage

In general, the overall construction schedule and process is already designed to be efficient to avoid excess monetary costs, as it would be reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting, maintaining, and fueling the equipment. Furthermore, MP Area 2 would be required to comply with the ARB In-use Off-road Diesel-fueled Fleets Regulation, which imposes limits on idling and restricts the use of older vehicles. Thus, the construction phase of MP Area 2 would not result in wasteful, inefficient, and unnecessary consumption of energy. In addition, as stated, development within MP Area 2 would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. Therefore, construction-related energy impacts would be less than significant.

Operational Energy Use

Development within MP Area 2 would be required to be designed and constructed in accordance with the CALGreen energy efficiency standards of Title 24 applicable at the time of project application. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24

Lighting Power Density requirements define the maximum wattage of lighting that can be used in a building based on its square footage. Compliance with Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help to reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and would promote energy conservation. In addition, as stated, development within MP Area 2 would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. At the time of development, MP Area 2 would be required to demonstrate that the region would have sufficient electrical generation capacity to serve any development. Therefore, operational-related energy impacts would be less than significant.

In summary, the proposed development within MP Area 2 would not result in wasteful, inefficient, or unnecessary consumptions of energy resources and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Implementation of the Vista Ranch Development/MP Area 1 would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities. Implementation of the Vista Ranch Development/MP Area 1 would utilize energy resources during construction and operation. Energy resources that would be potentially impacted include electricity, natural gas, and petroleum-based fuel supplies and distribution systems. A significant impact would occur if the proposed project would result in the inefficient, wasteful, or unnecessary use of energy.

Construction Energy Usage

The Vista Ranch Development/MP Area 1 construction is expected to be phased over about 10 years. If the construction schedule extends to later years, construction energy usage would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment. Construction of the Vista Ranch Development/MP Area 1 would rely on standard land development and construction techniques as practiced in the San Joaquin Valley/Fresno County region. Initial ground disturbance would require equipment, such as survey gear, mowers, discers, bulldozers, self-loading scrapers, excavators, loaders, skid steers, tractors, backhoes, trenchers, dump trucks, water trucks, semi-trucks, pickup trucks, and other heavy equipment. Site development may also include the use of equipment, such as motor graders, rollers, compactors, road paving machines, and similar equipment. Construction within developed lots would also be conducted with standard equipment and techniques, such as trucks, cranes, forklifts, concrete pumps, and other standard means and methods as determined by the builders. Petroleum-based fuels, such as diesel fuel and gasoline, would be the primary sources of energy for these tasks.

Construction equipment is estimated to consume a total of 1,002,755 gallons of gasoline and diesel fuel over the entire construction duration (Appendix D).

Fuel use associated with construction vehicle trips generated by the Vista Ranch Development/MP Area 1 was also estimated; trips include construction worker trips, haul truck trips for material transport, use of on-site trucks, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to MP Area 1 was based on (1) the projected number of trips the Vista Ranch

Development/MP Area 1 would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB EMFAC2025 mobile source emission model. The specific parameters used to estimate fuel usage are included in Appendix D In total, the Vista Ranch Development/MP Area 1 is estimated to generate an estimated 6,246,630 VMT and 281,803 gallons of combined gasoline and diesel for vehicle travel (including worker, vendor and haul trips) during construction (Appendix D).

In general, the overall construction schedule and process is already designed to be efficient to avoid excess monetary costs, as it would be reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting, maintaining, and fueling the equipment. Therefore, the opportunities for future efficiency gains during construction beyond what are already noted above are limited. Furthermore, the Vista Ranch Development/MP Area 1 would be required to comply with the ARB In-use Off-road Diesel-fueled Fleets Regulation, which imposes limits on idling and restricts the use of older vehicles. Thus, the construction phase of the Vista Ranch Development/MP Area 1 would not result in wasteful, inefficient, and unnecessary consumption of energy. Construction-related energy impacts would be less than significant.

Operation

The Vista Ranch Development/MP Area 1 would consume energy as part of building operations and transportation activities. The energy consumption associated with the Vista Ranch Development/MP Area 1 is summarized in Table 1.

Table 1: Estimated Annual Energy Consumption–Vista Ranch Development/MP Area 1 (Operation)

Energy Consumption Activity	Annual Consumption
Operation Vehicle Fuel Consumption	1,783,741 gallons of gasoline
	396,031 gallons of diesel
	9,717 gallons of compressed natural gas
	12,530,287 kWh of electricity
	43,069 kg hydrogen
Building Energy Consumption	36,502,841 kWh of electricity
Notes: kWh = kilowatt-hour kg = kilograms Vehicle fuel consumption is based on EMFAC2025 emissions inventory. Building energy consumption is based on CalEEMod electricity estimates. Source: Appendix D.	

PG&E has sufficient generation and procurement capacity to meet this demand within the region. According to PG&E's 2022 Integrated Resource Plan and recent filings with the California Energy Commission, the utility is actively expanding its renewable and grid capacity, including battery storage and distributed solar projects.[22] Notably, initiatives like the Energize Fresno program and the Key Energy Storage Project are designed to enhance grid reliability and support future growth in the Fresno area.[23,24] Additionally, PG&E's 2024 Grid Modernization Report details upgrades, like Advanced Distribution Management Systems and Distributed Energy Resources Management Systems, which improve load forecasting, outage response, and integration of renewables.[25]

While programs like Energize Fresno and the Key Energy Storage Project are based in the City of Fresno, they contribute to broader grid improvements across the county, including within the City of Clovis. Furthermore, the General Plan and associated specific plans have accounted for energy demand consistent with regional growth forecasts, and the Vista Ranch Development/MP Area 1 component of the proposed project is aligned with these projections. Therefore, implementation of the Vista Ranch Development/MP Area 1 would not diminish capacity for other planned developments within the City. As previously discussed, a project would be considered to result in a potentially significant impact during operation if it would result in wasteful, inefficient, or unnecessary consumption of energy resources. Considering the guidance provided by Appendix F of the CEQA Guidelines and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 164–168, a project could be considered to result in wasteful, inefficient, or unnecessary consumption of energy resources if it would conflict with the following energy conservation goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

Decreasing Overall Per Capita Energy Consumption

The Vista Ranch Development/MP Area 1's buildings would be designed and constructed in accordance with CALGreen energy efficiency standards of Title 24. Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. For example, the Title 24 Lighting Power Density requirements define

[22] Pacific Gas and Electric Company (PG&E). 2025. Integrated Resource Planning Background. Website: https://www.pge.com/en/about/doing-business-with-pge/integrated-resource-planning.html. Accessed July 22, 2025.

[23] Fresno County. 2025. EIR 8189 Key Energy Storage Project. Website: https://www.fresnocountyca.gov/Departments/Public-Works-and-Planning/divisions-of-public-works-and-planning/development-services-division/planning-and-land-use/environmental-impact-reports/eir-8189-key-energy-storage-project. Accessed July 22, 2025.

[24] California Energy Commission (CEC). 2018. Energy Research and Development Division Final Project Report Energize Fresno. November. Website: https://www.energy.ca.gov/sites/default/files/2021-06/CEC-500-2018-027.pdf. Accessed October 20, 2025.

[25] Pacific Gas and Electric Company (PG&E). 2024. PG&E's Grid Modernization Progress Report. April 24. Website: https://gridworks.org/wp-content/uploads/2024/04/PGE-Grid-Modernization-Report_April-2024.pdf. Accessed October 20, 2025.

the maximum wattage of lighting that can be used in a building based on its square footage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help to reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and would promote energy conservation. The decreasing reliance on fossil fuels and increasing use of renewable energy discussed below would also reduce per capita energy consumption for the proposed project. Therefore, the Vista Ranch Development/MP Area 1 would be consistent with this criterion.

Decreasing Reliance on Fossil Fuels

The Vista Ranch Development/MP Area 1 would incorporate elements from CALGreen, which would include water-efficient landscaping and the installation of solar panels. These features would reduce the amount of electricity used by the Vista Ranch Development/MP Area 1 during operation and, consequently, the amount of fossil fuels needed to generate power to meet this demand. For example, low water demand landscaping would reduce the amount of water that would need to be conveyed to the Vista Ranch Development/MP Area 1. Furthermore, the Vista Ranch Development/MP Area 1 would include EV charging infrastructure meeting CALGreen Tier 2 standards, which would promote the use of electric vehicles associated with development in MP Area 1, thereby reducing overall fuel consumption. Furthermore, the Vista Ranch Development/MP Area 1 would be all-electric in design and would not rely on natural gas and, thus, would have decreasing reliance on fossil fuel. Thus, the Vista Ranch Development/MP Area 1 would be consistent with this criterion.

Increasing Reliance on Renewable Energy Sources

As previously discussed, the Vista Ranch Development/MP Area 1 would include EV charging infrastructure meeting CALGreen Tier 2 standards, which would accelerate the region's and Vista Ranch Development/MP Area 1's adoption of EVs and allow the future transportation energy supply necessary for residents, employees, and visitors to be substituted with renewable energy sources. As such, the Vista Ranch Development/MP Area 1 would facilitate a greater dependence on renewable energy sources for building and transportation energy demands. Therefore, the Vista Ranch Development/MP Area 1 would be consistent with this criterion.

In summary, implementation of the Vista Ranch Development/MP Area 1 would decrease overall per capita energy consumption, decrease reliance on fossil fuels, and increase reliance on renewable energy during operation. Operational-related impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

This geographic scope includes the service territory defined by PG&E's distribution infrastructure and regulated boundaries established by the California Public Utilities Commission (CPUC). Accordingly, the relevant geographic scope includes PG&E's regional grid operations.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The cumulative analysis considers the foreseeable development in the PG&E service area in addition to the MP Area 2. This analysis evaluates whether the impacts associated with implementation of MP Area 2, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to wasteful or inefficient use of energy. This analysis also considers whether the incremental contribution of impacts associated with the implementation of MP Area 2 would be significant. If the implementation of MP Area 2 would create a cumulative impact or result in a cumulatively considerable contribution to a significant cumulative impact, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects.

Although cumulative development would increase regionwide energy demand, all cumulative projects would be required to comply with applicable ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code and Title 24 standards and with more stringent local codes and ordinances. These statewide and local codes mandate energy-efficient design, construction, and operational practices for all new buildings and major renovations. Compliance with Title 24, Part 6 ensures that cumulative projects meet or exceed minimum energy performance thresholds, while CALGreen (Title 24, Part 11) promotes sustainable building practices that reduce energy consumption and GHG emissions. As a result, cumulative development would incorporate energy conservation measures that minimize incremental demand on energy infrastructure. Thus, cumulative development would avoid inefficient, wasteful, or unnecessary energy consumption. Potential cumulative impacts would be less than significant, and the proposed project's incremental contribution would be limited in scale and not cumulatively considerable.

Vista Ranch Development/MP Area 1

The cumulative analysis considers the foreseeable development projects in the PG&E service area, in addition to the Vista Ranch Development/MP Area 1.

This analysis evaluates whether the impacts associated with implementation of the Vista Ranch Development/MP Area 1, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to wasteful or inefficient use of energy. This analysis also considers whether the incremental contribution of impacts associated with the implementation of the Vista Ranch Development/MP Area 1 would be significant. If the implementation of the Vista Ranch Development/MP Area 1 would create a cumulative impact or result in a cumulatively considerable contribution to a significant cumulative impact, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects.

Although cumulative development would increase regionwide energy demand, all cumulative projects would be required to comply with applicable ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code and Title 24 standards and with more stringent local codes and ordinances. These statewide and local codes mandate energy-efficient design, construction, and operational practices for all new buildings and major renovations. Compliance with Title 24, Part 6 ensures that cumulative projects meet or exceed minimum energy performance thresholds, while CALGreen (Title 24, Part 11) promotes sustainable building practices that reduce energy consumption and GHG emissions. As a result, cumulative development is reasonably anticipated to incorporate energy conservation measures that minimize incremental demand on energy infrastructure. Thus, cumulative development would avoid inefficient, wasteful, or unnecessary energy consumption. Potential cumulative impacts would be less than significant, and the proposed project's incremental contribution would be limited in scale and not cumulatively considerable.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Energy Plan Consistency

Impact ENER-2: The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that have not requested and would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

Implementation of MP Area 2 would include approximately 139 acres controlled by several property owners within the Master Plan Area. MP Area 2 plans for a mix of urban uses. Future development of MP Area 2 is at the discretion of the property owners and would be subject to future project-level CEQA analysis.

PG&E delivers electricity to homes and businesses. PG&E currently procures a greater portion of electric supply from renewable sources than is required by the RPS. Therefore, the MP Area 2 electricity provider currently meets the State's current objective of 33 percent renewable energy. At the time that development would happen in the future, the electricity provider would also be required to meet the State's future objective of 60 percent of in-state electricity sales being generated from renewable energy sources by 2030 and 100 percent electricity sales generated from renewable energy sources by 2045.

The MP Area 2 would also be required to be compliant with relevant Title 24 standards and would adhere to the most current energy efficiency, water efficiency, and material conservation requirements. As stated, the remaining 139 acres which comprise MP Area 2 are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. Therefore, MP Area 2 would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Vista Ranch Development/MP Area 1

Implementation of the Vista Ranch Development/MP Area 1 would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities. PG&E would provide electricity service to MP Area 1. PG&E delivers electricity to homes and businesses. PG&E currently procures a greater portion of electric supply from renewable sources than is required by the RPS.[26] Therefore, the Vista Ranch Development/MP Area 1 electricity provider meets the State's current objective of 33 percent renewable energy. The Vista Ranch Development/MP Area 1 electricity provider would also be required to meet the State's future objective of 60 percent of in-state electricity sales being generated from renewable energy sources by 2030.

The Vista Ranch Development/MP Area 1 would also be compliant with Title 24 standards, would be all-electric in design (consistent with the goals of the State's Scoping Plan), and would adhere to the energy efficiency, water efficiency, and material conservation requirements. Additionally, the Vista Ranch Development/MP Area 1 would include EV charging infrastructure, walking trails, bicycling paths, and landscaped areas featuring drought-tolerant plants. Overall, the Vista Ranch Development/MP Area 1 would align with relevant and applicable State policies or plans, including:

- **California Energy Efficiency Strategic Plan**: All-electric design and EV infrastructure that support the State's decarbonization goals.
- **Title 24 Building Energy Efficiency Standards**: Compliance with the latest Title 24 standards.
- **City of Clovis General Plan**: Supports the City's goals for sustainable development and reduced GHG emissions by promoting a mix of housing densities and uses, as well as walking and bicycling trails.

[26] Pacific Gas and Electric Company (PG&E). 2024 Power Content Label. Website: https://www.pge.com/assets/pge/docs/about/corporate-responsibility-and-sustainability/2024-pcl-pacific-gas-and-electric-company.pdf. Accessed October 5, 2025.

Therefore, the Vista Ranch Development/MP Area 1 would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Impacts

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The cumulative analysis considers the foreseeable development projects in the City, in addition to the MP Area 2, which would be the geographic scope of the cumulative energy analysis.

This analysis evaluates whether the impacts of MP Area 2, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to energy. This analysis also considers whether the incremental contribution of impacts associated with the implementation of MP Area 2 would be significant. If MP Area 2 would create a cumulative impact or result in a cumulatively considerable contribution to a significant cumulative impact, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects.

Although cumulative development would increase citywide energy demand, all cumulative projects would be required to comply with applicable ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code and Title 24 standards and with more stringent local codes and ordinances.

Similarly, the incorporation of the Title 24 standards, as well as more stringent local codes, where applicable, into the proposed project and cumulative projects would ensure that implementation of these projects would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. In addition, projects served with electricity provided by PG&E would be receiving electricity from a provider that exceeds the State's current renewable-source objective of 44 percent required by the RPS and is assumed to continue complying with State law related to increasing the percentage of electricity from renewable and carbon-free sources. The implementation of MP Area 2, in conjunction with other planned and approved projects, would not impede PG&E from meeting the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030. Therefore, implementation of MP Area 2, in conjunction with other planned and approved projects, would not create a significant cumulative impact related to the potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency and the contribution from implementation of MP Area 2 would be less than cumulatively considerable.

Vista Ranch Development/MP Area 1

The cumulative analysis considers the foreseeable development projects in the City, in addition to the Vista Ranch Development/MP Area 1, which would be the geographic scope of the cumulative energy analysis.

This analysis evaluates whether the impacts of the Vista Ranch Development/MP Area 1, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to energy. This analysis also considers whether the incremental contribution of impacts associated with the implementation of the Vista Ranch Development/MP Area 1 would be significant. If the Vista Ranch Development/MP Area 1 would create a cumulative impact or result in a cumulatively considerable contribution to a significant cumulative impact, this analysis will then evaluate feasible cumulative mitigation that would reduce cumulative effects.

Although cumulative development would increase citywide energy demand, all cumulative projects would be required to comply with applicable ordinances and policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code and Title 24 standards and with more stringent local codes and ordinances.

Similarly, the incorporation of the Title 24 standards, as well as more stringent local codes, where applicable, into the Vista Ranch Development/MP Area 1 and cumulative projects would ensure that implementation of these projects would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. In addition, projects served with electricity provided by PG&E would be receiving electricity from a provider that exceeds the State's current renewable-source objective of 44 percent required by the RPS and is assumed to continue complying with State law related to increasing the percentage of electricity from renewable and carbon-free sources. The implementation of the Vista Ranch Development/MP Area 1, in conjunction with other planned and approved projects, would not impede PG&E from meeting the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030. Therefore, the Vista Ranch Development/MP Area 1, in conjunction with other planned and approved projects, would not create a significant cumulative impact related to the potential to conflict with or obstruct a State or local plan for renewable energy or energy efficiency and the Vista Ranch Development/MP Area 1 contribution would be less than cumulatively considerable.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.7 - Geology, Soils, and Seismicity

3.7.1 - Introduction

This section describes existing conditions related to geology and soils in the region and project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to geology and soils that could result from implementation of the proposed project.

Information included in this section is based, in part, on the Geotechnical Engineering Investigation Proposed Residential Development, Behymer and Armstrong Avenues, Clovis California, prepared by Krazan & Associates, Inc. and dated March 10, 2021 (2021 Geotechnical Investigation); the Geotechnical Feasibility Evaluation, Triangle Development, Shepherd Avenue and Locan Avenue, Clovis California, prepared by Krazan & Associates, Inc. and dated December 7, 2023 (revised January 4, 2024) (2024 Geotechnical Feasibility Evaluation); and the Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis California, prepared by Krazan & Associates, Inc. and dated January 31, 2024 (2024 Geotechnical Investigation), which are included in Appendix G, as well as the 2014 City of Clovis General Plan (General Plan), General Plan and Development Code Update Environmental Impact Report (General Plan EIR), the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS), Fresno County, California Hazard Mitigation Plan, and the United States Geological Survey (USGS).

- **2021 Geotechnical Investigation:** Evaluated approximately 168.68 acres on Assessor's Parcel Numbers (APNs) 557-012-02, 557-012-28, 557-012-29, 557-022-11, 557-031-24, 557-031-25, and 557-031-37.
- **2024 Geotechnical Feasibility Evaluation:** Evaluated approximately 165 acres adjacent to the Big Dry Creek Reservoir Dam.
- **2024 Geotechnical Investigation:** Evaluated approximately 160.5 acres on APNs 557-031-23, 557-031-27, 557-031-35, 557-031-055, and 557-031-445.

During the Revised Draft EIR (Revised Draft EIR) Notice of Preparation (NOP) scoping period, no public comments were received related to geology and soils.

3.7.2 - Environmental Setting

Geologic Setting

Regional Setting

The Sphere of Influence (SOI) Expansion Area is in the southern portion of the Great Valley geomorphic province, an alluvial plain about 50 miles wide and 400 miles long.[1] The southern portion

[1] California Department of Conservation (DOC). 2002. California Geologic Survey, California Geomorphic Provinces. Website: https://www.conservation.ca.gov/cgs/Documents/Publications/CGS Notes/CGS-Note-36.pdf. Accessed April 3, 2025.

of the Great Valley is also referred to as the San Joaquin Valley. The San Joaquin Valley, which includes the City of Clovis's (City's) area, is a topographic and structural basin that is bounded on the east by the Sierra Nevada and on the west by the Coast Ranges.[2] The Sierra Nevada, a fault block dipping gently southwestward, is made up of igneous and metamorphic rocks of pre-Tertiary age that comprise the basement complex beneath the Valley. The Coast Ranges contain folded and faulted sedimentary rocks of Mesozoic and Cenozoic age, which are like those rocks that underlie the Valley at depth and nonconformally overlie the basement complex; gently dipping to nearly horizontal, sedimentary rocks of Tertiary and Quaternary age overlie the older rocks. These younger rocks are mostly of continental origin and were derived from the Sierra Nevada. The San Joaquin River is the principal river in the area and is located north and west of the SOI Expansion Area. Big Dry Creek is a seasonal tributary of the San Joaquin River; the original channel of the creek runs east to west across the central portion of the SOI Expansion Area. Alluvial fans formed by the San Joaquin River and Big Dry Creek are the largest geomorphic features in the City's area. The formation of the fans has resulted in rather flat regional topography.

Local Setting

The SOI Expansion Area is primarily underlain by alluvial deposits consisting of silts, sands, and gravels part of the larger Central Valley geologic province. Soil types in the project area are predominantly sandy loams and clay loams.

Existing Soils

An NRCS WSS Soils Map is provided in Exhibit 3.2-2 in Section 3.2, Agricultural Resources. Additionally, Table 3.2-5 in Section 3.2, Agricultural Resources, identifies the type and range of soils found in the Master Plan Area.

Each soil series is described below, followed by a description of the physical soil properties:[3,4]

- **Alamo clay**. The Alamo series consists of moderately deep to hardpan, poorly drained soils that formed in alluvium from mixed sources. Alamo soils are in basins and drainageways on floodplains and fan remnants. Slope ranges from 0 to 2 percent. Erosion potential is moderate (K factor 0.24). Linear extensibility is high.
- **Atwater sandy loam.** The Atwater series consists of very deep, well drained soils formed in granitic alluvium. This series is characterized as well draining, with moderately rapid permeability and slow runoff. The soils are formed in dunes of uniformly sorted material containing a minimum of coarse and very coarse particles. They have mixed mineralogy. Erosion potential is moderate (K factor 0.24 to 0.28). Linear extensibility is low.

[2] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

[3] United States Department of Agriculture (USDA). 2025. Official Soil Series Description. Website: https://soilseries.sc.egov.usda.gov/osdname.aspx. Accessed April 3, 2025.

[4] United States Department of Agriculture (USDA) National Resources Conservation Service (NRCS). 2025. Web Soil Survey. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed April 3, 2025.

- **Blasingame loam.** The Blasingame series consists of moderately deep, well drained soils that formed in material weathered from basic igneous rocks. Erosion potential is moderate (K factor 0.37). Linear extensibility is low to moderate.
- **Cometa-San Joaquin sandy loams.** The Cometa series consists of moderately deep, moderately well or well drained soils that formed in alluvium from granitic rock sources. The soils occur on the east side of the lower Sacramento and San Joaquin Valleys and intermountain valleys of the central Coast Range. Erosion potential is moderate (K factor 0.28 to 0.32). Linear extensibility is low to high.
- **Delhi loamy sand.** The Delhi series consists of very deep, somewhat excessively drained soils. They formed in wind modified material weathered from granitic rock sources. Delhi soils are on floodplains, alluvial fans, and terraces. Erosion potential is low to moderate (K factor 0.15 to 0.24). Linear extensibility is low.
- **Dello sandy loam.** The Dello series consist of very deep, very poorly drained soils that formed in alluvium from granitic rock sources. Dello soils are on nearly level flood plains, slough remnants and small depressions in the San Joaquin Valley and the Sacramento-San Joaquin Delta. Erosion potential is low to moderate (K factor 0.05 to 0.24). Linear extensibility is low.
- **Foster loam.** The Foster series is a member of a coarse-loamy mixed, noncalcareous, thermic family of Aquic Haploxerolls. The Foster soils occur on flood plains and nearly level recent alluvial fans. They are formed in deep coarse textured alluvium from granitic rocks. They are poorly or very poorly drained with moderate permeability and ponded to very slow runoff. Erosion potential is moderate to moderately-high (K factor 0.24 to 0.49). Linear extensibility is low.
- **Grangeville fine sandy loam.** This series consists of very deep, somewhat poorly drained soils that formed in moderate coarse textured alluvium dominantly from granitic rock sources. Grangeville soils are on alluvial fans and floodplains and have slopes ranging from 0 to 2 percent. This series is characterized by negligible to very low runoff, moderately rapid permeability, and moderate permeability in saline-sodic phases. Erosion potential is low to moderate (K factor 0.10 to 0.28). Linear extensibility is low.
- **Greenfield sandy loam**. The Greenfield series consists of deep, well drained soils that formed in moderately coarse and coarse textured alluvium derived from granitic and mixed rock sources. Greenfield soils are on alluvial fans and terraces and have slopes of 0 to 30 percent. Erosion potential is moderate (K factor 0.24). Linear extensibility is low.
- **Hildreth clay.** The Hildreth series consists of deep, somewhat poorly drained soils that formed in valley fill derived from acid igneous rocks. Hildreth soils are in swales and in sluggish, intermittent drainageways on valley fill. Erosion potential is moderate (K factor 0.20 to 0.24). Linear extensibility is moderate to high.
- **Los Robles loam.** The Los Robles series consists of very deep and deep well drained soils formed in material weathered from basalt and andesitic rocks. The Los Robles soils are on fans and terraces and have slopes of 0 to 15 percent. Erosion potential is moderate (K factor 0.20 to 0.37). Linear extensibility is low.

- **Millerton rocky fine sandy loam**. The Millerton series is a member of a loamy, mixed, thermic family of Lithic Haploxeralf. The Millerton soils occur on smooth rolling to very steep hills and ridges underlain by metamorphic basic igneous rock. They are well to somewhat excessively drained with moderately rapid permeability and medium to rapid runoff. Erosion potential is moderate (K factor 0.37). Linear extensibility is low.
- **Ramona loam**. The Ramona series is a member of the fine-loamy, mixed, thermic family of Typic Haploxeralfs. The series is well drained, with slow to rapid runoff and moderately slow permeability. They are used mostly for production of grain, grain-hay, pasture, irrigated citrus, olives, truck crops, and deciduous fruits. Uncultivated areas have a cover of annual grasses, forbs, chamise or chaparral. Erosion potential is moderate to moderately-high (K factor 0.24 to 0.49). Linear extensibility is low to moderate.
- **Riverwash.** Riverwash consists of very deep alluvial materials in stream channels that are frequently flooded.[5] Little or no vegetation grows on Riverwash because of the flooding. No attempt is made to classify these materials because of the instability of the unit. The unit is subject to erosion and deposition during flooding events. Erosion potential is low to moderate (K factor 0.10 to 0.37). Linear extensibility is low.
- **San Joaquin loam.** The San Joaquin series consists of moderately deep to a duripan, well and moderately well drained soils that formed in alluvium derived from mixed but dominantly granitic rock sources. They are on undulating low terraces with slopes of 0 to 9 percent. The series is characterized by well and moderately well drained, with medium to very high runoff and very slow permeability. Erosion potential is moderate (K factor 0.28 to 0.32). Linear extensibility is low to high.
- **Tujunga loamy sand.** This series consists of very deep, somewhat excessively drained soils that formed in alluvium from granitic sources. Tujunga soils are on alluvial fans and floodplains, including urban areas. Slopes range from 0 to 12 percent. They are somewhat excessively drained, with negligible to low runoff and high saturated hydraulic conductivity. Erosion potential is low to moderate (K factor 0.17 to 0.24). Linear extensibility is low.
- **Visalia sandy loam**. The Visalia series is coarse-loamy, mixed, alluvium derived from granite. This series is well drained with very low runoff. Erosion potential is low to moderate (K factor 0.15 to 0.24). Linear extensibility is low.
- **Yokohl loam**. The Yokohl Series is a member of a fine, montmorillonitic, thermic family of Typic Durixeralfs. The Yokohl soils occur on gently sloping old fans and terraces on alluvium from dominantly basic igneous rock. Yokohl soils are well drained. Runoff is very slow to rapid and permeability is slow to very slow. Erosion potential is moderate to moderately-high (K factor 0.28 to 0.43). Linear extensibility is low to high.

[5] University of California, Davis. 2025. Riverwash. Website: https://lawr.ucdavis.edu/classes/ssc118/Colusa_County/riverwash.html. Accessed April 3, 2025.

Faults and Seismicity

Faults

Faults are defined as tectonic fractures or breaks in the earth's crust along which displacement (horizontal, vertical, or diagonal movement) has taken place.[6] Movement between these plates may occur rapidly, in the form of an earthquake, or may occur slowly, in the form of creep.[7] During an earthquake, the rock on one side of the fault suddenly slips with respect to the other.

Faults are classified as Historic, Holocene, Late Quaternary, Quaternary, and pre-Quaternary according to the age of most recent movement.[8] These classifications are described as follows:

- **Historic:** faults on which surface displacement has occurred within the past 200 years;
- **Holocene:** shows evidence of fault displacement within the past 11,000 years, but without historic record;
- **Late Quaternary:** shows evidence of fault displacement within the past 700,000 years, but may be younger due to a lack of overlying deposits that enable more accurate age estimates;
- **Quaternary:** shows evidence of displacement sometime during the past 1.6 million years; and
- **Pre-Quaternary:** without recognized displacement during the past 1.6 million years.

Faults are further distinguished as active, potentially active, or inactive.[9]

- **Active:** An active fault is a Historic or Holocene fault that has had surface displacement within the last 11,000 years;
- **Potentially Active:** A potentially active fault is a pre-Holocene Quaternary fault that has evidence of surface displacement between about 1.6 million and 11,000 years ago; and
- **Inactive:** An inactive fault is a pre-Quaternary fault that does not have evidence of surface displacement within the past 1.6 million years. The probability of fault rupture is considered low; however, this classification does not mean that inactive faults cannot, or will not, rupture.

Exhibit 3.7-1 provides a map of known nearby faults in relation to the SOI Expansion Area. The closest known fault to the SOI Expansion Area is the Clovis Fault, which extends northwest-southeast

[6] California Department of Conservation (DOC). 2010. An Explanatory Text to Accompany the Fault Activity Map of California. Website: https://www.conservation.ca.gov/cgs/Documents/Melange/FAM_phamplet.pdf. Accessed April 3, 2025.

[7] United States Geological Survey (USGS). 2025. What Is a Fault and What are the Different Types. Website: https://www.usgs.gov/faqs/what-a-fault-and-what-are-different-types. Accessed April 3, 2025.

[8] California Department of Conservation (DOC). 2010. An Explanatory Text to Accompany the Fault Activity Map of California. Website: https://www.conservation.ca.gov/cgs/Documents/Melange/FAM_phamplet.pdf. Accessed April 3, 2025.

[9] Ibid.

from just north of the SOI Expansion Area.[10] The Clovis Fault is a pre-Quaternary fault or fault without recognized Quaternary displacement.[11] A number of mapped Historic and Holocene faults are located near the Coast Ranges and Sierra Nevada mountain ranges, including the Nuñez Fault, which experienced surface rupture in 1983.[12] The Owens Valley Fault Zone bounds the eastern edge of the Sierra Nevada block, approximately 80 miles east of the SOI Expansion Area, and contains both active and potentially active faults.[13] Portions of the Ortigalita, Calaveras, Hayward, and Rinconada Faults, located more than 60 miles west of the SOI Expansion Area, are considered potentially active. The San Andreas Fault is possibly the best-known fault and is located approximately 60 to 70 miles west of the SOI Expansion Area.

Surface fault rupture is the result of fault movement that breaks to the surface of the earth either suddenly during earthquakes, or slowly due to a process known as fault creep, and is the result of tectonic movement that originates deep in the earth.[14] Surface fault rupture poses a hazard to structures and infrastructure because the displacement that occurs can severely damage buildings. Fault rupture almost always follows pre-existing faults, which are zones of weakness.[15]

The Alquist-Priolo Fault Zoning Act requires active earthquake fault zones to be mapped and it provides special development considerations within these zones. It is important to note that the Alquist-Priolo Act only addresses the hazard of surface fault rupture for Holocene-active faults; Pre-Holocene faults may also have the potential to rupture but are not addressed by the Alquist-Priolo Act.

As shown in Exhibit 3.7-1, the SOI Expansion Area is not within an Alquist-Priolo Special Study Zone. The nearest Alquist-Priolo Earthquake Fault Zone, the Nuñez Fault Zone, is located approximately 60 miles southwest of the SOI Expansion Area.

[10] California Department of Conservation (DOC). 2015. Fault Activity Map. Website: https://maps.conservation.ca.gov/cgs/fam/. Accessed April 3, 2025.

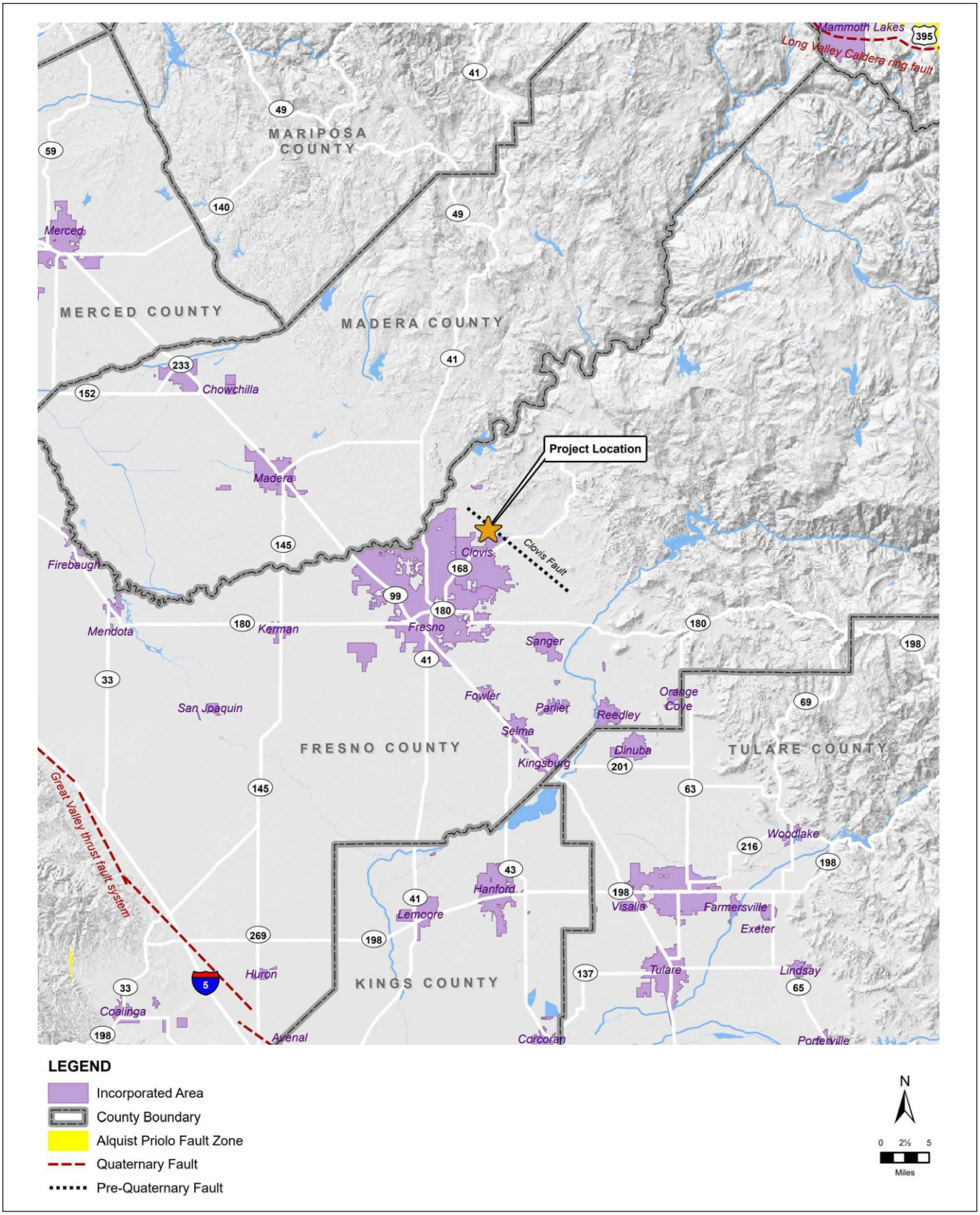
[11] California Department of Conservation (DOC). 2010. An Explanatory Text to Accompany the Fault Activity Map of California. Website: https:// www.conservation.ca.gov/cgs/Documents/Melange/FAM_phamplet.pdf. Accessed April 3, 2025

[12] Ibid.

[13] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

[14] Ibid.

[15] California Department of Conservation (DOC). 2023. CGS Note 54. Website: https:///www.conservation.ca.gov/cgs/documents/publications/cgs-notes/CGS-Note-54-SoCal-Regulatory-Earthquake-Hazard-Zones-a11y.pdf. Accessed April 3, 2025.



Source: De Novo Planning Group, February 14, 2023. USGS California State GeoPortal; Fresno County GIS.

Exhibit 3.7-1
Earthquake Faults Map

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Seismicity

The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Seismicity can result in seismic-related hazards, such as fault rupture, ground shaking, and liquefaction. Faults form in rocks when stresses overcome the internal strength of the rock, and fault rupture occurs when movement on a fault breaks through to the surface and can result in damage to infrastructure and persons. Ground movement during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and type of geologic material. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Strong ground shaking from an earthquake can result in damage, with buildings shifted off their foundations and underground pipes broken.

Earthquakes are generally expressed in terms of intensity and magnitude. Several scales may be used to measure the strength or intensity of an earthquake.[16] Magnitude scales, like the moment magnitude (Mw), measure the size of the earthquake at its source. An earthquake event has a single magnitude; however, the degree of ground shaking that the earthquake causes varies from place to place based on distance, type of surface material, and other factors. Magnitude is expressed as a number. For example, a magnitude 5.3 is a moderate earthquake, and a 6.3 is a strong earthquake. Because of the logarithmic basis of the magnitude scale, each whole number increase in magnitude represents a tenfold increase in measured amplitude as measured on a seismogram.

In contrast to magnitude, other scales describe earthquake intensity, which can vary depending on distance from earthquake epicenter and local characteristics. The Modified Mercalli Intensity Scale expresses earthquake intensity experienced at a particular location on a scale of increasing levels of intensity that range from imperceptible shaking to catastrophic destruction. It does not have a mathematical basis; instead, it is an arbitrary ranking based on observed effects. Table 3.7-1 represents the potential effects of an earthquake based on the Modified Mercalli Intensities. Ground shaking of VII intensity was felt in the City from the 1872 Owens Valley Earthquake, the largest known earthquake event affecting the City's area.[17]

[16] United States Geological Survey (USGS). 2019. Earthquake Magnitude, Energy Release, and Shaking Intensity. Website: https://www.usgs.gov/programs/earthquake-hazards/earthquake-magnitude-energy-release-and-shaking-intensity. Accessed April 3, 2025.

[17] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

Table 3.7-1: Modified Mercalli Intensities and Effects

Intensity	Shaking	Description/Damage
I	Not felt	Not felt except by very few under especially favorable conditions.
II	Weak	Felt only by a few persons at rest, especially on upper floors of buildings.
III	Weak	Felt quite noticeably by persons indoors, especially on upper floors of buildings. Many people do not recognize it as an earthquake. Vibrations similar to the passing of a truck.
IV	Light	Felt indoors by many, outdoors by few during the day. At night, some awakened. Dishes, windows, doors disturbed; walls make cracking sound. Sensation like a heavy truck striking a building. Standing vehicles are rocked noticeably.
V	Moderate	Felt by nearly everyone; many awakened: Some dishes and windows are broken. Unstable objects are overturned. Pendulum clocks may stop.
VI	Strong	Felt by all, and many are frightened. Some heavy furniture is moved; a few instances of fallen plaster occur. Damage is slight.
VII	Very Strong	Damage is negligible in buildings of good design and construction; slight to moderate in well-built ordinary structures; considerable damage in poorly built or badly designed structures; some chimneys are broken.
VIII	Severe	Damage slight in specially designed structures; considerable damage in ordinary substantial buildings with partial collapse. Damage great in poorly built structures. Fall of chimneys, factory stacks, columns, monuments, walls. Heavy furniture overturned.
IX	Violent	Damage is considerable in specially designed structures; well-designed frame structures are thrown out of plumb. Damage is great in substantial buildings, with partial collapse. Buildings are shifted off foundations.

Source: United States Geological Survey (USGS). The Modified Mercalli Intensity Scale. Website: https://www.usgs.gov/programs/earthquake-hazards/modified-mercalli-intensity-scale. Accessed April 3, 2025.

Seismic Ground Shaking

Although most of Fresno County is situated within an area of relatively low seismic activity, the faults and fault systems that lie along the eastern and western boundaries of Fresno County, as well as other regional faults, have the potential to produce high-magnitude earthquakes throughout the County.[18] A high-magnitude earthquake on one of these faults could cause moderate intensity ground shaking in Fresno County.

The most probable sources of earthquakes that might cause damage to the City's area are the Owens Valley Fault Group approximately 68 miles to the northeast, the Foothills Suture Fault Zone

[18] County of Fresno. 2024. Hazard Mitigation Plan, Annex A: City of Clovis. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/county-administrative-office/hazard-mitigation-plan/annex-files/draft-annex-a-city-of-clovis.pdf. Accessed April 3, 2025.

approximately 75 miles to the north, the San Andreas Fault approximately 80 miles to the southwest, and the White Wolf Fault located about 120 miles to the south.[19] A maximum probable earthquake on any of the major faults would produce a peak ground acceleration in the area of about 0.1g, as ground deceleration generally decreases with increasing distance from the earthquake source.[20] This level of ground shaking correlates to a Modified Mercalli intensity of I to V, light to moderate.

Slope Disturbance

Slope disturbance from long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rockfall. The project area is seismically active with known faults; however, the project area does not contain active faults that would cause geologic uplifting. Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall—processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can creep away downslope sides of foundations and reduce lateral support.

Liquefaction

Liquefaction is a process whereby soil is temporarily transformed into a fluid form during intense and prolonged ground shaking.[21] Under certain circumstances, the ground shaking can temporarily transform an otherwise solid material into a fluid state. Liquefaction is a serious hazard because buildings in areas that experience liquefaction may subside and suffer major structural damage. Liquefaction is most often triggered by seismic shaking, but it can also be caused by improper grading, landslides, or other factors. The potential for liquefaction is highest when groundwater levels are high, and loose, fine, sandy soils occur at depths of less than 50 feet.

According to the Fresno County Hazard Mitigation Plan, no specific countywide assessments to identify liquefaction hazards have been performed; however, areas of the San Joaquin Valley in Fresno County are not considered conducive to liquefaction due to soil types, because they are either too coarse or too high in clay content.[22] The California Geological Survey (CGS) Zones of Required Investigation map does not identify any seismically-induced liquefaction zones in the City or in the

[19] County of Fresno. 2024. Hazard Mitigation Plan, Annex A: City of Clovis. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/county-administrative-office/hazard-mitigation-plan/annex-files/draft-annex-a-city-of-clovis.pdf. Accessed April 3, 2025.

[20] Peak ground acceleration is calculated as the greatest increase in velocity recorded by a particular station during an earthquake, and typically given in units of g (Earth's gravitational acceleration on its surface). Generally, peak ground acceleration values of less than 0.1 g are not expected to cause much damage.

[21] Fresno County. 2024. Fresno County, California Hazard Mitigation Plan. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/resources/hazard-mitigation-plan/draft-2024-fresno-county-hazard-mitigation-plan.pdf. Accessed May.

[22] Ibid.

SOI Expansion Area.[23] Additionally, the 2021 and 2024 Geotechnical Investigations concluded that the risk of liquefaction within the Master Plan Area is low, and liquefaction is not considered a potential hazard.[24, 25]

Lateral Spreading

Lateral spreading is a type of ground deformation that occurs when surface material extends or spreads on gentle slopes.[26] Ground shaking, especially when inducing liquefaction, may cause lateral spreading toward unsupported slopes.

Since the potential for liquefaction is low, the potential for lateral spreading is also considered low; additionally, the City and surrounding area is essentially flat and lateral spreading of soils has not been observed.

Other Geologic Hazards

Expansive Soils

Expansive soils can undergo significant volume change with changes in moisture content. In general, expansive soils shrink and harden when dried and swell and soften when wet. Such changes can cause distress to building foundations and structures, slabs on grade, pavements, and other surface improvements.

Linear extensibility refers to the change in length of an unconfined clod as moisture content is decreased from a moist to a dry state.[27] Linear extensibility is used to determine the shrink-swell potential of soils. The shrink-swell potential is low if the soil has a linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. If the linear extensibility is more than three, shrinking and swelling can cause damage to buildings, roads, and other structures and to plant roots; special design commonly is needed.

According to the NRCS WSS, the soils in SOI Expansion Area generally have a low shrink-swell potential, with the highest potential occurring in the Non-development Area; refer to Exhibit 3.2-2 in Section 3.2, Agricultural Resources. The 2024 Geotechnical Investigation encountered upper soils

[23] California Department of Conservation (DOC), California Geological Survey (CGS). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

[24] Krazan & Associates, Inc. 2021. Geotechnical Engineering Investigation Proposed Residential Development, Behymer and Armstrong Avenues, Clovis, California. March 10.

[25] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

[26] United States Geological Survey (USGS). 2023. Lateral Spread. Website: https://www.usgs.gov/media/images/lateral-spread. Accessed April 3, 2025.

[27] United States Department of Agriculture (USDA), National Resource Conservation Service (NRCS). 2024. National Soil Survey Handbook. Website: https://directives.nrcs.usda.gov//sites/default/files2/1725389663/National%20Soil%20Survey%20Handbook%20%28entire%20handbook%29.pdf. Accessed April 3, 2025.

consisting of silty sand, sandy silt, clayey sand, silty sand/sandy silt, and clayey sand.[28] The 2024 Geotechnical Investigation indicates that the clayey soils appeared to have a low to moderate swell potential.

Erosion

Erosion refers to a process of wearing away of the land surface (e.g., rocks, soil) by running water, waves, or moving ice and wind, or by such processes as mass wasting and corrosion.[29] Two common types of soil erosion include wind erosion and water erosion. Erosion potential in soils is influenced by several factors, including rainfall intensity, steepness and length of slope, vegetative cover, and management practices.[30] Loose soils can be eroded by water or wind forces, whereas soils with high clay content are generally susceptible to water erosion. The potential for erosion generally increases because of human activity, such as through the development and the removal of vegetative cover.

The NRCS WSS identified the erosion potential for the soils in the SOI Expansion Area. This report summarizes those soil attributes used by the Revised Universal Soil Loss Equation Version 2 (RUSLE2) for the map units in the selected area. Soil property data for each map unit component includes the hydrologic soil group, erosion factors Kf for the surface horizon, erosion factor T, and the representative percentage of sand, silt, and clay in the surface horizon.

Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water.[31] Values of K range from 0.02 to 0.69. Other factors being equal, the higher the value, the more susceptible the soil is to sheet and rill erosion by water. Within the SOI Expansion Area, the erosion factor Kf exhibits a wide range, varying from 0.05 to 0.49, which is considered a low- to moderately-high potential for erosion; however, most of the SOI Expansion Area, particularly Master Plan (MP) Area 1, exhibits an erosion factor Kf of low to moderate. Furthermore, because the SOI Expansion Area is relatively flat, the erosion potential is slight.

Collapsible Soils

Collapsible soils are defined as any unsaturated soil that goes through a radical rearrangement of particles and greatly decreases in volume upon wetting, additional loading, or both.[32] These soils are typically found in arid or semiarid regions and have a loose soil structure and a water content far less

[28] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

[29] United States Department of Agriculture (USDA), National Resource Conservation Service (NRCS). 2024. National Soil Survey Handbook. Website: https://directives.nrcs.usda.gov//sites/default/files2/1725389663/National%20Soil%20Survey%20Handbook%20%28entire%20handbook%29.pdf. Accessed April 3, 2025.

[30] University of California, Division of Agriculture and Natural Resources. 2006. Erodibility of Agricultural Soils, with Examples in Lake and Mendocino Counties. Website: https://anrcatalog.ucanr.edu/pdf/8194.pdf. Accessed April 3, 2025.

[31] United States Department of Agriculture (USDA), California Geological Survey (CGS). 2024. National Soil Survey Handbook. Website: https://directives.nrcs.usda.gov//sites/default/files2/1725389663/National%20Soil%20Survey%20Handbook%20%28entire%20handbook%29.pdf. Accessed April 3, 2025.

[32] United States Department of the Interior. 1992. Characteristics and Problems of Collapsible Soils. Website: https://www.usbr.gov/tsc/techreferences/rec/R9202.pdf. Accessed April 3, 2025.

than saturation. Four conditions are necessary for soil collapse to occur: an open, partially unstable, partially saturated fabric; sufficient total stress to make the soil structure metastable; presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and the addition of water, which reduces soil suction, or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts.[33] Examples of common problems associated with collapsible soils include tilting floors, cracking or separation in structures, sagging floors, and nonfunctional windows and doors.

Landslides

The CGS classifies landslides based on the type of material that failed and the type of movement that the failed material exhibited.[34] Material types are broadly categorized as either rock or soil, or a combination of the two for complex movements. Landslide movements are categorized as falls, topples, spreads, slides, or flows. Landslide potential is influenced by physical factors, such as slope, soil, vegetation, and precipitation. Landslides require a slope and can occur naturally from seismic activity, excessive saturation, and wildfires, or from human-made conditions, such as construction disturbance, vegetation removal, or wildfires.

The SOI Expansion Area is mostly flat; therefore, the potential for a landslide in the SOI Expansion Area is low to non-existent. Additionally, the CGS Zones of Required Investigation map does not identify any seismically-induced landslide zones in the City or SOI Expansion Area.[35]

Subsidence

Land subsidence is a gradual settling or sudden sinking of Earth's surface due to the removal or displacement of subsurface earth materials.[36] Common causes of land subsidence include: aquifer system compaction associated with groundwater withdrawals; drainage of organic soils; underground mining; and natural compaction or collapse. Subsidence takes place gradually, usually over a period of several years. According to the California Department of Water Resources' land subsidence data, the closest monitoring station to the SOI Expansion Area (located approximately 11 miles southwest of the SOI Expansion Area) experienced a vertical displacement rate of -0.12 feet per year for the period of record (2006 to 2024).[37]

[33] California Department of Transportation (Caltrans). 2024. Geotechnical Manual, Collapsible Soil. Website: https://dot.ca.gov/-/media/dot-media/programs/engineering/documents/geotechnical-services/202402-gm-collapsiblesoil-a11y.pdf. Accessed April 3, 2025.

[34] California Department of Conservation (DOC). 2025. Landslides. Website: https://www.conservation.ca.gov/cgs/landslides. Accessed April 3, 2025.

[35] California Department of Conservation (DOC). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

[36] United States Geological Survey (USGS). 2019. Land Subsidence. Website: https://www.usgs.gov/mission-areas/water-resources/science/land-subsidence#overview. Accessed April 3,2025.

[37] California Department of Water Resources. 2024. Continuous GPS Stations. Website: https://dwr.maps.arcgis.com/apps/dashboards/213fcb302b5d413499b2495b2c6080e5. Accessed April 3, 2025.

Paleontological Resources

Paleontological resources include fossilized remains, traces, or imprints of organisms, preserved in or on Earth's crust, that are of paleontological interest and provide information about the history of life on Earth.[38]

The following summary of the geological evolution of the City and the potential for paleontological resources is based on the General Plan EIR.[39]

The General Plan Planning Area, which includes the SOI Expansion Area, overlies recent alluvium, Pleistocene river and possibly lake sediments, and pre-Cretaceous metasedimentary rocks, and has either low or undetermined paleontological sensitivity.

Recent alluvium is a coarse-grained unconsolidated river wash, typically too young to contain any fossil resources. Thus, it is considered a formation of low paleontological sensitivity. Pre-Cretaceous metasedimentary rocks have the potential to contain fossils, but they would have been destroyed by the present day. Therefore, it is also considered a formation of low sensitivity.

Pleistocene river and lake sediments could potentially contain significant nonrenewable paleontological resources. Three sedimentary formations are exposed in the City: Modesto Formation (Upper Unit); Riverbank Formation (Middle Unit); and Turlock Lake Formation (Upper Unit). Modesto Formation (Upper Unit) is primarily composed of Sierran arkosic sand and gravel, preceding fine sand, and silt near the lower San Joaquin River. Carbon dating determines the Modesto Formation to be 9,000 to 27,000 years old. Riverbank Formation (Middle Unit) is composed of yellowish-brown sandy loam. According to uranium dating, this unit is about 45,000 to 260,000 years old. A vertebrate fauna assigned to the Rancholabrean Land Mammal Age has been found in this unit. The Turlock Lake Formation (Upper Unit) contains stratified silt and fine sand, approximately 600,000 years old. Irvingtonian Land Mammal Age vertebrate fossils have been recovered in several locations in this unit. Thus, the General Plan EIR concludes that Pleistocene river and lake sediments are considered an area of undetermined paleontological sensitivity and may contain undiscovered resources.

The following summary of the geological evolution of the project area and the potential for paleontological resources is based on the Cultural Resources Inventory Report conducted as part of this proposed project; refer to Appendix F.[40]

[38] Office of the Law Revision Counsel. 2025. United States Code, Title 16, Chapter 1c, Section 470aaa, Definitions. Website: https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title16-section470aaa&num=0&edition=prelim. Accessed April 3, 2025.

[39] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report, Chapter 5.5, Cultural Resources. August. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-05-Cultural-Resources.pdf. Accessed February 13, 2025

[40] ECORP Consulting, Inc. 2023. Cultural Resources Inventory Report, Triangle Property Project, Fresno County, California. January.

The geology of the southern portion of the SOI Expansion Area is composed primarily of Quaternary alluvium and marine deposits from the Pliocene through the Holocene. This portion is predominantly covered in alluvial sediments deposited by ancient and recent water flow. The northeastern portion of the SOI Expansion Area is identified as Mesozoic granitic rocks. The northern portion of the SOI Expansion Area near East Behymer Avenue is identified as undivided pre-Cenozoic metasedimentary and metavolcanic rocks of a wide variety, including slate, quartzite, chert, schists, gneiss, and minor marble.

In addition to the fossils found in the units described above, large mammal bones were discovered in the City area's river terraces, dated to the Pleistocene epoch. It should be noted that the Cultural Resources Inventory Report specific to MP Area 1 did not identify any paleontological resources in the study area.

3.7.3 - Regulatory Framework

Federal

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program (NEHRP) was established by the United States Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95–124. In establishing the NEHRP, Congress recognized that earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals remain unchanged:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary NEHRP agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS of the Department of the Interior
- Federal Emergency Management Agency (FEMA) of the Department of Homeland Security

Implementation of NEHRP priorities is accomplished primarily through original research, publications, and recommendations to assist and guide State, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

National Pollutant Discharge Elimination System

The National Pollutant Discharge Elimination System (NPDES) permit program, authorized by Section 402(p) of the federal Clean Water Act, controls water pollution by regulating point sources, such as construction sites and industrial operations that discharge pollutants into waters of the United States. A Storm Water Pollution Prevention Plan (SWPPP) is required to control discharges from a SOI Expansion Area, including soil erosion, to protect waterways. A SWPPP describes the measures or practices to control discharges during both the construction and operational phases of the project. A SWPPP identifies project design features and structural and nonstructural Best Management Practices (BMPs) that will be used to control, prevent, remove, or reduce stormwater pollution from the site, including sediment from erosion.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] Sections 2621 to 2630) was passed in 1972 to provide a statewide mechanism for reducing the hazard of surface fault rupture to structures used for human occupancy. The main purpose of the Act is to prevent the siting of buildings used for human occupancy across the traces of active faults. It should be noted that the Act addresses the potential hazard of surface fault rupture and is not directed toward other earthquake hazards, such as seismically-induced ground shaking or landslides.

The law requires the State Geologist to identify regulatory zones (known as Earthquake Fault Zones or Alquist-Priolo Earthquake Fault Zones) around the surface traces of active faults, and to depict these zones on topographic base maps, typically at a scale of 1 inch to 2,000 feet. Earthquake Fault Zones vary in width, although they are often 0.75-mile wide. Once published, the maps are distributed to the affected cities, counties, and State agencies for their use in planning and controlling new or renewed construction. With the exception of single-family wood frame and steel frame dwellings that are not part of a larger development (i.e., four units or more), local agencies are required to regulate development within the mapped zones. In general, construction within 50 feet of an active fault zone is prohibited.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (PRC §§ 2690–2699.6), which was passed in 1990, addresses earthquake hazards other than surface fault rupture. These hazards include strong ground shaking, earthquake-induced landslides, liquefaction, or other ground failures. Much like the Alquist-Priolo Earthquake Fault Zoning Act discussed above, these seismic hazard zones are mapped by the State Geologist to assist local government in the land use planning process. The Act states, “it is necessary to identify and map seismic hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety.” The Act also states, “cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.”

California Building Standards Code

The State provides minimum standards for building design through the California Building Standards Code (CBC) (California Code of Regulations [CCR], Title 24). Where no other building codes apply, Chapter 29 regulates excavation, foundations, and retaining walls. The CBC applies to building design and construction in the State and is based on the federal Uniform Building Code (UBC) used widely throughout the country (generally adopted on a state-by-state or district-by-district basis). The CBC has been modified for California conditions with more detailed and/or more stringent regulations.

The State earthquake protection law (California Health and Safety Code § 19100 *et seq*.) requires that structures be designed to resist stresses produced by lateral forces caused by wind and earthquakes. Specific minimum seismic safety and structural design requirements are set forth in Chapter 16 of the CBC. The CBC identifies seismic factors that must be considered in structural design. Chapter 18 of the CBC regulates the excavation of foundations and retaining walls, and Appendix Chapters J109 and J110 regulate grading activities, including drainage and erosion control and construction on unstable soils, such as expansive soils and areas subject to liquefaction.

The CBC is updated every 3 years, and the current 2022 CBC took effect January 1, 2023. The 2022 CBC has been adopted by the City according to Chapter 8.1.02 of the City of Clovis Municipal Code (CMC).

Local

City of Clovis General Plan

The General Plan includes several policies that are relevant to geology and soils. The General Plan policies applicable to the proposed project are identified below:[41]

Environmental Safety Element

Policy 1.3 **Geologic and seismic risk**. Prohibit development on unstable terrain, excessively steep slopes, and other areas deemed hazardous due to geologic and seismic hazards unless acceptable mitigation measures are implemented. Require that underground utilities be designed to withstand seismic forces and accommodate ground settlement.

Policy 1.5 **Critical and public facilities.** Locate and design critical and public facilities to minimize their exposure and susceptibility to flooding, seismic and geological effects, fire, and explosions. Ensure critical use facilities (e.g., hospital, police, and fire facilities) can remain operational during an emergency.

[41] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Open Space and Conservation Element

Policy 3.1 **Stormwater management.** Encourage the use of low impact development techniques that retain or mimic natural features for stormwater management.

Policy 3.2 **Stormwater pollution.** Minimize the use of non-point source pollutants and stormwater runoff.

City of Clovis Municipal Code

Chapter 8.1 of the CMC adopts the 2022 CBC, with amendments to address administrative provisions and additional requirements related to moved buildings, as the building code of the City.[42]

Chapter 9.110 provides subdivision design and improvement requirements. Per Section 9.110.040, a grading plan is required to be submitted to and approved by the City Engineer prior to issuance of a subdivision-level building permit.[43] Subdivisions are required to incorporate appropriate erosion and sediment control measures.

Chapter 9.114 provides standards for the preparation and review of soils reports. A preliminary soils report based upon adequate test borings and prepared by a registered civil engineer is required for every subdivision for which a final map is required or when required as a condition of development when soils conditions warrant the investigation and report.[44] A final soils report is required where a preliminary soils report was required, unless the final report is waived by the City Engineer.

Section 9.22.070 requires development to comply with the Alquist-Priolo Earthquake Fault Zoning Act and the Safety Element of the City's General Plan.[45]

Chapter 9.28 contains landscaping standards and requires a landscape design plan, irrigation design plan, and soil analysis to reduce runoff and control soil erosion as part of the landscape documentation package.[46]

3.7.4 - Methodology

Impacts related to geology and soils were determined by reviewing information contained in the Geotechnical Engineering Investigations prepared for the Master Plan Area, which is provided in Appendix G.

[42] City of Clovis. 2025. Municipal Code, Chapter 8.1, Building Code. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis08/Clovis0801.html. Accessed April 3, 2025.

[43] City of Clovis. 2025. Municipal Code, Chapter 9.110, Subdivision Design and Improvements Requirements. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis09110.html. Accessed April 3, 2025.

[44] City of Clovis. 2025. Municipal Code, Chapter 9.113, Soil Reports. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis09114.html. Accessed April 3, 2025.

[45] City of Clovis. 2025. Municipal Code, Chapter 9.22, Performance Standards. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis09114.html. Accessed April 3, 2025.

[46] City of Clovis. 2025. Municipal Code, Chapter 9.28, Landscaping Standards. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis0928.html. Accessed April 3, 2025.

Additional evaluations of potential geologic and soil impacts of the SOI Expansion Area were based on review of available documentation, including the General Plan and information available from the General Plan EIR and the USGS.

3.7.5 - Thresholds of Significance

The Lead Agency derives its significance criteria based on the questions in the California Environmental Quality Act (CEQA) Guidelines Appendix G Environmental Checklist. Accordingly, impacts to geology and soils would be considered significant environmental effects if the proposed project would:

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 proposed 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.

3.7.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Earthquakes

Impact GEO-1: **The proposed project would not 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.

Impact Analysis

i. Ground Rupture

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, approval of the SOI Expansion would not directly or indirectly cause substantial adverse effects related to ground rupture. Therefore, no impacts would occur.

MP Area 2

As previously discussed, the SOI Expansion Area and, by extension, MP Area 2 are not located within a currently designated Alquist-Priolo Special Study Zone. The closest known fault to MP Area 2 is the Clovis Fault, which extends northwest-southeast from just north of MP Area 2.[47] The Clovis Fault is a pre-Quaternary fault, or fault without recognized Quaternary displacement, and it is not mapped as active.[48] Since there are no known active faults crossing MP Area 2, and the SOI Expansion Area is not located within an Alquist-Priolo Special Study Zone, the risk of ground rupture within MP Area 2 is low; impacts would be less than significant.

Vista Ranch Development/MP Area 1

As previously discussed, MP Area 1 is not located within a currently designated Alquist-Priolo Special Study Zone. The closest known fault to MP Area 1 is the Clovis Fault, which extends northwest-southeast from just north of the Master Plan Area.[49] The Clovis Fault is a pre-Quaternary fault, or fault

[47] California Department of Conservation (DOC), California Geological Survey (CGS). 2015. Fault Activity Map. Website: https://maps.conservation.ca.gov/cgs/fam/. Accessed April 3, 2025.

[48] California Department of Conservation (DOC), California Geological Survey (CGS). 2010. An Explanatory Text to Accompany the fault Activity Map of California. Website: https://www.conservation.ca.gov/cgs/Documents/Melange/FAM_phamplet.pdf. Accessed April 3, 2025

[49] California Department of Conservation (DOC), California Geological Survey (CGS). 2015. Fault Activity Map. Website: https://maps.conservation.ca.gov/cgs/fam/. Accessed April 3, 2025.

without recognized Quaternary displacement, and it is not mapped as active.[50] Since there are no known active faults crossing MP Area 1, and the SOI Expansion Area is not located within an Alquist-Priolo Special Study Zone, the risk of ground rupture within MP Area 1 is low; impacts would be less than significant.

ii) Seismic Ground Shaking

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, approval of the SOI Expansion would not directly or indirectly cause substantial adverse effects related to seismic ground shaking. Accordingly, there would be no impact related to seismic ground shaking with approval of the SOI Expansion.

MP Area 2

Although most of Fresno County is situated within an area of relatively low seismic activity, the faults and fault systems that lie along the eastern and western boundaries of Fresno County, as well as other regional faults, have the potential to produce high-magnitude earthquakes throughout the County.[51] A high-magnitude earthquake on one of these faults could cause moderate intensity ground shaking in Fresno County, including MP Area 2. To reduce potential impacts of seismic ground shaking on the proposed development, development within MP Area 2 would be required to be constructed using standard engineering and seismic safety design techniques of the CBC, as required by Chapter 8.1 of the CMC. Additionally, future development within MP Area 2 would adhere to MM GEO-1a, which requires future development to prepare a site-specific geotechnical investigation and incorporate recommendations into future project design. Each geotechnical investigation would estimate seismic design parameters for its SOI Expansion Area based on site-specific geologic and soil conditions and the types of building occupancies proposed.

Compliance with mandatory CBC requirements and MM GEO-1a would ensure that future development projects are appropriately investigated in terms of potential seismic hazards and that any new buildings and structures are constructed to withstand strong seismic ground shaking. Therefore, impacts would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

As described above, MP Area 1 is not located within an area of high seismic activity and likelihood of strong seismic ground shaking would be relatively low. Additionally, the Vista Ranch Development would be required to be constructed using standard engineering and seismic safety design techniques of the CBC, as required by Chapter 8.1 of the CMC. Furthermore, MM GEO-1b requires

[50] California Department of Conservation (DOC), California Geological Survey (CGS). 2010. An Explanatory Text to Accompany the fault Activity Map of California. Website: https://www.conservation.ca.gov/cgs/Documents/Melange/FAM_phamplet.pdf. Accessed April 3, 2025

[51] Fresno County. 2024. Fresno County, California Hazard Mitigation Plan. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/resources/hazard-mitigation-plan/draft-2024-fresno-county-hazard-mitigation-plan.pdf. Accessed May.

that the proposed project follow all recommendations of the Geotechnical Engineering Investigations and 2024 Geotechnical Feasibility Evaluation prepared for the proposed project. Impacts would be less than significant with mitigation incorporated.

iii) Liquefaction

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the CGS Zones of Required Investigation map does not identify any seismically-induced liquefaction zones in the City or SOI Expansion Area. Accordingly, there would be no impact related to liquefaction with approval of the SOI Expansion.

MP Area 2

Substantial hazards from liquefaction are not expected in areas of the San Joaquin Valley in Fresno County because they are either too coarse or too high in clay content.[52] The CGS Zones of Required Investigation map does not identify any seismically-induced liquefaction zones in the City or SOI Expansion Area.[53] Additionally, the Geotechnical Investigations conclude that the risk of liquefaction within the Master Plan Area is low and liquefaction is not considered a potential hazard.[54,55] Therefore, the probability of soil liquefaction taking place in MP Area 2 is considered a low hazard due to the composition of on-site soils and distance from active fault zones, resulting in a less than significant impact.

Vista Ranch Development/MP Area 1

As discussed above, substantial hazards from liquefaction are not expected in areas of the San Joaquin Valley in Fresno County because they are either too coarse or too high in clay content. The CGS Zones of Required Investigation map does not identify any seismically-induced liquefaction zones in the City or SOI Expansion Area, and the Geotechnical Investigations determined that the risk of liquefaction is low. [56,57] Therefore, the probability of soil liquefaction occurring within MP Area 1 is considered a low hazard due to the composition of on-site soils and distance from active fault zones, resulting in a less than significant impact.

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[52] Fresno County. 2024. Fresno County, California Hazard Mitigation Plan. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/resources/hazard-mitigation-plan/draft-2024-fresno-county-hazard-mitigation-plan.pdf. Accessed May.

[53] California Department of Conservation (DOC), California Geological Survey (CGS). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

[54] Krazan & Associates, Inc. 2021. Geotechnical Engineering Investigation Proposed Residential Development, Behymer and Armstrong Avenues, Clovis, California. March 10.

[55] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

[56] Krazan & Associates, Inc. 2021. Geotechnical Engineering Investigation Proposed Residential Development, Behymer and Armstrong Avenues, Clovis, California. March 10.

[57] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

iv) Landslides

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the SOI Expansion Area is essentially flat; therefore, the potential for a landslide in the SOI Expansion Area is low to non-existent. Accordingly, there would be no impact related to landslides with approval of the SOI Expansion.

MP Area 2

MP Area 2 is essentially flat; therefore, the potential for a landslide in the MP Area 2 is low to non-existent. Some limited potential for slope instability risk could arise during grading and construction activities, where slopes could be over-steepened. However, with adherence to relevant CBC requirements, impacts would be less than significant. Additionally, the CGS Zones of Required Investigation map does not identify any seismically-induced landslide zones in the City or SOI Expansion Area.[58] As a result, the probability of landslides causing substantial adverse effects on people or structures is less than significant.

Vista Ranch Development/MP Area 1

MP Area 1 is essentially flat; therefore, the potential for a landslide in MP Area 1 is low to non-existent. Some limited potential for slope instability risk could arise during grading and construction activities, where slopes could be over-steepened. However, with adherence to relevant CBC requirements, impacts would be less than significant. Additionally, the CGS Zones of Required Investigation map does not identify any seismically-induced landslide zones in the City or SOI Expansion Area.[59] As a result, the probability of landslides causing substantial adverse effects on people or structures is less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact (seismic ground shaking).
Vista Ranch Development/MP Area 1: Potentially significant impact (seismic ground shaking).

Mitigation Measures

MP Area 2

MM GEO-1a Prior to the issuance of grading or building permits, the project applicant shall retain a qualified geotechnical engineer to prepare a site-specific geotechnical investigation consistent with the California Building Standards Code (CBC) and applicable local regulations. The investigation shall evaluate site-specific soil, seismic, and geologic conditions. The geotechnical report shall include design and

[58] California Department of Conservation (DOC), California Geological Survey (CGS). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

[59] California Department of Conservation (DOC), California Geological Survey (CGS). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

construction recommendations to ensure the safety and stability of proposed structures and infrastructure.

All recommendations contained in the approved geotechnical report shall be incorporated into the final project design and implemented during construction. The City of Clovis Engineering and Building Divisions shall verify compliance with the report's recommendations prior to issuance of grading and building permits and during field inspections.

Vista Ranch Development/MP Area 1

MM GEO-1b The recommendations and earthwork specifications included in the Geotechnical Engineering Investigations prepared by Krazan and Associates, Inc. on March 10, 2021, and January 31, 2024, and the Geotechnical Feasibility Evaluation prepared by Krazan & Associates, Inc. on December 7, 2023, and revised January 4, 2024, shall be incorporated into the proposed Vista Ranch Development's design. The final grading plan, construction plans, and building plans shall demonstrate that recommendations set forth in these reports have been incorporated into the final design of the Vista Ranch Development to the satisfaction of the City of Clovis Engineering and Building Divisions.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

Geology and soils concerns are related to risks, hazards, or development constraints that are largely site-specific. However, seismic hazards are regional, and management of seismic hazards is vested with the local planning and building authority. For these reasons, the potential for cumulative geology and soils impacts are considered in the context of the City and its vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The City has several policies related to the health and safety of all people regarding potential seismic impacts. Cumulative projects would be required to be designed in accordance with these standards and policies, which would reduce potential cumulative impacts to less than significant levels.

Additionally, MP Area 2 would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving ground becoming unstable as a result of ground rupture, seismic shaking, liquefaction, and landslides, as described above. In order to minimize potential damage to the buildings and site improvements, all construction in the State is required to be designed in accordance with the latest seismic design standards of the CBC. Future projects

proposed within MP Area 2 would be subject to the City's CEQA review process and would be required to evaluate project-specific impacts at such time as a development proposal, including adherence to MM GEO-1a. As such, the development of the proposed Master Plan would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development/MP Area 1

The City has several policies related to the health and safety of all people regarding potential seismic impacts. Cumulative projects would be required to be designed in accordance with these standards and policies, which would reduce potential cumulative impacts to less than significant levels.

The Vista Ranch Development would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving ground becoming unstable as a result of ground rupture, seismic shaking, liquefaction, and landslides, as described above. In order to minimize potential damage to the buildings and site improvements, all construction in the State is required to be designed in accordance with the latest seismic design standards of the CBC. Furthermore, MM GEO-1b requires that the proposed project follow all recommendations of the Geotechnical Investigations and Geotechnical Feasibility Evaluation. As such, the Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Soil Erosion or Topsoil Loss

Impact GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, a NRCS Custom Soil Survey identified the erosion potential for most soils in the SOI Expansion Area as low to moderate. Furthermore, because the SOI Expansion Area is essentially flat, the erosion potential is slight. Accordingly, there would be no impact related to erosion with approval of the SOI Expansion.

MP Area 2

A NRCS Custom Soil Survey identified the erosion potential for most soils in the Master Plan Area as low to moderate. However, implementation of MP Area 2 would provide for development that would

involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

Future development within MP Area 2 would be evaluated for conformance with the CBC, General Plan, CMC, and other regulations that address construction activities and soil erosion. Each phase of Master Plan construction disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion control and sediment control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, development within the Master Plan would be required to incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Furthermore, MM GEO-1a requires that future development complete site-specific geotechnical evaluations and follow all recommendations contained therein. With implementation of applicable State and City requirements, as well as MM GEO-1a, potential impacts associated with erosion and loss of topsoil would be less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

As discussed above, an NRCS Custom Soil Survey identified the erosion potential for most soils in MP Area 1 as low to moderate. Furthermore, because MP Area 1 is essentially flat, the erosion potential is slight. However, implementation of the proposed Vista Ranch Development would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

The Vista Ranch Development would be evaluated for conformance with the CBC, Clovis General Plan, CMC, and other regulations that address construction activities and soil erosion. The proposed Vista Ranch Development would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion control and sediment control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, the Vista Ranch Development would be required to incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Furthermore, MM GEO-1b requires that the proposed project follow all recommendations of the Geotechnical Engineering Investigations and Geotechnical Feasibility Evaluation, which include site preparation recommendations that would reduce erosion. With implementation of applicable State and City requirements, as well as MM GEO-1b, potential impacts associated with erosion and loss of topsoil would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM GEO-1a.

Vista Ranch Development/MP Area 1

Implement MM GEO-1b.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

Geology and soils concerns are related to risks, hazards, or development constraints that are largely site-specific. The potential for cumulative geology and soils impacts are considered in the context of the City and its vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

A NRCS Custom Soil Survey identified the erosion potential for most soils in the Master Plan Area as low to moderate. Furthermore, because the Master Plan Area is essentially flat, the erosion potential is minimal. However, implementation of the proposed Master Plan would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

Development within MP Area 2, as well as future cumulative projects, would be evaluated for conformance with the CBC, General Plan, CMC, and other regulations that address construction activities and soil erosion. Each phase of Master Plan construction and future cumulative projects disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion control and sediment control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, development within MP Area 2 and future cumulative projects would be

required to incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. With implementation of applicable State and City requirements, potential impacts associated with erosion and loss of topsoil would be less than significant. Furthermore, future projects proposed within MP Area 2 would be subject to the City's CEQA review process and would be required to evaluate project-specific impacts at such time of a development proposal. As such, development of the proposed MP Area 2 would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development Area/MP Area 1

A NRCS Custom Soil Survey identified the erosion potential for most soils in MP Area 1 as low to moderate. Furthermore, because MP Area 1 is essentially flat, the erosion potential is minimal. However, implementation of the Vista Ranch Development would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities that could temporarily increase soil erosion rates during and shortly after project construction. Construction-related erosion could result in the loss of a substantial amount of nonrenewable topsoil and could adversely affect water quality in nearby surface waters.

Development within MP Area 1, as well as future cumulative projects, would be evaluated for conformance with the CBC, General Plan, CMC, and other regulations that address construction activities and soil erosion. Each phase of Vista Ranch Development construction and future cumulative projects disturbing one acre or more of soil would be required to obtain coverage under the Construction General Permit prior to issuance of a grading permit. The Construction General Permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion control and sediment control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation due to potential construction-related pollutants. Further, development within the Master Plan and future cumulative projects would be required to incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. With implementation of applicable State and City requirements, potential impacts associated with erosion and loss of topsoil would be less than significant. As such, development of the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Unstable Geologic Location

Impact GEO-3: **The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, as further explained above, the SOI Expansion Area does not have a significant risk of becoming unstable as a result of a landslide, subsidence, soil collapse, liquefaction, liquefaction-induced settlement, or lateral spreading. Accordingly, there would be no impact related to unstable geologic locations with approval of the SOI Expansion.

MP Area 2

As described above, the Master Plan Area does not have a significant risk of becoming unstable as a result of landslide, subsidence, soil collapse, liquefaction, liquefaction-induced settlement, or lateral spreading. In accordance with Chapter 9.114 of the CMC, future development consistent with the Master Plan must submit a soils report to the City along with a final project map, unless the City Engineer determines that, due to existing available information about the qualities of the soil of the subdivision, no preliminary analysis is necessary. The report would include design recommendations to ensure that conditions do not pose a threat to the health and safety of people or structures, as well as any special precautions required for erosion control. Implementation of the design recommendations would ensure that all on-site fill soils are properly compacted and comply with the applicable safety requirements established by the CBC to reduce risks associated with unstable soils and excavations and fills and that any issues associated with unstable soils are addressed at the design level. If conditions warrant, the City Engineer may also require preparation of a geologic investigation and report. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), adoption of the proposed Master Plan would have a less than significant impact relative to unstable soils.

Vista Ranch Development/MP Area 1

As described above, the Geotechnical Investigations and Geotechnical Feasibility Evaluation identified that MP Area 1 does not have a significant risk of becoming unstable as a result landslide, subsidence, soil collapse, liquefaction, liquefaction-induced settlement, or lateral spreading. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), the proposed Vista Ranch Development would have a less than significant impact relative to unstable soils.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

Geology and soils concerns are related to risks, hazards, or development constraints that are largely site-specific. However, seismic hazards are regional, and management of seismic hazards is vested with the local planning and building authority. For these reasons, the potential for cumulative geology and soils impacts are considered in the context of the City and its vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The Master Plan Area does not have a significant risk of becoming unstable as a result landslide, subsidence, soil collapse, liquefaction, liquefaction-induced settlement, or lateral spreading. In accordance with Chapter 9.114 of the CMC, development consistent with the Master Plan and future cumulative development must submit a soils report to the City along with a final project map, unless the City Engineer determines that, due to existing available information about the qualities of the soil of the subdivision, no preliminary analysis is necessary. The report would include design recommendations to ensure that conditions do not pose a threat to the health and safety of people or structures, as well as any special precautions required for erosion control. Implementation of the design recommendations would ensure that all on-site fill soils are properly compacted and comply with the applicable safety requirements established by the CBC to reduce risks associated with unstable soils and excavations and fills, and that any issues associated with unstable soils are addressed at the design level. If conditions warrant, the City Engineer may also require preparation of a geologic investigation and report. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), the proposed Master Plan would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development/MP Area 1

MP Area 1 does not have a significant risk of becoming unstable as a result landslide, subsidence, soil collapse, liquefaction, liquefaction-induced settlement, or lateral spreading. In accordance with Chapter 9.114 of the CMC, the proposed Vista Ranch Development and future cumulative projects would be required to submit a soils report to the City along with a final project map, unless the City Engineer determines that, due to existing available information about the qualities of the soil of the subdivision, no preliminary analysis is necessary. The report would include design recommendations to ensure that conditions do not pose a threat to the health and safety of people or structures, as well as any special precautions required for erosion control. Implementation of the design recommendations would ensure that all on-site fill soils are properly compacted and comply with the

applicable safety requirements established by the CBC to reduce risks associated with unstable soils and excavations and fills, and that any issues associated with unstable soils are addressed at the design level. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Expansive Soil

Impact GEO-4:	**The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

Approval of the SOI Expansion would not result in physical development, and, as such, no development would be located on expansive soils. Therefore, no impacts would occur.

MP Area 2

Expansive soils are those that undergo volume changes as moisture content fluctuates, generally swelling substantially when wet or shrinking when dry. According to the NRCS Custom Soil Survey, the soils in MP Area 2 generally have a low shrink-swell potential. However, in order to determine the likelihood of expansive soils in MP Area 2, MM GEO-1a would be implemented, which would require a site-specific geotechnical investigation be conducted to determine potential impacts.

In accordance with Chapter 9.114 of the CMC, development within MP Area 2 must submit a soils report to the City along with a final project map, unless the City Engineer determines that, due to existing available information about the qualities of the soil of the subdivision, no preliminary analysis is necessary. The soils report would ensure that the foundations, structures, roadway sections, sidewalks, and other improvements can accommodate the site-specific soils, including expansive soils, at those locations. Compliance with this requirement would occur in accordance with the standards and requirements outlined in the CBC, Title 24, Part 2, Chapter 16, Chapter 17, and Chapter 18, which addresses structural design, tests and inspections, and soils and foundation standards. The final soils reports would include design recommendations to ensure that soil conditions do not pose a threat to the health and safety of people or structures. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), and implementation of

MM GEO-1a, the proposed Master Plan would have a less than significant impact relative to expansive soils.

Vista Ranch Development/MP Area 1

As discussed above, the soils in MP Area 1 generally have a low shrink-swell potential. Additionally, the 2024 Geotechnical Investigation encountered upper soils consisting of silty sand, sandy silt, clayey sand, silty sand/sandy silt, and clayey sand.[60] The 2024 Geotechnical Investigation indicates that the clayey soils appeared to have a low to moderate swell potential. Further, MM GEO-1b requires that the proposed project follow all recommendations of the Geotechnical Investigations and Geotechnical Feasibility Evaluation, which would address potential impacts related to expansive soils. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC) and implementation of MM GEO-1b, the proposed Vista Ranch Development would have a less than significant impact relative to expansive soils.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM GEO-1a.

Vista Ranch Development/MP Area 1

Implement MM GEO-1b.

Level of Significance Before Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

Geology and soils concerns are related to risks, hazards or development constraints that are largely site-specific. The potential for cumulative geology and soils impacts are considered in the context of the SOI Expansion Area and its vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

[60] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

MP Area 2

Compliance with the CBC and with Chapter 9.114 of the CMC, which requires projects to submit soils reports and incorporate any recommendations included would reduce potential impacts of cumulative development to less than significant levels.

As described above, the Master Plan Area's clayey soils have a low to moderate swell potential. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), the proposed Master Plan would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development/MP Area 1

Compliance with the CBC and with Chapter 9.114 of the CMC, which requires projects to submit soils reports and incorporate any recommendations included would reduce potential impacts of cumulative development to less than significant levels.

As described above, MP Area 1's clayey soils have a low to moderate swell potential. Through compliance with applicable laws, standards, and guidelines (including the CBC and CMC), as well as implementation of MM GEO-1b, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Wastewater Disposal Systems

Impact GEO-5:	**The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. There are no new residences proposed in the Non-development Area, and no new septic systems would be installed. As such, no impact would occur.

MP Area 2

Septic tanks or septic systems are not proposed as part of the proposed Master Plan and would not be installed to serve the Master Plan. MP Area 2 would be served by a new connection to the City's

wastewater collection system installed within proposed public utilities easements. The proposed wastewater conveyance facilities would connect to the existing sewer main lines. As such, no impact would occur.

Vista Ranch Development/MP Area 1

Septic tanks or septic systems are not proposed as part of the proposed Vista Ranch Development and would not be installed to serve the Vista Ranch Development. MP Area 1 would be served by a new connection to the City's wastewater collection system installed within proposed public utilities easements. The proposed wastewater conveyance facilities would connect to the existing sewer main lines. As such, no impact would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to any of the City's thresholds related to wastewater disposal systems as a result of the proposed project. Accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Destruction of Paleontological Resource or Unique Geologic Feature

Impact GEO-6:	**The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Since there are no development proposals associated with the SOI Expansion in the Non-development Area, determining potential paleontological impacts is too speculative. Therefore, no impacts would occur.

MP Area 2

The proposed Master Plan would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources, resulting in a potentially significant impact. As such, implementation of MM GEO-6 would ensure steps are taken to reduce impacts to paleontological resources if they are discovered during construction activities, including stopping work in the event potential resources are found, evaluation of the resource by a qualified Paleontologist, and appropriate handling of any potential resource. Implementation of MM GEO-6 would reduce this impact to a less than significant level.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources. MP Area 1 has generally undergone extensive previous grading and is not anticipated to directly or indirectly impact previously undiscovered paleontological resources; however, there remains a potential for excavation activities to encounter paleontological resources, resulting in a potentially significant impact. As such, implementation of MM GEO-6 would ensure steps are taken to reduce impacts to paleontological resources if they are discovered during construction activities, including stopping work in the event potential resources are found, evaluation of the resource by a qualified Paleontologist, and appropriate handling of any potential resource. Implementation of MM GEO-6 would reduce this impact to a less than significant level.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM GEO-6 Prior to approval of a grading permit, the City shall verify that grading and improvement plans are notated with the following requirement: “If any paleontological resources are found during grading and construction activities of the proposed project, all work shall be halted immediately within a 200-foot radius of the discovery until a qualified Paleontologist has evaluated the find. Work shall not continue at the discovery site until the Paleontologist evaluates the find and makes a determination regarding the significance of the resource and identifies recommendations for conservation of the resource, including preserving in place or relocating on the SOI Expansion Area, or collecting the resource and documenting the find with the University of California Museum of Paleontology.”

Level of Significance After Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

Geology and soils concerns are related to risks, hazards or development constraints that are largely site-specific. However, seismic hazards are regional, and management of seismic hazards is vested with the local planning and building authority. For these reasons, the potential for cumulative geology and soils impacts are considered in the context of the City and its vicinity.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects within the City would have the potential to impact paleontological resources within the City and its vicinity. However, the City is in an area of low or undetermined paleontological sensitivity. Additionally, cumulative projects would be required to undergo CEQA evaluation and mitigate any potential impacts on a project-by-project basis. Therefore, cumulative impacts would be less than significant.

The proposed Master Plan would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources. As such, there is the potential for Master Plan excavation activities to encounter paleontological resources, resulting in a potentially significant impact. However, future development in MP Area 2 would be required to implement MM GEO-6, which would ensure steps are taken to reduce impacts to paleontological resources, if they are discovered during construction activities, including stopping work in the event potential resources are found, evaluation of the resource by a qualified Paleontologist, and appropriate handling of any potential resource. Implementation of MM GEO-6 would reduce project-specific impacts to a less than significant level. As such, the Master Plan would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Vista Ranch Development/MP Area 1

Cumulative projects within the City would have the potential to impact paleontological resources within the City and its vicinity. However, the City is in an area of low or undetermined paleontological sensitivity. Additionally, cumulative projects would be required to undergo CEQA evaluation and mitigate any potential impacts on a project-by-project basis. Therefore, cumulative impacts would be less than significant.

The proposed Vista Ranch Development would provide for development that would involve some land clearing, mass grading, and other ground-disturbing activities with the potential to result in the accidental destruction or disturbance of paleontological resources. As such, there is the potential for excavation activities to encounter paleontological resources, resulting in a potentially significant impact. However, the proposed Vista Ranch Development would implement MM GEO-6, which would

ensure steps are taken to reduce impacts to paleontological resources if they are discovered during construction activities. Implementation of MM GEO-6 would reduce project-specific impacts to a less than significant level. As such, the Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.8 - Greenhouse Gas Emissions

3.8.1 - Introduction

This section describes the existing greenhouse gas (GHG) emissions setting and potential effects from project implementation in the Sphere of Influence (SOI) Expansion Area and its surrounding area. Descriptions and analysis in this section are based on project-specific information and modeling results utilizing California Emissions Estimator Model (CalEEMod) Version 2022.1, where applicable. (See Appendix D)

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to GHG emissions.

- Comment stating that a lack of sufficient school funding may impact various environmental issues, including Vehicle Miles Traveled (VMT) and GHG emissions.[1]
- Comment suggesting that the City of Clovis (City) consider incorporating solar power systems as an emission reduction strategy for the proposed project. (p. 3.8-25)
- Comment requesting that the Revised Draft EIR include air quality and GHG emissions analysis that considers impacts to the City of Fresno. (p. 3.8-29)
- Comment requesting that the Revised Draft EIR thoroughly disclose, analyze, and mitigate the proposed project's anticipated GHG emissions. (p. 3.8-25)

3.8.2 - Environmental Setting

Greenhouse Effect, Global Warming, and Climate Change

Earth's temperature is rising,[2] and although the global climate has varied over the long-range time scale, there is strong scientific consensus that the rapid heating in recent decades is both unusual and caused by GHG emissions from human activities such as the burning of fossil fuels including coal and oil.[3] Gases that trap heat in the atmosphere are referred to as GHGs. The effect is analogous to

[1] This comment addresses a topic outside the scope of CEQA and does not pertain to the evaluation of environmental impacts; therefore, no further response is required. The California Government Code significantly limits the application of CEQA with respect to school impact issues. The fees set forth in California Government Code Section 65996 constitute the exclusive means of both "considering" and "mitigating" a project's impacts on school facilities. Moreover, these fees are "deemed to provide full and complete school facilities mitigation" (Govt Code §65996(b)). Because the statute states that the statutory fees are the exclusive means of considering as well as mitigating impacts on school facilities, it limits not only the mitigation that may be required but also the scope of impact review in a project's EIR and the lead agency's findings on those impacts. See, e.g., *Chawanakee Unified Sch. Dist. v County of Madera* (2011) 196 CA4th 1016.

[2] National Centers for Environmental Information (NCEI) National Oceanic and Atmospheric Administration (NOAA). 2025. Global Time Series. Website: https://www.ncei.noaa.gov/access/monitoring/climate-at-a-glance/global/time-series. Accessed November 4, 2025.

[3] K. Myers, et al. Consensus Revisited: Quantifying scientific agreement on climate change and climate expertise among

the way a greenhouse retains heat. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, chlorofluorocarbons, and sulfur hexafluoride. Atmospheric concentrations of CO_2, the most prominent GHG, have been increasing rapidly in recent decades from approximately 280 parts per million (ppm) before the start of the Industrial Revolution in the 1760s to more than 400 ppm as of 2013.[4] According to the Intergovernmental Panel on Climate Change (IPCC), it is *extremely unlikely* that global climate change of the past 50 years can be explained without the contribution from human activities.

As the concentration of these gases continues to increase in the atmosphere, Earth's temperature has increased by about 1.2 to 1.4°F (degrees Fahrenheit) since 1900.[5] Even if GHG emissions could be reduced to zero overnight, global temperatures would continue to rise in future years due to the build-up of GHGs that have already accumulated in the atmosphere and the oceans. As future emissions increase the atmospheric concentrations of CO_2 and other GHGs, the impacts of the warming greenhouse effect are projected to steadily worsen.

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact. Therefore, this section discusses the proposed project's contribution to the cumulative GHG impact.

Greenhouse Gases

Greenhouse Gases and Global Emission Sources

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of GHGs that contribute to global warming or global climate change have a broader, global impact. Global warming is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. Prominent GHGs that naturally occur in Earth's atmosphere are water vapor, CO_2, CH_4, oxides of nitrogen (NO_X), and ozone. Anthropogenic (human-caused) GHG emissions include releases of these GHGs plus release of human-made gases with high global warming potential (GWP) (ozone-depleting substances such as chlorofluorocarbon [CFC])[6] and aerosols, hydrofluorocarbon (HFC), perfluorocarbon (PFC), and sulfur hexafluoride (SF_6). The GHGs listed by the IPCC (CO_2, methane, N_2O, HFCs, PFCs, and SF_6) are discussed below, in order of abundance in the atmosphere.

Earth scientists 10 years later. Environmental Research Letters Vol.16 No. 10, 104030 (20 October 2021). https://doi.org/10.1088/1748-9326/ac2774.

[4] Global Monitoring Library, National Oceanic and Atmospheric Administration (NOAA). 2024. Trends in CO_2, CH_4, N_2O, SF_6. Website: https://gml.noaa.gov/ccgg/trends/. Accessed November 4, 2025.

[5] National Aeronautics and Space Administration (NASA). 2024. World of Change: Global Temperatures. Website: https://earthobservatory.nasa.gov/world-of-change/global-temperatures. Accessed November 4, 2025.

[6] CFCs destroy stratospheric ozone. The Montreal Protocol on Substances that Deplete the Ozone Layer prohibited CFCs production in 1987.

GWP is the potential of a gas or aerosol to trap heat in the atmosphere. The GWP of a gas is essentially a measurement of the radiative forcing of a GHG compared with the reference gas, CO_2.

Individual GHG compounds have varying potential for contributing to global warming. For example, CH_4 is 25 times as potent as CO_2, while SF_6 is 22,200 times more potent than CO_2 on a molecule-per-molecule basis. To simplify reporting and analysis, methods have been set forth to describe emissions of GHGs in terms of a single gas. The most commonly accepted method for comparing GHG emissions is the GWP methodology defined in the IPCC reference documents.[7] The IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalents (CO_2e), which compares the gas in question to that of the same mass of CO_2 (by definition, CO_2 has a GWP of 1). The GWP of a GHG is a measure of how much a given mass of a GHG is estimated to contribute to global warming. Thus, to describe how much global warming a given type and amount of GHG may cause, the CO_2e is used. A CO_2e is the mass emissions of an individual GHG multiplied by its GWP. As such, a high GWP represents high absorption of infrared radiation and a long atmospheric lifetime compared to CO_2. One must also select a time horizon to convert GHG emissions to equivalent CO_2 emissions to account for chemical reactivity and lifetime differences among various GHG species. The standard time horizon for climate change analysis is 100 years. Generally, GHG emissions are quantified in terms of metric tons (MT) of CO_2e (MT CO_2e) emitted per year.

The atmospheric residence time of a gas is equal to the total atmospheric abundance of the gas divided by its rate of removal.[8] The atmospheric residence time of a gas is, in effect, a half-life measurement of the length of time a gas is expected to persist in the atmosphere when accounting for removal mechanisms such as chemical transformation and deposition.

Table 3.8-1 lists the GWP of each GHG and its lifetime. Units commonly used to describe the concentration of GHGs in the atmosphere are ppm, parts per billion (ppb), and parts per trillion (ppt), referring to the number of molecules of the GHG in a sampling of 1 million, 1 billion, or 1 trillion molecules of air. Collectively, HFCs, PFCs, and sulfur hexafluoride are referred to as high GWP gases. CO_2 is by far the largest component of worldwide CO_2e emissions, followed by CH_4, N_2O, and high GWP gases, in order of decreasing contribution to CO_2e.

The primary human processes that release GHGs include the burning of fossil fuels for transportation, heating, and electricity generation; agricultural practices that release methane, such as livestock grazing and crop residue decomposition; and industrial processes that release smaller amounts of high GWP gases. Deforestation and land cover conversion have also been identified as contributing to global warming by reducing Earth's capacity to remove CO_2 from the air and altering Earth's albedo or surface reflectance, thus allowing more solar radiation to be absorbed. Specifically, CO_2 emissions associated with fossil fuel combustion are the primary contributors to human-induced climate change.

[7] United Nations Intergovernmental Panel on Climate Change, United Nations. 2007. Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the IPCC. Geneva, Switzerland.

[8] Seinfeld, J.H. and S.N. Pandis. 2006. Atmospheric Chemistry and Physics: From Air Pollution to Climate Change, Second Edition. New York, NY: John Wiley & Sons.

CO_2, CH_4, and N_2O emissions associated with human activities are the next largest contributors to climate change.

GHGs of California concern are defined by California Assembly Bill (AB) 32 (see the Regulatory Environment subsection below for a description) and include CO_2, CH_4, NO_X, HFCs, PFCs, and SF_6. A seventh GHG, nitrogen trifluoride (NF_3), was also added under the California Health and Safety Code Section 38505(g)(7) as a GHG of concern. These GHGs are described in terms of their physical description and properties, GWP, atmospheric residence lifetime, sources, and atmospheric concentration in Table 3.8-1.

Table 3.8-1: Description of Greenhouse Gases of California Concern

Greenhouse Gas	Physical Description and Properties	Global Warming Potential (100 years)	Atmospheric Residence Lifetime (years)	Sources
Carbon dioxide (CO_2)	Odorless, colorless, natural gas.	1	50–200	burning coal, oil, natural gas, and wood; decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; oceanic evaporation; volcanic outgassing; cement production; land use changes.
Methane (CH_4)	Flammable gas and is the main component of natural gas.	25	12	geological deposits (natural gas fields) extraction; landfills; fermentation of manure; decay of organic matter.
Nitrous oxide (N_2O)	Nitrous oxide (laughing gas) is a colorless GHG.	298	114	microbial processes in soil and water; fuel combustion; industrial processes.
Chlorofluorocarbons (CFCs)	Nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (level of air at Earth's surface); formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms.	3,800–8,100	45–640	refrigerants aerosol propellants; cleaning solvents.

Greenhouse Gas	Physical Description and Properties	Global Warming Potential (100 years)	Atmospheric Residence Lifetime (years)	Sources
Hydrofluorocarbons (HFCs)	Synthetic human-made chemicals used as a substitute for CFCs and contain carbon, chlorine, and at least one hydrogen atom.	140–11,700	1–50,000	automobile air conditioners; refrigerants.
Per-fluorocarbons (PFCs)	Stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface.	6,500–9,200	10,000–50,000	primary aluminum production; semiconductor manufacturing.
Sulfur hexafluoride (SF_6)	Human-made, inorganic, odorless, colorless, and nontoxic, nonflammable gas.	22,800	3,200	electrical power transmission equipment insulation; magnesium industry, semiconductor manufacturing; a tracer gas.
Nitrogen trifluoride (NF_3)	Inorganic, is used as a replacement for PFCs, and is a powerful oxidizing agent.	17,200	740	electronics manufacture for semiconductors and liquid crystal displays.

Sources: United Nations Intergovernmental Panel on Climate Change (IPCC). 2007. Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change (Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor and H.L. Miller [eds.]). Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. Website: http://www.ipcc.ch /publications_and_data/ar4/wg1/en/contents.html. Accessed June 2025.
United Nations Intergovernmental Panel on Climate Change (IPCC). 2007. Climate Change 2007: Synthesis Report. Contribution of Working Groups I, II and III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change (Core Writing Team, Pachauri, R.K. and Reisinger, A. [eds.]). IPCC, Geneva, Switzerland. Website: http://www.ipcc.ch/publications_ and_data/ar4/syr/en/contents.html. Accessed June 2025.

Global Climate Change Issue

Climate change is a global problem because GHGs are global pollutants, unlike criteria air pollutants and hazardous air pollutants (also called toxic air contaminants [TACs]), which are pollutants of regional and local concern. Pollutants with localized air quality effects have relatively short atmospheric lifetimes, approximately 1 day; by contrast, GHGs have long atmospheric lifetimes, several years to several thousand years. GHGs persist in the atmosphere for a long enough time to be dispersed around the globe.

Although the exact lifetime of any particular GHG molecule depends on multiple variables and cannot be pinpointed, more CO_2 is currently emitted into the atmosphere than is sequestered. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through photosynthesis and dissolution, respectively. These are two of the most common processes of CO_2 sequestration. Of the total annual human-caused CO_2 emissions, approximately 54 percent is sequestered through ocean uptake, forest regrowth (primarily in the Northern Hemisphere), and other terrestrial sinks within a year, whereas the remaining 46 percent of human-caused CO_2 emissions is stored in the atmosphere.[9]

Similarly, effects of GHGs are borne globally, as opposed to the localized air quality effects of criteria air pollutants and hazardous air pollutants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known and cannot be quantified, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global or local climates or microclimate.

Emissions of GHGs have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. A cumulative discussion and analysis of project impacts on global climate change is presented in this Revised Draft EIR because, although no single project will contribute significantly to climate change, cumulative emissions from many projects affect global GHG concentrations and the climate system.

Statewide Climate Impacts

Impacts from increased temperatures are expected to result in more extreme weather, increased wildfire events, and sea level rise. As reported in the California Fourth Climate Change Assessment (2018),[10] California has seen a trend of increased average temperatures, more extreme hot days, fewer cold nights, longer growing seasons, less winter snow, and earlier snowmelt and rainwater runoff. According to updated records from the National Oceanic and Atmospheric Administration (NOAA) and the California Office of Environmental Health Hazard Assessment (OEHHA), the Statewide average temperature increased by approximately 2.5°F from 1895 to 2020.[11] A larger proportion of total precipitation is falling as rain instead of snow. Sea level rose by as much as 7 inches along the California coast over the last century, leading to increased erosion and adding pressure to the State's infrastructure, water supplies, and natural resources. Within the past decade, California has experienced multiple extreme climate events, including the 2012–2016 drought, a dramatic reduction in Sierra Nevada winter snowpack, forest fires, and back-to-back years of record-setting heat in 2014 and 2015.

[9] Seinfeld, J. H., and S.N. Pandis. 1998. Atmospheric Chemistry and Physics from Air Pollution to Climate Change. John Wiley & Sons.

[10] California Natural Resources Agency (CNRA). 2018. California's Fourth Climate Change Assessment: Statewide Summary Report. Website: https://climateassessment.ca.gov/state/ Accessed April 29, 2025.

[11] California Office of Environmental Health Hazard Assessment (OEHHA). 2022. Indicators of Climate Change in California. Website: https://oehha.ca.gov/climate-change. Accessed April 29, 2025.

Local and Regional Climate Impacts

The San Joaquin Valley Area, where the SOI Expansion Area is located, has experienced similar trends as the rest of California. The San Joaquin Valley's annual average maximum temperatures increased by 1°F (0.6 °C [degrees Celsius]) over a recent 30-year period.[12]

Climate change is already affecting the San Joaquin Valley's communities and agriculture. These observed trends in the Valley are expected to continue in the future:

- **Substantial increases in temperatures and more extreme hot days.** Annual average maximum temperatures are projected to increase 4°F to 5°F by midcentury, and 5°F to 8°F by the end of the century. If emissions continue to rise at high rates, projections indicate that half of the San Joaquin Valley counties will have average annual maximum temperatures over 80°F by the end of the century, which is more than an 8°F increase compared to historical conditions.[13]
- **More precipitation extremes, more rain and less snow.** Precipitation will likely be more intense, increasing the fraction of precipitation falling from November to March from 75 percent (current conditions) to 80 percent (by the end of the century). This translates into longer dry seasons with 20 percent less precipitation on average that may lead to increased groundwater pumping to compensate the diminished surface water supplies.[14]
- Snowpack in the Sierra Nevada has served as an essential water storage in the San Joaquin Valley, providing water during the drier season. However, snowpack is gradually decreasing at high elevations and is projected to become scant at lower elevations by the end of the century.
- As temperature increases, earlier snowmelt will shift peak flows by 2 to 4 months by the end of the century. This shift may reduce surface water storage, increasing the mismatch between when the water is available (winter/spring) and when most of the water is used (summer).
- **Sea level rise.** Sea level rise increases flooding risk in Delta communities and San Joaquin County cities such as Stockton, threatening over 10,000 people. Over the past 100 years, sea level has risen 8 inches, and it could rise 2 feet by midcentury and 3.5 feet by the end of the century.
- **Increased frequency of wildfires.** Warming and greater precipitation extremes are increasing wildfires in California. Wildfires pose immediate threats to residents living in fire-prone areas, including burns and smoke inhalation, as well as secondary impacts to people further away from traveling smoke, such as asthma and respiratory irritation.[15]

[12] California Governor's Office of Land Use and Climate Innovation (LCI). 2022. San Joaquin Valley Region Report for California's Fourth Climate Change Assessment. Website: https://www.energy.ca.gov/sites/default/files/2022-01/CA4_CCA_SJ_Region_Eng_ada.pdf. Accessed April 21, 2025.

[13] Ibid.

[14] Ibid.

[15] California Governor's Office of Land Use and Climate Innovation (LCI)). 2022. San Joaquin Valley Region Report for California's Fourth Climate Change Assessment. Website: https://www.energy.ca.gov/sites/default/files/2022-01/CA4_CCA_SJ_Region_Eng_ada.pdf. Accessed April 21, 2025.

- **Exacerbation of air quality problems and impacts on public health.** Extreme heat days are projected to increase for all San Joaquin Valley counties from current 4 or 5 extreme heat days per year to about 18 to 28 days toward midcentury, and about 24 to 68 days toward the end-of-century.[16] More extreme heat days correlate with higher ozone levels, leading to respiratory issues, heat-related illnesses, and increased vector-borne diseases**.**
- **Higher temperatures and impacts on Valley Fever.** Valley fever cases are more common in the San Joaquin Valley than in the rest of California, and this poorly studied illness could be exacerbated by the intensified combination of wetter conditions that allow the fungus to reproduce, and drier, windy periods that contribute to the spread of the spores from the soil into people's respiratory systems (dust storms). Current health services are insufficient, and climate change is increasing the necessity of emergency attention.[17]

While the impacts are felt locally, climate change is a global issue because GHGs are global pollutants. Pollutants with localized air quality effects, including criteria air pollutants and TACs, have relatively short atmospheric lifetimes (approximately 1 day) and generally do not travel greatly beyond their point of emission. By contrast, GHGs have long atmospheric lifetimes, ranging from several years to several thousand years. GHGs persist in the atmosphere for a long enough time to be dispersed around the globe, cumulatively combining to cause a global climate effect.

California Greenhouse Gas Emissions Inventory

California contributed GHG emissions of 375.1 million metric tons (MMT) of CO_2e into the atmosphere in 2023.[18] Anthropogenic CO_2 is largely the byproduct of fossil fuel combustion and attributable to transportation, industry/ manufacturing, electricity generation, natural gas consumption, and agriculture processes. In California, the transportation sector is the largest emitter at approximately 37.8 percent of GHG emissions, followed by the industrial sector at approximately 19.6 percent of GHG emissions.

3.8.3 - Regulatory Framework

The following section describes federal, State, regional, and local regulations and policies that are specific to reducing GHG emissions and applicable to the proposed project.

Federal

The United States Environmental Protection Agency (EPA) is the governing body responsible for regulating air pollution in the United States and setting nationwide air quality and emissions standards. The EPA adopts and implements several regulations to reduce GHG emissions as well.

[16] California Governor's Office of Land Use and Climate Innovation (LCI)). 2022. San Joaquin Valley Region Report for California's Fourth Climate Change Assessment. Website: https://www.energy.ca.gov/sites/default/files/2022-01/CA4_CCA_SJ_Region_Eng_ada.pdf. Accessed April 21, 2025.

[17] Ibid.

[18] California Air Resources Board (ARB). 2024. Current California GHG Emission Inventory Data 2000–2022. Website: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed June 19, 2025

These include GHG emission reduction standards for passenger cars and light-duty trucks, heavy-duty trucks (including buses), commercial aircraft and large business jets, heavy equipment (with spark-ignition engines and compression-ignition diesel engines), locomotives, marine vessels, recreational vehicles, and small equipment/tools.

California has implemented more stringent GHG emissions reduction regulations on the same sources listed above (excluding commercial aircraft and large business jets). Key State-level regulations are discussed below.

State

California has been on the forefront of regulating GHG emissions to address climate change through a variety of far-reaching and broad GHG legislation and executive orders. The following section outlines the major legislative pieces governing climate change in the State. These major pillars of legislation are supported by numerous other legislative actions, which are detailed in the supporting measures of their scoping plans. Other regulations such as the California Building Standards Code (CBC) and Energy Standards also indirectly reduce GHG emissions.

Major Legislative Actions to Reduce GHGs

The State of California legislature has enacted a series of bills that constitute the most aggressive program to reduce GHGs of any state in the nation. Some legislation, such as the landmark AB 32 California Global Warming Solutions Act of 2006, was specifically enacted to address GHG emissions. This was followed by a series of other executive orders, ABs, and senate bills (SBs) that set GHG policies for the State. The current framework and future goals are supported by three major pieces of legislation.

Key Targets:

- AB 32: Reduce GHG emissions to 1990 levels by 2020.
- SB 32: Reduce GHG emissions 40 percent below 1990 levels by 2030.
- AB 1279: Achieve net-zero GHG emissions by 2045 and net-negative emissions.

To achieve these State-mandated emissions reduction targets, a document known as the Scoping Plan was required to be created by the California Air Resources Board (ARB) beginning in 2007 and be updated at least once every 5 years to “ensure the GHG emissions reduction activities to be adopted and implemented by the state board are complementary, nonduplicative, and can be implemented in an efficient and cost-effective manner.” The Scoping Plan outlines strategies across nearly all levels of California’s government and economy and defines—at a granular level—the regulatory actions needed to reduce GHG emissions from all economic sectors to meet the targets. While the Scoping Plan itself is not legally binding, the regulations and measures it recommends can lead to the creation of binding rules and regulations that must be followed by various sectors and entities within the State. These regulations are enforced by the ARB and other relevant agencies to ensure compliance with California's climate goals.

2022 Scoping Plan

The 2022 Scoping Plan addresses the target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. It lays out a plan based on bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the State's natural and working lands and using a variety of mechanical approaches. The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on, and accelerating, carbon reduction programs that have been in place for a decade and a half. The plan calls for a rapid transition to zero-emission transportation; phasing out the use of fossil gas used for heating homes and buildings; development of sustainable transportation alternatives to reduce reliance on cars; and clamping down on use of chemicals and refrigerants with high GWP. The plan also identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.

The 2022 Scoping Plan reaffirms and clarifies the role of local governments in achieving the State's climate goals, particularly as it concerns the approval of new land use development projects and their environmental review under the California Environmental Quality Act (CEQA). It encourages local governments to adopt a CEQA-qualified Climate Action Plan (CAP) addressing three priority areas: (1) transportation electrification, (2) VMT reduction, and (3) building decarbonization. By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction. Local governments that prepare qualified CAPs that include strategies in these areas are contributing to alignment between local climate action and the State's climate goals.

Statewide Initiatives and Regulations

The ARB also manages the cap-and-trade program to achieve GHG emission reductions from large industrial facilities. The ARB has pioneered a range of approaches in California that have set the standard for effective air and climate programs for the nation and the world. The ARB regulations, based on extensive research and established science, have driven innovation, leading to significant technological developments such as the production of low- and zero-emission cars and trucks and cleaner fuels. As stated, ARB is tasked by the legislature with updating the Scoping Plan, which was most recently adopted in 2022 (2022 Scoping Plan), to ensure the State carries out actions to meet the 2030 and 2045 GHG emissions reduction targets.

Other State agencies responsible for regulating GHGs include:

- **California Energy Commission (CEC):** The State's energy policy and planning agency, responsible for climate change related programs including energy efficiency and leading the State to a 100 percent clean energy reality. The CEC mandates building energy efficiency standards (in new and existing buildings) and manages the Renewable Portfolio Standard (RPS).
- **California Department of Resources Recycling and Recovery (CalRecycle):** California's recycling and waste management agency, responsible for implementation of State climate policies including landfill methane emissions reduction, waste-to-energy production, and

composting requirements. CalRecycle implements food and yard waste recycling regulations, including mandates to cut organic waste disposal 75 percent by 2025.

- **California Governor's Office of Land Use and Climate Innovation (LCI):** The LCI is California's long-range planning agency, responsible for implementing CEQA review and conducting Statewide research on all climate change policies and impacts.

As a result of these actions, California reached its 2020 GHG emissions reduction target of reducing GHG emissions back to 1990 levels 4 years early and is on track to meet the 2030 GHG reduction target. Below is a summary of State regulations that are applicable to the proposed project and will serve to reduce GHG emissions now and in the future to ensure California stays on the path to meeting the State-mandated 2030 and 2045 targets:

- **Advanced Clean Cars II (ACC II)**: Designed to reach 100 percent new vehicle Zero-Emission Vehicles (ZEVs) and clean plug-in hybrid-electric vehicles (PHEVs) in California by the 2035 model year.
- **Advanced Clean Trucks**: Requires increasing percentages of manufacturer sales of on-road medium- and heavy-duty vehicles to be ZEVs to reduce emissions of criteria pollutants, TACs, and GHGs. However, as of January 2025 the EPA has taken steps to rescind the waivers granted for implementation of this regulation.
- **Small Off-road Engine (SORE) Regulations:** Transition 100 percent of small off-road spark-ignition engines (at or below 25.5 horsepower and used in non-stationary equipment), which includes landscaping equipment, to zero-emission by 2035 (where feasible).[19]
- **Zero-Emission Forklifts:** The regulation will achieve emission reductions of both criteria pollutants and GHGs by requiring the phase-out of forklifts using large spark-ignition (LSI) engines, such as those running on propane and gasoline.[20] The regulation is expected to result in a significant shift of the forklift segment in California to zero-emission technology.
- **Low Carbon Fuel Standard:** Increase the availability and use of low carbon fuels, including renewable diesel, biodiesel, renewable and natural gas by mandating that the fuel carbon intensity in California must achieve a 20 percent reduction by 2030[21].
- **Renewable Portfolio Standard:** One of California's key programs for advancing renewable energy, it sets continuously escalating renewable energy procurement requirements for the State's load-serving entities. All entities must procure 60 percent of their electricity portfolio from renewable energy resources by 2030.

[19] California Air Resources Board (ARB). 2024. SORE–Small Engine Fact Sheet. Website: https://ww2.arb.ca.gov/resources/fact-sheets/sore-small-engine-fact-sheet. Accessed April 17, 2025.

[20] California Air Resources Board (ARB). 2024. Zero-Emission Forklifts. Website: https://ww2.arb.ca.gov/our-work/programs/zero-emission-forklifts. Accessed April 17, 2025.

[21] California Air Resources Board (ARB). 2024. Low Carbon Fuel Standard. Website: https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about. Accessed April 17, 2025.

- **Building Energy Efficiency Standards–Title 24, Part 6 (Energy Code):** Contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings; the requirements have gradually increased in efficiency and technology over the past decades. The current standard, known as the 2022 Energy Code, builds on California's technological innovations, and includes encouraging heat pumps, requiring electric-ready single-family homes, and solar/battery storage standards for various building types. The 2022 Energy Code also strengthens ventilation standards to improve indoor air quality.
- **California Green Building Standards Code–Title 24, Part 11 (CALGreen):** Mandatory green building standards code for the State with the goal of reducing GHG emissions from buildings.
- **Model Water Efficient Landscape Ordinance:** The Model Water Efficient Landscape Ordinance (Ordinance) was required by AB 1881 Water Conservation Act. The bill required local agencies to adopt a local landscape Ordinance at least as effective in conserving water as the Model Ordinance by January 1, 2010. Reductions in water use of 20 percent consistent with (SBX-7-7) 2020 mandate are expected under the Ordinance. New development projects that include landscaped areas of 500 square feet or more are subject to the Ordinance. The Ordinance requires measures such as: more efficient irrigation systems, incentives for graywater usage, improvements for on-site stormwater capture, and limiting high-water use plants in landscaping.

Residential Building Standards Moratorium (2025–2031)

AB 130, enacted in July 2025, imposes a 6-year moratorium (from June 1, 2025, to June 1, 2031) on the adoption or modification of State and local building standards affecting residential construction, with limited exceptions. During the moratorium, the California Building Standards Commission (CBSC) and local jurisdictions are prohibited from implementing new residential code updates unless they address urgent health and safety concerns or wildfire resilience.

California GHG Policy and GHG Reduction Planning

Development results in a large portion of GHG emissions and the State cannot directly regulate the control of emissions from development at this level. As such, State and local governments are strongly urged to implement measures and plans to locally control and reduce GHG in alignment with the State's plans, by developing and adopting a local GHG Reduction Plan. A "qualified" reduction strategy capable of being utilized for a streamlined or tiered analysis under CEQA must meet the following requirements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.

- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendments if the plan is not achieving specified levels.
- Be adopted in a public process following environmental review.

A project which can show compliance with a local "qualified" GHG plan that addresses the 2030 goals of SB 32 would be consistent with its goals and can streamline its compliance determination with GHG regulations and policies. Similarly, projects that comply with "qualified" GHG reduction plans aligned with both SB 32 and AB 1279 goals would be considered consistent with all State planning goals.

Absent consistency with an adequate, geographically specific GHG reduction plan such as a CEQA-qualified CAP, the Scoping Plan outlines three distinct approaches that lead agencies may consider for evaluating the consistency of proposed plans and residential and mixed-use development projects with the State's climate goals. The approaches which may be used to evaluate whether a project may have a less than significant impact on GHG emissions include (1) assessing a project's consistency with key project attributes that have been demonstrated to reduce operational GHG emissions while advancing fair housing, (2) adopting a Net-Zero Threshold of Significance, and (3) Recommended Thresholds of Significance developed by the applicable air district or other lead agencies.

These approaches are recommendations only and do not supplant lead agencies' discretion to develop their own evidence-based approaches for determining whether a project would result in a potentially significant impact on GHG emissions. The ARB notes that, while a net-zero threshold may be an appropriate overall objective, it may not be feasible or appropriate metric for evaluating individual projects. For example, a net-zero target may incorrectly imply that the GHG emissions of any project that are not reduced or offset to zero would be considered potentially significant. This may lead to undue burdens and frustrate project approval processes, which may be particularly problematic for residential development in climate-smart, infill areas. A net-zero policy that prohibits or complicates projects that are needed to support the State's climate goals, like infill development or solar arrays, is ultimately not consistent with the State's goals.

Local

The City addresses GHG emissions in the City of Clovis General Plan (General Plan). The City does not have a qualified GHG reduction plan or ordinances that would address building electrification. The General Plan includes several policies that are relevant to GHG. General Plan goals and policies relevant to reducing GHGs and that may affect the proposed project are identified below.

City of Clovis General Plan

The General Plan includes several policies that are relevant to an evaluation of the energy efficiency and sustainability of the proposed project, which are directly associated with reductions of GHG

emissions. The relevant General Plan policies that are applicable to the proposed project are identified below.[22]

Air Quality Element

Policy 1.6 **Alternative fuel infrastructure**. Encourage public and private activity and employments centers to incorporate electric charging and alternative fuel stations.

Policy 1.7 **Employment measures.** Encourage employers to provide programs, scheduling options, incentives, and information to reduce vehicle miles traveled by employees.

Policy 2.1 **Regional coordination.** Support regional efforts to reduce air pollution (criteria air pollutants and greenhouse gas emissions) and collaborate with other agencies to improve air quality at the emission source and reduce vehicle miles traveled.

Policy 2.6 **Innovative mitigation**. Encourage innovative mitigation measures to reduce air quality impacts by coordinating with the SJVAPCD [San Joaquin Valley Air Pollution Control District], project applicants, and other interested parties.

Open Space and Conservation Element

Policy 3.5 **Energy and Water Conservation.** Encourage new development and substantial rehabilitation projects to exceed energy and water conservation 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.

Circulation Element

Policy 1.9 **Alternative Fuel Infrastructure.** Support the development of infrastructure for alternative fuel vehicles, including electric vehicle charging stations.

Policy 2.2 **Transportation Demand Management.** Encourage strategies that reduce vehicle trips and fuel consumption, such as carpooling, transit use, and active transportation.

Land Use Element

Policy 1.10 **Mixed-Use and Compact Development.** Promote land use patterns that reduce energy consumption by encouraging walkable, transit-accessible, and mixed-use neighborhoods.

[22] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Policy 2.4 **Sustainable Urban Form.** Support development that minimizes energy use through efficient site planning and building orientation.

Public Facilities Element

Policy 4.3 **Municipal Energy Efficiency.** Improve energy efficiency in City-owned facilities and operations through retrofits, audits, and renewable energy adoption.

City of Clovis Municipal Code

City of Clovis Municipal Code (CMC), Chapter 8.16, SEC. 8.16.101 (Adoption of the California Energy Code) states that the City formally adopts the 2025 California Energy Code for regulating energy conservation standards in residential and nonresidential buildings. Any updates by the CBSC are automatically incorporated. In the case of conflicting codes, the most restrictive standard applies to ensure maximum safety and efficiency.

City of Clovis Building Permits and Inspections

The City also enforces other codes that indirectly affect energy use:[23]

- Title 8–Building Regulations: Covers construction standards, including energy-efficient design.
- California Green Building Standards Code (CALGreen): Enforced through local building permit processes.
- Solar Permit Requirements: Clovis has streamlined processes for residential photovoltaic systems, including automated permitting options.

3.8.4 - Methodology

CalEEMod was used to calculate and assess GHG emissions from the Vista Ranch Development, which comprises on-site and off-site construction activities and long-term operational emissions generated from all facets of the Vista Ranch Development. CalEEMod provides a uniform platform for government agencies, land use planners, and environmental professionals to determine emissions from land use development projects in California. Appendix D includes a detailed description of model inputs used in the analysis, while a high-level summary of the major sources of construction and operational GHG emissions that would occur are summarized below.

The GHG emissions impacts associated with implementation of SOI Expansion and Non-development Area and Master Plan (MP) MP Area 2 are addressed qualitatively in Section 3.8.6 below.

Default Data and Assumptions

CalEEMod provides default values for estimating construction and operational emissions. Although users may apply the default values, the CalEEMod guidance and the San Joaquin Valley Air Pollution

[23] City of Clovis. Clovis Building Permits and Inspections. Website: https://www.clovisca.gov/services/planning_development/building/index.php. Accessed July 16, 2025.

Control District (SJVAPCD) recommends that default values be modified whenever project-specific information is available to obtain more accurate emissions quantification.

When changing any default parameters, users must include notes and references in the Justification for Changes box, which will facilitate reviews by lead agencies and other stakeholders. These Justification for Changes were documented when site-specific information was used instead of defaults. The CalEEMod Reports, included as part of Appendix D, include a listing of these changes, and the notes include references to additional calculations and documentation, which are also included in Appendix D.

Greenhouse Gases Assessed

This analysis is restricted to GHG emissions identified by AB 32, which include:

- CO
- CH_4
- N_2O
- HFCs
- PFCs
- SF_6

Construction

GHG emissions from construction can vary substantially from day to day, depending on the level of activity and the specific type of operation. As stated, construction emissions result from on-site and off-site activities. On-site emissions principally consist of exhaust emissions from the activity of light and heavy-duty construction equipment and motor vehicle operation. Off-site emissions are caused by motor vehicle exhaust from delivery vehicles and worker traffic. Construction activities associated with GHG emissions would consist of demolition, site preparation, grading, building construction, and paving.

The Vista Ranch Development construction is expected to be phased over approximately 10 years. If the construction schedule moves to later years, construction-related GHG emissions would likely decrease because of improvements in technology and more stringent regulatory requirements as older, less efficient equipment is replaced by newer and cleaner equipment.

The modeled construction schedule, worker commute trips, vendor and haul truck trips, and construction equipment, along with hours of operation per day, horsepower, load factors, and other modeling assumptions, are available in Appendix D.

Operations

Operational or long-term GHG emissions occur over the life of a development project. Operational emissions are expected to occur from the following sources:

- Area Sources

- Energy Sources
- Mobile Sources
- Stationary Sources (if applicable)
- Refrigerants
- Vegetation

CalEEMod contains calculations to estimate both direct emissions of GHG emissions and indirect GHG emissions occurring elsewhere. Indirect emissions are GHG emissions where the location of the consumption or activity is different from where actual emissions are generated. For example, electricity would be consumed by the Vista Ranch Development within MP Area 1; however, emissions associated with producing that electricity are generated off-site at a power plant.

Area Sources

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion. Equipment in this category would include lawnmowers, grinders, trimmers, and chain saws used to maintain the landscaping of the proposed project. As stated under the Regulatory Framework, AB 1346 aims to ban the sale of new gasoline powered equipment under 25 gross horsepower (hp) (known as SOREs) by 2024. For purposes of this analysis, landscape maintenance equipment was zeroed out to reflect implementation of MM GHG-1c.

Energy

Default electricity within CalEEMod are based on land use and climate zone and utilize 2019 consumption estimates using the CEC's 2018–2030 Uncalibrated Commercial Sector Forecast and 2019 Residential Appliance Saturation Survey. Building electricity use is divided into end uses subject to Title 24 standards and those not subject to Title 24 standards (Title 24 and non-Title 24).

Electricity subject to Title 24 includes space heating, cooling, ventilation, water heating, outdoor lighting, and the majority of indoor lighting, while electricity ***not*** subject to Title 24 includes cooking appliances, clothes washers, electric dryers, refrigeration, office electronics, electric pool/spa heating, well pumping, fans, miscellaneous plug-in uses, and the remainder of indoor lighting.

Natural gas subject to Title 24 includes space heating and water heating, while natural gas ***not*** subject to Title 24 includes all other end uses. Examples of non-Title 24 end uses are range/ovens, dryers, pool/spa heating, and other miscellaneous uses. GHG emissions from this sector are principally from use of space and water heating. As previously stated, the Vista Ranch Development portion of the proposed project would be all-electric. Therefore, GHG emissions associated with natural gas were zeroed out.

Water and Waste

CalEEMod includes calculations for indirect GHG emissions for electricity consumption, water consumption, and solid waste disposal. For water consumption, the model calculates embedded energy (e.g., treatment, conveyance, distribution) associated with providing each gallon of potable

water to the project site. For solid waste disposal, GHG emissions are generated as solid waste generated by the proposed project decomposes in a landfill. CalEEMod defaults are assumed for the proposed project.

Mobile Sources

Motor vehicle emissions refer to exhaust emissions from the motor vehicles that would travel to and from and within the Vista Ranch Development. The GHG emissions from the proposed project's mobile sources were assessed based on the estimated trips to be generated by the Vista Ranch Development according to the traffic analysis conducted for the proposed project (trip generation rates are based on the ITE Trip Generation Manual, 11th Edition, 2021). It should be noted that CalEEMod does not account for Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20), which requires that all new cars and passenger trucks sold in California be ZEVs by 2035. CalEEMod also does not account for the ARB rules related to truck electrification (e.g., Advanced Clean Trucks Regulation).

Stationary Sources

Emergency backup generators and emergency fire pumps represent common sources of operational stationary sources in residential and mixed-use developments. The proposed project does not include plans for either of these types of equipment, or any stationary sources of equipment or facilities that would be subject to permitting through the SJVAPCD. However, any future stationary sources would be subject to permitting through the SJVAPCD, which limits and controls emissions.

Refrigerants

During operation, there may be leakages of refrigerants (hydrofluorocarbons) from air conditioners and any refrigeration systems. Hydrofluorocarbons are typically used for refrigerants, which are long-lived GHGs. The defaults for refrigerants in CalEEMod do not reflect the most recent regulations and restrictions which lead to phasing out of refrigerant emissions; for this reason, refrigerant quantification was not included.

Vegetation

CalEEMod has a module that addresses impacts of Land Use Change and Sequestration. The Vista Ranch Development1 would include planting trees and integrating landscaping into the proposed design, which would provide carbon sequestration. However, the number of trees to be planted is unknown and data are insufficient to accurately determine the impact that the existing landscaping has on carbon sequestration. For this analysis, emissions due to carbon sequestration were not included to present a conservative analysis.

3.8.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether greenhouse emissions impacts are significant environmental effects. The project would have a significant impact on the environment if it would:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. As defined in the CEQA Guidelines, Section 15355, "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. For future projects, the significance of GHG emissions may be evaluated based on locally adopted quantitative thresholds, or consistency with a regional GHG Reduction Plan (such as a CAP).

The City does not have a formal GHG emissions reduction plan (or any other form of a CAP).Therefore, the proposed project is assessed based on its consistency with ARB's latest adopted Scoping Plan (the 2022 Scoping Plan), including the compliance with relevant Scoping Plan measures, as well as the latest Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) for the region within which the proposed project is located (i.e., the Fresno Council of Governments [Fresno COG] 2022 RTP/SCS). It should be noted that the Scoping Plan is consistent with the AB 1279 GHG reduction targets of achieving carbon neutrality by 2045 and reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Therefore, consistency with the ARB's most recent Scoping Plan would also demonstrate consistency with the carbon neutrality requirements encapsulated by AB 1279. This analysis provides a qualitative assessment of the proposed project's compliance with the applicable plans, policies, and regulations for the purposes of reducing GHG emissions to determine whether the proposed project would have a significant impact on the environment relative to GHGs. Separately, the estimated construction and operation-related GHG emissions for the Vista Ranch Development are provided for the purposes of disclosure.

3.8.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Greenhouse Gas Emissions

Impact GHG-1:	**The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development

proposals in the Non-development Area. The Non-development Area includes approximately 445 acres which would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

The Master Plan Area occupies approximately 507 acres of the SOI Expansion Area. The Master Plan is intended to guide long-term development of an urban village that contributes to the Northeast Urban Center (NEUC) common public identity. Accordingly, specific future development proposals, including building designs, operational details including the potential use of natural gas, and construction phasing, remain too speculative to know with reasonable certainty at this time. As such, attempting to quantify GHG emissions from future unknown development implementing the proposed project would be speculative. A substantial proportion of the uses contemplated in the Master Plan would be provided over about the next 10 years by development of the 368-acre Vista Ranch Development, evaluated below. Future development applications implementing the Master Plan would be subject to separate environmental review, at which time project-specific GHG emissions would be evaluated in accordance with applicable thresholds, regulatory frameworks, and climate action policies. The remaining 139 acres, which comprise MP Area 2, are expected to be developed under separate projects over the longer-term future and would be subject to future project-level CEQA analysis tiered from the Revised Draft EIR. However, the development of MP Area 2 would result in the generation of GHG emissions from construction and operation which is discussed below.

Construction

Construction from future development of MP Area 2 would result in direct GHG emissions generated by vehicle trips (i.e., trips by construction workers and haul trucks) and operation of construction equipment. Indirect GHG emissions would be generated by the electricity used to power any electric construction equipment, mobile offices, or water delivered to construction sites.

As the timing and intensity of future development projects are not currently known, the precise effects of construction activities associated with buildout of the proposed project cannot be accurately quantified at this time. In general, the emissions intensity of construction vehicles and equipment would decrease over time as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technology, particularly for trucks. The details needed for adequate modeling and analysis are not currently available, as the development would occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. It is anticipated that the implementation of MP Area 2 would ultimately result in more development. Construction of a multitude of individual development projects that could occur within the City throughout the buildout period could generate GHG emissions that could have a significant impact on the environment. To reduce impacts, the proposed project would implement Mitigation Measure (MM) GHG-1a, which would require idling restrictions and the use of electric construction equipment where available (which would thereby increase fuel efficiency and decrease fuel consumption) to reduce GHG emissions resulting from future construction-related activities due to the development of the new residential and nonresidential

land uses allowable under the proposed project. Implementation of MM GHG-1a would reduce GHG emissions from construction-related activities. Furthermore, the City would consider all future development accommodated by the proposed project where subject to CEQA and would need to require discretionary approval to ascertain whether an individual development would generate potentially significant GHG emission impacts during construction. Prior to project approvals, the City would need to require the implementation of any additional mitigation measures deemed necessary to minimize GHG emissions and reduce potentially significant impacts. Therefore, with incorporation of MM GHG-1a, potential construction-related GHG emission impacts would be less than significant.

Operation

As described previously under Section 3.8.6, operation of new residential and nonresidential development within MP Area 2 would occur intermittently over the course of the buildout period (through approximately 2039). Operational emissions would result from motor vehicle travel, on-site combustion of natural gas for space and water heating, refrigerants, landscaping equipment, water consumption, waste generation, and use of electricity.

As the timing and intensity of future development projects are not currently known, the precise effects of operational activities associated with buildout of the proposed project cannot be accurately quantified at this time. In general, the emissions intensity of passenger vehicles, trucks (that may service nonresidential uses), and landscaping equipment would decrease over time as the industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technology, particularly for trucks. The details needed for adequate modeling and analysis are not currently available, as the development would occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. Operation of a multitude of individual development projects that could occur within the City throughout the buildout period and on an ongoing, long-term basis could generate GHG emissions that could have a significant impact on the environment.

To reduce impacts, development within MP Area 2 would implement MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e to reduce emissions resulting from future operational-related activities due to the development of the new residential and nonresidential land uses allowable under the proposed project. Implementation of MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e would reduce GHG emissions from operational-related activities by restricting the use of natural gas in new development (MM GHG-1b), implementing all-electric landscaping equipment (MM GHG-1c), requiring EV-charging infrastructure (MM GHG-1d), and unbundling parking costs from the cost of multi-family units which promotes reduced car ownership, thereby encouraging reduced VMT (MM GHG-1e). As appropriate, future construction and development plans would also be subject to project-level CEQA analyses and potentially additional feasible mitigation, if necessary. Accordingly, with adherence to MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e, operation-related impacts associated with implementation of MP Area 2 would be less than significant.

Vista Ranch Development/MP Area 1

Implementation of the Vista Ranch Development would contribute to global climate change through direct emissions of GHGs from on-site area sources and vehicle trips and indirectly through off-site

energy production required for on-site activities, water use, and waste disposal. GHGs associated with the Vista Ranch Development would be emitted from on-road vehicles and equipment used during construction and from vehicles used during routine operational activities. The estimated GHG emissions from construction and operational activities associated with the proposed project are shown below.

Emissions (Quantified and Disclosed for Informational Purposes)

Construction

CEQA Guidelines Section 15064.4(a) requires a good faith effort to describe, calculate, or estimate emissions using scientific and factual data. Quantification provides substantial evidence to support the lead agency's determination of significance and ensures transparency, even when the threshold to support the analysis and significance finding relies on consistency with plans or policies rather than numeric limits. Therefore, the construction- and operational-related GHG emissions are disclosed for informational purposes, and project impact is discussed below.

The Vista Ranch Development construction emissions were estimated according to the methods described above and are presented in Table 3.8-2. It should be noted that the analysis conservatively assumes that construction would begin in 2026 and last approximately 10 years. As vehicle and equipment fuel efficiencies and emission control standards continue to incrementally improve each year, construction emissions would be likely to decrease nominally from what is shown in Table 3.8-2 should the construction schedule move to later years. Therefore, the construction GHG emissions contained in Table 3.8-2 represent a conservative assessment of construction emissions.

Table 3.8-2: Vista Ranch Development Construction GHG Emissions

Construction Year	Total GHG Emissions (MT CO_2e per year)
2026	501
2027	747
2028	1275
2029	925
2030	1254
2031	1346
2032	1359
2033	1167
2034	1982
2035	1327
2036	644
Total	**12,527**

Construction Year	Total GHG Emissions (MT CO_2e per year)
Amortized over 30 years	418

Notes:
Because of rounding, total MT CO_2e may be marginally different from CalEEMod output.
MT CO_2e = metric tons of carbon dioxide equivalents
Source: Appendix D.

As shown above, the proposed project would generate approximately 12,527 MT CO_2e over the approximate 10-year phased construction period. There is no existing or proposed construction-related climate impact threshold at this time. GHG emissions from construction represent a small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions, which represent the vast majority of project GHG emissions. Furthermore, construction GHG emissions are amortized over 30 years to align with the assumed 30-year operational life of the proposed project and to allow for a direct comparison with annual operational emissions. These amortized emissions are then accounted for as part of the proposed project's overall GHG estimates, summarized below.

Operation

Operational or long-term emissions occur over the life of the proposed project. The Vista Ranch Development operations were modeled, as described in the methodology above, as each phase became operational beginning in 2029 at the completion of Phase 1 through 2036 at the completion of Phase 6. Table 3.8-3 presents the estimated annual GHG emissions from the proposed project's operational activities. As shown in Table 3.8-3, the Vista Ranch Development would generate approximately 29,729 MT CO_2e per year after the inclusion of 418 MT CO_2e per year associated with amortized project construction emissions.

Table 3.8-3: Project Greenhouse Gas Emissions Year 2036 Buildout of Vista Ranch Development Operations

Operational Year	GHG Emissions (MT CO_2e per year)
2036 Full Buildout	29,311
Amortized Construction Emissions	418
Total Annual Project Emissions	**29,729**

Notes:
Construction emissions are amortized over 30 years which is the expected operational life of the Vista Ranch Development.
MT CO_2e = metric tons carbon dioxide equivalent
Source: Appendix D.

The Vista Ranch Development emissions were estimated and disclosed for informational purposes only. MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e would further reduce GHG emissions from what is shown. These mitigation measures require all-electric buildings (without natural gas); clean construction equipment with lower GHG emissions; EV-charging infrastructure; all-electric landscaping equipment; and unbundled parking costs, which have been shown to lead to reduced vehicle miles traveled (VMT) and associated decreases in GHG emissions from cars.

Impact Analysis

The SJVAPCD does not have a currently valid method for determining whether a project would be a cumulatively considerable contributor or whether a project contributes to solving the cumulative problem of climate change, taking into consideration the State's long-term climate goal of carbon neutrality by 2045.

In addition, as stated, the City does not have a Qualified GHG Reduction Strategy or CAP that meets the criteria in CEQA Guidelines Section 15183.5(b).

Therefore, the Vista Ranch Development is evaluated against Consideration 3, as set forth in Section 15064.4(b) of the CEQA Guidelines, for GHG emissions based on a qualitative evaluation of its consistency with State and local regulations and policies adopted for the reduction and/or mitigation of GHG emissions.

2022 Scoping Plan

Appendix D of the 2022 Scoping Plan provides guidance on evaluating project-level alignment with the State's climate goals in CEQA GHG analyses. According to the 2022 Scoping Plan, residential and mixed-use projects that have all of the key project attributes in Table 3 of Appendix D should accommodate growth in a manner consistent with State GHG reduction and equity prioritization goals. The following presents a consistency analysis of the Vista Ranch Development with Table 3 of Appendix D:

1. Transportation Electrification
    a. Provides EV [electric vehicle] charging infrastructure that, at a minimum, meets the most ambitious voluntary standard in the California Green Building Standards Code at the time of project approval.

       Consistent. With implementation of MM GHG-1d, which requires the implementation of EV charging infrastructure that meets CALGreen Tier 2 standards, the Vista Ranch Development would be consistent this attribute of the 2022 Scoping Plan.
2. VMT Reduction
    a. Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services.

       Consistent. MP Area 1 is partially served by utilities and is surrounded by existing urban uses on the southern boundary. In addition, MP Area 1 has been vacant and

underutilized for more than 10 years and, therefore, would be redeveloping previously underutilized land.

b. Does not result in the loss or conversion of natural and working lands.

Consistent. MP Area 1 is vacant; however, it is not working or natural lands. As stated above, MP Area 1 is currently partially served by utilities and is partially surrounded by urban uses.

c. Consists of transit-supportive densities (minimum of 20 residential dwelling units per acre) **or** is in proximity to existing transit stops (within 0.5 mile) **or** satisfies more detailed and stringent criteria specific in the region's SCS.

Consistent. The proposed project would satisfy two of the criterion in whole or in part.

As noted in the Project Description, portions of the Vista Ranch Development would consist of transit-supportive densities of 20 residential dwelling units per acre (du/acre) or more.

Additionally, as discussed below and shown in Table 3.8-4, the Fresno COG's 2022 RTP/SCS includes five goals with corresponding policies and actions for improved mobility, communities accessible by sustainable transportation options, a multi-faceted multimodal transportation network, a transportation network that supports a sustainable and vibrant economy, and a region that embraces clean transportation, technology, and innovation. These strategies include similar measures to the 2022 Scoping Plan, such as supporting lower-carbon and sustainable transportation options. The Vista Ranch Development's consistency with the applicable 2022 RTP/SCS strategies is discussed in Table 3.8-4. As shown therein, the Vista Ranch Development would be consistent with the GHG emissions reduction strategies contained in the Fresno COG's 2022 RTP/SCS.

d. Reduces parking requirements by eliminating parking requirements **or** includes maximum allowable parking ratios **or** provides residential parking supply at a ratio of less than one parking space per dwelling unit **or** for multi-family residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.

Consistent. With implementation of MM GHG-1e, which would unbundle parking costs in multi-family residences, the Vista Ranch Development would be consistent with this attribute.

e. At least 20 percent of units included are affordable to lower-income residents.

Consistent. Appendix D of the 2022 Scoping Plan does not define "affordable" as being deed-restricted. As stated by the Center for Neighborhood Technology (CNT) study, "Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy," which the 2022 Scoping Plan Appendix D incorporates by reference, lower-income households disproportionately live in location-efficient places, and these places tend to have smaller units, older buildings, and lower parking requirements, all of which contribute to lower

market rents even without subsidies.[24] *Because these housing characteristics inherently reduce housing and transportation costs, the study concludes that built-form characteristics such as unit size, housing type, and location efficiency strongly influence affordability. In addition, according to ARB staff, the 20 percent benchmark for affordable housing is not a hard and fast benchmark.*25 *Consistent with this framework, the Vista Ranch Development includes residential areas of varying densities that support apartments, townhomes, and small-lot single-family units, all of which align with the types of "lower-rent market housing" referenced in the CNT study. Although the Vista Ranch Development does not include deed-restricted affordable units, the range of housing anticipated within Vista Ranch Development is expected to generate affordable units, largely consistent with the affordability mechanisms described in the CNT study and the intent of 2022 Scoping Plan Appendix D.*

f. Results in no net loss of existing affordable units.

Consistent. The Vista Ranch Development would not result in the loss of any existing affordable units.

3. Building Decarbonization

a. Uses all-electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking. *Consistent. The Vista Ranch Development would be designed and constructed as all-electric and would not utilize natural gas.*

As shown, the Vista Ranch Development would demonstrate consistency with the attributes of Table 3, Appendix D in the 2022 Scoping Plan. Therefore, the Vista Ranch Development would be consistent with the 2022 Scoping Plan, and impacts would be less than significant with implementation of MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM GHG-1a Implement GHG Emission Reduction Measures During Construction

The applicant and/or contractor associated with development of sites within the Master Plan Area shall implement the following measures during construction and,

[24] Gregory L. Newmark, Ph.D, and Peter M. Haas, Ph.D. 2015. Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy. December 16.

[25] Matthew Jones, California Air Resources Board (ARB). Personal communication: phone call. March 2025.

where specified below, shall submit reports demonstrating compliance to the Planning Division for its review and approval.

- The applicant shall limit all equipment and delivery truck idling times by shutting down equipment when not in use and reducing the maximum idling time to less than 2 minutes. The applicant shall also install clear signage regarding the limitation on idling time at the delivery driveway and loading areas.
- The applicant shall verify that all construction equipment is maintained and properly tuned in accordance with manufacturers' specifications. Prior to the commencement of construction activities using diesel-powered and/or gasoline powered vehicles or equipment, the applicant shall verify that all vehicles and equipment have been checked by a certified mechanic and determined to be running in proper condition prior to admittance into the delivery driveway and loading areas. The applicant shall use electric construction equipment unless such equipment is unavailable. The applicant shall submit a report by the certified mechanic of the condition construction-related vehicles and equipment, along with justification regarding availability and feasibility of electric equipment, to the Planning Division prior to commencement of their use.

MM GHG-1b Restrict use of natural gas in new development.

Future design and operation of residential sites within the Master Plan Area shall be all-electric, eliminating the use of any natural gas-fueled appliance or building feature.

MM GHG-1c Implement all-electric landscaping equipment.

At operation, all landscaping equipment (e.g., leaf blower) used for property management shall be electric-powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the City's Planning Division to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric-powered.

MM GHG-1d Require electric vehicle (EV) charging infrastructure that meets the California Green Building Standards Code (CALGreen) Tier 2 voluntary requirements.

New residential buildings shall provide EV spaces as required by CALGreen Tier 2.

MM GHG-1e Unbundle parking costs.

Parking costs shall be unbundled from costs to rent or own a residential unit in any multi-family residential unit. This measure shall be documented and enforced through project lease agreements, condominium bylaws, or tenant materials. Prior to issuance of final occupancy permits, the City shall verify that unbundling provisions are included in all lease or sales documents and marketing materials.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed above, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant.

Thus, the issue of climate change involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. The discussion above summarizes the impacts of MP Area 2 as related to climate change and GHG emissions. As discussed therein, MP Area 2 impacts would be less than significant with implementation of identified mitigation and therefore would not result in a cumulatively considerable contribution to a cumulative impact.

Vista Ranch Development/MP Area 1

As discussed above, the geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, as discussed above, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring and cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. The discussion above summarizes the impacts of the Vista Ranch Development as related to climate change and GHG emissions. As discussed therein, the Vista Ranch Development impacts would be less than significant with implementation of identified mitigation, and impacts would therefore not be cumulatively considerable.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

Implement project-specific MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e; no additional mitigation required at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

Conflict with Plan, Policy, or Regulation that Reduces Emissions

Impact GHG-2:	**The proposed project would conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.**

Impact Analysis

Several plans and policies have been adopted to reduce GHG emissions in the San Joaquin Valley region. The proposed project's consistency with the State's 2022 Scoping Plan, as well as Fresno COG's 2022 RTP/SCS, and the General Plan are discussed for each project component below.

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres which would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

MP Area 2

Construction and operation of MP Area 2 would result in the generation of GHG emissions. As the timing and intensity of future development projects are not known at this time, the precise effects of construction and operational activities—and the consistency of those activities with current or future plans—is too speculative to analyze and therefore cannot be accurately evaluated at this time. The details needed for adequate analysis are not currently available as the development would occur at various periods in the future within MP Area 2, which are currently unknown because development would be driven by market forces and private applicants. It is known that implementation of the proposed project would ultimately result in more development than was previously assumed in the City's current Housing Element and General Plan. However, as stated, MP Area 2 does not include any specific development and the exact parameters and project attributes, including project size,

intensity, and buildout year for site-specific development projects, are not available at this time. It would be speculative to evaluate MP Area 2 consistency with current or future plans. Therefore, impacts would be significant and unavoidable.

Vista Ranch Development/MP Area 1

2022 Scoping Plan

As discussed above under Impact GHG-1, the Vista Ranch Development was evaluated for consistency with the 2022 Scoping Plan and would demonstrate consistency with the attributes of Table 3, Appendix D. Therefore, the Vista Ranch Development would be consistent with the 2022 Scoping Plan.

Fresno COG 2022 RTP/SCS

The Fresno COG's 2022 RTP/SCS includes five goals with corresponding policies and actions for improved mobility, communities accessible by sustainable transportation options, a multi-faceted multimodal transportation network, a transportation network that supports a sustainable and vibrant economy, and a region that embraces clean transportation, technology, and innovation. These strategies include similar measures to the 2022 Scoping Plan, such as supporting lower-carbon and sustainable transportation options. The Vista Ranch Development's consistency with the applicable 2022 RTP/SCS strategies is discussed in Table 3.8-4 below. As shown therein, the Vista Ranch Development would be consistent with the GHG emissions reduction strategies contained in the Fresno COG's 2022 RTP/SCS.

Table 3.8-4: Vista Ranch Development Consistency the Fresno COG's 2022 RTP/SCS

Goal	Project Consistency
Goal 1: Improved mobility and accessibility for all	**Consistent.** The Vista Ranch Development would support the use of zero-emission and low-emission vehicles by implementing EV-ready charging spaces consistent with the requirements of the applicable Title 24 Building Energy Efficiency Standards or the current Title 24 standards in effect at the time of project permit approval. In addition, although the Vista Ranch Development is not a transportation improvement project, it would include extensive park and trail connections, both within the Master Plan Area as well as to neighboring areas. The Vista Ranch Development would facilitate pedestrian and bicycle connections to neighboring communities through connections to existing paths.
Goal 2: Vibrant communities that are accessible by sustainable transportation options	**Consistent.** The Vista Ranch Development would support the use of zero-emission and low-emission vehicles by implementing EV-ready charging spaces, consistent with the requirements of the applicable Title 24 Building Energy Efficiency Standards or the current Title 24 standards in effect at the time of project permit approval. In addition, as mentioned, the Vista Ranch Development would also include extensive park and trail connections, both within the Master Plan Area, as well as to neighboring areas. These features would serve to promote sustainable and zero-emission forms of transportation, such as walking and cycling.

Goal	Project Consistency
Goal 3: A safe, well-maintained, efficient, and climate-resilient multimodal transportation network	**Consistent.** The Vista Ranch Development is a residential, commercial, and mixed-use development project, which would provide a wide variety of multimodal and sustainable transportation options, thereby reducing impacts on the climate due to GHG emissions.
Goal 4: A transportation network that supports a sustainable and vibrant economy	**Consistent.** The Vista Ranch Development would provide a variety of housing types and lot sizes that will accommodate a range of housing objectives and buyer needs with a goal to ensure housing for a variety of families and lifestyles. Additionally, the proposed project supports the development of a multimodal transportation network by incorporating enhanced pedestrian infrastructure, improved bicycle access, and proximity to existing transit services. These features promote safe and convenient travel for all users, including pedestrians, bicyclists, transit riders, and motorists, consistent with Policy 1.1. The proposed project's street network is designed with a grid or modified-grid pattern and a high intersection density, which facilitates neighborhood connectivity and internal circulation in accordance with Policies 1.5 and 1.6. The proposed project's objectives include providing infrastructure that meets City standards and would be integrated with existing planned facilities while also providing a strong pedestrian network to link commercial and neighborhood together. Furthermore, it would bring new housing to the City and the broader region by establishing a mixture of housing types, sizes and densities that collectively provide for local and regional housing demand, consistent with City requirements as stated in the latest Regional Housing Needs Analysis (RHNA). In addition, the Vista Ranch Development would create local jobs, as well as provide new shopping options for local and regional residents, thereby supporting a sustainable and vibrant economy.
Goal 5: A region embracing clean transportation, technology, and innovation	**Consistent.** The Vista Ranch Development would provide for EV parking spaces, mixed-use development, create a modern and vibrant pedestrian and bicycle network, and provide for the potential expansion of bus services to the Master Plan Area (including the potential for low- or no emissions bus services). This would ensure that the Vista Ranch Development would help support the region in embracing clean transportation, technology, and innovation.
Source: Fresno Council of Government (Fresno COG). 2022. RTP/SCS.	

City of Clovis General Plan

The Vista Ranch Development is consistent with several General Plan policies aimed at reducing GHG emissions. The mixed-use layout, featuring a village core with local-serving retail and employment opportunities surrounded by higher-density residential areas, supports Policy 1.10 (Mixed-use and Compact Development) and Policy 2.4 (Sustainable Urban Form) by promoting walkable, transit-accessible neighborhoods that reduce the need for automobile trips. The integration of sidewalks, bike lanes, and an extensive trail system further aligns with Policy 2.2 (Transportation

Demand Management) by facilitating active transportation options. The Vista Ranch Development also supports Policy 1.7 (Employment Measures) by incorporating employment uses within the development, reducing VMT associated with commuting. The Vista Ranch Development's long-term infrastructure plan, including alternative transportation facilities, a new bridge for improved internal circulation, and potential EV charging station placement, supports Policies 1.6 and 1.9 (Alternative Fuel Infrastructure). The commitment to diverse housing types, energy-efficient design, and clustered higher-density housing along circulation corridors is consistent with Policies 3.5 (Energy and Water Conservation), 3.6 (Renewable Energy), and 3.7 (Construction and Design). Overall, the Vista Ranch Development aligns with General Plan goals to reduce GHG emissions through thoughtful design, land use planning, and transportation infrastructure.

Furthermore, the Vista Ranch Development would be constructed in compliance with the applicable Title 24 (CALGreen and Energy Code) standards and would be located within walking and biking distance to nearby transit options. Therefore, the Vista Ranch Development would be consistent with the applicable goals, objectives, and policies in the City's General Plan.

Summary

The Vista Ranch Development would be consistent with the goals and policies contained within the City's General Plan, as well as the GHG emissions reduction strategies contained in the Fresno COG's 2022 RTP/SCS, and the 2022 Scoping Plan (with implementation of MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e). Therefore, impacts would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

Implement MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e.

Level of Significance After Mitigation

MP Area 2: Significant and unavoidable impact.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed above, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. The discussion above summarizes the impacts of MP Area 2 as related to consistency with applicable State and local plans to address climate change. As discussed therein, MP Area 2 impacts would be significant and unavoidable even with the implementation of identified mitigation, and impacts would therefore be cumulatively considerable. Cumulative impacts would be significant and unavoidable.

Vista Ranch Development/MP Area 1

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed above, the adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. The discussion above summarizes the potential impacts of the Vista Ranch Development related to consistency with applicable State and local plans to address climate change. As discussed therein, the Vista Ranch Development impacts would be less than significant with the implementation of identified mitigation, and impacts would therefore not be cumulatively considerable.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

Implement project-specific MM GHG-1a, MM GHG-1b, MM GHG-1c, MM GHG-1d, and MM GHG-1e; no additional mitigation is required or available at the cumulative level.

Level of Cumulative Significance After Mitigation

MP Area 2: Significant and unavoidable impact.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution with project-specific mitigation incorporated.

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3.9 - Hazards and Hazardous Materials

3.9.1 - Introduction

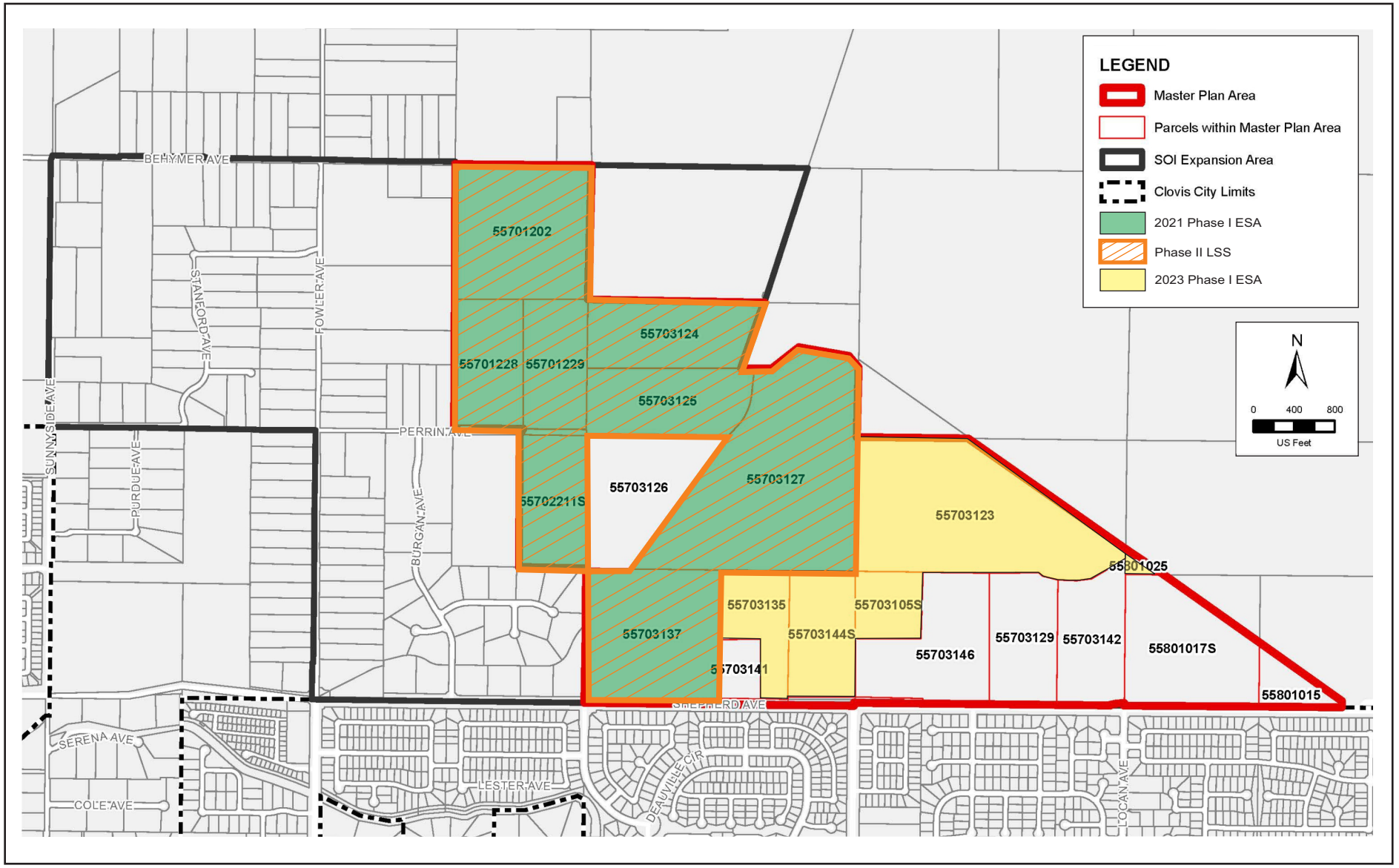
This section describes the existing hazards and hazardous materials setting and potential effects from project implementation on the Sphere of Influence (SOI) Expansion Area and its surrounding area. Descriptions and analysis in this section are based, in part, on the Phase I Environmental Site Assessment, Triangle Property, East Shepherd and North Temperance Avenues, (Assessor's Parcel Numbers [APNs] 557-031-023 [sic], 558-010-25, 557-031-35, 557-031-44S, and 557-031-05S), Fresno, California, dated February 3, 2023 (2023 Phase I ESA) prepared for portions of Master Plan (MP) Area 1; the Phase I Environmental Site Assessment, Shepherd North Properties, North Side of East Shepherd Avenue, Clovis, California, dated February 24, 2021 (2021 Phase I ESA) prepared for portions of MP Area 1; and the Phase II Limited Subsurface Survey and Soil Pile Sampling, Shepherd North Properties, North Side of East Shepherd Avenue, Clovis, California, dated August 30, 2021, prepared by Krazan & Associates, Inc. (Phase II LSS) prepared for one parcel within MP Area 1, included in this Revised Draft Environmental Impact Report (Revised Draft EIR) as Appendix H.

All studies were conducted for MP Area 1. The 2021 Phase I ESA was conducted on the northern and western portions of MP Area 1. The 2023 Phase I ESA was conducted on the remainder of MP Area 1. The Phase II LSS was conducted in response to the 2021 Phase I ESA findings to confirm the presence or absence of dump soil piles and an underground storage tank (UST). There were no Phase I ESAs conducted for MP Area 2 or the Non-development Area. Refer to Exhibit 3.9-1 for study locations.

During the Revised Draft EIR Notice of Preparation (NOP) scoping period, the following public comments related to hazards and hazardous materials were received.

- Comment requesting a Phase I ESA and Phase II ESA, if necessary, be prepared for the entire Master Plan Area. (pp. 3.9-21 to 3.9-26)
- Comment requesting that if the elementary school is developed and operational before the completion of the Vista Ranch Development and Master Plan, the proposed project's staging area be located as far away as possible from the school site. (pp. 3.9-29 to 3.9-30)
- Comment requesting that construction vehicle trips should avoid passing the school site to the greatest extent feasible. (pp. 3.9-29 to 3.9-30)
- Comment expressing concern regarding the increased risk of wildfires due to climate change and wildfire impacts on wildlife. (pp. 3.9-37 to 3.9-38)
- Commenter stating that the Big Dry Creek Dam is earth-filled and has a High Hazard Potential Classification. (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36)

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Source: De Novo Planning Group, January 26, 2024. Fresno County GIS.

Exhibit 3.9-1
Environmental Site Assessment Map

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- Comment(s) stating concern about the increase of population and states the Sphere of Influence (SOI) Expansion Area has been left open as a buffer and opposes development near the dam. (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36)
- Comment(s) stating concerns related to the hazards of placing development adjacent to the Big Dry Creek Dam. (pp. 3.9-7; 3.9-14; 3.9-35 to 3.9-36)

3.9.2 - Environmental Setting

Hazards

A hazard is a situation that poses a level of threat to life, health, property, or the environment. Hazards can be dormant or potential, with only a theoretical risk of harm. However, once a hazard becomes active, it can create an emergency. A hazardous situation that has already occurred is called an incident. Emergency response is action taken in response to an unexpected and dangerous occurrence in an attempt to mitigate its impact on people, structures, or the environment. Emergency situations can range from natural disasters to hazardous materials problems and transportation incidents.

Hazardous Materials and Wastes

Hazardous materials include but are not limited to hazardous materials, hazardous substances, and hazardous wastes, as defined in Section 25501 and Section 25117, respectively, of the California Health and Safety Code. A hazardous material is any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released; and any material that a handler or an administering regulatory agency under Section 25501 has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment. Various properties may cause a substance to be considered hazardous, including:

- Toxicity—causes human health effects;
- Ignitability—has the ability to burn;
- Corrosivity—causes severe burns or damage to materials; and
- Reactivity—causes explosions or generates toxic gases.

Hazardous waste is any hazardous material that is to be discarded, abandoned, or recycled. The criteria that define a material as hazardous also define a waste as hazardous. Specifically, materials and waste may be considered hazardous if they are poisonous (toxic); can be ignited by open flame (ignitable); corrode other materials (corrosive); or react violently, explode, or generate vapors when mixed with water (reactive). Soil or groundwater contaminated with hazardous materials above specified regulatory State or federal thresholds is considered hazardous waste if it is removed from a site for disposal. If handled, disposed, or otherwise handled improperly, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as

hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations (CCR), Title 22, Sections 66261.20-24 contains technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Hazardous Building Materials

Many older buildings contain building materials that consist of hazardous materials. These materials include lead-based paint (LBP), asbestos-containing material (ACM), and polychlorinated biphenyls (PCBs).

Prior to the United States Environmental Protection Agency (EPA) ban in 1978, LBP was commonly used on interior and exterior surfaces of buildings. Disturbances such as sanding and scraping activities, renovation work, gradual wear and tear, old peeling paint, and paint dust particulates have been found to contaminate surface soils or cause lead dust to migrate and affect indoor air quality. Exposure to residual lead can cause severe health effects, especially in children.

Asbestos is a naturally occurring fibrous material that was extensively used as a fireproofing and insulating agent in building construction materials before such uses were banned by the EPA in the 1970s. In addition, many types of electrical equipment contained PCBs as an insulator, including transformers and capacitors. After PCBs were determined to be a carcinogen in the mid to late 1970s, the EPA banned PCB use in new equipment and began a program to phase out certain existing PCB-containing equipment. For example, fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit.

Hazardous Substances

A hazardous substance can be any biological, natural, or chemical substance, whether solid, liquid, or gas, that may cause harm to human health. Hazardous substances are classified on the basis of their potential health effects, whether acute (immediate) or chronic (long-term). Dangerous goods are classified on the basis of immediate physical or chemical effects, such as fire, explosion, corrosion, and poisoning. An accident involving dangerous goods could seriously harm human health or damage property or the environment. Harm to human health may happen suddenly (acute), such as dizziness, nausea, and itchy eyes or skin; or it may happen gradually over years (chronic), such as dermatitis or cancer. Some people can be more susceptible than others. Hazardous substances and dangerous goods can include antiseptic used for a cut, paint for walls, a cleaning product for the bathroom, chlorine in a pool, carbon monoxide from a motor vehicle, fumes from welding, vapors from adhesives, or dust from cement, stone, or rubber operations. Such hazardous substances can make humans very sick if they are not used properly.

Hazardous Materials Listing

The Cortese List is a list of known hazardous materials or hazardous waste facilities that meet one or more of the provisions of Government Code Section 65962.5, including:

- The list of hazardous waste and substances sites from the California Department of Toxic Substances Control (DTSC) EnviroStor database.[1]
- The list of Leaking Underground Storage Tank (LUST) sites by county and fiscal year from the California State Water Resources Control Board (State Water Board) GeoTracker database.[2]
- The list of solid waste disposal sites identified by the State Water Board with waste constituents exceeding hazardous waste levels outside the waste management unit.[3]
- The list of active cease-and-desist orders and cleanup and abatement orders from the State Water Board.[4]

The list of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, as identified by the DTSC.[5]

The SOI Expansion Area is not located in an area with a hazardous materials listing.

Environmental Site Assessments

The objective of a Phase I ESA is to assess whether known or suspect Recognized Environmental Conditions (RECs), Historical RECs (HRECs), or Controlled RECs (CRECs) are associated with the project site. The Phase I ESAs were conducted in conformance with the scope and limitations of the American Society of Testing and Materials (ASTM) E12527-21 Standard Practice for Environmental Site Assessments.

The ASTM E1527-21 Standard defines a REC as (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

[1] California Department of Toxic Substances Control (DTSC). 2025. “Cortese” list of DTSC’s EnviroStor database list of Hazardous Waste and Substances sites. DTSC’s Hazardous Waste and Substances Site List—Site Cleanup (Cortese List). Website: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm. Accessed April 8, 2025.

[2] California State Water Resources Control Board (State Water Board). 2025. “Cortese” List of Leaking Underground Storage Tank Sites by County (San Francisco County). Website: https://geotracker.waterboards.ca.gov/sites_by_county.

[3] California Environmental Protection Agency (Cal/EPA). “Cortese” list of solid waste disposal sites identified with waste constituents above hazardous waste levels outside the waste management unit. Website: http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. Accessed April 8, 2025.

[4] California Environmental Protection Agency (Cal/EPA).2025. “Cortese” list of State Water Board sites with active Cease and Desist Orders or Cleanup Abatement Orders. Website: http://www.calepa.ca.gov/files/2016/10/SiteCleanup-CorteseList-CDOCAOList.xlsx. Accessed April 8, 2025.

[5] California Environmental Protection Agency (Cal/EPA). 2025. “Cortese” list of sites subject to Corrective Action pursuant to Health and Safety Code 25187.5. Website: https://www.calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/. Accessed April 8, 2025.

The ASTM E1527-21 Standard defines a CREC as a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

2023 Phase I ESA

The 2023 Phase I ESA was completed for portions of MP Area 1, as shown in Exhibit 3.9-1, by Krazan & Associates on February 3, 2023. The 2023 Phase I ESA evaluated the following APNs: APN 557-031-023, 557-010-25, 557-031-35, 557-031-44S, and 557-031-05S, and it included site reconnaissance, records search, and interviews.[6]

The 2023 Phase I ESA found evidence of a chemical underground storage tank (UST) at the southeastern corner of a storage shed to the adjacent west of the Landscape Connection, Inc., commercial operation. One metal vent pipe was observed adjacent to a metallic pipe protruding from the ground with a hand pump fixed to the top. According to Mr. Richard Smith, owner, the UST was removed approximately 40 years ago. One 500-gallon unleaded gasoline UST was utilized at the subject site in association with the former poultry/turkey ranch. Available databases identify the UST's status as "active." No records of the UST removal, soil sample analysis, or a Closure Letter are on file with the Fresno County Department of Public Health, Environmental Health System (FCEHS), and no additional information is included on the State Water Board database. Based on the presence of the former UST, the potential exists for petroleum hydrocarbon constituents to have impacted the subsurface in the event a past release occurred. The subsurface conditions in the area of the reported former UST are unknown; therefore, the lack of documentation pertaining to the removal of the gasoline UST represent a REC at the subject site. As such, a Limited Subsurface Survey (LSS) was recommended to assess the presence of a potential UST.

2021 Phase I ESA

The 2021 Phase I ESA was completed for portions of MP Area 1, as shown on Exhibit 3.9-1, by Krazan & Associates on February 24, 2021. The 2021 Phase I ESA evaluated the following APNs: 557-012-02, 557-012-28, 557-012-29, 557-022-11S, 557-031-24, 557-031-25, 557-031-27, and 551-031-37 (see Exhibit 3.9-1), and it included site reconnaissance, records search, and interviews.[7]

The 2021 Phase I ESA identified one REC related to a small UST on APN 557-031-37. No data related to the removal or environmental investigation of the reported UST was revealed in the course of the 2021 Phase I ESA. The 2021 Phase I ESA also identified end-dump soil piles along the southern boundary of the APN 557-012-28 property and in the southwestern portion of the APN 557-031-24 property. No odors, surface staining, stressed vegetation, or other obvious evidence of the presence of hazardous materials or hazardous waste were noted in association with the soil piles.

[6] Krazan & Associates, Inc. 2023. Phase I Environmental Site Assessment, Triangle Property, East Shepherd and North Temperance Avenues, APNs 557-031-023, 558-010-35, 557-031-44S, 557-031-05S, Fresno, California. February 3.

[7] Krazan & Associates, Inc. 2021. Phase I Environmental Site Assessment, Shepherd North Properties, North Side of East Shepherd Avenue, Clovis, California. February 24.

The 2021 Phase I ESA determined that there are approximately seven water wells and four septic systems associated with the area evaluated.

Phase II LSS

In addition, a Phase II LSS was conducted on July 28, 2021.[8] The purpose of the Phase II LSS was to determine impacts related to areas of concern identified in the 2021 Phase I ESA. LSS and soil pile sampling were conducted. The Phase II LSS was conducted only on the part of MP Area 1 that was previously studied under the 2021 Phase I ESA, as shown in Exhibit 3.9-1.

The results of the Phase II LSS indicated the presence of a UST, and a recommendation was made that the UST be removed in accordance with local, State, and federal regulations.

The laboratory results for the soil pile sampling did not indicate any chemicals of concern in exceedance of regulatory screening levels.

Existing Fire-Related Conditions and Presence of Hazardous Materials

The California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP) publishes maps of Fire Hazard Severity Zones (FHSZs) in State Responsibility Areas (SRAs) based on fuel loading, slope, fire weather, and other relevant factors, including areas winds have been identified by CAL FIRE as a major cause of wildfire spread. The FHSZ classifies a wildland zone as Moderate, High, or Very High FHSZ based on the average hazard across the area included in the zone.

The City is entirely designated as a Local Responsibility Area (LRA). The Planning Area contains areas of Moderate FHSZ, most of which are outside of the City's Sphere of Influence (SOI) (Exhibit 3.18-2). The SOI Expansion Area is located within an LRA. The SOI Expansion Area is not categorized as a Very High FHSZ (VHFHSZ) by CAL FIRE.

According to the General Plan, portions of the SOI Expansion Area, including portions of the MP Area 1 and MP Area 2, are located within a Moderate FHSZ. The nearest VHFHSZ to the SOI Expansion Area is located in an SRA and is approximately 3 miles north of the proposed SOI boundary.

Big Dry Creek Dam

Flood protection in the City is afforded by Big Dry Creek Dam on Dry Creek, located adjacent to the SOI Expansion Area.[9] The dam's main purpose is flood control, and it has a storage capacity of 30,200 acre-feet (AF). The Big Dry Creek Dam impounds stormwater runoff from Big Dry Creek in the Big Dry Creek Reservoir, which is owned and operated by the Fresno Metropolitan Flood Control District (FMFCD). The Big Dry Creek Dam provides a 230-year flood level of protection. Big Dry

[8] Krazan & Associates, Inc. 2021. Report of Findings, Phase II Limited Subsurface Survey and Soil Pile Sampling, Shepherd North Properties, North Side of East Shepherd Avenue, Clovis, California. August 30.

[9] County of Fresno. 2024. Fresno County Hazard Mitigation Plan, Annex A: City of Clovis. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/county-administrative-office/hazard-mitigation-plan/annex-files/draft-annex-a-city-of-clovis.pdf. Accessed May 15, 2025.

Creek Dam is classified as an Extremely High Hazard Potential Classification by the Division of Safety of Dams (DSOD).

Portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. Dam failure is generally a result of structural instability caused by improper design or construction, instability resulting from seismic shaking, or overtopping and erosion of the dam. Dams that are higher than 25 feet or with storage capacities over 50 AF of water are regulated by the California Dam Safety Act, which is implemented by the California Department of Water Resources (DWR), DSOD. Because the dam has a storage capacity of 30,200 AF, DSOD is responsible for inspecting and monitoring it. The Act also requires that dam owners submit to the California Office of Emergency Services (OES) inundation maps for dams that would cause significant loss of life or personal injury because of dam failure. The County OES is responsible for developing and implementing a Dam Failure Plan that designates evacuation plans, the direction of floodwaters, and provides emergency information.

3.9.3 - Regulatory Framework

Federal

Clean Air Act

The federal Clean Air Act (CAA) was first signed into law in 1970. In 1977, and again in 1990, the law was substantially amended. The CAA is the foundation for a national air pollution control effort, and it is composed of the following basic elements: National Ambient Air Quality Standards (NAAQS) for criteria air pollutants, hazardous air pollutant standards, State attainment plans, motor vehicle emissions standards, stationary source emissions standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions.[10]

Occupational Health and Safety Act

The Occupational Safety and Health Administration (OSHA) of the United States Department of Labor is responsible for implementing and enforcing federal laws and regulations that address worker health and safety. OSHA requires specific training for hazardous materials users and handlers, provision of information (procedures for personal safety, hazardous materials storage and handling, and emergency response) to employees who may be exposed to hazardous materials, and acquisition of material safety data sheets from materials manufacturers. Material safety data sheets describe the risks, as well as proper handling and procedures, related to particular hazardous materials. Employee training must include response and remediation procedures for hazardous materials releases and exposures. Construction workers and operational employees at the project site would be subject to these requirements.

[10] United States Environmental Protection Agency (EPA). 2025. Clean Air Act Overview, Clean Air Act Text. Website: https://www.epa.gov/clean-air-act-overview/clean-air-act-text#toc. Accessed April 8, 2025.

Code of Federal Regulations, Titles 29 and 40

Regulations in Code of Federal Regulations Title 29 include requirements to manage and control exposure to LBP and ACMs. In California, these requirements are implemented by the California Occupational Safety and Health Administration (Cal/OSHA) under CCR Title 8 (see further discussion of CCR Title 8 below). The removal and handling of ACMs is governed primarily by EPA regulations under Code of Federal Regulations Title 40. The regulations require that the appropriate State agency be notified before any demolition, or before any renovations, of buildings that could contain asbestos or ACMs above a specified threshold.

Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation, and Liability Act

The EPA is responsible for implementing and enforcing federal laws and regulations pertaining to hazardous materials. The primary legislation includes the Resource Conservation and Recovery Act of 1976 (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) and the Emergency Planning and Community Right-to-Know Act (known as SARA Title III). RCRA and the 1984 RCRA Amendments regulate the treatment, storage, and disposal of hazardous and nonhazardous wastes and mandate that hazardous wastes be tracked from the point of generation to their ultimate fate in the environment, including detailed tracking of hazardous materials during transport and permitting of hazardous material handling facilities. As permitted by RCRA, in 1992, the California Environmental Protection Agency (Cal/EPA)-approved program, called the Hazardous Waste Control Law (HWCL), is administered by DTSC to regulate hazardous wastes in California, as discussed further below. The purpose of CERCLA is to identify and clean up chemically contaminated sites that pose a significant environmental health threat, and the Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities. SARA relates primarily to emergency management of accidental releases and requires annual reporting of continuous emissions and accidental releases of specified compounds that are compiled into a nationwide Toxics Release Inventory. Finally, SARA Title III requires formation of State and local emergency planning committees that are responsible for collecting material handling and transportation data for use as a basis for planning and provision of chemical inventory data to the community at large under the “right-to-know” provision of the law.

Hazardous Materials Transportation Act

Under the Hazardous Materials Transportation Act of 1975, the United States Department of Transportation (USDOT), Office of Hazardous Materials Safety regulates the transportation of hazardous materials on water, rail, and highways, through air, or in pipelines and enforces guidelines created to protect human health and the environment and reduce potential impacts by creating hazardous material packaging and transportation requirements. It also includes provisions for material classification, packaging, marking, labeling, and shipping documentation. The USDOT provides hazardous materials safety training programs and supervises activities involving hazardous materials. In addition, the USDOT develops and recommends regulations governing the multimodal transportation of hazardous materials.

Aboveground Petroleum Storage Act, and Spill Prevention, Control, and Countermeasure Rule

The Aboveground Petroleum Storage Act of 1990 and the Spill Prevention, Control, and Countermeasure (SPCC) Rule (amended 2010) of the Oil Pollution Prevention regulation (Title 40 Code of Federal Regulations Part 112) require the owner or operator of a tank facility with an aggregate storage capacity greater than 1,320 gallons to notify the local Certified Unified Program Agency (CUPA) and prepare an SPCC plan. The SPCC plan must identify appropriate spill containment measures and equipment for diverting spills from sensitive areas and must discuss facility-specific requirements for the storage system, inspections, recordkeeping, security, and training.

Clean Water Act

The Clean Water Act (CWA) (United States Code [USC] Title 33 § 1251. *et seq.*) is the major federal legislation governing water quality. The CWA established the basic structure for regulating discharges of pollutants into waters of the United States (not including groundwater). The objective of the act is "to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States. Responsibility for administering the CWA resides with the State Water Board and nine Regional Water Quality Control Boards (RWQCBs); the Central Valley RWQCB administers the CWA for Fresno County. Section 404 of the CWA regulates temporary and permanent fill and disturbance of waters of the United States, including wetlands. The United States Army Corps of Engineers (USACE) requires that a permit be obtained if a project proposes to place fill in navigable waters and/or to alter waters of the United States below the ordinary high-water mark in non-tidal waters. Section 401 of the CWA requires compliance with State water quality standards for actions within State waters. Compliance with the water quality standards required under Section 401 is a condition for issuance of a Section 404 permit. Under Section 401 of the CWA, every applicant for a permit or license for any activity that may result in a discharge to a water body must obtain a State water quality certification from the RWQCB to demonstrate that the proposed activity would comply with State water quality standards.

State

Assembly Bill 337

Per Assembly Bill (AB) 337, local fire prevention authorities and CAL FIRE are required to identify VHFHSZs in LRAs. Standards related to brush clearance and the use of fire-resistant materials in FHSZs are also established.[11]

California Hazardous Waste Control Law

The HWCL is the primary hazardous waste statute in the State of California and implements RCRA as a "cradle-to-grave" waste management system for handling hazardous wastes in a manner that protects human health and the environment and reduces potential resulting impacts. The law

[11] California Department of Forestry and Fire Protection (CAL FIRE). 2020. Frequently Asked Questions about 2020 Fire Hazard Severity Zones. Website: https://bof.fire.ca.gov/media/ttpi3n3m/full-14-b-vhfhsz-frequently-asked-questions.pdf. Accessed April 8, 2025.

specifies that generators have the primary duty to determine whether their waste is hazardous and to ensure proper management. The HWCL also establishes criteria for the reuse and recycling of hazardous waste used or reused as raw materials. The law exceeds federal requirements by mandating source reduction planning, and a much broader requirement for permitting facilities that treat hazardous waste. It also regulates a number of types of waste and waste management activities that are not covered by federal law.

California Health and Safety Code

The California Health and Safety Code (HSC § 25141) defines hazardous waste as a waste or combination of waste that may:

> . . . because of its quantity, concentration, or physical, chemical, or infection characteristics:
>
> (1) Cause or significantly contribute to an increase in mortality or an increase in serious irreversible or incapacitation-reversible illness.
>
> (2) Pose a substantial present or potential hazard to human health or the environment, due to factors including, but not limited to, carcinogenicity, acute toxicity, chronic toxicity, bioaccumulative properties, or persistence in the environment, when improperly treated, stored, transported, or disposed of or otherwise managed.

These regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management practices for hazardous wastes; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous waste that commonly would be disposed of in landfills.

Under both the RCRA and the HWCL, hazardous waste manifests must be retained by the generator for a minimum of 3 years. The generator must match copies of the manifests with copies of manifest receipts from the treatment, disposal, or recycling facility.

In accordance with Chapter 6.11 of the California Health and Safety Code (HSC § 25404, *et seq.*), local regulatory agencies enforce many federal and State regulatory programs through the CUPA program, including:

- Hazardous materials business plans (HMBPs) (HSC § 25501, *et seq.*).
- State Uniform Fire Code requirements (UFC § 80.103, as adopted by the State Fire Marshal pursuant to HSC § 13143.9).
- USTs (HSC § 25280, *et seq.*).
- Aboveground storage tanks (HSC § 25270.5(c)).
- Hazardous waste-generator requirements (HSC § 25100, *et seq.*).

California Code of Regulations

Title 3 of the CCR pertains to the application of pesticides and related chemicals. Parties applying regulated substances must continuously evaluate application equipment, the weather, the treated lands, and all surrounding properties. Title 3 prohibits any application that would:

- Contaminate persons not involved in the application;
- Damage non-target crops or animals or any other public or private property; and
- Contaminate public or private property or create health hazards on said property.

Cal/OSHA assumes primary responsibility for developing and enforcing workplace safety regulations. These regulations concern the use of hazardous materials in the workplace, including requirements for employee safety training; availability of safety equipment; accident and illness prevention programs; hazardous substance exposure warnings; and preparation of emergency action and fire prevention plans.

Cal/OSHA also enforces hazard communication program regulations, including procedures for identifying and labeling hazardous substances, and requires that safety data sheets (formerly known as material safety data sheets) be available for employee information and training programs. Cal/OSHA standards are generally more stringent than federal regulations. Construction workers and operational employees at the project site would be subject to these requirements.

CCR, Title 8, Section 1529 authorizes Cal/OSHA to implement the survey requirements of Code of Federal Regulations Title 29 relating to asbestos. These federal and State regulations require facilities to take all necessary precautions to protect employees and the public from exposure to asbestos. Workers who conduct asbestos abatement must be trained in accordance with federal and State OSHA requirements.

CCR, Title 8, Section 1532.1, includes requirements to manage and control exposure to LBP. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based material. Loose and peeling LBP must be disposed of as a State and/or federal hazardous waste if the concentration of lead equals or exceeds applicable hazardous waste thresholds. Federal and State OSHA regulations require a supervisor who is certified with respect to identifying existing and predictable lead hazards to oversee air monitoring and other protective measures during demolition activities in areas where LBP may be present. Special protective measures and notification of Cal/OSHA are required for highly hazardous construction tasks related to lead, such as manual demolition, abrasive blasting, welding, cutting, or torch burning of structures, where LBP is present.

Title 14 of the CCR establishes minimum standards for solid waste handling and disposal.

Title 17 of the CCR establishes regulations relating to the use and disturbance of materials containing naturally occurring asbestos.

Title 19 of the CCR establishes a variety of emergency fire response, fire prevention, and construction and construction materials standards.

Title 26 of the CCR is a medley of State regulations pertaining to hazardous materials and waste that are presented in other regulatory sections. Title 26 mandates specific management criteria related to hazardous materials identification, packaging, and disposal. In addition, Title 26 establishes requirements for hazardous materials transport, containment, treatment, and disposal. Finally, staff training standards are set forth in Title 26.

Title 27 of the CCR sets forth a variety of regulations relating to the construction, operation, and maintenance of the State's landfills. The title establishes a landfill classification system and categories of waste. Each class of landfill is constructed to contain specific types of waste (household, inert, special, and hazardous).[12]

California Code of Regulations Title 22, Division 4.5

CCR, Title 22, Division 4.5, contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. CCR, Title 22, Chapter 11, Article 3, "Soluble Threshold Limits Concentrations/Total Threshold Limits Concentration Regulatory Limits," identifies the concentrations at which soil is determined to be a California hazardous waste. California's Universal Waste Rule (22 CCR § 66273) provides an alternative set of management standards in lieu of regulation as hazardous wastes for certain common hazardous wastes, as defined in CCR, Title 22, Section 66261.9. Universal wastes include fluorescent lamps, mercury thermostats, and other mercury-containing equipment. Existing structures may contain fluorescent light ballasts that could contain mercury or lead. The Alternative Management Standards for Treated Wood Waste (22 CCR § 67386) were developed by the DTSC to allow for disposal of treated wood as a nonhazardous waste, to simplify and facilitate the safe and economical disposal of such waste. Chemically treated wood can contain elevated levels of hazardous chemicals (e.g., arsenic, chromium, copper, pentachlorophenol, or creosote) that equal or exceed applicable hazardous waste thresholds. The Alternative Management Standards provide for less stringent storage requirements and extended accumulation periods, allow shipments without a hazardous waste manifest and a hazardous waste hauler, and allow disposal at specific nonhazardous waste landfills.

California Government Code Section 65302

California Government Code Section 65302, which establishes standards for developing and updating General Plans, includes fire hazard assessment and Safety Element content requirements

Porter-Cologne Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the

[12] JUSTIA. 2025. California Code of Regulations. Website: https://regulations.justia.com/states/california/. Accessed April 8, 2025.

people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt water quality control plans (also known as basin plans) for all areas of the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of State Water Board and RWQCBs to adopt and periodically update water quality control plans that recognize and reflect the differences in existing water quality, the beneficial uses of the region's groundwater and surface water, and local water quality conditions and problems. It also authorizes the State Water Board and RWQCBs to issue and enforce waste discharge requirements and to implement programs for controlling pollution in State waters. Finally, the Porter-Cologne Act also authorizes the State Water Board and RWQCBs to oversee site investigation and cleanup for unauthorized releases of pollutants to soils and groundwater and in some cases to surface waters or sediments.

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies. Emergency response team members respond and work with local fire and police agencies, emergency medical providers, the California Highway Patrol (CHP), CAL FIRE, California Department of Fish and Wildlife (CDFW), and California Department of Transportation (Caltrans).

California Department of Forestry and Fire Protection

CAL FIRE has mapped fire threat potential throughout California. CAL FIRE maps fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. Additionally, CAL FIRE produced a 2010 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments. CAL FIRE's Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code as well as overseeing hazardous liquid pipeline safety.

California Building Code

The State of California provided a minimum standard for building design through the 2022 California Building Code (CBC), which is located in Part 2 of Title 24 of the CCR. The 2022 CBC is based on the 2015 International Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local City and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all new high-rise buildings and residential buildings; the establishment of fire resistance standards for fire doors, building material; and particular types of construction.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors[13] on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrester to reduce the potential for igniting a wildland fire (PRC § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

Senate Bill 92

Senate Bill (SB) 92 added new sections to the Water Code requiring owners of all State-jurisdictional dams, except low hazard dams, to prepare inundation maps and Emergency Action Plans (EAPs) for dams and critical appurtenant structures. Owners must submit inundation maps for dams and critical appurtenant structures to the DWR for review and approval. Water Code Section 6161(a)(3) requires that owners develop an emergency action plan based on the department-approved inundation map(s) and submit the EAP to the California Governor's Office of Emergency Services.

Regional

Certified Unified Program Agency

The Cal/EPA designates specific local agencies as CUPAs, typically at the county level. The FCEHS is the CUPA designated for Fresno County. The FCEHS is responsible for the implementation of statewide programs within its jurisdiction, including USTs, HMBP requirements, California Accidental Release Prevention (Cal-ARP) program. Implementation of these programs involves permitting, inspecting, providing education/guidance, investigations, and enforcement.

[13] A spark arrester is a device that prohibits exhaust gases from an internal combustion engine from passing through the impeller blades where they could cause a spark. A carbon trap is commonly used to retain carbon particles from the exhaust.

San Joaquin Valley Air Pollution Control District

San Joaquin Valley Air Pollution Control District (SJVAPCD) has jurisdiction over the City and deals with pollutants that get into the air from stationary (including fumes, dust and smoke, and some asbestos) and mobile sources. SJVAPCD's mission is to improve the health and quality of life for all Valley residents through efficient, effective, and entrepreneurial air quality management strategies. SJVAPCD responds to complaints about smells, answers questions about air quality management permits, and reviews development projects for compliance with air quality and greenhouse gas significance thresholds. The SJVAPCD and air quality are addressed in detail in Section 3.3, Air Quality, of this Revised Draft EIR.

Local

City of Clovis General Plan

The following policies of the General Plan related to hazards and hazardous materials are applicable to the proposed project:[14]

Environmental Safety Element

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 2.2 **Mitigation and remediation of groundwater contamination.** Actively participate in local and regional efforts directed at mitigating environmental exposure to and cleaning up contaminated groundwater.

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 2.5 **Safer Alternatives**. Minimize the use of hazardous materials by encouraging the selection of non-toxic alternatives that do not pose a threat to the environment.

Policy 3.11 **Airport land use compatibility.** Approve land uses in a manner that is consistent with the Fresno Yosemite International Airport Land Use Compatibility Plan.

[14] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025

Public Facilities and Service Element

Policy 6.8 **Emergency preparedness planning.** Maintain an emergency operations plan, an emergency operations center, and a hazard mitigation plan to prepare for actual or threatened conditions of disaster or extreme peril.

3.9.4 - Methodology

Impacts related to hazards and hazardous materials for the City and the SOI Expansion Area were analyzed using a variety of State and local online databases, City websites, web maps, and the Phase I ESAs and Phase II LSS prepared by Krazan & Associates. Information on hazardous waste facilities and substance sites, along with hazardous waste sites subject to corrective action, was provided by online databases by the DTSC through the Cortese List. Hazardous waste facilities and substance sites within the City were evaluated in the EnviroStor database, including details on the site's program type, status, location, and land use restrictions. The State Water Board provided public online records through the Cortese List for information on solid waste disposal sites with waste discharges to adjacent land and active cease and desist and abatement orders. Information on sites that have completed remediation for LUSTs, along with sites that have open cases undergoing site assessments or remediation for LUSTs within the City, was obtained from the State Water Board's Geotracker Database.

Cumulative Analysis

The geographic scope of the cumulative hazards and hazardous materials analysis is the County of Fresno, including all cumulative growth therein, as represented by full implementation of each respective General Plan. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect hazards and hazardous materials. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular California Environmental Quality Act (CEQA) threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.9.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether hazards and hazardous materials impacts resulting from the implementation of the proposed project would be considered significant if the project would:

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 two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working 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.

3.9.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Routine Transport, Use, or Disposal of Hazardous Materials

Impact HAZ-1:	**The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

Impact Analysis

SOI Expansion and Non-development Area

The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres for which no entitlements have been requested and none would be received other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the proposed SOI Expansion and Non-development Area would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Therefore, no impacts would occur.

MP Area 2

Construction

During construction activities, commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) could be used and may temporarily generate small amounts of hazardous waste. Construction workers and the public could be exposed to hazards and hazardous materials because of improper handling or use during construction activities (particularly by untrained personnel), transportation accidents, fires, or other emergencies. However, future development within the proposed Master Plan Area would be required to comply with regulations on

the transportation of hazardous materials codified in Title 49 Code of Federal Regulations Parts 173 and 177 and CCR Title 26, Division 6. These regulations, which are under the jurisdiction of Caltrans and the CHP, provide specific packaging requirements, define unacceptable hazardous materials shipments, and prescribe safe-transit practices by carriers of hazardous materials. Compliance with these regulations would reduce the risk of exposure to humans and the environment related to the transportation of hazardous materials.

Additionally, hazardous materials regulations, which are codified in CCR Titles 8 and 22, and their enabling legislation set forth in Chapter 6.5 (Section 25100, *et seq*.) of the California Health and Safety Code, were established at the State level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. Construction specifications would include the following requirements in compliance with applicable regulations and codes, including, but not limited to, CCR Titles 8 and 22, Uniform Fire Code, and Division 20 of the California Health and Safety Code: all reserve fuel supplies and hazardous materials must be stored within the confines of a designated construction area; equipment refueling and maintenance must take place only within the staging area; and construction vehicles shall be inspected daily for leaks. Off-site activities (e.g., utility construction) would also be required to comply with these regulations. These regulations and codes would be implemented, as appropriate, and would be monitored by the State and/or local jurisdictions, including the FCEHS. As such, impacts related to the routine, transport, use, or disposal of hazardous materials would be less than significant.

Operation

Operation of the proposed Master Plan, which includes residential and commercial uses, may require the use and/or storage of common household hazardous materials, including paints, insecticides, detergents, cleaners, and cleaning solvents. Compliance with the applicable laws and regulations would ensure that operational impacts would be less than significant.

Vista Ranch Development/MP Area1

Construction

Construction workers and the public could be exposed to hazards and hazardous materials because of improper handling or use during construction activities (particularly by untrained personnel); transportation accidents; or fires or other emergencies. However, the proposed Vista Ranch Development would be required to comply with regulations on the transportation of hazardous materials codified in Title 49 Code of Federal Regulations Parts 173 and 177 and CCR Title 26, Division 6. As discussed above, these regulations, which are under the jurisdiction of Caltrans and the CHP, provide specific packaging requirements, define unacceptable hazardous materials shipments, and prescribe safe-transit practices by carriers of hazardous materials. Compliance with these regulations would reduce the risk of exposure to humans and the environment related to the transportation of hazardous materials.

Additionally, the proposed Vista Ranch Development would be required to comply with hazardous materials regulations of the California Health and Safety Code. Construction specifications would include the following requirements in compliance with applicable regulations and codes, including, but

not limited to, CCR Titles 8 and 22, Uniform Fire Code, and Division 20 of the California Health and Safety Code: all reserve fuel supplies and hazardous materials must be stored within the confines of a designated construction area; equipment refueling and maintenance must take place only within the staging area; and construction vehicles shall be inspected daily for leaks. Off-site activities (e.g., utility construction) would also be required to comply with these regulations. These regulations and codes would be implemented, as appropriate, and would be monitored by the State and/or local jurisdictions, including the FCEHS. As such, impacts related to the routine, transport, use, or disposal of hazardous materials would be less than significant.

Operation

Operation of the proposed Vista Ranch Development, which includes residential and commercial uses, may require the use and/or storage of common household hazardous materials, including paints, insecticides, detergents, cleaners, and cleaning solvents. Compliance with the applicable laws and regulations would ensure that operational impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The proposed Master Plan, in conjunction with cumulative development in the region, would include areas designated for a variety of uses as defined by the applicable General Plan. Cumulative development would include continued operation or development of new facilities as allowed under each land use designation. New development would inevitably increase the use of hazardous materials within the region, resulting in potential health and safety effects related to hazardous materials use. For the most part, potential impacts associated with new and future development would be confined to commercial and industrial areas and would not involve the use of hazardous substances in large quantities or substances that would be particularly hazardous. Incidents, if any, would typically be site-specific and would involve accidental spills or inadvertent releases. Associated health and safety risks would generally be limited to those individuals using the materials or to persons in the immediate vicinity of the materials and would not combine with similar effects elsewhere (i.e., construction workers). Hazard-related impacts tend to be site-specific and project-specific. Therefore, cumulative impacts would be less than significant.

Additionally, MP Area 2 is not associated with any existing hazardous materials spills. Future development associated with the proposed Master Plan would be required to follow all applicable requirements and regulations related to hazardous materials, and the uses within MP Area 2 would not be expected to store or transport substantial amounts of hazardous materials. Therefore, the proposed Master Plan would not have a cumulatively contribution to the already less than significant cumulative impact and impacts would be less than significant.

Vista Ranch Development/MP Area 1

The cumulative projects would implement construction activities, such as demolition of existing structures, if necessary, ground-disturbing activities, and the use of construction equipment. Construction activities would involve the transport, use, and disposal of hazardous materials including diesel fuels, paints, cements, aerosols, and potentially hazardous building materials and contaminated soils that may be situated on each project site where the transport of such materials may lead to a cumulatively considerable increase in creating a significant hazard to the public and environment. There are no cumulative projects within the immediate vicinity of the proposed project that could contribute to a potential construction-related cumulative impact. Accordingly, cumulative construction impacts would be less than significant.

Nevertheless, past, present, and reasonably foreseeable projects, along with the proposed project, would be required to abide by the same federal, State, and regional regulations pertaining to implementing precautionary measures toward the transporting, handling, usage, storage, and disposal of hazardous materials, including those from the Hazardous Materials Transportation Act, CCR, and Health and Safety Code. As such, the transportation, handling, and disposal of any contaminated soil or other hazardous building materials in MP Area 1 during construction would not result in a cumulatively considerable contribution. Therefore, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impact related to construction.

Development of the proposed Vista Ranch Development would not result in significant increased risks of hazards in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Development of the proposed Vista Ranch Development would not result in a cumulatively considerable contribution, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Risk of Upset

Impact HAZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. As such, the proposed SOI Expansion and Non-development Area would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. No impact would occur.

MP Area 2

The discussion below analyzes both construction-related impacts and impacts associated with long-term operation of development within MP Area 2. Implementation of the Master Plan in MP Area 2 would result in continued use and storage of hazardous materials, including household cleaning products, paints, solvents, building maintenance products. If existing structures are demolished to accommodate new development, hazardous building materials such as ACM or LBP could be encountered. Transport of hazardous materials is likely to continue to occur on local and/or regional roadways. Therefore, there is a potential for accidental release of hazardous materials within MP Area 2.

The Clovis Fire Department (CFD) is responsible for providing hazardous materials spill/release mitigation within the City and consists of 70 sworn personnel.[15] Furthermore, all new development resulting from the proposed Master Plan that would handle, store, produce, or dispose of hazardous materials would be subject to federal, State, and local regulations outlined in Section 3.9.3, Regulatory Framework. Additionally, the Master Plan proposed primarily residential, commercial, and mini-storage (light industrial) land uses that are not expected to use and store large quantities of hazardous materials.

Future development within MP Area 2 would be required to adhere to applicable General Plan policies intended to reduce potential project-specific impacts, including Environmental Safety Element Policies 1.4, 2.1, 2.2, 2.3, and 2.5, as described in Section 3.9.3, Regulatory Framework, above.

Any potentially contaminated properties within MP Area 2 would be evaluated, remediated, and developed in accordance with regulatory requirements. However, the cleanup process also would be subject to case-by-case considerations, with regulatory actions and oversight subject to agency-owner interactions and negotiations. While compliance with applicable federal, State, and local

[15] Clovis Fire Department. 2025. About Clovis FD. Website: https://www.clovisca.gov/services/fire/about/index.php#:~:text=The%20Fire%20Department%20is%20responsible,for%20the%20citizens%20of%20Clovis. Accessed June 4, 2025.

standards (including the General Plan policies described above) requires sites contaminated with hazardous materials to be cleaned up, the redevelopment of these or other future sites where hazardous materials are unknown could create a significant impact to future occupants of MP Area 2 and/or construction workers. Therefore, Mitigation Measure (MM) HAZ-2a through MM HAZ-2h would reduce potential impacts regarding the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment.

MM HAZ-2a requires new development to prepare a Phase I Environmental Site Assessment (Phase I ESA), which would identify RECs and become the basis for potential recommendations for follow-up investigation. MM HAZ-2b requires a Phase II ESA to be prepared to further evaluate RECs determined in the Phase I ESA. MM HAZ-2c requires additional Phase II ESAs to be prepared in the event that the initial Phase II ESA describes site characteristics that require further investigation. MM HAZ-2d requires site remediation in the event that the Phase II ESA(s) find concentrations of hazardous materials exceeding regulatory thresholds. MM HAZ-2e requires the use of an Environmental Site Management Plan (ESMP), when applicable. MM HAZ-2f provides requirements for sites with potential residual volatile organic compounds (VOCs) in soil, soil gas, or groundwater that are planned for redevelopment with an overlying occupied building. MM HAZ-2g provides requirements for demolitions when ACM and LBP may be present. Finally, MM HAZ-2h provides requirements that must be followed in the event that soils with toxic or hazardous materials concentrations that exceed applicable Environmental Screening Levels are found.

In addition to the above referenced MM HAZ-2a through MM HAZ-2h, any future individual development projects that involve the transport, use, or disposal of hazardous materials would be subject to existing federal, State, and local regulations outlined in Section 3.9.3, Regulatory Framework, as well as regulatory programs overseen/administered by the local CUPA. Compliance with the laws and regulations referenced above under Impact HAZ-1 would ensure hazardous impacts from development of the proposed MP Area 2 related to the creation of a possible hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment are anticipated to be less than significant. Consistent with the General Plan policies, individual development projects would be required to undergo project-specific environmental review, which may require additional site-specific measures to reduce any potential impacts and ensure that impacts remain less than significant.

Vista Ranch Development/MP Area 1

Construction

MP Area 1 has been developed with approximately eight domestic water wells, five septic and leach field systems, propane fuel tanks, and an irrigation well and pump. These site features were identified by the Phase I ESAs as site development issues, which should be properly assessed and destroyed in accordance with State and local guidelines. The proposed project would also implement MM HAZ-2i, which would require the proposed Vista Ranch Development to ensure that a well abandonment permit is obtained from Fresno County Department of Public Health Environmental Health Division

and that all on-site domestic water wells, septic and leach field systems, propane fuel tanks, and irrigation and well pumps are properly abandoned and/or removed.

As described in the Environmental Setting, the 2021 Phase I ESA and Phase II LSS identified a UST within MP Area 1, which is a REC. As such, MM HAZ-2j requires the removal of the UST, including any associated pipes or wires, in accordance with all applicable regulations.

Additionally, the 2023 Phase I ESA identified the potential for another UST within MP Area 1. As such, MM HAZ-2k requires the completion of a Phase II LSS to assess the potential for that UST and complete any remedial activities in accordance with applicable regulations.

As described above, there is potential for structures within MP Area 1 to contain ACMs or LBP based on the dates they were constructed. As such, the proposed Vista Ranch Development would be required to implement MM HAZ-2l, which specifies that all construction or demolition activities comply with Cal/OSHA asbestos and lead worker construction standards and off-site disposal requirements. Overall, consistency with federal, State, and local laws and regulations related to the handling of hazardous materials discussed above, including implementation of MM HAZ-2i through HAZ-2l, would ensure that potential impacts are reduced to a less than significant level.

Operation

Operation of the proposed Vista Ranch Development, which includes residential uses, may require the use and/or storage of common household hazardous materials, including paints, insecticides, detergents, cleaners, and cleaning solvents. Compliance with the applicable laws and regulations would ensure operational impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

MM HAZ-2a Prior to the issuance of a grading permit, the property owners and/or developers of properties within Master Plan Area 2 (MP Area 2) shall ensure that a Phase I Environmental Site Assessment (Phase I ESA) (performed in accordance with the current Airborne Toxic Control Measures [ATCM] Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process [E 1527]) shall be conducted for each individual property prior to development or redevelopment to ascertain the presence or absence of Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs), and Potential Environmental Concerns (PECs) relevant to the property under consideration. The findings and conclusions of the Phase I ESA shall become the basis for potential recommendations for follow-up investigation.

MM HAZ-2b In the event that the findings and conclusions of the Phase I Environmental Site Assessment (Phase I ESA) for a property result in evidence of Recognized Environmental Conditions (RECs), Historical Recognized Environmental Conditions (HRECs) and/or Potential Environmental Concerns (PECs) requiring further investigation, the property owners and/or developers of properties shall ensure that a Phase II ESA shall be conducted to determine the presence or absence of a significant impact to the subject site from hazardous materials. The Phase II ESA may include but may not be limited to the following: (1) Collection and laboratory analysis of soils and/or groundwater samples to ascertain the presence or absence of significant concentrations of constituents of concern; (2) Collection and laboratory analysis of soil vapors and/or indoor air to ascertain the presence or absence of significant concentrations of volatile constituents of concern; and/or (3) Geophysical surveys to ascertain the presence or absence of subsurface features of concern such as underground storage tanks (USTs), drywells, drains, plumbing, and septic systems. The findings and conclusions of the Phase II ESA shall become the basis for potential recommendations for follow-up investigation, site characterization, and/or remedial activities.

MM HAZ-2c In the event the findings and conclusions of the Phase II Environmental Site Assessment (Phase II ESA) reveal the presence of significant concentrations of hazardous materials warranting further investigation, the property owners and/or developers of properties shall ensure that site characterization shall be conducted in the form of additional Phase II ESAs in order to characterize the source and maximum extent of impacts from constituents of concern. The findings and conclusions of the site characterization shall become the basis for formation of a remedial action plan and/or risk assessment.

MM HAZ-2d If the findings and conclusions of the Phase II Environmental Site Assessment (Phase II ESA), site characterization and/or risk assessment demonstrate the presence of concentrations of hazardous materials exceeding regulatory threshold levels, prior to the issuance of a grading permit, property owners and/or developers of properties shall complete site remediation and potential risk assessment with oversight from the applicable regulatory agency including, but not limited to, the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) or Regional Water Quality Control Board (RWQCB), and Fresno County Environmental Health Division (FCEHD). Potential remediation could include the removal or treatment of water and/or soil. If removal occurs, hazardous materials shall be transported and disposed at a hazardous materials permitted facility.

MM HAZ-2e Prior to the issuance of a building permit for an individual property within the Master Plan Area 2 (MP Area 2) with residual environmental contamination, the agency with primary regulatory oversight of environmental conditions at such property ("Oversight Agency") shall have determined that the proposed land use for that property,

including proposed development features and design, does not present an unacceptable risk to human health, if applicable, through the use of an Environmental Site Management Plan (ESMP) that could include institutional controls, site-specific mitigation measures, a risk management plan, and deed restrictions based upon applicable risk-based cleanup standards. Remedial action plans, risk management plans and health and safety plans shall be required as determined by the Oversight Agency for a given property under applicable environmental laws, if not already completed, to prevent an unacceptable risk to human health, including workers during and after construction, from exposure to residual contamination in soil and groundwater in connection with remediation and site development activities and the proposed land use.

MM HAZ-2f For those sites with potential residual volatile organic compounds (VOCs) in soil, soil gas, or groundwater that are planned for redevelopment with an overlying occupied building, a vapor intrusion assessment shall be performed by a licensed environmental professional. If the results of the vapor intrusion assessment indicate the potential for significant vapor intrusion into the proposed building, the project design shall include vapor controls or source removal, as appropriate, in accordance with Regional Water Quality Control Board (RWQCB), the California Department of Toxic Substances Control (DTSC) or the Fresno County Environmental Health Division (FCEHD) requirements. Soil vapor mitigations or controls could include passive venting and/or active venting. The vapor intrusion assessment and associated vapor controls or source removal can be incorporated into the Environmental Site Management Plan (ESMP) (MM HAZ-2e).

MM HAZ-2g In the event of planned renovation or demolition of residential and/or commercial structures on the subject site, prior to the issuance of demolition permits, asbestos and lead-based paint (LBP) surveys shall be conducted in order to determine the presence or absence of asbestos-containing materials (ACM) and/or LBP. Removal of friable ACM, and non-friable ACMs that have the potential to become friable, during demolition and/or renovation shall conform to the standards set forth by the National Emissions Standards for Hazardous Air Pollutants (NESHAPs).

The San Joaquin Valley Air Pollution Control District (SJVAPCD) is the responsible agency on the local level to enforce the NESHAPs and shall be notified by the property owners and/or developers of properties (or their designee(s)) prior to any demolition and/or renovation activities. If asbestos-containing materials are left in place, an Operations and Maintenance Program (O&M Program) shall be developed for the management of asbestos-containing materials (ACM).

MM HAZ-2h Prior to the import of a soil to a particular property within the Master Plan Area 2 (MP Area 2) as part of that property's site development, such soils shall be sampled for toxic or hazardous materials to determine whether concentrations exceed applicable Environmental Screening Levels for the proposed land use at such a property, in

accordance with Regional Water Quality Control Board (RWQCB), the Fresno County Environmental Health Division (FCEHD), and the California Department of Toxic Substances Control (DTSC), including but not limited to the DTSC 2001 Information Advisory Clean Imported Fill Material Fact Sheet, which identifies land use activities appropriate for a fill material source area and provides guidelines for types of analyses to be performed, prior to importing to such a property.

Vista Ranch Development/MP Area 1

MM HAZ-2i Prior to the acceptance of improvements, the project proponent shall hire a licensed well contractor to obtain a well abandonment permit from Fresno County Department of Public Health Environmental Health Division, and properly abandon the on-site domestic water wells, septic and leach field system, propane fuel tanks, and irrigation and well pump, pursuant to review and approval of the City Engineer and the Fresno County Department of Public Health Environmental Health Division.

MM HAZ-2j Prior to any grading or construction activities in the vicinity of the abandoned Contractor's Corp Yard, removal of the 8-foot by 8-foot UST, including any associated pipes or wires, shall be undertaken in accordance with all applicable local, State and federal regulations.

MM HAZ-2k Prior to the issuance of any grading or building permits, the project applicant shall retain a qualified environmental professional to conduct a Phase II Limited Subsurface Survey (LSS) to assess the potential presence of an Underground Storage Tank (UST) on the project site. This investigation shall be performed in accordance with the recommendations outlined in the 2023 Phase I Environmental Site Assessment (2023 Phase I ESA), which identified the potential for a UST based on historical site use and visual indicators.

The Phase II LSS shall include, but not be limited to, geophysical testing (e.g., ground-penetrating radar), soil sampling, and laboratory analysis to determine the presence of petroleum hydrocarbons or other hazardous substances associated with USTs. If a UST is confirmed, the applicant shall prepare and implement a remediation plan in coordination with the appropriate regulatory agencies, including the Regional Water Quality Control Board (RWQCB) and the local Certified Unified Program Agency (CUPA). All investigative and remedial activities shall be prior to the issuance of any grading permits and shall comply with applicable federal, State, and local regulations.

Documentation of the completed Phase II LSS and any required remediation shall be submitted to the lead agency for review and approval prior to the issuance of any grading permits.

MM HAZ-2I The project proponent shall hire a qualified consultant to perform additional testing prior to the issuance of grading permits for construction activities in the following areas that have been deemed to have potentially hazardous conditions present:

- Prior to the disturbance of any suspect ACMs or LBP at the subject site, via renovation or demolition, comprehensive ACM and LBP surveys shall be required.
- During the removal of debris from the site in preparation for grading and construction activities associated with the proposed residential development, should indications of potential hazardous materials or evidence of impacted soil be observed, the applicant shall be contracted to determine whether surficial soils have been potentially impacted and whether sampling would be recommended. In addition, debris shall be removed and transported off-site for proper disposal.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Hazards associated with upset and accident conditions are localized in nature. Accordingly, the geographic scope for this cumulative analysis is limited to MP Area 2 and the immediate vicinity. Development of MP Area 2, in conjunction with cumulative development in the immediate vicinity, would include areas designated for a variety of uses as defined by the applicable General Plan. Cumulative development would include continued operation of, or development of, new facilities as allowed under each land use designation. New development would inevitably increase the use of hazardous materials within the region, resulting in potential health and safety effects related to hazardous materials use. For the most part, potential impacts associated with new and future development would be confined to commercial and industrial areas and would not involve the use of hazardous substances in large quantities or that would be particularly hazardous. Incidents, if any, would typically be site-specific and would involve accidental spills or inadvertent releases. Associated health and safety risks would generally be limited to those individuals using the materials or to persons in the immediate vicinity of the materials and would not combine with similar effects elsewhere (i.e., construction workers). Hazard-related impacts tend to be site-specific and project-specific. Therefore, cumulative impacts would be less than significant.

Development of MP Area 2 would not result in significant increased risks of hazards in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Mitigation measures have been included to reduce the risk of on-site hazards associated with the use of on-site hazardous materials. Development of MP Area 2 would have a less than significant cumulative impact relative to

this environmental topic. As such, impacts related to hazards and hazardous materials would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

Hazards associated with upset and accident conditions are localized in nature. Accordingly, the geographic scope for this cumulative analysis is limited to MP Area 1 and the immediate vicinity. Development of MP Area 1, in conjunction with cumulative development in the immediate vicinity, would include areas designated for a variety of uses as defined by the applicable General Plan. Cumulative development would include continued operation of, or development of, new facilities as allowed under each land use designation. New development would inevitably increase the use of hazardous materials within the region, resulting in potential health and safety effects related to hazardous materials use. For the most part, potential impacts associated with new and future development would be confined to commercial and industrial areas and would not involve the use of hazardous substances in large quantities or that would be particularly hazardous. Incidents, if any, would typically be site-specific and would involve accidental spills or inadvertent releases. Associated health and safety risks would generally be limited to those individuals using the materials or to persons in the immediate vicinity of the materials and would not combine with similar effects elsewhere (i.e., construction workers). Hazard-related impacts tend to be site-specific and project-specific. Additionally, all cumulative projects would be required to abide with the same federal, State, and local rules and regulations, such as the Hazardous Materials Transportation Act; Health and Safety Code; CCR Title 8, Sections 1529 and 1532.1, and Regulation VII of the SJVAPCD guidelines. Therefore, cumulative impacts would be less than significant.

The Vista Ranch Development would not result in significant increased risks of hazards in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Additionally, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the less than significant cumulative impacts because, as described above, development in MP Area 1 would be required to comply with MM HAZ-2i through MM HAZ-2l, which would reduce potential impacts related to the accidental release of hazardous materials. Therefore, the Vista Ranch Development would not result in a cumulatively considerable contribution to the already less than significant cumulative impacts.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Hazardous Emissions Proximate to a School

Impact HAZ-3: **The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the proposed SOI Expansion and Non-development Area would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. As such, no impacts would occur.

MP Area 2

The closest schools to the Master Plan Area are Woods Elementary School, approximately 1.5 miles southwest of the Master Plan Area; Dry Creek Elementary School, approximately 1.1 miles south of the Master Plan Area; and Bud Rank Elementary School, approximately 0.55 mile southeast of the Master Plan Area. None of these are within 0.25 mile of the Master Plan Area. As such, construction impacts would be less than significant.

The proposed Master Plan includes the development of a new elementary school. It is possible that the elementary school could be in operation prior to all construction being completed within the Master Plan Area. As discussed above, some sites within MP Area 2 could have residual contamination that may require remediation. Therefore, development within MP Area 2 could include land uses with the potential to emit hazardous emissions or handle hazardous materials and substances. It is anticipated that future development within MP Area 2 could occur within 0.25 mile of the future school. However, any future individual development projects that involve the transport, use, or disposal of hazardous materials would be subject to existing federal, State, and local regulations outlined in Section 3.9.3, Regulatory Framework. Future individual projects would be subject to City review, and an environmental site assessment would be required for proposed projects sited near schools.

Moreover, implementation of MM HAZ-2a through MM HAZ-2h would further reduce impacts related to schools. As stated in the discussions of Impacts HAZ-1 and HAZ-2, all future development within MP Area 2 would be required to achieve compliance with existing federal, State, and local regulations, procedures, and policies and would avoid potential impacts associated with hazardous materials handling, use, and storage in MP Area 2. Compliance with these regulations, procedures, and policies would ensure that hazardous materials are properly handled, thereby reducing potential risks to nearby schools. At the programmatic level, impacts related to the handling of hazardous materials near a school would be reduced to a less than significant level with the implementation of MP Area 2 MM HAZ-2a through MM HAZ-2h, as well as MM NOI-1a, which requires that construction staging areas are located at the greatest feasible distance from sensitive receptors.

Vista Ranch Development/MP Area 1

The closest schools to the Master Plan Area are Woods Elementary School, approximately 1.5 miles southwest from the Master Plan Area; Dry Creek Elementary School, approximately 1.1 miles south of the Master Plan Area; and Bud Rank Elementary school, approximately 0.55 miles southeast of the Master Plan Area. None of these are within 0.25 mile of the Master Plan Area. As such, construction impacts would be less than significant.

The proposed Master Plan includes the development of a new elementary school in MP Area 2, which could be in operation prior to all construction being completed within the Master Plan Area. As described above, the proposed residential and commercial uses are only expected to emit household and small commercial quantities of hazardous materials that would have a less than significant impact on the elementary school. Additionally, required implementation of MM HAZ-2i through MM HAZ-2l would reduce potential impacts from hazardous materials during construction if the future elementary school is in operation prior to full buildout of the Vista Ranch Development. Additionally, the proposed Vista Ranch Development would implement MM NOI-1a, which requires that construction staging areas are located at the greatest feasible distance from sensitive receptors. Impacts would be less than significant with mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2

Implement MM HAZ-2a through MM HAZ-2h and MM NOI-1a.

Vista Ranch Development/MP Area 1

Implement MM HAZ-2i through MM HAZ-2l and MM NOI-1a.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope of the cumulative impacts associated with emitting or handling hazardous materials in proximity to a school would include projects within 0.25 mile of existing or reasonably foreseeable future schools. This potential cumulative impact is limited to construction impacts. The

Master Plan Area is not within 0.25 mile of any existing schools. However, the proposed Master Plan would include the development of a future elementary school within MP Area 2. Cumulative Project No. 28 is located within 0.25 mile of the future elementary school site but is already under construction. Therefore, Cumulative Project No. 28 is expected to be in operation by the time the future elementary school begins construction and therefore would not contribute to cumulative impacts.

Nonetheless the construction of cumulative projects within MP Area 2 could occur after the proposed school is operational because the transport of hazardous materials in proximity to the surrounding schools and future foreseeable development could occur within vacant lots in proximity to the Master Plan Area and within 0.25 mile of the surrounding schools. However, any cumulative projects would be required to comply with the same federal, State, and local regulations on the transportation and handling of hazardous materials. Therefore, the proposed Master Plan would not result in a cumulatively considerable contribution to the less than significant cumulative impact with regard to emitting hazardous materials within 0.25 mile of a school and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The geographic scope of the cumulative impacts of emitting or handling hazardous materials in proximity to a school would be within 0.25 mile of existing or reasonably foreseeable future schools. The Master Plan Area is not within 0.25 mile of any existing schools. However, the proposed Master Plan would include the development of a future elementary school within MP Area 2. Cumulative Project No. 28 is located within 0.25 mile of the future elementary school site but is already under construction. Therefore, Cumulative Project No. 28 is expected to be in operation by the time the future elementary school begins construction and therefore would not contribute to cumulative impacts.

Nonetheless the construction of cumulative projects within MP Area 2 could occur after the proposed school is operational because the transport of hazardous materials in proximity to the surrounding schools and future foreseeable development could occur within vacant lots in proximity to the Master Plan Area and within 0.25 mile of the surrounding schools. However, any cumulative projects would be required to comply with the same federal, State, and local regulations on the transportation and handling of hazardous materials. Therefore, the proposed Vista Ranch Development would not result in a cumulatively considerable impact with regard to emitting hazardous materials within 0.25 mile of a school, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Government Code Section 65962.5 Sites

Impact HAZ-4: **The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the Non-development Area is not located on a site which is on a list of hazardous materials compiled pursuant to Government Code Section 65962.5. As such, no impact would occur.

MP Area 2

MP Area 2 is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, no impact would occur.

Vista Ranch Development/ MP Area 1

MP Area 1 is not listed in any other State list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, the Vista Ranch Development would not create a significant hazard to the public or the environment as a result of being included on such a list. As such, no impact would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to any of the City's thresholds related to development on a site that is listed as a hazardous material site pursuant to Government Code Section 65962.5. Accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Proximity to Public Airport Safety Hazard

Impact HAZ-5:	**For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the proposed project would not result in a safety hazard or excessive noise for people residing or working the project area.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, there are no documented public airports or public use airports within proximity to the SOI Expansion Area. The nearest airport facility within the vicinity of the SOI Expansion Area is the Fresno Yosemite International Airport, located approximately 6.5 miles southwest of the SOI Expansion Area. The SOI Expansion Area is not located within the airport influence area or within the airport's noise exposure contours for the Fresno Yosemite International Airport as identified in the Airport Land Use Compatibility Plan (ALUCP). As such, no impact would occur.

MP Area 2

As discussed above, the nearest airport facility to the Master Plan Area is the Fresno Yosemite International Airport, located approximately 6.5 miles southwest of the Master Plan Area. The Master Plan Area is not located within the airport influence area or within the airport's noise exposure contours for the Fresno Yosemite International Airport as identified in the ALUCP. As such, no impact would occur.

Vista Ranch Development/MP Area 1

As discussed above, the nearest airport facility to the Master Plan Area is the Fresno Yosemite International Airport, located approximately 6.5 miles southwest of the Master Plan Area. MP Area 1 is not located within the airport influence area or within the airport's noise exposure contours for the Fresno Yosemite International Airport as identified in the ALUCP. As such, no impact would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to any of the City's thresholds related to airport hazards. Accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Emergency Response and Evacuation

Impact HAZ-6:	**The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. As such, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, no impact would occur.

MP Area 2

The Fresno County Hazard Mitigation Plan underwent a comprehensive update in 2024, building upon the plan that was originally developed in 2018. This plan demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decision-makers direct mitigation activities and resources.

MP Area 2 is located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. The Big Dry Creek Dam is under the oversight of the DSOD. Big Dry Creek Dam is classified as an Extremely High Hazard Potential Classification by the DSOD. Under SB 92, dams with significant, high, or extremely high hazard risk are required to prepare and maintain an EAP. As such, Big Dry Creek Dam is equipped with an EAP to guide response efforts and protect downstream communities. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. The proposed Master Plan would not result in actions that could result in a higher likelihood of dam failure at Big Dry Creek Dam or impairment of the EAP in the event of dam failure. There will always be a remote chance of dam failure that results in flooding within dam inundation areas, including the Master Plan Area and other surrounding areas. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered

to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event.

In Fresno County, all major roads are available for evacuation, depending on the location and type of emergency that arises. The proposed Master Plan does not include any actions that would impair or physically interfere with any of Fresno County's emergency plans or evacuation routes. Future uses within MP Area 2 would have access to the County resources that establish protocols for safe use, handling, and transport of hazardous materials. Construction activities are not expected to result in any unknown significant road closures, traffic detours, or congestion that could hinder emergency vehicle access or evacuation in the event of an emergency. Any construction project that could involve road closures, traffic detours, and congestion would be required to obtain traffic control plans approved by the City as the Lead Agency. Therefore, development of the proposed Master Plan within MP Area 2 would have a less than significant impact.

Vista Ranch Development/MP Area 1

As discussed above, the proposed Vista Ranch Development would be subject to applicable policies and regulations within the Fresno County Hazard Mitigation Plan and would not impair the Big Dry Creek Dam EAP. Additionally, all major roads would be available for evacuation, depending on the location and type of emergency that arises. The proposed Vista Ranch Development does not include any actions that would impair or physically interfere with any of Fresno County's emergency plans or evacuation routes. The Vista Ranch Development would have access to the County resources that establish protocols for safe use, handling, and transport of hazardous materials. Construction activities are not expected to result in any unknown significant road closures, traffic detours, or congestion that could hinder emergency vehicle access or evacuation in the event of an emergency. Any construction project that could involve road closures, traffic detours, and congestion would be required to obtain traffic control plans approved by the City as the Lead Agency. Therefore, development of the proposed Vista Ranch Development would have a less than significant impact.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope is the project area and immediate adjacent transportation and evacuation routes. As previously mentioned, the City does not currently have an evacuation plan in place. However, development within the City would be subject applicable policies and regulations within the Fresno County Hazard Mitigation Plan and the City's Emergency Operations Plan (EOP). As such, the geographic scope of the cumulatively considerable impact related to impairing or interfering with an emergency response plan or evacuation plan would be the City. The simultaneous construction of the multiple cumulative projects could temporarily interfere with the Fresno County Hazard Mitigation Plan or the City's EOP. Evacuation routes that multiple cumulative projects would use are arterial roadways that connect to major freeways. In addition, cumulative projects would be required to abide by the California Fire Code and CBC standards on fire access apparatus roads and fire safety design features, including local regulations on construction activities interfering with the public right-of-way. Since cumulative projects would adhere to State and local regulations, the proposed Master Plan would not result in a cumulatively considerable contribution related to interfering with or impairing an emergency response or evacuation plan and the cumulative impact would be less than significant.

Vista Ranch Development/MP Area 1

The geographic scope is the project area and immediate adjacent transportation and evacuation routes. As previously mentioned, the City does not currently have an evacuation plan in place. However, development within the City would be subject applicable policies and regulations within the Fresno County Hazard Mitigation Plan and the City's EOP. As such, the geographic scope of the cumulatively considerable impact related to impairing or interfering with an emergency response plan or evacuation plan would be the City. The simultaneous construction of the multiple cumulative projects could temporarily interfere with the Fresno County Hazard Mitigation Plan or the City's EOP Evacuation routes that multiple cumulative projects would use are arterial roadways that connect to major freeways. In addition, cumulative projects would be required to abide by the California Fire Code and CBC standards on fire access apparatus roads and fire safety design features, including local regulations on construction activities interfering with the public right-of-way. Since cumulative projects would adhere to State and local regulations, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution related to interfering with or impairing an emergency response or evacuation plan and the cumulative impact would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Wildland Fires

Impact HAZ-7: The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the SOI Expansion Area is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. As such, no impact would occur.

MP Area 2

Wildfires are a potential hazard to development, including land uses located in the foothill and forested areas of the City. The severity of wildfire problems depends on a combination of vegetation, climate, slope, and people. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of Fresno County. In addition to natural factors such as lightning, human activity is a primary factor contributing to the incidence of wildfires. Campfires, smoking, debris burning, arson, public utility infrastructure, and equipment use are common human-related causes of wildfires.

According to the General Plan, portions of the SOI Expansion Area, including portions of the Master Plan Area, are located within a Moderate FHSZ. The nearest VHFHSZ to the SOI Expansion Area is located in an LRA and is approximately 3 miles north of the proposed SOI boundary.

The proposed Master Plan would involve grading and clearing of the vegetation on-site to develop it with residential uses, and as such, the likelihood of risk from wildfires would not increase as a result of wildland fires. Furthermore, future development within MP Area 2 would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All plans would be reviewed for approval by the appropriate agencies. Therefore, the proposed Master Plan would have a less than significant impact.

Vista Ranch Development/MP Area 1

As discussed above, MP Area 1 is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. Portions of the SOI Expansion Area, including portions of the Vista Ranch Development, are located within a Moderate FHSZ. The proposed Vista Ranch Development would involve grading and clearing of the site to develop it with residential uses, and as such, the proposed project would reduce the available fuel load, which, in turn, would reduce fire potential. Additionally, implementation of regular construction site watering consistent with standard construction BMPs would reduce risks associated with wildfire caused by unintentional equipment sparks during grading. Standard construction best management practices would also support the suppression of fire sources and appropriate response should fire result during construction activities.

Future development on the site would include fire-resistant structures consistent with the most recent CBC and fire codes as well as internal circulation elements that would act as fire breaks. As such, MP Area 1, with continued maintenance, would be less flammable, ignitable, and conducive to fire spread, relative to current pre-project conditions. Additionally, the Vista Ranch Development would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure, the implementation of an irrigated, drought-resistant landscaping plan, and the development of defensible space. Furthermore, the 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. According to the Water Infrastructure Investigation prepared for the Master Plan Area, water infrastructure would exceed the minimum fire flow and residual pressure required by the CFD, with its recommendations integrated into the project design. As such, the planned water distribution system for the proposed project would be adequate to convey water supply and support anticipated demands for the proposed project. Accordingly, the likelihood of risk from wildfires would not increase as a result of wildland fires. Furthermore, the proposed Vista Ranch Development would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All plans would be reviewed for approval by the appropriate agencies. Therefore, the proposed Vista Ranch Development would have a less than significant impact.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

With respect to the potentially cumulative risk related to wildfire, the potential hazard to development is present in various areas of the County, particularly in areas with an abundance of fuel (i.e., grassland) and in the foothill areas of the County. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of Fresno County. The Master Plan Area is not categorized as a VHFHSZ or SRA, and increased development on the Master Plan Area and surrounding areas would result in a decrease in wildfire risk as sites would be graded and cleared of fuel. Furthermore, as with MP Area 2, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage

Development of MP Area 2 would not result in significant increased risks of wildfire in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Development of MP Area 2 would have a less than significant cumulative impact relative to this environmental topic. As such, impacts related to wildland fires would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

As discussed above, with respect to the potentially cumulative risk related to wildfire, the potential hazard to development is present in various areas of the County, particularly in areas with an abundance of fuel (i.e., grassland) and in the foothill areas of the County. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of Fresno County. MP Area 1 is not categorized as a VHFHSZ or SRA, and increased development on MP Area 1 and surrounding areas would result in a decrease in wildfire risk as the site would be graded and cleared of fuel. Furthermore, as with the proposed Vista Ranch Development, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. Since the cumulative projects, including the proposed project, would adhere with the California Fire Code and CBC standards, the proposed project's incremental contribution to direct or indirect exposure to wildland fires would not be cumulatively considerable, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.10 - Hydrology and Water Quality

3.10.1 - Introduction

This section describes the existing hydrology and water quality setting and potential effects from project implementation on the site and its surrounding area. Descriptions and analyses in this section are based, in part, on the City of Clovis General Plan (General Plan), the General Plan and Development Code Update Environmental Impact Report (General Plan EIR), the City of Clovis Municipal Code (CMC), the Fresno-Clovis Storm Water Quality Management Program, the 2020 Clovis Urban Water Management Plan (UWMP), the Water Supply Assessment (WSA) prepared by Provost & Pritchard Consulting Group dated September 2025 (Appendix I.1), and the Vista Ranch Development – Evaluation of Impacts to Groundwater Levels Memorandum (Appendix I.2).

The following public comments were received during the Revised Draft Environmental Impact Report's (Revised Draft EIR's) Notice of Preparation (NOP) scoping period related to the proposed project's potential hydrologic impacts.

- Comment stating that any additional stormwater discharges into Fresno Irrigation District (FID) facilities shall be determined and agreed upon prior to FID approval. (pp. 3.10-30 to 3.10-36)
- Comment stating Fresno Metropolitan Flood Control District's (FMFCD's) Big Dry Creek No. 150 shall be given an ample-sized open space corridor with proper channel geometry to maintain a flow capacity of up to 150 cubic-feet per second. (pp. 3.10-51 to 3.10-57)
- Comment(s) expressing concerns that the proposed project would negatively impact local groundwater supplies and contribute to existing groundwater overdraft and recommends that the City of Clovis (City) require sufficient recharge or imported surface water. (pp. 3.10-36 to 3.10-43)
- Comment providing information related to the Sustainable Groundwater Management Act (SGMA) and requesting the City consider potential impacts on the City's ability to comply with the SGMA. (pp. 3.10-36 to 3.10-43; 3.10-57 to 3.10-60)
- Comment requesting that the Revised Draft EIR thoroughly discuss infrastructure improvements to manage potential flooding and provide a thorough analysis of potential flooding resulting from a dam breach. (pp. 3.10-51 to 3.10-57)
- Comment requesting that Revised Draft EIR include a dam inundation study. (pp. 3.10-51 to 3.10-57)
- Comment stating that the proposed project shall pay FMFCD drainage fees pursuant to the Drainage Fee Ordinance prior to approval of any final maps and/or issuance of building permits at the rates in effect at the time of such approval. (pp. 3.10-30 to 3.10-33)
- Comment stating applicable requirements for the proposed project related to stormwater drainage. (pp. 3.10-30 to 3.10-33; 3.10-47 to 3.10-48)

- Comment stating that all impacts to stormwater runoff created by increasing densities within Drainage Area "BY1" that affect the capacity of the existing rural drainage system must be fully mitigated. (pp. 3.10-47 to 3.10-48)
- Comment requesting that the grading engineer contact FMFCD as early as possible to review the proposed site grading for verification and acceptance of a mitigation design prior to preparing a grading plan within the Master Plan Area. (pp. 3.10-45 to 3.10-48)
- Comment recommending that the 250-foot area adjacent to the dam face be kept clear of development and designated as open space. (pp. 3.10-52 to 3.10-54)
- Comment recommending a 500-foot open space corridor buffer from the toe of the Big Dry Creek Reservoir along the Master Plan Area to Shepherd Avenue, unless the developer provides a Geotechnical Report which recommends that development closer than 500-feet is feasible. (pp. 3.10-52 to 3.10-54)
- Comment requesting an opportunity to review the application prior to submittal of a United States Army Corps of Engineers (USACE) Clean Water Act Section 404 permit application package, if prepared. (pp. 3.10-30 to 3.10-36)
- Comment stating requirements if developer chooses to retain, relocate, or improve channels within the Master Plan Area. (pp. 3.10-45 to 3.10-48)
- Comment recommending that the Master Plan Area establishes a Homeowner's Association (HOA) to maintain drainage channels. (pp. 3.10-45 to 3.10-48)
- Comment requesting information on what plans are in place for groundwater recharge or downstream replenishment to mitigate potential increased withdrawals. (pp. 3.10-36 to 3.10-43)
- Comment requesting information on how the City would manage the reliance on groundwater for the project area. (pp. 3.10-36 to 3.10-43)
- Comment requesting information on where the ponding basin would be for the proposed project and suggesting that the proposed project include at least 3 to 4 ponding tables for water recharge. (pp. 3.10-36 to 3.10-43)
- Comment requesting information on how the proposed project would affect future well drilling. (pp. 3.10-36 to 3.10-43)
- Comment stating concern about whether discharge would be allowed into the existing canal. (pp. 3.10-30 to 3.10-36)
- Comment requesting information regarding whether water pumps can drill in the water basin east of the Dry Creek dam. (pp. 3.10-36 to 3.10-43)
- Comment(s) stating concern related to groundwater supply and recharge and states there must be a plan for an upgradient water basin. (pp. 3.10-36 to 3.10-43)
- Comment(s) stating concern related to an increase in water pollution. (pp. 3.10-30 to 3.10-36)
- Comment(s) requesting analysis of how additional groundwater pumping for the proposed residential uses would affect existing private wells in the community. (pp. 3.10-36 to 3.10-43)

- Comment(s) requesting monitoring and mitigation plans for potential well failures similar to those experienced near the Shepherd and Sunnyside development in the City. (pp. 3.10-36 to 3.10-43)
- Comment requesting verification that the proposed project complies with requirements under the SGMA given the critically overdrafted status of the basin. (pp. 3.10-36 to 3.10-43; 3.10-57 to 3.10-58)
- Comment(s) requesting evidence that the City has considered cumulative impacts of all planned developments in the area on groundwater supplies. (pp. 3.10-41 to 3.10-43)
- Comment stating concern about the increase of population and states the SOI Expansion Area has been left open as a buffer and opposes development near the dam. (pp. 3.10-51 to 3.10-54)
- Comment requesting water impacts be outlined in detail and transparent. (pp. 3.10-30 to 3.10-60)
- Comment(s) stating concerns related to groundwater supply for private wells in the project vicinity. (pp. 3.10-36 to 3.10-43)

3.10.2 - Environmental Setting

Regional Hydrology

The Sphere of Influence (SOI) Expansion Area is located within the San Joaquin Valley, which is surrounded on the west by the Coast Ranges, on the south by the San Emigdio and Tehachapi Mountains, on the east by the Sierra Nevada mountain range, and on the north by the Sacramento-San Joaquin Delta (Delta) and Sacramento Valley.[1] The northern portion of the San Joaquin Valley drains toward the Delta by the San Joaquin River and its tributaries: the Fresno, Merced, Tuolumne, and Stanislaus Rivers. The southern portion of the valley is internally drained by the Kings, Kaweah, Tule, and Kern Rivers that flow into the Tulare drainage basin, including the beds of the former Tulare, Buena Vista, and Kern Lakes.

The San Joaquin and Kings Rivers are the two principal rivers within or bordering the Kings Subbasin, where the SOI Expansion Area is located.[2] The Fresno Slough and James Bypass are along the western edge of the subbasin and connect the Kings River with the San Joaquin River. Average annual precipitation values range from 7 to 10 inches, increasing eastward.

[1] California Department of Water Resources (DWR). 2006. California's Groundwater (Bulletin 118), San Joaquin Valley Groundwater Basin Kings Subbasin. Website: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_022_01_EasternSanJoaquinSubbasin.pdf. Accessed May 15, 2025.

[2] California Department of Water Resources (DWR). 2006. California's Groundwater (Bulletin 118), San Joaquin Valley Groundwater Basin Kings Subbasin. Website: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_022_01_EasternSanJoaquinSubbasin.pdf. Accessed May 15, 2025.

Watersheds

A watershed is a region that is bound by a divide that drains to a common watercourse or body of water. Watersheds serve an important biological function, oftentimes supporting an abundance of aquatic and terrestrial wildlife including special-status species and anadromous and native local fisheries. Watersheds provide conditions necessary for riparian habitat.

Watersheds are delineated by the United States Geological Survey (USGS) using a nationwide system based on surface hydrologic features.[3] These hydrologic units are classified into four levels (regions, subregions, accounting units, and cataloging units), with each unit being identified by a unique hydrologic unit code (HUC) based on its level within the hierarchical system. This means that boundaries are defined according to size and topography, with multiple sub-watersheds within larger watersheds. The USGS system divides the United States into regions (HUC-2), subregions (HUC-4), basins (HUC-6), subbasins (HUC-8), watersheds (HUC-10), and sub-watersheds (HUC-12).

Exhibit 3.10-1 shows the principal watersheds in the area. As shown, the SOI Expansion Area is located within the Dry Creek and James Bypass Watersheds (HUC-10) within the Upper Dry Subbasin (HUC-8) of the Tulare-Buena Vista Lakes Basin (HUC-6).

Groundwater

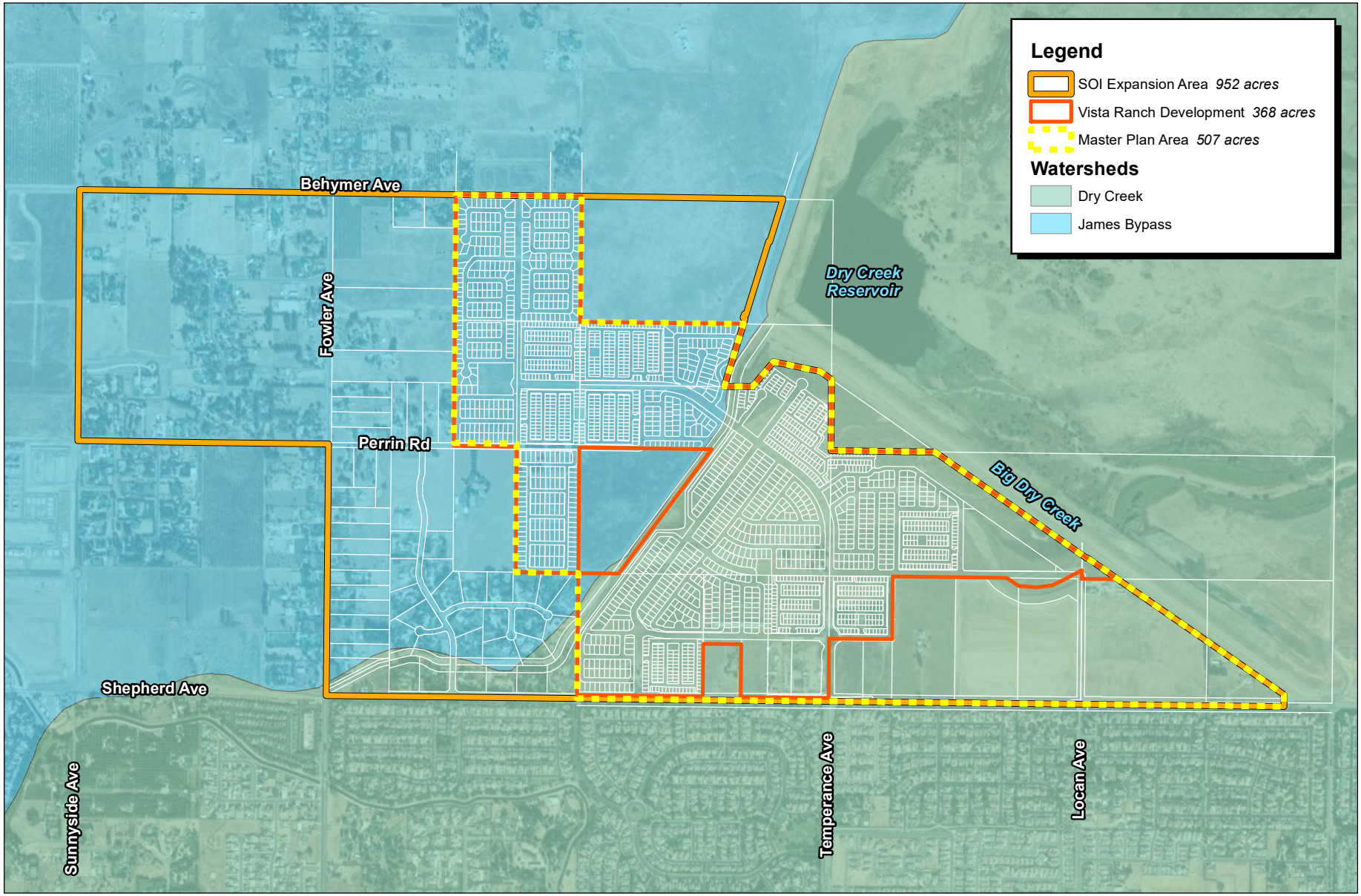
The City of Clovis is underlain by the Kings Groundwater Subbasin.[4] The Kings Subbasin is bounded on the north by the San Joaquin River, on the west by the Delta-Mendota and Westside Subbasins, the south by the Kings River South Fork and the Empire West Side Irrigation District, and on the east by the Sierra Nevada foothills.[5] The Kings Subbasin covers a surface area of approximately 1,530 square miles. The two principal rivers overlying the subbasin are the San Joaquin River and Kings River. The Fresno Slough and James Bypass are located along the western edge of the southern basin and connect the Kings River to the San Joaquin River. The Kings Subbasin contains multiple interconnected subbasins that transmit, filter, and store water: the Kaweah and Tulare Lake subbasins to the south; Westside and Delta-Mendota subbasins to the west; and Madera Subbasin to the north.[6]

[3] United States Geological Survey (USGS). 2025. Hydrologic Unit Maps: What area Hydrologic Units? Website: https://water.usgs.gov/themes/hydrologic-units/. Accessed May 15, 2025.

[4] California Department of Water Resources (DWR). 2025. Basin Boundaries Data Viewer. Website: https://www.arcgis.com/apps/mapviewer/index.html?url=https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_B118_CA_GroundwaterBasins/FeatureServer. Accessed May 15, 2025.

[5] California Department of Water Resources (DWR). 2006. California's Groundwater (Bulletin 118), San Joaquin Valley Groundwater Basin Kings Subbasin. Website: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_022_01_EasternSanJoaquinSubbasin.pdf. Accessed May 15, 2025.

[6] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.



Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. California Division of Land Resource Protection.

1,500 750 0 1,500 Feet

Exhibit 3.10-1
Watershed Map

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Groundwater recharge to the subbasin occurs from river and stream seepage, deep percolation of irrigation water, canal seepage, and intentional recharge.[7]

Local Setting

The SOI Expansion Area is located directly north of the City of Clovis limit line in unincorporated Fresno County. The SOI Expansion Area is bounded on the north by East Behymer Avenue, on the east by the Big Dry Creek Reservoir, on the south by East Shepherd and East Perrin Avenues, and on the west by North Fowler and North Sunnyside Avenues. The SOI Expansion Area is within portions of Sections 21, 22, and 23 of Township 12 South, Range 21 East, Mount Diablo Base and Meridian. The SOI Expansion Area is characterized as flat to gently sloping southerly and westerly, with elevations varying from approximately 385 to 400 feet above mean sea level (AMSL). There is a knoll at the northeast corner of the project area that varies in elevation from 395 to 440 feet AMSL.

The SOI Expansion Area consists of a combination of fallow and grazing land, several rural residences, offices, abandoned Contractor's Corp Yard, and a small, abandoned tree nursery. Within the SOI Expansion Area, the Non-development Area contains existing rural residential uses and agricultural fields.

Surface Water and Flood Control Facilities

Local Surface Waters and Drainage

As indicated in the Clovis General Plan EIR, the Clovis General Plan study area is within the drainages of three streams: Dry Creek, Dog Creek, and Redbank Slough.[8] The Big Dry Creek Reservoir and Dam are located northeast of the SOI Expansion Area. The Master Plan Area is bisected by the Big Dry Creek Reservoir Outlet Works Channel fed by the Big Dry Creek Dam. When the dam was constructed, the natural Dry Creek drainage was re-routed into the reservoir basin; flow now exits via the channel and is conveyed via the channel to rejoin the Creek about 2,500 feet below the outlet. The truncated and abandoned channel of Dry Creek remains a conspicuous feature in the east-central portion of the site but no longer conveys flow, all of which has been re-routed via the reservoir, dam, outlet works, and channel. The remnant creek channel exhibits intermittent stream geomorphology but lacks an ordinary high water mark (OHWM). It does not have hydric soils and supports only upland vegetation.

The Big Dry Creek Reservoir Outlet Works Channel is a man-made channel that conveys controlled stormwater releases from Big Dry Creek Reservoir until it converges with the native stream course of

[7] California Department of Water Resources (DWR). 2006. California's Groundwater (Bulletin 118), San Joaquin Valley Groundwater Basin Kings Subbasin. Website: https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/5_022_01_EasternSanJoaquinSubbasin.pdf. Accessed May 15, 2025.

[8] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report, Chapter 5.9, Hydrology and Water Quality. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-09-Hydrology-and-Water-Quality.pdf?t=202507181312560. Accessed May 15, 2025.

Big Dry Creek near the southwest corner of MP Area 1.[9] In addition, Behymer Tributaries MID-1 and MID-4 are water courses that traverse MP Area 1. Behymer Tributaries MID-2 and MID-3 are water courses that are located within the Non-development Area.

The SOI Expansion Area is located within the service area of the FMFCD.[10] The FMFCD provides flood control and urban stormwater services in a 399-square-mile watershed located between the Kings and San Joaquin Rivers.[11] The Fresno/Clovis urban area is served by a system of roughly 700 miles of pipeline and more than 150 stormwater retention basins. FMFCD's stormwater drainage system consists of interconnected surface conveyances, storm drains, detention basins (stormwater basins), pump stations, and outfalls.[12] The stormwater basins discharge to groundwater, irrigation canals, creeks, and the San Joaquin River. The system is designed to retain and infiltrate as much runoff as possible into the underlying groundwater aquifer. On average, FMFCD's regional stormwater basin system captures 92 percent of annual rainfall, of which 70–85 percent of the captured stormwater runoff is recharged into the local groundwater aquifer.[13] The stormwater basins also remove 50–80 percent of the typical stormwater pollutants.

The FMFCD Master Plan storm drainage pipeline system is designed to accept the peak flow rate of runoff from a 2-year intensity storm event (a storm that has a 50 percent probability of occurring in any given year).[14] When storm events occur that exceed the 2-year intensity, ponding begins to occur in the streets until the pipeline system can remove the water. If the storm is of sufficient intensity to generate more water than the street can store, the water will continue to rise until it reaches a topographic outlet where it can escape downgradient. This escape route is a feature of the major storm routing system, implemented in 1998, that protects properties from damage in rainfall or runoff events that exceed system design capacities.

Most of the SOI Expansion Area is located within Drainage Areas BY1 (western portion of SOI Expansion Area) and BX (eastern portion of SOI Expansion Area); a small portion of the SOI

[9] Fresno Metropolitan Flood Control District (FMFCD). 2025. Fresno Metropolitan Flood Control District Comments for Notice of Preparation of an Environmental Impact Report for Vista Ranch Project. March 20.

[10] Fresno Metropolitan Flood Control District (FMFCD). 2025. Flood Control Program. Website: https://www.fresnofloodcontrol.org/wp-content/uploads/2022/09/Flood-Control-Program-Fact-Sheet.pdf. Accessed May 15, 2025.

[11] Fresno Metropolitan Flood Control District (FMFCD). 2025. About Fresno Metropolitan Flood Control District. Website: https://www.fresnofloodcontrol.org. Accessed May 15, 2025.

[12] Fresno Metropolitan Flood Control District (FMFCD). 2013. Fresno-Clovis Storm Water Quality Management Program. Website: https:/www.fresnofloodcontrol.org/wp-content/uploads/2022/09/Stormwater-Quality-Management-Plan.pdf. Accessed May 15, 2025.

[13] Fresno Metropolitan Flood Control District (FMFCD). 2020. Fresno-Clovis Storm Water Quality Management Program FY 2019–20 Annual Report. Website: https://www.fresnofloodcontrol.org/wp-content/uploads/2022/09/Fresno-Clovis-Storm-Water-Quality-Management-Program-2019-2020-Annual-Report.pdf. Accessed May 15, 2025.

[14] Fresno Metropolitan Flood Control District (FMFCD). 2024. Annual Budget Fiscal Year Ending June 30, 2025. Website: https://www.fresnofloodcontrol.org/wp-content/uploads/2024/07/2024-2025-Budget6-2024-hearing-print-form.pdf. Accessed May 15, 2025.

Expansion Area, located in the southern portion near East Shepherd Avenue, is located within Drainage Area BT.[15]

Surface Water Quality

Surface water quality is affected by point source and non-point source pollutants. Point source pollutants are those emitted at a specific point, such as a pipe, while non-point source pollutants are typically generated by surface runoff from diffuse sources, such as streets, paved areas, and landscaped areas. Point source pollutants are controlled with pollutant discharge regulations or waste discharge requirements. Non-point source pollutants are more difficult to monitor and control, although they are important contributors to surface water quality in urban areas.

Stormwater runoff pollutants vary based on land use, topography, the amount of impervious surface, and the amount and frequency of rainfall and irrigation practices. Runoff in developed areas typically contains oil, grease, and metals accumulated in streets, driveways, parking lots, and rooftops, as well as pesticides, herbicides, particulate matter, nutrients, animal waste, and other oxygen-demanding substances from landscaped areas. The highest pollutant concentrations usually occur at the beginning of the wet season during the “first flush.”

Water quality in Fresno County is governed by the Central Valley Regional Water Quality Control Board (RWQCB) (Region 5), which sets water quality standards in the Water Quality Control Plan (Basin Plan). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses.

303(D) Impaired Water Bodies

Section 303(d) of the federal Clean Water Act (CWA) requires states to identify water bodies that do not meet water quality standards or objectives and are thus considered impaired. States are required to include a priority ranking of such waters, taking into account the severity of the pollution and the uses to be made of such waters, including waters targeted for the development of a total maximum daily load (TMDL).[16] A TMDL is an estimate of the daily load of pollutants that a water body may receive from point sources, non-point sources, and natural background conditions (including an appropriate margin of safety), without exceeding its water quality standard. The purpose of TMDLs is to ensure that beneficial uses are restored and that water quality objectives are achieved.

Several waterbodies within Fresno County are included on the Section 303(d) list, including the San Joaquin River (Friant Dam to Mendota Pool), which is listed as impaired for invasive species, pH,

[15] Fresno Metropolitan Flood Control District (FMFCD). 2025. Fresno Metropolitan Flood Control District Map. Website: https://www.arcgis.com/apps/webappviewer/index.html?id=5ac65186b1794949a1fda62ca7734986. Accessed May 15, 2025.

[16] California State Water Resources Control Board (State Water Board). 2024. Final Staff Report, 2023-2024 Integrated Report for Clean Water Act Sections 303 (d) and 305 (b). Website: https://www.waterboards.ca.gov/water_issues/programs/tmdl/2023_2024state_ir_reports/2024-integrated-report-final-staff-report.pdf. Accessed May 15, 2025.

temperature, and water.[17] Big Dry Creek, via Herndon Canal, indirectly drains into the San Joaquin River.[18]

Groundwater Resources

Groundwater Supply

The Kings Subbasin underlies the City of Clovis and the SOI Expansion Area and is part of the San Joaquin Valley Groundwater Basin.[19] The Kings Subbasin is not adjudicated,[20] meaning the groundwater rights within the subbasin have not been determined by a court. Additionally, the Kings Subbasin is designated as a high-priority basin by the California Department of Water Resources (DWR) and is considered critically overdrafted.[21] As such, the Kings Subbasin is required to submit and implement a Groundwater Sustainability Plan (GSP), pursuant to SGMA. Groundwater in the subbasin is managed by the North Kings Groundwater Sustainability Agency (NKGSA).[22]

North Kings Groundwater Sustainability Agency

The City of Clovis and County of Fresno are both members of the NKGSA. The NKGSA is one of seven Groundwater Sustainability Agencies (GSAs) within the Kings Subbasin and manages the northeast portion of the subbasin.[23] Each GSA in the Kings Subbasin prepares its own GSP. The

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[17] California State Water Resources Control Board (State Water Board). 2024. California Integrated Report. Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html. Accessed May 15, 2025.

[18] Fresno Metropolitan Flood Control District (FMFCD). 2013. Fresno-Clovis Storm Water Quality Management Program. Website: https://www.fresnofloodcontrol.org/wp-content/uploads/2022/09/Stormwater-Quality-Management-Plan.pdf. Accessed May 15, 2025.

[19] California Department of Water Resources (DWR). 2025. Basin Boundaries Data Viewer. Website: https://www.arcgis.com/apps/mapviewer/index.html?url=https://gis.water.ca.gov/arcgis/rest/services/Geoscientific/i08_B118_CA_GroundwaterBasins/FeatureServer. Accessed May 15, 2025.

[20] North Kings Groundwater Sustainability Agency (NKGSA). 2025. Groundwater Sustainability Plan 2025 Update. Website: https://provostandpritchard-my.sharepoint.com/personal/rquist_ppeng_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP%2FNKGSA%20GSP%202025%20Update%20Secure%2Epdf&parent=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP&ga=1. Accessed May 15, 2025.

[21] California Department of Water Resources (DWR). 2025. SGMA Basin Prioritization Dashboard. Website: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed May 15, 2025.

[22] North Kings Groundwater Sustainability Agency (NKGSA). 2025. Groundwater Sustainability Plan 2025 Update. Website: https://provostandpritchard-my.sharepoint.com/personal/rquist_ppeng_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP%2FNKGSA%20GSP%202025%20Update%20Secure%2Epdf&parent=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP&ga=1. Accessed May 15, 2025.

[23] North Kings Groundwater Sustainability Agency (NKGSA). 2025. Groundwater Sustainability Plan 2025 Update. Website: https://provostandpritchard-my.sharepoint.com/personal/rquist_ppeng_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP%2FNKGSA%20GSP%202025%20Update%20Secure%2Epdf&parent=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP&ga=1. Accessed May 15, 2025.

NKGSA is working collaboratively under a coordination agreement with the other six GSAs in the Kings Subbasin to achieve sustainable groundwater conditions by 2040, in accordance with SGMA.

SGMA identifies six sustainability indicators to be monitored and reported to document sustainability: lowering groundwater levels, reduced groundwater storage, seawater intrusion, degraded groundwater quality, land subsidence, and surface water depletion. The NKGSA documents and is responsible for implementing sustainability measures for all these indicators, except for seawater intrusion, which is not applicable to the Kings Subbasin due to its distance from the Pacific Ocean.

City-produced Groundwater

The City's water system relies on three main water supply sources: groundwater, surface water, and recycled water.[24] It should be noted that, for the proposed project, the City would rely more on surface water than groundwater in accordance with the UWMP. However, for full context of the City's available water sources, the following discussion of groundwater is provided.

In 2020, groundwater provided nearly half (49 percent) of the total potable water use. The City's groundwater system contains more than 30 wells with a total capacity of approximately 37,690 gallons per minute (gpm), with another 4,750 gpm of additional capacity planned. Several wells are off-line or on standby due to water quality concerns or are inactive as a result of being dry or producing too much sand.

Recharging the underground aquifer is an important aspect in the use of groundwater for supply and is one of the means to address basin overdraft.[25] According to the North Kings GSP, existing recharge areas within the NKGSA area include both natural areas and constructed recharge basins. Natural recharge occurs from seepage from the San Joaquin River, Kings River, and intermittent streams.[26] Natural recharge from percolation of precipitation is considered minor. Several agencies engage in groundwater recharge efforts, including seepage in unlined canals, reservoirs, stormwater basins, wastewater effluent ponds, and recharge basins. Deep percolation of agricultural and landscape irrigation also makes significant contributions to groundwater recharge. The amount of groundwater recharge varies annually and is highly dependent on precipitation, especially in watersheds to the Kings River.[27] In 2020, recharge was 5,316 acre-feet (AF), while the City's 30-year average groundwater recharge quantity is approximately 8,412 acre-feet per year (AFY). In the past 30 years the groundwater table has dropped 48 feet, from a depth of 92 feet in 1991 to a depth of 140 feet in

[24] City of Clovis. 2021. Urban Water Management Plan. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 15, 2025.

[25] City of Clovis. 2021. Urban Water Management Plan. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 15, 2025.

[26] North Kings Groundwater Sustainability Agency (NKGSA). 2025. Groundwater Sustainability Plan 2025 Update. Website: https://provostandpritchard-my.sharepoint.com/personal/rquist_ppeng_com/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP%2FNKGSA%20GSP%202025%20Update%20Secure%2Epdf&parent=%2Fpersonal%2Frquist_ppeng_com%2FDocuments%2FWebsite%20Management%2FWebsite%20Assets%2FNorth%20Kings%20GSA%2FGSP&ga=1. Accessed May 15, 2025.

[27] City of Clovis. 2021. Urban Water Management Plan. Website: https://cityofclovis.com/wp-content/uploads/2021/08/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 15, 2025.

2019. The amount of groundwater extracted by the City from the Kings Subbasin has reduced since 2016 and is expected to continue to be reduced with implementation of water conservation measures and increased supplies from non-groundwater sources.

Water Supply Assessment

A more complete analysis of the water demand and supply for the City and the proposed project is provided in Section 3.17, Utilities and Service Systems.

Flooding and Inundation

Flooding events can result in damage to structures, injury or loss of human and animal life, exposure of waterborne diseases, and damage to infrastructure. In addition, standing floodwater can destroy agricultural crops, undermine infrastructure and structural foundations, and contaminate groundwater.

Regionally, the major flood issues are associated with the San Joaquin River, the Kings River, and their tributaries.[28] Three major dams have been constructed to control flows on the rivers, including Friant and Mendota Dams on the San Joaquin River and Pine Flat Dam on the Kings River. In addition, several reservoirs, detention basins and canals have been constructed on streams east of the Fresno-Clovis area to prevent flooding and to convey flows around developed areas.

Flood protection in the City is afforded by Big Dry Creek Dam on Dry Creek, located adjacent to the SOI Expansion Area.[29] The dam's main purpose is flood control, and it has a storage capacity of 30,200 AF. The Big Dry Creek Dam impounds stormwater runoff from Big Dry Creek in the Big Dry Creek Reservoir, which is owned and operated by the FMFCD. The Big Dry Creek Dam provides a 230-year flood level of protection.

FEMA Floodplain Mapping

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the majority of the SOI Expansion Area is located within an area of minimal flood hazard (Zone X areas determined to be outside the 0.2 percent [500-year] annual chance floodplain).[30] Portions of the SOI Expansion Area are located within the 500-year flood zone (Zone X, areas of 0.2 percent annual chance [500-year] flood; areas of 1 percent annual chance [100-year] flood with average depths of less than 1 foot or with drainage areas with less than 1 square mile; and areas protected by levees from the 1 percent annual chance [100-year] flood). The central and western portions of the SOI Expansion Area, largely outside of MP Area 1, are within the 100-year flood zone (special flood hazard areas subject to inundation by the 1 percent annual chance flood). It is noted that a portion of the 100-year flood zone (associated with Big Dry Creek Reservoir Outlet Works

[28] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report. Website: https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-09-Hydrology-and-Water-Quality.pdf. Accessed May 15, 2025.

[29] County of Fresno. 2024. Fresno County Hazard Mitigation Plan, Annex A: City of Clovis. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/county-administrative-office/hazard-mitigation-plan/annex-files/draft-annex-a-city-of-clovis.pdf. Accessed May 15, 2025.

[30] Federal Emergency Management Agency (FEMA). 2025. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/search. Accessed May 15, 2025.

Channel) runs in a southwesterly direction through the center of MP Area 1. Exhibit 3.10-2 shows the 100- and 500-year flood boundaries in relation to the SOI Expansion Area.

Dam Failure

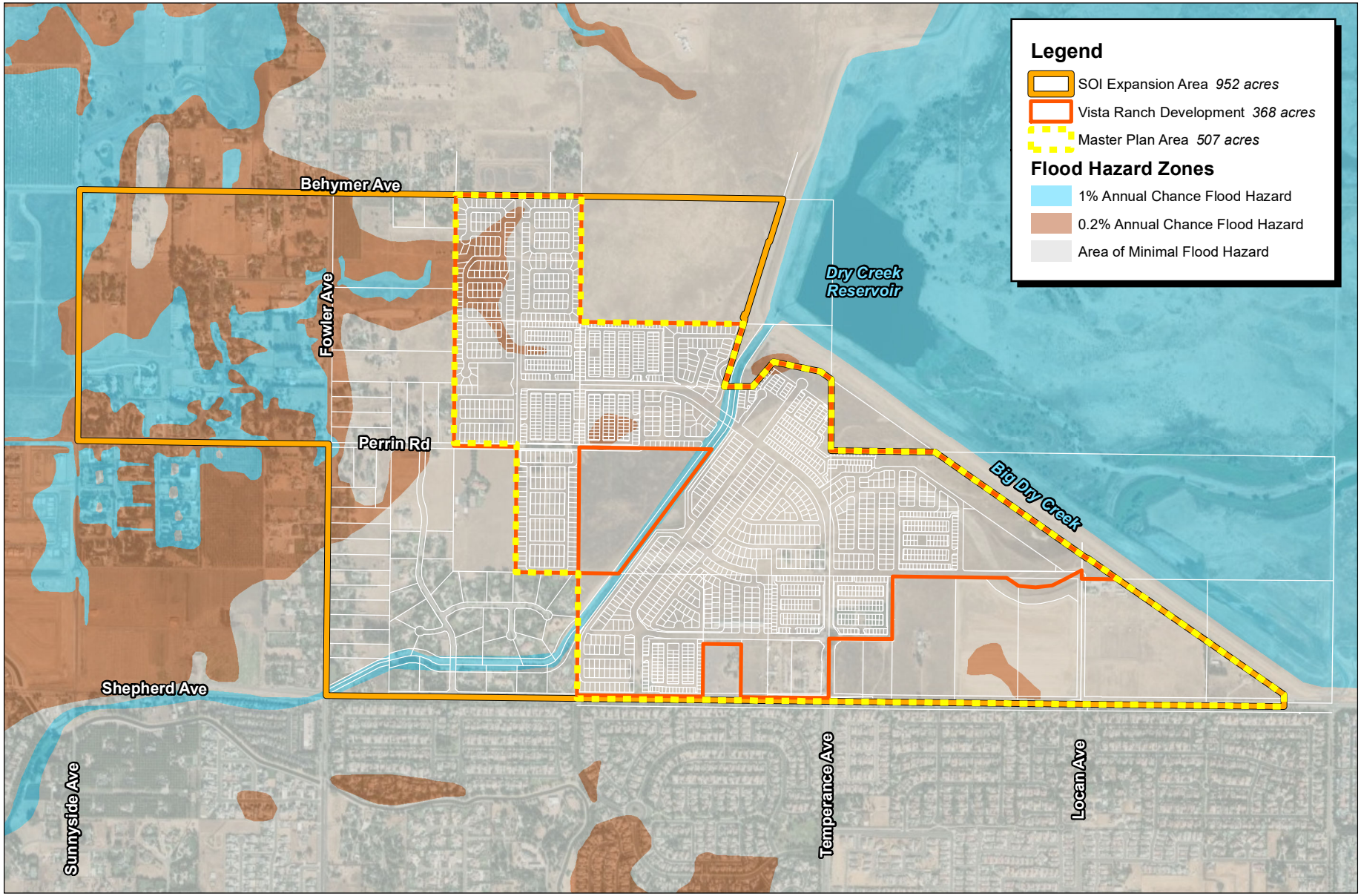
Portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. Dam failure is generally a result of structural instability caused by improper design or construction, instability resulting from seismic shaking, or overtopping and erosion of the dam. Dams that are higher than 25 feet or with storage capacities over 50 AF of water are regulated by the California Dam Safety Act, which is implemented by the DWR, Division of Safety of Dams (DSOD). Because the dam has a storage capacity of 30,200 AF, DSOD is responsible for inspecting and monitoring it. The Act also requires that dam owners submit to the California Office of Emergency Services (OES) inundation maps for dams that would cause significant loss of life or personal injury because of dam failure. The County OES is responsible for developing and implementing a Dam Failure Plan that designates evacuation plans, the direction of floodwaters, and provides emergency information.

Tsunami and Seiche

Seiches are changes or oscillations of water levels within a confined water body. Seiches may be caused by fluctuation in the atmosphere, tidal currents, or earthquakes. Large, inland bodies of water that could generate seiches include retention basins and reservoirs such as the Big Dry Creek Reservoir, located east of the SOI Expansion Area.

A tsunami is a series of waves in a water body caused by the displacement of a large volume of water, generally in an ocean or a large lake due to earthquakes, volcanic eruptions, and other underwater explosions. The SOI Expansion Area is approximately 118 miles from the coastline of the Pacific Ocean.

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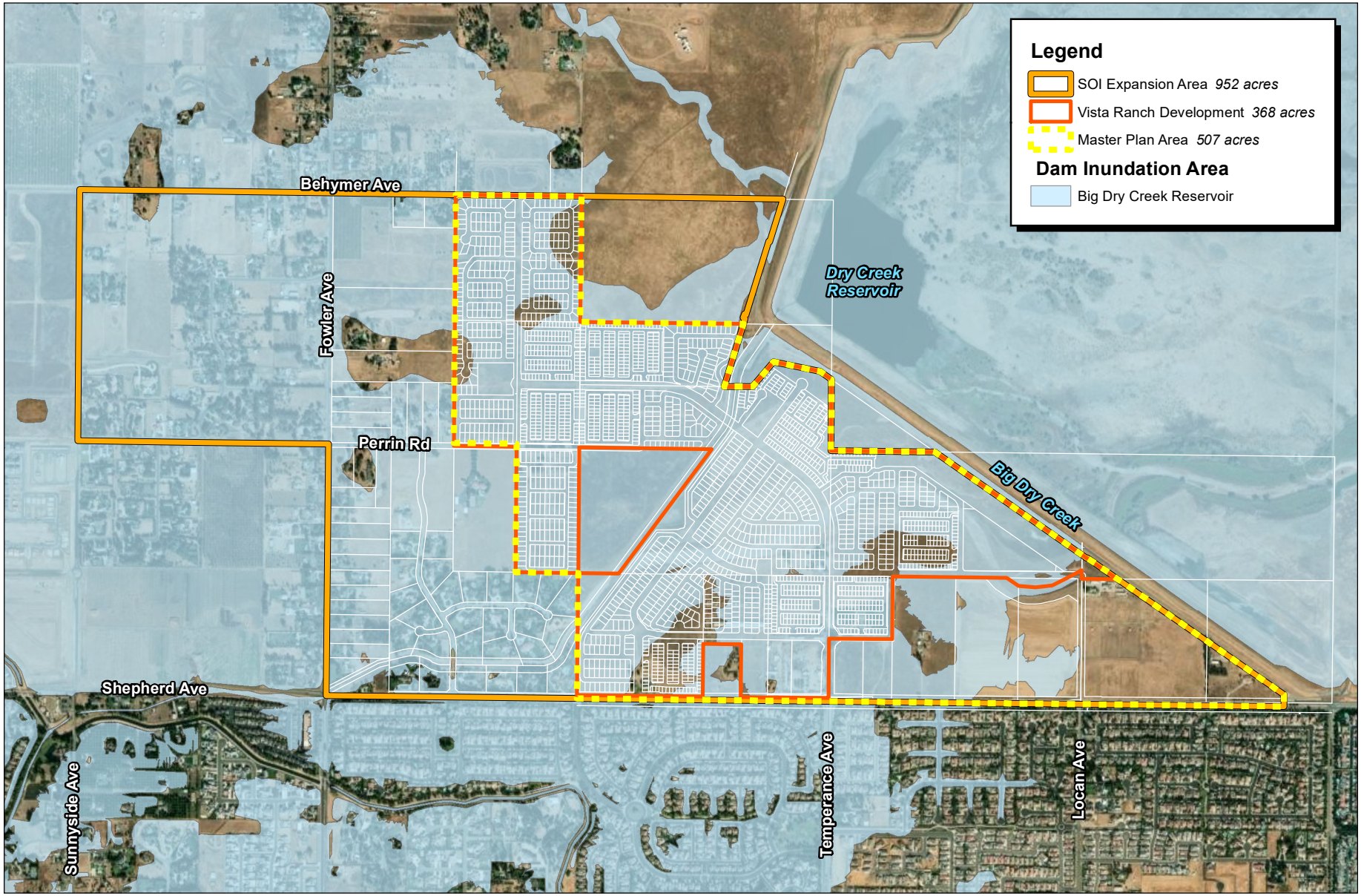


Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. FEMA National Flood Hazard Layer (NFHL).

1,500 750 0 1,500 Feet

Exhibit 3.10-2
FEMA Flood Hazard Map

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Source: ESRI Aerial Imagery. County of Fresno. Harbour & Associates Civil Engineers, 08/21/2025. Fresno Metropolitan Flood Control District.

1,500 750 0 1,500 Feet

Exhibit 3.10-3
Dam Inundation Map

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3.10.3 - Regulatory Framework

Federal

Clean Water Act

The CWA (33 United States Code [USC] § 1251, *et seq*.) is the major federal legislation governing the water quality aspects of construction and operation of the proposed project or variant. The CWA established the basic structure for regulating discharges of pollutants into waters of the United States (not including groundwater) and waters of the State. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the nation's waters." The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States.

The CWA authorizes the United States Environmental Protection Agency (EPA) to implement pollution control programs. Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained. In addition, the CWA requires each state to adopt water quality standards for receiving water bodies and to have those standards approved by the EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality objectives necessary to support those uses.

Responsibility for protecting water quality in California resides with the State Water Board and nine RWQCBs. The State Water Board establishes Statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement water quality control plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. Water quality standards applicable to the proposed project are listed in the Central Valley RWQCB Basin Plan.

Section 303—Water Quality Standards and Total Maximum Daily Loads

Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards.

CWA Section 303(d) requires states and authorized Native American Tribes to develop a list of water quality–impaired segments of waterways. The list includes State waters that do not meet water quality standards necessary to support a waterway's beneficial uses even after the minimum required levels of pollution control technology have been installed. Listed water bodies are to be priority ranked for development of a TMDL. A TMDL is a calculation of the total maximum daily load (amount) of a pollutant that a water body can receive on a daily basis and still safely meet water quality standards. The TMDLs include waste load allocations for urban stormwater runoff as well as municipal and industrial wastewater discharges, with allocations apportioned for individual Municipal Separate

Storm Sewer Systems (MS4s) and wastewater treatment plants. For stormwater, load reductions would be required to meet the TMDL waste load allocations within the 20 years required by the TMDLs.

The State Water Board, RWQCBs, and EPA are responsible for establishing TMDL waste load allocations and incorporating approved TMDLs into water quality control plans, NPDES permits, and waste discharge requirements (WDRs) in accordance with a specified schedule for completion.

Section 401—Water Quality Certification

Section 401 of the CWA requires compliance with State water quality standards for actions within State waters. Under CWA Section 401, an applicant for a Section 404 permit (to discharge dredged or fill material into waters of the United States) must first obtain a certificate from the appropriate agency stating that the fill is consistent with the State's water quality standards and criteria. In California, the State Water Board delegates authority to either grant water quality certification or waive the requirements to the nine RWQCBs. The Central Valley RWQCB is responsible for the SOI Expansion Area.

Section 402—National Pollution Discharge Elimination System Permits

The RWQCBs administer the NPDES stormwater permitting program, under Section 402(d) of the federal CWA, on behalf of EPA. The objective of the NPDES program is to control and reduce levels of pollutants in-water bodies from discharges of municipal and industrial wastewater and stormwater runoff. CWA Section 402(d) establishes a framework for regulating nonpoint-source stormwater discharges (33 USC 1251). Under the CWA, discharges of pollutants to receiving water are prohibited unless the discharge complies with an NPDES permit. The NPDES permit specifies discharge prohibitions, effluent limitations, and other provisions, such as monitoring deemed necessary to protect water quality based on criteria specified in the National Toxics Rule (NTR), the California Toxics Rule (CTR), and the Basin Plan.

Discharge prohibitions and limitations in an NPDES permit for wastewater treatment plants are designed to maintain public health and safety, protect receiving water resources, and safeguard the water's designated beneficial uses. Discharge limitations typically define allowable effluent quantities for flow, biochemical oxygen demand, total suspended matter, residual chlorine, settleable matter, total coliform, oil and grease, pH, and toxic pollutants. Limitations also typically encompass narrative requirements regarding mineralization and toxicity to aquatic life. Under the NPDES permits issued to a city/county to operate the treatment plants, the city/county is required to implement a pretreatment program. This program must comply with the regulations incorporated in the CWA and the General Pretreatment Regulations (Code of Federal Regulations [CFR] Title 40, Part 403 [40 CFR 403]).

Section 404—Water Quality Certification

Section 404 of the CWA regulates temporary and permanent fill and disturbance of wetlands and waters of the United States. Under Section 404, the discharge (temporary or permanent) of dredged or fill material into waters of the United States, including wetlands, typically must be authorized by the USACE through either the Nationwide Permit (general categories of discharges with minimal effects) or the Individual Permit.

River and Harbors Act Section 10

Section 10 of the Rivers and Harbors Act of 1899 requires that regulated activities conducted below the ordinary high water elevation of navigable waters of the United States be approved and permitted by the USACE. Regulated activities include the placement or removal of structures, work involving dredging, disposal of dredged material, filling, excavation, or any other disturbance of soils/sediments or modification of a navigable waterway. Navigable waters of the United States are those waters of the United States that are subject to the ebb and flow of the tide shoreward to the mean high water mark and/or that are presently used, or have been used in the past, or may be susceptible to use to transport interstate or foreign commerce. Section 10 also regulates tributaries and backwater areas that are associated with navigable waters of the United States and are located below the ordinary high water elevation of the adjacent navigable waterway.

A project proponent can apply for a permit/letter of permission for work regulated under Section 404 (CWA) and Section 10 (Rivers and Harbors Act) by completing and submitting one application form. An application for a USACE permit will serve as an application for both Section 404 and Section 10 permits.

Federal Antidegradation Policy

The federal antidegradation policy is designed to protect existing water uses, water quality, and national water resources. The federal policy directs states to adopt a statewide policy that includes the following primary provisions:

- Existing instream uses and the water quality necessary to protect those uses shall be maintained and protected.
- Where existing water quality is better than necessary to support fishing and swimming conditions, that quality shall be maintained and protected unless the state finds that allowing lower water quality is necessary for important local economic or social development.
- Where high-quality waters constitute an outstanding national resource, such as waters of national and State parks, wildlife refuges, and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected.

National Toxics Rule and California Toxics Rule

In 1992, the EPA promulgated the NTR under the CWA to establish numeric criteria for priority toxic pollutants for 14 states to bring all states into compliance with the requirements of CWA Section 303(c)(2)(B). The NTR established water quality standards for 42 pollutants not covered under California's Statewide water quality regulations at that time. As a result of the court-ordered revocation of California's Statewide Basin Plans in September 1994, the EPA initiated efforts to promulgate additional federal water quality standards for California. In May 2000, the EPA issued the CTR, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the NTR.

Executive Order 11988

Executive Order 11988, "Floodplain Management," directs all federal agencies to avoid, to the extent possible, long- and short-term adverse impacts of occupancy and modification of floodplains, and to avoid supporting development in a floodplain either directly or indirectly wherever there is a practicable alternative. Compliance requirements are outlined in 23 CFR 650, Subpart A, "Location and Hydraulic Design of Encroachment on Floodplains."

If a project involves significant encroachment into the floodplain, the final environmental document must include:

- The reasons why the proposed action must be located in the floodplain,
- Alternatives considered and the reasons they were not practicable, and
- A statement indicating whether the action conforms to applicable State or local floodplain protection standards.

Federal Emergency Management Agency

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted to reduce the need for flood protection structures and limit disaster relief costs by restricting development in floodplains. FEMA, established in 1979, is responsible for predicting hazards from flooding events and forecasting the level of inundation under various conditions. As part of its duty to develop standards for delineating fluvial and coastal floodplains, FEMA provides information on FIRMs about the potential for flood hazards and inundation and, where appropriate, designates regions as special flood hazard areas. Special flood hazard areas are defined as areas that have a 1 percent chance of flooding in a given year.

FEMA also administers the National Flood Insurance Program (NFIP), a federal program that enables property owners in participating communities to purchase insurance as protection against flood losses in exchange for State and community floodplain management regulations that reduce future flood damages.

State

California Fish and Wildlife Code

The California Department of Fish and Wildlife (CDFW) protects streams, water bodies, and riparian corridors through the streambed alteration agreement process under Section 1600 to 1616 of the California Fish and Game Code. The California Fish and Game Code establishes that "an entity may not substantially divert or obstruct the natural flow or substantially change the bed, channel or bank of any river, stream or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river stream, or lake" (Fish and Game Code [FGC] Section 1602(a)) without notifying the CDFW, incorporating necessary mitigation, and obtaining a streambed alteration agreement. The CDFWs jurisdiction extends to the top of banks and often includes the outer edge of riparian vegetation canopy cover.

California Code of Regulations

California Code of Regulations (CCR) Title 22, Chapter 15, Article 20 requires all public water systems to prepare a Consumer Confidence Report for distribution to its customers and to the Department of Health Services. The Consumer Confidence Report provides information regarding the quality of potable water provided by the water system. It includes information on the sources of the water, any detected contaminants in the water, the maximum contaminants levels set by regulation, violations and actions taken to correct them, and opportunities for public participation in decisions that may affect the quality of the water provided.

California Government Code

Relevant sections of the California Government Code are identified below.

Section 65302

Revised safety elements must include maps of any 200-year flood plains and levee protection zones within the general plan planning area.

Section 65584.04

Any land having inadequate flood protection, as determined by FEMA or DWR, must be excluded from land identified as suitable for urban development within the planning area.

Section 8589.4

California Government Code Section 8589.4, commonly referred to as the Potential Flooding-Dam Inundation Act, requires owners of dams to prepare maps showing potential inundation areas in the event of dam failure. A dam failure inundation zone is different from a flood hazard zone under the NFIP. NFIP flood zones are areas along streams or coasts where storm flooding is possible from a "100-year flood." In contrast, a dam failure inundation zone is the area downstream from a dam that could be flooded in the event of dam failure caused by an earthquake or other catastrophe. Dam failure inundation maps are reviewed and approved by the OES. Sellers of real estate within inundation zones are required to disclose this information to prospective buyers.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the State must adopt water quality policies, plans, and objectives that protect the State's waters for the use and enjoyment of the people. Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The RWQCBs are required to formulate and adopt Basin Plans for all areas in the region and establish water quality objectives in the plans. The Porter-Cologne Act sets forth the obligations of the State Water Board and RWQCBs to adopt and periodically update Basin Plans. The Central Valley RWQCB is responsible for the SOI Expansion Area.

Basin Plans are the regional water quality control plans required by both the CWA and the Porter-Cologne Act that establish beneficial uses, water quality objectives, and implementation programs for each of the nine regions in California. The Act also requires waste dischargers to notify the RWQCBs

of their activities by filing reports of waste discharge and authorizes the State Water Board and RWQCBs to issue and enforce WDRs, NPDES permits, CWA Section 401 water quality certifications, or other approvals. The RWQCBs are also authorized to issue waivers to reports of waste discharge and WDRs for broad categories of "low threat" discharge activities that have minimal potential to cause adverse water quality effects when implemented according to prescribed terms and conditions.

National Pollutant Discharge Elimination System

The NPDES permits all involve similar processes, which include submitting notices of intent for discharging to water in areas under the Central Valley RWQCB's jurisdiction and implementing Best Management Practices (BMPs) to minimize those discharges. The Central Valley RWQCB may also issue site-specific WDRs, or waivers to WDRs, for certain waste discharges to land or waters of the State.

Construction Activity

The State Water Board stormwater general permit for construction activity (Order 2009-009-DWQ, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ) applies to all construction activities that would disturb 1 acre of land or more. Construction activities subject to the general construction activity permit include clearing, grading, stockpiling, and excavation. Dischargers are required to eliminate or reduce non-stormwater discharges to storm sewer systems and other waters.

Through the NPDES and WDR processes, the State Water Board seeks to ensure that the conditions at a project site during and after construction do not cause or contribute to direct or indirect impacts on water quality (i.e., pollution and/or hydromodification) upstream and downstream. To comply with the requirements of the Construction General Permit, the project applicant must file a notice of intent with the State Water Board to obtain coverage under the permit; prepare a Storm Water Pollution Prevention Plan (SWPPP); and implement inspection, monitoring, and reporting requirements appropriate to the project's risk level as specified in the SWPPP. The SWPPP includes a site map, describes construction activities and potential pollutants, and identifies BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources, such as petroleum products, solvents, paints, and cement. The permit also requires the discharger to consider using post-construction permanent BMPs that will remain in service to protect water quality throughout the life of the project. All NPDES permits also have inspection, monitoring, and reporting requirements.

Project sites served by the combined sewer system are not required to obtain coverage under the NPDES Construction General Permit.

Industrial General Stormwater Permit

The Statewide stormwater NPDES permit for general industrial activity (Order 2014-0057-DWQ, superseding Order 97-03-DWQ) regulates discharges associated with 10 broad categories of industrial activities, such as operation of wastewater treatment works, and with recycling facilities. The industrial general permit requires the implementation of Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology to achieve performance standards. The permit also requires development of a SWPPP that identifies the site-specific sources of

pollutants and describes the measures at the facility applied to reduce stormwater pollution. A monitoring plan is also required.

Stormwater

In November 1990, the EPA published regulations establishing NPDES permit requirements for municipal and industrial stormwater discharges. Phase I of the permitting program applied to municipal discharges of stormwater in urban areas where the population exceeded 100,000 persons. Phase II of the NPDES stormwater permit regulations, which became effective in March 2003, required that NPDES permits be issued for construction activity for projects disturbing 1–5 acres. Phase II of the municipal permit system (known as the NPDES General Permit for Small MS4s, Order No. 2003-0005-DWQ as amended by 2013-0001-DWQ) required small municipalities of fewer than 100,000 persons to develop stormwater management programs. This permit authorizes discharges of stormwater and some categories of non-stormwater that are not "significant contributors of pollutants."

California Toxics Rule and State Implementation Policy

The CTR, presented in 2000 in response to requirements of EPA's NTR, establishes numeric water quality criteria for approximately 130 priority pollutant trace metals and organic compounds. The CTR criteria are regulatory criteria adopted for inland surface waters, enclosed bays, and estuaries in California that are on the CWA Section 303(c) list for contaminants. The CTR includes criteria for the protection of aquatic life and human health. Human health criteria (water- and organism-based) apply to all waters with a municipal and domestic water supply beneficial use designation as indicated in the Basin Plans. The Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, also known as the State Implementation Policy, was adopted by the State Water Board in 2000. It establishes provisions for translating CTR criteria, NTR criteria, and Basin Plan water quality objectives for toxic pollutants into:

- NPDES permit effluent limits,
- Effluent compliance determinations,
- Monitoring for 2,3,7,8-tcdd (dioxin) and its toxic equivalents,
- Chronic (long-term) toxicity control provisions,
- Site-specific water quality objectives, and
- Granting of effluent compliance exceptions.

The goal of the State Implementation Plan is to establish a standardized approach for permitting discharges of toxic effluent to inland surface waters, enclosed bays, and estuaries throughout the State.

Water Quality Control Plan

The Water Quality Control Plan for the Sacramento River and San Joaquin River Basin and Tulare Lake Basin (Basin Plans) include a summary of beneficial water uses, water quality objectives needed to protect the identified beneficial uses, and implementation measures. The Basin Plans establish water quality standards for all the ground and surface waters of the region. The term "water

quality standards," as used in the federal CWA, includes both the beneficial uses of specific water bodies and the levels of quality that must be met and maintained to protect those uses. The Basin Plans include an implementation plan describing the actions by the RWQCB and others that are necessary to achieve and maintain the water quality standards.

The RWQCB regulates waste discharges to minimize and control their effects on the quality of the region's ground and surface water. Permits are issued under several programs and authorities. The terms and conditions of these discharge permits are enforced through a variety of technical, administrative, and legal means. Water quality problems in the region are listed in the Basin Plan, along with the causes, where known. For water bodies with quality below the levels necessary to allow all the beneficial uses of the water to be met, plans for improving water quality are included. The Basin Plans reflect, incorporate, and implement applicable portions of several national and Statewide water quality plans and policies, including the California Water Code (CWC) and the CWA.

State Water Resources Control Board Storm Water Strategy

The Storm Water Strategy is founded on the results of the Storm Water Strategic Initiative, which served to direct the State Water Board's role in stormwater resources management and evolve the Storm Water Program by: developing guiding principles to serve as the foundation of the stormwater program; identifying issues that support or inhibit the program from aligning with the guiding principles; and proposing and prioritizing projects that the Water Boards could implement to address those issues.

The State Water Board staff created a strategy-based document called the Strategy to Optimize Management of Storm Water (STORMS). STORMS includes a program vision, missions, goals, objectives, projects, timelines, and consideration of the most effective integration of project outcomes into the State Water Board's Storm Water Program.

Local

North Kings Groundwater Sustainability Plan

The North Kings GSP was developed pursuant to the SGMA Emergency Regulations under California Water Code Section 10733.2. The GSP was submitted by the NKGSA—a Joint Powers Authority including the City of Clovis—to the DWR in January 2025 following Board approval and a public comment period in Fall 2024.

The GSP includes specific management actions and projects to achieve groundwater sustainability in the North Kings Subbasin by 2040. These actions include a Domestic Well Mitigation Program to assist households impacted by declining groundwater levels, a Confined Aquifer Study to address subsidence and data gaps, and an Interconnected Surface Water Analysis to evaluate surface water-groundwater interactions. The North Kings GSP also establishes a schedule for 5-year evaluations to report groundwater conditions, implementation progress, and adaptive measures to DWR.

The North Kings GSP "management actions" refer to activities intended to minimize, reduce, or eliminate undesirable results such as chronic lowering of groundwater levels, land subsidence, and

degraded water quality. The benefits of these actions are assessed through performance standards that include implementation schedules and milestones.

Fresno-Clovis Storm Water Quality Management Program

The Fresno-Clovis Storm Water Quality Management Program (SWQMP) was developed pursuant to Order No. R5-2013-0080 (issued by the Central Valley RWQCB in 2013).[31] The Municipal NPDES Stormwater Permit (MS4 Permit) was issued to the FMFCD, the Cities of Fresno and Clovis, the County of Fresno, and the California State University at Fresno by the Central Valley RWQCB on May 31, 2013. The SWQMP includes specific pollution prevention and control practices for Fresno-Clovis urban drainage system planning, design, construction, and maintenance. It also includes public education to prevent stormwater pollution and specifies construction, industrial/commercial, municipal, and new development stormwater quality control practices; procedures to prevent and respond to illicit discharges and connections; monitoring to assess municipal stormwater impacts on receiving waters; and program effectiveness assessments to evaluate the effectiveness of BMPs.

The SWQMP "control measures" refer to activities intended to minimize, reduce, eliminate, or prohibit the discharge of pollutants with the goal of improving water quality. The benefits of these control measures are assessed through evaluation of associated performance standards. The performance standards include schedules and milestones for implementation.

City of Clovis General Plan

The General Plan includes several policies that are relevant to hydrology and water quality. The General Plan goals and policies applicable to the proposed project are identified below:[32]

Land Use Element

Policy 4.2 Surface water entitlements. The City should not approve annexation unless any and all surface water entitlements are retained; any and all surface water entitlements shall be transferred to the City upon development.

Public Facilities and Services Element

Policy 1.2 Water supply. Require that new development demonstrate contractual and actual sustainable water supplies adequate for the new development's demands.

Policy 1.3 Annexation. Prior to annexation, the City must find that adequate water supply and service and wastewater treatment and disposal capacity can be provided for the proposed annexation. Existing water supplies must remain with the land and be transferred to the City upon annexation approval.

[31] Fresno Metropolitan Flood Control District (FMFCD). 2013. Fresno-Clovis Storm Water Quality Management Program. Website: https://www.fresnofloodcontrol.org/wp-content/uploads/2022/09/Stormwater-Quality-Management-Plan.pdf. Accessed May 15, 2025.

[32] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Policy 1.5 Recycled water. Use recycled water to reduce the demands for new water supplies. Support the expansion of recycled water infrastructure throughout Clovis and require new development to install recycled water infrastructure where feasible.

Policy 1.7 Groundwater. Stabilize groundwater levels by requiring that new development water demands not exceed the sustainable groundwater supply.

Environmental Safety Element

Goal 1 Minimized risk of injury, loss of life, property damage, and economic and social disruption caused by natural hazards.

Policy 1.1 Flood Zone. Prohibit development within the 100-year flood zone and dam inundation areas unless adequate mitigation is provided against flood hazards. Participate in the National Flood Insurance Program.

Open Space and Conservation Element

Goal 3 A built environment that conserves and protects the use and quality of water and energy resources.

Policy 3.1 Stormwater management. Encourage the use of low impact development techniques that retain or mimic natural features for stormwater management.

Policy 3.2 Stormwater pollution. Minimize the use of non-point source pollutants and stormwater runoff.

Policy 3.4 Drought-tolerant landscaping. Promote water conservation through the use of drought-tolerant landscaping on existing and new residential properties. Require drought-tolerant landscaping for all new commercial and industrial development and City maintained landscaping, unless used for recreation purposes.

City of Clovis Municipal Code

The CMC Chapter 6.7 establishes the City's Urban Storm Water Quality Management and Discharge Control Ordinance. The purpose of the ordinance is to protect and enhance the water quality of watercourses and water bodies by reducing pollutants in urban stormwater discharges to the maximum extent practicable and by effectively prohibiting non-stormwater discharges to the storm drain system. The ordinance prohibits any discharge that could result in or contribute to a violation of the municipal NPDES stormwater discharge permit. It requires BMPs to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects.

Chapter 8.7 requires payment of local drainage fees to fund construction of local drainage facilities and improvements.

Chapter 8.12 provides for floodplain management and regulates development in floodplains. A development permit must be obtained before construction or development within any area of special

flood hazard. Permits require provisions for flood hazard reduction, including anchoring, flood-resistant materials, and construction methods to floodproof the structure.

Chapter 9.28 contains landscaping standards and requires a landscape design plan, irrigation design plan, and soil analysis to reduce runoff and control soil erosion as part of the landscape documentation package.

Chapter 9.110 provides subdivision design and improvement requirements. According to Section 9.110.040, a grading plan is required to be submitted to and approved by the City Engineer prior to issuance of a subdivision-level building permit. Subdivisions are required to incorporate appropriate erosion and sediment control measures.

3.10.4 - Methodology

This section is based on the information provided by a number of sources, which are described below.

Provost & Pritchard Consulting Group prepared a WSA that evaluated water impacts, generally consistent with the requirements for a WSA per CWC Section 10910. The WSA is provided in Appendix I.1. This WSA evaluates the adequacy of available water supplies for the proposed Vista Ranch Development and surrounding areas, including the SOI Expansion Area north of Shepherd Avenue and west of Sunnyside Avenue, located in Fresno County. The proposed project would entail the development of approximately 3,286 single-family residential lots, more than the “500 residential units” trigger under the California Government Code ; therefore, a WSA is required. The City operates the water system to which the proposed project proposes to connect. This water system meets the standards for a “Public Water System” as set forth in CWC Section 10912(c); the City is therefore responsible for preparation of the required WSA in accordance with CWC Section 10910(b). This WSA discusses the estimated water demands and water supply for the proposed project.

FirstCarbon Solutions (FCS) also reviewed relevant City documents, including the General Plan and the CMC. Furthermore, FCS reviewed relevant documents from the City, including the Fresno-Clovis SWQMP and the 2020 Clovis UWMP.

Cumulative Analysis

The geographic scope of the cumulative hydrology and water quality analysis is the Tulare Lake Hydrological Region. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect hydrology and water quality. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project’s cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.10.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether hydrology and water quality impacts resulting from the implementation of the proposed project would be considered significant. Impacts would be significant if the proposed project would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
   (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.

3.10.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Surface and Groundwater Quality

Impact HYD-1:	**The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not

receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Approval of the SOI Expansion would not result in physical development and, as such, would not violate any water quality standards or water discharge requirements or otherwise substantially degrade surface or ground water quality. Therefore, no impacts would occur.

MP Area 2

Construction

Construction associated with the proposed project would include grading, excavation, and removal of vegetative cover that has the potential to result in runoff that contains sediment and other pollutants that could degrade surface and groundwater quality, if not properly controlled. Sources of potential pollution associated with construction include fuel, grease, oil and other fluids, concrete material, sediment, and litter. These pollutants have the potential to result in impacts caused by chemical contamination from construction activities and materials that could pose a hazard to the environment or degrade water quality if not properly managed and controlled.

New projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters, and specify BMPs that would be used by that project to minimize pollution of stormwater. Such BMPs may include, but are not limited to, temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards in Chapter 9.28 designed to reduce runoff and control soil erosion.

Implementation of a SWPPP and associated BMPs, and applicable local regulations, would reduce potential impacts related to violating water quality standards or waste discharge requirements. Therefore, the impact would be less than significant.

Operation

The long-term operations of the proposed Master Plan could result in long-term impacts to surface water quality from urban stormwater runoff. The proposed Master Plan would result in new impervious surfaces and would introduce urban uses within MP Area 2. Normal activities in these developed areas include the use of various automotive petroleum products and household hazardous materials, including cleansers, paints, fertilizers, and pesticides. Within urban areas, these pollutants are generally called non-point source pollutants. While non-point source pollutants from the Master Plan Area already exist, primarily because of road and agricultural runoff, the proposed Master Plan could increase potential pollutants relative to existing conditions. The pollutant levels would vary based on

factors such as time between storm events, volume of storm events, type of land uses, and density of people.

The SOI Expansion Area is located within the service area of the FMFCD. FMFCD's stormwater drainage system consists of interconnected surface conveyances, storm drains, detention basins (stormwater basins), pump stations, and outfalls. Stormwater runoff in the City is conveyed through a system of street gutters, underground storm drains, retention/detention basins, pumping stations, and open channels that are maintained by the FMFCD. FMFCD's stormwater drainage system discharges to irrigation canals, creeks, and the San Joaquin River. The system is designed to accept the peak flow rate of runoff from a 2-year intensity storm event (a storm that has a 50 percent probability of occurring in any given year). When storm events occur that exceed the 2-year intensity, ponding begins to occur in the streets until the pipeline system can remove the water. If the storm is of sufficient intensity to generate more water than the street can store, the water will continue to rise until it reaches a topographic outlet where it can escape downgradient.

The proposed Master Plan would include construction of a new storm drainage system to serve the Master Plan Area, which would conform to applicable regulations, standards, and specifications of the State Water Board, FMFCD, and City. This includes, but is not limited to, the municipal NPDES stormwater permit and the City's Urban Storm Water Quality Management and Discharge Control Ordinance, which would require the implementation of BMPs to control the volume, rate, and potential pollutant load of stormwater runoff. Stormwater would be collected in FMFCD's basins that serve the City. Compliance with existing standards and rules, including the implementation of BMPs, would ensure that the proposed Master Plan would have a less than significant impact relative to this topic.

Vista Ranch Development/MP Area 1

Construction

Development associated with the proposed Vista Ranch Development would involve grading, excavation, removal of vegetation cover, and activities associated with construction activities that could temporarily increase runoff, erosion, and sedimentation. Construction activities could also result in soil compaction and wind erosion impacts that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas.

Each phase of construction disturbing 1 acre or more of soil would be required to obtain coverage under the Construction General Permit. The permit requires development and implementation of a SWPPP and monitoring plan, which must include erosion control and sediment control BMPs that would meet or exceed measures required by the Construction General Permit to control stormwater quality degradation caused by potential construction-related pollutants. The BMPs and overall SWPPP would be reviewed by the RWQCB as part of the permitting process. The SWPPP, once approved, is kept on-site, is implemented during construction activities, and must be made available upon request to representatives of the RWQCB and/or the Lead Agency. Further, project construction would be required to implement construction site control BMPs in compliance with the MS4 Permit. Such BMPs may include, but are not limited to, temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover.

All construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance, as well as all other relevant provisions of the CMC. Appropriate erosion and sediment control measures, as specified in CMC Section 9.110.040, would be implemented, and landscaping standards established by the City in Chapter 9.28 would be followed to minimize runoff and effectively manage soil erosion. Therefore, the proposed Vista Ranch Development would not violate any water quality standards or waste discharge requirements, nor would it otherwise substantially degrade surface water or groundwater quality. Implementation of BMPs during construction activities and compliance with the existing regulatory requirements would reduce potential impacts in this regard to a level that is less than significant.

Operation

The long-term operations of the proposed Vista Ranch Development could result in long-term impacts to surface water quality from urban stormwater runoff. The proposed Vista Ranch Development would result in new impervious surfaces and would introduce urban uses within MP Area 1. Normal activities in these developed areas include the use of various automotive petroleum products and household hazardous materials, including cleansers, paints, fertilizers, and pesticides (non-point source pollutants). While non-point source pollutants from MP Area 1 already exist, primarily due to road and agricultural runoff, the proposed Vista Ranch Development could increase potential pollutants relative to existing conditions. The pollutant levels would vary based on factors such as time between storm events, volume of storm events, type of land uses, and density of people.

The proposed Vista Ranch Development would include construction of a new storm drainage system to serve MP Area 1, which would conform to applicable regulations, standards, and specifications of the State Water Board, FMFCD, and City. This includes, but is not limited to, the municipal NPDES stormwater permit and the City's Urban Storm Water Quality Management and Discharge Control Ordinance. Stormwater would be collected in FMFCD's basins that serve the City. Compliance with existing standards and rules, including the implementation of BMPs, would ensure that the proposed Vista Ranch Development would have a less than significant impact relative to this topic.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Potential cumulative issues associated with surface waters can be addressed on a watershed basis or, in the case of groundwater, in the context of a groundwater basin. Because water resources are highly interconnected, the cumulative setting is based on Fresno County, in the Tulare Lake Hydrological Region, which covers about 16,800 square miles and includes all of Kings and Tulare counties and most of Fresno and Kern counties. Cumulative development in this region, including the proposed Master Plan, would impact the water quality and hydrological features of the Tulare Lake Hydrologic Region. The City is underlain by the Kings Groundwater Subbasin. The Kings Subbasin is bounded on the north by the San Joaquin River, on the west by the Delta-Mendota and Westside Subbasins, on the south by the Kings River South Fork and the Empire West Side Irrigation District, and on the east by the Sierra Nevada foothills. Any matter that may affect water quality draining from MP Area 2 would eventually end up in the Delta or within the groundwater basin.

The San Joaquin River is specifically listed by the Central Valley RWQCB as an impaired water body due to mercury under the CWA. Mercury is a sediment-based pollutant that can be released into the water column during various in-water construction activities (e.g., construction of the storm drain outfall) that may disturb the sediment and cause turbidity. As a result, such activities may increase the likelihood of mercury exposure to the public and wildlife that utilize the San Joaquin River.

However, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by the proposed project to minimize pollution of stormwater. Such BMPs may include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards in Chapter 9.28 designed to reduce runoff and control soil erosion.

The ongoing operational phase of the proposed Master Plan (all phases) would result in the discharge of stormwater, which would ultimately flow into the FMFCD system. Similarly, operations for individual projects within the Master Plan would be required to implement BMPs. The standards and regulations contained above would ensure that BMPs are implemented to reduce the amount of pollution in stormwater discharged from the Master Plan Area into the FMFCD system. Stormwater drainage is managed through the implementation of BMPs to the extent they are technologically achievable to prevent and reduce pollutants. The City requires reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses. The management of water quality through BMPs is intended to ensure that water quality does not degrade to levels that would violate water quality standards.

The implementation of a SWPPP and BMPs are intended to treat runoff close to the source during the construction and long-term operational phase of the Master Plan to reduce stormwater quality impacts. The required erosion control measures are existing regulatory requirements. The impacts would be less than significant relative to this topic. As such, impacts related to water quality would result in a less than cumulatively considerable contribution, and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

Potential cumulative issues associated with surface waters can be addressed on a watershed basis or, in the case of groundwater, in the context of a groundwater basin. Because water resources are highly interconnected, the cumulative setting is based on Fresno County, in the Tulare Lake Hydrological Region, which covers approximately 16,800 square miles and includes all of Kings and Tulare counties and most of Fresno and Kern counties. Cumulative development in this region, including the proposed Master Plan, would impact the water quality and hydrological features of the Tulare Lake Hydrologic Region. The City is underlain by the Kings Groundwater Subbasin. The Kings Subbasin is bounded on the north by the San Joaquin River, on the west by the Delta-Mendota and Westside Subbasins, on the south by the Kings River South Fork and the Empire West Side Irrigation District, and on the east by the Sierra Nevada foothills. Any matter that may affect water quality draining from MP Area 1 would eventually end up in the Delta or within the groundwater basin.

Cumulative development in the watershed contributes to an incremental increase in impervious surfaces that could introduce pollutants that are typically associated with urban runoff into the stormwater system and/or contribute to cumulative flood conditions in the watershed. Cumulative development could also contribute to water quality impacts in the watershed from construction activities. Cumulative impacts would be less than significant because future cumulative development, infrastructure, and planning projects would be subject to local, State, and federal permit requirements and would be required to comply with applicable ordinances and policies, as well as other water quality regulations that control construction-related and operational discharge of pollutants in stormwater. The water quality regulations implemented by the RWQCB take a basin-wide approach and consider water quality impairment in a regional context that addresses the entire geographic context of the watershed. For example, the Construction General Permit ties receiving water limitations and Basin Plan objectives to terms and conditions of the permit, and the MS4 Permit works with all municipalities within the County to manage stormwater systems to be collectively protective of water quality. Because a CWA 404 Permit is required (as outlined in Section 3.4, Biological Resources), the USACE would have approval authority. For these reasons and because of the nature and types of surrounding development, existing stormwater infrastructure, and regulatory requirements, cumulative impacts related to water pollutants or flooding would be less than significant.

In accordance with the NPDES Stormwater Program, the proposed Vista Ranch Development requires an approved SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, and runoff during construction activities. The BMPs and overall SWPPP are reviewed by the RWQCB as part of the permitting process. The SWPPP, once approved, is kept on-site, implemented during

construction activities, and must be made available to representatives of the RWQCB and/or the Lead Agency upon request.

The ongoing operational phase of the proposed Vista Ranch Development would require discharge of stormwater into the on-site detention basins, which would ultimately flow into the FMFCD system. The discharge of stormwater would be treated through BMPs prior to its discharge. Applicable standards and regulations would ensure that BMPs are implemented to reduce the amount of pollution in stormwater discharged from MP Area 1 into the FMFCD system. Stormwater drainage is managed through the implementation of BMPs to the extent they are technologically achievable to prevent and reduce pollutants. The City requires reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses. The management of water quality through BMPs is intended to ensure that water quality does not degrade to levels that would violate water quality standards.

The use of BMPs is intended to treat runoff close to the source during the construction and long-term operational phase of the Vista Ranch Development to reduce stormwater quality impacts. The required erosion control measures are existing regulatory requirements. Development of the proposed Vista Ranch Development would have a less than significant impact relative to this topic. As such, impacts related to water quality would result in a less than cumulatively considerable contribution, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Groundwater Supply/Recharge

Impact HYD-2:	**The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.**

Impact Analysis

Groundwater Supplies

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in the use of groundwater supplies. As such, no impact would occur.

MP Area 2

The Master Plan Area would be annexed into the City and would be served by new connections to the City's water distribution system. According to the UWMP, the City relies on groundwater extracted from the Kings Subbasin, surface water, and recycled water to meet its water demands.[33] As indicated in Section 3.17, Utilities and Service Systems, and based on the technical analyses described in the supporting WSA included in Appendix I.1, the City is projected to have adequate water supply to meet the needs of the City, including the Master Plan Area, during normal and multiple dry water years during a 20-year projection, in addition to existing and planned future uses. As such, the Master Plan Area would receive water supply from the City's water distribution system, which relies on both groundwater and surface water. No new wells would be installed near the Master Plan Area, and no new wells are expected to be needed elsewhere in the City to help meet project demands. The City's UWMP shows that projected supplies after 2025 will not be met with increased groundwater pumping but will instead be met with increased surface water use and recycled water. In addition, the Master Plan Area is entirely within the water system's Pressure Zone 2, which largely relies on surface water supplies. The closest City wells to the Master Plan Area include Well W-33, approximately 0.9 mile south, and Well W-30, approximately 1.25 miles southwest, both of which are already operational. These wells have low production yields compared to other City wells, which have average capacities of 1,035 gallons per minute (gpm). With their distance of approximately 1 mile from the Master Plan Area, they are not expected to have any significant impacts on groundwater levels near the Master Plan Area. Therefore, the City can serve the proposed Master Plan in addition to existing and planned developments with the existing and planned future water supplies.

To evaluate potential impacts to groundwater levels in nearby private wells, Provost and Pritchard prepared the Groundwater Levels Memorandum provided in Appendix I.2, which specifically analyzed conditions adjacent to the Master Plan Area, including properties west of the Master Plan Area. The analysis considered changes in groundwater recharge and extraction resulting from development of the proposed Master Plan, including increases in impervious surfaces, elimination of existing on-site groundwater pumping, and the introduction of new recharge sources.

Construction of impervious surfaces within the Master Plan Area would reduce recharge from precipitation by limiting deep percolation; however, this reduction is relatively minor because precipitation recharge is not a major source of groundwater replenishment in the project area due to low rainfall and limited soil saturation. The Groundwater Levels Memorandum estimates that precipitation recharge would decrease by approximately 66 acre-feet per year (AFY) across the developed portion of the Master Plan Area.

This reduction in recharge would be offset by several project-related factors. First, existing on-site groundwater pumping associated with rural residential uses would be eliminated, reducing groundwater extraction by approximately 10 AFY. Second, recharge would occur through leakage within the City's pressurized water distribution system, contributing an estimated 9 AFY to

[33] City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. July. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed October 1, 2025.

groundwater replenishment. Third, and most substantially, deep percolation of applied irrigation water associated with landscape irrigation and urban uses would contribute approximately 117 AFY to groundwater recharge.

In addition, stormwater runoff from impervious surfaces would be conveyed to off-site stormwater basins, where a portion would infiltrate and contribute to regional groundwater supplies, further offsetting localized reductions in on-site recharge. The proposed Master Plan would also rely on the City's water supply system, which is expected to meet future demand through increased use of surface water and recycled water rather than increased groundwater pumping, and no new wells would be constructed to serve the proposed Master Plan.

Based on these factors, the Groundwater Levels Memorandum concludes that total groundwater replenishment within the project area would increase by approximately 70 AFY, accounting for reductions in precipitation recharge offset by increased recharge and reduced pumping. As a result, groundwater levels in the vicinity of the Master Plan Area, including nearby private wells, are not expected to be adversely affected, and no significant impacts to local domestic wells would occur.

Additionally, the proposed Master Plan would not interfere with the projects or management actions outlined in the North Kings GSP, including proposed system upgrades such as water meter installation and groundwater recharge areas. As discussed above, the City would have adequate water supplies available to support the proposed Master Plan. Additionally, the proposed Master Plan would not include new groundwater extraction operations. As such, the proposed Master Plan would be in compliance with Management Action GP-2 of the North Kings GSP, which requires new developments to prove sustainable water supplies. Therefore, City's water system planning and development and water supply management are consistent with recommendations and actions discussed in the North Kings GSP that will allow the City and other NKGSA members to reach sustainability by 2040, as required under the SGMA. Since the Master Plan Area would be served by the City's water system, development within the Master Plan Area would be constructed to be consistent with the North Kings GSP and SGMA requirements.

Thus, the proposed Master Plan would not substantially decrease groundwater supplies that would impede sustainable groundwater management of the basin; refer to Section 3.17, Utilities and Service Systems, regarding water supplies. As such, implementation of the proposed Master Plan would result in a less than significant impact relative to groundwater supplies.

Vista Ranch Development/MP Area 1

The Vista Ranch Development would be within the Master Plan Area. As described above under MP Area 2, the City is projected to have adequate water supply to meet the needs of the City, including the Master Plan Area, during normal and multiple dry water years during a 20-year projection, in addition to existing and planned future uses. The Groundwater Levels Memorandum also evaluated potential impacts to nearby private wells and concluded that the proposed project would not adversely affect local domestic wells. Specifically, although development of the Master Plan Area would reduce precipitation-based recharge by approximately 66 AFY, this reduction would be offset by elimination of existing on-site groundwater pumping (approximately 10 AFY reduction in extraction), leakage from

the City's pressurized water distribution system (approximately 9 AFY of recharge), and deep percolation of applied landscape irrigation (approximately 117 AFY of recharge), resulting in a net increase of approximately 70 AFY in groundwater replenishment. Because the Vista Ranch Development would not require construction of new groundwater wells and would be served by the City's water supply system, which is expected to rely increasingly on surface water and recycled water rather than increased groundwater pumping, groundwater levels in the vicinity of MP Area 1, including nearby private wells, are not expected to be adversely affected. Thus, the proposed Vista Ranch Development would not substantially decrease groundwater supplies that would impede sustainable groundwater management of the basin; refer to Section 3.17, Utilities and Service Systems, regarding water supplies. As such, implementation of the proposed Vista Ranch Development would result in a less than significant impact relative to groundwater supplies.

Groundwater Recharge

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in inhibition of groundwater recharge. As such, no impact would occur.

MP Area 2

As discussed above, existing recharge to the Kings Subbasin within the NKGSA area occurs both naturally from seepage from the San Joaquin River, Kings River, and intermittent streams and from constructed recharge basins, including seepage in unlined canals, reservoirs, stormwater basins, wastewater effluent ponds, and recharge basins. While natural recharge from percolation of precipitation is considered minor, deep percolation of agricultural and landscape irrigation also makes significant contributions to groundwater recharge. The portion of Big Dry Creek Reservoir Outlet Works Channel that runs through the Master Plan Area is considered a surface water feature significant to management of the NKGSA and contributes to recharge of the Kings Groundwater Subbasin.[34]

Infiltration potential is influenced by several factors, including soil characteristics. In general, sandy soils have higher infiltration rates and can contribute to significant amounts of groundwater recharge; clay soils tend to have lower percolation potential; and impervious surfaces such as pavement, significantly reduce infiltration capacity and increase surface water runoff. The soils contained in the Master Plan Area have a hydrologic rating ranging from "A," which is indicative of soils having a high infiltration rate (low runoff potential) when thoroughly wet, to "D," which is indicative of soils having a very slow infiltration rate (high runoff potential) when thoroughly wet.[35] Additionally, as indicated in the 2024 Geotechnical Investigation, very dense, weakly cemented silty sand, sandy silt, clayey sand, and silty sand/clayey sand, locally referred to as "hardpan," were encountered in several of the

[34] North Kings Groundwater Sustainability Agency (NKGSA). 2025. North Kings Groundwater Sustainability Plan 2025 Update. January 16. Website: https://northkingsgsa.org/groundwater-sustainability-plan/. Accessed October 1, 2025.

[35] United States Department of Agriculture (USDA), Natural Resource Conservation Service (NRCS). 2025. Web Soil Survey. Website: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx. Accessed October 1, 2025.

borings in the Master Plan Area.[36] This cementation inhibits the free percolation of surface water into the soil stratum below the hardpan. Therefore, it can be presumed that portions of MP Area 2 do not allow for a high level of groundwater recharge in the existing condition.

The proposed Master Plan would result in new impervious surfaces within the Master Plan Area, which could reduce on-site rainwater infiltration and groundwater recharge compared to existing conditions. As described above under Groundwater Supplies, the Groundwater Levels Memorandum evaluated this change in recharge and determined that precipitation is not considered a major source of groundwater replenishment in the project area due to low precipitation and limited soil saturation. The memorandum estimates that development of the Master Plan Area would reduce precipitation-based recharge by approximately 66 AFY. However, this reduction would be offset by several project-related factors. Existing on-site groundwater pumping associated with rural residential uses would cease with implementation of the proposed Master Plan, reducing local groundwater extraction by approximately 10 AFY. In addition, leakage from the City's pressurized water distribution system would contribute approximately 9 AFY of recharge, and deep percolation of applied landscape irrigation would contribute approximately 117 AFY of recharge. The proposed Master Plan would also include landscaped areas and 59 acres of parks, trails, and preserved open space, which would remain largely pervious, including the portion of Big Dry Creek Reservoir Outlet Works Channel that runs through the Master Plan Area. Further, areas developed with impervious surfaces would route stormwater into the proposed Master Plan's storm drainage system and to FMFCD facilities designed to retain and infiltrate groundwater, eventually discharging to irrigation canals, creeks, and the San Joaquin River. Accounting for the reduction in precipitation recharge and the offsetting recharge and reduced pumping described above, the proposed Master Plan would result in a net increase of approximately 70 AFY in groundwater replenishment. Therefore, local domestic wells surrounding the Master Plan Area are not expected to be impacted, and while the proposed Master Plan would increase the amount of impervious surfaces within the Master Plan Area compared to existing conditions, the proposed development would not interfere substantially with groundwater recharge. As such, implementation of the proposed Master Plan would result in a less than significant impact relative to groundwater recharge

Vista Ranch Development/MP Area 1

The Vista Ranch Development would result in new impervious surfaces, which could reduce on-site rainwater infiltration and groundwater recharge compared to existing conditions. However, as described above under MP Area 2, the Groundwater Levels Memorandum determined that precipitation is not considered a major source of groundwater replenishment in the project area and that the estimated reduction in precipitation-based recharge (approximately 66 AFY) would be offset by elimination of existing on-site groundwater pumping (approximately 10 AFY reduction in extraction), leakage from the City's pressurized water distribution system (approximately 9 AFY of recharge), and deep percolation of applied landscape irrigation (approximately 117 AFY of recharge). The Vista Ranch Development would also include multiple parks and trails, totaling approximately 20 acres, which would be dispersed throughout the development and remain largely pervious, including

[36] Krazan & Associates, Inc. 2024. Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California. January 31.

the portion of Big Dry Creek Reservoir Outlet Works Channel that runs through MP Area 1. Additionally, areas developed with impervious surfaces would route stormwater into the proposed Vista Ranch Development's storm drainage system and to FMFCD facilities designed to retain and infiltrate groundwater, eventually discharging to irrigation canals, creeks, and the San Joaquin River. Accounting for the reduction in precipitation recharge and the offsetting recharge and reduced pumping described above, the proposed Master Plan would result in a net increase of approximately 70 AFY in groundwater replenishment. Therefore, local domestic wells would not be expected to be impacted, and while the proposed development would increase the amount of impervious surfaces within MP Area 1 compared to existing conditions, the proposed development would not interfere substantially with groundwater recharge. As such, implementation of the proposed Vista Ranch Development would result in a less than significant impact relative to groundwater recharge

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

In terms of groundwater, the cumulative issues are addressed in the extent of the groundwater basin. The City is underlain by the Kings Groundwater Subbasin. The amount of groundwater extracted by the City from the Kings Subbasin has reduced since 2016 and is expected to continue reducing with implementation of water conservation measures and increased supplies from non-groundwater sources. As such, there is no existing cumulative impact.

As described above, the Master Plan would result in new impervious surfaces within the Master Plan Area, which could reduce rainwater infiltration and, in turn, groundwater recharge compared to existing conditions. However, the Master Plan would include open space areas, including landscaped areas and 59 acres of parks, trails, and open space, which would remain largely pervious. This includes the portion of Big Dry Creek Reservoir Outlet Works Channel that runs through the Master Plan Area. The Groundwater Levels Memorandum determined that development of the Master Plan Area would reduce precipitation-based recharge by approximately 66 AFY; however, this reduction would be offset by elimination of existing on-site groundwater pumping (approximately 10 AFY reduction in extraction), leakage from the City's pressurized water distribution system (approximately 9 AFY of recharge), and deep percolation of applied landscape irrigation (approximately 117 AFY of

recharge). Accounting for these factors, the proposed Master Plan would result in a net increase of approximately 70 AFY in groundwater replenishment.

Further, future development within the Master Plan would be reviewed for project-specific impacts related to groundwater recharge and would implement applicable measures to address any potential impacts. New projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP and specify BMPs, consistent with the GSP. Additionally, as noted in the WSA, the City has adequate water supplies to meet the needs of all City customers, including those in the Master Plan Area, over the 20-year planning horizon. Thus, groundwater usage would not be anticipated to increase such that recharge of the Kings Subbasin would be impeded. Moreover, as described above, the Groundwater Levels Memorandum determined that local domestic wells surrounding the Master Plan Area are not expected to be impacted because the project would result in net groundwater replenishment and would not require new groundwater wells.

For the reasons mentioned above, the Master Plan would not cause the substantial depletion of groundwater supplies, interfere substantially with groundwater recharge, or conflict with the GSP. As such, development of the Master Plan would have a less than significant impact relative to this topic. Thus, impacts related to groundwater supply or recharge would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

The cumulative setting for the Vista Ranch Development is the same as that described above in MP Area 2. Thus, there is no existing cumulative impact. As discussed in the Master Plan Area discussion above, the City is projected to have adequate water supply to meet the needs of the City, including the Vista Ranch Development, during normal to multiple-dry water years during a 20-year projection, in addition to existing and planned future uses. Therefore, the City can serve the proposed Vista Ranch Development, in addition to existing and planned developments, with the existing and planned future water supplies. Thus, the proposed Vista Ranch Development would not substantially decrease groundwater supplies that would impede sustainable groundwater management or recharge of the basin; refer to Section 3.17, Utilities and Service Systems, regarding water supplies.

As described above, the Vista Ranch Development would result in new impervious surfaces, which could reduce rainwater infiltration and groundwater recharge compared to existing conditions. However, the Vista Ranch Development would include multiple parks and trails totaling approximately 20 acres dispersed throughout the development, as well as private parks, which would remain largely pervious. Additionally, the Vista Ranch Development would include bioretention areas and would implement BMPs, in accordance with the SWPPP, to ensure runoff is directed to pervious areas where applicable. Further, areas developed with impervious surfaces would route stormwater into the proposed Vista Ranch Development's storm drainage system and to FMFCD facilities designed to retain and infiltrate groundwater, eventually discharging to irrigation canals, creeks, and the San Joaquin River. As discussed above, the Groundwater Levels Memorandum determined that the proposed Master Plan would reduce precipitation-based recharge by approximately 66 AFY but would offset that reduction through elimination of existing on-site groundwater pumping (approximately 10

AFY reduction in extraction), leakage from the City's pressurized water distribution system (approximately 9 AFY of recharge), and deep percolation of applied landscape irrigation (approximately 117 AFY of recharge), resulting in a net increase of approximately 70 AFY in groundwater replenishment. Therefore, the proposed Vista Ranch Development would not adversely affect local domestic wells surrounding the Master Plan Area, would not cause the substantial depletion of groundwater supplies, would not interfere substantially with groundwater recharge, and would not conflict with the GSP. As such, development of the Vista Ranch Development would have a less than significant impact relative to this topic. Thus, impacts related to groundwater supply or recharge would result in a less than cumulatively considerable contribution, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Drainage Leading to Erosion/Siltation, Flooding, Additional Sources of Polluted Runoff, or Impedance of Flood Flows

Impact HYD-3: **The proposed project would not 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?

Impact Analysis

Erosion or Siltation

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in substantial erosion or siltation. As such, no impact would occur.

MP Area 2

Construction

The proposed Master Plan would have a significant impact if it were to substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Such drainage effects could occur from grade changes at the SOI Expansion Area, exposure of soils for periods of time during stormwater discharge, or alterations to creek beds. These types of changes would have a potentially significant impact to on-site drainage patterns.

The proposed Master Plan would involve grading and construction within the Master Plan Area which is currently primarily composed of pervious surfaces. Construction activity could result in substantial erosion or siltation, leading to drainage pattern alteration and the increased potential for polluted runoff to enter nearby water bodies. This would represent a potentially significant impact.

However, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters, and specify BMPs that would be used by that project to minimize pollution of stormwater. These BMPs may include scheduling and timing of grading (soil disturbing) activities, timely revegetation of graded areas, the use of hydroseed and hydraulic mulches, and installation of erosion control blankets.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Sediment control may include properly sized detention basins, dams, or filters to reduce entry of suspended sediment into the storm drain system and watercourses and installation of construction entrances to prevent tracking of sediment onto adjacent streets.

The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Therefore, construction impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

Operation

Development of future projects in the Master Plan Area would increase impervious surfaces compared to existing conditions. Thus, projects within the Master Plan operation could result in increased amounts of stormwater runoff that could carry pollutants into nearby water bodies. However, the proposed Master Plan would include construction of a new storm drainage system for MP Area 2. The exact sizing of the underground piping would be engineered in coordination with FMFCD during the preparation of the improvement plans. As such, the proposed storm drainage system would have sufficient capacity to serve the proposed Master Plan. Additionally, each future project would require project-specific analysis to identify operational measures to reduce any potential

impact. Therefore, operational impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

Vista Ranch Development/MP Area 1

Construction

The proposed Vista Ranch Development would be required to comply with the regulations of its NPDES permit. Additionally, the proposed Vista Ranch Development would be required to comply with construction-phase BMPs and requirements for erosion and sedimentation control plans, as outlined above. These BMPs may include scheduling and timing of grading (soil disturbing) activities, timely revegetation of graded areas, the use of hydroseed and hydraulic mulches, and installation of erosion control blankets. Sediment control may include properly sized detention basins, dams, or filters to reduce entry of suspended sediment into the storm drain system and watercourses and installation of construction entrances to prevent tracking of sediment onto adjacent streets. Pollution prevention practices may include designated washout areas or facilities, control of trash and recycled materials, covering of materials stored on-site, and proper location of and maintenance of temporary sanitary facilities.

Additionally, as described above, the proposed Vista Ranch Development would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized to the maximum extent feasible during construction. The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Therefore, construction impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

Operation

Development of MP Area 1 would increase impervious surfaces compared to existing conditions. Thus, the proposed Vista Ranch Development operation could result in increased amounts of stormwater runoff that could carry pollutants into nearby water bodies. However, the proposed Vista Ranch Development would include the construction of a new storm drainage system for MP Area 1. The exact sizing of the underground piping would be engineered in coordination with FMFCD during the preparation of the improvement plans. As such, the proposed storm drainage system would have sufficient capacity to serve the proposed Vista Ranch Development. Therefore, operational impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant.

Surface Runoff

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in substantial surface runoff. As such, no impact would occur.

MP Area 2

Construction

As previously discussed, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by that project to minimize pollution of stormwater.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. As such, construction-related impacts would be less than significant.

Operation

The proposed Master Plan would increase the number of impervious surfaces, thereby increasing the amount of surface runoff. This increase could result in a potentially significant impact. However, as described above, the proposed Master Plan's new stormwater drainage system would have sufficient stormwater capacity to serve the proposed project, preventing surface runoff. In addition, each future project would require project-specific analysis to identify operational measures to reduce any potential impact. As such, the operation of the proposed project would not result in substantial on-site flooding. Therefore, the operational impact related to increased impervious surfaces that would in turn increase the rate or amount of surface runoff, resulting in flooding, would be less than significant.

Vista Ranch Development/MP Area 1

Construction

As previously discussed, the proposed Vista Ranch Development would implement a project-specific SWPPP and incorporate BMPs contained within to reduce the potential for water quality impacts related to erosion, sedimentation, and other construction-related pollutants that may result in surface runoff. As such, construction-related impacts would be less than significant.

Operation

The proposed Vista Ranch Development would increase the number of impervious surfaces, thereby increasing the amount of surface runoff. This increase could result in a potentially significant impact. However, as described above, the proposed Vista Ranch Development's new stormwater drainage system would have sufficient stormwater capacity to serve the proposed project, preventing surface runoff. As such, the operation of the Vista Ranch Development would not result in substantial on-site flooding. Therefore, the operational impact related to increased impervious surfaces that would in turn increase the rate or amount of surface runoff, resulting in flooding, would be less than significant.

Exceedance of Storm Drain Capacity

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in an exceedance of storm drain capacity. As such, no impact would occur.

MP Area 2

Construction

As previously discussed, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by that project to minimize pollution of stormwater.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Therefore, the construction impact related to exceedance of storm drain capacity would be less than significant.

Operation

The proposed Master Plan would result in increased impervious surface area and increased runoff. Consistent with Provision C.3 Central Valley Regional Municipal Stormwater NPDES Permit, Low Impact Development (LID) techniques are required to be implemented in order to treat stormwater runoff. LID techniques, such as bioretention areas, allow for stormwater infiltration into the soil and detain stormwater on-site in order to reduce peak flows and prevent erosion and siltation. Stormwater on the SOI Expansion Area would be captured via a new storm drainage system for the Master Plan Area. The exact sizing of the underground piping would be engineered in coordination with FMFCD during the preparation of the improvement plans. As such, the proposed storm drainage system would have sufficient capacity to serve the proposed Master Plan designed in accordance with all applicable standards with adequate capacity to accommodate stormwater flows at the SOI Expansion Area. Because stormwater would be treated through bioretention areas to ensure no net increase in off-site stormwater flow, the proposed project would not result in an exceedance of storm drain capacity. Therefore, impacts would be less than significant.

Vista Ranch Development/MP Area 1

Construction

As previously discussed, the proposed Vista Ranch Development would be required to implement a SWPPP as part of its Construction General Permit to ensure that additional sources of polluted runoff are prevented during construction. Thus, construction of the proposed Vista Ranch Development would not create or contribute to runoff water that would provide substantial additional sources of

polluted runoff. Therefore, the construction impact related to exceedance of storm drain capacity would be less than significant.

Operation

The proposed Vista Ranch Development would result in increased impervious surface area and increased runoff. Consistent with Provision C.3 Central Valley Regional Municipal Stormwater NPDES Permit, LID techniques are required to be implemented in order to treat stormwater runoff. LID techniques, such as bioretention areas, allow for stormwater infiltration into the soil and detain stormwater on-site in order to reduce peak flows and prevent erosion and siltation. Stormwater on the SOI Expansion Area would be captured via a new storm drainage system for MP Area 1. As such, the proposed storm drainage system would have sufficient capacity to serve the proposed Vista Ranch Development, designed in accordance with all applicable standards, with adequate capacity to accommodate stormwater flows within MP Area 1. Because stormwater would be treated through bioretention areas to ensure no net increase in off-site stormwater flow, the proposed Vista Ranch Development would not result in an exceedance of storm drain capacity. Therefore, impacts would be less than significant.

Flood Flows

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in any impedance of flood flows. As such, no impact would occur.

MP Area 2

The proposed Master Plan would include construction of a new storm drainage system to serve the Master Plan Area, which would be required to conform to applicable regulations, standards, and specifications of the State Water Board, FMFCD, and City. This includes, but is not limited to, the municipal NPDES stormwater permit and the City's Urban Storm Water Quality Management and Discharge Control Ordinance, which would require the implementation of BMPs to control the volume, rate, and potential pollutant load of stormwater runoff. With the design, construction, and maintenance of flood control improvements in accordance with these requirements, the proposed Master Plan would not substantially increase the rate or amount of surface runoff in a manner that would impede or redirect flood flows; impacts would be less than significant in this regard.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would include construction of a new storm drainage system to serve MP Area 1, which would be required to conform to applicable regulations, standards, and specifications of the State Water Board, FMFCD, and City. This includes, but is not limited to, the municipal NPDES stormwater permit and the City's Urban Storm Water Quality Management and Discharge Control Ordinance, which would require the implementation of BMPs to control the volume, rate, and potential pollutant load of stormwater runoff. With the design, construction, and maintenance of flood control improvements in accordance with these requirements, the proposed

Vista Ranch Development would not substantially increase the rate or amount of surface runoff in a manner that would impede or redirect flood flows; impacts would be less than significant in this regard.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects could have a significant impact if they were to substantially alter the existing drainage pattern in a manner that would result in substantial erosion or siltation. Such drainage effects could occur from grading changes at individual project sites, exposure of soils for periods of time during stormwater discharge, or alterations to creek beds.

The nearest project is located adjacent to the SOI Expansion Area and would be required to comply with the regulations of its NPDES permit. Additionally, any cumulative projects would be required to comply with construction-phase BMPs and requirements for erosion and sediment control plans. These BMPs may include scheduling and timing of grading (soil disturbing) activities, timely revegetation of graded areas, the use of hydroseed and hydraulic mulches, and installation of erosion control blankets. With compliance with NPDES permit requirements and BMPs, cumulative impacts would be less than significant.

Additionally, future development more than 1 acre in size within MP Area 2 would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized during construction. The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Additionally, during operation, implementation of the stormwater control plan would prevent erosion and siltation caused by stormwater flows in accordance with the City's NPDES. Furthermore, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Therefore, construction and operation impacts related to alteration of drainage patterns resulting in

erosion or siltation would be less than significant and the proposed development of MP Area 2 would not result in a cumulatively considerable contribution.

Impacts related to the impedance of flood flows would only occur during operation. As such, no cumulative construction impedance of flood flow impacts would occur. Cumulative projects could increase the amount of new impervious surfaces. However, all cumulative development would be required to adhere to existing regulations to address stormwater management in a manner that ensures that flooding would not increase and flood flows would not be redirected to other areas currently prone to flooding. All cumulative projects would be required to include stormwater management features, and, therefore, cumulative impacts would be less than significant. The proposed development of MP Area 2 would not result in a cumulatively considerable contribution and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

Cumulative projects could have a significant impact if they were to substantially alter the existing drainage pattern in a manner that would result in substantial erosion or siltation. Such drainage effects could occur from grading changes at individual project sites, exposure of soils for periods of time during stormwater discharge, or alterations to creek beds.

The nearest project is located adjacent to the SOI Expansion Area and would be required to comply with the regulations of its NPDES permit. Additionally, any cumulative projects would be required to comply with construction-phase BMPs and requirements for erosion and sediment control plans. These BMPs may include scheduling and timing of grading (soil disturbing) activities, timely revegetation of graded areas, the use of hydroseed and hydraulic mulches, and installation of erosion control blankets. With compliance with NPDES permit requirements and BMPs, cumulative impacts would be less than significant.

Additionally, the proposed Vista Ranch Development would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized during construction. The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Additionally, during operation, implementation of the stormwater control plan would prevent erosion and siltation caused by stormwater flows in accordance with the City's NPDES. Therefore, construction and operation impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant and the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to less than significant impacts.

Impacts related to the impedance of flood flows would only occur during operation. As such, no cumulative construction impedance of flood flow impacts would occur. Cumulative projects could increase the amount of new impervious surfaces. However, all cumulative development would be required to adhere to existing regulations to address stormwater management in a manner that ensures that flooding would not increase and flood flows would not be redirected to other areas currently prone to flooding. All cumulative projects would be required to include stormwater management features, and, therefore, cumulative impacts would be less than significant.

Additionally, the proposed Vista Ranch Development would not result in a cumulatively considerable contribution to the less than significant cumulative impact. The proposed Vista Ranch Development's new storm drainage system and stormwater treatment infrastructure would have sufficient capacity to accommodate the proposed Vista Ranch Development during storm events to ensure no net increase in off-site flow of stormwaters. Therefore, the proposed Vista Ranch Development's contribution to cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Risk of Pollutant Release Caused by Inundation

Impact HYD-4:	**The proposed project would not be located in a flood hazard zone, tsunami, or seiche zone, or risk release of pollutants due to project inundation.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result the release of pollutants caused by project inundation. As such, no impact would occur.

MP Area 2

Most of the SOI Expansion Area is located within an area of minimal flood hazard. A portion of the SOI Expansion Area is located within the 500-year flood zone and a portion of the SOI Expansion Area, within the Big Dry Creek Reservoir Outlet Works Channel (a man-made channel), is within the 100-year flood zone. The portion of the SOI Expansion Area within the 100-year flood zone (associated with Big Dry Creek Reservoir Outlet Works Channel) runs in a southwesterly direction through the center of the Master Plan Area. There are no areas of the Master Plan Area that are designated as having an increased flood risk from a levee, nor are any of these areas located within a regulatory floodway.

The Master Plan Area is approximately 118 miles from the coastline of the Pacific Ocean, which is sufficiently distant to preclude effects from a tsunami. Additionally, as stated in the Fresno County Multi-Jurisdictional Hazard Mitigation Plan, earthquake-induced seiches are not considered a risk in Fresno County.[37] Further, as stated in the General Plan EIR, the Big Dry Creek Reservoir is generally

[37] Amec Foster Wheeler. 2024. Fresno County Multi-Jurisdictional Hazard Mitigation Plan. May. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/2/public-health/fresno-county-hmp-final.pdf. Accessed December 10, 2025.

not at full capacity, and the water level changes throughout the year depending on the amount of rainfall received.[38] While the Big Dry Creek Reservoir has a maximum capacity of 30,200 AF, only 6,126 AF or 20 percent of the total capacity was used during the record-breaking storms of December 2022 and January/February 2023.[39] Given the low risk of earthquake-induced seiche and the low water levels of the dam, risks of seiches to the Master Plan Area would be low.

Portions of the Master Plan Area are located within dam failure inundation areas associated with the Big Dry Creek Dam. The Big Dry Creek Dam is under the oversight of the DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. The proposed Master Plan would not result in actions that could result in a higher likelihood of dam failure at Big Dry Creek Dam. There will always be a remote chance of dam failure that results in flooding within dam inundation areas, including the Master Plan Area. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event. Additionally, as noted in Section 3.9, Hazards and Hazardous Materials, Big Dry Creek Dam is required to have an Emergency Action Plan (EAP). This EAP includes actions to further ensure protection from dam inundation risks, such as pollutant release.

In their comment letter during the NOP scoping period, FMFCD recommended an Open Space–Corridor or park use within 500 feet from the toe of the Big Dry Creek Reservoir to Shepherd Avenue, unless a Geotechnical Report recommends that development closer than 500 feet is feasible. This recommendation is applicable to the southeastern parcels (APNs: 558-010-17S or 558-010-15). Because no development in those parcels is proposed at this time and future development is unknown, future development projects within 500 feet of the Big Dry Creek Reservoir within MP Area 2 would be required to implement MM HYD-4, which requires retaining a 500-foot open space buffer unless a Geotechnical Report is provided that determines development closer than 500 feet is feasible.

The proposed Master Plan is not anticipated to result in an increased risk of release of pollutants caused by project inundation, including flooding because of the failure of a levee or dam, seiche, or tsunami. This impact is considered less than significant with mitigation incorporated.

Vista Ranch Development/MP Area 1

There are no areas of MP Area 1 that are designated as having an increased flood risk from a levee, nor are any of these areas located within a regulatory floodway. MP Area 1 is approximately 118 miles from the coastline of the Pacific Ocean, which is sufficiently distant to preclude effects from a tsunami.

[38] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report, Chapter 5.9, Hydrology and Water Quality. August. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-09-Hydrology-and-Water-Quality.pdf?t=202507181312560&t=202507181312560. Accessed December 10, 2025.

[39] Fresno Metropolitan Flood Control District (FMFCD). 2025. Big Dry Creek Dam. Website: https://fresnometroh2o.com/dams/big-dry-creek-dam/. Accessed May 16, 2025.

As stated in the Fresno County Multi-Jurisdictional Hazard Mitigation Plan, earthquake-induced seiches are not considered a risk in Fresno County.[40] Additionally, as stated in the General Plan EIR, the Big Dry Creek Reservoir is generally not at full capacity, and the water level changes throughout the year depending on the amount of rainfall received.[41] While the Big Dry Creek Reservoir has a maximum capacity of 30,200 AF, only 6,126 AF or 20 percent of the total capacity was used during the record-breaking storms of December 2022, and January/February 2023.[42] Given the low risk of earthquake-induced seiche and the low water levels of the dam, risks of seiches to MP Area 1 would be low.

MP Area 1 is located within dam failure inundation areas associated with the Big Dry Creek Dam. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. The proposed Vista Ranch Development would not result in actions that could result in a higher likelihood of dam failure at Big Dry Creek Dam. There would always be a remote chance of dam failure that results in flooding within dam inundation areas, including MP Area 1. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event. Additionally, as noted in Section 3.9, Hazards and Hazardous Materials, Big Dry Creek Dam is required to have an EAP. This EAP includes actions to further ensure protection from dam inundation risks, such as pollutant release.

Furthermore, the Geotechnical Engineering Investigation, Proposed Triangle Development, Shepherd and Temperance Avenues, Clovis, California, prepared by Krazan & Associates, Inc., and dated January 31, 2024 (2024 Geotechnical Investigation), which is included in Appendix G, determined that development was feasible approximately 250 feet from the dam with the inclusion of a 2-foot-wide and 10-foot-deep interceptor trench. The proposed Master Plan includes a 250-foot buffer designated as Open Space – Park (Private) and Open Space – Preserved Open Space, respectively, within the areas nearest to the dam on the northeastern border of the Master Plan Area, as shown in Exhibit 2-9.

The proposed Vista Ranch Development is not anticipated to result in an increased risk of release of pollutants from project inundation, including flooding because of the failure of a levee or dam, seiche, or tsunami. This impact is considered less than significant.

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[40] County of Fresno. 2024. Hazard Mitigation Plan. May. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/resources/hazard-mitigation-plan/draft-2024-fresno-county-hazard-mitigation-plan.pdf. Accessed October 15, 2025.

[41] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report, Chapter 5.9, Hydrology and Water Quality. August. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-09-Hydrology-and-Water-Quality.pdf?t=202507181312560&t=202507181312560. Accessed December 10, 2025.

[42] Fresno Metropolitan Flood Control District (FMFCD). 2025. Big Dry Creek Dam. Website: https://fresnometroh2o.com/dams/big-dry-creek-dam/. Accessed May 16, 2025.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

MM HYD-4 For any future development proposed on parcels with Assessor Parcel Numbers (APNs) 558-010-17S and/or 558-010-15 within 500 feet of the toe of the Big Dry Creek Reservoir, the project applicant shall maintain a minimum 500-foot Open Space–Corridor, park, or equivalent non-structural land use buffer from the reservoir unless a qualified Geotechnical Report prepared by a California-licensed Geotechnical Engineer demonstrates that development at a reduced setback would be geotechnically supported.

The Geotechnical Report shall:

1. Evaluate site-specific dam-related geotechnical conditions (including slope stability, subsurface conditions, and potential inundation-related hazards).
2. Identify the minimum safe development setback from the reservoir based on site conditions.
3. Provide specific design and engineering recommendations (e.g., excavation, grading, interceptor trenches, foundations, or other measures) necessary to ensure that development within the recommended setback would not expose people or structures to a significant hazard.

If the Geotechnical Report concludes that development closer than 500 feet is not feasible or safe, the default 500-foot Open Space buffer shall be required.

Prior to approval of any future subdivision map, site plan, grading permit, or development application within 500 feet of the reservoir, the City of Clovis shall:

- Review and approve the Geotechnical Report for adequacy; and
- Ensure that all project plans incorporate the required setback and all geotechnical recommendations.

Level of Significance After Mitigation

MP Area 2

Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects could have a significant impact if they were to substantially increase the risk of pollutant release from inundation or be located in a flood hazard zone, tsunami, or seiche zone. Any cumulative projects would be required to comply with applicable federal, State, and local requirements related to development within a flood zone, inundation, or pollutant release. Therefore, cumulative impacts would be less than significant.

As shown on Exhibit 3.10-2, most of the SOI Expansion Area is located within an area of minimal flood hazard. A portion of the SOI Expansion Area is located within the 500-year flood zone and a portion of the SOI Expansion Area, within the Big Dry Creek Reservoir Outlet Works Channel (a man-made channel), is within the 100-year flood zone. The portion of the SOI Expansion Area within the 100-year flood zone (associated with Big Dry Creek Reservoir Outlet Works Channel) runs in a southwesterly direction through the center of the Master Plan Area. There are no areas of proposed development within the Master Plan Area that are designated as having an increased flood risk from a levee, nor are any of these areas located within a regulatory floodway.

The Master Plan Area is located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. The Big Dry Creek Dam is under the oversight of the DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. The proposed Master Plan would not result in actions that could result in a higher likelihood of dam failure at Big Dry Creek Dam. There will always be a remote chance of dam failure that results in flooding within dam inundation areas, including the Master Plan Area and other surrounding areas. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event.

Moreover, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by that project to minimize impacts to the alteration of existing drainage patterns. Such BMPs may include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover. Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Through compliance with these existing regulations and with the implementation of MM

HYD-4, development of the proposed Master Plan would not result in a cumulatively considerable contribution relative to this topic, and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The existing cumulative setting for the Vista Ranch Development is the same as MP Area 2, described above. Implementation and operation of the proposed Vista Ranch Development (as well as the cumulative projects listed in Table 3-1) would require conformance with State and federal regulatory requirements related to hydrology and water quality, including applicable elements of the CWA, NPDES, Porter-Cologne Act, FEMA floodplain standards, and RWQCB Basin Plan. These regulatory requirements constitute a regional basin-wide effort to implement hydrology and water quality protections. Accordingly, there is not a cumulative impact related to pollutant release from inundation.

Additionally, the proposed project would be required to design and implement a SWPPP to ensure that erosion, siltation, and flooding are prevented or minimized during construction. The SWPPP would include both structural (physical devices or measures) and operational (timing of construction) BMPs that would prevent or reduce the discharge of pollutants directly or indirectly into waterbodies. Additionally, during operation, implementation of the stormwater control plan would prevent erosion and siltation caused by stormwater flows in accordance with the County's NPDES. Therefore, construction and operation impacts related to alteration of drainage patterns resulting in erosion or siltation would be less than significant and the proposed project would not result in a cumulatively considerable contribution to less than significant impacts.

Moreover, the proposed project's contribution to this less than significant cumulative impact would not be cumulatively considerable. As previously discussed, most of the SOI Expansion Area is located within an area of minimal flood hazard. A portion of the SOI Expansion Area is located within the 500-year flood zone and a portion of the SOI Expansion Area, within the Big Dry Creek Reservoir Outlet Works Channel (a man-made channel), is within the 100-year flood zone. The portion of the SOI Expansion Area within the 100-year flood zone (associated with Big Dry Creek Reservoir Outlet Works Channel) runs in a southwesterly direction through the center of the Development Area. There are no areas of proposed development within MP Area 1 that are designated as having an increased flood risk from a levee, nor are any of these areas located within a regulatory floodway.

MP Area 1 is located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. The Big Dry Creek Dam is under the oversight of the DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. The proposed Vista Ranch Development would not result in actions that could result in a higher likelihood of dam failure at Big Dry Creek Dam. There will always be a remote chance of dam failure that results in flooding within dam inundation areas, including the Master Plan Area and other surrounding areas. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered to have an extremely low probability of occurring and is not considered to be a reasonably foreseeable event. Through compliance with these existing regulations, development of the proposed Vista Ranch Development would result in a less than significant and less than cumulatively considerable impact relative to this topic.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Water Quality Control or Sustainable Groundwater Management Plans Consistency

Impact HYD-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As such, no impact would occur.

MP Area 2

The Basin Plans and the North Kings GSP are the guiding documents for water quality and sustainable groundwater management in the Master Plan Area.

The local Basin Plans are maintained by the Central Valley RWQCB. The Basin Plans specify the State's water quality standards (i.e., beneficial uses, water quality objectives, and antidegradation policy) and serve as the basis for the RWQCB's regulatory programs. When permittees and projects comply with the provisions of applicable NPDES permits and water quality permitting, they are consistent with local Basin Plans. New projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by that project to minimize pollution of stormwater. Such BMPs may include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. Compliance with these applicable regulations would ensure consistency of future projects within the Master Plan with the Basin Plan.

The Kings Subbasin was designated a high-priority basin. In compliance with SGMA, the NKGSA adopted the North Kings GSP and submits an annual report to the DWR detailing groundwater conditions for the Subbasin and GSP implementation status for the prior year. The North Kings GSP, in coordination with the other six GSAs in the Kings Subbasin, guides sustainable management of the Subbasin and achieves compliance with SGMA. As discussed in Impact HYD-2, the proposed Master Plan would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed Master Plan may impede sustainable groundwater management of the Subbasin. Additionally, as described under Impact HYD-1 future development within the proposed Master Plan would be required to implement BMPs to reduce stormwater quality impacts that could impact water quality within the Subbasin. Compliance with applicable regulations would ensure Master Plan consistency with the North Kings GSP. This impact is considered less than significant.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would be required to prepare a SWPPP and monitoring plan and implement BMPs in compliance with the MS4 Permit. The proposed Vista Ranch Development would also be subject to applicable City of Clovis water quality regulations, including, but not limited to, the City's Urban Storm Water Quality Management and Discharge Control Ordinance. Compliance with these applicable regulations would ensure Vista Ranch Development consistency with the Basin Plan.

The Kings Subbasin was designated a high-priority basin. In compliance with SGMA, the NKGSA adopted the North Kings GSP and submits an annual report to the DWR detailing groundwater conditions for the Subbasin and GSP implementation status for the prior year. The North Kings GSP, in coordination with the other six GSAs in the Kings Subbasin, guides sustainable management of the Subbasin and achieves compliance with SGMA. The proposed Vista Ranch Development would be subject to compliance with the GSP. As discussed in Impact HYD-2, the proposed Vista Ranch Development would not decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed Vista Ranch Development may impede sustainable groundwater management of the Subbasin. Additionally, as described under Impact HYD-1, the proposed Vista Ranch Development would be required to implement BMPs to reduce stormwater quality impacts that could impact water quality within the Subbasin. Compliance with applicable regulations would ensure Vista Ranch Development consistency with the North Kings GSP. This impact is considered less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The Central Valley RWQCB has established regulatory standards and objectives for water quality within its jurisdiction in its Basin Plan. The cumulative projects listed in Table 3-1 would be subject to compliance with the Basin Plan and/or, as applicable, the City's NPDES program. Because conformance with these requirements would be required for all cumulative projects, cumulative hydrology/water quality impacts would be less than significant.

In accordance with the NPDES Stormwater Program, new projects that are 1 acre or larger in size would be required to comply with the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board, and would need to develop and implement a SWPPP to estimate sediment risk from construction activities to receiving waters and specify BMPs that would be used by that project to minimize impacts related to increased impervious surfaces and alteration of drainage patterns. Such BMPs may include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover.

Additionally, future project construction activities would be required to comply with the Urban Storm Water Quality Management and Discharge Control Ordinance and other applicable provisions in the CMC. Future projects in MP Area 2 would also incorporate appropriate erosion and sediment control measures per Section 9.110.040 of the CMC and adhere to the City's landscape standards designed to reduce runoff and control soil erosion. The BMPs and SWPPPs would be reviewed by the RWQCB as part of the permitting process. A SWPPP, once approved, would be kept on-site and implemented during construction activities and must be made available upon request to representatives of the RWQCB and/or the Lead Agency. The RWQCB has stated that these erosion control measures are only examples of what should be considered and should not preclude new or innovative approaches currently available or being developed. The specific controls are subject to review and approval by the RWQCB.

The ongoing operational phase of the proposed Master Plan (all phases) would result in the discharge of stormwater, which would ultimately flow into the FMFCD system. Similarly, operations for individual projects within the Master Plan would be required to implement BMPs. The standards and regulations contained above would ensure that BMPs are implemented to reduce the amount of pollution in stormwater discharged from the Master Plan Area into the FMFCD system. Stormwater drainage is managed through the implementation of BMPs to the extent that they are technologically achievable to prevent and reduce pollutants. The City requires reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses. The management of water quality through BMPs is intended to ensure that water quality does not degrade to levels that would violate water quality standards. Thus, development of

the proposed Master Plan would have a less than significant impact relative to this topic. As such, impacts related to water quality would result in a less than cumulatively considerable contribution, and cumulative impacts would be less than significant.

Vista Ranch Development/MP Area 1

The Central Valley RWQCB has established regulatory standards and objectives for water quality within its jurisdiction in its Basin Plan. The cumulative projects listed in Table 3-1 would be subject to compliance with the Basin Plan and/or, as applicable, the City's NPDES program. Because conformance with these requirements would be required for all cumulative projects, cumulative hydrology/water quality impacts would be less than significant.

In accordance with the NPDES Stormwater Program, the proposed Vista Ranch Development requires an approved SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, and runoff during construction activities. Such BMPs may include: temporary erosion control measures such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, sandbag dikes, and temporary revegetation or other ground cover. The ongoing operational phase of the proposed Master Plan (all phases) would result in the discharge of stormwater, which would ultimately flow into the FMFCD system. Similarly, operations for individual projects within the Master Plan would be required to implement BMPs. The standards and regulations contained above would ensure that BMPs are implemented to reduce the amount of pollution in stormwater discharged from the Master Plan Area into the FMFCD system. The discharge of stormwater must be treated through BMPs prior to its discharge. The standards and regulations contained above would ensure that BMPs are implemented to reduce the amount of pollution in stormwater discharged from MP Area 1 into the FMFCD system. Stormwater drainage is managed through the implementation of BMPs to the extent that they are technologically achievable to prevent and reduce pollutants. The City requires reasonable protection from accidental discharge of prohibited materials or other wastes into the municipal storm drain system or watercourses. The management of water quality through BMPs is intended to ensure that water quality does not degrade to levels that would violate water quality standards, including those related to the GSP. As such, impacts related to water quality would result in a less than cumulatively considerable contribution, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.11 - Land Use and Planning

3.11.1 - Introduction

This section describes the existing land use and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based, in part, on the following reference documents: City of Clovis General Plan (General Plan); City of Clovis General Plan and Development Code Update Environmental Impact Report (General Plan EIR); Fresno County General Plan; Fresno County Zoning Ordinance; and City of Clovis Municipal Code (CMC), Title 9–Development Code.

During the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period, the following comments were received related to land use and planning:

- Comment(s) encouraging the City to continue finding solutions to minimize the impact of land use changes. (pp. 3.11-14 to 3.11-41)
- Comment(s) requesting that the proposed Vista Ranch Master Plan (Master Plan) limit the types of industrial uses allowed in the area to be conducive to adjacent school and residential uses. (pp. 3.11-32 to 3.11-33)
- Comment(s) requesting that the Revised Draft EIR evaluate the most intensive uses allowed in the light industrial land use designation to determine environmental impacts. (pp. 3.11-35 to 3.11-36)
- Comment(s) proposing not to develop with high-density residential uses north of the canal. (pp. 3.11-18 to 3.11-19)
- Comment(s) expressing concerns related to an increase in housing density and a suggestion to have a minimum of 1-acre lot sizes adjacent to existing development. (p. 3.11-19)

3.11.2 - Environmental Setting

Land Uses, Designations, and Zoning

Sphere of Influence Expansion Area

Current Land Uses

The Sphere of Influence (SOI) Expansion Area currently consists of a combination of fallow and grazing land, several rural residences, offices, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. The proposed Master Plan Area is bisected by the Big Dry Creek Reservoir Channel, and the Non-development Area contains existing rural residential uses and agricultural fields.

Land Use Designations and Zoning

Exhibit 2-4 and Exhibit 2-5 show current County General Plan land use designations and zoning for the SOI Expansion Area and surrounding vicinity. The SOI Expansion Area is currently designated Agriculture and zoned for agricultural use (Exclusive Agricultural [AE20], Limited Agricultural [AL20], and Rural Residential [RR]). Within the AL-20 Zone District in the southeast portion of the Master Plan Area, the County has also recently approved a mini-storage facility under Conditional Use Permit (CUP) No. 3526; this facility is currently operational.[1]

The majority of the SOI Expansion Area is within the City's Northeast Urban Center (NEUC), an area that has been designated as a focus of planned growth since the early 1990s. As a result, the current General Plan also provides land use designations for the SOI Expansion Area and vicinity. As shown in Exhibit 2-6, these comprise a variety of uses, including residential development at a range of densities, parks/open space, schools, and mixed-use village.

Surrounding Area

West

The northern portion of the SOI Expansion Area is adjacent to land designated by the City as water and for very low-density residential. Additionally, the southern portion of the SOI Expansion Area is adjacent to land designated by the City for rural residential and a planned residential development community.

North

The SOI Expansion Area is adjacent to vacant land designated by the City for agriculture, rural residential development, and open space.

East

The SOI Expansion Area is adjacent to vacant land designated by the City as open space. Additionally, Big Dry Creek and Big Dry Creek Reservoir are adjacent to the SOI Expansion Area.

South

The SOI Expansion Area is bounded by East Shepherd Avenue and is adjacent to residential development designated by the City for very low- and low-density residential development, as well as rural residential development.

[1] County of Fresno. 2021. Inter Office Memo: Resolution No. 12914—Initial Study No. 7085 and Classified Conditional Use Permit Application No. 3526. November 18. Website: https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/66945-reso-12914-cup-3526.pdf. Accessed February 25, 2025.

3.11.3 - Regulatory Framework

Federal

No federal plans, policies, regulations, or laws related to land use and planning are applicable to the proposed project.

State

No State plans, policies, regulations, or laws related to land use and planning are applicable to the proposed project.

Regional

Fresno Council of Governments

The Fresno Council of Governments (Fresno COG) is an association of local governments from cities within Fresno County. The member agencies include Cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, Selma, and County of Fresno.[2]

Regional Transportation Plan/Sustainable Communities Strategy

Fresno COG is responsible for the preparation of, and updates to, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the region. The RTP/SCS provides a 25-year transportation vision and strategies for air emissions reduction. The 2022 RTP/SCS was adopted by the Fresno COG Policy Board July 28, 2022.[3] The 2022 RTP/SCS marks the first edition since the COVID-19 pandemic began in early 2020 and upended many traditional planning processes and assumptions. These range from the potential for greater telecommuting options and Vehicle Miles Traveled (VMT) savings, to new strategies for public participation.[4]

The 2022 RTP/SCS is a long-range plan for transportation improvements in the region. The RTP/SCS identifies existing and future transportation related needs, while considering all modes of travel, analyzing alternative solutions, and identifying anticipated available funding for over 3,000 projects and multiple programs. The plan is based on projections for growth in population, housing, and jobs. Fresno COG determines the regional growth projections by evaluating baseline data (existing housing units and employees, jobs/housing ratio, and percent of regional growth share for housing units and employees), historic reference data (based upon 5- and 10-year residential building permit averages and historic County-level employment statistics), capacity data (General Plan data for each jurisdiction), and current RTP data about assumptions used in the most recent RTP/SCS. Fresno COG staff then meet with each jurisdiction to discuss and incorporate more subjective considerations about planned growth for each area. Finally, Fresno COG makes a regional growth forecast for new

[2] Fresno Council of Governments (Fresno COG). 2025. About Fresno COG. Website: https://www.fresnocog.org/about-cog/. Accessed April 16, 2025.

[3] Fresno Council of Governments (Fresno COG). 2022. Regional Transportation Plan. Website: https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/. Accessed April 16, 2025.

[4] Ibid.

homes and new jobs based upon an economic analysis provided by a recognized expert in order to estimate regional growth potential based on market analysis and related economic data. This growth forecast is then incorporated into the RTP/SCS.

Regional Housing Needs Plan

California General Plan law requires each city and county to have land zoned to accommodate a fair share of the regional housing needs. The fair share is known as the Regional Housing Needs Allocation (RHNA). Fresno COG is the Lead Agency for developing the RHNA that includes Fresno County and the City of Clovis (City). Fresno COG's Policy Board adopted the 6th Cycle Final RHNA Plan for the Fresno County region following a public hearing, in November 2022; as such, local jurisdictions in Fresno County are required to update the Housing Element of their general plan to accommodate their RHNA numbers. The 6th Cycle RHNA covers the housing projection period from 2023–2031.[5]

Fresno Local Agency Formation Commission

The Fresno Local Agency Formation Commission (LAFCo) is responsible for coordinating orderly reorganization to local jurisdictional boundaries, including annexations. Any annexation of the SOI Expansion Area to the City is subject to LAFCo approval, and LAFCo would review proposed annexations for consistency with LAFCo's Annexation Policies and Procedures. A detailed evaluation of the proposed project's consistency with those policies is provided in the Impact LAND-2 discussion below.

Local

City of Clovis General Plan

General Plan Focus Area 13

Most of the SOI Expansion Area is located within General Plan Focus Area 13. A focus area assignment complements a property's General Plan land use designation and may expand permissible uses, introduce new policy requirements, augment development standards, or call attention to a complex property. The primary land use for Focus Area 13 is Urban Center, as indicated by the General Plan. A Master Plan is required, and development should give special consideration to buffering of residential adjacent to the focus area and design features for the focus area as a gateway to the City.[6]

Policies

The following policies of the General Plan related to land use and planning are applicable to the proposed project:

[5] Fresno Council of Governments (Fresno COG). 2022. Fresno Council Regional Housing Needs Allocation Plan. Website: https://www.fresnocog.org/project/fresno-county-regional-housing-needs-allocation-plan/. Accessed April 16, 2025.

[6] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Land Use Element

Policy 3.1 **Planning for the entire Urban Center.** Require a comprehensive design document (such as a master plan, specific plan, or design guidelines) for each Urban Center prior to authorizing new development. In addition to any statutory requirements, each document should provide direction on:

A. Consistency with the General Plan
B. Visual appearance
C. A mix of housing types, tenure options, and price points
D. Non-vehicular circulation within and connections to the remainder of Clovis and adjacent communities
E. Centralized public services, community park, open space, trails, and recreation facilities
F. Adequate provision of educational facilities

Policy 3.2 **Individual development project.** When projects are proposed in an Urban Center, require a conceptual master plan to show how a proposed project could relate to possible future development of adjacent and nearby properties. The conceptual master plan should generally cover about 160 acres or the adjacent area bounded by major arterials, canals, or other major geographical features. The conceptual master plan should address:

A. Compliance with the comprehensive design document (see Policy 3.1)
B. A consistent design theme
C. A mix of housing types
D. Adequate supply and distribution of neighborhood parks
E. Safe and direct pedestrian and bicycle linkages between residential areas and school sites, parks, and community activity centers

Policy 3.5 **Fiscal sustainability.** The City shall require establishment of community facility districts, lighting and landscaping maintenance districts, special districts, and other special funding or financing tools in conjunction with or as a condition of development, building or permit approval, or annexation or Sphere of Influence amendments when necessary to ensure that new development is fiscally neutral or beneficial.

Policy 3.6 **Mix of housing types and uses.** Development is encouraged to provide a mix of housing types, unit sizes, and densities at the block level. To accomplish this, individual projects five acres or larger may be developed at densities equivalent to one designation higher or lower than the assigned designation, provided that the density across an individual project remains consistent with the General Plan.

Policy 3.7 **Urban Village neighborhood concept.** Residential developments in Urban Centers must contribute to and become part of a neighborhood by incorporating a central

park feature, a school complex, a hierarchy of streets, pedestrian pathways, or other neighborhood amenities. Higher density residential should be next to lands designated Mixed Use Village. The City may also require the application of the urban village neighborhood concept in areas outside of an Urban Center.

Policy 3.8 **Land use compatibility.** Within Urban Center, new development that is immediately adjacent to properties designated for rural residential and agricultural uses shall bear the major responsibility of achieving land use compatibility and buffering.

Policy 3.9 **Connected development.** New development in Urban Centers must fully improve roadway, pedestrian and bicycle systems within and adjacent to the proposed project and connect to existing urbanized development.

Policy 4.1 **Clovis leadership.** The City shall take a leadership role in the land use planning for the Sphere of Influence and entire Clovis General Plan Area.

Policy 5.1 **Housing variety in developments.** The Clovis General Plan has been planned to provide a variety of housing product types suitable to each stage of a person's life. Each development should contribute to a diversity of housing sizes and types within the standards appropriate to the land use designation. This policy does not apply to projects smaller than five acres.

Policy 6.1 **Amendment criteria.** The City Council may approve amendments to the General Plan when the City Council is satisfied that the following conditions are met:

A. The proposed change is and will be fiscally neutral or positive.
B. The proposed change can be adequately served by public facilities and would not negatively impact service on existing development or the ability to service future development.
C. The proposed change is consistent with the Urban Village Neighborhood Concept when within an Urban Center.
D. General Plan amendments proposing a change from industrial, mixed-use business campus, or office (employment generating) land use designations to non employment-generating land use designation shall be accompanied by an analysis of the potential impacts on the change or loss in the types of jobs.
E. This policy does not apply to:
    i. County designations within the Clovis Planning Area or changes made by the City Council outside of the sphere boundary to reflect changes made by the County of Fresno.
    ii. Changes initiated by public agencies (such as school districts, flood control) for use by public agencies.
    iii. Changes initiated by the city within a specific plan.

Policy 6.2 **Smart Growth.** The City is committed to the following smart growth goals.

A. Create a range of housing opportunities and choices
B. Create walkable neighborhoods
C. Encourage community and stakeholder collaboration
D. Foster distinctive, attractive communities with a strong sense of place
E. Make development conditions predictable, fair and cost effective
F. Mix land uses
G. Preserve open space, farmland, natural beauty, and critical environmental areas
H. Provide a variety of transportation choices
I. Strengthen and direct development toward existing communities
J. Take advantage of compact building design
K. Enhance the economic vitality of the region
L. Support actions that encourage environmental resource management

Economic Development Element

Policy 1.2 **Jobs-housing ratio.** Improve the City's job-housing ratio by promoting growth in jobs suited to the skills and education of current and future residents with the objective of the number of jobs in Clovis being equal to the number of employed residents.

Policy 1.5 **Workforce housing.** Collaborate with residents, housing providers, and the development community to provide housing opportunities for the local workforce.

Policy 3.1 **Quality of life.** Promote retail development with the primary objective of improving the quality of life by providing a full range of goods and services in Clovis.

Policy 3.2 **Convenience goods and services.** Encourage business providing convenience goods and services to locate in retail centers in neighborhoods and communities throughout the City.

Policy 3.5 **Neighborhood-scale retail centers.** Require neighborhood-scale retail centers and districts to provide street furniture, shading, landscaping, pedestrian circulation, and gathering spaces that enhance the experience of shopping.

Housing Element

Policy H-1.1 **Housing Production Target.** Maintain an adequate supply of appropriately zoned land to support the production of at least 8,977 housing units in Clovis between 2023 and 2031 to accommodate the local and regional housing need.

Policy H-1.3 **Variety of Housing Types**. Facilitate development of a wide range of different housing types for people of all income levels to diversify the housing stock in Clovis neighborhoods and provide units for extremely low-, very low-, low-, and moderate-income and special needs households, including people with disabilities, senior citizens, and people in need of assisted, supportive, and/or transitional housing.

Policy H-1.4 **Distribute Housing Opportunities**. Distribute new housing, affordable and market rate, supportive housing, and special needs housing across all neighborhoods and increase the supply of affordable housing and special needs housing in highest opportunity areas and in neighborhoods that currently have fewer affordable housing units or special needs housing to affirmatively further fair housing.

Policy H-1.6 **Infrastructure Capacity and Priority.** Ensure the adequate provision of water, sewer, storm drainage, dry utilities, roads, public facilities, and other infrastructure necessary to serve new housing. Continue to provide priority sewer and water to lower-income housing units, consistent with Government Code Section 65589.7.

Policy H-2.6 **No Net Loss of Housing Stock**. Ensure that sites being redeveloped for housing do not result in a net reduction in housing units, consistent with Government Code Section 66300(d).

City of Clovis Municipal Code, Title 9–Development Code

The City's Development Code implements the policies of the General Plan and applicable specific plans by classifying and regulating the uses of land and structures within the City. The Development Code is adopted to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the City.[7]

3.11.4 - Methodology

Analysis in this section focuses on whether the proposed project would physically divide an established community and whether the proposed project would conflict with land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect. Conflicts and inconsistencies with a policy, in and of themselves, do not constitute significant environmental impacts for purposes of CEQA. Rather, it is only where (1) there is a conflict or inconsistency that (2) involves a policy that was adopted for the purpose of avoiding or mitigating an environmental effect, and (3) a conflict with such a policy results in a significant environmental impact. Environmental impacts that would result from the proposed project in other environmental topic areas are discussed throughout Chapter 3 of this Revised Draft EIR. The potential for land use impacts was assessed through review of applicable land use policy documents.

Cumulative Analysis

The geographic scope of the cumulative land use and planning analysis is the project vicinity. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to land use and planning. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact

[7] City of Clovis. 2025. Municipal Code, Title 9 – Development Code: Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis09.html. Accessed April 16, 2025.

associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.11.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to land use and planning are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

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.

3.11.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Divide an Established Community

Impact LAND-1: The proposed project would not physically divide an established community.

Impact Analysis

The physical division of an established community would occur if the proposed project would result in construction of large linear features, such as a railroad or interstate highway, or if it would involve removal of access that would impact mobility within an existing community, such as removal of a bridge.

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Thus, the proposed SOI Expansion and Non-development Area would not physically divide an established community. Therefore, no impacts would occur.

MP Area 2

MP Area 2 is located directly north of the city limits and is adjacent primarily to undeveloped agricultural land, rural residential land, and low-density residential uses. The Master Plan Area would result in an extension of developed uses within an area of the City that currently has approved development plans within the vicinity of the Master Plan Area. The proposed Master Plan would

provide roadways and pedestrian pathways to connect the Master Plan Area to the existing circulation system and to allow access to and from the SOI Expansion Area. Implementation of the Master Plan would not result in physical barriers, such as a highway, wall, or other division that would divide an existing community, but would serve as an orderly extension of existing and planned developments. Therefore, impacts would be less than significant with regard to the physical division of an established community, and no mitigation measures are required.

Vista Ranch Development/MP Area 1

Construction

Impacts related to physical division of an established community are limited to operational impacts. No respective construction impacts would occur.

Operation

The Vista Ranch Development would not involve construction of any type of linear feature that would impair mobility within an existing community, nor would it remove a means of access in a manner that would impede travel or otherwise constitute division of an established community. Rather, the proposed Vista Ranch Development would provide roadways and pedestrian pathways to connect the Master Plan Area to the existing circulation system and to allow access to and from the SOI Expansion Area. Therefore, impacts would be less than significant with regard to the physical division of an established community and no mitigation measures are required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic context for this impact is the project vicinity. According to Chapter 3, Environmental Impact Analysis, Table 3-1, Cumulative Projects, seven development projects are located within the vicinity of the proposed Master Plan. The physical division of an established community typically applies to projects that establish linear features, such as highways and railroads that would physically divide two or more connected parts of an established community by creating a barrier. However, implementation of General Plan Policies and Actions for planning and implementation and conformance with mandatory ordinances and policies would substantially limit or preclude land use

conflicts. In addition, compliance with the City's standards and regulations contained in the CMC would further limit land use conflicts between established and future uses.

Although there are seven other cumulative projects within the proposed Master Plan's vicinity, these development projects do not consist of major expansion projects, such as roadways, highways, or railroads, that could physically divide an established community. In addition, these cumulative projects are confined to already established parcels of land. Moreover, the proposed Master Plan would provide roadways and pedestrian pathways to connect the Master Plan Area to the existing circulation system and to allow access to and from the site. Implementation of the Master Plan would not result in physical development that could divide an established community; rather, it would facilitate an orderly extension of existing and planned developments. Therefore, the Master Plan would not result in a cumulatively considerable contribution to any cumulative impact regarding the potential division of an established community. Given the above information, the proposed Master Plan, in conjunction with other existing, planned, and probable future projects, would result in a less than significant cumulative impact.

Vista Ranch Development/ MP Area 1

As discussed above, seven development projects are located within the proposed project's vicinity. The physical division of an established community typically applies to projects that establish linear features such as highways and railroads that would physically divide two or more connected parts of an established community through creating a barrier. However, implementation of General Plan Policies and Actions for planning and implementation and conformance with mandatory ordinances and policies would substantially limit or preclude land use conflicts. In addition, compliance with the City's standards and regulations contained in the CMC would further limit land use conflicts between established and future uses.

Although there are seven other cumulative projects within the proposed Vista Ranch Development's vicinity, these development projects do not consist of major expansion projects, such as roadways, highways, or railroads, that could physically divide an established community. In addition, these cumulative projects are confined to already established parcels of land. Moreover, the proposed Vista Ranch Development would provide roadways and pedestrian pathways to connect MP Area 1 to the existing circulation system and to allow access to and from the site. The Vista Ranch Development would not result in physical barriers, such as a highway, wall, or other division, that would divide an existing community, but would serve as an orderly extension of existing and planned developments, and would not result in a cumulatively considerable contribution to any cumulative impact regarding the potential division of an established community. Given the above information, the proposed Vista Ranch Development, in conjunction with other existing, planned, and probable future projects, would result in a less than significant cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Conflict with Applicable Plans, Policies, or Regulations

Impact LAND-2: The proposed project would not 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.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only that would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the proposed SOI Expansion and Non-development Area would not 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. As such, no impact would occur.

Master Plan and MP Area 2

City of Clovis General Plan

When land uses are not consistent with a General Plan, there are two courses of action: (1) the uses are not allowed given the inconsistency, or (2) the land uses are changed through an amendment to the General Plan to create consistency. The proposed Master Plan would require a General Plan Land Use Amendment to adjust the land use designation to Mixed Use Village for the Development Area to accommodate the proposed development density. The proposed modification to the original boundaries of Focus Area 13 would memorialize the 507-acre Master Plan Area as a subarea of Focus Area 13 (Focus Area 13a). Approval of the General Plan Amendment would ensure that the proposed Master Plan would be substantially consistent with the General Plan's land use requirements.

Since general plans often contain numerous policies emphasizing differing legislative goals, a development project may be "consistent" with a general plan, taken as a whole, even though the project appears to be inconsistent or arguably inconsistent with some individual policies. As demonstrated in Table 3.11-1 below, the Master Plan is consistent with the key land use issues and development concepts of the General Plan, which provide for logical growth of the City, emphasize community form, scale, and identity, encourage attractive, sustainable neighborhoods, support public transit and bicycle and pedestrian circulation, encourage housing opportunity, promote employment and economic development, encourage a mix of land uses that balance public services and fiscal sustainability, and promote access to open space. The Master Plan Area is located adjacent to the City's SOI and current city limits and would provide for housing, employment, educational, and recreational opportunities.

Additionally, the proposed Master Plan is consistent with the applicable General Plan policies, which aim to avoid or mitigate an environmental effect. As shown in Table 3.11-1, the Master Plan is consistent with the City's existing General Plan policies and would not conflict with policies adopted to avoid or mitigate an environmental effect.

Table 3.11-1: General Plan Policy Consistency

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	**Text**		
Land Use Element			
LU Policy 3.1	Planning for the entire Urban Center. Require a comprehensive design document (such as a master plan, specific plan, or design guidelines) for each Urban Center prior to authorizing new development. In addition to any statutory requirements, each document should provide direction on: A. Consistency with the General Plan B. Visual appearance C. A mix of housing types, tenure options, and price points D. Non-vehicular circulation within and connections to the remainder of Clovis and adjacent communities E. Centralized public services, community park, open space, trails, and recreation facilities F. Adequate provision of educational facilities.	**Consistent.** Implementation of a Master Plan would be consistent with this policy. Much of the Master Plan Area is within the City's Northeast Urban Center (NEUC), which is designated for planned growth. While the proposed land uses are not identical to what was proposed in the General Plan, they are similarly a mixture of commercial, residential, public uses, and mixed uses. The Master Plan includes zoning for housing types at various densities. Furthermore, the Master Plan proposes multipurpose trails and bike lanes. It proposes designation of several areas for public parks, open space, recreation, trails, and a school.	**Consistent.** The Vista Ranch Development includes a mixture of medium-density, medium high-density, and very high-density residential units, commercial uses, recreation, parks, and a mini-storage development. Bike lanes are proposed along major roadways.
LU Policy 3.2	When projects are proposed in an Urban Center, require a conceptual master plan to show how a proposed project could relate to possible future development of adjacent and nearby properties. The conceptual master plan should generally cover about 160 acres or the adjacent area bounded by	**Consistent.** Future implementation of the proposed Master Plan would result in individual developments within the Urban Center, in compliance with the Master Plan prepared in accordance with all applicable City requirements, in order for decision-makers to consider project-related impacts on nearby properties in the	**Consistent.** The Vista Ranch Development would comply with the proposed Master Plan, which meets the qualifications required in this policy.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
	major arterials, canals, or other major geographical features. The conceptual master plan should address: A. Compliance with the comprehensive design document (see Policy 3.1) B. A consistent design theme C. A mix of housing types D. Adequate supply and distribution of neighborhood parks E. Safe and direct pedestrian and bicycle linkages between residential areas and school sites, parks, and community activity centers	surrounding area. Review of these future development projects would include compliance with applicable design guidelines, demonstrating design themes, housing typologies, parks and open space, and considering pedestrian and bicycle amenities in the community. A. The Master Plan would include the requisite components to demonstrate consistency by providing comprehensive design guidelines. B. The Master Plan provides standards for a consistent design theme and depictions of architectural theme for the proposed project. C. The Master Plan includes a mix of housing types, including Low-Density Residential, Medium-Density Residential, Medium High Density Residential and Very High-Density Residential. D. The Master Plan would include a variety of open space, trail, and parks interspersed throughout the Master Plan Area. E. The Master Plan includes planned pedestrian pathways, bicycle paths and linkages to proposed residential areas, school sites, parks, and community activity areas. As compliance with these provisions would be required for all new future developments with the Urban Center, the proposed project would be consistent with this policy.	

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
LU Policy 3.5	The City shall require establishment of community facility districts, lighting and landscaping maintenance districts, special districts, and other special funding or financing tools in conjunction with or as a condition of development, building or permit approval, or annexation or Sphere of Influence amendments when necessary to ensure that new development is fiscally neutral or beneficial.	**Consistent.** Future developments consistent with the Master Plan would be required to pay all applicable public services fees to fund city facilities.	**Consistent.** The proposed Vista Ranch Development would be required to pay all applicable public services fees to fund public facilities.
LU Policy 3.6	Development is encouraged to provide a mix of housing types, unit sizes, and densities at the block level. To accomplish this, individual projects five acres or larger may be developed at densities equivalent to one designation higher or lower than the assigned designation, provided that the density across an individual project remains consistent with the General Plan.	**Consistent.** The Master Plan proposes land uses that could result in the construction of up to 3,286 new residential units, which would be provided in variety of housing mixes, including different types, styles, and densities, as further illustrated in the Master Plan.	**Consistent.** The Vista Ranch Development includes a mixture of medium-density, medium high-density, and very high-density residential units.
LU Policy 3.7	Residential developments in Urban Centers must contribute to and become part of a neighborhood by incorporating a central park feature, a school complex, a hierarchy of streets, pedestrian pathways, or other neighborhood amenities. Higher density residential should be next to lands designated Mixed Use Village. The City may also require the application of the	**Consistent.** The Master Plan proposes uses consistent with the requirements of Urban Center development. Proposed land uses would allow for 59 acres of parks, trails, and preserved open space areas, a 19-acre elementary school, and pedestrian and neighborhood amenities, in addition to the residential units. As the Master Plan proposes to create a new Mixed Use Village designation, future development would be required to comply with	**Consistent.** The Vista Ranch Development proposes a complete neighborhood with mixed uses, including medium-, medium high-, and very high-density residential units, mixed uses including community recreation center and Gateway neighborhood commercial, internal connections, a trail system, and multiple public parks.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
	urban village neighborhood concept in areas outside of an Urban Center.	density and siting requirements in each respective area.	
LU Policy 3.8	Within Urban Center, new development that is immediately adjacent to properties designated for rural residential and agricultural uses shall bear the major responsibility of achieving land use compatibility and buffering.	**Consistent.** The Master Plan would comply with City requirements related to development within the Urban Center, specifically as related to properties adjacent to R-R, AL, and AE land uses. Future development resulting from Master Plan implementation would be designed with consideration for compatibility and buffering, as illustrated in the Master Development Plan.	**Consistent.** The Vista Ranch Development proposes medium- to medium high-density residential uses adjacent to designated agriculture uses and medium-density residential next to rural residential with landscape areas included in areas with nearby rural residential homes.
LU Policy 3.9	New development in Urban Centers must fully improve roadway, pedestrian and bicycle systems within and adjacent to the proposed project and connect to existing urbanized development.	**Consistent.** The Master Plan would comply with City requirements for new development within designated Urban Centers as roadway, pedestrian, and bicycle facility improvements would be included in future implementation.	**Consistent.** The Vista Ranch Development includes its own roadway network with sidewalks and bike lanes along the major roadways. It also includes an extensive trail system to provide neighborhood connectivity.
LU Policy 5.1	The Clovis General Plan has been planned to provide a variety of housing product types suitable to each stage of a person's life. Each development should contribute to a diversity of housing sizes and types within the standards appropriate to the land use designation. This policy does not apply to projects smaller than five acres.	**Consistent.** The Master Plan proposes land uses that would accommodate a variety of housing types, sizes, and densities to provide suitable housing for varying income levels and demographics.	**Consistent.** The Vista Ranch Development proposes medium-, medium high-, and very high-density residential uses to provide suitable housing for varying income levels and demographics.
LU Policy 6.1	The City Council may approve amendments to the General Plan when the City Council is satisfied that the following conditions are met:	**Consistent.** See LU Policy 3.5 and LU Policy 3.7. The Master Plan designates land for parks and schools, and the nearest fire station is located 1.55 miles south of the Sphere of Influence (SOI) Expansion Area. Similar to the existing land use	**Consistent.** See LU Policy 3.5 and LU Policy 3.7. The Vista Ranch Development proposes the development of parks and open space, and the nearest fire station is located 1.55 miles south of the SOI Expansion Area. Similar to the existing

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
	A. The proposed change is and will be fiscally neutral or positive. B. The proposed change can be adequately served by public facilities and would not negatively impact service on existing development or the ability to service future development. C. The proposed change is consistent with the Urban Village Neighborhood Concept when within an Urban Center. D. General Plan amendments proposing a change from industrial, mixed-use business campus, or office (employment generating) land use designations to non employment-generating land use designation shall be accompanied by an analysis of the potential impacts on the change or loss in the types of jobs. E. This policy does not apply to: i. County designations within the Clovis Planning Area or changes made by the City Council outside of the sphere boundary to reflect changes made by the County of Fresno. ii. Changes initiated by public agencies (such as school districts, flood control) for use by public agencies.	designations, the Master Plan designates areas for commercial, light industrial, and a school, uses which would generate employment opportunities.	land use designations, the Vista Ranch Development proposes commercial and community recreation development, which would generate employment opportunities.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
	iii. Changes initiated by the city within a specific plan.		
LU Policy 6.2	The City is committed to the following smart growth goals. A. Create a range of housing opportunities and choices B. Create walkable neighborhoods C. Encourage community and stakeholder collaboration D. Foster distinctive, attractive communities with a strong sense of place E. Make development conditions predictable, fair and cost effective F. Mix land uses G. Preserve open space, farmland, natural beauty, and critical environmental areas H. Provide a variety of transportation choices I. Strengthen and direct development toward existing communities J. Take advantage of compact building design K. Enhance the economic vitality of the region L. Support actions that encourage environmental resource management	**Consistent:** The Master Plan would be consistent with the Smart Growth goals. A. It would provide a range of housing opportunities and choices from low-density residential to very high-density residential. B. It proposes roadways and walkable neighborhoods with connectivity via a network of trails to amenities including a school, commercial and community recreation. C. It has implemented community and stakeholder information in the proposed project, including General Plan, Parks Master Plan, and Active Transportation Plan comments. D. Development would comply with all City standards for building height, massing, orientation, landscaping, and exterior lighting standards. E. It would memorialize the development of the community. F. It would include a mix of residential, nonresidential, and open space uses throughout the community. G. It would preserve critical environmental areas throughout the community, including corridor adjacent to Big Dry Creek Reservoir and the Big Dry Creek Reservoir Outlet Works Channel and adjacent tailwater pond.	**Consistent:** The proposed Vista Ranch Development would be consistent with the Smart Growth goals. A. It would construct a range of housing opportunities and choices from medium-density residential to very high-density residential. B. It proposes roadways and walkable neighborhoods with connectivity via a network of trails to amenities including commercial areas and community recreation areas. C. It has implemented community and stakeholder information in the proposed project, including General Plan, Parks Master Plan, and Active Transportation Plan comments. D. Development would be required to comply with all City standards for building height, massing, orientation, landscaping, and exterior lighting standards. E. The Master Plan would memorialize the development of the community. F. It would construct a mix of residential, commercial, recreational, parks, and open space uses throughout the community G. It would preserve critical environmental areas throughout the community, including corridor adjacent to Big Dry Creek Reservoir and the Big Dry Creek Reservoir Outlet Works Channel and adjacent tailwater pond. It would also

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
		H. It would provide a multitude of alternative transportation choices including pedestrian paths and a multitude of bicycle paths. The Master Plan has also taken into account extension of transit routes and would provide transit stops within the community. I. It is adjacent to the city limits and adjacent to both wet utilities and dry utilities that would service development under the Master Plan. J. It incorporates compact building design. K. It would increase local property values, create temporary and permanent employment for the area and provide sales tax-generating business.	preserve approximately 28.23 acres of preserved open space. H. It would provide a multitude of alternative transportation choices including pedestrian paths and a multitude of bicycle paths Class I and II. I. It is adjacent to the city limits and adjacent to both wet utilities and dry utilities that would service development under the Master Plan. J. It incorporates compact building design. K. It would increase local property values, create temporary and permanent employment for the area, and provide sales tax-generating business.
Circulation Element			
CIR Policy 1.1	The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.	**Consistent.** The Master Plan would develop a circulation system that includes sidewalks, bike lanes, trails, and roadways that link activities, recreational amenities, local commercial uses, and residential uses. New infrastructure would meet City standards and would be integrated within existing and planned facilities and connections.	**Consistent.** The Vista Ranch Development would construct new public and private roadways, including sidewalks, with bike lanes along major roadways. It would also include an extensive trail system. New infrastructure would meet City standards and would be integrated within existing and planned facilities and connections.
CIR Policy 1.2	Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.	**Consistent.** See CIR Policy 1.1.	**Consistent.** See CIR Policy 1.1.
CIR Policy 1.3	The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.	**Consistent.** See CIR Policy 1.1.	**Consistent.** See CIR Policy 1.1.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
CIR Policy 1.5	The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).	**Consistent.** See CIR Policy 1.1. Sunnyside Avenue, Shepherd Avenue, Behymer Avenue, and Temperance Avenue are the main roadways providing access to the Master Plan Area.	**Consistent.** See CIR Policy 1.1. Shepherd Avenue, Behymer Avenue, and Temperance Avenue are the main roadways providing access to MP Area 1. The Vista Ranch Development would provide connectivity to existing City infrastructure, such as roads, sidewalks, trails, and Class I and II bicycle paths.
CIR Policy 1.6	New development shall utilize a grid or modified grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.	**Consistent.** Development under the Master Plan would utilize the grid or modified grid street pattern. Block lengths would be compliant with this policy.	**Consistent.** The proposed Vista Ranch Development would utilize the grid street pattern. Block lengths would be compliant with this policy.
CIR Policy 1.8	New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.	**Consistent.** The proposed Shepherd Avenue access modification includes a relocated vehicular access point along the limited access designation of Shepherd Avenue adjacent to the proposed Focus Area 13a. As described in Appendix K, current City policy is to allow permanent street access points at the 0.5-mile points along this portion of Shepherd Avenue. While an intersection access does occur at Armstrong Avenue, the Shenandoah Farms residential development (approved in the County of Fresno) precludes any extension of Armstrong Avenue to the north. The proposed Shepherd Avenue access modification would move what would have been an allowable access point approximately 500 feet to the east, creating a non-signalized “right-in, right-out, left-in” ingress and egress on the north side of	**Consistent.** The proposed Shepherd Avenue access modification includes a relocated vehicular access point along the limited access designation of Shepherd Avenue adjacent to the proposed Focus Area 13a. Roadways proposed as part of the Vista Ranch Development would connect to existing streets, where applicable.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
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		Shepherd Avenue. This configuration would interface appropriately with the currently existing Armstrong/Shepherd Avenue intersection. The proposed Circulation Element modifications may include an amendment to the General Plan by proposing to add major street route designations within Focus Area 13a. Focus Area 13a, as requested to be modified, abuts Shepherd Avenue, a designated Expressway, along its southern boundary, which includes three significant intersections: Armstrong Avenue, designated as a local street; Temperance Avenue, designated as an Arterial; and Locan Avenue, designated as a collector. While Armstrong Avenue's extension to the north is impeded by the Shenandoah Farms residential development (approved in the County of Fresno), the Temperance Avenue and Locan Avenue intersections provide access points to the proposed Master Plan Area. Given the traffic lane geometrics of these pre-existing intersections, as well as the traffic load generated by the proposed Master Plan, major street designations are being proposed and are requested to be added to the Circulation Element of the General Plan.	
CIR Policy 2.3	New development shall pay its fair share of the cost for circulation improvements in accordance with the City's traffic fee mitigation program.	**Consistent.** Development implementing the Master Plan would pay its fair share of required costs for circulation improvements, in compliance with all applicable City regulations.	**Consistent.** The proposed Vista Ranch Development would pay its fair share of required costs for circulation improvements, in compliance with all applicable City regulations.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
CIR Policy 3.1	Employ traffic calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.	**Consistent.** The neighborhoods within the Master Plan would include a network of public and private residential streets to provide an efficient flow of traffic and pedestrian mobility through the Master Plan Area. Pedestrian, bicycle, and trail improvements are expected to calm traffic due to increased reliance on alternative transit methods. Should other traffic calming measures be warranted, the Master Plan would comply with all applicable City design requirements.	**Consistent.** The Vista Ranch Development would include a network of public and private residential streets to provide an efficient flow of traffic and pedestrian mobility through MP Area 1. Pedestrian, bicycle, and trail improvements are expected to calm traffic due to increased reliance on alternative transit methods.
CIR Policy 3.12	Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets and encourage pedestrian and bicycle access.	**Consistent.** Residential development within the Master Plan Area would generally face more local streets.	**Consistent.** As shown in Exhibit 3.16-1, residential development within MP Area 1 generally faces local and collector streets.
CIR Policy 5.2	Require development to fund and construct facilities as shown in the Bicycle Transportation Plan when facilities are in or adjacent to the development.	**Consistent.** Modifications to the Circulation Element are proposed, adding and connecting multipurpose trails and bike lanes with the Development Area to integrate with the current City trail and bike system. Should funding for bike facilities be warranted, the Master Plan would comply with all applicable City requirements**.**	**Consistent.** Multiple bike lanes are proposed as part of the Vista Ranch Development.
CIR Policy 5.3	Encourage pathways and other pedestrian amenities in Urban Centers and new development 10 acres or larger.	**Consistent.** The Master Plan includes an extensive trail circulation system, as well as sidewalks along all proposed streets.	**Consistent.** The Vista Ranch Development includes an extensive trail circulation system, as well as sidewalks along all proposed public streets.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
Public Facilities and Services Element			
PFS Policy 1.1	New development. New development shall pay its fair share of public facility and infrastructure improvements.	**Consistent.** Development implementing the Master Plan would be required to pay the police facility fee, the community facility fee which covers fire facilities, the school impact fee, development impact fees, library fees, and parkland fees in accordance with the City of Clovis Municipal Code (CMC) Chapters 4.10 and 4.11 as well as Education Code § 17620 and Government Code § 65995.	**Consistent.** Residential and commercial uses proposed as part of the Vista Ranch Development would be required to pay the police facility fee, the community facility fee which covers fire facilities, the school impact fee, development impact fees, library fees, and parkland fees in accordance with CMC Chapters 4.10 and 4.11 as well as Education Code § 17620 and Government Code § 65995.
PFS Policy 1.2	Require that new development demonstrate contractual and actual sustainable water supplies adequate for the new development's demands.	**Consistent.** The Master Plan would be served by a new connection to the City's potable and nonpotable water distribution system. The proposed water system would be located within proposed public utilities easements and connected to existing City main lines. As described in Section 3.17, Utilities and Service Systems, water supplies would be sufficient to serve development under the proposed Master Plan.	**Consistent.** As described in Section 3.17, Utilities and Service Systems, water supplies would be sufficient to serve the Vista Ranch Development.
PFS Policy 1.3	Prior to annexation, the city must find that adequate water supply and service and wastewater treatment and disposal capacity can be provided for the proposed annexation. Existing water supplies must remain with the land and be transferred to the City upon annexation approval.	**Consistent.** As described in Section 3.17, Utilities and Service Systems, the Water Supply Assessment prepared by Provost and Pritchard in March 2024 and revised in September 2025 concluded that there are adequate water supplies to serve development under the Master Plan. The Wastewater Hydraulic Modeling Study prepared by Akel Engineering in September 2025 concluded that the existing collection system is adequately sized to accommodate the proposed project.	**Consistent.** As described in Section 3.17, Utilities and Service Systems, the Water Supply Assessment prepared by Provost and Pritchard in March 2024 and revised in September 2025 concluded that there are adequate water supplies to serve development under the Master Plan, which includes the Vista Ranch Development. The Wastewater Hydraulic Modeling Study prepared by Akel Engineering in September 2025 concluded that the existing collection system is adequately

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
			sized to accommodate the Vista Ranch Development.
PFS Policy 2.2	Waste diversion rate. Meet the State's current and future waste diversion goals through the city's recycling and diversion programs.	**Consistent.** Future development resulting from implementation of the proposed Master Plan would be required to comply with solid waste diversion requirements.	**Consistent.** The Vista Ranch Development would be required to participate in the City's recycling and diversion programs.
PFS Policy 3.2	Coordinate with the school districts to locate primary school facilities to maximize access, walkability, and safety while minimizing impacts to surrounding neighborhoods. Continue to foster the campus approach when siting secondary schools.	**Consistent.** See Policies CIR 1.1 through CIR 1.3 and CIR 1.5.	**Consistent.** See Policies CIR 1.1 through CIR 1.3 and CIR 1.5.
Environmental Safety Element			
ES Policy 3.2	Discourage land use and traffic patterns that would expose sensitive land uses or noise-sensitive areas to unacceptable noise levels.	**Consistent.** Fowler Avenue, Shepherd Avenue, Behymer Avenue, and Temperance Avenue are the main roadways providing access to the Master Plan Area. Shepherd Avenue only borders the south end of the Master Plan Area. An open space trail buffer is provided adjacent to Shepherd Avenue. Temperance Avenue transitions into a smaller street once it reaches the Master Plan Area. Behymer Avenue makes up the northern border of the Master Plan and provides access to the west. Fowler Avenue connects to Behymer Avenue in the northwest and provides access to the south. The circulation network within the Master Plan would be compatible with residential uses. The Master Plan	**Consistent.** Shepherd Avenue, Behymer Avenue, and Temperance Avenue are the main expressway/arterial/collector roadways providing access to the Vista Ranch Development. Shepherd Avenue only borders the south end of the Master Plan Area. An open space trail buffer is provided adjacent to Shepherd Avenue. Temperance Avenue transitions into a smaller street once it reaches the residential portion after the roundabout. Behymer Avenue makes up the northern border of the Master Plan and provides access to the west. The circulation network would be compatible with residential uses. It includes complementary proposed uses, including

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		Area includes complementary proposed uses, including residential, open space, a school, and park space. A mini-storage is included in the southeast portion of the SOI Expansion Area. However, this is an already-operational storage facility, which is not expected to generate a high level of noise.	residential, open space, walkable community recreation uses and neighborhood commercial, and park space.
ES Policy 3.3	When new residential development is proposed adjacent to land designated for industrial or commercial uses, require the proposed development to assess potential noise impacts and fund feasible noise-related mitigation measures.	**Consistent.** The Master Plan proposes to develop new residential uses adjacent to light industrial and commercial uses. Chapter 3.12, Noise, evaluates potential noise impacts, including noise impacts on sensitive receptors, and includes Mitigation Measure (MM) NOI-1a for construction mitigation, MM NOI-1b for stationary noise reduction, and MM NOI-2 for construction vibration mitigation.	**Consistent.** The Vista Ranch Development proposes new residential uses adjacent to industrial and commercial uses. Chapter 3.12, Noise, evaluates potential noise impacts, including noise impacts on sensitive receptors, and includes MM NOI-1a for construction mitigation, MM NOI-1b for stationary noise reduction, and MM NOI-2 for construction vibration mitigation.
ES Policy 3.4	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.	**Consistent.** Chapter 3.12 of this Revised Draft EIR, Noise, includes an acoustical analysis, which determined that potential noise impacts resulting from future Master Plan implementation would be less than significant with mitigation incorporated.	**Consistent.** Chapter 3.12 of this Revised Draft EIR, Noise, includes a project-level acoustical analysis that determines that impacts would be less than significant with mitigation incorporated.
ES Policy 3.5	Minimize noise impacts by requiring appropriate site, circulation, equipment, and building design, and sound walls, landscaping, and other buffers.	**Consistent**. Development implementing the Master Plan would be subject to mitigation identified for the plan as conditions of approval. MM NOI-1a requires a construction noise mitigation plan and MM NOI-1b requires a stationary source noise reduction plan for all future projects under the Master Plan. MM NOI-2 requires measures to reduce vibration levels during construction activities where vibration	**Consistent.** MM NOI-1a requires a construction noise mitigation plan. MM NOI-2 requires measures to reduce vibration levels during construction activities. The Vista Ranch Development includes landscaping and open space buffers throughout .

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
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		levels from construction activities of future projects would exceed 0.2 inch per second. Any additional appropriate mitigation measures to reduce noise impacts would be incorporated as design features and incorporated into future development on a project-by-project basis, as appropriate, and as required by the City. Master Plan design features give special consideration to future development, including buffering of residential uses adjacent to the Focus area. If required, mitigation measures would be incorporated into future development projects.	
Open Space and Conservation Element			
OSC Policy 1.1	Provide a minimum of 4 acres of public parkland for every 1,000 residents.	**Consistent.** The Master Plan is estimated to result in approximately 9,333 new residents, based on the maximum amount of residential development. As such, a total of approximately 37.3 acres of parkland would be required to accommodate new residents. The Master Plan proposes to include approximately 59 acres of parks, trails, and preserved open space within the Master Plan Area. Additionally, CMC Chapter 3.4, Park Acquisition and Development, states that developers who plan for dwelling units must pay a fee that is used to fund acquisition, improvement, and expansion of public parks and recreation facilities. Development within the Master Plan Area would require payment of the applicable fees in accordance with the CMC.	**Consistent.** The Vista Ranch Development is expected to result in approximately 7,556 new residents. As such, a total of 30.22 acres of parkland would be required to accommodate new residents. It would include open space, such as parks, trails, and preserved open space. Further, it would propose payment of park impact fees according to CMC Chapters 3.04 and 3.10.

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
No.	Text		
		Based on this, the Master Plan would be consistent with this policy.	
OSC Policy 1.3	Provide a variety of parks and recreation facilities in underserved and growing areas of the community.	**Consistent.** The Master Plan proposes to include 59 acres of parks, trails, and preserved open space within it. While much of the existing SOI Expansion Area is undeveloped, it is not available for public enjoyment as parkland. The medium high-density gated neighborhoods would provide small parks or small community pools to those neighborhoods.	**Consistent.** There are 59 acres of parks, trails, and open space within the Master Plan Area. Most of these amenities are also within MP Area 1.
OSC Policy 2.3	Maintain public views of open spaces, parks, and natural features. Enhance views along roadways and trails. Preserve Clovis' viewshed of the surrounding foothills and orient new development to capitalize on views of the Sierra Nevada.	**Consistent.** One of the proposed project's objectives is to embrace nature resources and views of the Sierra Nevada. The Master Plan would include approximately 59 acres of parks, trails, and open space.	**Consistent.** The proposed Vista Ranch Development would include many parks, trails, and open spaces. Development would be residential and tall buildings that would severely restrict views of the Sierra Nevada are not proposed.
OSC Policy 3.1	Encourage the use of low impact development techniques that retain or mimic natural features for stormwater management.	**Consistent.** The Master Plan would include construction of a new storm drainage system, which would incorporate Low Impact Development (LID) techniques, such as bioretention areas.	**Consistent.** The Vista Ranch Development would include a new storm drainage system, which would incorporate LID techniques, including but not limited to bioretention areas.
OSC Policy 3.2	Stormwater pollution. Minimize the use of non-point source pollutants and stormwater runoff.	**Consistent.** Development implementing the Master Plan is required to implement a Stormwater Pollution Prevention Plan (SWPPP) as part of its Construction General Permit to reduce construction-related polluted runoff. Bioretention areas are proposed, which would allow for stormwater infiltration into the soil to prevent erosion and siltation.	**Consistent.** The Vista Ranch Development is required to implement a SWPPP as part of its Construction General Permit to reduce construction-related polluted runoff. The proposed project would include bioretention areas, which would allow for stormwater infiltration into the soil to prevent erosion and siltation and reduce stormwater pollution.

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OSC Policy 3.3	Prohibit the use of new private wells in new development.	**Consistent:** Development implementing the proposed Master Plan would connect to existing municipal water conveyance and does not propose to include new private/public wells for the use of groundwater beneath the Master Plan Area.	**Consistent:** The proposed Vista Ranch Development would connect to existing municipal water conveyance and does not propose to include new private/public wells for the use of groundwater beneath the Master Plan Area.
OSC Policy 3.4	Promote water conservation through the use of drought-tolerant landscaping on existing and new residential properties. Require drought-tolerant landscaping for all new commercial and industrial development and city-maintained landscaping, unless used for recreation purposes.	**Consistent.** The proposed Master Plan would include extensive new landscaping and greenspace, all of which would be subject to the City's Water Efficient Landscape Requirements set forth in the CMC. Public landscape shall use nonpotable water.	**Consistent.** The proposed Vista Ranch Development would include extensive new landscaping and greenspace, all of which would be subject to the City's Water Efficient Landscape Requirements set forth in the CMC. Public landscape shall use nonpotable water.
OSC Policy 3.5	Encourage new development and substantial rehabilitation projects to exceed energy and water conservation and reduction standards set in the California Building Code.	**Consistent.** The proposed Master Plan would be designed and developed in accordance with California Green Buildings Code (CALGreen), including provisions for energy efficiency and water conservation reduction standards. It would also be subject to the City's Water Efficient Landscape Requirements set forth in the CMC.	**Consistent.** The proposed Vista Ranch Development would be designed and developed in accordance with CALGreen, including provisions for energy efficiency and water conservation reduction standards. It would also be subject to the City's Water Efficient Landscape Requirements set forth in the CMC.
OSC Policy 3.6	Promote the use of renewable and sustainable energy sources to serve public and private sector development.	**Consistent.** The proposed Master Plan would be designed and developed in accordance with CALGreen, including provisions for energy efficiency and water conservation reduction standards, thereby promoting the use of renewable and sustainable energy sources.	**Consistent.** The proposed Vista Ranch Development would be designed and developed in accordance with CALGreen, including provisions for energy efficiency and water conservation reduction standards, thereby promoting the use of renewable and sustainable energy sources.

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OSC Policy 3.7	Encourage new construction to incorporate energy-efficient building and site design strategies.	**Consistent.** The proposed Master Plan would be designed and developed in accordance with CALGreen, including provisions for energy efficiency and water conservation reduction standards. Additional development within the Master Plan Area would be required to conduct project-specific CEQA review, which would further ensure energy-efficient building and site design strategies would be implemented.	**Consistent.** The proposed Vista Ranch Development would be designed and developed in accordance with CALGreen, including water efficient landscaping, cool roof materials, and the installation of solar panels. It would also be all-electric in design and would not rely on natural gas.
Air Quality Element			
AQ Policy 1.1	Reduce greenhouse gas and other local pollutant emissions through mixed use and transit-oriented development and well designed transit, pedestrian, and bicycle systems.	**Consistent.** The Master Plan includes well designed pedestrian and bicycle systems. Furthermore, it includes commercial, residential, recreational, and school uses within walking and biking distance. These features would help reduce mobile greenhouse gas emissions by reducing VMT. Transit stops are incorporated into the Master Plan design to facilitate future bus route extensions.	**Consistent.** The Vista Ranch Development includes well designed pedestrian and bicycle systems. Furthermore, it includes recreational, residential, and commercial uses within walking and biking distance of each other. These features would help reduce mobile greenhouse gas emissions by reducing VMT. Transit stops are incorporated into the Master Plan design to facilitate future bus route extensions.
AQ Policy 1.2	Prohibit, without sufficient mitigation, the future siting of sensitive land uses within the distances of emission sources as defined by the California Air Resources Board.	**Consistent.** Residences and a school are proposed as part of the Master Plan, which are considered traditional sensitive receptors. However, the residences would not be located within 500 feet of a freeway or high-traffic road. The Master Plan also does not propose any large stationary emissions sources and is not located nearby large stationary emissions sources. Additional sensitive land uses sited within the Master Plan Area would be required to conduct	**Consistent.** Residences are proposed as part of the Vista Ranch Development, which are considered traditional sensitive receptors. However, the residences would not be located within 500 feet of a freeway or high-traffic road. As noted in Section 3.3, Air Quality, the Vista Ranch Development is not anticipated to expose sensitive receptors to construction and operational emissions, including increased cancer risk and toxic air contaminants (TAC) or diesel particulate

Goal/Objective/Policy		Master Plan and MP Area 2 Consistency Determination	Vista Ranch Development/MP Area 1 Consistency Determination
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		project-specific CEQA review which would further ensure these land uses are not within distances of emission sources without sufficient mitigation.	matter (DPM) emissions. The Master Plan also does not propose any large stationary emissions sources and is not located nearby large stationary emissions sources.
AQ Policy 1.3	Encourage the use of best management practices during construction activities to reduce emissions of criteria pollutants as outlined by the San Joaquin Valley Air Pollution Control District (SJVAPCD).	**Consistent.** The SJVAPCD requires construction-related mitigation in accordance with their rules and regulations. The proposed Master Plan would comply with pre-existing requisite federal, State, SJVAPCD, and other local regulations and requirements, as well as implement the mitigation measures provided by the SJVAPCD for construction-related emissions.	**Consistent.** The Vista Ranch Development would comply with all applicable SJVAPCD Best Management Practices (BMPs) during construction activities, including basic dust control measures required under SJVAPCD Rule 8201. Moreover, Table 3.3-8 in Section 3.3, Air Quality, shows that annual criteria pollutant emissions would not exceed any of the SJVAPCD's regional thresholds of significance during construction.
AQ Policy 1.8	Maintain or plant trees where appropriate to provide shade, absorb carbon, improve oxygenation, slow stormwater runoff, and reduce the heat island effect.	**Consistent.** The proposed Master Plan includes approximately 59 acres of parks, trails, and preserved open space.	**Consistent.** The Vista Ranch Development includes landscaping and trees, as well as many acres of parks, trails, and open space. The proposed project would include a multitude of tree lined streets and trails.
Housing Element			
Policy H-1.1	Maintain an adequate supply of appropriately zoned land to support the production of at least 8,977 housing units in Clovis between 2023 and 2031 to accommodate the local and regional housing need.	**Consistent.** The proposed Master Plan would actively support the goals of the new housing element by providing additional housing, at a variety of income levels and configurations, thereby assisting the City with the creation of new housing as required by the Regional Housing Needs Assessment.	**Consistent.** The Vista Ranch Development proposes 2,718 new residential units including single- and multi-family units at varying densities.

Source: FirstCarbon Solutions (FCS). 2025.

Overall, for the reasons described above, the proposed Master Plan would be consistent with applicable General Plan policies.

Clovis Zoning Code

The Clovis Zoning Code implements the General Plan. The Master Plan Area is currently within the jurisdiction of Fresno County. The Fresno LAFCo would require the SOI Expansion Area to be pre-zoned by the City in conjunction with the proposed annexation.

The Master Plan contemplates a pre-zoning request for the Master Plan Area to the following City zoning districts: R-1, R-1-MD, R-2, R-4, C-1, C-R, M-1, and O. Since all of these zoning districts are within the M-P-C Overlay District, they would include the M-P-C suffix and would be subject to the development standards as modified and adopted in the Master Plan.

- **Single-Family Residential Low-Density Zoning (R-1):** This designation identifies areas appropriate for conventional single-family uses. The allowable density range is 2.1 to 5.0 dwelling units per acre (du/acre).
- **Single-Family Residential Medium-Density Zoning (R-1-MD):** This designation identifies areas appropriate for single-family uses, including attached and detached single-family structures. The allowable density range is 4.1 to 12.0 du/acre.
- **Single-Family Residential Medium High-Density Zoning (R-2):** This designation identifies areas appropriate for moderately dense residential uses, including multi-family apartments, duplexes, townhouses, and small parcel, attached, and detached single-family uses. The allowable density range is 7.1 to 15.0 du/acre.
- **Multi-Family Residential Very High-Density Zoning (R-4):** This designation identifies areas appropriate for high and very high-density residential uses, particularly in association with mixed-use development. The allowable density range is 25.1 to 43.0 du/acre.
- **Neighborhood Commercial Zoning (C-1):** This designation identifies areas appropriate for providing convenience services, compatible with adjacent neighborhood areas.
- **Community Recreation Zoning (C-R):** This designation identifies areas appropriate for commercial recreation into a planned integrated center for the community.
- **Light Industrial Zoning (M-1):** This designation identifies areas appropriate for business parks and industrial uses, including mini-warehouse storage.
- **Open Space and Parks Zoning (O):** This designation identifies areas appropriate for open space, such as parks, flood control channels, greenbelts, parkways, ponding basins, trails, and wildlife preserves.

The pre-zoning would go into effect upon annexation into the City. The proposed zone change would make the zoning consistent with the proposed General Plan designation within MP Area 1. The zoning ordinance establishes permitted uses, development densities and intensities, and development standards for each zone to ensure that public health, safety, and general welfare are protected, consistent with the Zoning Code. The City would review each component of the proposed

Master Plan as plans (improvement plans, building plans, site plans, etc.) are submitted for final approval to ensure that they are consistent with the City's Zoning ordinance. As such, impacts related to zoning consistency are less than significant.

Fresno LAFCo

The Master Plan Area is currently in an unincorporated portion of Fresno County adjacent to the city limits, outside the City's SOI (as defined in the General Plan). The proposed Master Plan includes an annexation of approximately 507 acres, which covers the entire boundary of the proposed Master Plan. The annexation does not include the approximately 445-acre Non-development Area. The final annexation boundary may be refined as part of the study process, which would ultimately include a public hearing before Fresno LAFCo, who has the final statutory authority to set annexation boundaries.

LAFCo is serving as a Responsible Agency for this Revised Draft EIR pursuant to their Annexation Policies and Procedures. When LAFCo is a Responsible Agency under CEQA, in order to approve the annexation, the Commission would certify that it has reviewed the Lead Agency's environmental documents and, if required, adopt findings for approval and statements of overriding considerations in accordance with Sections 15091 and 15903 of the CEQA Guidelines.

The Fresno LAFCo would review the proposed annexation for consistency with the Annexation Policies and Procedures. These policies and procedures govern Fresno LAFCo determinations regarding annexations to all agencies. The following policies would be reviewed as part of the annexation process by the Fresno LAFCo.

1. The annexation program is consistent with LAFCo's SOI for the City.
   Suggested actions:
   - City and County shall reach agreement on development standards and planning and zoning requirements within the sphere to ensure that development within the SOI occurs in a manner that reflects the concerns of the affected City and is accomplished in a manner that promotes the logical and orderly development of areas within the SOI (Gov. Code § 56425).
   - City responds to a request to extend service outside of its City limits and SOIs in consultation with Gov. Code Section 56133 and Fresno LAFCo policy.

   Project discussion

   The proposed Master Plan includes an annexation of approximately 507 acres, which covers the entire boundary of the proposed Master Plan. The annexation does not include the approximately 445-acre Non-development Area. The amendment of the City's SOI would require an application and approval by the Fresno LAFCo. The SOI Amendment would be reviewed by the City and LAFCo prior to proceeding with the requested annexation. If the SOI Amendment is approved, the proposed project would then be able to begin the annexation process.

2. The annexation program clearly implements the City's General Plan.

Suggested actions:

- City annexation applications shall describe how the proposal implements the City's General Plan and support these statements with information from other official sources such as the annual budget, capital improvement plan, and so forth.
- A pre-zoning ordinance shall not be encumbered with extraneous conditions that preclude the ordinance's effective date by the time of LAFCo hearing on the annexation.

Project discussion

The proposed Master Plan includes the adoption of pre-zoning for the proposed annexation area, which would serve to regulate the uses of land and structures within the Master Plan Area. The Master Plan Area is currently located outside of the city limits and, therefore, does not have City-designated zoning. The proposed Master Plan includes a request for pre-zoning within the Master Plan to appropriate City zoning districts. The portion of the SOI Expansion Area that is outside of the Master Plan Area would not receive pre-zoning designations.

Master Plan: The Master Plan contemplates a pre-zoning request for the Master Plan Area to the following City zone districts: R-1, R-1-MD, R-2, R-4, C-1, C-R, M-1, and O. Since all these zone districts are within the M-P-C Overlay District, they would include the M-P-C suffix and subject to the development standards as modified and adopted in the Master Plan.

The proposed City zoning for the Master Plan Area is shown on Exhibit 2-9. The proposed project would be subject to the development standards described in the CMC to ensure consistency between land use and zoning designations

3. The annexation program emphasizes the use of cities' resolution of application versus property owner/registered voter petitions.
   Suggested action:
   - For the City to consider opposing property owner petition-initiated reorganizations as these would not have proceeded through the process of City development review and approval, which is an important step in the management of a city's general plan.

   Project discussion

   No opposing property owner petition-initiated reorganizations exist for the proposed Master Plan.

4. The annexation program supports orderly growth by identifying areas to be annexed, general time frames for growth, and a plan for extension of services to these areas.
   Suggested actions:
   - Capital improvement plan and/or facilities plans include all lands within the SOI.
   - Development impact fees that fund the extension of services are established and maintained.
   - Impacts to service delivery are assessed in the City's EIR or project-specific CEQA documents and appropriately-scaled mitigation is approved and implemented.

- The City coordinates its public policy documents in support of the annexation program.

Project discussion

This Revised Draft EIR assesses service capacity and demands for utilities services and public services. There are no service deficiencies noted by the City or contained within this Revised Draft EIR that are anticipated to occur after installation of infrastructure. The Master Plan Area is also designated for residential uses by the City's General Plan.

5. The annexation program anticipates changes of organization of existing service districts and service areas in the SOI or adjacent to the SOI.

   Suggested action:

   - The Program should describe the transition of services that will occur when the City annexes/detaches (CID, NCFPD, FCFPD, KRCD, etc.); inversely, the document describes the status of or continuation of services when annexations do not result in detachment (FID, FMFCD, etc.).

   Project discussion

   As noted previously, this Revised Draft EIR assesses service capacity and demands for utilities services and public services. There are no service deficiencies noted by the City, or contained within this Revised Draft EIR, that are anticipated to occur after installation of infrastructure. The Master Plan Area is also designated for residential uses by the City's General Plan.

6. The annexation program anticipates the location of Disadvantaged Unincorporated Communities (DUC) within a City's Sphere of Influence.

   Suggested action:

   - Cities should become proficient in implementing their responsibilities under Senate Bill 244, should review Fresno LAFCo DUC policy and review Senate Bill 244 Technical Advisory.

   Project discussion

   The Master Plan Area is not located in or adjacent to a DUC.

7. The annexation program informs citizens in annexation areas of their rights, benefits, and changes that will occur on annexation.

   Suggested actions:

   - City to establish and maintain on its website a description of the information above, how citizens can engage the process, and how the City engages citizens and stakeholders and other information related to annexation. This information should include a description of the SOI, protest processes, and how LAFCo is involved.
   - For those portions of a City's SOI that contain a large number of rural residential parcels that are planned for urban uses, the City is strongly encouraged to develop a long-term plan to annex and serve these areas.

Project discussion

As noted previously, this Revised Draft EIR assesses service capacity and demands for utilities services and public services. There are no service deficiencies noted by the City, or contained within this Revised Draft EIR, that are anticipated to occur after installation of infrastructure. The Master Plan Area is also designated for Urban Center uses by the City's General Plan. It is noted, however, that the proposed annexation area was not included in the City's latest Municipal Service Review.

8. The annexation program will be coordinated with LAFCo's MSR for the City.
   Suggested action:
   - City applications should include an assessment of current MSR determinations and recommendations.

   Project discussion

   As noted previously, this Revised Draft EIR assesses service capacity and demands for utilities services and public services. There are no service deficiencies noted by the City, or contained within this Revised Draft EIR, that are anticipated to occur after installation of infrastructure. The Master Plan Area is also designated for Urban Center uses by the City's General Plan. It is noted, however, that the proposed annexation area was not included in the City's latest MSR.

9. The annexation program is managed by an assigned and responsible City staff member.
   Suggested action:
   - City identifies a staff member to serve as a genuine point of contact with LAFCo—that is, a staff member responsible and accountable for managing applications, knowledgeable of the project and of LAFCo's process, and empowered to facilitate the City's annexation program.

   Project discussion

   This requirement applies to the City and not individual development projects, and as such, is not applicable to the proposed Master Plan.

10. City entitlement analysis is integrated with LAFCo policies.
    Suggested action:
    - Local agencies, including Fresno County, are strongly advised to include Fresno LAFCo in their initial request for comments.
    - When initial planning applications that will eventually require annexation are submitted to cities, they are encouraged to submit a pre-application to LAFCo so that LAFCo can track the project at its beginning and provide comments that would facilitate annexation in time for these to be considered in a timely and efficient manner.

    Project discussion

    This City has coordinated with LAFCo through the release of the NOP and invitation to the Scoping meeting. The City would ultimately coordinate with LAFCo if the City decides that the

SOI Expansion Area should be annexed into the City. At that time, the City would submit the appropriate applications and documentations for LAFCo's consideration of the City's annexation approval.

The policies discussed above are intended to ensure orderly reorganization to local jurisdictional boundaries, including annexations. Ultimately, LAFCo would determine whether the proposed annexation would first require an update to the Municipal Service Review in order to approve the annexation. This LAFCo policy was not specifically adopted to avoid or mitigate an environmental effect, rather it is intended to ensure orderly and logical reorganization to local jurisdiction boundaries, including annexations. The proposed Master Plan is consistent with LAFCo policies adopted to address environmental impacts.

As such, implementation of the proposed Master Plan would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the Master Plan adopted to avoid or mitigate an environmental effect, and impacts would be less than significant. No mitigation would be required.

Vista Ranch Development/MP Area 1

City of Clovis General Plan Consistency

The Master Plan proposes a General Plan Land Use Amendment to designate MP Area 1 as Mixed Use Village. The Vista Ranch Development is designed to be consistent with this designation.

As shown in Table 3.11-1, the proposed Vista Ranch Development would be consistent with the applicable goals and policies of the General Plan. Compliance with applicable General Plan policies would ensure that impacts related to potential conflicts with an applicable land use plan, policy, or regulation would be less than significant.

City of Clovis Municipal Code Consistency

MP Area 1 is currently within the jurisdiction of Fresno County and would be pre-zoned by the City in conjunction with the proposed annexation and as part of the Master Plan as described above. The proposed Vista Ranch Development is designed to be consistent with this zoning.

All existing City development standards and zoning requirements for the proposed zoning are applicable to any activities within MP Area 1. Approval of the pre-zoning would ensure that the proposed Vista Ranch Development would be consistent with the Zoning Code and would have a less than significant impact relative to this topic, and no mitigation is required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
Master Plan and MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

The geographic context of cumulative impacts related to land use and planning generally includes Fresno County, including the City. All of the projects listed in Table 3-1 would be within the geographic scope. This analysis evaluates whether the proposed project would result in a cumulatively significant impact related to land use and planning. This analysis then considers whether incremental contributions to cumulative impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to a level of significance.

Development within Fresno County and the City is governed by the applicable plans, programs, policies, and land use regulations, which ensure logical and orderly development and require discretionary review to ensure that projects do not divide an established community or result in environmental impacts resulting from inconsistency with applicable land use planning regulations including, but not limited to the General Plan and Zoning Ordinance. Conformance with these land use planning regulations would be confirmed during project approval. Cumulative projects within the City would be required to comply with the General Plan. Projects not consistent with existing land use designations would require approval of a General Plan Amendment, as applicable. For these reasons, there would be a less than significant cumulative impact related to land use and planning.

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

As shown in Table 3.11-1, the proposed Master Plan is consistent with the City's existing General Plan policies and would not conflict with policies adopted to avoid or mitigate an environmental effect. The proposed Master Plan would require a General Plan Land Use Amendment to adjust the land use designation to Mixed Use Village as well as pre-zoning for R-1, R-1-MD, R-2, R-4, C-1, C-R, M-1, and O within the Master Plan Area to accommodate the proposed development density. Approval of the General Plan Amendment and pre-zoning would ensure that the proposed Master Plan would be substantially consistent with the General Plan land use requirements. Future development under the proposed Master Plan would be subject to discretionary review, which would ensure that development would not result in environmental impacts caused by inconsistency with the General Plan and applicable specific plans and applicable codes, ordinances, and policies or other land use planning regulations. For these reasons, the incremental contribution of the proposed Master Plan to the less than significant cumulative impacts would be considered less than significant.

Vista Ranch Development/MP Area 1

The Vista Ranch Development would be constructed in compliance with the General Plan and Zoning Ordinance and thus would not conflict with existing land use plans, policies, or other regulations. As the proposed project would not result in significant land use or planning conflicts, it would not contribute to an overall cumulative land use or planning conflict in the area. For these reasons, the

incremental contribution of the Vista Ranch Development to the less than significant cumulative impacts would be considered less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
Master Plan and MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.12 - Noise

3.12.1 - Introduction

This section describes the existing noise setting and potential effects from project implementation on the Sphere of Influence (SOI) Expansion Area and its surrounding area. Descriptions and analysis in this section are based on noise modeling performed by FirstCarbon Solutions (FCS). The noise modeling output is included in this Revised Draft Environmental Impact Report (Revised Draft EIR) as Appendix J.

The following public comments were received during the Revised Draft EIR Notice of Preparation (NOP) scoping period related to noise.

- Comment requesting that construction equipment be located away from the school site and implement the best available technology to minimize air and noise pollution during construction, as well as avoid vehicle idling and adhere to local noise ordinances. (pp. 3.12-22; 3.12-27 to 3.12-29; 3.12-31 to 3.12-33)
- Comment(s) expressing concerns related to an increase in noise pollution. (pp. 3.12-21 to 3.12-37)
- Comment(s) expressing concerns related to noise. (pp. 3.12-21 to 3.12-37)

3.12.2 - Environmental Setting

Characteristics of Noise

Noise is generally defined as unwanted or objectionable sound. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment. Noise effects can be caused by pitch or loudness. *Pitch* is the number of complete vibrations or cycles per second of a wave that result in the range of tone from high to low; higher-pitched sounds are louder to humans than lower-pitched sounds. *Loudness* is the intensity or amplitude of sound.

Sound is produced by the vibration of sound pressure waves in the air. Sound pressure levels are used to measure the intensity of sound and are described in terms of decibels. The decibel (dB) is a logarithmic unit, which expresses the ratio of the sound pressure level being measured to a standard reference level. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. Audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Only audible changes in existing ambient or background noise levels are considered potentially significant.

The human ear is not equally sensitive to all frequencies within the audible sound spectrum, so sound pressure level measurements can be weighted to better represent frequency-based sensitivity of average healthy human hearing. One such specific "filtering" of sound is called "A-weighting." A-weighted decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies that are audible to the human ear. Because decibels are logarithmic units, they cannot be added or subtracted by ordinary arithmetic means. For example, if one noise source produces a noise level of 70 dB, the addition of another noise source with the same noise level would not produce 140 dB; rather, they would combine to produce a noise level of 73 dB.

Noise Descriptors

There are many ways to rate noise for various intervals, 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} and Community Noise Equivalent Level (CNEL) or 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 a 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 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.

Other noise rating scales of importance when assessing the annoyance factor include the maximum noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis are specified in terms of maximum levels denoted by L_{max} for short-term noise impacts. L_{max} reflects peak operating conditions and addresses the annoying aspects of intermittent noise.

Noise Propagation

From the noise source to the receiver, noise changes both in level and frequency spectrum. The most obvious is the decrease in noise as the distance from the source increases. The manner in which noise reduces with distance depends on whether the source is a point or line source, as well as ground absorption, atmospheric conditions (wind, temperature gradients, and humidity) and refraction, and shielding by natural and manufactured features. Sound from point sources, such as an air conditioning condenser, a piece of construction equipment, or an idling truck, radiates uniformly outward as it travels away from the source in a spherical pattern.

The attenuation or sound drop-off rate is dependent on the conditions of the land between the noise source and receiver. To account for this ground-effect attenuation (absorption), two types of site conditions are commonly used in noise models: soft-site and hard-site conditions. Soft-site conditions account for the sound propagation loss over natural surfaces such as normal earth and ground vegetation. For point sources, a drop-off rate of 7.5 dBA per each doubling of the distance (dBA/DD) is typically observed over soft ground with landscaping, as compared with a 6 dBA/DD drop-off rate

over hard ground such as asphalt, concrete, stone and very hard packed earth. For line sources, such as traffic noise on a roadway, a 4.5 dBA/DD is typically observed for soft-site conditions compared to the 3 dBA/DD drop-off rate for hard-site conditions. Table 3.12-1 briefly defines these measurement descriptors and other sound terminology used in this section.

Table 3.12-1: Sound Terminology

Term	Definition
Sound	A vibratory disturbance created by a vibrating object which, when transmitted by pressure waves through a medium such as air, can be detected by a receiving mechanism such as the human ear or a microphone.
Noise	Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
Ambient Noise	The composite of noise from all sources near and far in a given environment.
Decibel (dB)	A unitless measure of sound on a logarithmic scale, which represents the squared ratio of sound pressure amplitude to a reference sound pressure. The reference pressure is 20 micropascals, representing the threshold of human hearing (0 dB).
A-Weighted Decibel (dBA)	An overall frequency-weighted sound level that approximates the frequency response of the human ear.
Equivalent Noise Level (L_{eq})	The average sound energy occurring over a specified time period. In effect, L_{eq} is the steady-state sound level that in a stated period would contain the same acoustical energy as the time-varying sound that actually occurs during the same period.
Maximum and Minimum Noise Levels (L_{max} and L_{min})	The maximum or minimum instantaneous sound level measured during a measurement period.
Day-Night Level (DNL or L_{dn})	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m. (nighttime).
Community Noise Equivalent Level (CNEL)	The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring between 7:00 p.m. and 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring between 10:00 p.m. and 7:00 a.m.

Source: Data compiled by FirstCarbon Solutions (FCS). 2024.

Traffic Noise

The level of traffic noise depends on the three primary factors: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater number of trucks. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. Because of the logarithmic nature of noise levels, a doubling of the traffic volume (assuming that the speed and truck mix do not change) results in a noise level increase of 3 dBA. Based on the Federal Highway Administration (FHWA) community noise assessment criteria, this change is "barely perceptible." For reference, a doubling of perceived noise levels would require an increase of approximately 10 dBA. The truck mix on a given roadway also has an effect on community noise levels. As the number of heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise levels increase.

Stationary Noise

A stationary noise producer is any entity in a fixed location that emits noise. Examples of stationary noise sources include machinery, engines, energy production, and other mechanical or powered equipment and activities, such as loading and unloading or public assembly that may occur at commercial, industrial, manufacturing, or institutional facilities. Furthermore, while noise generated by the use of motor vehicles over public roads is preempted from local regulation, although the use of these vehicles is considered a stationary noise source when operated on private property such as at a construction site, a truck terminal, or warehousing facility. The emitted noise from the producer can be mitigated to acceptable levels either at the source or on the adjacent property through the use of proper planning, setbacks, block walls, acoustic-rated windows, or dense landscaping or by changing the location of the noise producer.

The effects of stationary noise depend on factors, such as characteristics of the equipment and operations, distance and pathway between the generator and receptor, and weather. Stationary noise sources may be regulated at the point of manufacture (e.g., equipment or engines), with limitations on the hours of operation, or with provision of intervening structures, barriers, or topography.

Construction activities are a common source of stationary noise. Construction-period noise levels are higher than background ambient noise levels but eventually cease once construction is complete. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on each construction site and, therefore, would change the noise levels 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 3.12-2 shows typical noise levels of construction equipment as measured at a distance of 50 feet from the operating equipment.

Table 3.12-2: Typical Construction Equipment Maximum Noise Levels

Type of Equipment	Impact Device? (Yes/No)	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Impact Pile Driver	Yes	95
Auger Drill Rig	No	85
Vibratory Pile Driver	No	95
Jackhammers	Yes	85
Pneumatic Tools	No	85
Pumps	No	77
Scrapers	No	85
Cranes	No	85
Portable Generators	No	82
Rollers	No	85
Bulldozers	No	85
Tractors	No	84
Front-end Loaders	No	80
Backhoe	No	80
Excavators	No	85
Graders	No	85
Air Compressors	No	80
Dump Truck	No	84
Concrete Mixer Truck	No	85
Pickup Truck	No	55

Notes:
dBA = A-weighted decibel
Source: Federal Highway Administration (FHWA) 2006. Highway Construction Noise Handbook, August.

Noise from Multiple Sources

Because sound pressure levels in decibels are based on a logarithmic scale, they cannot be added or subtracted in the usual arithmetical way. Therefore, sound pressure levels in decibels are logarithmically added on an energy summation basis. In other words, adding a new noise source to an existing noise source, both producing noise at the same level, will not double the noise level. Instead, if the difference between two noise sources is 10 dBA or more, the louder noise source will dominate, and the resultant noise level will be equal to the noise level of the louder source. In general, if the difference between two noise sources is 0–1 dBA, the resultant noise level will be 3 dBA higher than the louder noise source, or both sources if they are equal. If the difference between

two noise sources is 2–3 dBA, the resultant noise level will be 2 dBA above the louder noise source. If the difference between two noise sources is 4–10 dBA, the resultant noise level will be 1 dBA higher than the louder noise source.

Characteristics of Vibration

Groundborne vibration consists of rapidly fluctuating motion through a solid medium, specifically the ground, which has an average motion of zero and in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. The effects of groundborne vibration typically only causes a nuisance to people, but in extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. Groundborne noise is an effect of groundborne vibration and only exists indoors, since it is produced from noise radiated from the motion of the walls and floors of a room, and may also consist of the rattling of windows or dishes on shelves.

Several different methods are used to quantify vibration amplitude, such as the maximum instantaneous peak in the vibrations velocity, which is known as the peak particle velocity (PPV) or the root mean square (rms) amplitude of the vibration velocity. Because of the typically small amplitudes of vibrations, vibration velocity is often expressed in decibels—denoted as LV—and is based on the reference quantity of 1 microinch per second. To distinguish vibration levels from noise levels, the unit is written as "VdB."

Although groundborne vibration can be felt outdoors, it is typically only an annoyance to people indoors where the associated effects of the shaking of a building can be notable. When assessing annoyance from groundborne vibration, vibration is typically expressed as rms velocity in units of decibels of 1 microinch per second, with the unit written in VdB. Typically, developed areas are continuously affected by vibration velocities of 50 VdB or lower. Human perception to vibration starts at levels as low as 67 VdB. Annoyance due to vibration in residential settings starts at approximately 70 VdB.

Off-site sources that may produce perceptible vibrations are usually caused by construction equipment, steel-wheeled trains, and traffic on rough roads, while smooth roads rarely produce perceptible groundborne noise or vibration. Construction activities, such as blasting, pile driving and operating heavy earthmoving equipment, are common sources of groundborne vibration. Construction vibration impacts on building structures are generally assessed in terms of PPV. Typical vibration source levels from construction equipment are shown in Table 3.12-3.

Table 3.12-3: Vibration Levels of Construction Equipment

Construction Equipment	PPV at 25 Feet (inches/second)	rms Velocity in Decibels (VdB) at 25 Feet
Water Trucks	0.001	57
Scraper	0.002	58

Construction Equipment	PPV at 25 Feet (inches/second)	rms Velocity in Decibels (VdB) at 25 Feet
Bulldozer—small	0.003	58
Jackhammer	0.035	79
Concrete Mixer	0.046	81
Concrete Pump	0.046	81
Paver	0.046	81
Pickup Truck	0.046	81
Auger Drill Rig	0.051	82
Backhoe	0.051	82
Crane (mobile)	0.051	82
Excavator	0.051	82
Grader	0.051	82
Loader	0.051	82
Loaded Trucks	0.076	86
Bulldozer (large)	0.089	87
Caisson drilling	0.089	87
Vibratory Roller (small)	0.101	88
Compactor	0.138	90
Clam shovel drop	0.202	94
Vibratory Roller (large)	0.210	94
Pile Driver (impact-typical)	0.644	104
Pile Driver (impact-upper range)	1.518	112

Notes:
PPV = peak particle velocity
rms = root mean square
VdB = velocity in decibels
Sources: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.
Federal Highway Administration (FHWA). 2006. Highway Construction Noise Handbook. August.

The propagation of groundborne vibration is not as simple to model as airborne noise. This is because noise in the air travels through a relatively uniform medium, while groundborne vibrations travel through the earth, which may contain significant geological differences. Factors that influence groundborne vibration include:

- **Vibration source:** Type of activity or equipment, such as impact or mobile, and depth of vibration source;
- **Vibration path:** Soil type, rock layers, soil layering, depth to water table, and frost depth; and
- **Vibration receiver:** Foundation type, building construction, and acoustical absorption.

Among these factors that influence groundborne vibration, there are significant differences in the vibration characteristics when the source is underground compared to at the ground surface. In addition, soil conditions are known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock. Vibration propagation is more efficient in stiff clay soils than in loose sandy soils, and shallow rock seems to concentrate the vibration energy close to the surface and can result in groundborne vibration problems at large distances from the source. Factors such as layering of the soil and depth to the water table can have significant effects on the propagation of groundborne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard, rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils. There are three main types of vibration propagation: surface, compression, and shear waves. Surface waves, or Rayleigh waves, travel along the ground's surface. These waves carry most of their energy along an expanding circular wave front, similar to ripples produced by throwing a rock into a pool of water. P-waves, or compression waves, are body waves that carry their energy along an expanding spherical wave front. The particle motion in these waves is longitudinal (i.e., in a "push-pull" fashion). P-waves are analogous to airborne sound waves. S-waves, or shear waves, are also body waves that carry energy along an expanding spherical wave front. However, unlike P-waves, the particle motion is transverse, or side-to-side and perpendicular to the direction of propagation.

As vibration waves propagate from a source, the vibration energy decreases in a logarithmic nature and the vibration levels typically decrease by 6 VdB per doubling of the distance from the vibration source. As stated above, this drop-off rate can vary greatly depending on the soil type, but it has been shown to be effective enough for screening purposes, in order to identify potential vibration impacts that may need to be studied through actual field tests. The vibration level (calculated below as "PPV") at a distance from a point source can generally be calculated using the vibration reference equation:

$$PPV = PPV_{ref} * (25/D)^n \text{ (in/sec)}$$

Where:

PPV_{ref} = reference measurement at 25 feet from vibration source
D = distance from equipment to the receptor
n = vibration attenuation rate through ground

According to Section 7 of the Federal Transit Administration's (FTA) Transit Noise and Vibration Impact Assessment Manual, an "n" value of 1.5 is recommended to calculate vibration propagation through typical soil conditions.[1]

[1] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed October 21, 2025.

Existing Noise Levels

Ambient Noise

FCS conducted five short-term noise measurements on April 10, 2025, from 11:54 a.m. to 2:16 p.m. The noise measurements were taken during the midday hours, as the midday hours typically have the highest daytime noise levels in urban environments. It should be noted that peak noise hours often vary slightly from peak traffic hours, as peak noise hours more closely align with high volume traffic that is still free flowing; while peak traffic hours often result in slower vehicle speeds due to the volume of traffic on the roadway. The short-term existing noise measurement results are summarized in Table 3.12-4. The noise measurement data sheets and noise monitoring location map are provided in Appendix J.

Table 3.12-4: Existing Ambient Noise Levels on the SOI Expansion Area

Site ID #	Location/Dominant Noise Source	L_{eq}
ST-1	20 feet north of East Shepherd Avenue. Southern border of the SOI Expansion Area. The dominant noise source is traffic from East Shepherd Avenue.	67.4
ST-2	Off North Burgan Avenue down the canal walkway to the very end where it touches the western border of the SOI Expansion Area. The dominant noise source is traffic off East Shepherd Avenue in the far-off distance.	40.7
ST-3	30 feet north of East Shepherd Avenue. Southern border of the SOI Expansion Area. Dominant noise sources include traffic from East Shepherd Avenue and North Temperance Avenue; however, this measurement was taken by a 4-way stop, which causes vehicles to slow down and stop, which in turn creates a quieter noise environment compared to measurement ST-1, which was taken adjacent to the roadway but not near traffic lights.	55.7
ST-4	20 feet off North Fowler Avenue. Dominant noise sources include traffic off North Fowler Avenue. A single noise event was observed during measurements (overhead helicopter). The noise event occurred at 1:42 p.m. and noise levels reached >68 dBA L_{eq}. This noise event is brief and not a substantial noise increase; therefore, the noise results for this measurement can still be utilized.	59.9
ST-5	20 feet directly west of the northwest corner of the SOI Expansion Area. The dominant noise sources are traffic noise on East Behymer Avenue and birds chirping.	46.4

Notes:
dBA = A-weighted decibel
L_{eq} = equivalent sound level
SOI = Sphere of Influence

Source: FirstCarbon Solutions (FCS). 2025.

Noise-sensitive Land Uses

Noise-sensitive land uses generally consist of those uses where exposure to noise would result in adverse effects, as well as uses for which quiet is an essential element of their intended purpose.

Residential dwellings are of primary concern, because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Other typical noise-sensitive land uses include hospitals, convalescent facilities, hotels, religious institutions, libraries, and other uses where low noise levels are essential.

There are existing rural residential, as well as very-low, low-, and medium high-density residential, land uses adjacent to the southern, western, and northern boundaries of the SOI Expansion Area.

3.12.3 - Regulatory Framework

Federal

Noise Control Act

The adverse impact of noise was officially recognized by the federal government in the Noise Control Act of 1972, which serves three purposes:

- Promulgating noise emission standards for interstate commerce
- Assisting State and local abatement efforts
- Promoting noise education and research

The Federal Office of Noise Abatement and Control (ONAC) was initially tasked with implementing the Noise Control Act. However, the ONAC has since been eliminated, leaving the development of federal noise policies and programs to other federal agencies and interagency committees.

Among the agencies now regulating noise are the Occupational Safety and Health Administration (OSHA), which limits noise exposure of workers to 90 dB L_{eq} or less for 8 continuous hours or 105 dB L_{eq} or less for 1 continuous hour; the United States Department of Transportation (USDOT), which assumed a significant role in noise control through its various operating agencies; and the Federal Aviation Administration (FAA), which regulates noise of aircraft and airports. Surface transportation system noise is regulated by a host of agencies, including the FTA. Transit noise is regulated by the federal Urban Mass Transit Administration, while freeways that are part of the interstate highway system are regulated by the FHWA. Finally, the federal government actively advocates that local jurisdictions use their land use regulatory authority to arrange new development in such a way that “noise-sensitive” uses are either prohibited from being sited adjacent to a highway or, alternatively, that developments are planned and constructed in such a manner that minimize potential noise impacts.

Since the federal government has preempted the setting of standards for noise levels that can be emitted by transportation sources, local jurisdictions are limited to regulating the noise generated by the transportation system through nuisance abatement ordinances and land use planning.

Federal Transit Administration Standards and Guidelines

The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment

Manual.[2] The FTA guidelines include thresholds for construction vibration impacts for various structural categories as shown in Table 3.12-5.

Table 3.12-5: Federal Transit Administration Construction Vibration Impact Criteria

Building Category	PPV (in/sec)	Approximate VdB
I. Reinforced Concrete, Steel, or Timber (no plaster)	0.5	102
II. Engineered Concrete and Masonry (no plaster)	0.3	98
III. Nonengineered Timber and Masonry Buildings	0.2	94
IV. Buildings Extremely Susceptible to Vibration Damage	0.12	90

Notes:
in/sec = inches per second
PPV = peak particle velocity
VdB = velocity in decibels
Source: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

The FTA has also established criteria for the assessment of construction noise impacts. The FTA's day and nighttime criteria are shown in Table 3.12-6. According to the FTA, exceedances of these criteria may result in adverse community reaction.

Table 3.12-6: Federal Transit Administration Construction Noise Impact Criteria

Land Use	$L_{eq\ equipment\ (8hr)}$[A]	
	Day	Night
Residential	80	70
Commercial	85	85
Industrial	90	90

Notes:
$L_{eq\ equipment\ (8hr)}$ = equipment noise level in Leq over an 8-hour time period. The analysis assumes that the L_{eq} over this time period would be approximately equal to the L_{eq} over a single construction workday, from start to finish of that day's activities.
Source: Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

State

California General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use

[2] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed October 21, 2025.

planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature but are recommendations intended to aid communities in determining their own noise-acceptability standards.

California Building Standards Code

California has established noise insulation standards for new hotels, motels, apartment houses, and dwellings (other than single-family detached housing). These requirements are provided in the California Building Standards Code (CBC) (California Code of Regulations [CCR] Title 24). The 2022 CBC was published on July 1, 2022, with an effective date of January 1, 2023. As provided in the CBC, the noise insulation standards set forth an interior standard of 45-dBA CNEL as measured from within a structure's interior. When such structures are located within a 65-dBA CNEL (or greater) exterior noise contour associated with a traffic noise along a roadway, an acoustical analysis is required to ensure that interior levels do not exceed the 45dBA CNEL threshold. Title 24 standards are typically enforced by local jurisdictions through the building permit application process.

Assembly Bill 1307

Assembly Bill (AB) 1307 went into effect January 1, 2024. This bill clarifies that "for residential projects, the effects of noise generated by project occupants and their guests on human beings is not a significant effect on the environment." Therefore, this analysis does not address potential noise impacts from future occupants and their guests on sensitive receptors in the project vicinity.

Local

City of Clovis General Plan

The SOI Expansion Area is located within the City of Clovis (City). The City has established noise policies for residential and nonresidential land uses in the Environmental Safety Element of the City of Clovis General Plan (General Plan) and in the City of Clovis Municipal Code (CMC).[3,4]

The General Plan contains policies and guidelines that address noise within the City. The following policies and guidelines are applicable to the proposed project:

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 3.14 **Control sound at the source.** Prioritize using noise mitigation measures to control sound at the source before buffers, soundwalls, and other perimeter measures.

[3] City of Clovis. 2014. City of Clovis General Plan. Environmental Safety Element. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_safety_element.php. Accessed February 13, 2025.

[4] City of Clovis. 2025. City of Clovis Municipal Code. Chapter 9.22.80 Noise. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis0922.html#9.22.080. Accessed May 12, 2025.

The Clovis General Plan guidelines rank noise land use compatibility in terms of clearly compatible, normally compatible, normally incompatible, and clearly incompatible. These guidelines are summarized in Table 3.12-7 below.

Table 3.12-7: Land Use and Noise Compatibility Matrix

Land Uses	Energy Average (CNEL)						
Example Land Uses	**<**	**55**	**60**	**65**	**70**	**75**	**80>**
Amphitheater, concert hall, auditorium, meeting hall	B	B	C	C	D	D	D
Mobile home	A	A	B	C	C	D	D
Hospital, library, school, faith/religious uses	A	A	B	C	C	D	D
Hotel, motel, transient lodging	A	A	B	B	C	C	D
Single-family, multi-family, faith/religious uses	A	A	B	B	C	D	D
Parks	A	A	A	B	C	D	D
Office building, research and development, professional office, City office building, and hotel	A	A	A	B	B	C	D
Amusement park, miniature golf, go-cart track, health club, equestrian center	A	A	A	B	B	D	D
Golf courses, nature centers, cemeteries, wildlife reserves, wildlife habitat	A	A	A	A	B	C	C
Commercial retail, bank, restaurant, movie theater	A	A	A	A	B	B	C
Automobile service station, auto dealer, manufacturing, warehousing, wholesale, utilities	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

Notes:
CNEL = Community Noise Equivalent Level

Compatibility zones indicate the degree to which the land uses listed are compatible with the noise levels (CNEL) shown in the table.

Zone A. Clearly Compatible. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Zone B. Normally Compatible. New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Zone C. Normally Incompatible. New construction or development should normally be discouraged. If new construction or development does proceed, a detailed analysis or noise reduction requirements must be made and needed noise insulation features must be included in the design.

Zone D. Clearly Incompatible. New construction or development should generally not be undertaken.

Source: City of Clovis. 2014. City of Clovis General Plan. Environmental Safety Element. August 25.

City of Clovis Municipal Code

The City also provides noise performance standards in the Noise Ordinance of the CMC.[5] The following noise ordinances and standards are specifically applicable to the proposed project.

5.27.604 Construction Activities.

Chapter 5.27.604 of the CMC addresses construction activities. This section sets the hours of construction 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, except that from June 1 through September 15, construction activity may start after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times be in strict compliance with the permit (CMC § 1, Ord. 14-02, eff. March 5, 2014).

9.22.080 Noise.

According to Section 9.22.080(D), the following noise standards, unless otherwise specifically indicated, shall apply to all property with a designated noise zone. Maximum Exterior Noise Standards and Maximum Interior Noise Standards are provided in Table 3.12-8 and Table 3.12-9, respectively.

Table 3.12-8: Maximum Exterior Noise Standards

Noise Zone	Type of Land Use	Allowable Exterior Noise Level (15-minute L_{eq})	
		7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
I	Single-, two-, or multiple-family residential	55 dBA	50 dBA
II	Commercial	65 dBA	60 dBA
III	Residential portions of mixed-use properties	60 dBA	50 dBA
IV	Industrial or manufacturing	70 dBA	70 dBA

Notes:
dBA = A-weighted decibels
L_{eq} = equivalent sound level

Source: City of Clovis. 2023. Clovis Municipal Code (CMC) Section 9.22.080. August.

Table 3.12-9: Maximum Interior Noise Standards

Noise Zone	Type of Land Use	Allowable Interior Noise Level (15-minute L_{eq})	
		7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
I	Single-, two-, or multiple-family residential	45 dBA	40 dBA

[5] City of Clovis. 2025. City of Clovis Municipal Code. Chapter 9.22.80 Noise. Website: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis0922.html#9.22.080. Accessed May 12, 2025.

Noise Zone	Type of Land Use	Allowable Interior Noise Level (15-minute L_{eq})	
		7 a.m. to 10 p.m.	10 p.m. to 7 a.m.
II	Commercial	50 dBA	—
III	Residential portions of mixed-use properties	45 dBA	40 dBA

Note:
dBA = A-weighted decibels
L_{eq} = equivalent sound level

Source: City of Clovis. 2023. Clovis Municipal Code (CMC) Section 9.22.080. August.

1. If the ambient noise level exceeds the resulting standard, the ambient shall be the standard.
2. It is unlawful for any person to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level when measured on any property measured at the property line, to exceed either of the following within the incorporated area of the City:
   a. The noise standard for the applicable zone for any 15-minute period;
   b. A maximum impulsive noise level equal to the value of the noise standard plus 20 dBA for any period (measured using A-weighted slow response). Impulsive noise which repeats four or more times in any hour between 10:00 p.m. and 7:00 a.m. shall be measured as continuous sound and meet the noise standard for the applicable zone.
3. When properties of two different noise zones abut one another, the maximum exterior noise level shall be the lower of the two noise zones where one zone is residential, and in other contexts shall be the average of the two zones.
4. Commercial, industrial, and recreational uses which create impulsive noise as part of their regular processes, such as using pile drivers, forge hammers, punch presses, and gunshots, shall not be in any zone district adjacent to a residential zone district unless a noise study is completed demonstrating the impulsive noise does not exceed the standards at the property line for the residential zone district. Impulse noise from these uses shall be measured as continuous sound. The noise study shall be subject to review and approval by the Director or his or her designee and shall be completed as part of any discretionary permit process for the use or prior to obtaining a building permit. This provision shall not apply to uses existing on the effective date of the ordinance codified in this title.
5. Emergency electrical generators in residential zone districts shall comply with the California Building Code and California Residential Code, as amended, for the installation and operation of the emergency generator. Test cycle operation shall be limited to the hours between 10:00 a.m. and 4:00 p.m. Emergency electrical generators are intended to provide emergency power to run air conditioning, medical equipment, and other household appliances in the event of a rolling blackout or other power grid failure.

According to Section 9.22.080(E), the measurement of sound levels shall be as follows:

1. Sound level meter. Sound levels shall be measured on the A-weighting network of a sound level meter meeting the requirements of ASA Standards S14-1971 for General Purpose Sound Level Meters, or the latest revision published by the American National Standards Institute, Inc., using the slow meter response. The meter shall be calibrated and used according to the manufacturer's instructions.
2. Location of microphone. Measurements shall be taken with the microphone located at any point on the property line of the noise source, but no closer than three feet from any wall and not less than three feet above the ground.
3. Minimum of two readings. A minimum of two readings shall be taken for a period of 10 minutes each with 10-minute intervals between measurements. The sound level shall be the average of these readings.

According to Section 9.22.080(F), the following activities shall be exempt from the provisions of this Section 9.22.080:

1. Emergency exemption. The emission of sound for the purpose of alerting persons to the existence of an emergency, or the emission of sound in the performance of emergency work.
2. Warning devices. Warning devices necessary for the protection of public safety, (e.g., ambulance, fire, and police sirens, and train horns).
3. Railroad activities. All locomotives and rail cars operated by a railroad that is regulated by the State Public Utilities Commission.
4. Federal or State pre-exempted activities. Any activity, to the extent regulation thereof has been pre-exempted by Federal or State law.
5. Pre-existing uses. Uses existing at the time of the effective date of the ordinance codified in this title, which are in compliance with all applicable standards in effect prior to adoption, and which are not otherwise operating as a nuisance in violation of Article 6 of Chapter 27 of Title 5.
6. Public health and safety activities. All transportation, flood control, and utility maintenance and construction operations conducted by government entities or utility companies at any time on public rights-of-way, and those situations that may occur on private property deemed necessary to serve the best interests of the public and to protect the public's health and well-being, including, but not limited to: debris and limb removal; removal of damaged poles and vehicles; removal of downed wires; restoring electrical service; repairing traffic signals; repair of water hydrants; repair of mains, gas lines, oil lines, and sewers; repair and maintenance of flood control and stormwater facilities; repair and maintenance of streets and sidewalks.
7. Ordinary municipal activities. Ordinary municipal activities conducted by the City or other entity having jurisdiction in the City, including, but not limited to: solid waste collection; street sweeping; operation, maintenance, and repair of water production, treatment, and distribution facilities; operation, maintenance, and repair of sewage treatment, collection, and distribution facilities; and vacuuming catch basins.

8. Public safety training activities. Training activities by fire, law enforcement, and public utility officials that cannot reasonably take place within the parameters of this section, including but not limited to training that involves: hydrant testing, pumping hose lays, running chain saws, operating power tools, demolition, vehicle noise, and use of generators.
9. Public celebrations. Public celebrations, holidays, or occasions generally celebrated, or public parades held under authorized permits; any sporting event or activity conducted under the direction and supervision of any public or private school.

According to Section 9.22.080(F), the following acts are a violation of Section 9.22.080:

1. Noise-related nuisances defined in Chapter 27 of Title 5. Violations of Article 6 of Chapter 27 of Title 5 pertaining to unlawful noise-related nuisances shall also be considered a violation of this section.
2. Construction noise. Construction activities shall be subject to the provisions of Section 5.27.604, which sets forth the permissible hours for construction activity. At all other times, no person shall operate, or cause to be operated, tools or equipment used in alteration, construction, demolition, drilling, or repair work so that the sound creates a noise disturbance across a residential property line, except for emergency work. Stationary equipment (e.g., generators) shall not be located adjacent to any existing residences unless enclosed in a noise attenuating structure, subject to the review and approval of the Director.
3. Places of public entertainment. Operating, playing, or allowing the operation or playing of a drum, musical instrument, phonograph, radio, sound amplifier, television, or similar device that produces, reproduces, or amplifies sound in a place of public entertainment at a sound level greater than 95 dBA (read by the slow response on a sound level meter) at any point that is normally occupied by a customer is prohibited, unless conspicuous signs are located near each public entrance, stating "Warning: Sound Levels Within May Cause Hearing Impairment."
4. Stationary nonemergency signaling devices. Sounding or allowing the sounding of an electronically amplified signal from a stationary bell, chime, siren, whistle, or similar device intended primarily for nonemergency purposes, from any place, for more than 10 consecutive seconds in any hourly period is prohibited.
5. Compacting mechanisms. Operating or allowing the operation of the compacting mechanism of any motor vehicle that compacts refuse and that creates, during the compacting cycle, a sound level more than 85 dBA when measured at 50 feet from any point of the vehicle is prohibited between the hours of 9:00 p.m. and 5:00 a.m.
6. Vehicle or motorboat repairs and testing. Repairing, rebuilding, modifying, or testing any motor vehicle, motorcycle, or motorboat in a manner as to cause a noise disturbance across property lines or within a noise-sensitive zone is prohibited.

According to Section 9.22.080(G), improvements to eliminate or reduce negative impacts between uses deemed violations of this section shall be provided by the new use, rather than the existing use.

9.22.100 Vibrations.

Uses that generate vibrations that may be considered a nuisance or hazard on any adjacent property shall be corrected, cushioned, or isolated to prevent the continued generation of vibrations. Uses shall be operated in compliance with the following provisions.

1. Not perceptible along property line. Uses shall not generate ground vibration that is perceptible without instruments by the average person at any point along or beyond the property line of the parcel containing the activities which generate the vibration.
2. No discomfort or annoyance. Uses, activities, and processes shall not generate ground vibration that causes discomfort or annoyance to reasonable persons of normal sensitivity or which endangers the comfort, health, or peace of residents whose property abuts the property lines of the subject parcel.
3. No interference. Uses shall not generate ground vibration that interferes with the operations of equipment and facilities on adjoining parcels.
4. Temporary construction exempt. Vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks) are exempt from the provisions of this section. (§ 2, Ord. 14-13, eff. October 8, 2014)

3.12.4 - Methodology

Construction Noise Analysis Methodology

A reasonable worst-case scenario was analyzed assuming each piece of modeled equipment would operate simultaneously at the nearest reasonable locations to the closest noise-sensitive receptor for the loudest phase of construction. Noise emission levels recommended by FHWA's Highway Construction Noise Handbook were used to ascertain the noise generated by specific types of construction equipment. The construction noise impact was evaluated in terms of whether there would be an increase in excess of the 8-hour average noise level of 80 dBA L_{eq} as measured at a receiving residential land use. Analysis requirements were based on the sensitivity of nearby receptors and the Noise Ordinance specifications.

Traffic Noise Modeling Methodology

The FHWA highway traffic noise prediction model (FHWA-RD-77-108) was used to evaluate traffic-related noise conditions in the vicinity of the SOI Expansion Area. Traffic data used in the model was obtained from the Traffic Impact Analysis (TIA) prepared for the proposed project.[6] The resultant noise levels were weighed and summed over a 24-hour period in order to determine the CNEL values. The FHWA-RD-77-108 model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level. Adjustments are then made to account for the roadway's active width (i.e., the distance between the center of the outermost travel lanes on each side of the roadway); the total Average Daily Traffic (ADT) and the percentage of ADT that flows during the day, evening, and night; the travel speed; the vehicle mix on the roadway; a percentage of

[6] Kittleson & Associates. 2024. Vista Ranch Transportation Impact Analysis. September.

the volume of automobiles, medium trucks, and heavy trucks; the roadway grade; the angle of view of the observer exposed to the roadway; and the site conditions ("hard" or "soft") as they relate to the absorption of the ground, pavement, or landscaping.

The level of traffic noise depends on the three primary factors: (1) the volume of the traffic, (2) the speed of the traffic, and (3) the number of trucks in the flow of traffic. Generally, the loudness of traffic noise is increased by heavier traffic volumes, higher speeds, and greater number of trucks. Vehicle noise is a combination of the noise produced by the engine, exhaust, and tires. Because of the logarithmic nature of traffic noise levels, a doubling of the traffic volume (assuming that the speed and truck mix do not change) results in a noise level increase of 3 dBA. Based on the FHWA community noise assessment criteria, this change is "barely perceptible." For reference, a doubling of perceived noise levels would require an increase of approximately 10 dBA. The truck mix on a given roadway also has an effect on community noise levels. As the number of heavy trucks increases and becomes a larger percentage of the vehicle mix, adjacent noise levels increase.

The model analyzed the noise impacts from the nearby roadways onto the project vicinity, which consists of the area that has the potential of being impacted from the on-site noise sources as well as the project-generated traffic on the nearby roadways. The roadways were analyzed based on a single-lane-equivalent noise source combining both directions of travel. A single-lane-equivalent noise source exists when the vehicular traffic from all lanes is combined into a theoretical single lane that has a width equal to the distance between the two outside lanes of a roadway, which provides almost identical results to analyzing each lane separately where elevation changes are minimal.

Stationary Noise Source Analysis Methodology

The proposed project would generate noise from new stationary sources, including mechanical equipment operations and parking lot activity. To provide a conservative analysis, the highest end of the range of reference noise levels for these stationary noise sources was used to calculate the reasonable worst-case hourly average noise levels from each noise source as measured at the nearest sensitive receptor. These noise levels were then compared to the City's applicable noise performance threshold to determine whether these noise sources would result in a substantial increase in excess of this standard.

Vibration Impact Analysis Methodology

The City does not have adopted criteria for construction or operational groundborne vibration impacts. Therefore, the FTA's vibration impact criteria and modeling and analysis methodology were utilized to evaluate potential vibration impacts. The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment Manual[7] and are summarized in Table 3.12-5 in the regulatory discussion above. A reasonable worst-case scenario was analyzed assuming the pieces of equipment

[7] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed October 21, 2025.

that would generate the highest groundborne vibration levels would operate at the nearest reasonable location to an off-site structure.

Cumulative Analysis Methodology

The geographic scope of the cumulative noise analysis is the impacts associated with the proposed project and the area surrounding the SOI Expansion Area.

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for construction, mobile, and stationary noise sources are limited to approximately 500 feet from the source. Noise impacts for airport-related noise sources are limited to the areas within an airport's 65 dBA CNEL noise contours.

Groundborne vibration impacts are also very localized. Therefore, potential cumulative impacts from groundborne vibration would be limited to 50 feet from the type of single event activity (such as temporary construction) that could occur with implementation of the proposed project. In addition, the only cumulatively considerable contribution to permanent or ongoing operational groundborne vibration conditions in the project vicinity would result from the introduction of new permanent sources of groundborne vibration to an existing impacted environment.

The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to noise and groundborne vibration. The analysis also considers whether incremental contributions of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. The analysis also considers the foreseeable development projects in the City and surrounding area that would be in close proximity to the SOI Expansion Area in addition to the proposed project. If there is no impact associated with respect to a particular California Environmental Quality Act (CEQA) threshold, the proposed project would not contribute to the cumulative condition and discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.12.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in CEQA Guidelines Appendix G Environmental Checklist to determine whether noise impacts resulting from the implementation of the proposed project would be considered significant if the proposed project would cause:

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 two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

3.12.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Substantial Noise Increase in Excess of Standards

Impact NOI-1:	**The proposed project would not generate 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.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres which would not receive any entitlements as part of this proposed project other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the proposed SOI Expansion and Non-development Area would not result in any substantial temporary or permanent increase in ambient noise levels. Accordingly, no impact would occur.

MP Area 2

Development of MP Area 2 would result in the removal of all existing uses and structures, followed by the future construction and operation of residential, mixed-use, and private community development, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, and other public and private uses. Potential temporary and permanent noise increase impacts are analyzed below.

Construction Noise Impacts

There are no site-specific development plans; however, implementation of MP Area 2 could result in the potential for construction noise to reach a relatively high single event resulting in temporary substantial increase in ambient noise levels in the vicinity of the proposed project in excess of established standards, potentially resulting in an intermittent noise nuisance that could result in annoyance or sleep disturbances at nearby sensitive receptors.

It should be noted that the Master Development Plan provides that the applicant would construct a wall between existing nearby residences and the MP Area 2 after grading and before further construction activities are performed. However, to ensure compliance with City standards, Mitigation Measure (MM) NOI-1a, which requires Best Management Practices (BMPs) and compliance with restricted hours of construction, will ensure that project construction activities would not result in a substantial temporary increase in noise levels that could result in annoyance or sleep disturbances at nearby sensitive receptors.

With implementation of MM NOI-1a, potential construction noise impacts would be reduced to less than significant.

Operational Noise Impacts

Mobile Source Noise Impacts

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the proposed project. The City does not define “substantial increase”; therefore, for the purpose of this analysis, a substantial increase is based on the following criteria. A characteristic of noise is that audible increases in noise levels generally refer to a change of 3 dBA or more as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a significant impact would occur if the proposed project would cause the traffic noise CNEL to increase by any of the following:

- 5 dBA or more if the resulting CNEL is considered clearly compatible or normally compatible for a receiving land use.
- 3 dBA or more if the resulting CNEL is considered normally incompatible for a receiving land use.
- 1 dBA or more if the resulting CNEL is considered clearly incompatible for a receiving land use.

For example, as shown in Table 3.12-7, noise levels of up to 65 dBA CNEL are considered normally compatible with new residential land use development; noise levels above 65 dBA CNEL and up to 70 dBA CNEL are considered normally incompatible with new residential land use development; and noise levels above 70 dBA CNEL are considered clearly incompatible with new residential land use development.

The FHWA highway traffic noise prediction model (FHWA-RD-77-108) was used to evaluate existing and future project-related traffic noise conditions along modeled roadway segments in the vicinity of the SOI Expansion Area. Near Term conditions traffic modeling was performed using the peak-hour study intersections traffic volume data provided by Peters Engineering Group for the proposed project, included in Appendix J. The resultant noise levels were weighed and summed over a 24-hour period to determine the CNEL values. The traffic noise modeling input and output files, including the 60 dBA, 65 dBA, and 70 dBA CNEL noise contour distances, are included in Appendix J. Table 3.12-10 shows a summary of the traffic noise levels for Near Term forecast traffic conditions without and with the

proposed project as measured at 50 feet from the centerline of the outermost travel lane. This modeled Near Term scenario assumes full buildout of the residential components of MP Area 1 and MP Area 2.

Table 3.12-10: Near Term Forecast Traffic Noise Levels Without and With Master Plan Area 1 and Area 2 Development

Roadway Segment	Near Term No Project CNEL (dBA)	Near term plus Project[1] CNEL (dBA)	Increase Over Without Project Condition (dBA)
Willow Avenue–International Avenue to Behymer Avenue	68.4	68.5	0.1
Willow Avenue–Behymer Avenue to Shepherd Avenue	70.1	70.5	0.4
Minnewawa Avenue–International Avenue to Behymer Avenue	67.1	68.6	1.5
Minnewawa Avenue–Behymer Avenue to Shepherd Avenue	67.4	68.3	0.9
Clovis Avenue–Shepherd Avenue to Nees Avenue	66.3	67.1	0.8
Clovis Avenue–Nees Avenue to Alluvial Avenue	67.1	67.7	0.6
Clovis Avenue–Alluvial Avenue to Herndon Avenue	69.0	69.3	0.3
Sunnyside Avenue–Shepherd Avenue to Nees Avenue	64.5	65.1	0.6
Sunnyside Avenue–Nees Avenue to Alluvial Avenue	65.4	66.1	0.7
Sunnyside Avenue–Alluvial Avenue to Herndon Avenue	67.0	67.5	0.5
Fowler Avenue–Shepherd Avenue to Teague Avenue	64.1	66.2	2.1
Fowler Avenue–Teague Avenue to Nees Avenue	66.4	68.4	2.0
Fowler Avenue–Nees Avenue to Alluvial Avenue	66.7	67.9	1.2
Fowler Avenue–Alluvial Avenue to SR-168 WB Ramps	67.6	68.4	0.8
Temperance Avenue–Shepherd Avenue to Nees Avenue	67.1	69.2	2.1
Temperance Avenue–Nees Avenue to Alluvial Avenue	68.1	69.8	1.7
Temperance Avenue–Alluvial Avenue to SR-168 WB Ramps	69.0	70.1	1.1
Locan Avenue–Shepherd Avenue to Nees Avenue	63.2	64.4	1.2
De Wolf Avenue–Shepherd Avenue to Owens Mountain Parkway	63.7	64.7	1.0
Behymer Avenue–Willow Avenue to Minnewawa Avenue	65.1	67.3	2.2
Behymer Avenue–Minnewawa Avenue to Fowler Avenue	67.9	69.6	1.7
Shepherd Avenue–Willow Avenue to Minnewawa Avenue	68.4	69.0	0.6

Roadway Segment	Near Term No Project CNEL (dBA)	Near term plus Project[1] CNEL (dBA)	Increase Over Without Project Condition (dBA)
Shepherd Avenue–Minnewawa Avenue to Clovis Avenue	66.8	68.2	1.4
Shepherd Avenue–Clovis Avenue to Sunnyside Avenue	66.7	68.9	2.2
Shepherd Avenue–Sunnyside Avenue to Fowler Avenue	67.1	70.0	2.9
Shepherd Avenue–Fowler Avenue to Temperance Avenue	67.1	68.6	1.5
Shepherd Avenue–Temperance Avenue to Locan Avenue	63.9	64.7	0.8
Shepherd Avenue–Locan Avenue to De Wolf Avenue	63.5	65.0	1.5
Shepherd Avenue–De Wolf Avenue to SR-168	62.0	62.4	0.4
Nees Avenue–Clovis Avenue to Sunnyside Avenue	68.3	68.8	0.5
Nees Avenue–Sunnyside Avenue to Fowler Avenue	65.5	66.3	0.8
Nees Avenue–Fowler Avenue to Temperance Avenue	64.4	65.4	1.0
Nees Avenue–Temperance Avenue to Locan Avenue	63.6	64.9	1.3
Alluvial Avenue–Clovis Avenue to Sunnyside Avenue	67.1	67.5	0.4
Alluvial Avenue–Sunnyside Avenue to Fowler Avenue	66.7	67.3	0.6
Alluvial Avenue–Fowler Avenue to Temperance Avenue	64.1	64.9	0.8
Herndon Avenue–SR-168 to Clovis Avenue	71.2	71.6	0.4
Herndon Avenue–Clovis Avenue to Sunnyside Avenue	70.6	71.1	0.5

Note:
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
Near Term = the scenario of the full buildout of the residential components of Master Plan (MP) Area 1 and MP Area 2.
SR = State Route
Source: FirstCarbon Solutions (FCS). 2025.

As shown in Table 3.12-10, all of the modeled roadway segments with noise levels below 65 dBA CNEL (i.e., normally compatible for new residential development), would experience increases in traffic noise that would be below the 5 dBA or greater increase that would be considered significant, and therefore the project impact to these roadway segments would be less than significant.

As shown in Table 3.12-10, there are several modeled roadway segments that are projected to experience traffic noise levels above 65 dBA CNEL and up to 70 dBA CNEL (i.e., normally incompatible for residential land use development). However, the results show that all project-related increases in traffic noise levels on these roadway segments would be less than 3 dBA and would, therefore, be a less than significant increase.

There are four modeled roadway segments that are projected to experience traffic noise levels above 70 dBA CNEL (i.e., clearly incompatible for new residential land use development). Three of these segments would all experience traffic noise increases of less than 1 dBA compared to conditions without the proposed project. Therefore, these project-related traffic noise increases would be less than significant.

Only one of these segments, the segment of Temperance Avenue from Alluvial Avenue to SR-168 west bound ramps would experience an increase of greater than 1 dBA, an increase of 1.1 dBA compared to conditions without the proposed project. However, the land uses adjacent to this roadway segment are all commercial retail and City office land uses (including a fire station). As shown in Table 3.12-7, noise levels of above 70 dBA CNEL and up to 75 dBA CNEL are considered normally incompatible with these types of land uses. Therefore, a 3 dBA or greater increase is considered a significant increase for this roadway segment. However, traffic noise would only increase by 1.1 dBA compared to conditions without the proposed project. Thus, traffic noise increases along this roadway segment would be less than significant.

Therefore, project-related traffic noise levels would not result in a substantial permanent increase in traffic noise levels in excess of applicable standards and would represent a less than significant impact.

Stationary Source Noise Impacts

A significant impact would occur if the proposed stationary source operational noise levels exceed the City's noise performance standard. The City's Noise Ordinance establishes maximum exterior noise standards for receiving residential land uses of 55 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 50 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). The City's Noise Ordinance also establishes a maximum interior noise standard standards for receiving residential land uses of 45 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 40 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). Furthermore, if the ambient noise level exceeds the resulting standard, the ambient shall be the standard.

Development projects that could occur with implementation of MP Area 2 would include new stationary noise sources. These stationary noise sources could involve a wide spectrum of uses and activities, including various commercial operations, agricultural production, school playgrounds, HVAC units, generators, lawn maintenance equipment, and swimming pool pumps. These would be potential point sources of noise that could affect noise-sensitive receptors in MP Area 2.

For example, current market-available residential mechanical ventilation systems have rated operational noise levels up to 70 dBA L_{eq} at a distance of 3 feet. Current market-available, commercial-grade mechanical ventilation systems have rated operational noise levels up to 80 dBA L_{eq} at 3 feet from the operating equipment.

Stationary noise sources could have operational noise levels that could exceed the City's noise performance thresholds if they were to occur in areas adjacent to sensitive receptor land uses.

Therefore, mitigation would be required to reduce this potential impact. Operational activity noise levels can be mitigated either at the source or at the receiving land use using setbacks, soundwalls, or acoustic-rated windows or by siting loading/parking areas on sides of buildings opposite sensitive receptors (using buildings as shielding).

For example, at a distance of 325 feet, unobstructed truck loading activity noise levels would attenuate to below 50 dBA L_{eq}. Similarly, at a distance of 90 feet, unshielded parking activity noise levels would attenuate to below 50 dBA L_{eq}. And at a distance of 30 feet, operational noise levels from unobstructed mechanical ventilation systems would attenuate to below 50 dBA L_{eq}.

To ensure these potential stationary source noise impacts would be reduced to less than significant, future development projects would be required to implement MM NOI-1b, which requires proposed development projects that include (1) unshielded parking areas within 90 feet, or (2) unshielded truck loading docks within 325 feet, or (3) unshielded mechanical ventilation equipment systems within 30 feet of a noise-sensitive receptor, to prepare a site-specific acoustic study which demonstrates that, with incorporation of sufficient noise attenuation features as needed, the project would meet the City's exterior/interior noise performance standards.

Therefore, implementation of MM NOI-1b, which stipulates preparation of a stationary source noise reduction plan to identify appropriate design measures, where required, would ensure stationary source operational noise impacts generated by future development projects within MP Area 2 would be reduced to less than significant.

Vista Ranch Development/MP Area 1

The proposed project would implement the Vista Ranch Development, which would develop approximately 368 acres of the MP Area with mixed uses. The proposed Vista Ranch Development would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities, as well as associated community amenities and commercial uses. Potential temporary and permanent noise increase impacts are analyzed below.

Construction Noise Impacts

For the purposes of this analysis, a significant impact would occur if construction activities would result in a substantial temporary increase in ambient noise levels outside of the City's permissible hours for construction that would result in annoyance or sleep disturbance of nearby sensitive receptors. Section 5.27.604 of the CMC addresses construction activities. This section sets the hours of construction 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, except that from June 1 through September 15, construction activity may start after 6:00 a.m. Monday through Friday.

While the City does not establish noise level thresholds for construction activities, this analysis uses the noise limits established by the FTA to identify the potential for impacts due to substantial temporary construction noise. The FTA identifies construction noise limits in the Transit Noise and

Vibration Impact Assessment Manual.[8] During daytime hours, a significant temporary increase would be an increase in excess of the 8-hour average noise level of 80 dBA L_{eq} as measured at a receiving residential land use.

Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site 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. 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. Impact equipment such as pile drivers would not be used during construction of the proposed project.

Construction of the proposed project would require the use of graders, excavators, dozers, front-end loaders, and backhoes. The maximum noise level generated by each bulldozer, excavator, and grader is 85 dBA L_{max} at 50 feet from this equipment. The maximum noise level generated by each front-end loader and backhoe is 85 dBA L_{max} at 50 feet from this equipment.

The closest noise-sensitive receptors to the construction footprint of MP Area 1 are single-family residences located west of the SOI Expansion Area, north of Perrin Road. The closest residence would be located approximately 30 feet from the acoustic center of construction where multiple pieces of heavy construction equipment would potentially operate simultaneously at the SOI Expansion Area. At this distance, worst-case construction noise levels could range up to approximately 88 dBA L_{eq} at the façade of the nearest sensitive receptor. These reasonable worst-case construction noise levels would only occur periodically throughout the day as construction equipment operates along the nearest project boundaries. Additionally, these noise levels would drop off at a rate of 6 dBA per doubling of distance as the equipment moves over the SOI Expansion Area. Therefore, the calculated reasonable worst-case 8-hour average noise level for construction, assuming construction equipment moves over the SOI Expansion Area, would be 80 dBA $L_{eq(8\text{-hour})}$ as measured at the nearest residential receptor. The calculation spreadsheet with detailed modeling assumptions is provided in Appendix J. Moreover, the Master Development Plan provides that the applicant would construct a wall between these residences and the MP Development Area after grading and before further construction activities are performed.

[8] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September. Website: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed October 21, 2025.

The calculated worst-case construction noise levels do not exceed the FTA's 80 dBA $L_{eq(8\text{-hour})}$ threshold as measured at the nearest residential receptors. Therefore, temporary or periodic noise from construction activities associated with the Vista Ranch Development would not result in a substantial increase in excess of established standards, and the impact would be less than significant.

Operational Noise Impacts

Mobile Source Noise Impacts

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the proposed project. As stated previously, for purposes of this analysis, a significant impact would occur if the proposed project would cause the traffic noise CNEL to increase by any of the following:

- 5 dBA or more if the CNEL is considered clearly or normally compatible for a receiving land use.
- 3 dBA or more if the CNEL is considered normally incompatible for a receiving land use.
- 1 dBA or more if the CNEL is considered clearly incompatible for a receiving land use.

As shown in Table 3.12-7, noise levels of up to 65 dBA CNEL are considered normally compatible with new residential land use development; noise levels above 65 dBA CNEL up to 70 dBA CNEL are considered normally incompatible with new residential land use development; and noise levels above 70 dBA CNEL are considered clearly incompatible with new residential land use development.

Table 3.12-10, shows a summary of the traffic noise levels for Near Term forecast traffic conditions without and with the proposed project as measured at 50 feet from the centerline of the outermost travel lane. This modeled Near Term scenario assumes full buildout of the residential components of MP Area 1 and MP Area 2.

As shown in the mobile source noise impact discussion for MP Area 2, above, with implementation of the proposed project, including full buildout of the residential components of both MP Area 1 and MP Area 2, all project-related traffic noise increase would be less than significant.

Therefore, project-related traffic noise levels would not result in a substantial permanent increase in traffic noise levels in excess of applicable standards and would represent a less than significant impact.

Stationary Source Noise Impacts

The proposed project would include new stationary noise sources, such as typical parking lot activities and mechanical ventilation systems. A significant impact would occur if the proposed parking lot or mechanical ventilation systems exceeded the City's noise performance standard. The City's Noise Ordinance establishes maximum exterior noise standards for receiving residential land uses of 55 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 50 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). The City's Noise Ordinance also

establishes a maximum interior noise standard for receiving residential land uses of 45 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 40 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). Furthermore, if the ambient noise level exceeds the resulting standard, the ambient shall be the standard.

The stationary noise sources associated with implementation of the Vista Ranch Development would be both residential and commercial mechanical ventilation systems and parking lot activities.

Parking Lot Activities

Typical parking lot activities include people conversing, doors shutting, and vehicles idling, which generate noise levels ranging from approximately 60 dBA to 70 dBA L_{max} at 50 feet. These activities are expected to occur sporadically throughout the day, as residents and visitors arrive and leave parking lot areas at the SOI Expansion Area.

The nearest noise-sensitive receptors to proposed parking areas are the single-family residential dwellings located south of the SOI Expansion Area, south of East Shepherd Avenue. Proposed parking areas could be located as close as 120 feet from this closest sensitive receptor. At this distance, assuming minimal shielding from the existing 6-foot concrete soundwalls around these nearest residential receptors, noise generated by typical parking lot activity would attenuate to below 45 dBA L_{eq} as measured at the exterior of this receptor. Minimum exterior-to-interior noise reduction for standard residential construction would reduce these noise levels to below 25 dBA L_{eq} as measured at the interior of this receptor. The calculation spreadsheet with the detailed modeling assumptions is included in Appendix J.

These noise levels would not exceed the City's exterior daytime or nighttime noise performance standards of 55 dBA and 50 dBA L_{eq}, respectively, for any 15-minute period, nor would they exceed the interior nighttime noise limit of 40 dBA L_{eq} as measured at the interior of the nearest receiving noise-sensitive land use. Furthermore, they would not exceed the existing measured ambient noise levels in this area, as shown in Table 3.12-4 to range from approximately 40 dBA to 67 dBA L_{eq} in the vicinity of these nearest receptors. Therefore, parking lot activity noise levels would not result in a substantial permanent increase in noise levels in excess of established standards and this impact would be less than significant.

Mechanical Equipment Operations

Typical operational noise levels for commercial-grade mechanical ventilation equipment systems (for larger commercial buildings) range up to approximately 78 dBA L_{eq} at a distance of 3 feet. Typical operational noise levels for residential-grade mechanical ventilation equipment systems range up to approximately 70 dBA L_{eq} at a distance of 3 feet.

The nearest noise-sensitive receptor to where proposed commercial-grade mechanical ventilation equipment could be located is the single-family residential dwelling located south of the SOI Expansion Area, south of East Shepherd Avenue. Mechanical ventilation equipment could be located approximately 135 feet from this closest sensitive receptor. At this distance, assuming minimal shielding from the existing 6-foot concrete soundwalls around these nearest residential receptors,

noise generated by typical rooftop mechanical ventilation equipment would attenuate to 26 dBA L_{eq}. Minimum exterior-to-interior noise reduction for standard residential construction would reduce these noise levels to 1 dBA L_{eq} as measured at the interior of this receptor. The calculation spreadsheet with the detailed modeling assumptions is included in Appendix J.

The nearest noise-sensitive receptor to proposed residential-grade mechanical ventilation equipment is a single-family residential dwelling located west of the SOI Expansion Area, north of Perrin Road. Residential mechanical ventilation equipment could be located approximately 35 feet from this closest sensitive receptor. At this distance, assuming no shielding, noise generated by typical residential mechanical ventilation equipment would attenuate to 38 dBA L_{eq}. Minimum exterior-to-interior noise reduction for standard residential construction would reduce these noise levels to 13 dBA L_{eq} as measured at the interior of this receptor. The calculation spreadsheet with the detailed modeling assumptions is included in Appendix J.

These noise levels would not exceed the City's exterior daytime or nighttime noise performance standards of 55 dBA and 50 dBA L_{eq}, respectively, for any 15-minute period, nor would they exceed the interior nighttime noise limit of 40 dBA L_{eq} as measured at the interior of the nearest receiving noise-sensitive land use. Furthermore, they would not exceed the existing measured ambient noise levels in this area, as shown in Table 3.12-4 to range from approximately 40 dBA to 67 dBA L_{eq} in the vicinity of these nearest receptors. Therefore, mechanical ventilation system activity noise levels would not result in a substantial permanent increase in noise levels in excess of established standards and this impact would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

MM NOI-1a Construction Noise Mitigation Plan

All of the following measures shall be implemented during construction. Prior to issuance of building permits, the following language shall be included, verbatim, in the general notes section of all the civil plan construction documents.

- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers which are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.

- At all times during project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the SOI Expansion Area.
- The construction contractor shall ensure that all on-site construction activities, including the operation of any tools or equipment used in construction, drilling, repair, alteration, grading, or demolition work, are limited to between the hours of 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, except that from June 1 through September 15, construction activity may start after 6:00 a.m. Monday through Friday.

MM NOI-1b Stationary Source Noise Reduction Plan

Prior to issuance of building permits, the property owner/developer shall implement the following measures to limit operational stationary noise source impacts:

- Any proposed development projects that include unshielded parking areas within 90 feet, or unshielded truck loading docks within 325 feet, or unshielded mechanical ventilation equipment systems within 30 feet of a noise-sensitive receptor, shall demonstrate compliance with the City of Clovis Municipal Code (CMC) Section 15-2506 by submitting a site-specific acoustic study. These reports shall demonstrate that the proposed project incorporates sufficient noise attenuation features, if needed, to meet the City's exterior/interior noise performance standards. The individual project owner/developer shall submit the acoustic study to the Planning Director, or their designee, for review and approval. Upon approval by the City, the proposed acoustical design features shall be incorporated into the proposed development. Noise reduction design features may include, but are not limited to, locating stationary noise sources on the site to be shielded by structures (buildings, enclosures, or sound walls) or by using equipment that has a quieter rating.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Construction Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for construction-related noise sources are limited to approximately 500 feet from the source. There are no major long-term development projects undergoing construction in MP Area 2 that would combine with the proposed project to result in a cumulative construction noise impact. In addition, as shown in the construction noise impact analysis above, with implementation of MM NOI-1a, project-related construction noise impacts would be reduced to less than significant. Therefore, the proposed project would not result in a potentially significant cumulatively considerable contribution to temporary construction noise levels in the project vicinity. This impact would be less than significant.

Operational Noise Impacts

Mobile Source Noise Impacts

The geographic scope cumulative traffic noise impacts is approximately 500 feet from the edge of any roadway segment that would carry a substantial portion of project traffic. For purposes of this cumulative traffic noise impact analysis, a significant impact would occur if the proposed project would cause the traffic noise levels to increase 1 dBA or more where the traffic noise levels without the proposed project are considered clearly incompatible for a receiving land use.

Cumulative traffic modeling was performed using the cumulative traffic volume data provided in the TIA prepared by Kittleson & Associates for the proposed project, included in Appendix K.[9]

The resultant noise levels were weighed and summed over a 24-hour period to determine the CNEL values. The traffic noise modeling input and output files, including the 60 dBA, 65 dBA, and 70 dBA CNEL noise contour distances, are included in Appendix J.

Table 3.12-11 shows a summary of the traffic noise levels for cumulative forecast traffic conditions, without and with the proposed project, as measured at 50 feet from the centerline of the outermost travel lane. This modeled cumulative scenario assumes full buildout of MP Area 1 and MP Area 2.

[9] Kittleson & Associates, 2024. Vista Ranch Transportation Impact Analysis. September.

Table 3.12-11: Cumulative Forecast Traffic Noise Levels Without and With the Proposed Project (Master Plan Area 1 and Area 2 Development)

Roadway Segment	Without Project CNEL (dBA)	With Project CNEL (dBA)	Increase Over Without Project Conditions (dBA)
Willow Avenue–International Avenue to Behymer Avenue	68.4	68.2	-0.2
Willow Avenue–Behymer Avenue to Shepherd Avenue	68.7	68.8	0.1
Minnewawa Avenue–International Avenue to Behymer Avenue	64.8	65.2	0.4
Minnewawa Avenue–Behymer Avenue to Shepherd Avenue	62.5	62.3	-0.2
Clovis Avenue–Shepherd Avenue to Nees Avenue	66.3	67.1	0.8
Clovis Avenue–Nees Avenue to Alluvial Avenue	67.4	67.4	0.0
Clovis Avenue–Alluvial Avenue to Herndon Avenue	68.7	68.5	-0.2
Sunnyside Avenue–Shepherd Avenue to Nees Avenue	64.6	65.6	1.0
Sunnyside Avenue–Nees Avenue to Alluvial Avenue	66.1	67.1	1.0
Sunnyside Avenue–Alluvial Avenue to Herndon Avenue	66.6	67.8	1.2
Fowler Avenue–Shepherd Avenue to Teague Avenue	66.5	67.1	0.6
Fowler Avenue–Teague Avenue to Nees Avenue	68.8	69.2	0.4
Fowler Avenue–Nees Avenue to Alluvial Avenue	67.6	67.5	-0.1
Fowler Avenue–Alluvial Avenue to SR-168 WB Ramps	67.9	67.9	0.0
Temperance Avenue–Shepherd Avenue to Nees Avenue	65.3	66.6	1.3
Temperance Avenue–Nees Avenue to Alluvial Avenue	66.5	67.2	0.7
Temperance Avenue–Alluvial Avenue to SR-168 WB Ramps	69.2	70.1	0.9
Locan Avenue–Shepherd Avenue to Nees Avenue	59.9	63.7	3.8
De Wolf Avenue–Shepherd Avenue to Owens Mountain Parkway	60.7	62.0	1.3
Behymer Avenue–Willow Avenue to Minnewawa Avenue	66.7	67.2	0.5
Behymer Avenue–Minnewawa Avenue to Fowler Avenue	67.4	68.4	1.0
Shepherd Avenue–Willow Avenue to Minnewawa Avenue	68.8	68.3	-0.5
Shepherd Avenue–Minnewawa Avenue to Clovis Avenue	67.4	67.0	-0.4
Shepherd Avenue–Clovis Avenue to Sunnyside Avenue	68.4	67.9	-0.5
Shepherd Avenue–Sunnyside Avenue to Fowler Avenue	66.5	65.5	-1.0
Shepherd Avenue–Fowler Avenue to Temperance Avenue	66.7	66.5	-0.2

Roadway Segment	Without Project CNEL (dBA)	With Project CNEL (dBA)	Increase Over Without Project Conditions (dBA)
Shepherd Avenue–Temperance Avenue to Locan Avenue	64.5	66.5	2.0
Shepherd Avenue–Locan Avenue to De Wolf Avenue	63.7	65.5	1.8
Shepherd Avenue–De Wolf Avenue to SR-168	65.6	65.9	0.3
Nees Avenue–Clovis Avenue to Sunnyside Avenue	68.4	69.4	1.0
Nees Avenue–Sunnyside Avenue to Fowler Avenue	65.4	66.1	0.7
Nees Avenue–Fowler Avenue to Temperance Avenue	64.7	65.5	0.8
Nees Avenue–Temperance Avenue to Locan Avenue	63.0	63.8	0.8
Alluvial Avenue–Clovis Avenue to Sunnyside Avenue	66.7	66.9	0.2
Alluvial Avenue–Sunnyside Avenue to Fowler Avenue	66.1	67.1	1.0
Alluvial Avenue–Fowler Avenue to Temperance Avenue	64.5	65.2	0.7
Herndon Avenue–SR-168 to Clovis Avenue	71.6	71.9	0.3
Herndon Avenue–Clovis Avenue to Sunnyside Avenue	70.5	70.8	0.3

Note:
CNEL = Community Noise Equivalent Level as measured at 50-feet from the centerline of the outermost travel lane
dBA = A-weighted decibel
SR = State Route
Source: FirstCarbon Solutions (FCS) 2025.

As shown in Table 3.12-10, there are only two modeled roadway segments that under cumulative no project conditions are projected to experience traffic noise levels that are considered clearly incompatible for new residential land use development (i.e., above 70 dBA CNEL). These two modeled roadway segments are Herndon Avenue from SR-168 to Clovis Avenue and Herndon Ave from Clovis Avenue to Sunnyside Avenue. Both of these segments would experience traffic noise increases of less than 1 dBA compared to conditions without the proposed project. Therefore, the proposed project would not result in a cumulatively considerable contribution to any cumulative impact. Thus, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to traffic noise impacts on modeled roadway segments. This impact would be less than significant.

Vista Ranch Development/MP Area 1

Construction Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for construction-related noise sources are limited to approximately 500 feet from the source. There are no major long-term

development projects undergoing construction in MP Area 1 that would combine with the proposed project to result in a cumulative construction noise impact. In addition, as shown in the construction noise impact analysis above, project-related construction noise impacts would not result in a substantial temporary increase in ambient noise levels as measured at the nearest sensitive receptors in the project vicinity. Therefore, the proposed project would not result in a potentially significant cumulatively considerable contribution to temporary construction noise levels in the project vicinity. This impact would be less than significant.

Operational Noise Impacts

Mobile Source Noise Impacts

The geographic scope cumulative traffic noise impact is approximately 500 feet from the edge of any roadway segment that would carry a substantial portion of project traffic. For purposes of this cumulative traffic noise impact analysis, a significant impact would occur if the proposed project would cause the traffic noise levels to increase 1 dBA or more where the traffic noise levels without the proposed project are considered clearly incompatible for a receiving land use.

As shown in the cumulative mobile source noise impact discussion for MP Area 2, above, there are only two modeled roadway segments that, under cumulative no project conditions, are projected to experience traffic noise levels that are considered clearly incompatible for new residential land use development (i.e., above 70 dBA CNEL). These two modeled roadway segments are Herndon Ave from SR-168 to Clovis Avenue and Herndon Ave from Clovis Avenue to Sunnyside Avenue. Both of these segments would experience traffic noise increases of less than 1 dBA compared to conditions without the proposed project. Therefore, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to traffic noise impacts on modeled roadway segments. This impact would be less than significant.

Stationary Source Noise Impacts

The geographic scope of the cumulative noise analysis is limited by the range of potential noise impacts. Noise impacts tend to be localized; therefore, noise impacts for stationary noise sources are limited to approximately 500 feet from the source.

As described in the Existing Noise Levels discussion above, existing ambient noise levels surrounding the SOI Expansion Area range from 40.7 dBA to 67.4 dBA L_{eq}. The City's General Plan established a maximum of 60 dBA CNEL for residential land uses. The City's Noise Ordinance establishes maximum exterior noise standards for receiving residential land uses of 55 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 50 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). The City's Noise Ordinance also establishes a maximum interior noise standard for receiving residential land uses of 45 dBA L_{eq} (for a 15-minute period) for daytime hours (7:00 a.m. to 10:00 p.m.) and of 40 dBA L_{eq} (for a 15-minute period) for nighttime hours (10:00 p.m. to 7:00 a.m.). Furthermore, if the ambient noise level exceeds the resulting standard, the ambient shall be the standard. Existing ambient noise levels range from 40.7 dBA to 67.4 dBA L_{eq}, which in turn means that ambient noise levels are the standard.

Therefore, existing ambient noise levels are considered normally acceptable for nearby land uses and do not constitute a cumulative noise impact. Since there is not a cumulative stationary source noise impact in the project vicinity, implementation of the proposed project would result in a less than significant cumulative impact related to stationary source noise. In addition, as shown in the analysis above, combined noise levels from stationary noise source operations would attenuate to below 57 dBA CNEL and 48 dBA L_{eq} at the nearest off-site residential receptors. These noise levels would not be audible above existing ambient noise levels as measured at the nearest sensitive receptors. Therefore, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to stationary source noise impacts in the project vicinity. This impact would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Less than cumulatively considerable contribution.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution.

Mitigation Measures

None.

Groundborne Vibration/Noise Levels

Impact NOI-2:	**The proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres in the City's SOI, including the approximately 507-acre MP Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres which would not receive any entitlements as part of this proposed project other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. The proposed SOI Expansion and Non-development Area would not generate groundborne vibration or noise. Therefore, no impact would occur.

MP Area 2

Development of MP Area 2 would result in the removal of all existing uses and structures, followed by the future construction and operation of residential, mixed-use, and private community development, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, and other public and private uses. Potential construction and operational groundborne vibration impacts are analyzed below.

Construction Vibration Impacts

A significant impact would occur if the project construction activities would generate groundborne vibration levels in excess of established construction vibration damage criteria as measured at existing structures in the project vicinity.

Section 9.22.100 of the CMC specifically exempts temporary construction-related vibration impacts from vehicles leaving a subject parcel and does not establish other thresholds for construction-related groundborne vibration impacts. Therefore, for purposes of this analysis, the FTA's vibration impact criteria are utilized. The FTA has established industry accepted standards for vibration impact assessment in its Transit Noise and Vibration Impact Assessment Manual. These guidelines are summarized in Table 3.12-5.

There are no site-specific development plans; however, project development in MP Area 2 could result in the potential for construction vibration levels from future development projects to exceed the FTA's damage threshold criteria for receiving structures. As a result, mitigation would be required to reduce this potential impact.

Implementation of a measure that prohibits the use of heavy vibration-generating construction equipment within 30 feet of adjacent residential buildings; that requires the use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 30 feet of off-site structures; that requires the use of static compaction mode when compacting materials within 15 feet of residential buildings; that prohibits dropping heavy equipment; and that requires the use of alternative methods for breaking up existing pavement, such as a pavement grinder, within 30 feet of adjacent residential buildings, would reduce construction vibration impacts to well below the FTA's threshold of 0.2 in/sec PPV for structures of nonengineered timber and masonry construction.

For example, a large vibratory roller is the piece of equipment that could be expected to operate on the SOI Expansion Area that would produce the highest vibration levels. The reference vibration level for a large vibratory roller is 0.210 in/sec PPV at 25 feet. At a distance of 30 feet, the resulting vibration level would be reduced to 0.159 in/sec PPV. Thus restricting this type of equipment from operating within 30 feet of a structure would reduce impacts to less than significant.

To reduce this potential impact, future development would be required to implement MM NOI-2. This measure requires prohibiting the use of heavy vibration-generating construction equipment within 30 feet of adjacent residential buildings; using a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 30 feet of off-site structures; only using the static compaction mode when compacting materials within 15 feet of residential buildings; prohibiting dropping heavy equipment and use alternative methods for breaking up existing pavement, such as a pavement grinder, within 30 feet of adjacent residential buildings; and designating a person responsible for registering and investigating claims of excessive vibration.

Therefore, implementation of MM NOI-2, which requires preparation of a Construction Vibration Reduction Plan for any nearby structure, would ensure that these vibration level impacts generated by future development projects would be reduced to a less than significant impact.

Operation Vibration Impacts

A significant impact would occur if the project operational activities would generate groundborne vibration levels in excess of established operational vibration impact criteria as measured at existing receptors in the project vicinity.

The City's standards for operational vibration impacts are contained in Section 9.22.100 of the CMC, which prohibits the generation of ground vibration that is perceptible without instruments by the average person at any point along or beyond the property line of the parcel containing the activities which generate the vibration. Furthermore, the City prohibits uses, activities, and processes from generating ground vibration that causes discomfort or annoyance to reasonable persons of normal sensitivity or which endangers the comfort, health, or peace of residents whose property abuts the property lines of the parcel containing the activities which generate the vibration, or from generating ground vibration that interferes with the operations of equipment and facilities on adjoining parcels.

Based on the proposed types of land uses of the MP Area 2, future related development projects are not anticipated to include any permanent sources of vibration that would expose persons in the project vicinity to excessive groundborne vibration levels and development consistent with the proposed project would reduce the total amount of development in MP Area 2 compared to what was contemplated by the General Plan. In addition, there are no existing significant permanent sources of groundborne vibration located within the MP Area 2 to which future development projects would be exposed. Therefore, project operational groundborne vibration level impacts would be considered less than significant.

Vista Ranch Development/MP Area 1

The proposed project would implement the Vista Ranch Development, which would develop approximately 368 acres of the Master Plan Area with mixed uses. The proposed Vista Ranch Development would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities. Potential construction and operational groundborne vibration and noise impacts are analyzed below.

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. Groundborne noise is generated when vibrating building components radiate sound, or noise, generated by groundborne vibration. In general, if groundborne vibration levels do not exceed levels considered to be perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

Construction Vibration Impacts

A significant impact would occur if the project construction activities would generate groundborne vibration levels in excess of established construction vibration damage criteria as measured at existing structures in the project vicinity.

As noted previously, the City does not establish quantitative thresholds for construction-related groundborne vibration impacts. Therefore, for purposes of this analysis, the FTA's vibration impact criteria are utilized. The FTA has established industry-accepted standards for vibration impact assessment in its Transit Noise and Vibration Impact Assessment Manual. These guidelines are summarized in Table 3.12-5.

Of the variety of equipment used during construction, the large vibratory rollers anticipated to be used in the site preparation phase of construction would produce the greatest groundborne vibration levels. Large vibratory rollers produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The nearest off-site receptors are the single-family residences located west of the SOI Expansion Area, with the closest façades being approximately 30 feet from the nearest construction footprint where large vibratory rollers would potentially operate. At this distance, groundborne vibration levels could range up to 0.1 PPV from operation of a large vibratory roller. This is below the FTA's construction vibration damage criteria of 0.2 PPV for this type of structure buildings of nonengineered timber and masonry construction. Thus, project construction activities would not generate groundborne vibration levels in excess of the FTA's criteria and impacts would be considered less than significant as measured at the nearest receiving structures in the project vicinity.

Operation Vibration Impacts

A significant impact would occur if the project operational activities would generate groundborne vibration levels in excess of established operational vibration impact criteria as measured at existing receptors in the project vicinity.

The City's standards for operational vibration impacts are contained in Section 9.22.100 of the CMC, which prohibits the generation of ground vibration that is perceptible without instruments by the average person at any point along or beyond the property line of the parcel containing the activities which generate the vibration. Furthermore, the City prohibits uses, activities, and processes from generating ground vibration that causes discomfort or annoyance to reasonable persons of normal sensitivity; or that endangers the comfort, health, or peace of residents whose property abuts the property lines of the parcel containing the activities which generate the vibration; or that interferes with the operations of equipment and facilities on adjoining parcels.

Implementation of the proposed project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. In addition, there are no existing significant permanent sources of groundborne vibration in the project vicinity. Therefore, project

operational activities would not generate excessive groundborne vibration levels as measured at the nearest receptors and the impact would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

MP Area 2

MM NOI-2 The following measures shall be implemented where vibration levels due to construction activities would exceed 0.2 inch per second (in/sec) peak particle velocity (PPV) at nearby buildings to reduce the impact to a less than significant level:

- Prohibit the use of heavy vibration-generating construction equipment within 30 feet of adjacent residential buildings.
- Use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 30 feet of off-site structures. Only use the static compaction mode when compacting materials within 15 feet of residential buildings.
- Prohibit dropping heavy equipment and use alternative methods for breaking up existing pavement, such as a pavement grinder, within 30 feet of adjacent residential buildings.
- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Construction-related groundborne vibration impacts are very localized; therefore, only areas within approximately 50 feet of a construction site could potentially be affected by groundborne vibration resulting from construction activities. There are no long-term development projects undergoing construction in the project vicinity that would combine with the proposed project to result in a cumulative groundborne vibration impact. Since there is not a cumulative groundborne vibration impact in the MP Area 2 vicinity, implementation of the proposed project would result in a less than

significant cumulative impact related to construction groundborne vibration. In addition, as shown in the impact discussion above, potential project construction-related groundborne vibration impacts would be reduced to less than significant with implementation of MM NOI-2. Therefore, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to construction vibration impacts in the project's vicinity and this impact would be less than significant.

In addition, implementation of the proposed project would not include any permanent sources of vibration that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the vicinity of the SOI Expansion Area. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to vibration conditions in the project vicinity. This impact would be less than significant.

Vista Ranch Development/MP Area 1

Construction-related groundborne vibration impacts are very localized; therefore, only areas within approximately 50 feet of a construction site could potentially be affected by groundborne vibration resulting from construction activities. There are no long-term development projects undergoing construction in the project vicinity that would combine with the proposed project to result in a cumulative groundborne vibration impact. Since there is not a cumulative groundborne vibration impact in the project vicinity, implementation of the proposed project would result in a less than significant cumulative impact related to construction groundborne vibration. In addition, as shown in the impact discussion above, potential project construction-related groundborne vibration impacts would be less than significant without mitigation. Therefore, implementation of the proposed project would not result in a potentially significant cumulatively considerable contribution to construction vibration impacts in the proposed project's vicinity and this impact would be less than significant.

In addition, implementation of the proposed project would not include any permanent sources of vibration that could expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the vicinity of the SOI Expansion Area. Therefore, implementation of the proposed project would not result in a cumulatively considerable contribution to vibration conditions in the project vicinity. This impact would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Excessive Noise Levels from Airport Activity

Impact NOI-3: **The proposed project would not expose people residing or working in the project area to excessive noise levels for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion would not result in physical development and as such would not expose people residing or working in the project area to excessive noise levels 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 2miles of a public airport or public use airport. As such, no impact would occur.

MP Area 2

The Fresno Yosemite International Airport is located approximately 6.2 miles southwest of MP Area 2. At this distance, the entirety of MP Area 2 is located outside of the airport's 60 dBA CNEL noise contours. Therefore, implementation of the proposed project would not expose persons residing or working in MP Area 2 to noise levels from airport activity that would be in excess of normally acceptable standards. Therefore, no impact would occur.

Vista Ranch Development/MP Area 1

As explained above, the Fresno Yosemite Airport is approximately 6.2 miles southwest of MP Area 1. At this distance, the entirety of MP Area 1 is located outside of the 60 dBA CNEL airport noise contours of the nearest airport. While aircraft noise is occasionally audible in MP Area 1 from aircraft flyovers, aircraft noise associated with nearby airport activity would not expose people residing or working near MP Area 1 to excessive noise levels. Therefore, implementation of the proposed project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development and no impact would occur.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

Cumulative Analysis

No impacts would occur with respect to airport noise impacts as a result of the proposed project; accordingly, the proposed project would not contribute to any cumulative impact and would not result in a cumulative impact.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: No impact.
Vista Ranch Development/MP Area 1: No impact.

Mitigation Measures

None.

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3.13 - Population and Housing

3.13.1 - Introduction

This section describes existing population and housing in the region, City of Clovis (City), and project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to population and housing that could result from implementation of the proposed project. Information included in this section is based, in part, on databases and reports maintained by the City, the County of Fresno (County), and the California Department of Finance (CDF).

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to population and housing.

- Comment requesting that the Revised Draft EIR account for new teachers and staff in its population and housing analysis. (p. 3.13-9)
  - See Section 3.14, Public Services, for additional information regarding schools.
- Comment requesting the Revised Draft EIR provide analysis to show how the substantial population growth may affect the City of Fresno. (pp. 3.13-8 to 3.13-13)
- Comment(s) stating concern about the increase of population and states the Sphere of Influence (SOI) Expansion Area has been left open as a buffer and opposes development near the dam. (pp. 3.13-8 to 3.13-13)
  - See Section 3.9, Hazards and Hazardous Materials, and Section 3.10, Hydrology and Water Quality, for more information related to the dam.

3.13.2 - Environmental Setting

Population

City of Clovis

The City experienced a population increase from 2000 to 2010, from 68,516 persons to 95,631 persons, resulting in an increase of 27,115 persons, or approximately 39.6 percent, as shown in Table 3.13-1. During the period from 2010 to 2025, the population continued to increase in the City, resulting in a total estimated population of 127,674 persons in 2025, or an increase of approximately 33.5 percent.[1,2]

[1] California Department of Finance (CDF). 2012. E-4 Population Estimates for Cities, Counties, and the State, 2001–2010, with 2000 & 2010 Census Counts. Website: https://dof.ca.gov/forecasting/demographics/estimates/estimates-e4-2000-2010/. Accessed April 10, 2025.

[2] California Department of Finance (CDF). 2024. E-4 Population Estimates for Cities, Counties, and the State, 2021–2024 with 2020 Census Benchmark. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2024-with-2020-census-benchmark/. Accessed April 10, 2025.

Table 3.13-1: Population Growth in Clovis

Year	Population	Change	Percent Change
2000	68,516	—	—
2010	95,631	27,115	39.6%
2025	127,674	32,043	33.5%

Notes:
All values are approximate.
Source: California Department of Finance (CDF). 2025

According to the most recent CDF estimate, the City has an average number of persons per household of 2.81.[3]

Growth Projections

Fresno Council of Government (Fresno COG) produced population projections from 2022 to 2060 for the City's SOI.[4] Fresno COG estimates that the City's SOI would have a population of 157,380 persons in 2060 compared to a population 126,960 persons in 2022, a change of 30,420 persons, representing an annual growth rate of 0.6 percent.

SOI Expansion Area

There are approximately 70 existing residential units within the SOI Expansion Area. Using the CDF's most recent estimate of 2.81 persons per household, approximately 197 people currently reside within the SOI Expansion Area. Residential structures are located primarily within the proposed project's Non-development Area.

Housing

City of Clovis

Table 3.13-2 summarizes the growth of the City's housing stock between 2000 and 2025. The number of housing units increased from approximately 25,265 in 2000 to approximately 35,306 in 2010, representing an increase of approximately 10,041 housing units, or approximately 39.7 percent.

[3] California Department of Finance (CDF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020–2024. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed April 10, 2025.

[4] Fresno Council of Governments (Fresno COG). 2024. Fresno County 2023–2060 Growth Projections. October 17. Website: https://www.fresnocog.org/wp-content/uploads/2023/11/2024-Fresno-COG-2023-2060-Growth-Projections-REPORT.pdf. Accessed May 15, 2025.

During the period from 2010 to 2025, the number of housing units increased by approximately 11,990, for a total of approximately 47,296 units, or approximately 33.9 percent.[5,6]

Table 3.13-2: Housing Unit Growth in Clovis

Year	Housing Units	Change	Percent Change
2000	25,265	–	–
2010	35,306	10,041	39.7%
2025	47,296	11,990	33.9%

Notes:
All values are approximate.
Source: California Department of Finance (CDF). 2025

Growth Projections

Fresno COG produced housing unit projections from 2022 to 2060 for the City's SOI.[7] Fresno COG estimates that the City's SOI would have a demand of 12,700 new units between 2022 and 2060, which would consist of 10,740 single-family units and 1,960 multi-family units.

SOI Expansion Area

There are approximately 70 existing residential units within the SOI Expansion Area, primarily within the Non-development Area.

Affordable Housing

Regional Housing Needs Allocations

Every jurisdiction is assigned a set number of housing units to accommodate through the Regional Housing Needs Allocation (RHNA), which projects the housing need for the whole region. Fresno COG, a regional planning agency, is responsible for distributing the RHNA to each jurisdiction within the County. Fresno COG adopted the 2023-2031 Final Regional Housing Needs Plan 6th Cycle on November 17, 2022.[8]

[5] California Department of Finance (CDF). 2012. E-8 Historical Population and Housing Estimates for Cities, Counties, and the State, 2000–2010. Website: https://dof.ca.gov/forecasting/demographics/estimates/estimates-e8-2000-2010/. Accessed April 10, 2025.

[6] California Department of Finance (CDF). 2024. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020–2024. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2024/. Accessed April 10, 2025.

[7] Fresno Council of Governments (Fresno COG). 2024. Fresno County 2023–2060 Growth Projections. October 17. Website: https://www.fresnocog.org/wp-content/uploads/2023/11/2024-Fresno-COG-2023-2060-Growth-Projections-REPORT.pdf. Accessed May 15, 2025.

[8] Fresno Council of Governments (Fresno COG). 2022. 6th Cycle Regional Housing Needs Plan. November 17. Website: https://www.fresnocog.org/wp-content/uploads/2022/11/FCOG_RHNP_Public_Review_Final_November_2022_Compiled.pdf. Accessed May 12, 2025.

City of Clovis

The City received the following RHNA allocations at various levels of income affordability as shown in Table 3.13-3 below. As shown in the table, during the January 31, 2023, to January 31, 2031, planning period, the City must ensure the availability of adequate residential sites to accommodate 8,977 dwelling units across all income levels.[9]

Table 3.13-3: City of Clovis 2023-2031 Final RHNA Allocations

Jurisdiction	Very Low (0 to 50 percent of median income)	Low (51 to 80 percent of median income)	Moderate (81 to 120 percent of median income)	Above Moderate (Over 120 percent of median income)	Total
Clovis	2,926	1,549	1,448	3,054	8,977
Source: Fresno Council of Governments (Fresno COG). November 2022.					

SOI Expansion Area

The SOI Expansion Area does not currently contain any affordable housing units.

Employment

City of Clovis

The California Employment Development Department (EDD) estimated that in March 2025, the City had 59,300 employed persons and 2,600 unemployed persons, for an unemployment rate of 4.2 percent within the City.[10] Fresno COG projects the City's SOI to grow from 40,550 jobs to 51,050 jobs between 2022 and 2060, an increase of 10,500 jobs.[11]

SOI Expansion Area

The SOI Expansion Area contains employment-generating uses, such as offices, an abandoned Contractors Corp Yard, and a small abandoned tree nursery.

[9] Fresno Council of Governments (Fresno COG). 2022. 6th Cycle Regional Housing Needs Plan. November 17. Website: https://www.fresnocog.org/wp-content/uploads/2022/11/FCOG_RHNP_Public_Review_Final_November_2022_Compiled.pdf. Accessed May 12, 2025.

[10] California Employment Development Department (EDD). 2025. Monthly Labor Force Data for Cities and Census Designated Places. Website: https://labormarketinfo.edd.ca.gov/file/lfmonth/fresnsub.xls. Accessed May 12, 2025.

[11] Fresno Council of Governments (Fresno COG). 2024. Fresno County 2023–2060 Growth Projections. October 17. Website: https://www.fresnocog.org/wp-content/uploads/2023/11/2024-Fresno-COG-2023-2060-Growth-Projections-REPORT.pdf. Accessed May 15, 2025.

3.13.3 - Regulatory Framework

Federal

There are no applicable federal regulations, plans, or policies pertaining to population and housing that are applicable to the proposed project.

State

California Housing Element Law

The State Housing Element Law (Government Code Chapter 1143, Article 10.6, §§ 65580 and 65589) requires each city and county to adopt a general plan for future growth. This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. The amount of housing that must be accounted for in a local housing element is determined through a process called the RHNA. In the RHNA process, the State gives each region a number representing the amount of housing needed, based on existing need and expected population growth.

At the State level, the California Department of Housing and Community Development (HCD) estimates the relative share of the State's anticipated population growth that would occur in each county in the State based on CDF population projections and historic growth trends. Where there is a regional council of governments, as in Fresno County (in this case, the Fresno COG), the HCD provides the regional housing need to the council. The council then assigns a share of the regional housing need to each of its cities and counties. The process of assigning shares provides cities and counties the opportunity to comment on the proposed allocations. The HCD oversees the process to ensure that the council of governments distributes its share of the State's projected housing need.

Each city and county must update its general plan housing element on a regular basis pursuant to the requirements of Government Code Section 65580, *et seq.* Among other things, the housing element must incorporate policies and identify potential sites that would accommodate a city's share of the regional housing need. Before adopting an update to its housing element, a city or county must submit the draft to the HCD for review. The HCD will advise the local jurisdiction whether its housing element complies with the provisions of California Housing Element Law. The regional councils of governments are required to assign regional housing shares to the cities and counties within their region on a similar schedule. At the beginning of each cycle, the HCD provides population projections to the regional councils of governments, who then allocate shares to their cities and counties. The shares of the regional need are allocated before the end of the cycle so that the cities and counties can amend their housing elements by the deadline.

Local

City of Clovis General Plan

The General Plan policies related to population and housing that are applicable to the proposed project are identified below:[12]

Housing Element

Policy 1.1 Provide adequate sites for new housing development through appropriate planned use designations, zoning, and development standards to accommodate the regional housing needs for the 2013-2023 planning period.

Policy 1.2 Facilitate development of new housing for all economic segments of the community, including extremely low, very low-, low-, moderate-, and above moderate income households.

Policy 1.6 Promote development of higher-density housing, mixed-use, and transit-oriented development in areas located along major transportation corridors and transit routes served by the necessary infrastructure.

Policy 1.7 Ensure the adequate provision of water, sewer, storm drainage, roads, public facilities, and other infrastructure necessary to serve new housing.

Policy 1.8 Approve new housing in accordance with design standards that will ensure the safety, quality, integrity, and attractiveness of each housing unit.

Policy 1.9 Encourage development around employment centers that provides the opportunity for local residents to live and work in the same community by balancing job opportunities with housing types.

Policy 2.7 Work to ensure that local policies and standards do not act to constrain the production of affordable housing units.

3.13.4 - Methodology

Impacts related to population, housing, and employment and data on existing and forecasted growth at the regional, County, and City levels were analyzed using a variety of reports and databases provided by the Fresno COG, the CDF, and the City of Clovis Housing Element. The proposed project's impacts were evaluated by calculating the approximate population growth and housing units generated by the proposed project to determine whether the estimated growth in population and housing would remain consistent with the General Plan and established RHNA in the Housing Element and the City of Clovis Municipal Code (CMC).

[12] City of Clovis. 2014. City of Clovis General Plan. August 26. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

Growth Inducement

Based on the California Environmental Quality Act (CEQA) Guidelines, growth inducement is any growth that exceeds the planned growth of an area and results in new development that would not have taken place without the implementation of the project. A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved the construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (*Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App.4th 342). Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply or wastewater treatment/collection in an area where this service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

The timing, magnitude, and location of land development and population growth in a region are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and nonresidential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in the State.

Cumulative Analysis

The geographic scope of the cumulative population and housing analysis is the City. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to population and housing. The analysis also considers whether incremental contribution of impacts associated with

the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.13.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to population and housing are significant environmental effects. The proposed project would have a potentially significant effect if it would:

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.

3.13.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Population Growth

Impact POP-1:	**The proposed project would not 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).**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan Area and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that have not requested and would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the proposed SOI Expansion and Non-development area would not induce substantial unplanned population growth in an area, either directly or indirectly. Therefore, no impacts would occur.

MP Area 2

Direct Population Growth

Master Plan (MP) Area 2 proposes housing that would result in direct population growth. MP Area 2 includes up to 568 residential units.[13] Using the most recent CDF estimate for the average number of persons per household in the City of 2.81, the addition of 568 housing units could increase the City's population by approximately 1,596 persons. Fresno COG completed growth projections through 2060 accounting for each city's long-term development capacity based on adopted general plans.

Based on Fresno COG's projections for the City, the population is anticipated to be 142,490 in 2035 and 157,380 in 2060. As such, the anticipated increase of 1,596 persons resulting from implementation of the proposed Master Plan would account for approximately 1.1 percent of the City's forecasted growth in 2035 and approximately 1.0 percent of the City's forecasted growth in 2060. Growth related to the proposed development within MP Area 2 has already been factored into anticipated and forecasted growth within the City, and the relatively small portion of growth resulting from implementation of MP Area 2 would not result in substantial unplanned growth in the City. As such, effects from MP Area 2 would result in a less than significant impact related to direct population growth, and no mitigation would be required.

Indirect Population Growth

The proposed Master Plan requires adjustments to the land uses within MP Area 2. The proposed General Plan land use designation for MP Area 2 is Mixed Use Village. The Mixed Use Village land use designation would allow for the development of a master planned community through multiple zoning designations, including the Master Plan Community Overlay District. Adjustments to the land uses in MP Area 2 would include the modification of the boundaries of General Plan Focus Area 13. The proposed modification to the original boundaries of the City of Clovis General Plan Focus Area 13 would memorialize the 507-acre Master Plan Area as a subarea of Focus Area 13 (Chapter 2, Project Description, Exhibit 2-7). This application is not intended to eliminate the greater Focus Area 13 established under the General Plan; rather, it would create a new Focus Area designation (Focus Area 13a) to establish and refine specific development goals and policies for this portion of Focus Area 13.

Projects that include employment-generating uses have the potential to result in indirect population growth through the creation of jobs or the extension of infrastructure into areas that were not previously served. As noted in Chapter 2, Project Description, the proposed Master Plan contemplates a pre-zoning request for MP Area 2 to the following City zone districts: Single-Family Residential (R-1), Single-Family Medium Density (R-1-MD), Neighborhood Commercial (C-1), and Light Manufacturing (M-1). Uses within the M-1and C-1 zones would create jobs, as envisioned by the City. The planned elementary school on a site zoned R-1-MD would also create jobs. In addition, the proposed infrastructure improvements would be adequately sized to serve the proposed Master Plan only. The proposed infrastructure would not be oversized to accommodate any growth beyond

[13] The approximately 19-acre school site within MP Area 2 could be developed with either 118 single-family residences or an elementary school. For the purposes of the Population and Housing analysis, the use of 118 single-family residences provides the most conservative evaluation for population generated by the proposed project.

the Master Plan Area into areas that were not previously served. While the development of MP Area 2 would result in growth, it is not anticipated to significantly induce unplanned growth. Implementation of MP Area 2 would not result in significant unplanned growth and impacts would be less than significant. No mitigation would be required.

Vista Ranch Development/MP Area 1

Construction

Impacts related to inducement of population growth are limited to operational impacts. No respective construction impacts would occur.

Operation

Direct Population Growth

The Vista Ranch Development proposes housing that would result in direct population growth. The proposed Vista Ranch Development includes the addition of up to 2,718 residential units. Using the most recent CDF estimate for the average number of persons per household in the City of 2.81, the addition of 2,718 housing units could increase the population of the City by an estimated 7,637 persons. Fresno COG completed growth projections through 2060 to assist with updating the 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), accounting for each city's long-term development capacity based on adopted general plans.

Based on Fresno COG's projections for the City, the population is anticipated to be 142,490 in 2035 and 157,380 in 2060. As such, the anticipated increase of 7,637 persons resulting from the proposed Vista Ranch Development would result in approximately 5.3 percent of the City's forecasted growth in 2035 and approximately 4.8 percent of the City's forecasted growth in 2060. Growth related to the proposed Vista Ranch Development has already been factored into anticipated and forecasted growth within the City, and the relatively small portion of growth resulting from implementation of the proposed Vista Ranch Development would not result in substantial unplanned growth in the City. As such, effects from the proposed Vista Ranch Development would result in a less than significant impact related to direct population growth and no mitigation would be required.

Indirect Population Growth

The proposed Vista Ranch Development requires adjustments to the land uses within MP Area 1. The proposed General Plan land use designation for MP Area 1 is Mixed Use Village. The Mixed Use Village land use designation would allow for the development of a master planned community through multiple zoning designations, including the Vista Ranch Development Community Overlay District. Adjustments to the land uses in MP Area 1 would include the modification of the boundaries of General Plan Focus Area 13. As previously discussed, the proposed modification to the original boundaries of the City of Clovis General Plan Focus Area 13 would memorialize the 507-acre Master Plan Area as a subarea of Focus Area 13. This application is not intended to eliminate the greater Focus Area 13 established under the General Plan; rather, it would create a new Focus Area designation (Focus Area 13a) to establish and refine specific development goals and policies for this portion of Focus Area 13.

Projects that include employment-generating uses have the potential to result in indirect population growth through the creation of jobs or the extension of infrastructure into areas not previously served. As noted in Chapter 2.0, Project Description, the proposed Vista Ranch Development contemplates a pre-zoning request for MP Area 1 to the following City zone districts: R-1, R-1-MD, R-2, R-4, C-1, C-R, and O. Uses within the C-1, and C-R zones would create jobs, as envisioned by the City. In addition, the proposed infrastructure improvements would be adequately sized to serve the proposed Vista Ranch Development only. The proposed infrastructure would not be oversized to accommodate any growth beyond MP Area 1 into areas that were not previously served. While the proposed Vista Ranch Development would result in growth, it is not anticipated to significantly induce growth. Implementation of the proposed Vista Ranch Development would not result in significant unplanned growth and impacts would be less than significant. No mitigation would be required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects located in the City would have the potential to result in a cumulative impact if, in combination, they would conflict with or obstruct implementation of the City's General Plan. Similarly, individual projects that are inconsistent with the regional planning documents upon which the General Plan is based would have the potential to result in cumulative impacts if they represent population growth beyond regional projections. As of 2025, the City was estimated to have a population of 127,674 persons. Cumulative projects in conjunction with the proposed project would add population consistent with planning projections. As such, the anticipated increase of 1,596 persons resulting from implementation of MP Area 2 would account for approximately 1.1 percent of the City's forecasted growth in 2035 and approximately 1 percent of the City's forecasted growth in 2060. The other residential projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1, as well as other relevant cumulative projects as required by CEQA, would develop up to 11,127 residential units. Using the CDF's average number of persons per household of 2.81 persons per household, cumulative projects listed in Table 3-1 are estimated to generate up to 31,267 persons or approximately 20 percent of the planned 2060 population. While the proposed project in conjunction with projects listed in Table 3-1 are anticipated to induce growth, the proposed project along with cumulative projects would not exceed forecasted growth populations for 2035 and 2060. As such, the

proposed project, in conjunction with other cumulative projects, would result in a less than significant cumulative impact associated with unplanned direct population growth.

The proposed infrastructure would not be oversized to accommodate any growth beyond MP Area 2 of the Master Plan Area into areas that were not previously served. While MP Area 2 would result in growth, it is not anticipated to significantly induce unplanned growth. Future development of MP Area 2 would not result in significant unplanned growth. As such, the proposed project, in conjunction with other cumulative projects, would result in a less than significant cumulative impact associated with direct or indirect population growth. Therefore, cumulative impacts related to population growth, both direct and indirect, would be considered less than significant. Moreover, the proposed project's incremental contribution to the less than significant impact would not be cumulatively considerable.

Vista Ranch Development/MP Area 1

As of 2025, the City was estimated to have a population of 127,674. Cumulative projects in conjunction with the proposed project would add population consistent with planning projections. As such, the anticipated increase of 7,637 persons resulting from implementation of the proposed Vista Ranch Development would result in approximately 5.3 percent of the City's forecasted growth in 2035 and approximately 4.8 percent of the City's forecasted growth in 2060. The other residential projects listed in Table 3-1, as well as other relevant cumulative projects as required by CEQA, would develop up to 11,127 residential units. Using the CDF's average 2.81 persons per household, cumulative projects listed in Table 3-1 are estimated to generate up to 31,267 persons, or approximately 20 percent, of the planned 2060 population. While the projects listed in Table 3-1 in conjunction with proposed project are anticipated to induce growth, the proposed Vista Ranch Development along with cumulative projects would not exceed forecasted growth populations for 2035 and 2060. The proposed infrastructure would not be oversized to accommodate any growth beyond MP Area 1 into areas that were not previously served. While the proposed Vista Ranch Development would result in growth, it is not anticipated to significantly induce unplanned growth. Implementation of the proposed Vista Ranch Development would not result in significant unplanned growth. As such, the proposed project, in conjunction with other cumulative projects, would result in a less than significant cumulative impact associated with direct and unplanned direct or indirect population growth. Therefore, cumulative impacts related to population growth, both direct and indirect, would be considered less than significant. Moreover, the proposed project's incremental contribution to the less than significant impact would not be cumulatively considerable.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Housing Displacement/Replacement Housing

Impact POP-2: **The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Accordingly, the proposed SOI Expansion and Non-development Area would not displace substantial numbers of existing people or housing. As such, no impact would occur.

MP Area 2

Presently, the Master Plan Area consists of a combination of fallow and grazing land, several rural residences, offices, and a mini-storage facility. Development of MP Area 2 of the proposed Master Plan would increase housing in the area by up to 568 residential units. Currently, MP Area 2 contains approximately four residential units. As such, and due to the small number of existing residences and the proposed rezoning from an agricultural zoning district to a residential zoning district, MP Area 2 of the proposed Master Plan would not displace substantial numbers of people or existing housing. As previously discussed, MP Area 2 of the proposed Master Plan would increase the number of residential units in the area by up to 568 residential units. Therefore, the development of MP Area 2 would have less than significant impacts related to the displacement of substantial numbers of people or existing housing, and no mitigation would be required.

Vista Ranch Development/MP Area 1

Presently, MP Area 1 consists of a combination of fallow and grazing land, several rural residences, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. Implementation of the proposed Vista Ranch Development would increase housing in the area by up to 2,718 residential units. Currently, MP Area 1 contains approximately four residences. As such, and because of the small number of existing residences, the proposed Vista Ranch Development would not displace substantial numbers of people or existing housing. Therefore, the proposed Vista Ranch Development would have less than significant impacts related to the displacement of substantial numbers of people or existing housing, and no mitigation would be required.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects listed in Table 3-1 in conjunction with the proposed development of MP Area 2 would add residential units to the City. The proposed development of MP Area 2, in conjunction with the listed projects, would not displace the housing units or people within the City. In fact, implementation of the cumulative projects would result in a net increase of housing in the City. Therefore, cumulative impacts associated with population and housing displacement would be less than significant.

The Master Plan Area consists of a combination of fallow and grazing land, several rural residences, offices, and a mini-storage facility. Implementation of MP Area 2 would increase housing in the area by up to 568 residential units. As such, and because the proposed project would result in a net increase of residential units, the proposed development of MP Area 2 would not displace substantial numbers of people or existing housing. Therefore, impacts related to this topic would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

Cumulative projects listed in Table 3-1 in conjunction with the proposed Vista Ranch Development would add residential units to the City. The proposed Vista Ranch Development, in conjunction with the listed projects, would not displace the housing units or people within the City. In fact, implementation of the cumulative projects would result in a net increase of housing in the City. Therefore, cumulative impacts associated with population and housing displacement would be less than significant.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impact would not be cumulatively considerable. MP Area 1 consists of a combination of fallow and grazing land, several rural residences, an abandoned Contractor's Corp Yard, and a small abandoned tree nursery. Implementation of the Vista Ranch Development would increase housing in the area by up to 2,718 residential units. As such, and because of the small number of existing residences, the proposed Vista Ranch Development would not displace substantial numbers of people or existing housing. In fact, the proposed Vista Ranch Development would add 2,718 housing units to the City. As such, impacts related to this topic would result in a less than cumulatively considerable contribution.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.14 - Public Services

3.14.1 - Introduction

This section describes the existing conditions related to public services in the City of Clovis (City) and project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to public services that could result from project implementation of the proposed project. Descriptions and analysis in this section are based on information provided by California Department of Finance (CDF), the Clovis Police Department (CPD), the Clovis Fire Department (CFD), Fresno County Library, the Clovis Unified School District (CUSD), and the Clovis Public Utilities Department.

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to public services.

- Comment stating the proposed project, at a minimum, would need a new elementary school and would require technical studies within the Master Plan Area. (pp. 3.14-21 to 3.14-24)
- Comment providing student generation rates and requesting that the City identify the maximum number of each residential units type to determine the number of students generated by the proposed project. (pp. 3.14-21 to 3.14-24)
- Comment stating that the proposed project would require that CUSD hires approximately 75 new teachers and staff. (pp. 3.14-21 to 3.14-24)
- Comment requesting that the Revised Draft EIR identify the schools that would reach capacity due to the proposed project and consider CUSD's ability to fund all necessary improvements to accommodate the proposed project. (pp. 3.14-21 to 3.14-24)
- Comment providing a list of schools that would potentially be impacted, the current enrollment, and the campus capacity. (pp. 3.14-21 to 3.14-24)
- Comment(s) requesting the Revised Draft EIR thoroughly disclose, analyze, and mitigate the proposed project's impacts to public resources and existing communities. (pp. 3.14-13 to 3.14-32)

3.14.2 - Environmental Setting

Fire Protection and Emergency Medical Services

City of Clovis

The CFD is responsible for providing fire suppression, technical rescue, hazardous materials spill/release mitigation, Emergency Medical Services (EMS), life safety and enforcement services, and emergency preparedness for the City. This responsibility includes the following functions: fire protection; EMS; urban search and rescue; high angle, trench, water, and confined space rescue; hazardous condition mitigation; strategic planning; administration; fire cause and origin investigations;

code enforcement; public education; emergency preparedness; and disaster response and coordination. These responsibilities are distributed through three divisions: Emergency Operations, Community Risk Reduction, and Administration, which also consist of three auxiliary bureaus.[1]

As of 2023, CFD staff consisted of 70 sworn professional firefighters, fire engineers, fire officers, chief officers, fire inspectors, and administrative staff. The minimum staffing per shift is 19 sworn personnel, consisting of one battalion office, six captains, six engineers, and six firefighters (one chief officer, one truck company, and five engine companies). Fire and emergency services are provided to approximately 124,000 residents within the CFD's approximately 26 square mile service area.[2]

Fire Stations

There are currently six fire stations in operational use in the City in addition to the CFD Headquarters, located at 1233 Fifth Street, and the CFD Training Center, located at 3455 Lind Avenue. The CFD fire stations and locations are listed below.[3]

- Station 1–633 Pollasky Avenue
- Station 2–2300 Minnewawa Avenue
- Station 3–555 North Villa Avenue
- Station 4–2427 Armstrong Avenue
- Station 5–790 North Temperance Avenue
- Station 6–2388 Encino Avenue

Response and Activity Statistics

Response and activity statistics in the City for 2022 through 2024 are detailed in Table 3.14-1.

Table 3.14-1: Response and Activity Statistics in the City of Clovis

Incident Type	2022	2023	2024	3-year Average
Emergency Medical	7,844	7,859	8,019	7,907
Good Intent/Service Call	2,487	2,941	3,106	2,845
Fire	433	863	710	669
Hazardous Materials/Explosion	200	178	155	178
Rescues and Vehicle Accidents	437	553	556	515
False Alarm % False Calls	614	848	885	782
Source: Clovis Fire Department (CFD). 2024. 2024 Annual Report.				

[1] City of Clovis. 2025. About Clovis FD. Website: https://clovisca.gov/services/fire/about/index.php. Accessed May 2, 2025.

[2] Ibid.

[3] Clovis Fire Department (CFD). 2023. 2023 Annual Report. Website: https://cms2.revize.com/revize/clovis/documents/Services/Fire/About/SOC%20Annual%20Report/2023-Annual-Report.pdf. Accessed May 2, 2025.

SOI Expansion Area

There are no fire protection facilities currently located on the SOI Expansion Area. The SOI Expansion Area is currently within the jurisdiction of the Fresno County Fire Department. The Fresno County Fire Department is responsible for fire protection services at the SOI Expansion Area, and its closest station is located approximately 1.55 miles south of the SOI Expansion Area.

Police Protection

City of Clovis

Police protection services in the City are provided by the CPD. The CPD operates out of its headquarters located at the Clovis Civic Center at 1233 Fifth Street. As of 2022, the CPD had 109 sworn officers, serving a community of approximately 124,000 citizens. As of 2022, the CPD reached their service rating goal of more than 90 percent, with an overall approval rating of 93 percent. Based on this data, the service ratio is approximately 0.88 police officers per 1,000 residents. In 2022, CPD's goal for responding to a Priority 1 call was 5 minutes, and this goal was achieved, as the average response time was 4.15 minutes.[4]

Organization

The CPD is organized into two major divisions (Field Services Division and Support Services), which are composed of eight budgetary sections: Patrol Division; Planning and Neighborhood Services; Communications; Investigations; Youth Services; Support Services; Administrative Services; and Animal Shelter.[5] The Patrol Division primarily responds to calls for service and represents the CPD in their daily contact with the citizens of the City.

Crime Statistics

CPD classifies calls for service as Priority 1, Priority 2 or Priority 3. Priority 1 calls are calls where a threat is posed to life or a crime of violence. Priority 2 calls are calls for service where there is an urgency or suspicious behavior. Priority 3 calls are calls for service where no emergency or serious problem is involved. From 2022 to 2023, there was a decrease in Priority 1 call levels of 10 percent, an increase in Priority 2 call levels of 4.1 percent, and an increase in Priority 3 call levels. The top 10 incident types increased in 2023 from 2022, except the alarm call type.[6]

Until 2022, CPD used the Federal Bureau of Investigation's (FBI) Uniform Crime Reporting (UCR) program to share and gather statistics and crime data. In 2022, the FBI required the use of the National Incident-Based Reporting System (NIBRS) instead of the UCR program, and CPD accordingly made the switch to NIBRS in 2022. The primary difference between the UCR program

[4] Clovis Police Department (CPD). 2022. Report to the Community. Website: https://cms2.revize.com/revize/clovis/documents/Services/Police/TD_CPD_Report-to-the-Community_2022_DRAFT-1.pdf. Accessed May 2, 2025.

[5] City of Clovis. 2014. 2014 Master Service Plan Update. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning/Master%20Service%20Plan/2014-Master-Service-Plan.pdf. Accessed May 2, 2025.

[6] Clovis Police Department (CPD). 2023. End of Year Report. Website: https://police.cityofclovis.org/wp-content/uploads/2024/06/FINAL-2023-Annual-Report-3.pdf. Accessed May 22, 2025.

and NIBRS is that the UCR only counts the highest and worst crimes, and the NIBRS counts all crimes. The majority of crimes committed in the City consist of property crimes, primarily theft, followed by drug offenses and simple assault. While there was an increase in those crimes from 2021 to 2022, there was a marked decrease in serious crimes, such as murder/nonnegligent manslaughter, arson, and rapes, during the same period.

SOI Expansion Area

There are no police or sheriff facilities currently located on the SOI Expansion Area. The SOI Expansion Area is currently within the jurisdiction of the Fresno County Sheriff. The Fresno County Sheriff's Office is responsible for police services at the SOI Expansion Area and the nearest station is located approximately 7.95 miles south of the SOI Expansion Area.

School Services

City of Clovis

The City and its Sphere of Influence (SOI) lie primarily within the CUSD. Only a small portion of the southwest area of the City lies in the Fresno Unified School District (FUSD). A small portion of the southeast area of the City's SOI lies within the Sanger Unified School District (SUSD). These districts are affected by residential growth in the City's area.

The CUSD provides school services for grades Transitional Kindergarten (TK) through 12 throughout most of the City, 20 percent of the City of Fresno, and a small portion of unincorporated Fresno County. As of 2025,the CUSD serves approximately 200 square miles and more than 43,669 students at 47 comprehensive schools in seven areas.[7,8] CUSD manages growth by financing new facilities through bonds, development fees, and State school funding.[9]

As of the 2023/2024 school year, the schools serving CUSD had a total enrollment of approximately 42,274 students, of which 22,434 were enrolled in elementary (K–6), 6,873 were enrolled in intermediate school (grades 7–8) and 12,967 were enrolled in high school (grades 9–12).[10] This total does not include students in CUSD's education service schools, online attendance or alternative programs.

SOI Expansion Area

There are no school facilities currently located on the SOI Expansion Area. The SOI Expansion Area is currently within the boundary of the CUSD. The SOI Expansion Area is within the Clovis North High

[7] Clovis Unified School District (CUSD). 2025. 2025 Report to the Community. Website: https://www.cusd.com/annual-report-to-the-community. Accessed November 5, 2025.

[8] Clovis Unified School District (CUSD). 2025. Clovis Unified At-A-Glance. Website: https://www.cusd.com/cusd-at-a-glance. Accessed November 5, 2025.

[9] City of Clovis. 2014. 2014 Master Service Plan Update. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning/Master%20Service%20Plan/2014-Master-Service-Plan.pdf. Accessed May 2, 2025.

[10] California Department of Education, DataQuest. 2024. 2023–24 Enrollment by Grade. Clovis Unified Report (10-62117). Website: https://dq.cde.ca.gov/dataquest/dqcensus/enrgrdlevels.aspx?agglevel=District&year=2023-24&cds=1062117. Accessed May 6, 2025.

School boundary (approximately 2.37 miles northwest), the Granite Ridge Intermediate School boundary (approximately 2.27 miles northwest), and the Riverview Elementary School boundary (approximately 2.47 miles west).

Parks

City of Clovis

The General Services Department oversees City of Clovis Recreation, which provides a range of services for residents and visitors, such as youth and adult programs, senior services, transit, and other Clovis Recreation programs, including the City of Clovis Batting Cages, Clovis Rotary Skatepark, adult slow-pitch softball at Clovis Rotary Park, and the youth and adult programs at the Clovis Recreation Center.[11,12] The Parks Division falls under the direction of the Public Utilities Department and is overseen by a full-time Parks Manager with a staff of approximately 20 employees. The goal of the Parks Division is to maintain recreational facilities, streetscape, parks, trails, and other landscaped open space areas, City trees, and building grounds.[11]

The City of Clovis Parks division maintains approximately 610 acres of City parks and landscaping, consisting of 94 parks totaling 182 acres; 340 acres of green belts, street gardens, and landscaped median islands; 100 acres of trails; 6 acres of building grounds; 11 acres of undeveloped park land and miscellaneous public right-of-way property; and approximately 42,000 City street trees. Four City parks are jointly maintained by a homeowner's association (HOA). These parks range from passive (Dry Creek Trailhead and Cottonwood) to active (Rotary and Sierra Bicentennial) and are a mix of smaller pocket parks to larger basin parks. All parks are classified as either Pocket Park, Neighborhood Park, Area Park, Community Park, Regional Park, School Park, or Basin Park based on the parks' standards outlined by the City. In addition to these facilities, the City maintains over 28.1 miles of trails. These trails consist of four primary trails (Clovis Old Town Trail, Dry Creek Trail, Enterprise Trail, and Pacific Gas and Electric Company [PG&E] Trail), as well as a series of greenbelt paths in the northeast corner of the City and paseos in the southeast. The City also has a successful joint-use agreement with CUSD that allows for use of school recreational facilities by City residents outside of school hours. These facilities provide numerous athletic fields, gymnasiums, and swimming pools for public use.[12]

SOI Expansion Area

There are no park facilities currently located on the SOI Expansion Area. The closest park is Deauville East Park located approximately 0.39 mile south of the SOI Expansion Area.

[11] City of Clovis. 2025. Recreation. Website: https://www.clovisca.gov/services/recreation.php. Accessed October 15, 2025.

[12] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

Library Services

City of Clovis

Library services are provided by Fresno County and funded by the County General Fund and countywide sales tax override. The Fresno County Public Library Clovis Regional Library branch (Clovis branch) is located in the Clovis Civic Center (1155 Fifth Street). New library facilities are proposed for inclusion in each of the Urban Villages outlined in the 1993 General Plan Update.[13]

The Fresno County Public Library provides collections and services through its Central Resource Library and 34 branches. It is part of the San Joaquin Valley Library System (SJVLS), a cooperative network of 10 public library jurisdictions in the counties of Fresno, Kern, Kings, Madera, Mariposa, Merced and Tulare.[14]

The Clovis branch is 8,627 square feet and is open to the public seven days a week; from 9:00 a.m. to 9:00 p.m. Mondays through Thursdays, 9:00 a.m. to 5:00 p.m. Fridays and Saturdays, and 12:00 p.m. to 5:00 p.m. on Sundays.

SOI Expansion Area

There are no library facilities currently located on the SOI Expansion Area. The closest library is the Clovis branch located approximately 3.12 miles southeast of the SOI Expansion Area.

Regulatory Framework

Federal

Fire Protection and Emergency Response Protection

The International Fire Code (IFC) is a model code that establishes minimum requirements for fire prevention and fire protection systems using prescriptive and performance-related provisions, founded on broad-based principles that make possible the use of new materials and new designs. The IFC is used in a variety of ways in both the private and public sectors and are the basis of laws and regulations in communities across the U.S. and internationally. The IFC contains regulations to safeguard life and property from fires and explosion hazards. Topics include general precautions, emergency planning and preparedness, fire department access and water supplies, automatic sprinkler systems, fire alarm systems, special hazards, and the storage and use of hazardous materials. The IFC also extends into non-regulatory settings to establish voluntary compliance programs, such as those promoting sustainability, energy efficiency and disaster resistance, best management practices, and other risk management activities.[15]

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[13] City of Clovis. 2014. 2014 Master Service Plan Update. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Service%20Plan/2014-Master-Service-Plan.pdf?t=202507181312520. Accessed May 2, 2025.

[14] Fresno County Public Library. 2025. About the Library. Website: https://www.fresnolibrary.org/about/index.html. Accessed May 6, 2025.

[15] International Code Council. 2021. 2021 International Fire Code. Website: https://codes.iccsafe.org/content/IFC2021P2. Accessed October 15, 2025.

State

California Fire Code

The 2022 California Fire Code (CFC) contains regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and explosion; dangerous conditions arising from the storage, handling and use of hazardous materials and devices; and hazardous conditions in the use or occupancy of buildings or premises. The CFC also contains provisions to assist emergency response personnel, and fire safety-related building standards are referenced in other parts of California Code of Regulations Title 24. The 2022 CFC is fully integrated into the 2021 IFC.

California Health and Safety Code

State fire regulations are set forth in the California Health and Safety Code, Division 12, Sections 13000 *et seq*. This includes regulations for building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and child care facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with California Code of Regulations Title 8 Section 1270 "Fire Prevention" and Section 6773 "Fire Protection and Fire Equipment" of the California Occupational Safety and Health Administration (Cal/OSHA) have established minimum standards for fire suppression and EMS. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Senate Bill 50

California Senate Bill (SB) 50 (funded by Proposition 1A, approved in 1998) limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development, and provides instead for a standardized developer fee. SB 50 generally provides for a 50/50 State and local school facilities funding match. SB 50 also provides three levels of statutory impact fees. The application level depends on whether State funding is available, whether the school district is eligible for State funding, and whether the school district meets certain additional criteria involving bonding capacity, year-round school, and the percentage of movable classrooms in use.

California Government Code, Section 65995(b) and Education Code, Section 17620

SB 50 amended Section 65995 of the California Government Code, which contains limitations on Section 17620 of the Education Code, the statute that authorizes school districts to assess development fees within school district boundaries. Section 65995(b)(3) of the Government Code requires the maximum square footage assessment for development to be increased every 2 years, according to inflation adjustments. On January 22, 2014, the State approved increasing the allowable amount of statutory school facilities fees (Level I School Fees) from $3.20 to $3.36 per square foot of assessable space for residential development of 500 square feet or more, and from $0.51 to $0.54 per square foot of chargeable covered and enclosed space for commercial/industrial development. School districts may levy higher fees if they apply to the State and meet certain conditions.

Developer Fees are utilized to enhance and maintain existing facilities; they are also put toward construction and expansion of new facilities. The CUSD adopted Level I and II School Facilities (Developer) Fees of $5.17 (Level I) and $5.86 (Level II) per square foot. The 2023 CUSD School Facilities Needs Analysis found that CUSD can justify charging a Level II fee of $5.86 per square foot for residential development, which is an increase of $0.69 per square foot, as compared to the Level I fee.[16]

Quimby Act

The Quimby Act (California Government Code § 66477) states that "the legislative body of a city or county may, by ordinance, require the dedication of land or impose a requirement of the payment of fees in lieu thereof, or a combination of both, for park or recreational purposes as a condition to the approval of a tentative or parcel map." Requirements of the Quimby Act apply only to the acquisition of new parkland and do not apply to the physical development of new park facilities or associated operations and maintenance costs. The Quimby Act seeks to preserve open space needed to develop parkland and recreational facilities; however, the actual development of parks and other recreational facilities is subject to discretionary approval and is evaluated on a case-by-case basis with new residential development. The City collects impact fees at the time of building permits and final maps that include both capital impacts and land acquisition.

Local

City of Clovis General Plan

The General Plan includes several policies relevant to public services identified below:[17]

Land Use Element

Policy 6.1 **Amendment criteria.** The City Council may approve amendments to the General Plan when the City Council is satisfied that the following conditions are met:

A. The proposed change is and will be fiscally neutral or positive.
B. The proposed change can be adequately served by public facilities and would not negatively impact service on existing development or the ability to service future development.
C. The proposed change is consistent with the Urban Village Neighborhood Concept when within an Urban Center.
D. General Plan amendments proposing a change from industrial, mixed-use business campus, or office (employment generating) land use designations to non-employment-generating land use designation shall be accompanied by an analysis of the potential impacts on the City's current and long-term jobs-housing ratio, as well as an evaluation on the change or loss in the types of jobs.

[16] Clovis Unified School District (CUSD). 2025. Developer Fees. Website: https://cusd.com/developer-fees. Accessed May 6, 2025.

[17] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

E. This policy does not apply to:
   i. County designations within the Clovis Planning Area or changes made by the City Council outside of the sphere boundary to reflect changes made by the County of Fresno.
   ii. Changes initiated by public agencies (such as school districts, flood control) for use by public agencies.
   iii. Changes initiated by the City within a specific plan.

Public Facilities and Services Element

Policy 1.1 **New development**. New development shall pay its fair share of public facility and infrastructure improvements.

Policy 1.4 **Development-funded facilities.** The City may require developments to install on-site or off-site facilities that are in excess of a development's fair share. However, the City shall establish a funding mechanism for future development to reimburse the original development for the amount in excess of the fair share costs.

Policy 3.4 **Joint use of facilities**. Partner with public and private educational institutions to jointly use facilities for both civic and educational purposes.

Policy 4.4 **Recreation programs.** Provide and/or sponsor recreational programs and services that are accessible and affordable to residents of all ages and abilities and encourage active and healthy living.

Policy 5.9 **Proximity to emergency medical services**. Require senior care facilities and other services providers that may need frequent emergency medical services to locate in proximity to fire stations and medical service providers.

Policy 6.1 **Fire and Police Service.** Maintain staffing, facilities, and training activities to effectively respond to emergency and general public service calls.

Policy 6.2 **Resource allocation.** Periodically conduct service level studies to analyze crime and emergency service performance data, to evaluate the effectiveness of prevention and reduction strategies, and to allocate resources accordingly.

Policy 6.3 **Emergency medical calls.** Explore options to lessen the demand on fire and police services or expand reimbursement programs to ensure the service pays for measured impacts.

Policy 6.5 **Public safety hot spots.** Prioritize improvement and enforcement activities to minimize existing and prevent future public safety hot spots. Reevaluate siting and development standards for facilities that generate high demands for service calls.

Policy 6.8 **Emergency preparedness planning.** Maintain an emergency operations plan, an emergency operations center, and a hazard mitigation plan to prepare for actual or threatened conditions of disaster or extreme peril.

Environmental Safety Element

Policy 1.5 **Critical and public facilities.** Locate and design critical and public facilities to minimize their exposure and susceptibility to flooding, seismic and geological effects, fire, and explosions. Ensure critical use facilities (e.g., hospital, police, and fire facilities) can remain operational during an emergency.

Policy 1.6 **Public information and emergency preparedness**. Provide the public with accurate and reliable information regarding natural hazards to prevent and mitigate potential risks and exposure for life and property. Continue to maintain a local hazard mitigation plan and conduct programs to inform the general public of the City's emergency preparedness and disaster response procedures.

Open Space and Conservation Element

Policy 1.1 **Parkland standard.** Provide a minimum of 4 acres of public parkland for every 1,000 residents.

Policy 1.3 **New parks and recreation facilities**. Provide a variety of parks and recreation facilities in underserved and growing areas of the community.

Policy 1.4 **Joint use of education facilities.** Provide a balanced system of parks and recreation facilities through joint use of facilities owned by school districts.

Policy 1.5 **Multipurpose open space.** Design public facilities as multipurpose open space and recreation to serve the community's infrastructure needs while preserving and enhancing open space and water features. Prioritize the use of existing basins for existing areas, and for future areas prioritize the development of separate park facilities available year-round.

Policy 1.7 **Sustainability**. Develop new and maintain existing parks and recreation facilities to achieve fiscal and environmental sustainability.

Policy 1.8 **Funding.** Require new development to provide pocket and neighborhood parks, dedicate land for area parks, and pay impact fees for community and regional parks. Require new development to establish lighting and landscape maintenance districts to fund operations and maintenance.

City of Clovis Municipal Code

The City receives funds for the provision of public services through development impact fees, property taxes, general funds, and grants. As land is developed within and annexed into the City, these fees apply as outlined in the City of Clovis Municipal Code (CMC). The City periodically reviews these fee structures to ensure that they provide adequate financing to cover the ongoing provision of City services, determine the correct level of adjustment required, and ensure funding for needed

infrastructure going forward. The City is responsible for continual oversight to ensure that the fee structures are adequate.[18]

CMC Chapter 3.4, Park Acquisition and Development, establishes a method for coordinated acquisition and development of City park facilities. This Chapter states that any residential project shall pay parks acquisition and development fees per dwelling unit.

Title 4 of the CMC is dedicated to Public Safety. The purposes of Chapter 4.2, Emergency Services, are to provide for the preparation and carrying out of plans for the protection of persons and property within the City in the event of an emergency; the direction of the Emergency Organization; and the coordination of the emergency functions of the City with all other public agencies, corporations, organizations, and affected private persons. Chapters 4.3 and 4.4 pertain to Fire Department and Fire Prevention. Chapter 4.4 codifies the adoption of the CFC. Chapter 4.10, Fire Facility Development Impact Fee, requires that any owner/developer who constructs or causes a dwelling unit or a "dwelling unit equivalent" to be constructed in the City shall pay a fire department fee in addition to any other fees required to be paid by the City. Chapter 4.11, Police Department Fee, mirrors Chapter 4.10 in that this Chapter requires the payment of a fee for a specific public service, in the case of Chapter 4.11, the fee goes toward police facilities.

The purpose of Chapter 7.8, Library Facilities Development Impact Fees, is to create and establish a library facilities development impact fee for the City, which shall be used to mitigate adverse impacts to public library facilities and equipment attributed to new development. The library fee shall be used by the City to pay a portion of the costs of designated library facilities and equipment impacted by new development. The library fee shall be based on a method designed to ensure that developers pay their fair share of the cost of such library facilities and equipment required to serve the City's growing population.

Section 9.22.060, Fire protection, is under Chapter 9.22, Performance Standards. Section 9.22.060 explains that all new or modified development shall be built per the currently adopted CFC, related CMC provisions, and current Clovis Fire Code standards and policies.

Title 10 is dedicated to Parks and Recreation. This title regulates street trees and plants (Chapter 10.1); use of City parks and other City public facilities (Chapter 10.2); prohibited acts (Chapter 10.3); violations (Chapter 10.4); and skate park facilities (Chapter 10.5).

City of Clovis Parks Master Plan

The City of Clovis Parks Master Plan (Parks Master Plan) provides strategic guidance in the provision of parks services to best develop, promote, utilize, manage, and maintain a functional park system for the City. The Parks Master Plan will guide policy development, prioritize demands and opportunities, and generate a strategic action plan for the next five to 10 years. The Parks Master Plan addresses current and aging areas of the City park system, as well as future growth of the City and identifies

[18] It should be noted that fee laws do not allow any deficits in fees to be made up retroactively.

opportunities that will expand and complement the City Parks Division and address the needs of the community.[19]

3.14.3 - Methodology

This analysis identifies potential impacts to fire protection, police protection, schools, libraries, parks, and other public facilities based on development anticipated from the proposed project. Impacts to public services and parks were assessed using the significance criteria established by the California Environmental Quality Act (CEQA) Guidelines, as well as State and local plans, regulations, and ordinances.

Cumulative Analysis

The geographic scope of the cumulative public services analysis is the service area of each of the providers serving the proposed project. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to public services. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.14.4 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to public services resulting from the implementation of the proposed project would be considered significant if the project would:

> . . . 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:
>
> a) Fire protection.
> b) Police protection.
> c) Schools.
> d) Parks.
> e) Other public facilities.

[19] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

3.14.5 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Fire Protection

Impact PUB-1: **The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that have not requested and would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no impacts would occur.

Master Plan and MP Area 2

The proposed Master Plan would introduce new commercial and residential uses to the City, creating an increase demand for fire services, compared to existing conditions. As of 2024, CFD did not meet or exceed its 90th percentile response time goals.[20,21,22] While the CFD has not met response time goals as of 2024, CFD's Station 6, opened in 2022, will allow the CFD to respond more quickly and serve more people within its jurisdiction. Additionally, the City has started the identification and planning for the construction of Fire Station 7 in the northwest region of the City, commonly referred to as Heritage Grove. This station would become the first-due station for the proposed project and is planned to be in service by 2030.[23] Until Fire Station 7 is in service, the proposed project would be primarily served by Fire Station 5. Fire Station 5 is located approximately 1.55 mile south of the Master Plan Area at the southwest corner of Temperance and Alluvial Avenues.

To the extent that future development associated with the Master Plan would have an incremental increase in demand on fire services provided by the CFD, future development within Master Plan

[20] Krahn, Katie. Senior Management Analyst, Clovis Fire Department (CFD). Personal Communication: e-mail. April 17, 2025.

[21] CFD's response time goal is 6 minutes and 30 seconds, 90 percent of the time. As of 2023, the average response time for emergency calls was 7 minutes and 48 seconds.

[22] Clovis Fire Department (CFD). 2024. Annual Report.

[23] Ibid.

(MP) Area 2 would be required to pay the community facility fee in accordance with CMC Chapter 4.10, Fire Facility Development Impact Fee. The fee is imposed on residential development within the City to ensure that service levels are met with respect to the additional demands placed on fire and emergency services resulting from implementation of development projects.

According to the most recent CDF estimates, the population of the City is 127,674, and the average number of persons residing in a dwelling unit is 2.81; therefore, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. MP Area 2 of the Master Plan is estimated to account for 1,596 of the 9,234 person increase in residents of the Master Plan Area. As of 2025, the CFD has 68 personnel. The addition of 9,234 residents, which equates to a staffing level of approximately 0.5 firefighters/emergency responders per 1,000 residents, would not represent a significant change from the current service ratio of 0.53 firefighters/emergency responders per 1,000 residents. MP Area 2's increase of 1,559 residents equates to a staffing level of approximately 0.52 firefighters/emergency responders per 1,000 residents. MP Area 2 of the proposed Master Plan would itself also not represent a significant change from the current service ratio of 0.53 firefighters/emergency responders per 1,000 residents. The City has anticipated additional firefighters and emergency responders would be hired as the City's population grows.

Because the proposed Master Plan would be served by existing and planned facilities, would not significantly alter the ratio of firefighters to residents, and would pay applicable development fees, implementation of the proposed Master Plan would not create a need for new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Development fees from future development within MP Area 2 would be collected based on projected impacts from each development. The adequacy of impact fees is reviewed periodically to ensure that the fee is commensurate with the service. In addition, MP Area 2 would be required to be annexed into the City's Public Safety Community Facilities District. Payment of the applicable impact fees by future development within MP Area 2, and ongoing revenues that would be generated by property taxes, sales taxes, and other revenues generated by the implementation of the proposed MP Area 2, would fund capital and labor costs associated with fire protection and emergency services. Furthermore, as the City receives development applications for subsequent development within MP Area 2, those applications would be reviewed by the City for compliance with the applicable policies of the General Plan to ensure that fire protection services keep pace with new development. In addition, the CMC, which implements the City's General Plan, would be reviewed when development applications are received. Therefore, implementation of the proposed Master Plan would not require the construction of additional fire department facilities, and the impact of the proposed Master Plan and, thus, MP Area 2 on the need for additional fire services facilities would be less than significant.

Vista Ranch Development/MP Area 1

Construction

As part of project construction, the proposed project would be required to comply with applicable provisions of the California Building Standards Code (CBC) and the CFC. In compliance with the CFC, Part 9 of the CBC, during construction, the proposed project would be required to follow fire safety standards related to provisions of fire apparatus access and acquisition of building permits.

Specifically, CBC Section 501.3 requires plans be submitted to the fire department for review and approval for proposed fire apparatus access, location of fire lanes, security gates, and fire hydrant systems for which fire department access is required by the Fire Code; this would ensure adequate driveway/entry turning radius, height clearance, and fire hydrant access for fire trucks and engines at the project site during construction. In addition, this would ensure that construction would not obstruct the CFD from delivering adequate levels of fire protection services and otherwise help to ensure that all applicable standards and requirements are satisfied. Given the foregoing, project construction would not create the need for new or altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives for fire protection.

Construction activities have the potential to affect emergency services by potentially requiring partial lane closures during street improvements and utility installation. The proposed project construction would not include any road closures or roadwork that would impair or interfere with an adopted emergency response plan. Adherence to applicable regulations in place to regulate traffic control would ensure the proposed project would not impair or interfere with emergency response times or otherwise impact performance objectives related to the provision of fire protection services, and the impact would be less than significant. Therefore, construction impacts related to fire protection would be less than significant.

Operation

The proposed Vista Ranch Development would introduce new residential uses to the City, creating an increase in demand for fire services, as compared to existing conditions. As of 2023, the CFD did not meet or exceed its 90th percentile response time goals.[24,25]

As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. The proposed Vista Ranch Development would account for approximately 7,638 new residents within the Master Plan Area[26] and, therefore, could affect the CFD's ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population. The project applicant would be subject to the community facility fee in accordance with CMC Chapter 4.10, Fire Facility Development Impact Fee, as described above. Payment of these fees would contribute funding for increased staffing and resources, and, therefore, impacts would be less than significant. The CFD did not identify a need for new or expanded facilities as a result of the proposed project. Additionally, the City has started the identification and planning for the construction of Fire Station 7 in the northwest region of the City, commonly referred to as Heritage Grove. Impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

[24] Krahn, Katie. Senior Management Analyst. Personal Communication: Email. April 17, 2025.

[25] CFD's response time goal is 6 minutes and 30 seconds, 90 percent of the time. As of 2023, the average response time for emergency calls was 6 minutes and 41 seconds.

[26] Approximately 6 percent of the City's current population (approximately 127,674 persons).

MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

A significant cumulative environmental impact would result if cumulative growth exceeded the ability of the CFD to adequately serve their service areas, thereby requiring construction of new facilities or modification of existing facilities. Development projects within the CFD service area would be required to comply with the City's requirements that address fire protection and EMS, including the payment of impact fees designed to ensure adequate facilities. CFD does not currently meet their target response time, as discussed above. However, the City is currently in the process of planning and constructing a new fire station in the northwestern portion of the City, which is expected to be operational by 2030, and all cumulative projects are required to pay applicable development impact fees. Therefore, cumulative impacts would be less than significant.

The proposed Master Plan's incremental contribution to the less than significant cumulative impacts would not be cumulatively considerable. As discussed under Impact PUB-1, implementation of the Master Plan would not create a need for new or physically altered facilities. Development of the proposed Master Plan would contribute toward an increased demand for fire protection services and facilities within the City. It has been determined that impacts to the CFD would be less than significant, as discussed above. Future development associated with the Master Plan would be subject to all fees that are paid toward the enhancement of public services within the City. Payment of the applicable impact fees by future project applicants and ongoing revenues from property taxes, sales taxes, and other revenues generated by the proposed Master Plan would assist in maintaining existing fire services. Therefore, the proposed Master Plan's incremental contribution to fire protection and EMS would not be cumulatively considerable. The proposed Master Plan and, thus, MP Area 2, in conjunction with other future projects, would not have a cumulatively significant impact related to fire protection and EMS.

Vista Ranch Development/MP Area 1

A significant cumulative environmental impact would result if cumulative growth exceeded the ability of CFD to adequately serve their service areas, thereby requiring construction of new facilities or modification of existing facilities. Development projects within the CFD service area would be required to comply with the City's requirements that address fire protection and EMS, including the payment of impact fees designed to ensure adequate facilities. CFD does not currently meet their target response time, as discussed above. However, the City is currently in the process of planning for a new fire

station in the northwestern portion of the City, which is expected to be operational by 2030, and all cumulative projects are required to pay applicable development impact fees. Therefore, cumulative impacts would be less than significant.

The proposed Vista Ranch Development's incremental contribution to the less than significant cumulative impacts would not be cumulatively considerable. As discussed under Impact PUB-1, the Vista Ranch Development would not create a need for new or physically altered facilities. The Vista Ranch Development would contribute to an increased demand for fire protection services and facilities within the City. It has been determined that the impacts to the CFD would be less than significant, as discussed above. The project applicant would be subject to all fees that are paid toward the enhancement of public services within the City. Payment of the applicable impact fees and ongoing revenues from property taxes, sales taxes, and other revenues generated by the proposed Vista Ranch Development would assist in maintaining existing fire services. Therefore, the proposed Vista Ranch Development's incremental contribution to fire protection and EMS would not be cumulatively considerable. The proposed Vista Ranch Development, in conjunction with other future projects, would not have a cumulatively significant impact related to fire protection and EMS.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Police Protection

Impact PUB-2:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, no impacts would occur.

Master Plan and MP Area 2

The proposed Master Plan would introduce new commercial and residential uses to the City and would include up to 3,286 residential units, an increase of approximately 9,234 persons. MP Area 2 would account for up to 568 residential units within the Master Plan Area, an increase in population of

approximately 1,596 persons. This would create an increased demand for police protection services compared to existing conditions.

To the extent that future development associated with the Master Plan would have an incremental increase in demand on police protection services provided by the CPD, future projects would be required to pay the police facility fee in accordance with CMC Chapter 4.11, Police Department Fees. The fee is imposed on residential development within the City for the purposes of assuring that the current level of service goals of the City are met with respect to additional demands placed on police facilities from such development. The City and CPD routinely monitor response times and reports annually on the results to ensure adequate police protection service levels are provided.

The Master Plan does not propose and would not create a need for new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. Therefore, the Master Plan would not result in adverse physical impacts associated with such police service facilities. Future development associated with the Master Plan would be required to pay the City's development fee specific to police, which in accordance with the CMC, shall be used solely to construct, equip, and furnish police stations. Payment of the fee would offset the incremental increase in demand for police protection services associated with the Master Plan. In addition, MP Area 2 would be required to be annexed into the City of Clovis Public Safety Community Facilities District to ensure funding would be provided to operate facilities and provide public services.

Based on the ability of the CPD to serve the City, it is anticipated that the existing police department facilities are sufficient to serve the proposed Master Plan and, thus, MP Area 2, and the construction of new or expanded police facilities would not be required. Therefore, impacts would be less than significant.

Vista Ranch Development/MP Area 1

As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. The proposed Vista Ranch Development would account for approximately 7,638 new residents within the Master Plan Area.[27] This would create an increased demand for police protection services compared to existing conditions. To the extent that the Vista Ranch Development would have an incremental increase in demand on police protection services provided by the CPD, the Vista Ranch Development would be required to pay the police facility fee in accordance with CMC Chapter 4.11, Police Department Fees. The City and CPD routinely monitor response times and report annually on the results to ensure adequate police protection service levels are provided.

The Vista Ranch Development does not propose and would not create a need for new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. The Vista Ranch Development would be required to pay the City's development fee specific to police, which in accordance with the CMC, shall be used solely to construct, equip, and furnish police stations. Payment of the fee would offset the incremental increase

[27] Approximately 6 percent of the City's current population (approximately 127,674 persons).

in demand for police protection services associated with the Vista Ranch Development. In addition, MP Area 1 would be required to annex into the City of Clovis Public Safety Community Facilities District to ensure funding would be provided to operate facilities and provide public services. Therefore, the Vista Ranch Development would not result in adverse physical impacts associated with such police service facilities.

Based on the ability of the CPD to serve the City, it is anticipated that the existing police department facilities are sufficient to serve the proposed Vista Ranch Development, and the construction of new or expanded police facilities would not be required. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

Cumulative projects, in conjunction with development proposed within MP Area 2, would create an increased demand for police services within the CPD service area. Additionally, CPD has indicated that the proposed project, in conjunction with other cumulative projects, could result in the need for a substation in the northern portion of the City.[28] Therefore, cumulative impacts would be potentially significant.

The proposed project does not entitle any specific development within MP Area 2, and future projects within that area would be required to undergo evaluation of potential environmental impacts pursuant to CEQA on a project-by-project basis. Additionally, future development within MP Area 2 would be required to pay all applicable development impact fees, which would support the development of new and maintenance of existing police facilities, reducing potential impacts to less than significant levels. Therefore, the proposed Master Plan would not result in a cumulatively considerable contribution to the potentially significant cumulative impact. Therefore, the proposed Master Plan and, thus, MP Area 2, in conjunction with other planned, proposed, or reasonably foreseeable projects, would result in a less than significant cumulative impact.

[28] Guerra, Iri. Police Captain, Division Commander, Clovis Police Department (CPD). Personal Communication: Email. April 15, 2025.

Vista Ranch Development/MP Area 1

A significant cumulative impact would occur if cumulative growth exceeded the ability of the CPD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities. Cumulative projects, in conjunction with the Vista Ranch Development, would create an increased demand for police services within the CPD service area. Additionally, CPD has indicated that the proposed project, in conjunction with other cumulative projects, could result in the need for a substation in the northern portion of the City.[29] Therefore, cumulative impacts would be potentially significant.

Although the proposed Vista Ranch Development, in conjunction with cumulative projects, would result in the need for a new police substation to be constructed, the proposed Vista Ranch Development would be required to pay the City's development impact fee specific to police as outlined in the CMC, which would provide for the required expansion of police facilities. Therefore, the Vista Ranch Development would not result in a cumulatively considerable impact, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Less than cumulatively considerable contribution.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution.

Mitigation Measures

None.

Schools

Impact PUB-3:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only, would not result in physical development, and does not envision or entitle any development in the Non-development Area. Therefore, no impacts would occur.

[29] Guerra, Iri. Police Captain, Division Commander, Clovis Police Department (CPD). Personal Communication: Email. April 15, 2025.

Master Plan and MP Area 2

MP Area 2 is located within the service boundaries of the CUSD. Currently, properties located within MP Area 2 are assigned to Riverview Elementary School (approximately 2.47 miles west of the SOI Expansion Area), Granite Ridge Intermediate School (approximately 2.27 miles northwest of the SOI Expansion Area), and Clovis North High School (approximately 2.37 miles northwest of the SOI Expansion Area).

The proposed Master Plan proposes housing that would result in direct population growth. As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. MP Area 2 would account for up to 568 residential units, an increase of approximately 1,596 residents. The Master Plan, including MP Area 2 and the Vista Ranch Development, would generate up to 9,234 new residents, including school-aged children that would attend the schools that serve the SOI Expansion Area and surrounding area. Utilizing the student generation rates provided by the CUSD, and the most conservative student generation rate based on single-family units, the proposed Master Plan would be expected to generate approximately 1,830 new students, broken down by grades as follows:

- Grades TK–6: 1,119
- Grades 7–8: 259
- Grades 9–12: 453

MP Area 2 alone would be expected to generate approximately 316 new students, broken down by grades as follows:

- Grades TK–6: 193
- Grades 7–8: 45
- Grades 9–12: 78

Students generated as a result of Master Plan implementation would most likely attend Riverview Elementary School, Granite Ridge Intermediate School, and Clovis North High School, as these are the schools currently assigned to the properties at the SOI Expansion Area; however, student placement is subject to CUSD's determination.

CUSD's facility capacity was estimated at 22,791 for grades TK–6, 6,561 for grades 7–8, and 12,135 for grades 9–12 as of 2025.[30] The CUSD does not have existing capacity to accommodate projected students from new development.[31] Therefore, the CUSD would need at a minimum the construction of a new elementary school and would require CUSD to hire approximately 75 new teachers and staff.[32] CUSD currently owns four elementary school sites (Fowler-McKinley, Minnewawa-Perrin, Minnewawa-International, and an elementary site in the Millerton Specific Plan Area), as well as the Bradley Educational Center site, which would accommodate a future high school, intermediate

[30] Stairs, Denver. Assistant Superintendent, Facility Services. Personal Communication: Email. April 2, 2025.

[31] Ibid.

[32] Ibid.

school, and elementary school. The proposed Master Plan plans for the future development of a new approximately 19-acre CUSD elementary school within MP Area 2 to serve the new community, and a site for the school has been planned but not yet confirmed. Therefore, CUSD has school site capacity for all projected students in all grade levels, and no new site acquisition would be needed.

School districts are authorized to collect fees on new residential and commercial/industrial development in accordance with Education Code Section 17620 and Government Code Section 65995. Payment of the applicable impact fees by the project applicant of future discretionary projects associated with the Master Plan, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the proposed Master Plan, would fund improvements associated with school services. Furthermore, according to Government Code Section 65996, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for any demands or impacts on school facilities caused by new development. Therefore, the impact of the proposed Master Plan and, thus, MP Area 2 on the need for additional school facilities would be less than significant.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development is located within the service boundaries of the CUSD. Currently, properties located within MP Area 1 are assigned to Riverview Elementary School (approximately 2.47 miles west of the SOI Expansion Area), Granite Ridge Intermediate School (approximately 2.27 miles northwest of the SOI Expansion Area), and Clovis North High School (approximately 2.37 miles northwest of the SOI Expansion Area). However, student placement is subject to CUSD's determination.

The Master Plan proposes housing that would result in direct population growth. As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. The Vista Ranch Development would account for up to 2,718 residential units, an increase of approximately 7,638 residents. The Master Plan, including both the Vista Ranch Development and MP Area 2, would generate up to 9,234 new residents, including school-aged children that would attend the schools that serve the SOI Expansion Area and surrounding area. Utilizing the student generation rates provided by the CUSD, and the most conservative student generation rate based on single-family units, the proposed Master Plan would be expected to generate approximately 1,830 new students, broken down by grades as follows:

- Grades TK–6: 1,119
- Grades 7–8: 259
- Grades 9–12: 453

Based on a maximum of 2,718 proposed new residential units, the proposed Vista Ranch Development would account for a population growth of up to 7,638 new residents of the total Master Plan, including school-aged children that would attend the schools that serve the SOI Expansion Area and surrounding area. Utilizing the student generation rates provided by the CUSD in the School Facilities Needs Analysis, and the most conservative student generation rate based on single-family

units, the proposed Vista Ranch Development would be expected to generate approximately 1,514 new students, broken down by grades as follows:

- Grades TK–6: 925
- Grades 7–8: 214
- Grades 9–12: 375

CUSD's facility capacity was estimated in 2025 at 22,791 for grades TK–6, 6,561 for grades 7–8, and 12,135 for grades 9–12.[33] According to consultation with CUSD, CUSD currently does not have sufficient capacity at the elementary and high school levels to accommodate projected students from new development. Therefore, the CUSD would need at a minimum the construction of a new elementary school and would require CUSD to hire approximately 75 new teachers and staff.[34] CUSD currently owns four elementary school sites (Fowler-McKinley, Minnewawa-Perrin, Minnewawa-International, and an elementary site in the Millerton Specific Plan Area), as well as the Bradley Educational Center site, which would accommodate a future high school, intermediate school, and elementary school. The proposed Master Plan includes development of a new approximately 19-acre CUSD elementary school within MP Area 2 to serve the new community, and a site for the school has been planned but not yet confirmed. Therefore, CUSD has school site capacity for all projected students in all grade levels, and no new site acquisition would be needed.

The proposed project would be required to pay all applicable development impact fees, which would fund improvements associated with school services. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation" for any demands or impacts on school facilities caused by new development.

Therefore, the impact of the proposed Vista Ranch Development on the need for additional school facilities would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: Less than significant impact.

Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

[33] Stairs, Denver. Assistant Superintendent, Facility Services. Personal Communication: Email. April 2, 2025

[34] Ibid.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

The geographic scope of the cumulative school facilities analysis includes the service area of CUSD. Planned projects including those listed in Table 3-1 would result in residential development, though none include any educational facilities. As previously discussed, impacts to school services would result in a less than significant impact.

Development of the proposed Master Plan would contribute toward an increased demand for school services and facilities within the City. Future development within MP Area 2 would be subject to all fees that are paid toward the enhancement of public services within the City. Payment of the applicable impact fees by the project applicants, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the proposed Master Plan, would assist in maintaining existing school services. Development of the proposed Master Plan would have a less than significant cumulative impact relative to this environmental topic. As such, impacts related to school services would result in a less than cumulatively considerable contribution.

All approved developments, including MP Area 2 of the proposed Master Plan and the Vista Ranch Development discussed below, and the projects discussed in Table 3-1 and development within school service areas, would be required to pay applicable development impact fees toward school district facilities. Pursuant to Government Code Section 65996, payment of adopted development fees is considered “full and complete mitigation” for impacts to school facilities, and local governments are prohibited from assessing additional fees or exactions for school impacts. As part of the project entitlement processes, cumulative project applicants would be responsible for paying their fair share of school facility fees. With payment of school impact development fees, cumulative projects would not result in additional need for new or altered school facilities not already analyzed within the applicable General Plan, and impacts would be less than significant. Since, future development associated with the proposed Master Plan would be required to pay applicable school impact fees, the proposed Master Plan and, thus, MP Area 2 would not contribute significantly to cumulative impacts associated with schools.

Vista Ranch Development/MP Area 1

The geographic scope of the cumulative school facilities analysis includes the service area of CUSD. Planned projects including those listed in Table 3-1 would result in residential development, though none include any educational facilities. As previously discussed, impacts to school services would result in a less than significant impact

Potential new students coming from the proposed project would be serviced by CUSD. Students generated as a result of Vista Ranch Development implementation, would most likely attend Riverview Elementary School, Granite Ridge Intermediate School, and Clovis North High School, as

these are the schools currently assigned to the properties at the proposed SOI Expansion Area; however, student placement is subject to CUSD's determination. Because of grade configurations, program changes, and enrollment shifts, students associated with the proposed project and other planned projects may be diverted to other schools; however, the CUSD does not have the capacity to accommodate these students within the existing facilities. However, payment of the applicable impact fees by the project applicant, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by the proposed Vista Ranch Development, would fund improvements associated with school services. As such, impacts would be less than significant. The proposed project would be required to pay applicable school impact fees and, therefore, would not contribute significantly to cumulative impacts associated with schools.

All approved developments, including the proposed Vista Ranch Development, the projects discussed in Table 3-1, and development within school service areas, would be required to pay applicable development impact fees toward school district facilities. Pursuant to Government Code Section 65996, payment of adopted development fees is considered "full and complete mitigation" for impacts to school facilities, and local governments are prohibited from assessing additional fees or exactions for school impacts. As part of the project entitlement processes, cumulative project applicants would be responsible for paying their fair share of school facility fees. With payment of school impact development fees, cumulative projects would not result in additional need for new or altered school facilities not already analyzed within the applicable General Plan, and impacts would be less than significant. Since the proposed Vista Ranch Development would be required to pay applicable school impact fees, the proposed Vista Ranch Development would not contribute significantly to cumulative impacts associated with schools.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Parks

Impact PUB-4: **The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, no impacts would occur.

Master Plan and MP Area 2

The proposed Master Plan proposes housing that would result in direct population growth. As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. MP Area 2 would account for up to 568 residential units, an increase of approximately 1,596 residents. The City's General Plan identifies a park standard based on a goal of 4 acres of public parkland per 1,000 residents within the City limits. The Master Plan proposes to include approximately 59 acres of parks, trails, and preserved open space.

The City currently does not meet the park acreage standards for any park category, except for regional parks. Regional parks are not located within the City or its SOI but serve the City's population. The City's Parks Master Plan identifies additional facility needs required through 2028. The goal for future planning increases the park area to approximately 380 acres and also substantially increases the number of trails. This amount is approximate and could be met by a combination of utilizing existing undeveloped parkland and acquiring new parkland to develop.

According to the most recent CDF estimates, the population of the City is 127,674 persons, and the average number of persons per household is 2.81; therefore, the proposed Master Plan is estimated to increase the population by approximately 9,234 residents. MP Area 2 would account for up to 568 residential units, an increase of approximately 1,596 residents.[35] The City has a ratio of approximately 1.43 acres of parkland per 1,000 residents. Incorporating the estimated 135 acres (50 percent) of the school recreation facilities, the City has a ratio of approximately 2.48 acres per 1,000 residents.[36] The addition of 9,234 residents and the additional 27 acres of public parkland from the proposed Master Plan would equate to a parkland ratio of approximately 1.52 acres per 1,000 residents or 2.51 acres per 1,000 residents with the inclusion of the estimated 135 acres of school recreational facilities.

[35] California Department of Finance (CDF). 2024. E-4 Population Estimates for Cities, Counties, and the State, 2021-2024 with 2020 Census Benchmark. Website: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2024-with-2020-census-benchmark/. Accessed May 6, 2025.

[36] Perez, McKencie. Deputy City Planner, City of Clovis. Personal communication: e-mail. July 25, 2025.

Although the Master Plan's proposed new open space opportunities would bring the City closer to its goal of parkland for its future residents, it would not provide enough parkland needed to meet the 4 acres per 1,000 people standard. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the Clovis General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. In accordance with the CMC, fees are deposited in specific funds that shall be used solely for the acquisition, improvement, and expansion of public parks and recreation facilities as outlined in the park acquisition and improvement fee update. The proposed Master Plan would provide approximately 59 acres of parks, trails, and preserved open space, and future development within MP Area 2 would pay any applicable development fees. Future development associated with the proposed Master Plan and, thus, MP Area 2 would therefore result in less than significant impacts related to the need for parks and recreational facilities.

Vista Ranch Development/MP Area 1

As previously discussed, the entire Master Plan Area is estimated to increase the population by approximately 9,234 residents. The proposed Vista Ranch Development would account for approximately 7,638 new residents within the Master Plan Area. The Vista Ranch Development proposes to include open space, such as parks, trails, and preserved open space, and would pay park impact fees according to CMC Chapters 3.04 and 3.10. It is not anticipated that the proposed Vista Ranch Development would result in a significant increase in the use of existing neighborhood and regional parks or other recreational facilities, such that substantial deterioration would occur, because the Vista Ranch Development includes new recreational facilities for residents within MP Area 1 and provides funding to existing park facilities through required fees. Therefore, the proposed Vista Ranch Development would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for parks. As such, the proposed Vista Ranch Development would have a less than significant impact.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

The Master Plan would be expected to result in increased population resulting in increased demand for park and recreational facilities. The City currently does not meet the park acreage standards for any park category, except regional parks as described above. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. Other projects listed in Table 3-1 that are within City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would similarly be required to provide parkland or pay applicable development fees, and otherwise mitigate any such impacts. Therefore, MP Area 2's contribution to parkland impacts would not be cumulatively considerable. Cumulative projects in the City would also be required to pay park mitigation fees and comply with any applicable Quimby and non-Quimby requirements. Therefore, the cumulative projects would not result in the off-site construction of new or expanded existing park facilities and would not result in a significant cumulative impact on the environment. Given the above information, implementation of MP Area 2, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to the need for new or altered recreational facilities.

Vista Ranch Development/MP Area 1

The Vista Ranch Development would be expected to result in increased population resulting in increased demand for park and recreational facilities. The City currently does not meet the park acreage standards for any park category, except regional parks. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. Other projects listed in Table 3-1 that are within City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would similarly be required to provide parkland or pay applicable development fees, and otherwise mitigate any such impacts. The proposed Master Plan would also provide approximately 59 acres or parks, trails, and preserved open space. Therefore, the proposed Vista Ranch Development's contribution to parkland impacts would not be cumulatively considerable. Projects in the City in the project vicinity would also be required to pay park mitigation fees and comply with any applicable Quimby and non-Quimby requirements. Therefore, the cumulative projects would not result in the off-site construction of new or expanded existing park facilities and would not result in a significant cumulative impact on the environment. Given the above information, the Vista Ranch Development, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to the need for new or altered recreational facilities

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Other Public Facilities

Impact PUB-5:	**The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, no impacts would occur.

Master Plan and MP Area 2

The proposed Master Plan would bring residents to the area, which may require the use of other public services such as libraries, civic centers, etc. Public services such as the Clovis Branch of the Fresno County Public Library and the Clovis Senior Center would continue to serve future Master Plan residents. The City collects impact fees from new development based upon projected impacts from each development, including impacts on other public services as required by Chapter 3.10, Development Impact Fees, and Chapter 7.8, Library Facilities Development Impact Fees, of the CMC. While the proposed Master Plan does not approve or entitle any specific development in MP Area 2, future development would be required to pay applicable impact fees, which would fund capital and labor costs associated with these other public services. The Fresno County Public Library would meet changing demands incrementally, and MP Area 2 would not directly trigger the need for new facilities associated with other public services. Consequently, new facilities for other public services are not proposed at this time. The proposed Master Plan and, thus, MP Area 2 would not result in the need for new facilities for other public services, and impacts would be less than significant.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would bring residents to the area which may require the use of other public services such as libraries, civic centers, etc. Public services such as the Clovis Branch of the Fresno County Public Library and the Clovis Senior Center would continue to serve future Master Plan residents. The City collects impact fees from new development based upon projected impacts from each development, including impacts on other public services as required by Chapter 3.10, Development Impact Fees, and Chapter 7.8, Library Facilities Development Impact Fees, of the CMC. Payment of the applicable impact fees by the project applicant, and ongoing revenues that

would come from property taxes, sales taxes, and other revenues generated by the proposed Vista Ranch Development, would fund capital and labor costs associated with these other public services. The proposed Vista Ranch Development would not trigger the need for new facilities associated with other public services. Consequently, new facilities for other public services are not proposed at this time. The proposed Vista Ranch Development would not result in the need for new facilities for other public services, and impacts would be less than significant relative to this topic.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

Master Plan and MP Area 2

The geographic scope of the cumulative library and other public facilities analysis is the Fresno County Library service area. An increase in population from the proposed project and cumulative development projects would result in an increased demand for library facilities. Development of the proposed Master Plan would contribute toward an increased demand for public services and facilities within the City. However, future development within MP Area 2 would be subject to all fees that are paid toward the enhancement of public services within the City. As such, it has been determined that the impacts to public services and facilities would be less than significant.

All approved developments, including the proposed Vista Ranch Development and the projects discussed in Chapter 3, Environmental Impact Analysis, Table 3-1 would be required to pay applicable development impact fees toward library facilities. With payment of impact development fees, cumulative impacts to library services would be less than significant. Payment of the applicable impact fees by future development projects, and ongoing revenues that would come from property taxes, sales taxes, and other revenues generated by development within MP Area 2, would assist in maintaining existing library services. Development of the proposed Master Plan would have a less than significant cumulative impact relative to this environmental topic. As such, impacts related to public services would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

The geographic scope of the cumulative library and other public facilities analysis is the Fresno County Library System. An increase in population from the proposed project and cumulative development projects would result in an increased demand for library facilities. To help offset this

increase, cumulative developments would be required to pay development impact fees. Accordingly, there would be a less than significant cumulative impact regarding the additional need for new or altered library facilities. The proposed Vista Ranch Development would pay all applicable development impact fees as described above. Therefore, the proposed project would not contribute significantly to cumulative impacts associated with public facilities.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.15 - Recreation

3.15.1 - Introduction

This section describes existing parks and recreational facilities in the region and project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to parks and recreational facilities that could result from the implementation of the proposed project. Information in this section is based, in part, on information obtained from the Clovis General Plan and Parks Master Plan.

No public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to recreation.

3.15.2 - Environmental Setting

City of Clovis Parks and Recreation Division

The General Services Department oversees City of Clovis Recreation, which provides a range of services for residents and visitors, such as youth and adult programs, senior services, transit, and other Clovis Recreation programs, including the City of Clovis Batting Cages, Clovis Rotary Skatepark, adult slow-pitch softball at Clovis Rotary Park, and the youth and adult programs at the Clovis Recreation Center.[1]

The Parks Division falls under the direction of the Public Utilities Department and is overseen by a full-time Parks Manager with a staff of approximately 20 employees. The goal of the Parks Division is to maintain recreational facilities, streetscape, parks, trails, and other landscaped open space areas, City trees, and building grounds.[2]

The Parks Division maintains approximately 610 acres of City parks and landscaping, consisting of 94 parks totaling 182 acres; 340 acres of green belts, street gardens, and landscaped median islands; 100 acres of trails; 6 acres of building grounds; 11 acres of undeveloped park land and miscellaneous public right-of-way property; and approximately 42,000 City street trees.[3] The parks range from passive (Dry Creek Trailhead and Cottonwood) to active (Rotary and Sierra Bicentennial) and are a mix of smaller pocket parks to larger basin parks. All parks are classified as either Pocket Park, Neighborhood Park, Area Park, Community Park, Regional Park, School Park, or Basin Park based on the park standards outlined by the City. Four of the City parks are jointly maintained by a

[1] City of Clovis. 2025. City of Clovis Recreation. Website: https://www.clovisca.gov/services/recreation.php. Accessed April 17, 2025.

[2] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

[3] Perez, McKencie. Deputy City Planner, City of Clovis. Personal communication: e-mail. July 25, 2025.

Homeowner's Association (HOA). In addition to these facilities, the City maintains over 28.1 miles of trails. These trails consist of four primary trails (Clovis Old Town Trail, Dry Creek Trail, Enterprise Trail, and Pacific Gas and Electric Company [PG&E] Trail), as well as a series of greenbelt paths in the northeast corner of the City and paseos in the southeast. The City also has a successful joint use agreement with Clovis Unified School District (CUSD) that allows the use of school recreational facilities by City residents outside of school hours. These facilities provide numerous athletic fields, gymnasiums, and swimming pools for public use.[4]

Existing Park and Recreational Facilities

City of Clovis

The following is a description of the various City park classifications.[5]

Pocket Parks

Pocket parks are the smallest park classification. At less than 1 acre in size, these parks are centrally located in residential neighborhoods and planned for families and children. Pocket parks are intended to offer a small open space recreational venue for more passive recreation internal to a specified residential development. Typically, these parks provide picnic and sitting areas and should be accessible by foot or bicycle.

Neighborhood Parks

Neighborhood parks are 1 to 2 acres in size and are uniquely tailored to the neighborhoods they serve, providing active recreation and a balance of amenities that appeal to a broad range of individuals.

Area Parks

Area parks function much like neighborhood parks but are typically larger, ranging from 3 to 20 acres, and serve a larger population. These are intended to provide amenities for multiple age groups and connect to neighborhoods via trails or sidewalks.

Community Parks

Community parks are considerably larger in scale, ranging from 15 to 100 acres, meeting a wide range of community recreation and social needs, focused on both passive and active recreation. The purpose of a community park is to bring people together to recreate, socialize, and find quiet space. Amenities may include those similar to a neighborhood park, as well as group picnic facilities, internal trails, and athletic facilities.

[4] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

[5] Ibid.

Regional Parks

Regional parks typically service multiple cities, cross political jurisdictions, and exceed 100 acres in size. The purpose of regional parks is to preserve natural resources, remnant landscapes, and open space. Regional parks can include passive activities, such as hiking and nature viewing, as well as active recreation areas, gardens, picnic facilities, and other special uses. There are currently no regional parks in the City; however, there are three regional parks beyond the city limits and the Sphere of Influence (SOI), including Woodward Park, Millerton Lake State Recreational Area, and Lost Lake Recreation Area.

Basin Park

This classification pertains to Fresno Metropolitan Flood Control District (FMFCD) basins used in concert with, or in-lieu of, other classes of parks to meet open space needs. These sites typically range from 5 to 20 acres, and their uses are generally limited to dry periods due to their main priority as flood control facilities. Basin parks offer connections to the larger community via trails or sidewalks.

School Park

School parks are used in concert with, or in lieu of, other classes of parks to meet open space needs. The City maintains an "open gate" policy for CUSD land and facilities available for recreational use after normal school hours and during the summer. These sites are best suited for community-based recreational programs and youth athletic facilities.

Current Park Ratios

The Clovis General Plan establishes a goal of 4 acres of public parkland per 1,000 residents. The City has a long-standing joint use agreement with CUSD for use of school district recreational facilities by the public. Because of limited access, these facilities are calculated at half their acreage and facility quantities in the Level of Service (LOS) analysis.[6] Thus, of the 271 acres of CUSD school playfields, approximately 135 acres are credited toward meeting the City's parkland standard.[7] The City has a ratio of approximately 1.43 acres of parkland per 1,000 residents.[8] Incorporating the estimated 135 acres (50 percent) of the school recreation facilities, the City has a ratio of approximately 2.48 acres per 1,000 residents.[9]

[6] Level of Service (LOS) standards and analysis is a commonly used method to examine how well a community's park and recreation needs are being met through a comparison to standards of national, State, and comparable municipality; population size is an important factor for assessing park and recreational needs.

[7] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

[8] Perez, McKencie. Deputy City Planner, City of Clovis. Personal communication: e-mail. July 25, 2025.

[9] Ibid.

SOI Expansion Area

There are no park facilities currently located on the SOI Expansion Area. The closest park is Deauville East Park located approximately 0.39 mile south of the SOI Expansion Area.

3.15.3 - Regulatory Framework

Federal

There are no applicable federal regulations, plans, or policies pertaining to recreation that are applicable to the proposed project.

State

Quimby Act

The Quimby Act (California Government Code § 66477) was established by the California Legislature in 1965 to preserve open space and parkland in rapidly urbanizing areas of the State. The Quimby Act allows cities and counties to establish requirements for new development to dedicate land for parks, pay an in lieu fee, or provide a combination of the two.

The Quimby Act provides two standards for the dedication of land for use as parkland. If the existing area of parkland in a community is greater than 3 acres per 1,000 residents, then the community may require dedication based on a standard of up to 5 acres per 1,000 persons residing in the subdivision based on the current ratio of parkland per 1,000 residents. If the existing amount of parkland in a community is less than 3 acres per 1,000 residents, then the community may require dedication based on a standard of only 3 acres per 1,000 persons residing in the subdivision.

The Quimby Act requires a city or county to adopt standards for recreational facilities in its general plan to adopt a parkland dedication or fee ordinance.

It should be noted that the Quimby Act applies only to the acquisition of new parkland; it does not apply to the physical development of new park facilities or associated operations and maintenance costs. Therefore, the Quimby Act effectively preserves open space needed to develop park and recreation facilities, but it does not ensure the development of the land or the provision of park and recreation services to residents. In addition, the Quimby Act applies only to residential subdivisions. Nonresidential projects could contribute to the demand for park and recreation facilities without providing land or funding for such facilities. Quimby Act fees are collected by the local agency (park district, city, or county) in which the new residential development is located.

Local

City of Clovis General Plan

The General Plan policies related to recreation that are applicable to the proposed project are identified below:[10]

Open Space and Conservation

Policy 1.1 **Parkland standard.** Provide a minimum of 4 acres of public parkland for every 1,000 residents.

Policy 1.3 **New parks and recreation facilities.** Provide a variety of parks and recreation facilities in underserved and growing areas of the community.

Policy 1.4 **Joint use of education facilities.** Provide a balanced system of parks and recreation facilities through joint use of facilities owned by school districts.

Policy 1.5 **Multipurpose open space.** Design public facilities as multipurpose open space and recreation to serve the community's infrastructure needs while preserving and enhancing open space and water features. Prioritize the use of existing basins for existing areas, and for future areas prioritize the development of separate park facilities available year-round.

Policy 1.7 **Sustainability.** Develop new and maintain existing parks and recreation facilities to achieve fiscal and environmental sustainability.

Policy 1.8 **Funding.** Require new development to provide pocket and neighborhood parks, dedicate land for area parks, and pay impact fees for community and regional parks. Require new development to establish lighting and landscape maintenance districts to fund operations and maintenance.

Policy 1.9 **Master plan.** Periodically update the Parks Master Plan to direct the implementation of the City's open space facilities.

City of Clovis Municipal Code

City of Clovis Municipal Code (CMC) Chapter 3.4, Park Acquisition and Development, establishes a method for coordinated acquisition and development of City park facilities. This Chapter states that any residential projects shall pay parks acquisition and development fees per dwelling unit.

Clovis Parks Master Plan

The City of Clovis Parks Master Plan (Parks Master Plan) provides strategic guidance in the provision of parks services to best develop, promote, utilize, manage, and maintain a functional park system for the City. The Parks Master Plan will guide policy development, prioritize demands and opportunities,

[10] City of Clovis. 2014. City of Clovis General Plan. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

and generate a strategic action plan through 2028. The Parks Master Plan addresses current and aging areas of the City park system, as well as future growth of the City, and identifies opportunities that will expand and complement the City Parks Division and address the needs of the community.[11]

The goal for future planning increases the park area to approximately 380 acres and also substantially increases the number of trails. This amount is approximate and could be met by a combination of utilizing existing undeveloped parkland and acquiring new parkland to develop.

3.15.4 - Methodology

This analysis identifies potential impacts to parks and recreational facilities based on development anticipated from the proposed project. Impacts to parks and recreational facilities were assessed using the significance criteria established by the California Environmental Quality Act (CEQA) Guidelines, as well as State and local plans, regulations, and ordinances.

Cumulative Analysis

The geographic scope of the cumulative recreational analysis is the City and its SOI. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to recreation. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.15.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to recreation are significant environmental effects. The project would have a potential impact if it would:

a) 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) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

[11] City of Clovis. 2018. Parks Master Plan. March. Website: https://www.clovisca.gov/documents/Services/Planning%20Development/Planning/Master%20Specific%20Plans/Clovis-Parks-Master-Plan-Final-3_19-18.pdf?t=202507181312570. Accessed October 15, 2025.

3.15.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the proposed project and provides mitigation measures where appropriate.

Increase Use of Parks

Impact REC-1:	**The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that have not requested and would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, the SOI Expansion and Non-development area would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur. Therefore, no impacts would occur.

MP Area 2

Implementation of MP Area 2 would result in an increase in the area's population, as a result of new residential and commercial development. As discussed previously, the Master Plan proposes up to 568 additional new residential units (excluding the Vista Ranch Development, discussed below), which would result in an increased residential population of approximately 1,596 persons.

The City's General Plan identifies a park standard based on a goal of 4 acres of public parkland per 1,000 residents within the City limits. MP Area 2 includes the designation of approximately 9 acres for parks, trails, and preserved open space. Although the City as a whole does not currently meet its park acreage standard, the proposed Master Plan would provide more than 4 acres of parkland per 1,000 people for the new population.

Therefore, the proposed development in MP Area 2 would not be required to dedicate additional parkland or pay in-lieu fees under CMC Chapter 3.4, Park Acquisition and Development. Required development impact fees would still contribute to expanding public parks citywide. As such, the proposed Master Plan would result in less than significant impacts related to the need for parks and recreational facilities.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would directly increase the number of persons by constructing up to 2,718 residential units, resulting in approximately 7,556 new residents. The Vista

Ranch Development proposes to include open space, such as parks, trails, and preserved open space totaling approximately 20 acres, and would pay park impact fees according to CMC Chapters 3.4 and 3.10. As discussed above, the City's General Plan identifies a park standard based on a goal of 4 acres of public parkland per 1,000 residents within the City limits. Although the City as a whole does not currently meet its park acreage standard, the proposed Master Plan would provide more than 4 acres of parkland per 1,000 people for the new population. Therefore, it is not anticipated that the proposed Vista Ranch Development would result in a significant increase in the use of existing neighborhood and regional parks or other recreational facilities, such that substantial deterioration would occur. Additionally, the Vista Ranch Development includes new recreational facilities for residents within MP Area 1 and the City and provides funding to existing park facilities through required fees. Thus, it is not anticipated that any substantial physical deterioration of existing facilities would occur or be accelerated. As such, the proposed Vista Ranch Development would have a less than significant impact relative to this topic.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The City currently does not meet the park acreage standards for any park category, except for regional parks. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the Clovis General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. Other projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 that are within the City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would similarly be required to provide parkland or pay applicable development fees, and otherwise mitigate any such impacts. Projects in the City in the project vicinity would also be required to pay park mitigation fees and comply with any applicable Quimby and non-Quimby requirements. Therefore, cumulative impacts would be less than significant.

Development within MP Area 2 would be expected to result in increased population resulting in increased demand for park and recreational facilities. However, the proposed project would provide

parks and recreation facilities, and future development within the Master Plan Area would be required to pay applicable development impact fees. Therefore, the development within MP Area 2's contribution to parkland impacts would not be cumulatively considerable. Given the above information, the proposed Master Plan, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to substantial physical deterioration of existing park facilities.

Vista Ranch Development/MP Area 1

As stated above, the City currently does not meet the park acreage standards for any individual park category, except regional parks. However, other projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 that are within City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would be required to provide parkland or pay applicable development fees and otherwise mitigate any such impacts in order to comply with any applicable Quimby and non-Quimby requirements. Therefore, cumulative impacts would be less than significant.

The Vista Ranch Development would be expected to result in increased population resulting in increased demand for park and recreational facilities. However, the proposed Vista Ranch Development would provide parks and recreation facilities, and the Vista Ranch Development would be required to pay applicable development impact fees. Therefore, the Vista Ranch Development's contribution to parkland impacts would not be cumulatively considerable. Given the above information, the Vista Ranch Development, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to substantial physical deterioration of existing park facilities.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Recreational Facilities Physical Effect on Environment

Impact REC-2:	**The proposed project would include recreational facilities but would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not include or require the construction or expansion of

recreational facilities which might have an adverse physical effect on the environment. As such, no impact would occur.

MP Area 2

Development of MP Area 2 would directly increase the number of persons by adding up to an additional 568 residential units, exclusive of the Vista Ranch Development discussed above, resulting in approximately 1,596 new residents. The Master Plan proposes to include open space, such as parks, trails, and preserved open space, and future development within the Master Plan Area would pay applicable development impact fees according to CMC Chapters 3.04 and 3.10. As such, it is not anticipated that the proposed Master Plan would require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment because the Master Plan includes new recreational facilities for residents within the Master Plan Area and provides funding to existing park facilities through required fees. Additionally, future park development would be required to complete individual environmental analysis pursuant to CEQA and mitigate any potential impacts. Therefore, it is not anticipated that any future recreational facilities would have an adverse effect on the environment. As such, the proposed development of MP Area 2 would have a less than significant impact.

Vista Ranch Development/MP Area 1

The proposed Vista Ranch Development would directly increase the number of persons by adding up to 2,718 residential units, resulting in approximately 7,556 new residents. The Vista Ranch Development proposes to include open space such as parks, trails, and preserved open space and would pay applicable development impact fees according to CMC Chapters 3.04 and 3.10. As such, it is not anticipated that the proposed Vista Ranch Development would require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment because the Vista Ranch Development includes new recreational facilities for residents within MP Area 1 and provides funding to existing park facilities through required fees. Additionally, environmental impacts resulting from the on-site construction of recreational facilities have been considered throughout this Revised Draft EIR. Therefore, it is not anticipated that recreational facilities, as a result of implementation of the Vista Ranch Development, would have an adverse effect on the environment. As such, the proposed Vista Ranch Development would have a less than significant impact.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

Cumulative projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 in conjunction with the proposed project would add residential units to the City. The proposed project, in conjunction with the listed projects, would not displace the housing units or people within the City. Cumulative project's listed in Table 3-1 that are within the project vicinity, as well as other relevant cumulative projects, would be required to complete individual environmental analysis pursuant to CEQA and mitigate any potential impacts as required and would be required to provide parkland or pay applicable development fees and otherwise mitigate any such impacts in order to comply with any applicable Quimby and non-Quimby requirements. Therefore, cumulative impacts associated with recreational facilities would be less than significant.

The Master Plan would be expected to result in an increased population, resulting in increased demand for park and recreational facilities. The City does not currently meet the park acreage standards for any park category except for regional parks, as described above. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the Clovis General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. Other projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 that are within City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would similarly be required to provide parkland or pay applicable development fees, and otherwise mitigate any such impacts. Therefore, the proposed project's contribution to parkland impacts would not be cumulatively considerable. Projects in the City in the project vicinity would also be required to pay park mitigation fees and comply with any applicable Quimby and non-Quimby requirements. Therefore, the cumulative projects would not result in the off-site construction of new or expanded existing park facilities and would not result in a significant cumulative impact on the environment. Given the above information, the proposed project, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to the need for new or altered recreational facilities.

Vista Ranch Development/MP Area 1

Cumulative projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 in conjunction with the proposed project would add residential units to the City. The proposed project, in conjunction with the listed projects, would not displace the housing units or people within the City. Cumulative project's listed in Table 3-1 that are in the project vicinity, as well as other relevant cumulative projects, would be required to complete individual environmental analysis pursuant to CEQA and mitigate any potential impacts as required and would be required to provide parkland or pay applicable development fees and otherwise mitigate any such impacts in order to comply with any applicable

Quimby and non-Quimby requirements. Therefore, cumulative impacts associated with recreational facilities would be less than significant.

The Vista Ranch Development would be expected to result in increased population, resulting in increased demand for park and recreational facilities. The City currently does not meet the park acreage standards for any park category except for regional parks, as described above. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the Clovis General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. Other projects listed in Chapter 3, Environmental Impact Analysis, Table 3-1 that are within City in the project vicinity, as well as other relevant cumulative projects as required by CEQA, would similarly be required to provide parkland or pay applicable development fees and otherwise mitigate any such impacts. Therefore, the proposed project's contribution to parkland impacts would not be cumulatively considerable. Projects in the City in the project vicinity would also be required to pay park mitigation fees and comply with any applicable Quimby and non-Quimby requirements. Therefore, the cumulative projects would not result in the off-site construction of new or expanded existing park facilities and would not result in a significant cumulative impact on the environment. Given the above information, the proposed project, in conjunction with other existing, planned, and probable future projects, would have a less than significant cumulative impact related to the need for new or altered recreational facilities.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.16 - Transportation

3.16.1 - Introduction

This section describes existing conditions related to transportation in the project area as well as the relevant regulatory framework. This section also evaluates the possible impacts related to transportation that could result from the implementation of the proposed project. Information in this section is based, in part, on the project-specific Transportation Impact Analysis (TIA) prepared by Kittelson & Associates (Kittelson) dated September 4, 2024, the Clovis Vista Ranch California Environmental Quality Act (CEQA) Transportation Evaluation (Transportation Evaluation) prepared by Kittelson dated June 27, 2024, and the Supplemental Traffic Analyses prepared by Peters Engineering Group (Peters Engineering) dated September 12, 2025, all of which are included in Appendix K.

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to transportation:

- Comment from the California Department of Transportation (Caltrans) requesting to be included in the Scope of Work for the Transportation section of the Revised Draft EIR (p. 3.16-16)
- Comment recommending the City consider creating a Vehicle Miles Traveled (VMT) mitigation impact fee to help reduce potential impacts and fund improvements at the intersection of Temperance Avenue and State Route (SR) 168 as well as the intersection of Owens Mountain Parkway and SR-168 (pp. 3.16-32 to 3.16-36)
- Comment stating that the City should continue to require mitigation that promotes a well-connected, non-motorized street network, implements a commute trip reduction program, and explores ways to reduce VMT within the Sphere of Influence (SOI) Expansion Area. (pp. 3.16-32 to 3.16-36)
- Comment recommending future projects contribute to all applicable impact fee programs. (p. 3.16-35)
- Comment requesting revisions and clarifications to the TIA. (Appendix K.3, Supplemental Traffic Analyses)
- Comment requesting a Synchro analysis on all signalized intersections. (pp. 3.16-25 to 3.16-26; 3.16-28 to 3.16-31)

- Comment stating that a lack of sufficient school funding may impact various environmental issues, including VMT and greenhouse gas (GHG) emissions.[1]
- Comment requesting that the Transportation section of the Revised Draft EIR address potential circulation and pedestrian safety impacts at the school site, especially since Shepherd Avenue is identified as an expressway. (pp. 3.16-38 to 3.16-44)
- Comment recommending the Revised Draft EIR incorporate strategies to reduce VMT and require cleanest available heavy-duty trucks, vehicles, and off-road equipment. (pp. 3.16-31 to 3.16-36)
- Comment stating the Revised Draft EIR should provide sufficient analysis to show transportation impacts to the City of Fresno. (pp. 3.16-25 to 3.16-26)
- Comment requesting transportation analysis related to how the proposed project would impact traffic operations and pedestrian/bicycle safety, including queueing, for the City of Fresno. (pp. 3.16-25 to 3.16-26; 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
- Comment requesting the Fresno County's (County's) Transportation Planning Unit to be included in the review process for any future transportation studies related to the proposed project. (pp. 3.16-45 to 3.16-46)
- Comment requesting review of any transportation studies associated with future developments within the Master Plan that would impact County roads. (pp. 3.16-45 to 3.16-46)
- Comment stating that as the City annexes fragmented sections of the Master Plan, the City should annex the full road right-of-way width fronting any future developments that are within or bordering the proposed Specific Plan to avoid any shared roads with the County. (p. 3.16-20)
- Comment requesting traffic studies evaluate for consistency of right-of-way and classifications of surrounding County roads and the circulation between neighboring cities or communities. (pp. 3.16-20; 3.16-25 to 3.16-26)
- Comment stating County roads and infrastructure cannot support this development as it is planned. (pp. 3.16-28 to 3.16-30; 3.16-43)
- Comment requesting the stated goal to confine ingress/egress to the 0.5-mile grid be reconsidered to reduce potential traffic safety impacts. (pp. 3.16-38 to 3.16-43)
- Comment expressing concerns related to traffic safety as a result of the proposed project, including at the intersection of Fowler Avenue and Behymer Avenue. (pp. 3.16-38 to 3.16-44)

[1] This comment addresses a topic outside the scope of CEQA and does not pertain to the evaluation of environmental impacts; therefore, no further response is required. The California Government Code significantly limits the application of CEQA with respect to school impact issues. The fees set forth in California Government Code Section 65996 constitute the exclusive means of both "considering" and "mitigating" a project's impacts on school facilities. Moreover, these fees are "deemed to provide full and complete school facilities mitigation" (Govt Code §65996(b)). Because the statute states that the statutory fees are the exclusive means of considering as well as mitigating impacts on school facilities, it limits not only the mitigation that may be required but also the scope of impact review in a project's EIR and the lead agency's findings on those impacts. See, e.g., Chawanakee Unified Sch. Dist. v County of Madera (2011) 196 CA4th 1016.

- Comment stating the developer should widen Shepherd Avenue to a double lane with foot path to accommodate traffic. (p. 3.16-7)
- Comment(s) stating concern related to traffic congestion and safety, including funding for street improvements. (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)
- Comment requesting that no traffic be allowed to be directed to Perrin Road. (pp. 3.16-25 to 3.16-26; 3.16-38 to 3.16-43)
- Comment stating Fowler Avenue needs to be developed first from Shepherd north to handle any new traffic. (pp. 3.16-38 to 3.16-43)
- Comment stating disapproval of setting up the SOI Expansion Area next to Shepherd Avenue due to traffic concerns. (pp. 3.16-28 to 3.16-30; 3.16-38 to 3.16-43)

3.16.2 - Environmental Setting

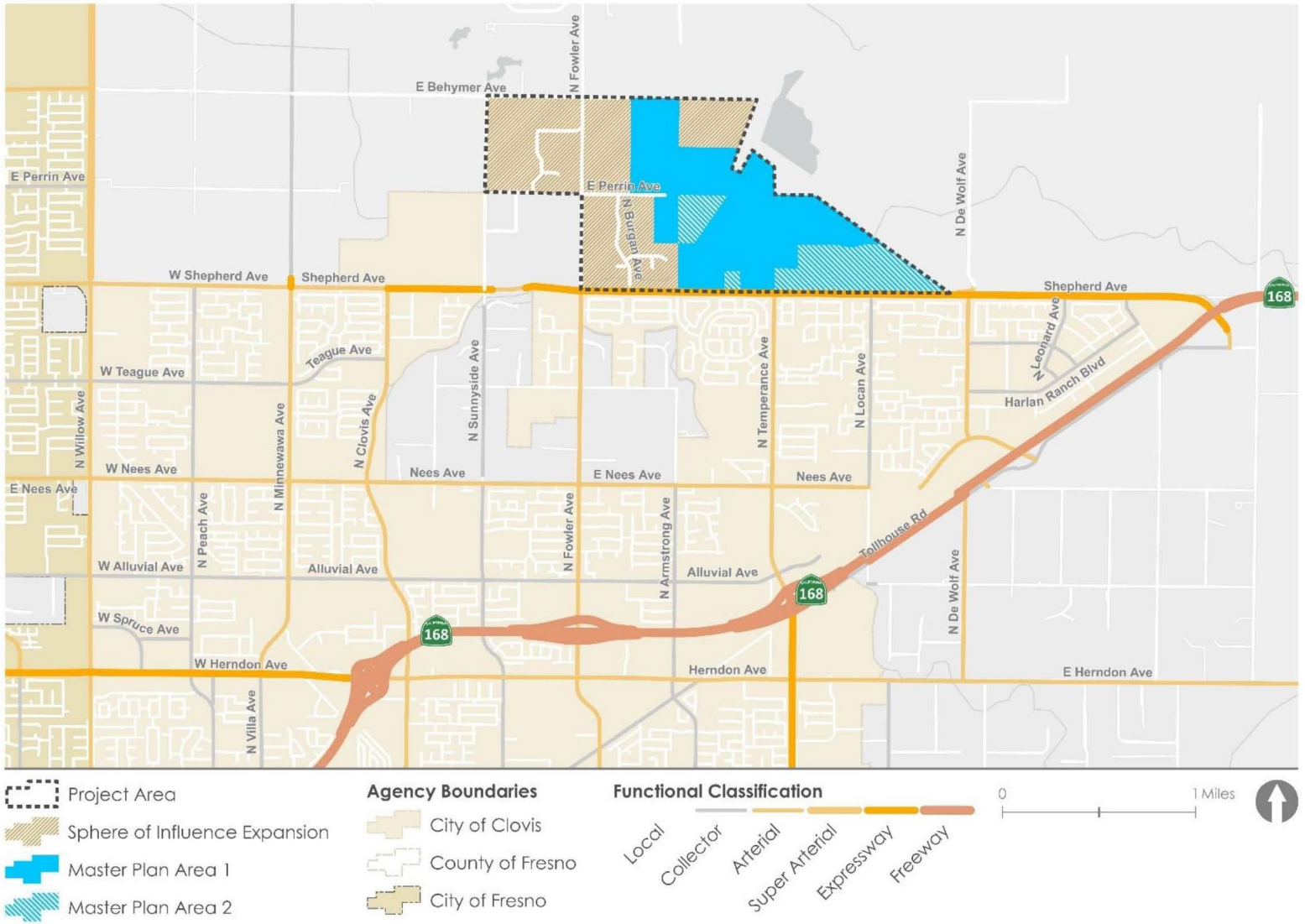
Roadway Facilities

Regional roadway facilities providing access to the proposed project are via State Route (SR) 168. Local access to the SOI Expansion Area is provided by various arterials and collectors. Exhibit 3.16-1 shows the proposed major street circulation network in the study area.

Freeways

SR-168 is a divided four-lane freeway running northeast to southwest through the study area. It provides a connection from the intercity Fresno area to the Sierra Nevada Mountain range. Access points to SR-168 are located at Herndon Avenue, Fowler Avenue, Temperance Avenue, Owens Mountain Parkway, and Shepherd Avenue. Most sections in the study area have limited access (freeway), but sections near Owens Mountain Parkway and Shepherd Avenue have at-grade intersections (highway). The speed limit is generally set at 65 miles per hour (mph) within the study area.

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Source: Kittelson & Associates, Inc., September 4, 2024.

Exhibit 3.16-1
Street Circulation Network

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Expressways

Shepherd Avenue is an east–west expressway that ranges from a two-lane road to a four-lane roadway divided by a median near the SOI Expansion Area, where it provides the southern boundary for the SOI Expansion Area. Newer sections of the road are the four-lane divided sections, while the older, unimproved sections are the two-lane areas. Sidewalks are along the developed south side of the roadway, and conventional bike lanes on each side. Shepherd Avenue connects SR-168 to Willow Avenue at the western edge of the study area. A 0.5-mile segment of Shepherd Avenue between Fowler Avenue and Sunnyside Avenue is not improved and is classified as an arterial. The roadway narrows to two lanes without a median and no bike or walking facilities. Future (or current) development in this area will improve this segment of Shepherd Avenue to be consistent with the rest of the roadway. The speed limit ranges from 50 mph on the divided sections to 40 mph in the two-lane highway section.

Arterials

Willow Avenue runs north to south along the western edge of the study area from Behymer Avenue to Herndon Avenue. Willow Avenue has six lanes divided by a center median. From Shepherd Avenue south, the majority of Willow Avenue has bike lanes and sidewalks on both sides. The Clovis Old Town Trail runs along the Willow Avenue right-of-way from Behymer Avenue to just south of Teague Avenue, where it crosses under Willow Avenue heading southeast. Willow Avenue provides access to central Clovis to the south and the Clovis Community College campus to the north. The speed limit in the vicinity of the SOI Expansion Area (near Shepherd Avenue) is 50 mph.

Clovis Avenue is located west of the Master Plan Area, beginning north of Shepherd Avenue and connecting south to Herndon Avenue. Clovis Avenue is four lanes with a center median with sidewalk and bike lanes on each side. Between Teague Avenue and Alluvial Avenue, the Dry Creek Trail shared-use path shares the right-of-way along the east side of the corridor. The speed limit is 45 mph.

Fowler Avenue runs through the study area classified as a local street, changing to an arterial from Shepherd Avenue south to SR-168. The roadway configuration on Fowler Avenue is mixed due to fronting land uses and undeveloped parcels.

- From Shepherd Avenue to Teague Avenue, there are two lanes in the southbound direction and one lane northbound. A bike lane and sidewalk are located along the majority of this section. The Enterprise shared-use path crosses Fowler Avenue south of Shepherd Avenue and connects with a shared-use path on the west side of Fowler Avenue from the Enterprise Trail crossing to Teague Avenue. The speed limit in this section is 45 mph.
- From Teague Avenue to Nees Avenue, the right-of-way narrows and includes one lane in each direction with no sidewalk and bike facilities. The speed limit is 45 mph.
- From Nees Avenue to SR-168, the cross-section includes four lanes with a center median and bike lanes and sidewalks on each side. The speed limit is 45 mph.

Temperance Avenue begins in the center of the Master Plan Area and runs south to SR-168 and a collection of commercial and residential land uses. The roadway is a four-lane divided road with bike lanes and sidewalks on each side. The speed limit is 50 mph.

De Wolf Avenue runs from Shepherd Avenue south to Owens Mountain Parkway on the eastern edge of the Master Plan Area. The roadway cross-section generally has a single lane in each direction with a center median allowing for turn lanes. Bicycle lanes and sidewalks are provided on each side. De Wolf Avenue provides access from the Master Plan Area to the SR-168 freeway via Owens Mountain Parkway. The speed limit is 40 mph.

Owens Mountain Parkway connects to SR-168 and terminates prior to Nees Avenue without providing a connection under existing conditions. Future plans would extend this roadway to connect to Temperance Avenue at Alluvial Avenue. Owens Mountain Parkway is one lane in each direction with a center median and bike lanes on each side. Sidewalks are intermittent where existing development is located on the western section. The roadway pairs with De Wolf Avenue to provide access from the Master Plan Area to SR-168. There are currently no observed posted speed limit signs.

Nees Avenue runs through the center of the study area, cutting through suburban neighborhoods where the land use shifts east of Clovis Avenue to a more rural and undeveloped landscape. From Willow Avenue to Minnewawa Avenue, the corridor has four lanes with a center turn lane and sidewalk on the majority of both sides. East of Minnewawa Avenue, the corridor is varied with some two-lane undivided sections, divided two-lane sections, and divided three-lane sections. Posted speed limits range from 40 mph to 45 mph.

Herndon Avenue is at the southern edge of the study area and connects SR-168 and the northern parts of Fresno to the west. Herndon Avenue is six lanes with a median. The corridor has sidewalks adjacent to areas of development, with sporadic undeveloped areas that do not have sidewalks. The speed limit is 45 mph.

Collectors

The collector streets vary greatly in their configuration and character, as many traverse through developed neighborhoods and undeveloped land. Collector roadways within the study area are listed in Table 3.16-1. Each street condition is listed as one of the following:

- **Improved**–The majority of the street cross-section has been brought up to current standards and includes sidewalk and bicycle facilities based on context.
- **Unimproved**–The majority of the street cross-section has not been brought to current standards and may not include curbs, sidewalk, or bicycle facilities.
- **Mixed**–The street cross-section is mixed between improved and unimproved conditions, based primarily on the frontage of a developed neighborhood or commercial tract.

Table 3.16-1: Collector Streets

Street Name	Condition
North–South	
Sunnyside Avenue	Mixed
Locan Avenue	Mixed
Peach Avenue	Improved
Armstrong Avenue	Mixed
Leonard Avenue	Improved
Minnewawa Avenue	Improved
East–West	
Teague Avenue	Mixed
Powers Avenue/Dutch Avenue	Improved
Harlan Ranch Avenue	Improved
Highland Avenue	Improved
Tollhouse Road	Unimproved
Alluvial Avenue	Mixed
Source: Kittelson & Associates. 2024. Transportation Impact Analysis (TIA). September 4.	

Local Streets

Within the study area, there are many local streets providing access to residential single-family housing. Many of the local streets within neighborhood developments have sidewalks on both sides of the street; however, streets in less dense residential or undeveloped areas do not. Within the SOI Expansion Area, which is currently outside of the city limits, there are several local streets serving residents. The major local streets within the Master Plan Area are described below.

Behymer Avenue connects the north edge of the Master Plan Area west to Willow Avenue. It has two lanes and no sidewalk or bike facilities. Behymer Avenue is in a rural residential context and is posted at 45 mph.

Fowler Avenue changes character significantly north of Shepherd Avenue. It runs through the center of the SOI Expansion Area and provides rural residential access. Fowler Avenue has two lanes without sidewalk or bike facilities and is posted at 45 mph. It connects the City to the south with Behymer Avenue to the north.

Perrin Avenue is a short east–west street providing rural residential access. It has two lanes without a center stripe and does not have sidewalk or bike facilities. It connects to Sunnyside Avenue and Fowler Avenue. There are no posted speed limit signs.

Sunnyside Avenue north of Shepherd Avenue maintains a rural residential context but does not have a center stripe, sidewalks, or bike facilities. It connects north to Perrin Avenue. There are no posted speed limit signs, but there is an "end 45 speed limit" sign indicating the speed limit is 55 mph per its roadway classification.

Burgan Avenue connects Perrin Avenue south to Shepherd Avenue. It provides rural residential access with two lanes, no center stripe, no sidewalk, and no bike facilities. No speed limit is posted.

Pedestrian Facilities

The Clovis Active Transportation Plan (ATP) assesses and recommends pedestrian facility enhancements, as well as bicycle facilities.[2] Pedestrian facilities are present throughout the study area; however, there are sidewalk gaps present intermittently along some roadways. Longer gaps on collector and arterial roadways include:

- Shepherd Avenue between Willow Avenue and Sunnyside Avenue
- Nees Avenue between Armstrong Avenue and Locan Avenue
- Alluvial Avenue between Fowler Avenue and Armstrong Avenue

Existing sidewalk and sidewalk gaps are shown in Map 7 of the ATP. The ATP provides a prioritized list of sidewalk infill segments. Those within the study area are listed below:

- Nees Avenue from Whittier Avenue to Armstrong Avenue (0.25 mile)
- Alluvial Avenue from Fordham Avenue to west of Renn Avenue (0.14 mile)

Bicycle Facilities

Bicycle facilities are defined by the following four classes:

- Class I–Provides a completely separated facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized.
- Class II–Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited but with vehicle parking and crossflows by pedestrians and motorists permitted.
- Class III–Provides a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.
- Class IV–Provides a restricted right-of-way designated lane for the exclusive use of bicyclists that is separated by a vertical element to provide further separation from motor vehicle traffic.

[2] City of Clovis. 2023. City of Clovis Active Transportation Plan. September. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Engineering/Active%20Transportation%20Plan/PDS-Active-Transportation-Plan-Final-2023.pdf?t=202507181313030&t=202507181313030. Accessed December 22, 2025.

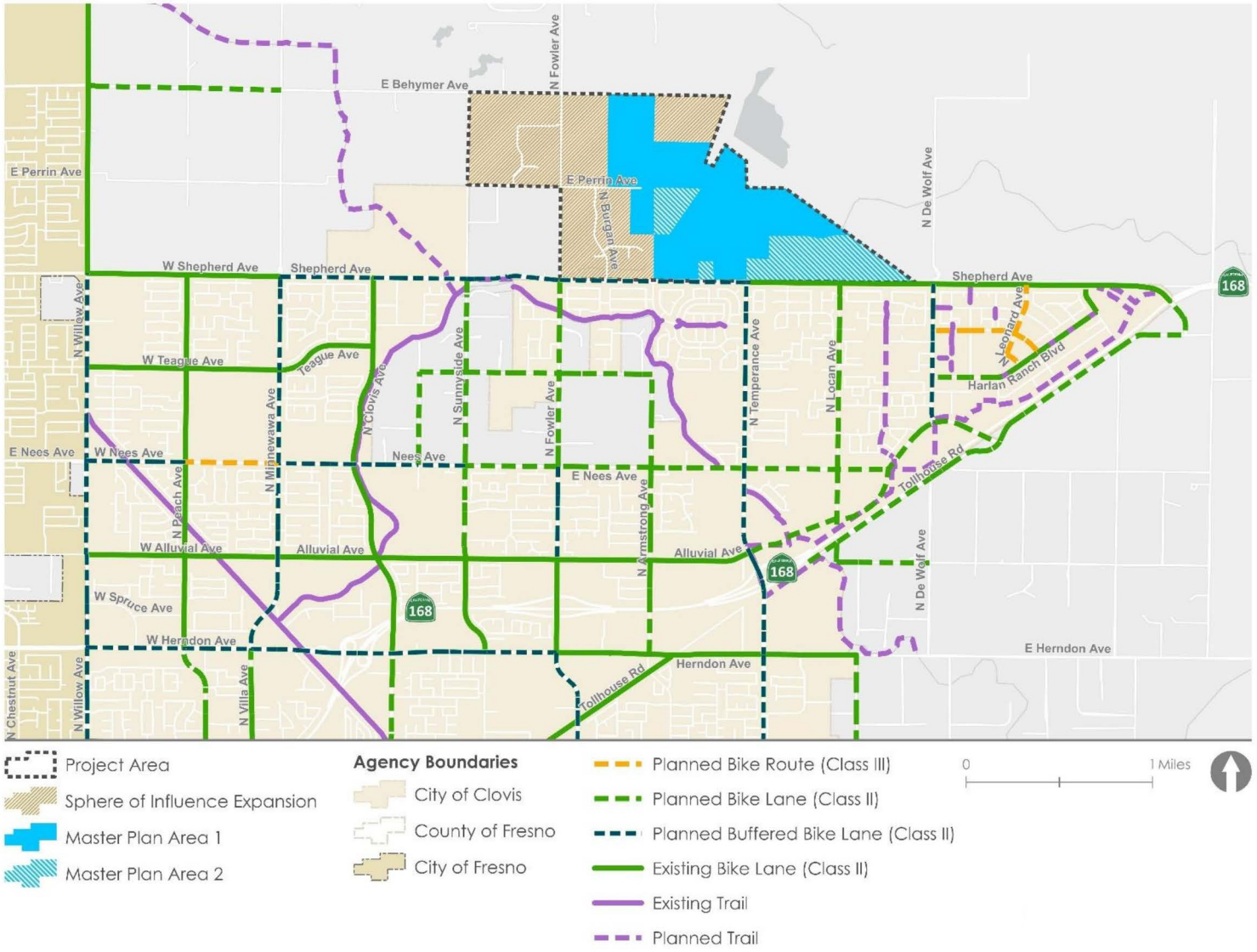
In 2023, the City adopted the ATP, which provides a clear vision for the active transportation network and provides strategies to implement the planned network. The following bikeways are currently present within the study area, but many are at intermittent locations on the listed roads. They are shown graphically in Exhibit 3.16-2.

- Class I Bike Paths
  - Dry Creek Trail (Clovis Avenue)
  - Enterprise Trail
  - Multiple neighborhood trails on east end of the study area
- Class II Bike Lanes
  - Shepherd Avenue
  - Teague Avenue
  - Alluvial Avenue
  - Herndon Avenue
  - Willow Avenue
  - Peach Avenue
  - Clovis Avenue
  - Sunnyside Avenue
  - Fowler Avenue
  - Temperance Avenue
  - Locan Avenue
  - De Wolf Avenue

The ATP includes proposed bike facilities in the study area. They are listed below and shown in Exhibit 3.16-2. The planned alignments aim to fill gaps in the existing network and enhance safety and comfort for people biking.

- Class I Bike Paths
  - Various connections that fill gaps in the existing Class I network are proposed.
- Class II Bike Lanes–Conventional Bike Lane (No Buffer)
  - Behymer Avenue
  - Teague Avenue
  - Nees Avenue
  - Alluvial Avenue
  - Clovis Avenue
  - Marion Avenue
  - Sunnyside Avenue
  - Fowler Avenue
  - Armstrong Avenue
  - Locan Avenue
  - Owens Mountain Parkway
  - Harlan Ranch Boulevard

- Class II Bike Lanes–Buffered Bike Lane
  - Shepherd Avenue
  - Nees Avenue
  - Herndon Avenue
  - Willow Avenue
  - Minnewawa Avenue
  - Fowler Avenue
  - Temperance Avenue
  - De Wolf Avenue
- Class III Bike Routes
  - Nees Avenue
  - Powers/Dutch Avenue
  - Leonard Avenue



Source: Kittelson & Associates, Inc., September 4, 2024.

Exhibit 3.16-2
Existing and Proposed Bike Facilities

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Existing Public Transit Service and Facilities

Fresno Area Express (FAX): FAX provides fixed-route transit services serving the City of Fresno and is the largest transit service provider in the region with almost seven million annual boardings. Handy Ride is the paratransit service provider for the FAX system. Route 3 serves the western edge of the study area along Willow Avenue, terminating at Clovis Community College. Service runs every 30 minutes each day of the week.

Clovis Transit: Clovis Transit is the principal transit service in the City and provides fixed-route and paratransit services. Clovis Transit connects with FAX. Round Up is the paratransit service for the Clovis Transit system. On November 17, 2025, the City introduced new color-coded routes, replacing the old loop routes with a streamlined transit network. North and south routes (Blue, Yellow, Purple, and Pink) run along key streets such as Willow, Clovis, Sunnyside, and Temperance Avenues, while east and west routes (Teal, Red, Green, and Orange) serve Herndon, parts of Barstow, 5th Street, Shaw, and Ashlan Avenues. [3]

Fresno County Rural Transit Agency (FCRTA): FCRTA provides general public transit service to rural communities throughout Fresno County. FCRTA provides both scheduled, fixed-route services with designated bus stops along specific routes, as well as reservation-based, demand-responsive service that offers curb-to-curb transportation. The Auberry transit route provides a connection from the City to the Auberry area foothill communities northeast of the City. The service is demand-responsive and operates one day per week with 24-hour advanced notice.

Existing Traffic Volumes

Weekday intersection vehicle turning movement counts were collected at the study intersections and road segments identified in Section 3.16-14 during the AM peak-hour (7:00 a.m. to 9:00 a.m.) and PM peak-hour (4:00 p.m. to 6:00 p.m.) are presented in the TIA.

Existing Levels of Service

The TIA includes an analysis of the existing operational conditions at the study intersections and road segments. The study locations were found to be operating at acceptable Level of Service (LOS), with the following exceptions:

- Minnewawa and International Avenues (LOS E during the AM peak-hour)
- Minnewawa and Behymer Avenues (LOS F during the AM and PM peak-hours)
- Fowler and Behymer Avenues (LOS E during the AM peak-hour)
- Fowler Avenue and the SR-168 Eastbound Ramps (LOS E during the PM peak-hour)
- Temperance Avenue and the SR-168 Eastbound Ramps (LOS E during the AM peak-hour and LOS F during the PM peak-hour)

[3] City of Clovis. 2025. Clovis Transit – New Routes. Website: https://www.clovisca.gov/services/transit/routes/new_routes.php. Accessed December 22, 2025.

- De Wolf Avenue and Owens Mountain Parkway (LOS E during the AM peak-hour and LOS F during the PM peak-hour)

3.16.3 - Regulatory Framework

Federal

No federal plans, policies, regulations, or laws pertaining to transportation have been determined to be applicable to the proposed project.

State

California Department of Transportation LOS Goals

The California Department of Transportation (Caltrans) builds, operates, and maintains the State highway system, including the interstate highway system. Caltrans's mission is to improve mobility statewide. The department operates under strategic goals to provide a safe transportation system, optimize throughput and ensure reliable travel times, improve the delivery of State highway projects, provide transportation choices, and improve and enhance the State's investments and resources. Caltrans controls the planning of the State highway system and accessibility to the system. Caltrans establishes LOS goals for highways and works with local and regional agencies to assess impacts and develop funding sources for improvements to the State highway system. Caltrans requires encroachment permits from agencies or new development before any construction work may be undertaken within the State's right-of-way. For projects that would impact traffic flow and levels of services on State highways, Caltrans would review measures to mitigate the traffic impacts.

Senate Bill 743

In November 2017, the California Governor's Office of Land Use and Climate Innovation (LCI) released a technical advisory containing recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill (SB) 743. Also in November 2017, LCI released the proposed text for Section 15064.3, "Determining the Significance of Transportation Impacts," which summarizes the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure." LCI recommends that for most instances a per service population threshold should be adopted and that a 15 percent reduction below that of existing development would be a reasonable threshold.

As noted in the LCI Guidelines, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The current deadline for adopting policies to implement SB 743 is July 2020; the change to VMT was formally adopted as part of updates to the CEQA Guidelines in December 2018.

The updated guidelines eliminate the use of automobile delay metrics, such as LOS, from determining significant environmental impacts from vehicle travel. VMT has been identified as the most appropriate

metric to evaluate a project's transportation impacts, as projects that result in lower than average VMT support goals of reducing GHG emissions, while projects that result in higher than average levels of vehicle travel contribute to an increasing rate of GHG emissions.

Although congestion is no longer considered a physical impact on the environment cognizable under CEQA, an EIR must address a project's consistency with a City's plan-level documents. Where, as here, a City's Circulation Element establishes a desired LOS, the EIR should evaluate whether the proposed project would conflict with that policy. In such cases, it is appropriate to note the potential conflict with the City's policy, even though the conflict itself would not constitute a potentially significant environmental effect given the fact that congestion is no longer considered a physical impact on the environment.

Projects that are within 0.5-mile of an existing major transit stop, which is defined as a rail transit station, ferry terminal served by bus or rail transit, or the intersection of two or more major bus routes with service frequencies of 15-minutes or less during the morning and afternoon peak commute periods, are presumed to be less than significant if the project has the following characteristics:

- Has a floor area ratio (FAR) greater than 0.75.
- Does not include more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking).
- Is consistent with the applicable Sustainable Communities Strategy (as determined by the Lead Agency, with input from the Metropolitan Planning Organization [MPO]).
- Does not replace affordable residential units with a smaller number of moderate or high-income residential units.

If a project meets the screening requirements, it is presumed to have a less than significant impact related to VMT.

Regional

Fresno Council of Governments Regional Transportation Plan

The Fresno Council of Governments (Fresno COG) is a voluntary association of local governments and a regional planning agency comprised of 16 member jurisdictions, including the City. The members are represented by a Policy Board consisting of mayors of each incorporated city and the Chairperson of the County Board of Supervisors, or their designated elected official. The Fresno COG's purpose is to establish a consensus on the needs of the Fresno County area and further action plans for issues related to the Fresno County region. The current regional transportation plan, known as the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), was adopted in 2022. The RTP/SCS addresses GHG emission reductions and other air emissions related to transportation, with the goal of preparing for future growth in a sustainable way. The RTP/SCS specifies how funding will be sourced and financed for the region's planned transportation investments, ongoing operations, and maintenance. The goals, objectives, and policies of the RTP/SCS are established to direct the courses of action that will provide efficient, integrated

multimodal transportation systems to serve the mobility needs of people, including accessible pedestrian and bicycle facilities and freight, while fostering economic prosperity and development, and minimizing mobile sources of air pollution. The five main goals of the RTP include:

- **Goal 1:** Improved mobility and accessibility for all.
- **Goal 2:** Vibrant communities that are accessible by sustainable transportation options.
- **Goal 3:** A safe, well-maintained, efficient, and climate-resilient multimodal transportation network.
- **Goal 4:** A transportation network that supports a sustainable and vibrant economy.
- **Goal 5:** A region embracing clean transportation, technology, and innovation.

Fresno Council of Governments Multi-jurisdictional Local Road Safety Plan

The Multi-jurisdictional Local Road Safety Plan (MLRSP) was completed in 2022 and provides an in-depth look at areas of safety concern within the City and other cities within the planning area. The report identifies priority segments and intersections in the City and potential crash reduction treatments to apply. The MLRSP also provides strategies for education, enforcement, engineering, and emergency services to improve safety outcomes.

Intersections near the Master Plan Area, which were identified in the 95th percentile of Crash Severity Scores, include:

- Shepherd Avenue at Minnewawa Avenue
- Shepherd Avenue at De Wolf Avenue (western intersection)

Fresno County Congestion Management Process

In June 1990, California voters approved legislation that required Congestion Management Plans be developed in urbanized counties to address congestion on California's highways and roads. The Fresno County Congestion Management Process (CMP) implements this requirement, and its responsibilities include providing information on transportation system performance and assessing alternative strategies for alleviating congestion and improving mobility for people and goods to levels that meet State and local needs. The Fresno County CMP identifies four general objectives:

1. Optimize the transportation facilities through efficient system management;
2. Invest in strategies that reduce travel demand, improve system performance, increase safety, and provide effective incident management;
3. Reduce VMT by encouraging alternative modes of transportation and promotion of sustainable land use development; and
4. Improve public transit, extend bicycle and pedestrian systems, and promote car-sharing and bike-sharing programs to facilitate the development of an integrated multimodal transportation system in the Fresno region.

Local

City of Clovis General Plan

The City of Clovis General Plan (General Plan) includes several policies that are relevant to transportation and circulation and applicable to the proposed project. The General Plan Circulation Element policies are identified below:[4]

Circulation Element

Policy 1.1 Multimodal network. The City shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.

Policy 1.2 Transportation decisions. Decisions should balance the comfort, convenience, and safety of pedestrians, bicyclists, and motorists.

Policy 1.3 Age and mobility. The design of roadways shall consider all potential users, including children, seniors, and persons with disabilities.

Policy 1.4 Jobs and housing. Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles traveled and effectively utilize the existing transportation infrastructure, as well as promote carpooling whenever possible.

Policy 1.5 Neighborhood connectivity. The transportation network shall provide multimodal access between neighborhoods and neighborhood-serving uses (educational, recreational, or neighborhood commercial uses).

Policy 1.6 Internal circulation. New development shall utilize a grid or modified-grid street pattern. Areas designated for residential and mixed-use village developments should feature short block lengths of 200 to 600 feet.

Policy 1.7 Narrow streets. The City may permit curb-to-curb dimensions that are narrower than current standards on local streets to promote pedestrian and bicycle connectivity and enhance safety.

Policy 1.8 Network completion. New development shall complete the extension of stub streets planned to connect to adjacent streets, where appropriate.

Policy 2.1 Level of Service. The following is the City's Level of Service (LOS) standards:

A. Achieve LOS D vehicle traffic operations during the AM and PM peak-hours

[4] City of Clovis. 2014. City of Clovis General Plan. Circulation Element. August 25. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/circulation_element.php. Accessed February 13, 2025.

B. Allow exceptions on a case-by-case basis where lower levels of service would result in other public benefits, such as:
   i. Preserving agriculture or open space land
   ii. Preserving the rural/historic character of a neighborhood
   iii. Preserving or creating a pedestrian-friendly environment in Old Town or mixed-use village districts
   iv. Avoiding adverse impacts to pedestrians, cyclists, and mass transit riders
   v. Where right-of-way constraints would make capacity expansion infeasible

Policy 2.2 Multimodal LOS. Monitor the evolution of Multimodal Level of Service (MMLOS) standards. The City may adopt MMLOS standards when appropriate.

Policy 2.3 Fair share costs. New development shall pay its fair share of the cost for circulation improvements in accordance with the City's traffic fee mitigation program.

Policy 2.4 Right-of-way dedication. The City may require right-of-way dedication essential to the circulation system in conjunction with any development or annexation. The City shall request the County of Fresno to apply the same requirements in the Clovis planning area.

Policy 2.5 Regional and State roadway funding. Coordinate with the County of Fresno, City of Fresno, Fresno Council of Governments, and Caltrans to fund roadway improvements adjacent to and within the City's Planning Area.

Policy 2.6 Vehicle Miles Traveled. Development projects shall comply with the City's VMT Transportation Analysis Guideliens and provide the appropriate VMT mitigation measures as determined through the analysis.

Policy 3.1 Traffic calming. Employ traffic calming measures in new developments and existing neighborhoods to control traffic speeds and maintain safety.

Policy 3.2 Neighborhood compatibility. Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.

Policy 3.3 Old Town and mixed-use village centers. Transportation decisions on local streets in Old Town and mixed-use village centers shall prioritize pedestrians, then bicyclists, then mass transit, then motorists.

Policy 3.4 Road diets. Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.

Policy 3.5 Roadway widening. Only consider street widening or intersection expansions after considering multimodal alternative improvements to non-automotive facilities.

Policy 3.6 Soundwalls. Design roadway networks to disperse traffic to minimize traffic levels. Discourage soundwalls along new collector and local streets when feasible.

Policy 3.7 Conflict points. Minimize the number of and enhance safety at vehicular, pedestrian, and bicycle conflict points.

Policy 3.8 Access management. Minimize access points and curb cuts along arterials and prohibit them within 200 feet of an intersection where possible. Eliminate and/or consolidate driveways when new development occurs or when traffic operation or safety warrants.

Policy 3.10 Pedestrian access and circulation. Entrances at signalized intersections should provide sidewalks on both sides of the entrance that connect to an internal pedestrian pathway to businesses and throughout nonresidential parking lots larger than 50 spaces.

Policy 3.11 Right-of-way design. Design landscaped parkways, medians, and rights-of-way as aesthetic buffers to improve the community's appearance and encourage non-motorized transportation.

Policy 3.12 Residential orientation. Where feasible, residential development should face local and collector streets to increase visibility and safety of travelers along the streets and encourage pedestrian and bicycle access.

Policy 4.1 Bike and transit backbone. The bicycle and transit system should connect Shaw Avenue, Old Town, the Medical Center/R&T Park, and the three Urban Centers.

Policy 4.2 Priority for new bicycle facilities. Prioritize investments in the backbone system over other bicycle improvements.

Policy 4.3 Freeway crossings. Require separate bicycle and pedestrian crossings for new freeway extensions and encourage separate crossings where Class I facilities are planned to cross existing freeways.

Policy 4.4 Bicycles and transit. Coordinate with transit agencies to integrate bicycle access and storage into transit vehicles, bus stops, and activity centers.

Policy 4.5 Transit stops. Improve and maintain safe, clean, comfortable, well-lit, and rider-friendly transit stops that are well marked and visible to motorists.

Policy 4.6 Transit priority corridors. Prioritize investments for, and transit services and facilities along the transit priority corridors.

Policy 4.7 Bus rapid transit. Plan for bus rapid transit and transit-only lanes on transit priority corridors as future ridership levels increase.

Policy 5.1 Complete street amenities. Upgrade existing streets and design new streets to include complete street amenities, prioritizing improvements to bicycle and pedestrian connectivity or safety, consistent with the Bicycle Transportation Master Plan and other master plans.

Policy 5.2 Development-funded facilities. Require development to fund and construct facilities as shown in the Active Transportation Plan when facilities are in or adjacent to the development.

Policy 5.3 Pathways. Encourage pathways and other pedestrian amenities in Urban Centers and new developments of 10 acres or larger.

Policy 5.4 Homeowner associations. The City may require homeowner associations to maintain pathways and other bicycle and pedestrian facilities within the homeowner association area.

Policy 5.5 Pedestrian access. Require sidewalks, paths, and crosswalks to provide access to schools, parks, and other activity centers and to provide general pedestrian connectivity throughout the City.

Policy 6.1 Truck routes. Plan and designate truck routes that minimize truck traffic through or near residential areas.

Policy 6.2 Land use. Place industrial and warehousing businesses near freeways and truck routes to minimize truck traffic through or near residential areas.

Policy 8.4 Connectivity between residential and commercial. Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.

Policy 8.6 Employer commute programs. Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

City of Clovis Active Transportation Plan

The Clovis ATP was adopted in Fall 2023 and provides a vision for the City to complete a network of walking, biking, and shared-use trail facilities that are convenient, safe, and easy to use. The network should support and encourage travel between and within neighborhoods. The ATP developed recommended bicycle, pedestrian, and trail networks and prioritized projects to meet the greatest needs more quickly. These prioritized projects were guided by the goals of the plan, which are listed below:

- Safety and Comfort–Improve the safety of people walking and biking.
- Connectivity–Develop a well-connected network of trails, walkways, and bikeways.

- Mode Shift–Increase the share of people who walk or ride a bike to get to work, school, shopping, and other activities.
- Equity–Create a network that allows people of all physical abilities and socioeconomic circumstances the ability to travel safely throughout the City without a car.
- Recreation–Increase access to recreation by providing access to trails, walkways, and bikeways.

City of Clovis Transportation Impact Analysis Guidelines

The Clovis Transportation Impact Analysis Guidelines (TIA Guidelines) were adopted October 17, 2022, and provide guidance to City staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the City for the purpose of determining impacts under CEQA. The TIA Guidelines are intended to:

- promote conformance with applicable City and State regulations;
- provide evaluation consistent with CEQA;
- ensure consistency in preparation of studies by applicants and consultants; and
- provide predictability in content for City staff and the public in reviewing studies.

The TIA Guidelines address the requirements for a CEQA VMT impact analysis and a local TIA. A CEQA analysis of transportation impacts consists of evaluation measures, including conflicts with circulation policies, VMT, hazards, and emergency access. The quantitative methodology, significance thresholds, and mitigation measures for conducting the transportation analysis in accordance with the requirements of SB 743 are primarily based on VMT metrics. The CEQA analysis is part of the environmental review process and must meet CEQA requirements.

The City can require a local transportation analysis to address traffic operations, safety issues, and needed project design features related to a proposed land use project, as well as analyze site access and internal circulation. The local transportation analysis may be used to assess transportation impacts in relation to the City's policies in the General Plan and other planning documents.

3.16.4 - Methodology

Trip Generation

Table 3.16-2 presents trip generation estimates for the Master Plan.

Table 3.16-2: Project Trip Generation

Land Use	Units	Daily Trips	AM Peak-hour Trips			PM Peak-hour Trips		
			Entering	Exiting	Total	Entering	Exiting	Total
Vista Ranch Development/MP Area 1								
Single-family Residential	2,194	20,692	400	1,138	1,538	1,302	764	2,066
Multi-family Residential	524	3,533	51	160	211	169	99	268
Park	8.02 acres	8	4	0	4	4	0	4
Community Recreation Center	4,000 sf	116	5	3	8	5	5	10
Commercial	85,000 sf	5,740	92	56	148	217	225	442
Development Subtotal:	–	*30,089*	*552*	*1,357*	*1,909*	*1,696*	*1,094*	*2,790*
Development Residential Only Subtotal:	–	*24,225*	*451*	*1,298*	*1,749*	*1,470*	*864*	*2,334*
MP Area 2								
Single-family Residential	450	4,244	82	233	315	266	157	423
Commercial	115,000 sf	7,765	123	76	199	293	304	597
School	750 students	1,703	300	255	555	55	65	120
Master Plan Area 2 Subtotal:	–	*13,712*	*505*	*564*	*1,069*	*614*	*526*	*1,140*
Master Plan Area (MP Area 1 and 2 combined)								
Grand Total:	**–**	**43,801**	**1,055**	**1,923**	**2,978**	**2,308**	**1,622**	**3,930**
Residential Only Total:	**–**	**28,469**	**532**	**1,532**	**2,064**	**1,737**	**1,020**	**2,757**

Notes:
MP = Master Plan
sf = square feet
Source: Peters Engineering Group. 2025.

Vehicle Miles Traveled

The Fresno COG activity-based travel demand model was used to estimate base year (2019) VMT for the Traffic Analysis Zones (TAZs) that comprise the proposed project.

Local Transportation Analysis Study Area

The study area is intended to include transportation facilities that would be expected to be affected by the development of the proposed project. Consistent with Clovis TIA Guidelines, the study area includes:

- Pedestrian, bicycle, and transit facilities within a 0.5-mile distance from the project site boundary
- All intersections of major streets that would provide direct access to the project site
- Signalized intersections within 0.5 mile of the project site boundary where the proposed project would add 50 or more peak-hour trips, and signalized intersections beyond 0.5 mile where the proposed project would add 100 or more peak-hour trips
- Unsignalized intersections within 0.5 mile of the project site boundary where the proposed project would add more than 50 peak-hour trips

The transportation analysis evaluates peak-hour traffic operations at the 44 study intersections listed in Table 3.16-3.

Table 3.16-3: Study Intersections

Study Intersection	Study Intersection
1. Willow Avenue and International Avenue	25. Fowler Avenue and Alluvial Avenue
2. Willow Avenue and Behymer Avenue	26. Fowler Avenue and SR-168 WB Ramps
3. Willow Avenue and Shepherd Avenue	27. Fowler Avenue and SR-168 EB Ramps
4. Minnewawa Avenue and International Avenue	28. Perrin Road and Burgan Avenue
5. Minnewawa Avenue and Behymer Avenue	29. Burgan Avenue and Shepherd Avenue
6. Minnewawa Avenue and Shepherd Avenue	30. Armstrong Avenue and Shepherd Avenue
7. Clovis Avenue and International Avenue (Future)	31. Temperance Avenue and Shepherd Avenue
8. Clovis Avenue and Behymer Avenue (Future)	32. Nees Avenue and Temperance Avenue
9. Clovis Avenue and Shepherd Avenue	33. Temperance Avenue and Alluvial Avenue
10. Clovis Avenue and Nees Avenue	34. Temperance Avenue and SR-168 WB Ramps
11. Clovis Avenue and Alluvial Avenue	35. Temperance Avenue and SR-168 EB Ramps
12. Clovis Avenue and Herndon Avenue	36. Locan Avenue and Shepherd Avenue
13. SR-168 EB Ramps and Herndon Avenue	37. Locan Avenue and Nees Avenue
14. SR-168 WB Ramps and Herndon Avenue	38. Locan Avenue and Owens Mountain Parkway
15. Sunnyside Avenue and Behymer Avenue (Future)	39. De Wolf Avenue and Shepherd Avenue
16. Sunnyside Avenue and Shepherd Avenue	40. De Wolf Avenue and Owens Mountain Parkway
17. Sunnyside Avenue and Nees Avenue	41. Owens Mountain Parkway and SR-168

Study Intersection	Study Intersection
18. Sunnyside Avenue and Alluvial Avenue	4101. Owens Mountain Parkway and SR-168 WB Ramps (Future)
19. Sunnyside Avenue and Herndon Avenue	4102. Owens Mountain Parkway and SR-168 EB Ramps (Future)
20. Fowler Avenue and Behymer Avenue	42. Shepherd Avenue and SR-168
21. Fowler Avenue and Perrin Road (Future)	4201. Shepherd Avenue and SR-168 WB Ramps (Future)
22. Fowler Avenue and Shepherd Avenue	4202. Shepherd Avenue and SR-168 EB Ramps (Future)
23. Fowler Avenue and Teague Avenue	43. Project Access South and Shepherd Avenue (Future)
24. Fowler Avenue and Nees Avenue	44. Project Access North and Behymer Avenue (Future)

Notes:
EB = eastbound
SR = State Route
WB = westbound
Source: Kittelson & Associates. September 4, 2024.

Intersection operations control the operations of the roadway segments under most circumstances. However, a roadway segment analysis may be used to identify traffic operation characteristics for rural roadways that do not have frequent intersections. The scoping memorandum proposed the following roadway segments for evaluation due to their rural nature and limited number of intersections:

1. Behymer Avenue from Willow Avenue to Minnewawa Avenue
2. Behymer Avenue from Minnewawa Avenue to Sunnyside Avenue
3. Behymer Avenue from Sunnyside Avenue to Fowler Avenue
4. Behymer Avenue from Fowler Avenue to Project Access North
5. Fowler Avenue from Behymer Avenue to Shepherd Avenue
6. Fowler Avenue from Shepherd Avenue to Teague Avenue
7. Fowler Avenue from Teague Avenue to Nees Avenue

Study Area Levels of Service

As noted above, LOS is primarily evaluated to determine consistency with the City's General Plan Circulation Element, even though congestion is not itself considered a physical impact on the environment for purposes of CEQA. The local transportation analysis identifies the effects of the proposed project on traffic operations in terms of vehicle delay and LOS, queueing issues, and signal warrants.

Levels of service are generally defined as follows:

A represents free-flow travel with excellent level of comfort and convenience and the freedom to maneuver.

B represents stable operating conditions, but the presence of other road users causes a noticeable, though slight, reduction in comfort, convenience, and maneuvering freedom.

C represents stable operating conditions, but the operation of individual users is substantially affected by the interaction with others in the traffic stream.

D represents high-density, but stable flow. Users experience severe restriction in speed and freedom to maneuver, with poor levels of comfort and convenience.

E represents operating conditions at or near capacity. Speeds are reduced to a low but relatively uniform value. Freedom to maneuver is difficult with users experiencing frustration and poor comfort and convenience. Unstable operation is frequent, and minor disturbances in traffic flow can cause breakdown conditions.

F represents forced or breakdown conditions. This condition exists when volume of traffic exceeds the capacity of the roadways. Long queues form and stop-and-go traffic becomes the norm.

Safety

The local transportation analysis provides a summary of quantifiable crash history, identifies locations of concern, and provides recommendations for locations where improvements are expected to improve crash rates.

Cumulative Analysis

The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to transportation. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular CEQA threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.16.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to establish thresholds of significance to determine whether impacts to transportation are significant environmental effects. As such, the City has determined that the proposed project would have a potential impact if it would:

a) Conflict with a program, plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

d) Result in inadequate emergency access.

3.16.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the proposed project and provides mitigation measures where necessary.

Effect to Circulation System

Impact TRANS-1: The proposed project would not conflict with a program plan, ordinance or policy of the circulation system, including transit, roadways, bicycle and pedestrian facilities.

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and, as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Therefore, no conflict with a program plan, ordinance, or policy of the circulation system could occur, and there would be no impact.

MP Area 2 and Vista Ranch Development/MP Area 1

Fresno COG Regional Transportation Plan/Sustainable Communities Strategy

The goals, objectives, and policies of the RTP/SCS are established to direct the courses of action that will provide efficient, integrated multimodal transportation systems to serve the mobility needs of people, including accessible pedestrian and bicycle facilities, and freight, while fostering economic prosperity and development, and minimizing mobile sources of air pollution. The proposed project's objectives include providing infrastructure that meets City standards and is integrated with existing and planned facilities while also providing a strong pedestrian network to link local commercial and neighborhood together. This is consistent with the RTP/SCS since it would be accessible, provide a safe multimodal transportation network, and support a sustainable and vibrant economy by providing housing types, sizes, and densities that provide for local and regional housing needs.

Fresno COG Multi-jurisdictional Local Road Safety Plan

The MLRSP identifies priority intersections and segments and potential reduction treatments to improve the safety of transportation infrastructure with the highest crash severity scores. Two of the intersections identified are within the study area for the transportation analysis. Since the proposed

project is not proposing modification at the two identified intersections, the proposed project would not interfere with the implementation of the MLRSP.

Fresno County Congestion Management Process

The CMP is responsible for monitoring the transportation infrastructure and developing deficiency plans to improve the transportation infrastructure that is not meeting standards. The project applicant proposes to develop a Master Plan Area that is not anticipated to affect intersections and roadway segments that are not internal or abutting the proposed project. There are no anticipated design features that would prevent the normal analysis and deficiency reporting for the CMP.

City of Clovis General Plan

The proposed project is generally consistent with the overarching goals and objectives of the Circulation Element of the City's General Plan, including those that promote multimodal transportation, pedestrian and bicycle connectivity, and transit-oriented development. The proposed project includes features such as enhanced pedestrian infrastructure, improved bicycle access, and proximity to existing transit services, which align with the General Plan's goals for reducing vehicle dependence and encouraging sustainable mobility.

Although the proposed project may not fully align with every individual policy or guideline in the Circulation Element, under CEQA, the Lead Agency has the discretion to determine whether a project is consistent with applicable plans and whether any inconsistencies would result in a potentially significant environmental impact. The proposed project is anticipated to result in localized impacts to intersection operations with projected LOS falling below the thresholds established in Policy 2.1 of the Circulation Element as detailed in the TIA and the Supplemental Traffic Analyses included in Appendix K. However, automobile delay (measured as LOS) is not itself considered a significant impact on the environment following the adoption of SB 743. The proposed project supports the development of a multimodal transportation network by incorporating enhanced pedestrian infrastructure, improved bicycle access, and proximity to existing transit services. These features promote safe and convenient travel for all users, including pedestrians, bicyclists, transit riders, and motorists, consistent with Policy 1.1. The proposed project's street network is designed with a grid or modified-grid pattern and a high intersection density, which facilitates neighborhood connectivity and internal circulation in accordance with Policies 1.5 and 1.6.

The proposed project also prioritizes the construction of bicycle and pedestrian facilities, including approximately 4.5 miles of Class I separated trails and new sidewalks, directly advancing Policies 5.1, 5.2, and 5.5. By accommodating future bus stops and contributing to expanded transit service through development fees, the proposed project aligns with transit-oriented development goals outlined in Policies 4.4 and 4.5. Additionally, the proposed project ensures that new development pays its fair share for circulation improvements and coordinates with regional agencies for roadway funding, supporting Policies 2.3 and 2.5.

The City's safety policies are advanced through intersection improvements, installation of traffic signals, and enhanced visibility measures at locations with higher crash rates, consistent with Policies 3.1 and 3.7.

In this context, the proposed project is considered generally consistent with the Circulation Element because it advances the broader goals of mobility, accessibility, and environmental sustainability. For informational purposes, the LOS impacts are disclosed, although such impacts are no longer considered environmental impacts. Furthermore, any such impacts do not preclude the proposed project's overall alignment with the General Plan's transportation vision. Potential impacts related to MP Areas 1 and 2 are therefore less than significant.

City of Clovis Active Transportation Plan

The ATP identifies roadways where planned bicycle and pedestrian infrastructure will be implemented. In addition to providing internal roadways that provide multimodal streets per the General Plan, the proposed project would be required to improve its frontage, which would help the ATP in filling in gaps in the bicycle and pedestrian network, such as along Shepherd Avenue. The proposed project is not anticipated to affect transportation infrastructure away from the boundaries in a way that would prevent the proposed network in the ATP from being completed.

Conclusion

As discussed above, the proposed project is generally consistent with all of the applicable plans and policies and ordinances of the transportation systems, and impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Cumulative Year 2046 Operational Analyses with Full Master Plan

The cumulative analyses included the assumption that certain improvements would be constructed by the year 2046 as presented in the TIA and Supplemental Traffic Analyses. These improvements are consistent with the General Plan.

The analyses identified several intersections that are expected to operate worse than the target LOS in the cumulative year 2046 condition with the construction of the entirety of the Master Plan and the improvements detailed in the TIA and the Supplemental Traffic Analyses.

As described above, the proposed project is generally consistent with the overarching goals and objectives of the Circulation Element of the City's General Plan, including those that promote multimodal transportation, pedestrian and bicycle connectivity, and transit-oriented development. The proposed project includes features such as enhanced pedestrian infrastructure, improved bicycle access, and proximity to existing transit services, which align with the General Plan's goals for reducing vehicle dependence and encouraging sustainable mobility.

Although the proposed project may not fully align with every individual policy or guideline in the Circulation Element, under CEQA, the Lead Agency has the discretion to determine whether a project is consistent with applicable plans and whether any inconsistencies would result in a potentially significant environmental impact. The proposed project is anticipated to result in localized impacts to intersection operations, with projected LOS falling below the thresholds established in Policy 2.1 of the Circulation Element. However, automobile delay (measured as LOS) is not considered a significant impact on the environment following the adoption of SB 743. In this context, the proposed project is considered generally consistent with the Circulation Element because it advances the broader goals of mobility, accessibility, and environmental sustainability. For informational purposes, the LOS impacts are disclosed and do not preclude the proposed project's overall alignment with the General Plan's transportation vision. Therefore, the proposed project would not result in a cumulatively considerable contribution to the potentially significant cumulative impact, and cumulative impacts are less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No potential to contribute to cumulative impact.
MP Area 2: Less than cumulatively considerable contribution.
Vista Ranch Development/MP Area 1: Less than cumulatively considerable contribution.

Mitigation Measures

None.

Conflict with CEQA Guidelines Section 15064.3 Subdivision (b)

Impact TRANS-2: The proposed project would not be consistent with CEQA Guidelines Section 15064.3, subdivision (b).

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in any increase in VMT. As such, no impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Significance criteria "b" is related to the implementation of VMT as the primary performance metric. The following criteria are used to assess a significant impact related to VMT consistent with the TIA Guidelines:

- Residential–A proposed project exceeding a level of 13 percent below the existing average VMT per capita in Fresno County.
  - Regional Average: 16.1 VMT/capita
  - Impact Threshold: 14.1 VMT/capita
- Office–A proposed project exceeding a level of 13 percent below the existing average VMT per employee in Fresno County.
  - Regional Average: 25.6 VMT/employee
  - Impact Threshold: 22.3 VMT/employee
- Retail–A net increase in total VMT. The total VMT for the region without and with the proposed project is calculated. The difference between the two scenarios is the net change in total VMT that is attributable to the proposed project.

The Fresno COG activity-based travel demand model was used to estimate base year (2019) VMT for the TAZs that comprise the proposed project. Table 3.16-4 presents VMT per capita and VMT per employee findings for base year conditions in Fresno County and for the proposed project at buildout. The proposed project is considered to have a significant impact if the VMT per capita or VMT per employee of the proposed project exceeds a threshold based on 13 percent below the regional averages for Fresno County.

Table 3.16-4: VMT Per Capita and Per Employee

	VMT Per Capita	VMT Per Employee
Fresno County	16.1	25.6
Impact Threshold (13% Below Regional Average)	14.1	22.3
Project Area	30.4	44.3
Percent Compared to Impact Threshold	+116%	+99%
Significant Impact	Yes	Yes

Notes:
VMT = Vehicle Miles Traveled
Source: Kittelson & Associates. 2024. Transportation Evaluation.

The discussion above addresses VMT impacts associated with both the residential and employment components of the proposed Master Plan. The following analysis separately evaluates the Master Plan's retail uses to clarify their distinct contribution to total regional VMT. Table 3.16-5 lists the total regional daily VMT for the base year with the proposed project, both with and without the retail

commercial component. The total regional VMT is projected to decrease with the addition of retail commercial uses within the proposed project. This indicates that the proposed retail uses would provide services close to residents and reduce the need to make longer trips to access services.

Table 3.16-5: Regional VMT Without and With Retail

	Total Regional Daily VMT
With Project Without Retail	22,029,977
With Project With Retail	22,026,474
Difference	-3,503
Significant Impact	No

Notes:
VMT = Vehicle Miles Traveled
Source: Kittelson & Associates, Transportation Evaluation, 2024.

In sum, the proposed project would exceed the impact thresholds for both residential and employment land uses. This would have a significant impact for residential and employment uses. However, the proposed project's retail uses would decrease total regional VMT, indicating a less than significant impact for retail uses.

Comments were raised during the NOP process asserting that, if residential development occurs prior to the construction of commercial uses, traffic impacts could worsen due to the unavailability of pass-through trips. As a result of these comments, this Revised Draft EIR also conservatively evaluates VMT in the event development of commercial uses does not occur in the near-term. During the interim period when no retail uses have been constructed (residential only), the residential VMT per capita is estimated to be 31.0, compared to 30.4 with passthrough trips associated with the proposed commercial retail development, as noted above. The 31.0 VMT per capita value is derived from the Supplemental Traffic Analyses prepared by Peters Engineering Group (Appendix K.3), which modeled VMT under an interim condition in which residential development occurs prior to construction of commercial uses. Under either scenario, the proposed project would result in a significant impact for residential uses similar to that described above.

Mitigation for VMT impacts for residential and employment uses would include project design features, compliance with existing regulations, and Mitigation Measure (MM) TRANS-2. The potential effectiveness of mitigation measures for VMT has been estimated using the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity.

The proposed project, along with the recommended mitigation measures, addresses (either directly or indirectly) at least 17 of the CAPCOA measures as listed in Table 3.16-6.

Table 3.16-6: Project-Related CAPCOA Measures

ID	CAPCOA Measure	ID	CAPCOA Measure
T-3	Provide Transit-oriented Development	T-17	Improve Street Connectivity
T-5	Implement Commute Trip Reduction Program (Voluntary)	T-18	Provide Pedestrian Network Improvement
T-6	Implement Commute Trip Reduction Program (Mandatory Implementation and Monitoring)	T-19-A	Construct or Improve Bike Facility
T-7	Implement Commute Trip Reduction Marketing	T-20	Expand Bikeway Network
T-8	Provide Ride Sharing Program	T-25	Extend Transit Network Coverage or Hours
T-9	Implement Subsidized or Discounted Transit Program	T-27	Implement Transit-Supportive Roadway Treatments
T-10	Provide End-of-Trip Bicycle Facilities	T-46	Provide Transit Shelters
T-11	Provide Employer-Sponsored Vanpool	T-56	Active Modes of Transportation for Youth
T-14	Provide Electric Vehicle Charging Infrastructure		

Notes:
CAPCOA = California Air Pollution Control Officers Association
Source: California Air Pollution Control Officers Association (CAPCOA), October 2024.

The CAPCOA Handbook Measure T-5 estimates that a voluntary commute trip reduction program can reduce commute VMT by up to 4.0 percent with full participation of all eligible employees. Commute VMT to and from employers within the Master Plan Area is projected to account for a maximum of 7.5 percent of total VMT. Therefore, the maximum VMT reduction from a commute trip reduction program would be 4.0 percent times 7.5 percent, or 0.3 percent VMT reduction. This measure would be required by MM TRANS-2, below.

The CAPCOA Handbook Measure T-10 estimates that provision of end-of-trip bicycle facilities can reduce commute VMT by up to 4.4 percent, depending on the existing propensity for commuters to use bicycles. The potential VMT reduction for employers in the City is estimated at 0.61 percent. Commute VMT to and from employers within the Master Plan Area is projected to account for a maximum of 7.5 percent of total VMT. Therefore, the maximum VMT reduction from bicycle end-of-trip facilities would be 0.61 percent times 7.5 percent or 0.05 percent VMT reduction. The proposed project is required to incorporate bicycle storage for nonresidential uses in accordance with City of Clovis Municipal Code (CMC) Section 9.32.090, Bicycle storage requirements.

Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in VMT. CAPCOA Handbook Measure T-17 uses increased vehicle intersection density as a proxy for street connectivity improvements. The CAPCOA Handbook estimates that VMT can be reduced up to 30 percent if a development provides a street grid that has much greater

density (up to about three times) of streets and street intersections than the average American street grid density of 36 street intersections per square mile.

The proposed Master Plan would provide approximately 53 intersections within the Master Plan Area that would provide direct network connectivity connecting clusters of housing with other clusters and the main street network. The total Master Plan Area is approximately 507 acres (0.79 square miles), resulting in an average intersection density of about 67 street intersections per square mile, providing street network connectivity for all modes of travel. The proposed intersection density would be 86 percent higher than the American average. Therefore, consistent with CAPCOA Handbook Measure T-17, the proposed street grid would be expected to provide up to a 12 percent reduction in VMT compared to typical development areas.

The proposed site plan shows that many of the local streets and residences would be separated from the collectors and arterials within the Master Plan Area by walls or fencing except at a relatively small number of vehicle access intersections. Adding additional bicycle and pedestrian access points through these walls or fences to facilitate more direct pedestrian and bicycle connections has the potential to reduce VMT by providing more direct paths of travel between the various neighborhoods for non-auto modes.

The proposed project also proposes to add approximately 4.5 miles of Class I separated trails. This would increase the mileage of bicycle facilities in the City from the existing approximately 21.2 miles to 25.7 miles, an increase of approximately 21 percent. The CAPCOA Handbook Measure T-20 estimates that a 21 percent increase in bike network mileage could reduce citywide VMT by 0.01 percent. The total daily VMT generated in the City is approximately 4,285,900, so the proposed project's bike network would reduce daily VMT by approximately 350. This would represent a 0.2 percent reduction from the proposed project's unmitigated total daily VMT of 188,900. Note that these VMT reductions would occur citywide and would not exclusively affect proposed project trips.

Implementation of expanded transit service would require both capital expenditures for support facilities, including construction of transit stops and facilitating extensions of future transit routes. The proposed project would be required to pay applicable development impact fees, which would be used to support the extension of transit services to the Master Plan Area. The proposed project has also taken into account the extension of transit routes and would provide two transit stops within the Master Plan Area. The proposed transit stop locations would provide a natural extension of the existing City transit routes on Temperance Avenue. The CAPCOA Handbook Measure T-25 estimates that a 25 percent increase in transit service hours could reduce citywide VMT by 0.3 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so the expanded transit network would reduce daily VMT by approximately 12,600. This would represent a 6.7 percent reduction from the proposed project's unmitigated total daily VMT of 188,900. Note that these VMT reductions would occur citywide and would not exclusively affect proposed project trips.

The proposed project has incorporated all feasible VMT-reducing project features, regulations, and mitigation measures. However, other communities (primarily in denser regions with different climates) have incorporated other mitigation measures, such as those identified in Table 3.16-6. However, the

Supplemental Traffic Memorandum determined that such mitigation measures would not be effective in reducing VMT for the proposed project. Specifically, the geography, development, and climate in the Clovis/Fresno region, and essentially the entirety of the San Joaquin Valley, are not conducive to residents being able to commute to work, perform the required shopping, and make other trips (such as health care or entertainment) via means of transportation such as walking, bicycling, or mass transit at the scale or volume that would reduce VMT by any more than a *de minimis* level. As the Clovis/Fresno region is not a dense city with high-rise residential, office, health care, and shopping all within close proximity, and with high heat in the summer and cold/rain/fog in the winter, simply providing for and promoting active transportation and transit opportunities does not generally result in a noticeable reduction in the number of vehicle miles residents must travel per day. The regional transit system has not been developed to the extent that a majority of residents are willing to utilize it; therefore, on a project level, providing additional transit facilities, including the measures identified in Table 3.16-6, would not be effective in reducing VMT in anything other than *de minimis* levels. Likewise, carpooling has been promoted for several decades with minimal benefit, as many employees tend to work different hours, do not live near each other, are required to attend appointments, or continue to enjoy the independence and opportunity to run other errands during the commute. For these reasons, additional VMT mitigation measures, including those identified in Table 3.16-6, would likely not be effective in reducing the proposed project's VMT. As such, impacts would be significant and unavoidable even with all feasible mitigation incorporated.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.

MP Area 2: Potentially significant impact.

Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM TRANS-2 Future employers within the Master Plan Area shall implement a voluntary commute trip reduction program, consistent with other trip reduction programs in the City of Clovis (City). Such programs shall include the following components:

- trip reduction targets,
- measures to discourage single-occupancy vehicles while encouraging alternative modes of transportation such as carpooling, ride sharing, vanpooling, subsidized transit passes and other benefits,
- provisions for guaranteed rides home for eligible employees,
- establishment of applicable fees and funding mechanisms,
- defined monitoring measures and frequency, and strategies for non-compliance.

Level of Significance After Mitigation

MP Area 2: Significant and unavoidable impact.

Vista Ranch Development/MP Area 1: Significant and unavoidable impact.

VMT reduction depends on factors such as actual implementation of planned land use development, demographic change, household preferences for housing types and locations, the cost of fuel, and the competitiveness of transit relative to driving, which relates to congestion along vehicular commute routes that are not under the proposed project's jurisdiction, as well as transit provided by parties other than the proposed project or the City. The feasibility and effectiveness of the mitigation measures is either insufficient or unknown at this time. The proposed project cannot demonstrate definitively that implementation of these policies would achieve VMT reductions to meet the VMT per capita or VMT per employee thresholds. With implementation of the proposed project and the recommended mitigation measures, this impact would remain significant and unavoidable.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Cumulative projects in the region may generate new VMT, which would be added to the roadway network within the geographic context. All cumulative projects would be required to comply with City and local ordinances and General Plan policies that address VMT, as well as to mitigate their fair share of impacts related to VMT. Although the proposed project incorporates a range of strategies, project design features, and MM TRANS-2, these measures are not sufficient to offset the significant increase in VMT associated with new residential and employment uses. Nonetheless, cumulative projects would have a potentially significant impact related to VMT.

VMT, by definition, is cumulative. The proposed project would contribute to an increase in VMT, and that increase would be considered significant and unavoidable. Therefore, the proposed project would result in a cumulatively considerable contribution to VMT. As such, the proposed project, in conjunction with other planned and approved projects, would result in a significant and unavoidable cumulative impact with respect to VMT.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

No feasible cumulative mitigation.

Level of Cumulative Significance After Mitigation

MP Area 2: Significant and unavoidable impact.

Vista Ranch Development/MP Area 1: Significant and unavoidable impact.

Hazards

Impact TRANS-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in any increase in hazards because of a geometric design feature or incompatible uses. As such, no impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

A search of crash records available from the Statewide Integrated Traffic Records System (SWITRS) database for the years 2019 through 2023 at each of the study intersections was performed. Table 3.16-7 presents a general summary of the crash rates calculated for each intersection.

Table 3.16-7: Crash Rates

Intersection	Crash Rate	Intersection	Crash Rate
1. Willow Avenue and International Avenue	0.186	23. Fowler Avenue and Teague Avenue	0.479
2. Willow Avenue and Behymer Avenue	0.000	24. Fowler Avenue and Nees Avenue 44. Project	0.222
3. Willow Avenue and Shepherd Avenue	0.339	25. Fowler Avenue and Alluvial Avenue	0.221
4. Minnewawa Avenue and International Avenue	0.899	26. Fowler Avenue and SR-168 WB Ramps	0.000
5. Minnewawa Avenue and Behymer Avenue	0.994	27. Fowler Avenue and SR-168 EB Ramps	0.023
6. Minnewawa Avenue and Shepherd Avenue	0.510	28. Perrin Road and Burgan Avenue	0.000
7. Clovis Avenue and International Avenue (Future)	N/A	29. Burgan Avenue and Shepherd Avenue	0.000
8. Clovis Avenue and Behymer Avenue (Future)	N/A	30. Armstrong Avenue and Shepherd Avenue	0.133
9. Clovis Avenue and Shepherd Avenue	0.219	31. Temperance Avenue and Shepherd Avenue	0.420

Intersection	Crash Rate	Intersection	Crash Rate
10. Clovis Avenue and Nees Avenue	0.269	32. Nees Avenue and Temperance Avenue	0.239
11. Clovis Avenue and Alluvial Avenue	0.247	33. Temperance Avenue and Alluvial Avenue	0.224
12. Clovis Avenue and Herndon Avenue	0.508	34. Temperance Avenue and SR-168 WB Ramps	0.000
13. SR-168 EB Ramps and Herndon Avenue	0.116	35. Temperance Avenue and SR-168 EB Ramps	0.140
14. SR-168 WB Ramps and Herndon Avenue	0.012	36. Locan Avenue and Shepherd Avenue	0.099
15. Sunnyside Avenue and Behymer Avenue (Future)	0.598	37. Locan Avenue and Nees Avenue	0.255
16. Sunnyside Avenue and Shepherd Avenue	0.294	38. Locan Avenue and Owens Mountain Parkway	N/A
17. Sunnyside Avenue and Nees Avenue	0.600	39. De Wolf Avenue and Shepherd Avenue	0.340
18. Sunnyside Avenue and Alluvial Avenue	0.069	40. De Wolf Avenue and Owens Mountain Parkway	0.070
19. Sunnyside Avenue and Herndon Avenue	0.340	41. Owens Mountain Parkway and SR-168	0.031
20. Fowler Avenue and Behymer Avenue	0.453	42. Shepherd Avenue and SR-168	0.700
21. Fowler Avenue and Perrin Road (Future)	0.269	43. Project Access South and Shepherd Avenue (Future)	N/A
22. Fowler Avenue and Shepherd Avenue	0.445	44. Project Access North and Behymer Avenue (Future)	N/A

Notes:
Crash rates are reported in crashes per million vehicles entering the intersection.
Source: Peters Engineering Group, 2025.

There are generally four types of intersections listed in Table 3.16-7: (1) signalized, (2) all-way stop, (3) one-way stop, and (4) two-way stop.

- **Signalized and All-way Stop.** In general, the additional trips generated by a proposed project are not likely to create a safety issue or substantially exacerbate the existing safety conditions at a signalized intersection or an all-way-stop-controlled intersection because the right-of-way is assigned by the control, regardless of the length of the queues at the intersection. These systems for determining which vehicles or pedestrians may proceed at any given time reduce

the potential for conflicts and driver confusion (provided that the capacity of the intersection is not exceeded).

- **One-way and Two-way Stop.** The types of intersections at which additional traffic volumes are most likely to have the potential to contribute to safety issues are one-way and two-way stop-controlled intersections. At these locations, traffic on the major street is not required to stop, and increased delays resulting from additional traffic on either street may increase the likelihood that drivers become impatient and are willing to take additional risks to avoid queueing, such as pulling out into busy traffic. Where an acceptable LOS exists at a one-way or two-way stop-controlled intersection with adequate visibility and design features, the likelihood that drivers become impatient decreases. Conversely, where a poor LOS occurs, driver impatience tends to increase.

Thus, if mitigation proposed for a one-way or two-way stop results in an acceptable LOS for that intersection or contemplates improvements such as an all-way stop or signalization, the intersection would not be expected to experience new or exacerbated adverse safety impacts.

Generally speaking, improvements to the intersection control at an intersection are feasible only if warrants for all-way stop control or traffic signals are satisfied; however, where warrants are not satisfied, the installation of all-way stop control or traffic signals would be infeasible.

Of the study intersections, only the following are one-way or two-way stop-controlled under the existing conditions:

- Minnewawa Avenue/International Avenue (potential all-way stop to be installed as described in the TIA)
- Fowler Avenue/Perrin Avenue (potential traffic signal to be installed as described in the TIA)
- Fowler Avenue/Teague Avenue (acceptable LOS with proposed project)
- Burgan Avenue/Perrin Avenue (acceptable LOS with proposed project)
- Burgan Avenue/Shepherd Avenue (acceptable LOS with proposed project)
- Armstrong Avenue/Shepherd Avenue (potential traffic signal to be installed as described in the Supplemental Traffic Analyses)
- Locan Avenue/Shepherd Avenue (potential traffic signal to be installed as described in the TIA)

Below is a more in-depth evaluation of the intersections that experience the greatest crash rates among the study intersections in terms of crashes per million vehicles:

- Minnewawa Avenue/Behymer Avenue (existing all-way stop): 0.994 crashes per million vehicles
- Minnewawa Avenue/International Avenue (existing two-way stop): 0.899 crashes per million vehicles

- Shepherd Avenue/SR-168 (existing signalized): 0.700 crashes per million vehicles
- Sunnyside Avenue/Nees Avenue (existing all-way stop): 0.600 crashes per million vehicles

The predominant type of crash at the intersection of Minnewawa and Behymer Avenues is a rear-end collision, followed by hitting an object and broadside collisions. It is likely that many drivers traveling at unsafe speeds may not anticipate queues associated with delays and congestion. Where advance warning signage already exists, consideration could be given to enhancing the visibility of the signage, potentially including adding stop beacons to the stop signs in accordance with the California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05.

The predominant type of crash at the intersection of Minnewawa and International Avenues is a broadside collision. There was one fatality in 2023. The intersection has been identified as potentially requiring installation of all-way stop control in the near-term condition based on peak-hour operations alone. The CMUTCD indicates that an intersection may be converted to all-way stop control if five crashes susceptible to correction with stop signs occur within a 12-month period. During the 5-year period of 2019 through 2023, there were up to four crashes during a 12-month period that would be considered susceptible to correction with stop signs, but there were no 12-month periods identified with five crashes. Considering the increase in traffic volumes expected as a result of development in the region, and the calculated collision rate, it appears likely that the number of collisions at the intersection could increase. Along with installation of all-way stop control, consideration should be given to enhancing the visibility of signage at the intersection, adding flashing beacons, and installing street lighting. With these improvements, the proposed project would not cause or exacerbate an unsafe traffic condition. For the interim period, during which two-way stop control remains, it is recommended that W4-4P “CROSS TRAFFIC DOES NOT STOP” plaques be installed beneath the existing stop signs.

The predominant type of crash at the intersection of Shepherd Avenue and SR-168 (which is a signalized intersection under Caltrans’ jurisdiction) is a broadside collision, followed by hitting an object. The collisions tend to be the result of right-of-way violations and improper turns. It is likely that the large size of the intersection contributes to driver willingness to turn in front of other vehicles or misjudge speeds and distances. Considering that the intersection is signalized, the proposed project would not cause or exacerbate an unsafe traffic condition.

The predominant type of crash at the intersection of Sunnyside and Nees Avenues, which is a four-way stop, is a broadside collision associated with running a stop sign or a right-of-way violation. The intersection has been identified as requiring signalization in the near-term condition, which would reduce potential safety impacts associated with the proposed project. An interim measure may include installation of stop beacons to the stop signs on Sunnyside Avenue in accordance with CMUTCD Section 4L.05. Stop beacons already exist on the stop signs on Nees Avenue.

The predominant type of crash at the signalized intersection of Shepherd and Minnewawa Avenues is a broadside collision, followed by rear-end collisions. Considering that the intersection is signalized, the proposed project would not cause or exacerbate an unsafe traffic condition.

The potential impacts related to hazards due to a geometric design feature or incompatible uses would be potentially significant. None of the intersections affected by the proposed project are expected to have safety issues exacerbated by the proposed project in the improved condition. With the implementation of the mitigation measures described below (MM TRANS-3a through MM TRANS-3f), the potential impacts would be reduced to less than significant by ensuring that there are no one-way or two-way stop-controlled intersections operating below the target LOS and by ensuring that visibility is improved at all-way stop-controlled intersections with high crash rates.

Buildout of the proposed project would result in some changes to the City's circulation network in the vicinity of the proposed project but would not increase hazards or incompatible uses due to design features. All future roadway system improvements associated with the proposed project would be designed in accordance with the established roadway design standards and as depicted in the Circulation Element of the General Plan.

These improvements would be subject to review and future consideration by the City. An evaluation of the roadway alignments, intersection geometrics, and traffic control features will be needed during development application. Roadway improvements would have to be made in accordance with the City's Circulation Plan, City of Clovis Standard Drawings and Specifications, and roadway functional design guidelines and would have to meet design guidelines, such as the accessibility requirements of Title 24 (California Building Standards Code [CBC]), Americans with Disabilities Act (ADA) and Public right-of-way Accessibility Guidelines (PROWAG) standards, CMUTCD, and the Caltrans Highway Design Manual, as applicable.

Implementation of the proposed project would not result in hazardous conditions or create conflicting uses. With the implementation of policies and ordinances listed in this report, and application of the Condition of Approval (COAs) at the time of review of land development projects, the proposed project would be designed to ensure that no hazardous circulation conditions are created as a result of the implementation of the proposed project. The proposed project would implement components of the roadway system consistent with the City's standards and guidelines. Therefore, as described in the analysis above, with implementation of MM TRANS-3a through TRANS-3f, potential impacts related to hazards due to a geometric design feature or incompatible uses would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM TRANS-3a Install all-way stop control and enhance visibility of intersection controls at the intersection of Minnewawa and International Avenues. If the agency having jurisdiction over the intersection determines that all-way stop control will not be approved based on volume warrants, the mitigation measure shall include only

enhancing visibility of intersection controls by installing stop beacons to the stop signs in accordance with the California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05 and installation of W4-4P "CROSS TRAFFIC DOES NOT STOP" plaques be installed beneath the existing stop signs.

MM TRANS-3b Enhance visibility of intersection controls at the intersection of Minnewawa and Behymer Avenues by installing stop beacons to the stop signs in accordance with California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05.

MM TRANS-3c Enhance visibility of intersection controls at the intersection of Sunnyside and Nees Avenues by installing stop beacons to the stop signs on Sunnyside Avenue in accordance with California Manual on Uniform Traffic Control Devices (CMUTCD) Section 4L.05.

MM TRANS-3d Install traffic signals at the intersection of Fowler and Perrin Avenues with the following lane configurations:

- Westbound: one shared left-turn/right-turn lane
- Northbound: one shared through/right-turn lane
- Southbound: one left-turn lane and one through lane

MM TRANS-3e Install traffic signals at the intersection of Armstrong and Shepherd Avenues with the following lane configurations:

- Eastbound: one U-turn lane and two through lanes with a shared right-turn
- Westbound: one left-turn lane and one through lane
- Northbound: one shared left-turn/right-turn lane

MM TRANS-3f Install traffic signals at the intersection of Locan and Shepherd Avenues with the following lane configurations:

- Eastbound: one left-turn lane, two through lanes, and one right-turn lane
- Westbound: one left-turn lane, two through lanes, and one right-turn lane
- Northbound: one shared left-turn/through/right-turn lane
- Southbound: one shared left-turn/through and one right-turn lane

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Impacts related to roadway safety and traffic hazards resulting from design features are generally site-specific. For example, the potential roadway safety issues or traffic hazards related to the design of an intersection are specific to that particular intersection. Cumulative projects would be required to mitigate their impacts, as well as ensure that roadway safety is maintained, and comply with applicable policies in local and regional planning documents. As such, potential cumulative impacts would be less than significant.

As discussed above, the proposed project would have a less than significant impact with mitigation incorporated, and the proposed mitigation would ensure that the proposed project's incremental contribution to potential cumulative impacts would not be cumulatively considerable, improving potential safety concerns. Therefore, the proposed project would not result in a cumulatively considerable contribution to the already less than significant cumulative impact, and cumulative impacts would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Emergency Access

Impact TRANS-4: The proposed project would not result in inadequate emergency access.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Therefore, the SOI Expansion and Non-development Area would not result in inadequate emergency access. As such, no impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Construction

The proposed project may require temporary lane closures or detours during construction activity, which could result in a potentially significant impact related to emergency access. However, MM TRANS-4 would require that all development in the Master Plan Area, including the Vista Ranch Development, prepare a traffic control plan for each phase of construction. This traffic control plan would require that all lane closures or detours be coordinated with the City and County of Fresno as applicable to ensure that access to existing businesses, existing residences, and through circulation are maintained, as well as emergency access. The traffic control plan would also require that the construction contractor provide signage, cones, and/or flag persons as deemed necessary by the

agency having jurisdiction over the roadways. Preparation of a traffic control plan, as required by MM TRANS-4, would reduce any impact of temporary lane closures or detours to less than significant because emergency access would be maintained at all times during construction.

Operation

Emergency response requires a balance of emergency response time and evacuation needs with other community concerns, such as urban design, walking and biking needs, and traffic calming. Future roadway improvements associated with the buildout of the Master Plan Area would be maintained in accordance with the General Plan's Circulation Element and functional roadway design guidelines.

With the application of the conditions of approval at the time of review of land development projects, the Master Plan Area would be designed to ensure that adequate emergency access is provided. The Master Plan would implement components of the roadway system consistent with the General Plan. Therefore, operational impacts related to inadequate emergency access would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Potentially significant impact.
Vista Ranch Development/MP Area 1: Potentially significant impact.

Mitigation Measures

MP Area 2 and Vista Ranch Development/MP Area 1

MM TRANS-4 The applicant/developer shall prepare a traffic control plan for each phase of development that shall specify traffic controls required to maintain adequate circulation and access during construction and access to all existing businesses and residences shall be maintained. The traffic control plans shall be subject to approval by the agencies having jurisdiction over the roadways, including police, sheriff, and fire departments, prior to commencement of construction.

Level of Significance After Mitigation

MP Area 2: Less than significant impact with mitigation incorporated.
Vista Ranch Development/MP Area 1: Less than significant impact with mitigation incorporated.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

Cumulative projects would be required to ensure that sufficient emergency access is provided and/or maintained in accordance with applicable federal, State, and local regulations. Accordingly, there is a less than significant cumulative impact. Site plans must be reviewed and approved by fire code officials before project approval.

As described in Impact TRANS-4, the proposed project would not result in inadequate emergency access with MM TRANS-4 incorporated. Therefore, the proposed project's contribution to related impacts would not be cumulatively considerable. As such, the proposed project, in conjunction with other planned and approved projects, would result in a less than significant cumulative impact with respect to emergency access.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

3.17 - Utilities

3.17.1 - Introduction

This section describes the existing conditions related to utilities and service systems (water, wastewater, stormwater, and solid waste) in the City of Clovis (City) and project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to such utilities and service systems that could result from the implementation of the proposed project. Information in this section is based, in part, on information provided by the City of Clovis 2020 Urban Water Management Plan (UWMP), the City of Clovis 2017 Wastewater Collection System Master Plan, and the Wastewater Hydraulic Modeling Study, Water Supply Assessment (WSA), and Water Infrastructure Investigation (Appendix L) prepared for the proposed project.

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period regarding utilities and service systems:

- Comment stating that the proposed project is outside of the Fresno Irrigation District's (FID's) boundary line and is not entitled to water from the Kings River and would have to find alternative sources of water. (p. 3.17-5)
- Comment stating that the EIR must fully analyze the potential water demands of the development, the available water supplies, and the potential adverse impact of the increased water demands. (pp. 3.17-27 to 3.17-30)
- Comment stating that the water supply proposed to be used by the proposed project must be clearly identified, and all potential issues must be fully evaluated and addressed. (pp. 3.17-5; 3.17-27 to 3.17-30)
- Comment stating that any potential adverse impacts of the proposed project to FID being able to utilize water from Big Dry Creek must be fully identified and analyzed. (pp. 3.17-5 to 3.17-6; 3.17-22)
- Comment requesting that the proposed project provide, and the Revised Draft EIR analyze, mass grading and utility extensions and connections to all Planning Areas (PAs) within the Master Plan Area. (pp. 3.17-21 to 3.17-23)
- Comment requesting that the Revised Draft EIR provide analysis to show that the region has sufficient electrical energy generation capacity to serve the proposed project without reducing capacity for planned projects in the City of Fresno. (pp. 3.17-22; 3.17-24)
- Comment requesting that the Revised Draft EIR provide sufficient analysis to show how the proposed project affects the capacity of the Fresno-Clovis Wastewater Treatment Plant, and any other wastewater-related impacts to the City of Fresno. (pp. 3.17-32 to 3.17-33)

- Comment requesting information on whether the City has acquired additional water supplies for the proposed project. (pp. 3.17-27 to 3.17-30)
- Comment requesting information on what contingency plans exist for maintaining water supply for the project area. (pp. 3.17-27 to 3.17-30)
- Comment requesting information on whether the proposed project would incorporate any recycled water systems. (p. 3.17-8)
- Comment requesting that the Revised Draft EIR address the anticipated sewer flows generated by the proposed project. (pp. 3.17-33 to 3.17-34)
- Comment requesting information on how the City intends to convey flows generated by the proposed project and future development in the adjusted focus area. (pp. 3.17-27 to 3.17-34)
- Comment(s) requesting that the Revised Draft EIR thoroughly analyze and mitigate impacts to water supply and water quality. (pp. 3.17-27 to 3.17-30)
- Comment(s) requesting information regarding from where the proposed project would receive water. (pp. 3.17-3 to 3.17-4)
- Comment(s) requesting that the Revised Draft EIR include a comprehensive WSA that clearly demonstrates sufficient and reliable water supplies exist for this development without negatively impacting existing users or environmental resources. (pp. 3.17-27 to 3.17-30)
- Comment requesting information on any infrastructure improvements needed to deliver water to the Sphere of Influence (SOI) Expansion Area and whether these improvements are funded and accounted for in the project planning. (pp. 3.17-27 to 3.17-33)
- Comment(s) stating concerns related to groundwater supply for private wells in the project vicinity. (pp. 3.17-27 to 3.17-30)

3.17.2 - Environmental Setting

Water

The City's Public Utilities Department is responsible for many public services within the City, including water service, sewer service, recycled water service, refuse, streets, parks, street lighting and signals, and fleet maintenance. The City's Public Utilities Department is the only municipal water purveyor in the City and provides service to approximately 122,350 City customers. The City's service area encompasses the city limits and the small unincorporated community of Tarpey Village. The City's estimated population in 2020 was 118,741, while Tarpey Village had an estimated population of 3,609 and is mainly comprised of residential housing. The city limits currently encompass 25.9 square miles. The City's SOI covers 34.9 square miles, while the City of Clovis General Plan (General Plan) encompasses approximately 74.3 square miles.[1]

[1] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

The City sources its potable water from a combination of groundwater, surface water, and recycled water. Surface water is drawn from the Kings River and is delivered to the City by FID. Groundwater is pumped from 37 municipal wells located throughout the City, drawing their water from the Kings Subbasin. In 2023, approximately 69 percent of the City's water came from groundwater, with the remaining 31 percent being supplied by surface water treated at the City's Surface Water Treatment Plant.[2] This facility currently has a treatment capacity of 22.5 million gallons per day, with plans to expand to 45 million gallons per day to accommodate future growth. With population projections estimating growth to 178,000 by 2040, the City continues to invest in infrastructure to ensure a reliable water supply for the future. The Tarpey Village area is considered built out; therefore, the population is assumed to remain constant, while the City's population is expected to increase by 1.9 percent annually, as shown in Table 3.17-1.[3]

Table 3.17-1: Service Population–Current and Projected

Service Area Population1	Years			
	2025	2030	2035	2040
City of Clovis[2]	131,406	144,436	158,758	174,500
Tarpey Village[3]	3,609	3,609	3,609	3,609
Total	**135,015**	**148,045**	**162,367**	**178,109**

Notes:
1 Service area population is defined as the population served by the distribution system.
2 1.91 percent growth projection, California Department of Finance. 2020. E-1 and E-4 Estimates.
3 No Growth Projection per City of Clovis.

Source: City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. July; California Department of Finance. 2020. E-1 and E-4 Estimates; United Census Bureau. 2020. American Community Survey, Five-Year Estimates.

Water Source and Supply

Groundwater

The City's groundwater supplies stem from the unadjudicated basin underlying the area, the Kings Subbasin, which lies within the Tulare Lake Hydrologic Basin. According to the California Department of Water Resources (DWR), the Kings Subbasin covers a surface area of approximately 976,000 acres (1,530 square miles). DWR estimated that, in 1961, total basin storage was about 93,000,000 acre-feet to a depth of more than 1,000 feet. The two major rivers overlying the subbasin are the San Joaquin River and the Kings River. The Fresno Slough and James Bypass are along the western edge of the southern basin and connect the Kings River to the San Joaquin River. According to DWR, the groundwater in the subbasin is predominantly of a bicarbonate type. Total dissolved solids (TDS)

[2] City of Clovis Water Division. 2024. Annual Water Quality Report. Website: https://cms2.revize.com/revize/clovis/CA019004-1_WR.pdf. Accessed December 26, 2025.
[3] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

values are generally under 600 milligrams per liter (mg/L). The subbasin does have localized water quality impairments, including dibromochloropropane (DBCP), nitrate, ethylene-dibromide, trichloropropane (TCP), methyl tert-butyl ether (MTBE), uranium, arsenic, hexavalent chromium, perfluoroalkyl substances (PFAS), and petroleum hydrocarbons. High concentrations of fluoride, boron, and sodium can be found in localized areas of the subbasin.[4]

While the basin is not adjudicated and does not have legal limitations on groundwater pumping, the City is a participant in the North Kings Groundwater Sustainability Agency (NKGSA) and a party to the North Kings Groundwater Sustainability Plan (GSP). The NKGSA is working cooperatively with the six other GSAs in the Kings Subbasin to manage the groundwater aquifer and reach sustainability by 2040. As part of those efforts, the agencies have agreed to manage groundwater extraction in a way that does not cause undesirable results in the aquifer. The City is working toward reducing its groundwater reliance and will be using a sustainable groundwater pumping quantity for future supplies planning with the balance of City water demands being met through surface or recycled water supplies.[5]

There are more than 30 groundwater wells within the City.[6] In 2020, groundwater provided approximately 49 percent of the total potable water use. The historic volume of groundwater pumped by the City from the Kings Subbasin over the past 5 years is provided in Table 3.17-2. The groundwater extraction has been reduced since 2016 and is expected to continue reducing.[7]

The City has documented a sustainable amount of groundwater that can be extracted from year to year and replenished through naturally occurring groundwater recharge. The City will continue increasing its surface water and recycled water supply usage to a point where the groundwater extraction is not greater than the sustainable yield in a normal year. The sustainable yield is currently estimated at 9,400 acre-feet per year (AFY) for the SOI, without additional intentional recharge.

Table 3.17-2: Groundwater Volume Pumped

Groundwater Type	2016	2017	2018	2019	2020
Alluvial Basin	13,187	12,001	11,991	10,956	12,105
Total	**13,187**	**12,001**	**11,991**	**10,956**	**12,105**

Notes:
Source: Provost & Pritchard Consulting Group. 2021. City of Clovis Urban Water Management Plan 2020 Update. July. Accessed May 27, 2025.

[4] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

[5] Ibid.

[6] Provost and Pritchard. 2025. Vista Ranch Master Plan: Water Supply Assessment. September.

[7] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

Master Plan Area

The Master Plan Area currently contains existing domestic and agricultural groundwater wells which serve the area. Currently, approximately 10 AFY is pumped from the existing wells. As part of the proposed project, all existing groundwater wells on the properties proposed for development would be abandoned and destroyed. The nearest City groundwater well to the Master Plan Area is approximately 1 mile south at Temperance and Nees Avenues. No new groundwater wells would be constructed within or in the vicinity of the Master Plan Area as part of the proposed project's development. The City's water system is divided into two pressure zones, with the Master Plan Area falling entirely within Pressure Zone 2, which largely relies on surface water.[8]

Surface Water

The City's surface water supply is provided through an agreement with FID, which allows the City to receive a share of FID's entitlement to the Kings River and Friant Division of the Central Valley Project (CVP), which manages water. Two additional water districts are located within the City's General Plan Boundaries: Garfield Water District (GWD) and International Water District (IWD). As the districts urbanize, supply within these areas is expected to be added to the City's supply. Each water supply agreement is summarized below.

Fresno Irrigation District

Kings River

The FID obtains much of its surface water from the Kings River. As a member of the Kings River Water Association, FID 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, FID receives a greater entitlement. The FID's average gross annual entitlement is 452,541 acre-feet. Within the last 50 years, the smallest entitlement received was 158,109 acre-feet, 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. Over time, the City has received on average 17,011 AFY, though this has varied from 9,452 acre-feet in the severe drought of 2015 to over 24,958 acre-feet in 2017.[9]

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. Of that, 800,000 acre-feet have been designated as Class I supply. 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. The FID has a contract

[8] Provost and Pritchard. 2025. Vista Ranch Master Plan: Water Supply Assessment. September.

[9] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

with the United States Bureau of Reclamation for 75,000 acre-feet of Class II water from this source. The agreement between the City and FID requires FID to make available to the City the proportional share of all surface water available to the water districts, 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 acre-feet, depending upon the nature of each water year over that period. Table 3.17-3 lists the surface water volume received in 2020 and the projected allocation from Class I and Class II.[10]

Garfield Water District

The GWD is located north of the City with a portion of the district in the City's SOI. The GWD holds a Class I 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.[11]

International Water District

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 buildout, it is estimated that the entire 1,200 AFY supply will be added to the City's supply. [12]

Table 3.17-3 shows the actual volume of surface water the City received in 2020 and the projected volume the City anticipates for 2025 through 2040. Future projections are based on the normal entitlement.

Table 3.17-3: Actual and Projected Surface Water Supply

Supply Source	2020 (acre-feet)	2025 (acre-feet)	2030 (acre-feet)	2035 (acre-feet)	2040 (acre-feet)
Kings River[1]	18,039	19,227	22,717	26,208	32,100
FID Agreement[2]	0	2,500	4,000	5,000	6,000
CVP Class II	0	433	867	1,300	1,300
GWD Class I	0	550	1,100	1,650	1,750
IWD Class I	0	0	500	1,000	1,200
Total	**18,039**	**22,710**	**29,184**	**35,158**	**42,350**

[10] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

[11] Ibid.

[12] Ibid.

Supply Source	2020 (acre-feet)	2025 (acre-feet)	2030 (acre-feet)	2035 (acre-feet)	2040 (acre-feet)

Notes:
CVP = Central Valley Project
FID = Fresno Irrigation District
GWD = Garfield Water District
IWD = International Water District

[1] Kings River supply includes surface water supplies from both the City's agreements with the Fresno Irrigation District (FID), including a cap at 7.12 percent of the FID area on the first agreement (equating to 32,100 acre-feet and anticipated to be reached in 2040 based on the City's growth rate) and an additional 7,000 acre-feet firm water supply by 2045. Both provisions are shown in the 2019 agreement.

[2] According to the 2019 FID Agreement, up to 1,000 acre-feet in 2020 and up to 7,000 acre-feet in 2045, Firm Supply.

Source: City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. July.

Master Plan Area

The Master Plan Area would be served by new connections to the City's potable and nonpotable water distribution system. The proposed water system would be located within proposed public utilities easements and/or street public right-of way and connected to existing City main lines.

The Master Plan would be served by a new potable water distribution system. Future phases of the proposed project would require new water supply infrastructure that would extend beyond the proposed project boundaries. These improvements would consist of approximately 16-inch, 12-inch, and 8-inch water mains, and it is anticipated that these extended water infrastructure improvements would be within existing rights-of-way or public utility easements along adjacent roadways and connected to existing City main lines. These future improvements would likely extend from the northern project boundary to the west along Behymer Avenue to approximately 2,640 feet west of Sunnyside Avenue, as well as along Perrin Road, extending west until the west property line.

Supply from Storage

Two banking facilities, the Waldron Banking Facility and Boswell Groundwater Banking Facility (BGBF), 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 (WBF). The City is entitled to receive up to 90 percent (9,000 acre-feet) of the annual yield. The City plans on taking the water in dry years to augment supply.[13]

The City and FID have entered into a similar agreement regarding the BGBF, 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. In the event the facility cannot

[13] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

produce the 4,500 AFY of surface water, FID will endeavor to acquire supplemental water for the City from other sources, which the City will be required to fund.[14]

Recycled Water

A large portion of the City's wastewater is treated at the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF), located southwest of the City of Fresno. It is approximately 16 miles by trunk sewer to the City. Currently, the water is treated to the secondary level and then some is spread in percolation ponds and some is used directly on non-food crops. The plant can utilize wells on the treatment plant property to pump water to reduce groundwater mounding under the plant. The pumped water can then be put into Dry Creek and the Houghton Canal for use by farmers downstream. The FID, in exchange, can provide the City of Fresno an additional 1 acre-foot of surface water for each 2 acre-feet of water pumped and put into the canals, which is designated to be used as recharge on the east side of the FID.

The City also operates the Clovis Sewer Treatment–Water Reuse Facility (ST-WRF), treating a portion of the wastewater generated within the service area to a tertiary treatment level. Once treated the recycled water is used in one of two ways: landscape irrigation throughout the City's service area or agricultural irrigation. As the recycled water system is expanded, based on the Recycled Water Master Plan, the City can expand the users of those supplies to reduce demands on the potable water supply.

Master Plan Area

According to the City's 2018 Recycled Water Master Plan, the City plans to expand its recycled water infrastructure with 6-inch and 8-inch recycled water transmission lines within the Master Plan Area. At project buildout, the proposed project may include connections to these lines for landscape irrigation.

Water Demand and Use

City of Clovis

The City's 2020 UWMP summarizes the 2025 to 2040 water demands during normal, single dry year, and multiple dry years extending to 5 years, as shown in Table 3.17-4. The projections indicate that the City would have an adequate water supply under all of the calculated average, single dry, and multiple dry year scenarios.

Table 3.17-4: Normal Year, Single Dry Year, and Multiple Dry Year Supply and Demand Comparison

Category1	2025	2030	2035	2040
Normal Year				
Supply Totals[2]	50,739	59,937	65,034	74,650
Demand Totals	39,737	42,824	46,422	52,598

[14] Ibid.

Category1	2025	2030	2035	2040
Difference	11,002	16,113	18,612	22,052
Single Dry Year				
Supply Totals	37,839	43,587	47,233	53,109
Demand Totals	34,272	37,359	40,957	47,133
Difference	3,567	6,228	6,276	5,976
Multiple Dry Years				
Year One				
Supply Totals	46,784	54,607	60,330	68,999
Demand Totals	36,489	39,422	42,840	48,707
Difference	10,294	15,185	17,490	20,292
Year Two				
Supply Totals	45,093	52,576	57,958	66,095
Demand Totals	34,183	36,962	40,200	45,758
Difference	10,910	15,614	17,758	20,337
Year Three				
Supply Totals	41,895	48,310	52,625	59,717
Demand Totals	31,346	33,969	37,028	42,277
Difference	10,550	14,341	15,597	17,440
Year Four				
Supply Totals	37,839	43,587	47,233	53,109
Demand Totals	28,005	30,474	33,353	38,293
Difference	9,834	13,112	13,881	14,815
Year Five				
Supply Totals	49,743	57,992	64,141	73,716
Demand Totals	37,825	40,758	44,176	50,043
Difference	11,918	17,235	19,965	23,674

Notes:

[1] Units = acre-feet

[2] Water supply totals include groundwater, surface water, supply from storage, recycled water, and transfers from Garfield Water District (GWD) and International Water District (IWD).

Source: City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. July.

Water Distribution

City of Clovis

As described above, the City's water distribution system draws water from three main water supply sources: groundwater, surface water, and recycled water. According to the 2020 UWMP, the City's water distribution system lost between 661 acre-feet and 1,363 acre-feet.[15]

Master Plan Area

The Master Plan Area does not currently contain any water distribution infrastructure. The proposed project would construct water distribution infrastructure on-site and off-site.

Wastewater

Wastewater Collection System

The City's wastewater collection system is divided into seven major service areas. Under existing conditions, the Herndon, Fowler, Sierra, and Peach service areas discharge into the City's regional trunks, which convey flows to the RWRF. Flow from the remaining three service areas (Northwest, Northeast, and Southeast) are conveyed to the ST-WRF.

According to the 2017 Wastewater Collection System Master Plan, the City currently generates an Average Daily Flow of 7.018 million gallons per day (mgd) (7,861 AFY).[16] In 2020, approximately 5.547 mgd (6,213 AFY) was conveyed to the RWRF, while 2.229 mgd (2,496 AFY) was treated at the ST-WRF; for a total average daily flow of 7.775 mgd (8,710 AFY). The ST-WRF alone treats a total average daily flow of approximately 2.8 mgd (3,136 AFY), but the plant is designed to accommodate future expansion and will ultimately treat 8.4 mgd (9,400 AFY).[17]

Master Plan Area

The Master Plan would be served by new connections to the City's wastewater collection system installed within proposed public utilities easements. The proposed wastewater conveyance facilities would connect to the existing sewer main lines. Wastewater treatment would be provided at the existing Regional Wastewater Treatment Plant (RWTP) in the City of Fresno and by the ST-WRF.

Long-term Treatment Capacity Plans

According to the 2017 Wastewater Collection System Master Plan, the RWTP could support a total flow capacity of 10.181 mgd from the Herndon, Fowler, Sierra, and Peach service areas, while the ST-WRF could support a total flow capacity of 8.4 mgd from the Northwest, Northeast, and Southeast service areas. The Northwest, Northeast, and Southeast service areas have a total projected flow of

[15] City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. July.

[16] City of Clovis. 2017. City of Clovis, California–Wastewater Collection System Master Plan. April 5. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/Master%20Service%20Plan/2017-Draft-Wastewater-Master-Plan.pdf. Accessed May 28, 2025.

[17] City of Clovis. 2021. Urban Water Management Plan. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520. Accessed May 15, 2025.

10.214 mgd at buildout of the General Plan. This discrepancy of 1.814 mgd is expected to be diverted to the Fowler Trunk Sewer, which connects to the RWTP.[18]

Master Plan Area

As described above, the Master Plan would be served by new connections to the City's wastewater collection system installed within proposed public streets. The proposed wastewater conveyance facilities would connect to the existing sewer main lines via a wastewater conveyance system that includes the off-site installation of 600 feet of 12-inch gravity pipes, an additional 4,700 feet of 12-inch gravity pipes, and 2,400 feet of 15-inch gravity pipes. Wastewater treatment would be provided at the existing RWTP in the City of Fresno and by the City's Water Reuse Facility. By agreement with the City of Fresno, the City of Clovis owns a maximum capacity of 9.3 mgd. The RWTP is operated by the City of Fresno, while subject to the equitable ownership interests of the City of Clovis, and has a maximum capacity of 80 mgd. If required, the City has the capability to acquire additional capacity at the RWTP. Wastewater treatment may also be provided by the ST-WRF. The ST-WRF serves the new growth areas of the City in the southeast, northwest, and the northeast urban centers.

The ST-WRF is designed to accommodate future expansion and would ultimately treat 8.4 mgd. The City would manage service to the Master Plan Area to optimize the use of available capacity at each of the plants to facilitate service to the proposed project.

Stormwater

Generation and Collection

Fresno Metropolitan Flood Control District

The Fresno Metropolitan Flood Control District (FMFCD) provides flood control and urban stormwater services for the City, and services the 399-square mile watershed located between the Kings and San Joaquin Rivers. The FMFCD provides stormwater collection services for approximately 700,000 people. The Fresno/Clovis urban area is protected by three dams and seven large detention basins and is served by a system of more than 700 miles of pipeline and more than 150 stormwater retention basins.[19]

Master Plan Area

The Master Plan would include the construction of a new storm drainage system, which would connect to the existing infrastructure in the City.

[18] City of Clovis. 2017. City of Clovis, California–Wastewater Collection System Master Plan. April 5. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/Master%20Service%20Plan/2017-Draft-Wastewater-Master-Plan.pdf. Accessed May 28, 2025.

[19] Fresno Metropolitan Flood Control District (FMFCD). 2025. About Fresno Metropolitan Flood Control District. Website: https://www.fresnofloodcontrol.org/. Accessed May 29, 2025.

Solid Waste

City of Clovis Public Utilities

The City of Clovis Public Utilities, Community Sanitation Division, provides solid waste, recycling, and organic collection services within the City. In 2024, 73.6 percent (73,694.6 tons) of the City's solid waste was disposed of at the City of Clovis Landfill.[20] The City's remaining waste was diverted to other landfills, such as the Fairmead Landfill, the American Avenue Disposal Site, the Avenal Landfill, the Merced County Regional Waste Management Authority Highway 59 Landfill, the Merced County Regional Waste Management Authority Billy Wright Landfill, the Newby Island Sanitary Landfill, the Visalia Landfill, Chemical Waste Management, Inc., the Potrero Hills Landfill, and the Woodville Landfill.[21] The City of Clovis Landfill encompasses 210 acres, with a maximum permitted daily throughput of 2,000 tons and a maximum capacity of 7,800,000 cubic yards. The landfill has an estimated closure date of April 30, 2047.[22]

Master Plan Area

Currently, solid waste generated on the Master Plan Area is collected by the City of Clovis Public Utilities, Community Sanitation Division. Solid waste services would continue to be provided by the City for the proposed project.

3.17.3 - Regulatory Framework

Federal

Safe Drinking Water Act

The Safe Drinking Water Act authorizes the United States Environmental Protection Agency (EPA) to establish national standards for drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally occurring and man-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Department of Health Services conducts most enforcement activities.

[20] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Jurisdiction Disposal and Beneficial Reuse by Destination – Clovis. Website: https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial. Accessed May 29, 2025.

[21] Ibid.

[22] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Solid Waste Information System Facility /Site Activity Details – City of Clovis Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4529?siteID=347. Accessed May 30, 2025.

Clean Water Act (National Pollutant Discharge Elimination System)

The Water Pollution Control Act of 1972, more commonly known as the Clean Water Act (CWA), regulates the discharge of pollutants into watersheds throughout the nation. Under the CWA, the EPA implements pollution control programs and sets wastewater standards.

The National Pollutant Discharge Elimination System (NPDES) permit program was established within the CWA to regulate municipal and industrial discharges to surface waters of the United States. Federal NPDES permit regulations have been established for broad categories of discharges, including point-source municipal waste discharges and nonpoint-source stormwater runoff. NPDES permits generally identify effluent and receiving water limits on allowable concentrations and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and provisions that describe required actions by the discharger, including industrial pretreatment, pollution prevention, self-monitoring, and other activities. Wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters and by the National Pretreatment Program for indirect discharges to a sewage treatment plant.

State

California Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act (Porter-Cologne Act), which was passed in California in 1969, the State Water Resources Control Board (State Water Board) has the ultimate authority over State water rights and water quality policy. The Porter-Cologne Act also establishes nine Regional Water Quality Control Boards (RWQCBs) to oversee water quality on a day-to-day basis at the local and regional level. The RWQCBs engage in a number of water quality functions in their respective regions and regulate all pollutant or nuisance discharges that may affect either surface water or groundwater.

California Urban Water Management Planning Act

The Urban Water Management Planning Act (California Water Code Sections 10610–10656) requires that all urban water suppliers with at least 3,000 customers prepare UWMPs and update them every 5 years. The act requires that UWMPs include a description of water management tools and options used by that entity that will maximize resources and minimize the need to import water from other regions. Specifically, UWMPs must:

- Provide current and projected population, climate, and other demographic factors affecting the supplier's water management planning;
- Identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier;
- Describe the reliability of the water supply and vulnerability to seasonal or climatic shortage;
- Describe plans to supplement or replace that source with alternative sources or water demand management measures;

- Describe the opportunities for exchanges or transfers of water on a short-term or long-term basis (associated with systems that use surface water);
- Quantify past and current water use;
- Provide a description of the supplier's water demand management measures, including schedule of implementation, program to measure effectiveness of measures, and anticipated water demand reductions associated with the measures; and
- Assess the water supply reliability.

California Health and Safety Code

Section 64562 of the California Health and Safety Code establishes water supply requirements for service connections to public water systems. Before additional service connections can be permitted, enough water must be available to the public water system from its water sources and distribution reservoirs to adequately, dependably, and safely meet the total requirements of all water users under maximum-demand conditions.

California Senate Bills 610 and 221

Senate Bill (SB) 610 and SB 221 (Water Code § 10910(c)(2)) amended State law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 seek to promote more collaborative planning between local water suppliers and cities and counties by requiring that detailed information regarding water availability be provided to decision-makers prior to approval of specified large development projects. SB 610 requires that detailed information be included in a WSA, which is then included in the administrative record that serves as the evidentiary basis for an approval action by a city or county. SB 221 requires that the detailed information be included in a verification of water supply. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code Section 10912(a)) subject to the California Environmental Quality Act (CEQA).

California Water Conservation Act

The California Water Conservation Act (SB X7-7) was enacted in November 2009 and requires each urban water supplier to select one of four water conservation targets contained in California Water Code Section 10608.20 with the statewide goal of achieving a 20 percent reduction in urban per capita water use by 2020. Under SB X7-7, urban retail water suppliers were required to develop water use targets and submit a water management plan to DWR by July 2011. The plan must include the baseline daily per capita water use, water use target, interim water use target, and compliance daily per capita water use.

California Model Water Efficient Landscape Ordinance

The California Model Water Efficient Landscape Ordinance (MWELO) was adopted by the California Office of Administrative Law in September 2009 and requires local agencies to implement water efficiency measures as part of their review of landscaping plans. Local agencies can either adopt the MWELO or incorporate provisions of the ordinance into their own code requirements for landscaping.

The City has adopted a local ordinance in Chapter 9.28, Landscaping Standards, of the City of Clovis Municipal Code (CMC).

California Integrated Waste Management Act

To minimize the amount of solid waste that must be disposed of by transformation and land disposal, the State Legislature passed Assembly Bill 939, the California Integrated Waste Management Act of 1989 (AB 939), effective January 1990. The legislation required each local jurisdiction in the State to set diversion requirements of 25 percent in 1995 and 50 percent in 2000; established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities; and authorized local jurisdictions to impose fees based on the types or amounts of solid waste generated. In 2007, amendments to the California Integrated Waste Management Act introduced a new per capita disposal and goal measurement system that moves the emphasis from an estimated diversion measurement number to using an actual disposal measurement number as a per capita disposal rate factor. As such, the new disposal-based indicator (pounds per person per year) uses only two factors: a jurisdiction's population (or in some cases employment) and its disposal as reported by disposal facilities.

California Senate Bill 1383

SB 1383 established targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. SB 1383 granted CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets. It also established a target of recovering not less than 20 percent of currently disposed edible food for human consumption by 2025.

California Green Building Standards Code

The California Green Building Standards Code, commonly known as CALGreen, is Part 11 of Title 24 of the California Code of Regulations (CCR) and represents the nation's first mandatory statewide green building code. Originally developed to support the State's climate goals under AB 32, CALGreen establishes comprehensive standards aimed at reducing greenhouse gas (GHG) emissions and promoting sustainable construction practices. It applies to residential, nonresidential, and public school buildings, mandating measures for energy efficiency, water conservation, material resource efficiency, and indoor environmental quality. CALGreen also includes voluntary appendices for hospitals and other facilities, and allows local jurisdictions to adopt more stringent standards based on specific regional conditions. Updates to CALGreen occur on a triennial cycle, with the 2025 edition introducing new requirements such as embodied carbon reduction and expanded electric vehicle infrastructure provisions.

Regional

Fresno-Clovis Storm Water Quality Management Program

The Fresno-Clovis Storm Water Quality Management Program (SWQMP) is a comprehensive initiative designed to protect water resources in the Fresno-Clovis Metropolitan Area from pollution caused by urban runoff. The program is implemented jointly by the cities of Fresno and Clovis and is regulated under the NPDES permit issued by the Central Valley RWQCB. The SWQMP includes

specific pollution prevention and control practices for Fresno-Clovis urban drainage system planning, design, construction, and maintenance. It also includes public education to prevent stormwater pollution and specifies construction, industrial/commercial, municipal, and new development stormwater quality control practices; procedures to prevent and respond to illicit discharges and connections; monitoring to assess municipal stormwater impacts on receiving waters; and program effectiveness assessments to evaluate the effectiveness of best management practices (BMPs).

To address the core program objectives and targeted stormwater pollutants and to ensure compliance with Municipal Separate Storm Sewer System (MS4) Permit requirements, the SWQMP incorporates a series of control measures, performance standards, and implementation schedules that provide for a long-term, comprehensive, and multidisciplinary effort by the Permittees to continue to achieve water quality standards and protect beneficial uses of the San Joaquin River, creeks and canals. The SWQMP "control measures" refer to activities intended to minimize, reduce, eliminate, or prohibit the discharge of pollutants with the goal of improving water quality. The benefits of these control measures are assessed through evaluation of associated performance standards. The performance standards include schedules and milestones for implementation.

Local

City of Clovis General Plan

The General Plan includes several policies relevant to utilities and service systems. General Plan policies applicable to the proposed project are identified below.

Land Use Element

Policy 3.5 Fiscal sustainability. The City shall require establishment of community facility districts, lighting and landscaping maintenance districts, special districts, and other special funding or financing tools in conjunction with or as a condition of development, building or permit approval, or annexation or Sphere of Influence amendments when necessary to ensure that new development is fiscally neutral or beneficial.

Policy 4.2 Surface water entitlements. The City should not approve annexation unless any and all surface water entitlements are retained; any and all surface water entitlements shall be transferred to the City upon development.

Public Facilities and Services Element

Policy 1.1 New development. New development shall pay its fair share of public facility and infrastructure improvements.

Policy 1.2 Water supply. Require that new development demonstrate contractual and actual sustainable water supplies adequate for the new development's demands.

Policy 1.3 Annexation. Prior to annexation, the City must find that adequate water supply and service and wastewater treatment and disposal capacity can be provided for the

proposed annexation. Existing water supplies must remain with the land and be transferred to the City upon annexation approval.

Policy 1.4 Development-funded facilities. The City may require developments to install on-site or off-site facilities that are in excess of a development's fair share. However, the City shall establish a funding mechanism for future development to reimburse the original development for the amount in excess of the fair share costs.

Policy 1.5 Recycled water. Use recycled water to reduce the demands for new water supplies. Support the expansion of recycled water infrastructure throughout Clovis and require new development to install recycled water infrastructure where feasible.

Policy 1.6 Master plans. Periodically update water, recycled water, wastewater, and stormwater master plans and require all new development to be consistent with the current master plans.

Policy 1.7 Groundwater. Stabilize groundwater levels by requiring that new development water demands not exceed the sustainable groundwater supply.

Policy 1.8 Water facility protection. Protect existing and future water, wastewater, and recycled water facilities from encroachment by incompatible land uses that may be allowed through discretionary land use permits or changes in land use or zoning designations.

Community Facilities Element

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 multi-family 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.

Environmental Safety Element

Policy 1.1 Flood zone. Prohibit development within the 100-year flood zone and dam inundation areas unless adequate mitigation is provided against flood hazards. Participate in the National Flood Insurance Program.

Open Space and Conservation Element

Policy 3.1 Stormwater management. Encourage the use of low impact development techniques that retain or mimic natural features for stormwater management.

Policy 3.2 Stormwater pollution. Minimize the use of nonpoint source pollutants and stormwater runoff.

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.

City of Clovis Municipal Code

The CMC contains the following applicable ordinances related to utilities and service systems:

Chapter 3.10, Development Impact Fees, establishes a uniform set of procedures applicable to AB 1600 development impact fees.

Chapter 6.3, Garbage and Rubbish, allows the City to monitor and regulate all garbage, rubbish, green waste, and recyclables, the containers the materials are collected in, and the collection process itself. The chapter establishes collection and collection points (Chapter 6.3.06) and collection rates (Chapter 6.3.08). Chapter 6.3.1, Recycling and Diversion of Construction and Demolition Debris, requires that at least 50 percent of construction waste tonnage from a covered project be diverted from disposal. Chapter 6.3.2, Mandatory Organic Waste and Disposal Reduction Regulations, includes regulations related to recyclable materials and organic waste to achieve compliance with State waste diversion standards.

CMC Chapter 6.4, Sewage Disposal, pertains to the sewer system. This chapter establishes the sewer connections and permit conditions required to safely create a functioning sewer system both in tandem with the City system and outside the City. Chapter 6.4 also establishes sewer service charges and fees to be used toward the cost of the construction or for the reimbursement of the cost of the construction, sewer lift stations, sewer pump facilities, and associated force mains within the service area for which the fee was collected.

Chapter 6.5, Water System, pertains to the provision of water by the City. Article 1 of Chapter 6.5 deals with service rates and regulations; Article 2 discusses main extensions, connections, and frontage chargers; Article 3 regulates meters, main connections, and laterals; Article 4 establishes rules for heat transfer systems utilizing water; and Article 5 establishes water efficient landscape requirements.

Chapter 6.6, Wells, regulates drilling, prohibited acts, permits required, use requirements, recharge charges, and the use of drainage wells.

Chapter 6.7, Urban Storm Water Quality Management and Discharge Control Ordinance. The purpose of the ordinance is to protect and enhance the water quality of watercourses and water bodies by reducing pollutants in urban stormwater discharges to the maximum extent practicable and by effectively prohibiting non-stormwater discharges to the storm drain system. The ordinance prohibits any discharge that could result in or contribute to a violation of the Municipal Regional Stormwater NPDES Permit (MRP). It requires BMPs to control the volume, rate, and potential pollutant load of stormwater runoff from new development and redevelopment projects.

Chapter 7.3, Underground Utility Districts, regulates underground utility districts for the purposes of public necessity, health, safety, and welfare.

Chapter 7.5, Underground Wiring, states that all utility facilities (including, but not limited to, electrical, communication and cable television lines) located within the boundaries of a development project property or to be installed in and for the purpose of supplying service to any development project shall be placed underground; and that the developer shall be responsible for compliance with the provisions of this section. It shall be the responsibility of the developer to make the necessary arrangements with the serving utility owner for the installation of an underground system, owned and operated by the utility owner. The developer shall submit satisfactory evidence thereof prior to the acceptance and approval of the development project.

Chapter 8.2, Electrical Code, adopts the California Electrical Code and subsequent amendments.

Chapter 8.6, Plumbing Code, adopts the California Plumbing Code and includes specific amendments.

Chapter 8.7, Planned Local Drainage Facilities and Improvements Development Requirements, Financing Mechanisms and Fees, requires payment of local drainage fees to fund construction of local drainage facilities and improvements.

Chapter 8.12, Floodplain Management, provides for floodplain management and regulates development in floodplains. A development permit must be obtained before construction or development within any area of special flood hazard. Permits require provisions for flood hazard reduction, including anchoring, flood-resistant materials, and construction methods to floodproof the structure.

Chapter 9.110, Subdivision Design and Improvement Requirements, requires a grading plan to be submitted to and approved by the City Engineer prior to issuance of a subdivision-level building permit. Subdivisions are required to incorporate appropriate erosion and sediment control measures.

Chapter 9.28, Landscaping Standards, requires a landscape design plan, irrigation design plan, and soil analysis in order to reduce runoff and control soil erosion as part of the landscape documentation package.

Chapter 9.42, Wireless Telecommunications Facilities, provides regulations regarding the location and design of wireless communications facilities, and intends to ensure that the installation of wireless communication facilities will not be detrimental to the City's public health, safety, or welfare. The intention of the regulations is to treat wireless communications facilities, including antennas, in the same way that other mechanical equipment (e.g., air conditioners) are treated and to require proper screening and architectural compatibility.

City of Clovis 2020 Urban Water Management Plan

The City of Clovis 2020 UWMP is a strategic document designed to ensure a reliable and sustainable water supply for the City through the year 2040. Its primary purpose is to assess current and projected water demands, evaluate available water sources, and plan for future growth while complying with California's Urban Water Management Planning Act and the Water Conservation Act of 2009. The plan outlines how the City will meet the needs of its growing population through a diversified water portfolio that includes surface water, groundwater, and recycled water. It also incorporates a Water Shortage Contingency Plan (WSCP) to guide the City's response to droughts or supply disruptions, ensuring resilience and long-term water security

City of Clovis 2017 Wastewater Collection System Master Plan

The City of Clovis 2017 Wastewater Collection System Master Plan was developed to guide the planning, design, and management of the City's wastewater infrastructure in support of current and future growth. Its primary goals include evaluating the capacity and condition of the existing collection system, projecting future wastewater flows based on land use and population growth, and identifying necessary improvements to ensure reliable service. The plan outlines strategies for optimizing the performance of the sewer network, including hydraulic modeling, flow metering, and coordination with the regional trunk sewer system that conveys flows to the Fresno-Clovis RWRF. Covering a planning area of over 27,120 acres, the plan also addresses regional integration, system expansion, and long-term sustainability of wastewater services.

3.17.4 - Methodology

The following analysis discusses the potential significant impacts of the project related to changes in utilities and service systems (water, wastewater, stormwater, and solid waste) in the project area. This section includes an analysis of potential short-term (construction) and long-term (operation and maintenance) impacts of the proposed project. Impacts are assessed based on changes to the existing conditions described earlier in this section. Mitigation measures are recommended, as necessary, to reduce impacts to a less than significant level.

3.17.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether impacts to utilities and service systems resulting from the implementation of the proposed project would be considered significant. Impacts would be significant if the proposed project would:

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 statutes and regulations related to solid waste.

3.17.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Water or Wastewater Treatment Facilities

Impact UTIL-1:	**The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. Thus, no relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities would be required as a result of the approval of the SOI Expansion. Therefore, no impacts would occur.

MP Area 2

The City plans to annex the entirety of the Master Plan Area, bringing it within incorporated city limits. Development of the proposed Master Plan would convert the approximately 507-acre Master Plan Area from its existing use to the uses described in Chapter 2, Project Description, of this Revised Draft EIR. Development of the Master Plan would result in the removal of all existing uses and structures, followed by the future construction of residential, mixed-use, and private community development, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, street lighting, signage, and other public and private uses. There is minimal existing utilities infrastructure in the SOI Expansion Area.

The Master Plan would include all new utility connections to the City's existing water and wastewater infrastructure, maintained by the City of Clovis Public Utilities Department, and existing stormwater infrastructure, maintained by the FMFCD.

Future phases of the Master Plan (MP Area 2) would require new water supply, wastewater, and stormwater infrastructure that would extend beyond the proposed project boundaries. The precise nature and size of these improvements have not yet been determined; however, it is anticipated that these extended infrastructure improvements would be within existing rights-of-way or public utility easements along adjacent roadways and connected to existing main lines.

The Master Plan would also include connections to existing telecommunications infrastructure maintained by AT&T and Comcast and existing electricity service infrastructure maintained by the Pacific Gas and Electric Company (PG&E). All new utility infrastructure would be located within designated public utilities easements, with water, wastewater, and storm drainage being located within dedicated streets, and electric, cable, and internet being located along street frontages. Furthermore, future development within MP Area 2 would be required to complete environmental evaluation pursuant to CEQA on a project-by-project basis. As future development is proposed and evaluated, potential infrastructure needs related to new or expanded water, wastewater, stormwater, electric power, natural gas, or telecommunications facilities would be evaluated and mitigated for as necessary. As such, impacts related to utility infrastructure and facilities would be less than significant.

Vista Ranch Development/MP Area 1

The Vista Ranch Development would include the construction of all new utility infrastructure connections, as described below, within public utilities easements and roadways.

Water Supply

The proposed development would include new water supply infrastructure within dedicated streets. Construction of this infrastructure would be temporary and, as such, is not anticipated to result in any significant impacts. The proposed infrastructure would connect to the City's existing water supply infrastructure operated by the City's Public Utilities Department, who would provide water supply services to the Master Plan Area.

The City has three main water supply sources: groundwater, surface water, and recycled water. The City extracts groundwater from the Kings Subbasin. Surface water is delivered to the City by the FID. The various current and planned for surface water supplies are from the Kings River and CVP. The City's Water Reuse Facility produces tertiary-treated effluent that can be used for agriculture or landscape irrigation. In addition, according to the City's 2018 Recycled Water Master Plan, the City plans to expand its recycled water transmission lines to the Master Plan Area including new 6-inch and 8-inch transmission mains.[23] The proposed project may provide connections to these mains at buildout for landscape irrigation.[24] Additionally, according to the Water Infrastructure Investigation prepared for the proposed project by Provost and Pritchard, the existing and planned water distribution system and recommended connections would be adequate to convey water supply to support anticipated demands from the proposed project.[25]

According to the WSA, the proposed project's estimated demand is approximately 1,442.7 AFY of potable water. The 2020 UWMP contains water supply and demand calculations for the City. Under a conservative scenario of 5 consecutive dry years, the 2020 UWMP states that the estimated water supply total would be 49,742 AFY and the total water demand would be 37,825 AFY, with a difference of approximately 11,918 AFY of potable water. Thus, in a multi-dry year scenario with development of the proposed project, the City would have an excess supply of approximately 10,475 AFY. As such, there would be no need to construct new or expand existing water supply facilities beyond that already proposed as part of the proposed project. As such, impacts related to water supply facilities would be less than significant.

Wastewater Treatment

The proposed development would include new wastewater conveyance infrastructure within dedicated streets. Construction of this infrastructure would be temporary and, as such, is not anticipated to result in any significant impacts. The proposed wastewater facilities would connect to the City's existing wastewater treatment system via existing sewer main lines adjacent to the Master Plan Area. Wastewater treatment would be provided at the existing RWTP in the City of Fresno and by the ST-WRF. By agreement with the City of Fresno, the City of Clovis owns a maximum capacity of 9.3 mgd. However, the RWTP is operated by the City of Fresno, while subject to the equitable ownership interests of the City of Clovis. If required, the City has the capability to acquire additional capacity at the RWTP. Wastewater treatment may also be provided by the ST-WRF. The ST-WRF serves the new growth areas of the City in the southeast, northwest, and the northeast urban centers. The City would manage service to the Master Plan Area to optimize the use of available capacity at each of the plants to facilitate service to the proposed project. According to the 2020 UWMP, the City, combined with the RWTP, has a treatment capacity of approximately 17.7 mgd. In 2020, approximately 7.8 mgd of wastewater was treated by the City. According to the Wastewater Hydraulic

[23] Provost and Prichard. 2017. City of Clovis Recycled Water Master Plan. Figure 6.4-2. February. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/Master%20Service%20Plan/2017-Draft-Recycled-Water-Master-Plan.pdf. Accessed May 30, 2025.

[24] Provost and Pritchard. 2025. Vista Ranch Master Plan: Water Supply Assessment. September.

[25] Provost and Prichard. 2025. Water Infrastructure Investigation for Vista Ranch Master Plan and Non-Development Areas. September 26.

Modeling Study prepared for the proposed project by Akel Engineering, the proposed project would produce an average dry weather flow of approximately 0.92 mgd. As such, with development of MP Area 1, the City would still have a treatment capacity of approximately 16.78 mgd. There would be no need to construct new or expand existing wastewater treatment facilities beyond that already proposed as part of the proposed project. As such, impacts related to wastewater treatment facilities would be less than significant.

Stormwater Drainage

The proposed development would include new stormwater collection infrastructure within dedicated streets. Construction of this infrastructure would be temporary and, as such, is not anticipated to result in any significant construction-related impacts.

The proposed stormwater facilities would connect to existing stormwater collection and treatment infrastructure maintained by the FMFCD, who would provide stormwater collection and treatment services to the proposed development. Additionally, the proposed project would include BMPs which would reduce the flow of stormwater off-site and encourage retention and infiltration, thereby reducing the strain on the City's off-site stormwater facilities. The FMFCD has reviewed the proposed project and determined that the existing drainage facilities in Drainage Areas BY1 and BX do not have sufficient capacity to serve the increased flows from the proposed Mixed Use Village land use. As a condition of approval, the proposed project must either upgrade the existing FMFCD pipeline system or provide on-site permanent peak flow reduction facilities (such as detention basins) to ensure that post-development flows do not exceed the adopted Rural Master Plan flow rates. All grading and improvement plans would be reviewed and approved by FMFCD to verify compliance with these requirements. This process ensures that the FMFCD system would have adequate capacity to accommodate project-generated stormwater, and that no adverse impacts would occur to downstream facilities. There would be no need to construct new or expand existing stormwater facilities beyond that already proposed as part of the proposed project. As such, impacts related to wastewater treatment facilities would be less than significant.

Power and Telecommunications

The proposed development would include new power and telecommunications facilities along street frontages. Construction of these facilities would be temporary and, as such, is not anticipated to result in any significant construction-related impacts. The proposed power and telecommunication facilities would connect to existing facilities in the City. The proposed development would receive electric power from PG&E, and internet and phone service from Comcast and AT&T. There would be no need to construct new or expand existing power and telecommunications facilities beyond that already proposed as part of the proposed project, as such impacts related to power and telecommunications facilities would be less than significant. Please also refer to Section 3.6, Energy, of this Revised Draft EIR.

Overall, impacts related to the need for relocation or construction of new or expanded water supply, wastewater treatment, stormwater drainage, or telecommunications facilities would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic context for evaluation of cumulative impacts related to utilities varies for the different utility providers servicing the City. Past and present development in the geographic context has resulted in an increase in demand for water, wastewater treatment and stormwater capacity, landfill capacity, and energy facilities to adequately serve the development. The respective service providers have responded to these increasing demands by constructing new infrastructure. In addition, each utility type has a management plan in place that addresses future projected demands for planned development. These management plans are routinely updated to account for this development. Construction of individual infrastructure projects has likely resulted in discrete impacts in various issue areas, such as aesthetics, air quality, biological resources, etc. Therefore, there could be a cumulatively significant impact from construction of past and present infrastructure projects. Future development could contribute to this cumulative impact.

The purpose of the Master Plan is to identify and develop utilities and service systems within the project area and to generally eliminate cumulative impacts outside of it. All new utility infrastructure would be located within designated public utilities easements, with water, wastewater, and storm drainage being located within dedicated streets and electric, cable, and internet being located along street frontages. There would be no need to construct new or expand existing water, wastewater, stormwater, electric power, natural gas, or telecommunications facilities beyond those already proposed as part of the development of MP Area 2. Further, development of infrastructure would be localized and would occur at different times as MP Area 2 is built out. The proposed project would comply with all State and local regulations related to utilities. Therefore, the proposed project would generally not combine with other projects to result in a cumulatively considerable contribution to cumulative impacts.

Vista Ranch Development/MP Area 1

The geographic context for evaluation of cumulative impacts related to utilities varies for the different utility providers, as described below.

Water Supply

The geographic scope of the cumulative potable water analysis is the City of Clovis. The proposed project's estimated demand is approximately 1,442.7 AFY of potable water. The 2020 UWMP estimated that potable water supplies would total 50,739 AFY in 2025 during a normal year. Conservatively assuming 5 consecutive dry years, the 2020 UWMP states that the estimated water supply total would be 49,742 AFY and the total water demand would be 37,825 AFY. Under these conditions, the remaining water supply would amount to approximately 11,918 AFY of potable water. As such, in a multi-dry year scenario with development of the proposed project, the City would have approximately 10,475 AFY of potable water for other cumulative development. The WSA shows that the total projected water supplies determined to be available for the proposed project during normal, single dry, and multiple dry years during a 20-year projection would meet the projected water demand associated with the proposed project, in addition to existing and planned future uses. Additionally, according to the Water Infrastructure Investigation prepared for the proposed project by Provost and Pritchard, the existing and planned water distribution system and recommended connections would be adequate to convey water supply to the proposed project to support anticipated demands from the proposed project.[26] As such, there would be no need to construct new or expand existing water facilities beyond those already proposed as part of the proposed project. Therefore, the Vista Ranch Development, in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to construction of water facilities.

Wastewater Treatment

The geographic scope of the cumulative wastewater analysis is the City of Clovis, which provides wastewater collection and treatment services. The proposed development would include new wastewater conveyance infrastructure within dedicated streets. The Wastewater Hydraulic Modeling Study notes that the City's existing wastewater treatment system would have adequate capacity to serve the proposed project with installation of a wastewater conveyance system as further discussed under Impact UTIL-3, below. As such, there would be no need to construct new or expand existing wastewater facilities beyond those already proposed as part of the proposed project. Therefore, the Vista Ranch Development, in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to construction of wastewater facilities.

Stormwater Drainage

The FMFCD oversees municipal storm drainage within the Fresno-Clovis Metropolitan Area. The storm drainage system consists of dams, pipelines, and retention basins. The FMFCD provides engineering standards that guide development of the storm drainage system within the district. The proposed project would include new connections to the City's existing storm drainage infrastructure owned and operated by the FMFCD. Construction of the Vista Ranch Development stormwater facilities would also be required to comply with the NPDES permit program and would include the

[26] Provost and Pritchard. 2025. Water Infrastructure Investigation for Vista Ranch Master Plan and Non-Development Areas. September 26.

development of a Storm Water Pollution Prevention Plan (SWPPP), which would further reduce impacts related to storm drainage.

Additionally, the proposed project would include Best Management Practices (BMPs) which would reduce the flow of stormwater off-site and encourage retention and infiltration, thereby reducing the strain on the City's off-site stormwater facilities. The FMFCD has reviewed the proposed project and determined that the existing drainage facilities in Drainage Areas BY1 and BX do not have sufficient capacity to serve the increased flows from the proposed Mixed Use Village land use. As a condition of approval, the proposed project must either upgrade the existing FMFCD pipeline system or provide on-site permanent peak flow reduction facilities (such as detention basins) to ensure that post-development flows do not exceed the adopted Rural Master Plan flow rates. All grading and improvement plans would be reviewed and approved by FMFCD to verify compliance with these requirements. This process ensures that the FMFCD system would have adequate capacity to accommodate project-generated stormwater, and that no adverse impacts would occur to downstream facilities. As such, there would be no need to construct new or expand existing wastewater facilities beyond those already proposed as part of the proposed project. Most past and all present and reasonably foreseeable future development must comply with applicable State and local requirements that ensure no significant adverse impacts would result. Therefore, the Vista Ranch Development, in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to storm drainage facilities.

Power and Telecommunications

The geographic context for an analysis of cumulative impacts to electricity and natural gas is the PG&E service area. The context for telecommunications is the City of Clovis. Past and present development has resulted in increased demand for electricity, natural gas, and telecommunications services. Electricity, natural gas, and telecommunications utilities respond to increased demands in various ways. These may include temporary stoppages or rolling blackouts, extension of existing infrastructure, or construction of new facilities. Each of these utility providers prepares long-range plans to accommodate projected growth in their service areas. For example, PG&E provides annual sustainability reports that outline strategies to accommodate future growth and ensure reliability of electrical and natural gas service. As indicated in the 2021 Corporate Sustainability Report, PG&E has requested approval for 387 megawatts of additional energy storage from six projects slated for completion by August 2023. These projects will provide "system reliability procurement that will help integrate increasing amounts of renewable energy and meet peak summer demand." Telecommunications companies continually expand infrastructure to serve the growing population. These planning efforts take into account growth projections, including the growth under the proposed project. Past, present, and future development has been and will continue to be accounted for in the utility plans, which are updated regularly to ensure continuity of service. The proposed development would include new power and telecommunications facilities along street frontages, which would be reviewed by these utility providers for consistency with scaling efforts. Therefore, the Vista Ranch Development, in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to power and telecommunications facilities.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than cumulatively considerable contribution.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Water Supplies

Impact UTIL-2: **The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of expanding the City's SOI to add approximately 952 acres, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area would not receive any entitlements other than to be included in the SOI Expansion, and as such, the proposed project would not include any new development or improvements within this area. As such, no water supplies would be required for the Non-development Area as a result of the approval of the SOI Expansion. Therefore, no impacts would occur.

Master Plan and MP Area 2

Portions of the Master Plan Area and MP Area 2 were not accounted for in the UWMP. As such, to evaluate the overall impact to the City's water supply portfolio, the WSA analyzed the additional water demand associated with areas of the Master Plan and MP Area 2 not previously accounted for in the UWMP, plus the increase in density as compared to assumptions in the UWMP. According to the WSA prepared for the proposed project, the Master Plan and MP Area 2 would have a total water demand of approximately 1,442.7 AFY, which includes 480.3 AFY of water demand that was not accounted for within the UWMP. A summary of the proposed project's projected water demands compared to the water demand projections for the area accounted for in the UWMP is available in Table 3.17-5.

Table 3.17-5: Water Demand Projections

	Water Demand within the UWMP Area (AFY)	Water Demand outside the UWMP (AFY)
Planned	962.4	0.0
Proposed	947.1	495.6
Difference	-15.3	495.6

	Water Demand within the UWMP Area (AFY)	Water Demand outside the UWMP (AFY)
Total Impact to Water Supply	480.3	

Notes:
UWMP = Urban Water Management Plan
AFY = acre-feet per year
Source: Provost & Pritchard. 2025. Water Supply Assessment Vista Ranch Master Plan. September.

Water demands for the proposed project would be served using the City's existing and future portfolio of water supplies. The WSA concludes that the City has adequate supplies to meet the needs of all the City's water customers, including the proposed project, in normal water years over the 20-year planning horizon. In the buildout year, if demand is as projected, the City would have sufficient water to meet dry year demands of all dry year types. Conservation measures, detailed in the WSCP, have been developed that would mitigate possible shortfalls by reducing demand by 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 its water portfolio. Furthermore, the City is implementing plans to continue to acquire water supplies and construct infrastructure to supply current and future water users. Therefore, the WSA concludes the City would have adequate water supplies to meet the needs of the City in normal and multiple dry years.

Since the 2020 UWMP was adopted, four WSAs have been prepared for the City, including the WSA prepared for the proposed project. 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 3.17-6 includes those demands noted in the UWMP, as well as the additional demands above the UWMP associated with the proposed project. 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. Two conclusions can be made:

- Near-term: There is an excess of supply in all conditions, even with the additional demands imposed by the proposed project.
- Long-term: The UWMP evaluated the City's buildout of the General Plan based on assumed land use densities. The proposed project increases the density of those areas with calculated demands documented in the UWMP and develops into an area without water demands associated with it in the UWMP. The impact of those increases equates to an additional water supply needed for the proposed project of approximately 480 AFY.

Table 3.17-6: Summary of Proposed Project Water Supplies and Demands

2020 UWMP Supply and Demand Comparison Results	Normal Year (2035)	Single Dry Year	Multiple Dry Year				
			Year 1	Year 2	Year 3	Year 4	Year 5[1]
Excess/<Deficit> in Supply	18,612	811	13,908	11,536	6,203	811	17,719
Excess/<Deficit> in Supply with Conservation	—	6,276	17,490	17,758	15,597	13,880	19,965
Additional Demands Associated with WSAs Prepared Since 2020 UWMP							
Home Place Master Plan (Approved March 2021)	No Additional Demand Associated with WSA.						
Tract 6205 SOI Expansion (Approved 2022)	256	256	256	256	256	256	256
Tract 6343 (Approved 2022)	79	79	79	79	79	79	79
Vista Ranch Master Plan (Anticipating Approval)	101	101	101	101	101	101	101
Excess/<Deficit> in Supply Including Additional Demands from Approved WSAs	18,176	375	13,472	11,100	5,767	375	17,283
Excess/<Deficit> in Supply with Conservation Including Additional Demands from Approved WSAs[2]	—	5,905	17,119	17,387	15,226	13,509	19,594

Notes:

[1] The City has a Water Shortage Contingency Plan in place that could be partially or fully implemented if needed or mandated. The "Demands with Conservation" noted below vary with the availability of water supply and the stage of the Water Shortage Contingency Plan being implemented to reduce demands. As Year 5 has nearly normal water supply availability, the conservation requirements are set at lower levels according to the Water Shortage Contingency Plan and the demands increase accordingly. Year 5 reflects the Water Shortage Contingency Plan assumption of a return to near-normal hydrologic conditions following multiple dry years. Under these conditions, mandatory conservation requirements are reduced, allowing demand to rebound toward baseline levels. The increase in Year 5 demand, therefore, represents recovery from drought-stage restrictions rather than growth in underlying water use.

[2] Per the UWMP, conservation efforts will reduce the demands by an estimated 15 percent, which is reflected in the values in the table.

Source: Provost & Pritchard. Water Supply Assessment Vista Ranch Master Plan. September 2025.

The technical analyses shows that the total projected water supplies determined to be available for the proposed project during normal, single dry, and multiple dry years during a 20-year projection will

meet the projected water demand associated with the proposed project, in addition to existing and planned future uses. The Master Plan and, thus, MP Area 2 would not result in insufficient water supplies available to serve the proposed project from existing entitlements and resources. Therefore, the Master Plan would result in a less than significant impact to water supplies.

Vista Ranch Development/MP Area 1

The WSA prepared for the proposed project included water supply and demand models that account for construction of the Vista Ranch Development. As noted in the MP Area 2 discussion above and in the MP Area 1 discussion in Impact UTIL-1, the City has adequate supplies to meet the needs of all the City's water customers, including the proposed project, in normal water years over the 20-year planning horizon. As provided above, in the buildout year, if demand is as projected, the City will have sufficient water to meet dry year demands of all dry year types.

The WSA shows that the total projected water supplies determined to be available for the proposed project during normal, single dry, and multiple dry years during a 20-year projection would meet the projected water demand associated with the proposed project, in addition to existing and planned future uses. The Vista Ranch Development would not result in insufficient water supplies available to serve the proposed project from existing entitlements and resources. Therefore, the Vista Ranch Development would result in a less than significant impact to water supplies.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope of the cumulative potable water analysis is the City of Clovis. The proposed project's estimated demand is approximately 1,442.7 AFY of potable water. The 2020 UWMP estimated that potable water supplies would total 50,739 AFY in 2025 during a normal year. Conservatively assuming 5 consecutive dry years, the 2020 UWMP states that the estimated water supply total would be 49,742 AFY and the total water demand would be 37,825 AFY. Under these conditions, the remaining water supply would amount to approximately 11,918 AFY of potable water. As such, in a multi-dry year scenario with development of the proposed project, the City would have approximately 10,475 AFY of potable water for other cumulative development. Furthermore, the 2020

UWMP estimates that sufficient water is available to meet the needs of its service area through the year 2040, which accounts for long-term growth assumptions.

Since the 2020 UWMP was adopted, four WSAs have been prepared for the City, including the WSA prepared for the proposed project. 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 3.17-6, above, includes those demands noted in the UWMP, as well as the additional demands above the UWMP associated with the proposed project. Only the "additional demand" is noted in the table, as the rest of the demand was already accounted for in the UWMP. 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. The technical analyses shows that the total projected water supplies determined to be available for the proposed project during normal, single dry, and multiple dry years during a 20-year projection will meet the projected water demand associated with the proposed project in addition to existing and planned future uses. Furthermore, the proposed project would not require any additional off-site water facilities to be constructed and expanded and, thus, would not result in physical impacts on the environment from such activities. Moreover, future developments within MP Area 2 would be required to demonstrate that they would be served with potable water service as a standard requirement of the development review process, and these projects may be required to implement water conservation measures. Therefore, the MP Area 2, in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to potable water supply.

Vista Ranch Development/MP Area 1

The cumulative setting for the Vista Ranch Development is the same as MP Area 2, described above. The WSA prepared for the proposed project included water supply and demand models that account for construction of the Vista Ranch Development. As noted in the MP Area 2 discussion above, the City has adequate supplies to meet the needs of all the City's water customers, including the proposed project, in normal water years over the 20-year planning horizon. As provided above, in the buildout year, if demand is as projected, the City will have sufficient water to meet dry year demands of all dry year types.

The WSA shows that the total projected water supplies determined to be available for the proposed project during normal, single dry, and multiple dry years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses. The Vista Ranch Development would not result in insufficient water supplies available to serve the proposed project from existing entitlements and resources. Therefore, the Vista Ranch Development in conjunction with other past, present, and reasonably foreseeable projects, would not have a cumulatively significant impact related to potable water supply.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Wastewater Treatment Capacity

Impact UTIL-3: **The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. As such no wastewater demand would be generated a result of the SOI Expansion, and no impacts would occur.

Master Plan and MP Area 2

The City plans to annex the entirety of the Master Plan Area, bringing it within incorporated city limits. The Master Plan would include all new utility connections to the City's existing wastewater treatment infrastructure maintained by the City of Clovis Public Utilities Department. Future phases of the proposed project would require new wastewater treatment infrastructure that would extend beyond the proposed project boundaries.

The proposed wastewater conveyance facilities would connect to the existing sewer main lines. Wastewater treatment would be provided at the existing RWTP in the City of Fresno and by the City's Water Reuse Facility. By agreement with the City of Fresno, the City owns a maximum capacity of 9.3 mgd. The RWTP is operated by the City of Fresno, while subject to the equitable ownership interests of the City of Clovis, and has a maximum capacity of 80 mgd. If required, the City has the capability to acquire additional capacity at the RWTP. Wastewater treatment may also be provided by the ST-WRF. The ST-WRF serves the new growth areas of the City in the southeast, northwest, and the northeast urban centers. The ST-WRF is designed to accommodate future expansion and would ultimately treat 8.4 mgd. This, combined with the available capacity present at the RWTP would allow the City to support a wastewater flow of up to 17.7 mgd. According to the 2020 UWMP, of the City's wastewater flows in 2020, approximately 5.6 mgd was conveyed to the RWRF, while 2.2 mgd was treated at the ST-WRF for a total average daily flow of 7.8 mgd.

The City would manage service to the Master Plan Area to optimize the use of available capacity at each of the plants to facilitate service to the proposed project. According to the Wastewater Hydraulic Modeling Study in Appendix L, the proposed project would generate an estimated 0.92 mgd of

wastewater flow. The Wastewater Hydraulic Modeling Study recommends the development of a new gravity-only wastewater conveyance system to address wastewater infrastructure needs, including the off-site installation of 600 feet of 12-inch gravity pipes, an additional 4,700 feet of 12-inch gravity pipes, and 2,400 feet of 15-inch gravity pipes.

Furthermore, according to the 2017 Wastewater Collection System Master Plan, the RWTP could support a total flow capacity of 10.181 mgd from the Herndon, Fowler, Sierra, and Peach service areas, while the ST-WRF could support a total flow capacity of 8.4 mgd from the Northwest, Northeast, and Southeast service areas. The Northwest, Northeast, and Southeast service areas have a total projected flow of 10.214 mgd at buildout of the General Plan. This discrepancy of 1.814 mgd is expected to be diverted to the Fowler Trunk Sewer which connects to the RWTP.[27] Given that the wastewater flows generated by the full buildout of the General Plan and proposed project would be supported by existing infrastructure in the City and in the City of Fresno, along with installation of a wastewater conveyance system, and that the City has the capability to acquire additional capacity at the RWTP, impacts related to wastewater treatment capacity would be less than significant.

Vista Ranch Development/MP Area 1

Construction

Impacts related to sufficient wastewater treatment capacity are limited to operational impacts. No respective construction impacts would occur.

Operation

The proposed Vista Ranch Development, as part of the proposed Master Plan, would construct a mixed-use development anticipated to provide up to 2,718 residential units, including single- and multi-family units at varying densities, mixed-use development including neighborhood commercial, and community recreation and parks. The Vista Ranch Development would include the construction of all new utilities infrastructure connections within public utilities easements and roadways. According to the Wastewater Hydraulic Modeling Study prepared for the proposed project (Appendix L), the proposed development would contribute a total peak dry weather flow of 0.92 mgd into the City's existing collection system.[28] The study recommended a gravity-only wastewater conveyance system that includes the off-site installation of 600 feet of 12-inch gravity pipes, an additional 4,700 feet of 12-inch gravity pipes, and 2,400 feet of 15-inch gravity pipes. According to the 2020 UWMP, of the City's wastewater flows in 2020, approximately 5.6 mgd was conveyed to the RWRF, while 2.2 mgd was treated at the ST-WRF for a total average daily flow of 7.8 mgd. As discussed in UTIL-1, above, given the current capacity of the City's wastewater treatment infrastructure (17.7 mgd), the addition of the proposed development's projected wastewater flow of 0.92 mgd, combined with the existing wastewater flow of approximately 7.8 mgd, would not exceed the City's treatment capacity of 17.7. As such, the proposed development would have a less than significant impact related to wastewater treatment capacity.

[27] City of Clovis. 2017. City of Clovis, California–Wastewater Collection System Master Plan. April 5. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/Master%20Service%20Plan/2017-Draft-Wastewater-Master-Plan.pdf. Accessed May 28, 2025.

[28] AKEL Engineering Group, Inc. 2025. Vista Ranch Master Plan Wastewater Hydraulic Modeling Study. September.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope of the cumulative wastewater analysis is the City of Clovis, which provides wastewater collection and treatment services.

Combined with the RWTP, the City's wastewater treatment infrastructure has the capacity to treat approximately 17.7 mgd and, in 2020, treated 7.8 mgd of wastewater. All future projects that are tributary to the City's wastewater treatment infrastructure would be required to demonstrate that sewer service is available to ensure that adequate sanitation can be provided. The proposed project would generate an estimated 0.92 mgd. The Wastewater Hydraulic Modeling Study recommends the development of a new gravity-only wastewater conveyance system to address wastewater infrastructure needs, including the off-site installation of 600 feet of 12-inch gravity pipes, an additional 4,700 feet of 12-inch gravity pipes, and 2,400 feet of 15-inch gravity pipes. As the City's existing wastewater treatment system would have adequate capacity to serve the proposed project with installation of a wastewater conveyance system, the proposed project would not have a cumulatively significant impact related to wastewater.

Vista Ranch Development/MP Area 1

The cumulative setting for the Vista Ranch Development is the same as MP Area 2, described above. The Wastewater Hydraulic Modeling Study prepared for the proposed project accounted for demand associated with construction of the Vista Ranch Development. As noted in the MP Area 2 discussion above, the City's existing wastewater treatment system would have adequate capacity to serve the proposed Master Plan and, thus, the Vista Ranch Development with installation of a wastewater conveyance system. Therefore, the Vista Ranch Development would not have a cumulatively significant impact related to wastewater.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Attainment of Solid Waste Reduction Goals

Impact UTIL-4: The proposed project would not 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.

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. As such, no solid waste generation would occur as a result of the SOI Expansion. No impacts would occur.

Master Plan and MP Area 2

The City plans to annex the entirety of the Master Plan Area, including MP Area 2, bringing it within incorporated city limits. New residential, commercial, mixed-use, and public land uses in MP Area 2 would increase the amount of solid waste generated in the City. The increase in growth and development as a result of the implementation of the proposed Master Plan within MP Area 2 would result in an increase in solid waste at transfer stations and landfills and contribute to an increased demand for solid waste services throughout the Master Plan Area. In 2024, 73.6 percent (73,694.6 tons) of the City's solid waste was disposed of at the City of Clovis Landfill.[29] The landfill has an estimated closure date of April 4, 2047. The construction of the future development within MP Area 2 would be required to comply with Chapter 6.3.1 of the CMC, which requires that 50 percent of all waste tonnage be diverted from disposal. As described above in the Environmental Setting, in 2024, the City diverted its remaining waste to 10 other landfills. Because of the estimated closure date of the City of Clovis Landfill and the available landfills for diversion of waste, the future development of MP Area 2 would have a less than significant impact related to solid waste reduction goals.

Vista Ranch Development/MP Area 1

Construction

The proposed development would result in the construction of a mixed-use development anticipated to provide up to 2,718 residential units on a total of approximately 330.8 acres, including single- and

[29] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Jurisdiction Disposal and Beneficial Reuse by Destination – Clovis. Website: https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial. Accessed October 24, 2025.

multi-family units at varying densities and 20 acres of nonresidential uses including public parks and a community recreation center. Using residential and nonresidential construction waste generation rates published by the EPA, an estimate of the total construction debris generated by Vista Ranch Development is provided in Table 3.17-7.

Table 3.17-7: Construction Solid Waste Generation

Land use	Waste generation rate	Square footage	Construction waste generation	
			tons	Cubic yards
Residential	4.38 lbs per square foot	14,404,248	31,545	44,163
Nonresidential	4.02 lbs per square foot	871,200	1,589	1,135
Total	**—**	**—**	**33,134**	**45,298**

Notes:
lbs = pounds
1 ton = 2,000 pounds; 1 ton = 1.4 cubic yards
Source: United States Environmental Protection Agency (EPA). 1998. Characterization of Building-Related Construction and Demolition Debris in the United States. June.

Development of MP Area 1 would generate approximately 45,298 cubic yards of construction debris. This represents approximately 0.7 percent of the total capacity of the City of Clovis Landfill, which stands at 7,800,000 cubic yards.[30] Furthermore, the Vista Ranch Development would be required to comply with Chapter 6.3.1 of the CMC, which requires that 50 percent of all construction waste tonnage be diverted from disposal. The values shown in the above table do not adjust construction solid waste generation to account for debris recycling that would serve to divert waste from the landfill. Therefore, short-term construction impacts to solid waste reduction goals would be less than significant.

Operation

Using a waste generation rate of approximately 12.23 pounds per household per day, the proposed Vista Ranch Development's residential uses would generate approximately 17 tons per day, or 8,395 cubic yards per year.[31] The proposed Vista Ranch Development also includes up to 85,000 square feet of commercial uses. Using a waste generation rate of approximately 5 pounds of waste per 1,000 square feet per day, the proposed commercial uses would be expected to generate approximately 425 pounds per day, or 92 cubic yards per year.[32] As the remainder of the proposed nonresidential

[30] California Department of Resources, Recycling, and Recovery (CalRecycle). SWIS Facility/Site Activity Details City Of Clovis Landfill (10-AA-0004). https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial. Accessed October 2, 2025.

[31] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Estimated Solid Waste Generation Rates. Website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed June 4, 2025.

[32] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Estimated Solid Waste Generation Rates. Website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates. Accessed June 4, 2025.

uses would be public parks and recreational uses, they would not generate a significant amount of solid waste. As such, the waste generated from the proposed project would constitute approximately 0.1 percent of the City of Clovis Landfill's maximum capacity and approximately 0.85 percent of the landfill's maximum daily permitted throughput.[33] Moreover, these values do not account for recycling and waste reduction activities that would serve to divert waste from the landfill. As such, the City of Clovis Landfill has substantial existing capacity sufficient to accommodate the additional waste produced by the proposed Vista Ranch Development. Therefore, long-term operational impacts to solid waste reduction goals would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope of the cumulative solid waste analysis is the City, which would provide solid waste and recycling collection services for MP Area 2 and which operates solid waste landfills and oversees waste diversion programs within the City.

Cumulative projects, including those listed in Chapter 3, Environmental Impact Analysis, Table 3-1, consist predominantly of residential, commercial, and light industrial uses. However, as with the surrounding areas, new cumulative development (residential and nonresidential) would increase demand on solid waste facilities to receive, process, and store solid waste. Existing solid waste facilities provide sufficient capacity to serve all development anticipated in the City, as well as existing, planned, and probable future land uses in the City for the foreseeable future.

The City of Clovis Landfill has a permitted capacity of 7,800,000 cubic yards, with an estimated closure date of April 4, 2047. Because the City of Clovis Landfill has a substantial remaining capacity and the City can divert additional waste to other landfills in the vicinity with remaining capacity, the proposed development of MP Area 2, along with cumulative development, would not require additional landfill capacity. Additionally, future development within the Master Plan and other cumulative projects within the cumulative geographic context would be required to comply with

[33] California Department of Resources, Recycling, and Recovery (CalRecycle). 2025. Solid Waste Information System Facility /Site Activity Details – City of Clovis Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4529?siteID=347. Accessed June 4, 2025.

applicable federal, State, and local laws, regulations, and policies to address and mitigate, as necessary, any potentially significant impacts related to solid waste, including Chapter 6.3 of the CMC which aims to reduce the amount of solid waste being diverted to the landfill. Therefore, the future development of MP Area 2, in conjunction with other cumulative projects, would result in a less than significant cumulative impact related to solid waste generation and landfill capacity.

Vista Ranch Development/MP Area 1

The cumulative setting for the Vista Ranch Development is the same as MP Area 2, described above. The City of Clovis Landfill has a permitted capacity of 7,800,000 cubic yards, with an estimated closure date of April 4, 2047; the City of Clovis Landfill has substantial remaining capacity, as discussed above, and the City can divert additional waste to other landfills in the vicinity. The anticipated waste volume associated with the Vista Ranch Development represents only approximately 0.7 percent of the landfill's capacity during construction and approximately 0.85 percent of the landfill's permitted daily capacity during operation. Additionally, the Vista Ranch Development and other cumulative projects within the cumulative geographic context would be required to comply with applicable federal, State, and local laws, regulations, and policies to address and mitigate, as necessary, any potentially significant impacts related to solid waste, including Chapter 6.3 of the CMC which aims to reduce the amount of solid waste being diverted to the landfill. The Vista Ranch Development's contribution to this less than significant cumulative impact would not be cumulatively considerable. Therefore, the proposed Vista Ranch Development, in conjunction with other cumulative projects, would result in a less than significant cumulative impact related to solid waste generation and landfill capacity.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Solid Waste Regulations

Impact UTIL-5: The proposed project would comply with federal, State, and local statutes and regulations related to solid waste.

Impact Analysis

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development

Area. Thus, no solid waste generation would occur as a result of the SOI Expansion. No impacts would occur.

MP Area 2 and Vista Ranch Development/MP Area 1

The Master Plan would generate solid waste during construction operation and maintenance. Common construction waste may include metals, masonry, plastic pipes, rocks, dirt, cardboard, or green waste related to land development. A significant impact would occur if the proposed project would conflict with federal, State, or local management and reduction statutes and regulations related to solid waste. During construction, the proposed project would be required to comply with Chapter 6.3.1 of the CMC, which requires that at least 50 percent of construction waste tonnage be diverted from disposal, as well as Chapter 6.3.2, which requires the City to implement a recycling program in order to divert recyclable materials and organic waste from landfills. These measures would ensure compliance with the Integrated Waste Management Act by ensuring that project construction waste is transferred to facilities that can adequately recycle solid waste. Additionally, statewide ordinances, including AB 341, AB 939, and SB 1016, require waste reduction, recycling, and diversion. Therefore, the proposed project would be required to abide by and be consistent with federal, State, and local statutes and regulations related to solid waste, including the California Health and Safety Code, CCR, California Public Resources Code (PRC), and CMC. Therefore, the impact would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

As noted in the cumulative discussion for threshold UTIL-4, the proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The geographic scope of the cumulative solid waste analysis is the City, which would provide solid waste and recycling collection services for the Master Plan Area and which operates solid waste landfills and oversees waste diversion programs within the City.

Cumulative projects, including those listed in Table 3-1, consist predominantly of residential, commercial, and light industrial uses. However, as with the surrounding areas, new cumulative development (residential and nonresidential) would increase demand on solid waste facilities to receive, process, and store solid waste. Existing solid waste facilities provide sufficient capacity to

serve all development anticipated in the City, as well as existing, planned, and probable future land uses in the City for the foreseeable future.

The City of Clovis Landfill has a permitted capacity of 7,800,000 cubic yards, with an estimated closure date of April 4, 2047. Additionally, future development within the Master Plan and other cumulative projects within the cumulative geographic context would be required to comply with applicable federal, State, and local laws, regulations, and policies to address and mitigate, as necessary, any potentially significant impacts related to solid waste, including Chapter 6.3 of the CMC which aims to reduce the amount of solid waste being diverted to the landfill. Therefore, the future development of MP Area 2, in conjunction with other cumulative projects, would result in a less than significant cumulative impact related to solid waste generation and landfill capacity.

Vista Ranch Development/MP Area 1

The cumulative setting for the Vista Ranch Development is the same as MP Area 2, described above. The City of Clovis Landfill has a permitted capacity of 7,800,000 cubic yards, with an estimated closure date of April 4, 2047. The anticipated waste volume associated with the Vista Ranch Development represents approximately 0.7 percent of the landfill's capacity during construction and approximately 0.85 percent of the landfill's permitted daily capacity during operation. The proposed project's contribution to this less than significant cumulative impact would not be cumulatively considerable. Therefore, the proposed project, in conjunction with other cumulative projects, would result in a less than significant cumulative impact related to solid waste generation and landfill capacity.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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3.18 - Wildfire

3.18.1 - Introduction

This section describes the existing wildfire conditions in the project area, as well as the relevant regulatory framework. This section also evaluates the possible impacts related to wildfire that could result from implementation of the proposed project. Information in this section is based on information provided by the California Department of Forestry and Fire Protection (CAL FIRE), the California Department of Conservation (DOC), and the City of Clovis General Plan (General Plan).

The following public comments were received during the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP) scoping period related to wildfire:

- Comment expressing concern regarding the increased risk of wildfires due to climate change and wildfire impacts on wildlife. (pp. 3.18-2; 3.18-12)
- Comment noting there should be available functioning fire hydrants throughout the proposed development. (pp. 3.18-20 to 3.18-22)

3.18.2 - Environmental Setting

Wildfire Hazard Area Designations

The State has charged CAL FIRE with the identification of Fire Hazard Severity Zones (FHSZs) within State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs). The FHSZ maps are used by the State Fire Marshall as a basis for the adoption of applicable building code standards.

Fresno County

Fresno County (County) contains 291,792 acres of land located in a Very High FHSZ (VHFHSZ) within an SRA, 382,383 acres located in a High FHSZ within an SRA, and 129,323 acres located in a Moderate FHSZ within an SRA.[1] Most of the eastern portion of the County is designated as a Federal Responsibility Area (FRA). A large portion of the County is designated as an LRA.

City of Clovis

The City of Clovis (City) is entirely designated as an LRA. The Planning Area contains areas of Moderate FHSZ, most of which are outside of the City's Sphere of Influence (SOI).

[1] California Department of Forestry and Fire Protection (CAL FIRE). 2023. Fresno County State Responsibility Area Fire Hazard Severity Zones. June 15. Website: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map-2022/fire-hazard-severity-zones-maps-2022-files/fhsz_county_sra_11x17_2022_fresno_2.pdf. Accessed April 8, 2025.

SOI Expansion Area

The SOI Expansion Area is located within an LRA. The SOI Expansion Area is not categorized as a VHFHSZ by CAL FIRE. According to the General Plan, portions of the SOI Expansion Area, including portions of Master Plan (MP) Area 2 and MP Area 1 are located within a Moderate FHSZ. As of 2025, CAL FIRE has published FHSZ maps that delineate FHSZs in LRAs. Similar to the General Plan, CAL FIRE identifies portions of the SOI Expansion Area to be located within a Moderate FHSZ (Exhibit 3.18-1).[2] The nearest VHFHSZ to the SOI Expansion Area is located in an SRA and is approximately 3 miles north of the proposed SOI boundary.

Wildfire-conducive Conditions

Wildfires are a major hazard in the State. Wildfires burn natural vegetation on developed and undeveloped lands and include timber, brush, woodland, and grass fires.

The risk of wildfire is related to a variety of parameters, including fuel loading (vegetation), fire weather (winds, temperatures, humidity levels and fuel moisture contents), and topography (degree of slope). Steep slopes contribute to fire hazard by intensifying the effects of wind and making fire suppression difficult. Fuels such as grass are highly flammable because they have a high surface area to mass ratio and require less heat to reach the ignition point.

Fresno County

While low-intensity wildfires have a role in the County's ecosystem, wildfires put human health and safety, structures (e.g., homes, schools, businesses, etc.), air quality, recreation areas, water quality, wildlife habitat and ecosystem health, and forest resources at risk. Wildland fire hazards exist in varying degrees in the foothills of the Sierra Nevada Mountains. The County has areas with an abundance of flashy fuels (i.e., grassland) in the foothill areas.

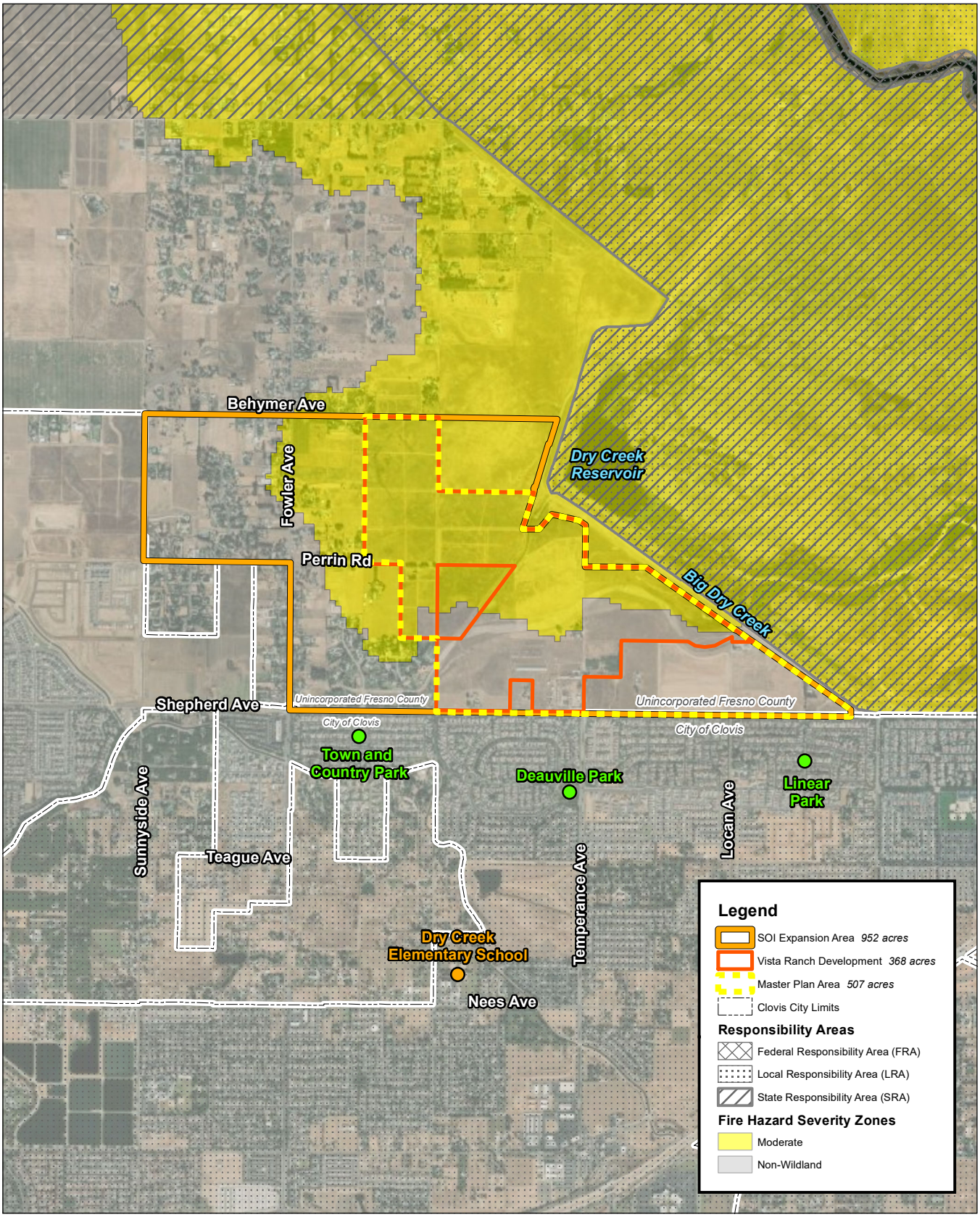
City of Clovis

Wildfires are a potential hazard to development, including land uses located in the foothill and forested areas of the City. The severity of wildfire problems depends on a combination of vegetation, climate, slope, and people. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of the County. In addition to natural factors such as lightning, human activity is a primary factor contributing to the incidence of wildfires. Campfires, smoking, debris burning, arson, public utility infrastructure, and equipment use are common human-related causes of wildfires.

SOI Expansion Area

The SOI Expansion Area is located on the valley floor on relatively flat topography, which is predominantly under agricultural or urban use, which is typically considered an area with a low fire hazard risk.

[2] California Department of Forestry and Fire Protection (CAL FIRE). 2025. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones. Accessed June 26, 2025.



Source: ESRI Aerial Imagery. City of Clovis. Harbour & Associates Civil Engineers, 08/21/2025. CAL FIRE FRAP.

2,500 1,250 0 2,500 Feet

Exhibit 3.18-1
Fire Hazard Severity Zones

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Emergency and Evacuation Routes/Access

CAL FIRE

CAL FIRE is responsible for fire protection and stewardship of over 31 million acres of California's privately owned wildlands.[3] CAL FIRE also provides varying levels of emergency services in 36 of California's 58 counties via contracts with local governments. As a result of its major incident management experience and department size, CAL FIRE is often asked to assist or take the lead in disasters.[4] In November 2018, the Camp Fire wildfire occurred in Northern California, resulting in the deadliest wildfire to occur in State history, causing 85 deaths, destroying 18,804 structures, and burning 153,336 acres of land.[5] In August 2020, the Santa Clara Unit (SCU) Lightning Complex wildfire occurred over Stanislaus, Santa Clara, Alameda, Contra Costa, and San Joaquin counties and burned 396,625 acres of land.[6]

Fresno County

Fresno County Master Emergency Services Plan

The Fresno County Master Emergency Services Plan serves as the Emergency Plan for the County. This plan serves as a guide for response to an emergency/disaster in the unincorporated areas of the Fresno County Operational Area and to coordinate and assist with the disaster response in jurisdictions both within and outside of the Fresno County Operational Area. In addition to the Fresno County Operational Area Master Emergency Services Plan, hazard-specific response plans and standard operating procedures have been developed or are in the process of development to supplement this master plan with disaster/emergency specific response procedures and information.

In the County, all major roads are available for evacuation, depending on the location and type of emergency that arises.

Fresno County Hazard Mitigation Plan, Annex A: City of Clovis

The County, along with 17 participating jurisdictions, prepared this local multi-jurisdictional Hazard Mitigation Plan (HMP) to better protect the people and property of the County from the effects of hazard events. This plan underwent a comprehensive update in 2023–2024, building upon the plan that was originally developed in 2009. This plan demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decision-makers direct mitigation activities and resources. This plan was also developed to make the County and participating jurisdictions eligible for certain federal disaster assistance, specifically, the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Grant Program (HMGP), Pre-Disaster Mitigation (PDM) program,

[3] California Department of Forestry and Fire Protection (CAL FIRE). 2025. About. Website: https://www.fire.ca.gov/about. Accessed October 14, 2025.

[4] Ibid.

[5] California Department of Forestry and Fire Protection (CAL FIRE). 2022. Top 20 Deadliest California Wildfires. October 24. Website: https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/newtop20_deadliest.pdf?rev=21f0605f442247d3ac8130a9d2cdd23e&hash=02C1990A731E4BFFF63618CC1B311023. Accessed October 14, 2025.

[6] Ibid.

Flood Mitigation Assistance (FMA), and Building Resilient Infrastructure and Communities (BRIC). This plan also meets the planning requirements of the National Flood Insurance Program's Community Rating System (CRS).

City of Clovis

The Clovis Fire Department (CFD) is responsible for providing fire suppression, technical rescue, hazardous materials spill/release mitigation, Emergency Medical Services (EMS), life safety and enforcement services, and emergency preparedness for the City. This responsibility includes the following functions: fire protection; EMS; urban search and rescue; high angle, trench, water, and confined space rescue; hazardous condition mitigation; strategic planning; administration; fire cause and origin investigations; code enforcement; public education; emergency preparedness; and disaster response and coordination. These responsibilities are distributed through three divisions: Emergency Operations, Community Risk Reduction, and Administration, which also consist of three auxiliary bureaus.[7]

As of 2023, CFD staff consisted of 70 sworn professional firefighters, fire engineers, fire officers, chief officers, fire inspectors, and administrative staff. The minimum staffing per shift is 19 sworn personnel, consisting of one battalion office, six captains, six engineers, and six firefighters (one chief officer, one truck company, and five engine companies). Fire and emergency services are provided to approximately 124,000 residents within the CFD's approximately 26 square mile service area.[8]

There are currently six fire stations in operational use in the City in addition to the CFD Headquarters, located at 1233 Fifth Street, and the CFD Training Center, located at 3455 Lind Avenue. The CFD fire stations and locations are each listed below.[9]

- Station 1–633 Pollasky Avenue
- Station 2–2300 Minnewawa Avenue
- Station 3–555 North Villa Avenue
- Station 4–2427 Armstrong Avenue
- Station 5–790 North Temperance Avenue
- Station 6–2388 Encino Avenue

City of Clovis Emergency Operations Plan

The City of Clovis Emergency Operations Plan (EOP) Basic Plan addresses the planned response for the City to emergencies associated with disasters, technological incidents, or other dangerous conditions created by either man or nature. It provides an overview of operational concepts, identifies components of the City emergency management organization, and describes the overall

[7] City of Clovis. 2025. About Clovis FD. Website: https://www.clovisca.gov/services/fire/index.php. Accessed October 14, 2025.

[8] Ibid.

[9] Clovis Fire Department (CFD). 2023. 2023 Annual Report. Website: https://cms2.revize.com/revize/clovis/documents/Services/Fire/About/SOC%20Annual%20Report/2023-Annual-Report.pdf. Accessed May 2, 2025.

responsibilities of local, State, and federal entities. The City will place emphasis on emergency planning; training of full-time, auxiliary, and reserve personnel; public awareness and education; and assuring the adequacy and availability of sufficient resources to cope with emergencies. Emphasis will also be placed on mitigation measures to reduce losses from disasters, including the development and enforcement of appropriate land use, design, and construction regulations.

The EOP's section on hazard mitigation establishes actions, policies, and procedures for implementing Section 409 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act following a presidentially declared emergency or major disaster. It also assigns hazard mitigation responsibilities to various elements of federal, State, and local governments in California.

SOI Expansion Area

Emergency and evacuation routes are available throughout the vicinity of the SOI Expansion Area.

State Route (SR) 168 is a divided four-lane highway running northeast to southwest through the study area. It provides connection from the intercity Fresno area to the Sierra Nevada Mountain range. Access points to SR-168 are located at Herndon Avenue, Fowler Avenue, Temperance Avenue, Owens Mountain Parkway, and Shepherd Avenue:

- Herndon Avenue is at the southern edge of the study area and connects SR-168 and the northern parts of Fresno to the west. Herndon Avenue is six lanes with a center turn lane.
- Fowler Avenue runs through the study area classified as a local street, changing to an arterial from Shepherd Avenue south to SR-168.
- Temperance Avenue begins in the center of the Master Plan Area and runs south to SR-168 and a collection of commercial land uses. The roadway is a four-lane divided road with bike lanes and sidewalks on each side.
- Owens Mountain Parkway connects to SR-168 and terminates prior to Nees Avenue without providing a connection under existing conditions. Future plans would extend this roadway to connect to Temperance Avenue at Alluvial Avenue. Owens Mountain Parkway is one lane in each direction with a center median and bike lanes on each side.
- Shepherd Avenue is an east-to-west running roadway that ranges from a two-lane road to a four-lane divided by a median roadway near the SOI Expansion Area, where it provides the southern boundary for the proposed project. Shepherd Avenue connects SR-168 to Willow Avenue at the western edge of the study area.

The nearest fire station to the SOI Expansion Area is Station 5, located at 790 North Temperance Avenue, approximately 1.55 miles south of the SOI Expansion Area. The City also has a mutual aid agreement in place with the Fresno County Fire Protection District, and their nearest station, Fire Station 85, is located approximately 1.05 miles south of the SOI Expansion Area.

Post-fire Slope Instability and Drainage Pattern Changes

Slope instability from wildfire scarring of the landscape can result in more intensive flooding and landslides. Post-fire slope soils and altered drainage patterns can more easily creep downslope sides of foundations and can also reduce lateral support.

City of Clovis

The General Plan Planning Area is on a very slight southwest slope of about 0.2 percent grade; elevations in the incorporated portion of the City range from about 335 feet above mean sea level (AMSL) at the southwest corner of the Planning Area to 435 feet AMSL at the northeast corner. Elevations in the SOI range up to about 390 feet AMSL at both the northern and eastern SOI boundaries. The terrain in the eastern and northeastern parts of the Plan Area is cut by numerous gullies and small canyons. The overall grade in those areas remains similar to that of the City and SOI; elevations in the Planning Area reach 584 feet AMSL.

Regionally, the major flood issues are associated with the San Joaquin River, the Kings River, and their tributaries.[10] Three major dams have been constructed to control flows on the rivers, including Friant and Mendota Dams on the San Joaquin River and Pine Flat Dam on the Kings River. In addition, several reservoirs, detention basins, and canals have been constructed on streams east of the Fresno-Clovis area to prevent flooding and to convey flows around developed areas.

SOI Expansion Area

The SOI Expansion Area is essentially flat; therefore, the potential for a landslide in the SOI Expansion Area is low to non-existent.

According to the FEMA Flood Insurance Rate Map (FIRM) (Exhibit 3.10-2), the majority of the SOI Expansion Area is located within an area of minimal flood hazard (Zone X areas determined to be outside the 0.2 percent [500-year] annual chance floodplain).[11] Portions of the SOI Expansion Area are located within the 500-year flood zone (Zone X, areas of 0.2 percent annual chance [500-year] flood; areas of percent annual chance [100-year] flood with average depths of less than 1 foot or with drainage areas with less than 1 square mile; and areas protected by levees from the 1 percent annual chance [100-year] flood). The central and western portions of the SOI Expansion Area, largely outside of MP Area 1, are within the 100-year flood zone (special flood hazard areas subject to inundation by the 1 percent annual chance flood). It is noted that a portion of the 100-year flood zone (associated with Big Dry Creek Reservoir Outlet Works Channel) runs in a southwesterly direction through the center of MP Area 1.

[10] City of Clovis. 2014. General Plan and Development Code Update Draft Environmental Impact Report, Chapter 5.9, Hydrology and Water Quality. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-09-Hydrology-and-Water-Quality.pdf.

[11] Federal Emergency Management Agency (FEMA). 2025. FEMA Flood Map Service Center. Website: https://msc.fema.gov/portal/search. Accessed May 15, 2025.

Water Infrastructure

City of Clovis

As described in Section 3.17, Utilities and Service Systems, the City's Public Utilities Department is responsible for many public services within the City, including water service, sewer service, recycled water service, refuse, streets, parks, street lighting and signals, and fleet maintenance. The City's Public Utilities Department is the only municipal water purveyor in the City and provides service to approximately 122,350 City customers.[12]

The City sources its potable water from a combination of groundwater, surface water, and recycled water. Surface water is drawn from the Kings River and is delivered to the City by the Fresno Irrigation District (FID). Groundwater is pumped from 37 municipal wells located throughout the City, drawing water from the Kings Subbasin. In 2023, approximately 53 percent of the City's water came from groundwater, with the remaining 47 percent being supplied by surface water treated at the City's Surface Water Treatment Plant.[13] This facility currently has a treatment capacity of 22.5 million gallons per day (mgd), with plans to expand to 45 mgd to accommodate future growth. With population projections estimating growth to 178,000 by 2040, the City continues to invest in infrastructure to ensure a reliable water supply for the future.[14]

SOI Expansion Area

The proposed project is comprised of numerous parcels that are currently being utilized in several ways including: fallow land, commercial landscaping, agricultural land, and residential. Because of the limited existing backbone infrastructure in the area, this development would depend on the existing infrastructure in Shepherd Avenue being operational.

There is a 16-inch transmission main in Shepherd Avenue that fronts the entire SOI Expansion Area from Fowler Avenue to DeWolf Avenue. South of Shepherd Avenue there are several mains that bring water to the SOI Expansion Area. There are existing 16-inch transmission mains in both Armstrong and Temperance Avenues and 12-inch distribution mains in Fowler and Locan Avenues.

[12] City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 15, 2025.

[13] City of Clovis Water Division. 2023. Annual Water Quality Report.

[14] City of Clovis. 2021. City of Clovis Urban Water Management Plan 2020 Update. Website: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 15, 2025.

3.18.3 - Regulatory Framework

Federal

United States Department of Interior

Review and Update of the 1995 Federal Wildland Fire Management Policy

1. **Safety**—Firefighter and public safety is the first priority. All Fire Management Plans and activities must reflect this commitment.
2. **Fire Management and Ecosystem Sustainability**—The full range of fire management activities will be used to help achieve ecosystem sustainability, including its interrelated ecological, economic, and social components.
3. **Response to Wildland Fire**—Fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale and across agency boundaries. Response to wildland fire is based on ecological, social, and legal consequences of the fire. The circumstances under which a fire occurs, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources, and values to be protected dictate the appropriate management response to the fire.
4. **Use of Wildland Fire**—Wildland fire will be used to protect, maintain, and enhance resources and, as nearly as possible, be allowed to function in its natural ecological role. Use of fire will be based on approved Fire Management Plans and will follow specific prescriptions contained in operational plans.
5. **Rehabilitation and Restoration**—Rehabilitation and restoration efforts will be undertaken to protect and sustain ecosystems, public health, and safety and to help communities protect infrastructure.
6. **Protection Priorities**—The protection of human life is the single, overriding priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be based on the values to be protected, human health and safety, and the costs of protection. Once people have been committed to an incident, these human resources become the highest value to be protected.
7. **Wildland Urban Interface**—The operational roles of federal agencies as partners in the Wildland Urban Interface are wildland firefighting, hazardous fuels reduction, cooperative prevention and education, and technical assistance. Structural fire suppression is the responsibility of tribal, State, or local governments. Federal agencies may assist with exterior structural protection activities under formal Fire Protection Agreements that specify the mutual responsibilities of the partners, including funding. (Some federal agencies have full structural protection authority for their facilities on lands they administer and may also enter into formal agreements to assist State and local governments with full structural protection.)
8. **Planning**—Every area with burnable vegetation must have an approved Fire Management Plan. Fire Management Plans are strategic plans that define a program to manage wildland and prescribed fires based on the area's approved land management plan. Fire Management Plans must provide for firefighter and public safety; include fire management

strategies, tactics, and alternatives; address values to be protected and public health issues; and be consistent with resource management objectives, activities of the area, and environmental laws and regulations.

9. **Science**—Fire Management Plans and programs will be based on a foundation of sound science. Research will support ongoing efforts to increase our scientific knowledge of biological, physical, and sociological factors. Information needed to support fire management will be developed through an integrated interagency fire science program. Scientific results must be made available to managers in a timely manner and must be used in the development of land management plans, Fire Management Plans, and implementation plans.
10. **Preparedness**—Agencies will ensure their capability to provide safe, cost-effective fire management programs in support of land and resource management plans through appropriate planning, staffing, training, equipment, and management oversight.
11. **Suppression**—Fires are suppressed at minimum cost, considering firefighter and public safety, benefits, and values to be protected, consistent with resource objectives.
12. **Prevention**—Agencies will work together and with their partners and other affected groups and individuals to prevent unauthorized ignition of wildland fires.
13. **Standardization**—Agencies will use compatible planning processes, funding mechanisms, training and qualification requirements, operational procedures, values to be protected methodologies, and public education programs for all fire management activities.
14. **Interagency Cooperation and Coordination**—Fire management planning, preparedness, prevention, suppression, fire use, restoration and rehabilitation, monitoring, research, and education will be conducted on an interagency basis with the involvement of cooperators and partners.
15. **Communication and Education**—Agencies will enhance knowledge and understanding of wildland fire management policies and practices through internal and external communication and education programs. These programs will be continuously improved through the timely and effective exchange of information among all affected agencies and organizations.
16. **Agency Administrator and Employee Roles**—Agency administrators will ensure that their employees are trained, certified, and made available to participate in the wildland fire program locally, regionally, and nationally as the situation demands. Employees with operational, administrative, or other skills will support the wildland fire program as necessary. Agency administrators are responsible and will be held accountable for making employees available.
17. **Evaluation**—Agencies will develop and implement a systematic method of evaluation to determine effectiveness of projects through implementation of the 2001 Federal Fire Policy. The evaluation will assure accountability, facilitate resolution of areas of conflict, and identify resource shortages and agency priorities.

State

California Emergency Response Plan

California has developed an emergency response plan to coordinate emergency services provided by federal, State, and local governments and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the California Governor's Office of Emergency Services, which coordinates the responses of other agencies. When the County experiences an emergency, an Emergency Operations Center may be opened. In the event an Emergency Operations Center is opened, emergency response team members coordinate efforts and work with local fire and police agencies, emergency medical providers, the California Highway Patrol, CAL FIRE, California Department of Fish and Wildlife (CDFW), and California Department of Transportation (Caltrans).

California Department of Forestry and Fire Protection Threat Potential Mapping

CAL FIRE has mapped fire threat potential throughout California. CAL FIRE FHSZ maps delineate fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). The threat levels include no fire threat, moderate, high, and very high fire threat. Further, the maps designate the City and the SOI Expansion Area to be within an LRA where the CFD is responsible for providing fire suppression and prevention services. Additionally, CAL FIRE produced a 2010 Strategic Fire Plan for California, which contains goals, objectives, and policies to prepare for and mitigate the effects of fire on California's natural and built environments. The CAL FIRE Office of the State Fire Marshal provides oversight of enforcement of the California Fire Code, as well as overseeing hazardous liquid pipeline safety.

California Building Standards Code

The State of California provided a minimum standard for building design through the 2022 California Building Standards Code (CBC), which is located in Part 2 of Title 24 of the California Code of Regulations (CCR). The 2022 CBC is based on the International Building Code but has been modified for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Commercial and residential buildings are plan-checked by local City and County building officials for compliance with the CBC. Typical fire safety requirements of the CBC include the installation of sprinklers in all new high-rise buildings and residential buildings; the establishment of fire resistance standards for fire doors, building material; and particular types of construction.

The CFD's Community Risk Reduction (CRR) Division is a key participant in the plan checking process for new development. The CRR Division reviews building plans to ensure compliance with the California Fire Code, the CBC, and local fire safety ordinances. This includes verifying fire access, water supply, hydrant placement, fire-resistant construction materials, and other fire protection features. The CRR Division works collaboratively with City building officials to ensure that all proposed developments meet or exceed fire safety standards, thereby reducing wildfire risk and enhancing community resilience.

California Public Resources Code

The California Public Resources Code (PRC) includes fire safety regulations that restrict the use of equipment that may produce a spark, flame, or fire; require the use of spark arrestors[15] on construction equipment that use an internal combustion engine; specify requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas.

These regulations include the following:

- Earthmoving and portable equipment with internal combustion engines would be equipped with a spark arrester to reduce the potential for igniting a wildland fire (PRC § 4442);
- Appropriate fire suppression equipment would be maintained during the highest fire danger period—from April 1 to December 1 (PRC § 4428);
- On days when a burning permit is required, flammable materials would be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and the construction contractor would maintain the appropriate fire suppression equipment (PRC § 4427); and
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines would not be used within 25 feet of any flammable materials (PRC § 4431).

Local

City of Clovis General Plan

The following policies of the General Plan related to wildfire are applicable to the proposed project:[16]

Environmental Safety Element

Policy 1.2 **Water system for fire hazards.** Maintain a water system to provide adequate peak water supply and system redundancy for firefighting services.

Policy 1.5 **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 1.6 **Public information and emergency preparedness.** Provide the public with accurate and reliable information regarding natural hazards to prevent and mitigate potential risks and exposure for life and property. Continue to maintain a local hazard mitigation plan and conduct programs to inform the general public of the City's emergency preparedness and disaster response procedures.

[15] A spark arrester is any device that prevents the emission of flammable debris from a combustion source (i.e., fireplaces, internal combustion engines, and wood-burning stoves).

[16] City of Clovis. 2014. City of Clovis General Plan. Website: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed February 13, 2025.

3.18.4 - Methodology

This evaluation focuses on whether the proposed project would result in changes to the physical environment that would cause or exacerbate adverse effects related to wildfires or whether the proposed project would expose people or structures to wildfire or post-wildfire conditions. The evaluation also includes a determination of whether the changes to the physical environment caused by the proposed project would impair or interfere with emergency response plans, expose people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, expose people/structures to downslope flooding or landslides, or include the installation or maintenance of infrastructure that may exacerbate fire risk.

Cumulative Analysis

The geographic scope of the cumulative wildfire analysis is the City. The cumulative impact analysis evaluates whether the impacts of the proposed project, together with the impacts of cumulative development, could result in a cumulatively significant impact with respect to wildfire. The analysis also considers whether incremental contribution of impacts associated with the implementation of the proposed project would be significant. Both conditions must apply for a project's cumulative effects to rise to the level of a significant impact. If there is no impact associated with respect to a particular California Environmental Quality Act (CEQA) threshold, discussion of cumulative impacts is not required. Accordingly, cumulative discussion is limited to the potential impacts as discussed below.

3.18.5 - Thresholds of Significance

The Lead Agency utilizes the criteria in the CEQA Guidelines Appendix G Environmental Checklist to determine whether wildfire impacts would be considered significant from implementation of the proposed project. As such, the City has determined that the proposed project would have a potential impact if located in or near SRAs or lands classified as VHFHSZs if it would:

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.

3.18.6 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Emergency Response/Evacuation Plan Consistency

Impact WILD-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. As such, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As such, no impact would occur.

MP Area 2

The County prepared an HMP. The HMP underwent a comprehensive update in 2024, building upon the plan that was originally developed in 2018. The HMP demonstrates the community's commitment to reducing risks from hazards and serves as a tool to help decision-makers direct mitigation activities and resources. Additionally, the City has an EOP which addresses the planned response for the City to emergencies associated with disasters, technological incidents, or other dangerous conditions created by either man or nature. The City does not currently have an adopted evacuation plan in place.

In Fresno County, all major roads are available for evacuation, depending on the location and type of emergency that arises. The proposed Master Plan does not include any actions that would impair or physically interfere with any of the County's or the City's emergency plans or evacuation routes. Future uses within MP Area 2 would have access to the County resources that establish protocols for safe use, handling, and transport of hazardous materials. Construction activities are not expected to result in any unknown significant road closures, traffic detours, or congestion that could hinder emergency vehicle access or evacuation in the event of an emergency. Any construction project that could involve road closures, traffic detours, or congestion would be required to obtain traffic control plans approved by the City as the Lead Agency. Therefore, implementation of the proposed Master Plan within MP Area 2 would have a less than significant impact with regards to this environmental issue.

Vista Ranch Development/MP Area 1

As discussed above, the proposed Vista Ranch Development would be subject to applicable policies and regulations within the County HMP and the City's EOP. Additionally, all major roads would be available for evacuation, depending on the location and type of emergency that arises. The proposed Vista Ranch Development does not include any actions that would impair or physically interfere with any of the County's emergency plans or evacuation routes. The Vista Ranch Development would have access to the County resources that establish protocols for safe use, handling, and transport of hazardous materials. Construction activities are not expected to result in any unknown significant road closures, traffic detours, or congestion that could hinder emergency vehicle access or evacuation in the event of an emergency. Any construction project that could involve road closures, traffic detours, or congestion would be required to obtain traffic control plans approved by the City as

the Lead Agency. Therefore, development of the proposed Vista Ranch Development would have a less than significant impact with regards to this issue.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

As previously mentioned, the City does not currently have an evacuation plan in place. However, development within the City would be subject to applicable policies and regulations within the County HMP and the City's EOP. As such, the City would be the geographic scope of the cumulatively considerable impact related to impairing or interfering with an emergency response plan or evacuation plan. The simultaneous construction of the multiple cumulative projects could temporarily interfere with the County HMP as the City's EOP evacuation routes that cumulative projects would use are arterial roadways that connect to major freeways. However, cumulative projects would be required to abide by the California Fire Code and CBC standards on fire access apparatus roads and fire safety design features, including local regulations on construction activities interfering with the public right-of-way. Since cumulative projects would adhere to State and local regulations, the proposed Master Plan would not result in a cumulatively considerable contribution related to interfering with or impairing an emergency response or evacuation plan, and the cumulative impact would be less than significant.

Vista Ranch Development/MP Area 1

As previously mentioned, the emergency response plan applicable to MP Area 1 is the County HMP and the City's EOP. As such, the geographic scope of the cumulatively considerable impact related to impairing or interfering with an emergency response plan or evacuation plan would be the City. The simultaneous construction of the multiple cumulative projects could temporarily interfere with the County HMP or the City's EOP. Evacuation routes that multiple cumulative projects would use are arterial roadways that connect to major freeways. In addition, cumulative projects would be required to abide by the California Fire Code and CBC standards on fire access apparatus roads and fire safety design features, including local regulations on construction activities interfering with the public right-of-way. Since cumulative project would adhere to State and local regulations, the proposed Vista Ranch Project would not result in a cumulatively considerable contribution related to interfering with

or impairing an emergency response or evacuation plan and the cumulative impact would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Expose Project Occupants to Pollutant Concentrations from Wildfire

Impact WILD-2:	**The proposed project would not, 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the SOI Expansion Area is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. As such, no impact would occur.

MP Area 2

MP Area 2 is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. While MP Area 2 is not in an SRA, a portion of the Master Plan Area, bordered by Fowler Avenue and Behymer Avenue, north of Shepherd Avenue, and west of North De Wolf Avenue, is designated in the General Plan as a Moderate FHSZ and in a LRA (Exhibit 3.18-2). Furthermore, CAL FIRE delineates portions of MP Area 2 to be within a moderate FHSZ and in an LRA. The proposed Master Plan would involve grading and clearing of the vegetation on-site to develop it with residential uses, and as such, the likelihood of risk from wildfires would not increase as a result of wildland fires. Furthermore, future development within MP Area 2 would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All plans would be reviewed for approval by the appropriate agencies. Therefore, the proposed Master Plan within MP Area 2 would have a less than significant impact with regards to this issue.

Vista Ranch Development/MP Area 1

As discussed above, MP Area 1 is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. While MP Area 1 is not in an SRA, a portion of MP Area 1 is designated in the General Plan and CAL FIRE FHSZ maps as a Moderate FHSZ and in a LRA (Exhibit 3.18-2).

Additionally, the SOI Expansion Area is relatively flat, and the proposed project would generally maintain the existing topology and would not include new or more pronounced slopes. The proposed Vista Ranch Development would involve grading and clearing of the site to develop it with residential uses, and as such, the proposed SOI Expansion Area would reduce the available fuel load which, in turn, would reduce fire potential. Additionally, implementation of regular construction site watering consistent with standard construction Best Management Practices (BMPs) would reduce risks associated with wildfire caused by unintentional equipment sparks during grading. Standard construction BMPs would also support the suppression of fire sources and appropriate response should fire result during construction activities.

Future development on the site would include fire-resistant structures consistent with the most recent CBC and fire codes as well as internal circulation elements that would act as fire breaks. As such, the SOI Expansion Area, with continued maintenance, would be less flammable, ignitable, and conducive to fire spread relative to current pre-project conditions. Additionally, the Vista Ranch Development would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure per the City of Clovis Municipal Code (CMC), the implementation of an irrigated, drought-resistant landscaping plan, and the development of defensible space. Furthermore, the 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. According to the Water Infrastructure Investigation prepared for the Master Plan Area, water infrastructure would exceed the minimum fire flow and residual pressure required by the CFD, with its recommendations integrated into the project design as required by the City's conditions of approval (COAs). These recommendations include constructing a new 16-inch main in Behymer Avenue from Baron Avenue to the westernmost connection point in Vista Ranch along the Behymer Avenue alignment. As such, the planned water distribution system for the proposed project would be adequate to convey water supply and support anticipated demands for the proposed project. Accordingly, the likelihood of risk from wildfires would not increase as a result of wildland fires. Furthermore, the proposed Vista Ranch Development would be required to comply with all applicable regulations related to establishing and maintaining water pressure as well as the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All construction plans related to the proposed project would be reviewed for approval by the appropriate agencies. Therefore, the proposed Vista Ranch Development would have a less than significant impact with regards to this issue.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

With respect to the potentially cumulative risk related to wildfire, the potential hazard to development is present in various areas of the City, particularly in areas with an abundance of fuel (i.e., grassland) and in the foothill areas of the City. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of Fresno County. MP Area 2 is not categorized as a VHFHSZ or a SRA, and increased development within MP Area 2 and surrounding areas would result in a decrease in wildfire risk, as sites would be graded cleared of fuel. Furthermore, as with the proposed Master Plan, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage.

Development of the proposed Master Plan would not result in significant increased risks of wildfire in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Development of the proposed Master Plan would have a less than significant cumulative impact relative to this environmental topic. As such, potential impacts related to wildfire would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

As discussed above, with respect to the potentially cumulative risk related to wildfire, the potential hazard to development is present in various areas of the City, particularly in areas with an abundance of fuel (i.e., grassland) and in the foothill areas of the City. The vegetation and topography found in the eastern portions of the City, coupled with hot, dry summers, present fire hazards during critical fire periods for much of the County. MP Area 1 is not categorized as a VHFHSZ or an SRA, and increased development on the Vista Ranch Development and surrounding areas would result in a decrease in wildfire risk, as sites would be graded cleared of fuel. Furthermore, as with the proposed Vista Ranch Development, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. Since the cumulative projects, including the proposed project, would adhere with the California Fire Code and CBC standards, the cumulatively considerable impact associated with direct or indirect exposure to wildland fires would have a less than significant cumulative impact. The proposed project's incremental contribution to direct or indirect exposure to wildland fires would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Infrastructure That Exacerbates Fire Risk

Impact WILD-3: **The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the SOI Expansion Area is not categorized as a VHFHSZ by CAL FIRE and is located within an LRA. As such, no impact would occur.

MP Area 2

Construction

Construction activities may temporarily increase fire risk due to equipment use and other construction actions on the SOI Expansion Area that could be ignition sources. Implementation of regular construction site watering consistent with BMPs would reduce risks associated with wildfire caused by unintentional equipment sparks during grading. Standard construction BMPs would also support the suppression of fire sources and appropriate response should fire result during construction activities. As such, the potential impacts would be less than significant.

Operation

While the proposed Master Plan does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk, it would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure per the CMC, the implementation of an irrigated and drought-resistant landscaping. The proposed project would include typical on-site infrastructure including roads, fire hydrants, and utilities similar to the adjacent communities. The installation and maintenance of such would be completed in a typical manner and would not exhibit unusual characteristics that would exacerbate fire risk or create additional temporary or ongoing impacts to the environment beyond those considered throughout this Revised Draft EIR. As the City receives development applications for subsequent development consistent the Master Plan, those applications would be reviewed by the City for compliance with the fire protection measures identified in the General Plan, the California Fire Code, and the PRC to ensure that fire risks are not exacerbated. As such, the proposed Master Plan does not include the installation and maintenance of any new infrastructure that would substantially exacerbate fire risk and impacts would be less than significant. Additionally, future development within MP Area 2 would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All plans would be

reviewed for approval by the appropriate agencies. As such, the potential impacts would be less than significant.

Vista Ranch Development/MP Area 1

Construction

As discussed above, construction activities may temporarily increase fire risk due to equipment use and other construction actions on the SOI Expansion Area that could be ignition sources. Implementation of regular construction site watering consistent with BMPs would reduce risks associated with wildfire caused by unintentional equipment sparks during grading. Standard construction BMPs would also support the suppression of fire sources and appropriate response should fire result during construction activities. As such, the potential impacts would be less than significant.

Operation

While the proposed Vista Ranch Development does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk, it would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure and the implementation of irrigated and drought-resistant landscaping. The proposed Vista Ranch Development would include typical on-site infrastructure including roads, fire hydrants, and utilities similar to the adjacent communities. The installation and maintenance of such would be completed in a typical manner and would not exhibit unusual characteristics that would exacerbate fire risk or create additional temporary or ongoing impacts to the environment beyond those considered throughout this Revised Draft EIR. Additionally, the proposed Vista Ranch Development would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. All plans would be reviewed for approval by the appropriate agencies. As such, potential impacts would be less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

While the proposed Master Plan does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk, it would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure and the implementation of an irrigated and drought-resistant landscaping. The proposed MP Area 2 would include typical on-site infrastructure, including roads, fire hydrants, and utilities similar to the adjacent communities. The installation and maintenance of such would be completed in a typical manner and would not exhibit unusual characteristics that would exacerbate fire risk or create additional temporary or ongoing impacts to the environment beyond those considered throughout this Revised Draft EIR. Additionally, MP Area 2 is not categorized as a VHFHSZ or an SRA, and increased development in MP Area 2 and surrounding areas would result in a decrease in wildfire risk, as sites would be graded cleared of fuel. Furthermore, as with the proposed Master Plan, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage.

Implementation of the proposed Master Plan would not result in significant increased risks of wildfire in the cumulative setting area, nor would it result in any significant off-site or indirect impacts. Implementation of the proposed Master Plan would have a less than significant cumulative impact relative to this environmental topic. As such, potential impacts related to wildfire would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

As discussed above, while the proposed Vista Ranch Development does not require the installation or maintenance of infrastructure specifically for the purposes of reducing wildfire risk, it would incorporate some inherently fire-resistant features, including the undergrounding of utility infrastructure, the implementation of irrigated and drought-resistant landscaping. The proposed Vista Ranch Development would include typical on-site infrastructure including roads, fire hydrants, and utilities similar to the adjacent communities. The installation and maintenance of such would be completed in a typical manner and would not exhibit unusual characteristics that would exacerbate fire risk or create additional temporary or ongoing impacts to the environment beyond those considered throughout this Revised Draft EIR. Additionally, MP Area 1 is not categorized as a VHFHSZ or an SRA, and increased development on the Vista Ranch Development and surrounding areas would result in a decrease in wildfire risk, as sites would be graded cleared of fuel. Furthermore, as with the proposed Vista Ranch Development, cumulative development in the region would be required to comply with all applicable regulations related to the provision of fire water, emergency access, and construction materials that would minimize and/or prevent fire loss and damage. Since the cumulative projects, including the proposed project, would adhere with the California Fire Code and CBC standards, the cumulatively considerable impact associated with direct or indirect exposure to wildland fires would have a less than significant cumulative impact. The proposed project's incremental contribution to direct or indirect exposure to wildland fires would be less than significant.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Flooding and Landslide Hazards Due to Post-fire Slope Instability/Drainage Changes

Impact WILD-4: **The proposed project would not 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.**

Impact Analysis

SOI Expansion and Non-development Area

The SOI Expansion is a reorganization action only and would not result in physical development and does not envision or entitle any development in the Non-development Area. Additionally, the SOI Expansion Area is essentially flat and is within an area of minimal flood hazard; therefore, the potential for a landslide in the SOI Expansion Area is low to non-existent. Accordingly, there would be no impact related to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes with approval of the SOI Expansion Area.

MP Area 2

MP Area 2 is essentially flat; therefore, the potential for a landslide in the MP Area 2 is low to non-existent. Some limited potential for slope instability risk could arise during grading and construction activities, where slopes could be over-steepened. However, with adherence to relevant CBC, impacts would be less than significant. Furthermore, the California Geological Survey Zones of Required Investigation map does not identify any seismically induced landslide zones in the City or in MP Area 2.[17] Additionally, as described above, most of MP Area 2 is located within an area of minimal flood hazard. A portion of MP Area 2 is located within the 500-year flood zone and the western border of the center parcel of MP Area 2, within the Big Dry Creek Reservoir Outlet Works Channel (a manufactured channel), is within the 100-year flood zone. Portions of the Master Plan Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Exhibit 3.10-3. The Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by the California Department of Water Resources, Division of Safety of Dams (DSOD) and maintenance by the dam owners ensure that dams are kept in safe operating conditions. There will always be a remote chance of dam failure that results in flooding within dam inundation areas, including the Master Plan Area and other surrounding areas. However, with oversight and ongoing monitoring performed by the DSOD, dam failure is considered to have an extremely low probability of occurring

[17] California Department of Conservation (DOC). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

and is not considered to be a reasonably foreseeable event. Because MP Area 2 would be built up, a wildfire would not be expected to result in downstream or downslope flooding or landslides that would significantly alter the proposed drainage system, which is expected to adequately manage all flood flows (See Section 3.10, Hydrology and Water Quality). As a result, the probability of downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, is less than significant.

Vista Ranch Development/MP Area 1

MP Area 1 is essentially flat; therefore, the potential for a landslide in MP Area 1 is low to non-existent. Some limited potential for slope instability risk could arise during grading and construction activities, where slopes could be over-steepened. However, with adherence to relevant CBC requirements, impacts would be less than significant. Additionally, the California Geological Survey Zones of Required Investigation map does not identify any seismically induced landslide zones in the City or in MP Area 1.[18] Furthermore, as discussed above, impacts related to flooding would be less than significant. As a result, the probability of downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes is less than significant.

Level of Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

Cumulative Analysis

SOI Expansion and Non-development Area

The proposed project would not have any impacts related to the SOI Expansion and Non-development Area. Therefore, no cumulative impact would occur.

MP Area 2

The Master Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving becoming unstable as a result of landslide. In order to minimize potential damage to the buildings and site improvements, all construction in California is required to be designed in accordance with the latest design standards of the California Building Code. Additionally, most of MP Area 2 is located within an area of minimal flood hazard. A portion of MP Area 2 is located within the 500-year flood zone, and a portion of the MP Area 2, within the Big Dry Creek Reservoir Outlet Works Channel (a manufactured channel), is within the 100-year flood zone.

[18] California Department of Conservation (DOC). 2025. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/. Accessed April 3, 2025.

The City has incorporated numerous policies relative to seismicity and flooding to ensure the health and safety of all people. Design in accordance with these standards and policies would reduce any potential impact to a less than significant level. As such, development of the proposed Master Plan would have a less than significant cumulative impact. Therefore, the potential impacts would result in a less than cumulatively considerable contribution.

Vista Ranch Development/MP Area 1

The Vista Ranch Development would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving becoming unstable as a result of landslide. In order to minimize potential damage to the buildings and site improvements, all construction in California is required to be designed in accordance with the latest design standards of the California Building Code. Additionally, most of MP Area 1 is located within an area of minimal flood hazard. A portion of MP Area 1 is located within the 500-year flood zone and a portion of MP Area 1, within the Big Dry Creek Reservoir Outlet Works Channel (a man-made channel), is within the 100-year flood zone.

The City has incorporated numerous policies relative to seismicity and flooding to ensure the health and safety of all people. Design in accordance with these standards and policies would reduce any potential impact to a less than significant level. As such, development of the proposed Vista Ranch Development would have a less than significant cumulative impact. Therefore, the potential impacts would result in a less than cumulatively considerable contribution.

Level of Cumulative Significance Before Mitigation

SOI Expansion and Non-development Area: No impact.
MP Area 2: Less than significant impact.
Vista Ranch Development/MP Area 1: Less than significant impact.

Mitigation Measures

None.

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CHAPTER 4

4 - EFFECTS FOUND NOT TO BE SIGNIFICANT

4.1 - Introduction

This chapter is based on the Revised Draft Environmental Impact Report (Revised Draft EIR) Notice of Preparation (NOP), dated March 3, 2025, and contained in Appendix A of this Revised Draft EIR. The NOP was prepared to identify the potentially significant effects of the proposed project and was circulated for public review between March 3, 2025, and April 2, 2025. In the course of the NOP evaluation, certain impacts were found to be less than significant because construction and operation of the proposed project would not result in such impacts. This chapter provides a brief description of effects found not to be significant or less than significant, based on the NOP, NOP public comments received, or more detailed analysis conducted as part of the EIR preparation process. One NOP comment was received related to Mineral Resources, requesting that the Revised Draft EIR address the loss of aggregate deposits due to the development of the proposed project. Note that a number of impacts that are found to be less than significant are addressed in the various EIR topical sections (Sections 3.1 through 3.18) to provide more comprehensive discussion of why impacts are less than significant, in order to better inform decision-makers and the general public.

4.1.1 - Mineral Resources

The California Geological Survey (CGS) Mineral Resources Project provides classifications for the State's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the State that contain regionally significant mineral resources as mandated by the Surface Mining and Reclamation Act (SMARA). These Mineral Resource Zones (MRZs) are listed below:

MRZ-1 Adequate information indicates that no significant mineral deposits are present or likely to be present.

MRZ-2 Adequate information indicates that significant mineral deposits are present, or a likelihood of their presence, and development should be controlled.

MRZ-3 The significance of mineral deposits cannot be determined from the available data.

MRZ-4 There is insufficient data to assign any other MRZ designation.

The Sphere of Influence (SOI) Expansion Area is designated MRZ-3, which is a classification for areas containing aggregate deposits, the significance of which cannot be evaluated from available data.[1]

[1] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. 5.11 Mineral Resources. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environ

SOI Expansion and Non-development Area

The proposed project consists of the expansion of the SOI to add approximately 952 acres into the City's SOI, including the approximately 507-acre Master Plan and the approximately 445-acre Non-development Area. The expansion of the SOI does not include any specific development proposals in the Non-development Area. The Non-development Area includes approximately 445 acres that would not receive any entitlements other than to be included in the SOI Expansion, and as such, no new development or improvements are proposed as part of the proposed project for the Non-development Area. As such, no impacts related to mineral resources would occur.

Master Plan Area 2

The City plans to annex the entirety of the Master Plan (MP) Area 2, bringing it within incorporated city limits. Implementation of the proposed Master Plan, exclusive of the Vista Ranch Development discussed below, would convert approximately 139 acres (MP Area 2) from their current uses, primarily fallow and grazing land and rural residential, to primarily residential, commercial, school/institutional, and parks/open space uses. Therefore, development of the Master Plan would result in the removal of all existing uses and structures, followed by the future construction of residential, commercial, and parks/open space uses, in addition to supporting roadways, utilities and infrastructure, new curbs and gutters, pedestrian and bicycle amenities, landscaping, street lighting, signage and other public and private uses. MP Area 2 falls within the City of Clovis General Plan (General Plan) Planning Area Boundary. The entire General Plan Planning Area is designated as MRZ-3, which indicates an Area where the significance of mineral deposits cannot be determined from the available data.[2] The General Plan and Development Code Update Environmental Impact Report (General Plan EIR) found that there are no mineral resource sectors, active or inactive mines, or mineral resources of significance within the Planning Area. Therefore, the General Plan EIR determined that urbanization of the agricultural lands within the General Plan Planning Area would have no impact on any known mineral resources, active or inactive mines, or any mineral resource sectors. As such, the proposed development of MP Area 2 would have no impacts related to mineral resources.

Vista Ranch Development/MP Area 1

Similar to MP Area 2 discussed above, the approximately 368-acre MP Area 1 is designated MRZ-3 and would convert the existing uses to primarily residential, commercial, and parks/open space uses. As detailed in the General Plan EIR, MP Area 1 does not contain any mineral resource sectors, active or inactive mines, or mineral resources of significance.[3] Therefore, implementation of the proposed Vista Ranch Development would not cause a loss of availability of known mineral resources that would be of value to the region and the residents of the State, nor would it cause a loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. As such, no impacts would occur.

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mental%20Impact%20Report/Chapter-05-11-Mineral-Resources.pdf Accessed February 13, 2025.

[2] City of Clovis. 2014. General Plan and Development Code Update Final Program Environmental Impact Report. 5.11 Mineral Resources. Website: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/Chapter-05-11-Mineral-Resources.pdf. Accessed February 13, 2025.

[3] Ibid.

CHAPTER 5

5 - OTHER CEQA CONSIDERATIONS

5.1 - Significant Unavoidable Impacts

California Environmental Quality Act (CEQA) Guidelines Section 15126.2(a)(c) requires an Environmental Impact Report (EIR) to identify and focus on the significant environmental effects of the proposed project, including effects that cannot be avoided if the proposed project were implemented.

This section describes significant impacts, including those that can be mitigated but not reduced to a level of less than significant. With implementation of the proposed project, the following significant impacts that cannot be avoided would occur:

- **Project-level Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas (GHG) Emissions:** The construction and operation of Master Plan (MP) Area 2 would generate GHG emissions, but the timing, scale, and nature of future development are currently unknown and driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be significant and unavoidable for MP Area 2.
- **Cumulative Conflict with Plan, Policy, or Regulation that Reduces GHG Emissions:** Because climate change is a global issue, GHG emissions are inherently cumulative. The environmental effects, such as sea level rise, higher temperatures, droughts, and wildfires, are already occurring. MP Area 2 would contribute to these impacts, and even with mitigation, its GHG emissions would be cumulatively considerable. Additionally, the construction and operation of cumulative projects in addition to MP Area 2 would generate GHG emissions, but the timing, scale, and nature of future development are currently unknown and would be driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be cumulatively considerable and significant and unavoidable.
- **Project-level Vehicle Miles Traveled (VMT) Impacts:** The proposed project has incorporated all feasible VMT-reducing project features, regulations, and mitigation measures that would be effective in reducing the impacts of the proposed project. However, the geography, development, and climate in the Clovis/Fresno region, and essentially the entirety of the San Joaquin Valley, are not conducive to residents being able to commute to work, perform the required shopping, and make other trips (such as health care or entertainment) via means of transportation such as walking, bicycling, or mass transit. As the Clovis/Fresno region is not a dense city with high-rise residential, office, health care, and shopping all within close proximity, and with high heat in the summer and cold/rain/fog in the winter, simply providing for and

promoting active transportation and transit opportunities does not generally result in a noticeable reduction in the number of vehicle miles residents must travel per day. Although the proposed project includes future transit route extensions, the regional transit system has not been developed to the extent that a majority of residents are willing to utilize it; therefore, on a project level, providing additional transit facilities would not be effective in reducing VMT to anything other than *de minimis* levels. Likewise, carpooling has been promoted for several decades with minimal benefit, as many employees tend to work different hours, do not live near each other, are required to attend appointments, or continue to enjoy the independence and opportunity to run other errands during the commute. For these reasons, the Supplemental Traffic Analyses prepared by Peters Engineering Group (Peters Engineering) dated September 12, 2025, determined that additional VMT mitigation measures would not be effective in further reducing the proposed project's VMT. As such, impacts would be significant and unavoidable even with the incorporation of Mitigation Measure (MM) TRANS-2.

- **Cumulative VMT Impacts:** Although the proposed project would incorporate a range of strategies, project design features, and MM TRANS-2, these measures would not be sufficient to offset the significant increase in VMT associated with new residential and employment uses as explained with respect to project-level VMT impacts. VMT, by definition, is cumulative; as such, the proposed project would contribute to an increase in VMT, and that increase would be considered significant and unavoidable. Therefore, the proposed project would result in a cumulatively considerable contribution to VMT. As such, the proposed project, in conjunction with other planned and approved projects, would result in a significant and unavoidable cumulative impact with respect to VMT.

5.2 - Growth-inducing Impacts

There are two types of growth-inducing impacts that a project may have: direct and indirect. To assess the potential for growth-inducing impacts, the project's characteristics that may encourage and facilitate activities that individually or cumulatively may affect the environment must be evaluated (CEQA Guidelines § 15126.2(e)). CEQA Guidelines, as interpreted by the City, state that a significant growth-inducing impact may result if the project would:

- Induce substantial population growth in an area (for example, by proposing new homes and commercial or industrial businesses beyond the land use density/intensity envisioned in the general plan);
- Substantially alter the planned location, distribution, density, or growth rate of the population of an area; or
- Include extensions of roads or other infrastructure not assumed in the general plan or adopted capital improvements project list, when such infrastructure exceeds the needs of the project and could accommodate future developments.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing unplanned population growth or by leading to the construction of

additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth (such as a new road into an undeveloped area or a wastewater treatment plant with excess capacity that could allow additional development in the service area). Construction of these types of infrastructure projects cannot be considered isolated from the development they facilitate and serve. Projects that physically remove obstacles to growth, or projects that indirectly induce growth, may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents.

Direct and indirect growth resulting from the proposed project was analyzed in Section 3.13, Population and Housing. Growth related to the development within the proposed project has already been factored into anticipated and forecasted growth within the City, and the portion of growth resulting from implementation of the Master Plan would not result in substantial unplanned growth in the City. As such, impacts related to direct and indirect population growth associated with the proposed project would be less than significant.

5.3 - Significant Irreversible Environmental Changes

As mandated by CEQA Guidelines Section 15126.2(d) and 15127, the EIR must evaluate and identify any significant irreversible environmental change(s) that would result from implementation of the proposed project. Primary impacts and, particularly, secondary impacts (such as a highway improvement that would provide access to a previously inaccessible area) generally commit future generations to similar uses. Specifically, pursuant to the CEQA Guidelines Section 15126.2(d)(c), such an impact would occur if:

- The proposed project would involve a large commitment of nonrenewable resources, which makes removal or nonuse thereafter unlikely;
- The proposed project involves uses in which irreversible damage could result from environmental accidents associated with the project; or
- The proposed project involves any irretrievable commitment of resources that is not justified (e.g., the project results in the wasteful use of energy). (Refer to Section 3.6, Energy, which addresses this topic in accordance with CEQA Guidelines Appendix F).

5.3.1 - Changes That Make Removal or Nonuse Unlikely

The proposed project involves the expansion of the City's Sphere of Influence (SOI) to include approximately 952 acres, adoption of a comprehensive Master Plan for 507 acres, and development of 368 acres with mixed uses over a 10-year buildout period within the 507-acre Master Plan Area.

Construction and operation would require substantial quantities of nonrenewable resources, including fossil fuels (for construction equipment and vehicles), water (from groundwater, surface, and recycled sources), minerals, and construction materials (concrete, steel, asphalt, etc.).

The infrastructure improvements (roads, utilities, bridges, water and wastewater systems) and residential/commercial buildings represent a long-term, largely irreversible commitment of these resources. Once developed, the area would be committed to urban uses, making removal or nonuse in the future unlikely.

5.3.2 - Irreversible Changes from Environmental Accidents

An irreversible change from an environmental accident would result if the proposed project would result in the release of hazardous materials into the environment as a result of accident conditions.

MP Area 2

As noted in Section 3.9, Hazards and Hazardous Materials, the proposed project would implement MM HAZ-2a through MM HAZ-2h. Accordingly, future development in MP Area 2 would be subject to a comprehensive set of mitigation measures to address potential hazards from hazardous materials and to ensure that irreversible changes from an environmental accident are mitigated to below a level of significance. Before grading, each property must undergo a Phase I Environmental Site Assessment (Phase I ESA) to identify any environmental concerns, followed by a Phase II ESA and further site characterization, if needed. If hazardous materials are found above regulatory thresholds, remediation and oversight by relevant agencies are required. Additional measures include preparing an Environmental Site Management Plan for properties with residual contamination, conducting vapor intrusion assessments for sites with volatile organic compounds and ensuring proper handling and removal of asbestos and lead-based paint during demolition. Imported soils must be tested for contaminants, and construction staging near sensitive receptors, like schools, must be minimized. Collectively, these requirements ensure that risks to public health and the environment are minimized and that all development complies with federal, State, and local regulations that would reduce and limit the risk of an accident.

During operations, the proposed project would not have the potential to cause significant environmental accidents through releases into the environment as it would not involve large quantities of hazardous materials. Therefore, the proposed project would not result in irreversible changes from environmental accidents.

Vista Ranch Development/MP Area 1

The mitigation measures for Vista Ranch Development/MP Area 1 (MM HAZ-2i through MM HAZ-2l) are designed to prevent irreversible changes from environmental accidents by requiring thorough site assessments, proper removal and disposal of hazardous materials, and strict adherence to regulatory standards. Before construction, wells, septic systems, and underground storage tanks must be properly abandoned or removed under agency oversight, and any asbestos or lead-based paint in existing structures must be identified and safely managed. During construction and operation, hazardous materials would be handled according to federal, State, and local regulations, minimizing the risk of accidental releases. These measures ensure that any potential contamination is identified and remediated before development proceeds and that ongoing activities do not result in long-term or permanent environmental harm. Collectively, this approach ensures that the proposed project would

protect soil, water, and public health, effectively preventing irreversible environmental damage from accidents during construction and operation.

5.3.3 - Consumption of Nonrenewable Resources

MP Area 2 and Vista Ranch Development/MP Area 1

During construction, the proposed project would involve the use of petroleum-based fuels such as diesel fuel and gasoline for the manufacture and transportation of building materials. However, as described in Section 3.6, Energy, the construction schedule for the proposed project is designed to be efficient to limit unnecessary equipment and fuel use. Furthermore, the proposed project would comply with all local and State regulatory requirements related to equipment age, operation, and design and, therefore, would not result in the unnecessary use of nonrenewable resources during construction.

During operations, as further detailed in Section 3.6, Energy, the proposed project would comply with Title 24 standards designed to decrease overall per capita energy consumption and would incorporate elements from CALGreen to reduce reliance on fossil fuel use. Accordingly, the proposed project would ensure the efficient use of resources, including the reduced consumption of nonrenewable resources, during operations.

5.4 - Mandatory Findings of Significance

CEQA Guidelines Section 15065 implements Public Resources Code Section 21083 by requiring lead agencies to make a finding of a “significant effect on the environment” if one or more of the following conditions exist:

1) A proposed project has the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare, or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.
2) The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.
3) The possible effects of a project are individually limited but cumulatively considerable.
4) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

Finding No. 1: **The proposed project would not have the potential to degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare, or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.**

Section 3.4, Biological Resources, addresses any impacts that might relate to the reduction of the fish or wildlife habitat, the reduction of fish or wildlife populations, and the reduction or restriction of the range of special-status species because of proposed project development. As described in Section 3.4, there could be potential impacts to fish, wildlife, or plant species and their habitats. However, impacts would be reduced to less than significant levels with the implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c.

Additionally, as noted in Section 3.5, Cultural Resources and Tribal Cultural Resources, any impacts to resources related to California history and prehistory would be reduced to a less than significant level with implementation of MM CUL-1a and MM CUL-1b.

Finding No. 2: **The proposed project would not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.**

The proposed project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals. While the proposed project provides near-term benefits such as housing, commercial services, and parks, it is consistent with the City's General Plan and long-term sustainability objectives. Although the proposed project would result in significant and unavoidable impacts related to VMT and GHG emissions, these impacts are primarily associated with regional growth patterns and transportation behavior rather than short-term tradeoffs that undermine long-term environmental goals. The proposed project incorporates mitigation measures and complies with applicable regulations, which reduce other potential impacts to less than significant levels. Therefore, the proposed project does not compromise long-term environmental objectives related to resource protection, climate planning, or community health.

Finding No. 3: **The possible effects of the proposed project are individually limited but cumulatively considerable.**

As described above in Section 5.1, Significant Unavoidable Impacts, the proposed project would not result in cumulatively considerable impacts, with the exception of GHG emissions and VMT impacts. The analysis of these impacts is provided in the cumulative impact discussion in Section 3.8, Greenhouse Gas Emissions, and Section 3.16, Transportation. Refer to those discussions for further details and analysis of the significant and unavoidable impact.

Finding No. 4: The environmental effects of the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly.

As analyzed under Chapter 3 of this EIR, the proposed project is not anticipated to result in substantial adverse effects on human beings. Potential significant impacts related to air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and wildfire would be mitigated to less than significant levels with the implementation of MM AIR-1a through MM AIR-3, MM HAZ-2a through MM HAZ-2l, MM NOI-1a and MM NOI-1b, MM GEO-1a and MM GEO-1b, MM GEO-6, and MM HYD-4. Compliance with and implementation of the proposed project's mitigation measures, existing regulations, and the City's standard permit conditions would ensure that the proposed project would not result in substantial adverse effects on human beings, including effects related to air pollution, seismic and geologic hazards, hazardous materials, hydrology and water quality, noise and vibration, and wildfires. Thus, impacts would be less than significant with mitigation implemented.

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CHAPTER 6

6 - ALTERNATIVES TO THE PROPOSED PROJECT

6.1 - Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Revised Draft Environmental Impact Report (Revised Draft EIR) contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this section is to provide decision-makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives while avoiding or reducing any of the project's significant adverse environmental effects. Important considerations for these alternatives analyses are noted below (as stated in CEQA Guidelines § 15126.6).

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid significant environmental effects.

6.1.1 - Significant Unavoidable Impacts

The proposed project was analyzed for potentially significant impacts related to each of the environmental topic areas discussed in the preceding sections. The results of the analysis demonstrate that the proposed project would result in the following significant unavoidable impacts:

- **Project-level Conflict with Plan, Policy, or Regulation that Reduces Greenhouse Gas (GHG) Emissions:** The construction and operation of Master Plan (MP) Area 2 would generate GHG emissions, but the timing, scale, and nature of future development are currently unknown and driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be significant and unavoidable for MP Area 2.
- **Cumulative Conflict with Plan, Policy, or Regulation that Reduces GHG Emissions:** Because climate change is a global issue, GHG emissions are inherently cumulative. The environmental effects, such as sea level rise, higher temperatures, droughts, and wildfires, are already occurring. MP Area 2 would contribute to these impacts, and even with mitigation, its GHG emissions would be cumulatively considerable. Additionally, the construction and operation of cumulative projects in addition to MP Area 2 would generate GHG emissions, but

the timing, scale, and nature of future development are currently unknown and would be driven by market forces. Because no specific projects are proposed yet and key details like size, intensity, and buildout year are unavailable, it is too speculative to assess consistency with current or future plans. This uncertainty prevents accurate analysis, leading to the conclusion that GHG impacts would be cumulatively considerable and significant and unavoidable.

- **Project-level Vehicle Miles Traveled (VMT) Impacts:** The proposed project has incorporated all feasible VMT-reducing project features, regulations, and mitigation measures that would be effective in reducing the impacts of the proposed project. However, the geography, development, and climate in the Clovis/Fresno region, and essentially the entirety of the San Joaquin Valley, are not conducive to residents being able to commute to work, perform the required shopping, and make other trips (such as health care or entertainment) via means of transportation such as walking, bicycling, or mass transit. As the Clovis/Fresno region is not a dense city with high-rise residential, office, health care, and shopping all within close proximity, and with high heat in the summer and cold/rain/fog in the winter, simply providing for and promoting active transportation and transit opportunities does not generally result in a noticeable reduction in the number of vehicle miles residents must travel per day. Although the proposed project includes future transit route extensions, the regional transit system has not been developed to the extent that a majority of residents are willing to utilize it; therefore, on a project level, providing additional transit facilities would not be effective in reducing VMT in anything other than *de minimis* levels. Likewise, carpooling has been promoted for several decades with minimal benefit as many employees tend to work different hours, do not live near each other, are required to attend appointments, or continue to enjoy the independence and opportunity to run other errands during the commute. For these reasons, the Supplemental Traffic Analyses prepared by Peters Engineering Group (Peters Engineering) dated September 12, 2025, determined that additional VMT mitigation measures would not be effective in further reducing the proposed project's VMT. As such, impacts would be significant and unavoidable even with the incorporation of Mitigation Measure (MM) TRANS-2.
- **Cumulative VMT Impacts:** Although the proposed project would incorporate a range of strategies, project design features, and MM TRANS-2, these measures would not be sufficient to offset the significant increase in VMT associated with new residential and employment uses. as explained with respect to project-level VMT impacts. VMT, by definition, is cumulative; as such, the proposed project would contribute to an increase in VMT and that increase would be considered significant and unavoidable. Therefore, the proposed project would result in a cumulatively considerable contribution to VMT. As such, the proposed project, in conjunction with other planned and approved projects, would result in a significant and unavoidable cumulative impact with respect to VMT.

6.1.2 - Alternatives to the Proposed Project

The three alternatives to the proposed project analyzed in this section are as follows:

- **Alternative 1 – No Project Alternative:** Under this alternative, the Sphere of Influence (SOI) Expansion, adoption of the Master Plan, and Vista Ranch Development would not occur. The

SOI Expansion Area would remain in its current condition, and no construction or land use activities of any kind would occur.

- **Alternative 2 – Reduced Density Alternative:** Under the Reduced Density Alternative, there would be downzoning throughout the Master Plan Area to very low residential density. The total unit count would decrease from 3,286 units under the proposed project to a total of 854 units under the Reduced Density Alternative. However, development would still occur throughout the same Master Plan Area as the proposed project. The area would be developed with fewer homes per acre, resulting in a more rural or semi-rural character. While the Reduced Density Alternative would still require the extension of infrastructure (such as roads, water, and sewer lines) to serve the new homes, the scale and intensity of these improvements would be reduced to accommodate the reduction in density.
- **Alternative 3 – Increased Mixed-use Alternative:** Under this alternative, the proposed project would include a reduced number of residential units to accommodate additional commercial and retail uses consistent with the proposed Mixed Use Village Land Use. Specifically, this alternative would increase the acreage of mixed-use development within the 507-acre Master Plan Area from 16 acres to 102 acres. This would result in approximately 20 percent of the Master Plan Area being defined as mixed-use development.

The three alternatives to the proposed project are analyzed below. These analyses compare the proposed project and each individual project alternative. In several cases, the description of the impact may be the same under each alternative when compared with the City's CEQA Thresholds of Significance (i.e., both the proposed project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the proposed project and each alternative, and this relative difference is the basis for a conclusion of greater or lesser impacts.

6.2 - Project Objectives

As stated in Chapter 2, Project Description, the objectives of the proposed project are to:

- Expand the City's SOI in an area contemplated by the City General Plan to establish a logical and orderly boundary that promotes the efficient extension of municipal services to areas planned for growth.
- Undertake master planning as a long-range planning tool to guide development within areas designated for growth under the City of Clovis General Plan.
- Provide residential housing opportunities that are visually attractive and accommodate the future housing demand in the City.
- Refine the mixture of housing types, sizes, and densities that collectively provide for local and regional housing demand.
- Provide infrastructure that meets City and Fresno Metropolitan Flood Control District (FMFCD) standards and is integrated with existing and planned facilities and connections.

- Establish a logical phasing plan designed to ensure that each phase of development would include necessary public improvements required to meet City standards.
- Develop a strong pedestrian network that links activities, recreational amenities, local commercial uses, and neighborhoods together.
- Establish neighborhood designs that consider safety and security of citizens.
- Consider affordability and housing diversity by developing residential uses that are proximate to urban services and roadways and varied in size and density.
- Embrace the natural resources and views of the Sierra Nevada Mountain range.

6.3 - Alternative 1—No Project Alternative

CEQA Guidelines Section 15126.6(e) requires EIRs to evaluate a No Project Alternative, which is defined as the "circumstances under which the project does not proceed." The purpose of the No Project Alternative is to allow decision-makers and the public to compare the potential environmental impacts generated from the proposed project with the existing environmental impacts associated with not approving the proposed project.

Under No Project Alternative (Alternative 1), the SOI expansion, adoption of the Master Plan, and Vista Ranch Development would not occur. No annexation of the SOI Expansion Area would occur. There would be no infrastructure improvements. The SOI Expansion Area would remain in its current condition, and no development or land use activities of any kind would occur.

6.3.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project would have no impact on scenic resources. The proposed project's impacts related to scenic vistas and existing visual character and quality of public views of the site and its surroundings, would be less than significant without mitigation. The proposed project's impacts related to new sources of light and glare would be less than significant with the implementation of MM AES-4, which provides project-specific nighttime lighting standards. Cumulative impacts would be less than significant without mitigation.

Under Alternative 1, no development would occur, and the SOI Expansion Area would remain in its existing state. Demolition of existing structures would not occur, and there would not be any tree and vegetation removal. As such, the visual character of the SOI Expansion Area would not change under this alternative compared to existing conditions, and no changes to scenic vistas would occur. Thus, similar to the proposed project, this alternative's impact conclusions for Impact AES-1 and AES-3 would be less than significant but, because of the lack of construction, reduced compared to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Alternative 1 would be located on the same SOI Expansion Area as the proposed project. As there are no officially designated State scenic highways or highways eligible for listing within or adjacent to

the SOI Expansion Area, there would be no impact to scenic resources within an officially designated State scenic highway. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

While this alternative would not result in increases to daytime glare or nighttime lighting, the impacts would not be eliminated entirely because of light generated by the existing uses in the SOI Expansion Area. As such, this alternative would have a less than significant impact related to light and glare. Therefore, this alternative's impact conclusion would be similar, but slightly reduced, compared to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Agriculture and Forestry Resources

As noted in Section 3.2, Agriculture and Forestry Resources, the proposed project would have no impact related to the rezoning or loss of forest land. The proposed project would have a less than significant impact related to the conversion of farmland and other existing environmental changes resulting in the conversion of farmland or forest land. For the proposed project, impacts related to Williamson Act Contracts would be less than significant with the incorporation of MM AG-2. Cumulative impacts related to agricultural and forestry resources would be less than significant with the implementation of the aforementioned mitigation.

The SOI Expansion Area contains areas zoned for agriculture, Farmland of Local Importance, and parcels within the SOI Expansion Area that are under Williamson Act Contracts. There are no identified forestry resources or timberland areas within the SOI Expansion Area. Under this alternative, no development would occur in the SOI Expansion Area and there would not be any rezoning or amendments to the existing zoning districts and land use designations. As such, Alternative 1 would have no impact related to conversion of farmland, Williamson Act Contracts, rezoning or loss of forest land, and other existing environmental changes resulting in conversion of farmland or forest land, and no cumulative impacts would occur. Thus, this alternative's impact conclusions would be reduced compared to the conclusion reached in Section 3.2, Agriculture and Forestry Resources.

Air Quality

As noted in Section 3.3, Air Quality, impacts related to objectionable odors would be less than significant without mitigation. Proposed project impacts related to consistency with the applicable air quality management plan and cumulative criteria pollutant emissions would be less than significant with the incorporation of MM AIR-1a through MM AIR-1d; impacts related to exposing sensitive receptors to pollutant concentrations would be less than significant with the implementation of MM AIR-3. Cumulative impacts related to air quality for the proposed project would be less than significant with the aforementioned mitigation.

Construction

Under Alternative 1, no construction or ground-disturbing activities would occur. Thus, no emissions of criteria pollutants, toxic air contaminants, or dust from activities such as grading, demolition, or building would occur and all thresholds related to construction air quality would be met. As such, there

would be no construction-related impact on air quality under Alternative 1. Therefore, this alternative's construction-related impact conclusion would be reduced compared to the conclusion reached in Section 3.3, Air Quality.

Operation

Under this alternative, the existing condition of the SOI Expansion Area would remain. The existing uses within the SOI Expansion Area were previously accounted for in the San Joaquin Valley Air Pollution Control District (SJVAPCD). However, while Alternative 1 would reduce emissions in comparison to the proposed project, it would not eliminate them. The existing rural residential uses and agricultural fields would continue to operate and generate mobile source emissions from visitors and residents traveling to and from the area. These emissions would persist and should be considered. As such, Alternative 1 would result in a less than significant impact with respect to operational air quality emissions. Therefore, this alternative's operational impact conclusion would be slightly reduced compared to the conclusion reached in Section 3.3, Air Quality.

Biological Resources

As discussed in Section 3.4, Biological Resources, the proposed project would have no impact with respect to conflicts with an adopted local, regional, or State habitat conservation plan (HCP). With respect to special-status species and other wildlife, impacts vary by project component and species group, including no impacts in the SOI Expansion and Non-development Area, and less than significant impacts with mitigation incorporated for development within MP Area 1 and MP Area 2. Impacts related to sensitive natural communities and wetlands and other jurisdictional features would be less than significant with mitigation incorporated, reflecting both direct and indirect effects of development. Impacts related to fish and wildlife movement corridors and nursery sites would likewise be less than significant with mitigation incorporated. Impacts related to conflicts with local biological resource policies or ordinances would be less than significant. Cumulative biological resources impacts would also be less than cumulatively considerable with implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c. There would be no impacts related to the SOI Expansion and Non-development Area.Under Alternative 1, the proposed project would not be constructed, no habitat would be removed, and no ground-disturbing activities would occur. As such, this alternative would have no impact related to biological resources. Thus, this alternative's impact conclusions would be reduced compared to the conclusion reached in Section 3.4, Biological Resources.

Cultural Resources and Tribal Cultural Resources

As noted in Section 3.5, Cultural Resources and Tribal Cultural Resources, the proposed project would have a less than significant impact related to historical resources, archaeological resources, human remains, and Tribal Cultural Resources (TCRs) with implementation of MM CUL-1a and MM CUL-1b. Cumulative impacts related to cultural resources and TCRs were determined to be less than significant without mitigation.

Under Alternative 1, no construction or ground-disturbing activities would occur, leaving any potential archaeological resources, human remains, and TCRs in the ground and undisturbed. Accordingly, no

impact to cultural resources and TCRs would occur. Thus, this alternative's impact conclusions would be reduced compared to the conclusion reached in Section 3.5, Cultural Resources and Tribal Cultural Resources.

Energy

As noted in Section 3.6, Energy, the proposed project's impacts related to energy would be less than significant without mitigation.

Under Alternative 1, no temporary on- or off-site energy usage from construction activities or unnecessary consumption of energy resources during operation would occur. Since the SOI Expansion Area currently remains largely undeveloped, with few existing uses, there would be a less than significant impact related to energy. Therefore, this alternative's impact conclusion would be similar but reduced, compared to the conclusion reached in Section 3.6, Energy.

Geology, Soils, and Seismicity

As noted in Section 3.7, Geology, Soils, and Seismicity, the proposed project would have no impact related to septic tanks or alternative wastewater disposal systems. Impacts related to unstable surface conditions would be less than significant without mitigation. The proposed project's impacts related to the risk of loss, injury, or death involving seismic hazards, as well as soil erosion or loss of topsoil, expansive soil, and paleontological resources, would be less than significant with the incorporation of MM GEO-1a, MM GEO-1b, and MM GEO-6. The proposed project's cumulative impact would be less than significant without mitigation.

Since Alternative 1 does not involve the construction of new structures or any ground-disturbing activities, it would not result in impacts related to alternative wastewater disposal systems, significant paleontological resources, soil erosion or loss of topsoil, expansive soils, or unstable subsurface conditions. Therefore, because of the absence of construction or ground-disturbing activities under this alternative, no impacts to geology and soils would occur. Thus, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.7, Geology, Soils, and Seismicity.

Greenhouse Gas Emissions

As noted in Section 3.8, Greenhouse Gas Emissions, the proposed project would have a less than significant impact related to GHG emissions with the incorporation of MM GHG-1a through MM GHG-1e. However, MP Area 2 would result in a significant and unavoidable impact, both at the project level and cumulatively, related to conflicting with an adopted GHG-reducing plan.

Construction

Alternative 1 would not involve any on-site or off-site construction activities. Therefore, construction-related GHG emissions would not be released, and no construction-related impacts would occur. Thus, this alternative's impact conclusion for construction-related GHG emissions would be reduced compared to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Operation

This alternative would not introduce any new uses on the SOI Expansion Area that would result in new GHG emissions. However, the SOI Expansion Area currently contains existing rural residential uses and agricultural fields which would continue to operate under this alternative. These existing uses would generate ongoing operational GHG emissions, including from mobile sources such as vehicle trips. Thus, Alternative 1 would result in a less than significant impact with respect to operational GHG emissions. Therefore, given the lesser scale of existing uses, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Hazards and Hazardous Materials

As discussed in Section 3.9, Hazards and Hazardous Materials, the proposed project would have no impact related to location on a list of hazardous materials sites and proximity to a public airport safety hazard. The proposed project's impacts related to routine transport, use, or disposal of hazardous materials, wildland fires, and cumulative impacts would be less than significant without mitigation. Proposed project impacts related to hazardous materials upset risk would be less than significant with incorporation of MM HAZ-2a through MM HAZ-2h; impacts related to hazardous emissions proximate to a school would be less than significant with implementation of MM HAZ-2a through MM HAZ-2h, as well as MM NOI-1a.

This alternative would be on the same SOI Expansion Area as the proposed project. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or within the vicinity of an airport or adopted aviation land use plan. Therefore, this alternative's impact conclusion for Impact HAZ-4 and Impact HAZ-5 would be similar to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Alternative 1 would not require the use, transport, or disposal of potentially hazardous materials typically associated with construction activities. Currently, the SOI Expansion Area contains existing structures that may contain hazardous materials, such as asbestos-containing materials (ACM) or lead-based paint (LBP). Under Alternative 1, the homes and associated structures would remain undemolished and, therefore, removal and disposal of ACMs would not occur. Further, since no demolition and transportation of potentially hazardous materials would occur, this alternative would not emit or handle hazardous emissions within 0.25 mile of an existing or proposed school. Therefore, no construction-related impacts on hazards and hazardous materials would occur.

Under Alternative 1, existing uses in the SOI Expansion Area would continue under existing conditions. These uses are not anticipated to involve the routine use, storage, or disposal of hazardous materials. No changes in operation would occur that would have the potential to interfere with adopted emergency plans. No new structures would be introduced that would expose people to hazards related to wildland fires. As such, there would be no impact related to operational hazards. Overall, this alternative would result in no impact related to construction and operational hazardous materials. Therefore, all other impact conclusions related to hazards and hazardous materials for this

alternative would be reduced compared to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Hydrology and Water Quality

As noted in Section 3.10, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge, risk of pollutant release from site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site with implementation of MM HYD-4, and cumulative impacts would be less than significant without mitigation.

This alternative would be within the same SOI Expansion Area as the proposed project. Portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of the Division of Safety of Dams (DSOD). Regular inspection by DSOD and maintenance by dam owners ensure that dams are kept in safe operating conditions. Thus, impacts related to the risk of pollutant release from site inundation would be less than significant without mitigation. Since this alternative is located on the same SOI Expansion Area as the proposed project, impact conclusions related to risk of pollutant release from site inundation would be similar to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Since Alternative 1 would not require construction or ground-disturbing activities, there would be no impact with respect to hydrology and water quality during construction. All existing stormwater infrastructure would remain in the SOI Expansion Area and would remain in compliance with water quality standards and discharge requirements, and drainage patterns would remain the same. This alternative would maintain use of the existing on-site groundwater wells for domestic and agricultural uses, and any groundwater extracted by the water provider would be regulated under the Sustainable Groundwater Management Act (SGMA). Since no construction activities would occur and this alternative would continue to utilize the existing stormwater drainage system, impacts related to hydrology and water quality would be less than significant without mitigation. Therefore, all other impact conclusions related to hydrology and water quality for this alternative would be reduced compared to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Land Use and Planning

As noted in Section 3.11, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

Under Alternative 1, no construction activities would occur, and no linear features would be developed that would physically divide an established community. In addition, Alternative 1 would not alter the existing land use designations in the General Plan or the associated land use regulations. Since

Alternative 1 does not require construction activities or land use changes and existing uses consistent with the SOI Expansion Area's General Plan land use designations and zoning districts would remain in place, there would be no impact related to conflicting with a land use plan, policy, or regulation adopted to mitigate an environmental effect. Therefore, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.11, Land Use and Planning.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.1.1, Mineral Resources, the proposed project would have no project-level or cumulative impacts related to mineral resources. Since this alternative would remain on the same parcels as the proposed project and no mineral resources were identified within or adjacent to the SOI Expansion Area, there would be no impact to mineral resources. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 4.1.1, Mineral Resources.

Noise

As noted in Section 3.12, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The proposed project would have a less than significant impact related to substantial noise increase in excess of standards with incorporation of MM NOI-1a and MM NOI-1b; impacts related to groundborne vibration and noise levels would be less than significant with implementation of MM NOI-2. Cumulative impacts would be less than significant without mitigation.

Construction

Alternative 1 would not require construction or associated ground disturbance. As such, there would be no construction-related impacts with respect to substantially exceeding applicable standards for temporary or permanent noise levels, generating excessive groundborne vibrations, excessive noise levels within the vicinity of a public airport or airport land use plan, and cumulative impacts resulting in reduced impacts related to noise compared to the proposed project. Therefore, this alternative's construction-related impact conclusions would be reduced compared to the conclusion reached in Section 3.12, Noise.

Operation

Alternative 1's operation would include noise levels associated with existing residential and agricultural uses, along with traffic noises from vehicle trips to and from those uses. This would remain constant with existing traffic levels, and the number of daily vehicle trips and associated noise would be notably reduced as compared to the proposed project. Furthermore, no permanent sources of groundborne vibrations exist within the Master Plan Area or surrounding area, and the SOI Expansion Area is not located within the vicinity of a public airport or airport land use plan. Since stationary noise sources would remain constant with existing conditions, mobile noise levels generated by traffic would not be doubled, and no permanent sources of groundborne vibrations exist within the project vicinity, Alternative 1 would have a less than significant impact with respect to substantially exceeding applicable standards for temporary or permanent noise levels, generating excessive groundborne vibrations, and cumulative impacts. Impacts related to excessive noise levels

within the vicinity of a public airport or airport land use plan would have no impact. Therefore, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.12, Noise.

Population and Housing

As noted in Section 3.13, Population and Housing, with respect to population growth, housing displacement, and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Under this alternative, no residential uses would be demolished or developed and no direct increase in population on the SOI Expansion Area would occur. Further, no extension of roadways or infrastructure would be constructed that could indirectly induce unplanned population growth. As such, Alternative 1 would have no impact related to population growth or the displacement of existing people or housing. Therefore, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.13, Population and Housing.

Public Services

As noted in Section 3.14, Public Services, the proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, park and recreation facilities, and cumulative impacts.

Under this alternative, no temporary construction or ground disturbance activities would occur that could interfere with emergency response times or performance objectives. Alternative 1 would operate under the same land use regulations as existing conditions and would not include new residential units or an increase in population that would increase demand for existing public services or necessitate the construction of new or expanded facilities. Thus, this alternative would have no impact on public services. Therefore, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.14, Public Services.

Recreation

As noted in Section 3.15, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Alternative 1 would not include the construction of new residences that would increase population and, in turn, demand for recreational facilities. Additionally, this alternative would not include the construction of a recreational facility and, thus, would not cause an adverse effect on the environment through the development of a recreational facility. As such, Alternative 1 would have no impact related to recreation. Therefore, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.15, Recreation.

Transportation

As noted in Section 3.16, Transportation, the proposed project's impacts related to bicycle, pedestrian, and transit facility circulation would be less than significant without mitigation. The proposed project's impact related to roadway safety hazards would be less than significant with the incorporation of MM TRANS-3a through MM TRANS-3f; impacts related to emergency access would be less than significant with the implementation of MM TRANS-4. The proposed project's impacts related to VMT and cumulative impacts would be significant and unavoidable.

Under this alternative, no construction activities would occur and no new on-site roadways, bicycle, or pedestrian facilities, or off-site pedestrian facilities would be constructed. No hazardous geometric design features, incompatible uses, or features exacerbating inadequate emergency access would be implemented. The SOI Expansion Area would continue to be served by existing public transit services. As such, this alternative would have no impact related to bicycle, pedestrian, and transit facility circulation and roadway safety hazards.

Alternative 1 would still include vehicle trips to and from the existing residential and agricultural uses on the SOI Expansion Area. However, these vehicle trips would result in a reduced number of vehicle trips as compared to the proposed project because of the limited scale of existing development. Thus, Alternative 1 transportation impacts related to VMT and cumulative impacts would be less than significant.

Overall, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.16, Transportation.

Utilities and Service Systems

As noted in Section 3.17, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Under Alternative 1, existing uses would continue to be served by surrounding utility providers that are already accounted for in those service providers' planning and capacity projections. As a result, existing uses under the Alternative 1 would not contribute to generating a substantial amount of wastewater or solid waste that would exceed the existing capacity of regional wastewater treatment facilities or landfills. As the SOI Expansion Area contains rural residential uses and agricultural fields already served by applicable utility providers, impacts would be less than significant related to utilities and service systems. Therefore, this alternative's operational impact conclusions would be similar but reduced, compared to the conclusion reached in Section 3.17, Utilities and Service Systems.

Wildfire

As noted in Section 3.18, Wildfire, the proposed project's impact related to wildfires would be less than significant without mitigation.

Alternative 1 would be located within the same SOI Expansion Area as the proposed project. The SOI Expansion Area is relatively flat and is not located within a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE). According to the Federal Emergency Management Agency (FEMA), the SOI Expansion Area is located within Flood Hazard Zone X, an area determined to be outside the 0.2 percent (500-year) annual chance floodplain. Additionally, portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. Moreover, under this alternative, no new development of structures or infrastructure would occur within the SOI Expansion Area. No changes in operation would occur that would have the potential to interfere with adopted emergency plans. As such, this alternative would have no impact related to wildfire. Therefore, this alternative's operational impact conclusions would be reduced compared to the conclusion reached in Section 3.18, Wildfire.

6.3.2 - Conclusion

Under Alternative 1, no construction or ground-disturbing activities would occur and no physical changes would be made to the SOI Expansion Area. Existing land uses and conditions would be preserved, with no new residential development, infrastructure, or annexation. As a result, Alternative 1 would avoid or reduce impacts associated with aesthetics, light, and glare; agriculture and forestry resources; air quality; biological resources; cultural resources and TCRs; energy; geology, soils, and seismicity; GHG emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services; recreation; utilities and service systems; and wildfire, when compared to the proposed project. This would eliminate the need for all mitigation measures required for the proposed project. Impacts related to mineral resources would be the same as the proposed project. Additionally, this alternative is anticipated to avoid the proposed project's significant and unavoidable impact related to VMT.

Although Alternative 1 would avoid many of the physical environmental impacts associated with new development, it would also not realize several of the benefits of the proposed project, such as roadway, circulation, and public service improvements. Under this alternative, no roadway, circulation, or public service improvements would be implemented, and the SOI Expansion Area would remain under County jurisdiction. As a result, existing roadway segments, including Fowler Avenue between Shepherd and Behymer Avenues, would remain in their current configuration, with limited opportunity for capacity, safety, or operational improvements that could otherwise be implemented through City planning, annexation, and development review processes. Similarly, Alternative 1 would not introduce enhanced municipal services, such as City-level fire protection and emergency response infrastructure, that would accompany annexation and development under the proposed project. While fewer structures under Alternative 1 would reduce exposure to damage, the absence of coordinated infrastructure and service improvements would limit opportunities to reduce risk, improve emergency response capabilities, and address existing deficiencies over time.

Alternative 1 would also not accomplish any of the proposed project's objectives discussed in Section 6.2 above. This alternative would not include the expansion of the City's SOI, establishment of a master plan for the Master Plan Area, establishment of a phasing plan for future development, provision of new infrastructure, development of a strong pedestrian network, or establishment of safe and secure neighborhood designs. This means the City would not be able to plan for or provide municipal services to this area in a coordinated manner. Without any development or annexation, no phasing plan would be created and there would be no mechanism to coordinate infrastructure or public improvements over time. Furthermore, this alternative would not provide residential housing opportunities, would not develop residential uses proximate to urban services, and would not help to meet regional housing demand. Accordingly, this alternative would not satisfy any of the project objectives. Finally, under Alternative 1, no new infrastructure would be constructed, and the SOI Expansion Area would continue to rely on existing infrastructure without a coordinated mechanism for long-term upgrades or service improvements.

6.4 - Alternative 2—Reduced Density Alternative

Under the Reduced Density Alternative (Alternative 2), there would be downzoning throughout the Master Plan Area to very low residential density. The total unit count would decrease from 3,286 units under the proposed Master Plan to a total of 854 units under the Reduced Density Alternative. However, development would still occur throughout the Master Plan Area. The other components of the proposed project, including commercial, community recreational, and parks and recreation, would be identical under this alternative. The SOI expansion and annexation of the entire SOI Expansion Area would still occur. No development would be assumed outside of the Master Plan Area.

6.4.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project would have no impact on scenic resources. The proposed project's impacts related to scenic vistas and existing visual character and quality of public views of the site and its surroundings, would be less than significant without mitigation. The proposed project's impacts related to new sources of light and glare would be less than significant with the implementation of MM AES-4, which provides project-specific nighttime lighting standards. Cumulative impacts would be less than significant without mitigation.

Alternative 2 would be located within the same SOI Expansion Area as the proposed project. As there are no officially designated State scenic highways or highways eligible for listing within or adjacent to the SOI Expansion Area, there would be no impact to scenic resources within an officially designated State scenic highway. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Alternative 2 would develop fewer residential units, resulting in nominally reduced construction activities as compared to the proposed project. Construction activities, including demolition and grading, may temporarily and intermittently affect scenic views and visual character from distant panoramic viewpoints. Operationally, this alternative would still introduce new vertical structures. This

development would change the scenic views and visual character in the project area, as well as introduce additional sources of light and glare compared to existing conditions in the Master Plan Area. However, development under this alternative would be required to be consistent with the General Plan and the Zoning Ordinance. Further, the City of Clovis Municipal Code (CMC) Title 9, Development Code Division 3, includes a series of development and operational standards intended to minimize and mitigate the potential impacts of development within the City and promote compatibility with surrounding areas and land uses. These standards include requirements related to exterior light and glare (Section 9.22.050), fences, walls, and hedges (Section 9.24.060), height measurement and height limit exceptions (Section 9.24.080), screening and buffering (Section 9.24.090), setback regulations and exceptions (Section 9.24.100), landscaping standards (Chapter 9.28), tree protection standards (Chapter 9.30), and signs (Chapter 9.34). Consistency with General Plan and the Zoning Ordinance requirements would ensure that this alternative would have a less than significant impact related to vistas and existing visual character and quality of public views of the site and its surroundings. This alternative would also be required to implement MM AES-4 to reduce potential impacts related to new sources of light and glare to less than significant levels. Therefore, this alternative's impact conclusions would be similar, but slightly reduced, compared to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Agriculture and Forestry Resources

As noted in Section 3.2, Agriculture and Forestry Resources, the proposed project would have no impact related to the rezoning or loss of forest land. The proposed project would have a less than significant impact related to the conversion of farmland and other existing environmental changes resulting in the conversion of farmland or forest land. For the proposed project, impacts related to Williamson Act Contracts would be less than significant with the incorporation of MM AG-2. Cumulative impacts related to agricultural and forestry resources would be less than significant with the implementation of the aforementioned mitigation.

The SOI Expansion Area contains areas zoned for agriculture, Farmland of Local Importance, and parcels within the SOI Expansion Area that are under Williamson Act Contracts. Since SOI Expansion Area rezoning and development would still occur under this alternative, there would be conversions of existing designated farmland and conflicts with existing Williamson Act Contracts. A Land Evaluation and Site Assessment (LESA) Model was prepared for the proposed project, which encapsulates the footprint of this alternative. This LESA Model complies with measures from the General Plan EIR for mitigation of farmland conversion impacts. Moreover, Alternative 2 would still require implementation of MM AG-2, which ensures that the appropriate approvals are received under the "Williamson Act Cancellation Process, Guide for Local Governments" prior to any development. Additionally, less direct development on the Master Plan Area would occur given the reduction in intensity of development compared to the proposed project. With the completion of the LESA Model and incorporation of MM AG-2, this alternative would have a less than significant impact on the conversion of farmland and conflicts with Williamson Act Contracts. Therefore, this alternative's impact conclusions would be similar, compared to the conclusion reached in Section 3.2, Agriculture and Forestry Resources.

There are no identified forestry resources or timberland areas within the SOI Expansion Area. As such, development on the SOI Expansion Area under this alternative would not impact forestry resources. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.2, Agriculture and Forestry Resources.

Air Quality

As noted in Section 3.3, Air Quality, impacts related to objectionable odors would be less than significant without mitigation. Proposed project impacts related to consistency with the applicable air quality management plan and cumulative criteria pollutant emissions would be less than significant with incorporation of MM AIR-1a through MM AIR-1d; impacts related to exposing sensitive receptors to pollutant concentrations would be less than significant with implementation of MM AIR-3. Cumulative impacts related to air quality for the proposed project would be less than significant with the aforementioned mitigation.

Construction

Construction of Alternative 2 would involve demolition, ground disturbance, and off-site transport of materials, potentially generating objectionable odors, criteria air pollutants, fugitive dust, and diesel particulate matter (DPM). Given its reduced development density, Alternative 2 would likely involve a lower intensity and potentially shorter duration construction period than the proposed project, requiring fewer resources. Odors from exhaust would be temporary and highly diffusive, resulting in a less than significant impact. In relation to the increase in criteria air pollutants, implementation of MM AIR-1a would require air quality emissions review for all applicable future development under this alternative to identify where further air pollution mitigation is appropriate. For fugitive dust and DPM, implementation of MM AIR-3 would require future development to conduct a Health Risk Assessment (HRA) and identify any construction-related health risks above the established SJVAPCD thresholds. As such, with the implementation of MM AIR-1a and MM AIR-3, construction-related air quality impacts would be reduced to a less than significant level. Therefore, this alternative would have similar, but slightly reduced, construction-related air quality impact conclusions compared to the conclusions reached in Section 3.3, Air Quality.

Operation

Alternative 2 would generate similar types of criteria pollutants as the proposed project because of its similarity in predominantly residential use. However, with fewer residential units, overall emissions would be lower. Because of the similarity in proposed uses, this alternative is anticipated to result in reactive organic gases (ROG) and nitric oxides (NO_X) emissions above SJVAPCD thresholds. As such, this alternative would be required to implement MM AIR-1c to reduce ROG emissions and MM AIR-1d to reduce overall criteria pollutants by requiring the execution of a Voluntary Emission Reduction Agreement (VERA) with the SJVAPCD for mitigation of criteria pollutants ROG and NO_X. Further, implementation of MM AIR-1b would require air quality emissions review for all applicable future development under this alternative to identify where further air pollution mitigation during operation is appropriate. Moreover, this alternative would not include operation of industrial or waste-related uses associated with objectionable odors. Thus, operational air quality impacts would be less than significant with implementation of MM AIR-1b, MM AIR-1c, and MM AIR-1d. Therefore, this

alternative would have similar, but slightly reduced, operational air quality impact conclusions compared to the conclusions reached in Section 3.3, Air Quality.

Biological Resources

As discussed in Section 3.4, Biological Resources, the proposed project would have no impact with respect to conflicts with an adopted local, regional, or State HCP. With respect to special-status species and other wildlife, impacts vary by project component and species group, including no impacts in the SOI Expansion and Non-development Area, and less than significant impacts with mitigation incorporated for development within MP Area 1 and MP Area 2. Impacts related to sensitive natural communities and wetlands and other jurisdictional features would be less than significant with mitigation incorporated, reflecting both direct and indirect effects of development. Impacts related to fish and wildlife movement corridors and nursery sites would likewise be less than significant with mitigation incorporated. Impacts related to conflicts with local biological resource policies or ordinances would be less than significant. Cumulative biological resources impacts would also be less than cumulatively considerable with implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c. There would be no impacts related to the SOI Expansion and Non-development Area.

The SOI Expansion Area is not located within an approved HCP. As such, Alternative 2 would have no impact on an approved HCP. Therefore, this alternative's impact conclusions related to approved HCPs would be the same as the conclusion reached in Section 3.4, Biological Resources.

Development of Alternative 2 would include demolition, ground disturbance, and removal of vegetation, as well as new structures within the Master Plan Area, which would have the potential to impact biological resources. The Master Plan Area contains special-status species, habitat for special-status species, and nursery sites, and wetlands, as well as the potential for wildlife movement corridors. As such, implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c would be required to achieve less than significant impacts related to biological resources. Given its reduced development density, Alternative 2 would likely involve a potentially shorter duration construction period than the proposed project. As a result, this alternative would have similar, but slightly reduced, impact conclusions compared to the conclusions reached in Section 3.4, Biological Resources.

Cultural Resources and Tribal Cultural Resources

As noted in Section 3.5, Cultural Resources and Tribal Cultural Resources, the proposed project would have a less than significant impact related to historical resources, archaeological resources, human remains, and TCRs with implementation of MM CUL-1a and MM CUL-1b. Cumulative impacts related to cultural resources and TCRs were determined to be less than significant without mitigation.

Compared to the proposed project, Alternative 2 would involve a similar level of ground disturbance, resulting in a similar likelihood of encountering historical resources, archaeological resources, human remains, or TCRs. Therefore, this alternative would not completely avoid ground disturbance and could uncover previously unknown resources. With implementation of MM CUL-1a and MM CUL-1b,

this alternative's impacts on cultural resources and TCRs would be reduced to a less than significant level. Therefore, this alternative's impact conclusions would be similar, compared to the conclusion reached in Section 3.5, Cultural Resources and Tribal Cultural Resources.

Energy

As noted in Section 3.6, Energy, the proposed project's impacts related to energy would be less than significant impact without mitigation.

Alternative 2 construction activities would include demolition, grading, and equipment transport, which would rely primarily on petroleum-based fuels. However, construction would be temporary. Additionally, because of the reduced scale of Alternative 2, construction is anticipated to require fewer resources, less equipment, and a shorter duration, resulting in lower energy consumption than the proposed project. As such, this alternative would have a less than significant impact on construction-related energy consumption. Alternative 2 would include energy usage related to the proposed residential uses during operation. Energy usage for this alternative would also be lower than the proposed project because there would be fewer residential units and occupants. Alternative 2 would be subject to all applicable State and local energy-efficient standards. Thus, operational impacts to energy would be less than significant. Therefore, this alternative's impact conclusions would be similar, but slightly reduced, compared to the conclusion reached in Section 3.6, Energy.

Geology, Soils, and Seismicity

As noted in Section 3.7, Geology, Soils, and Seismicity, the proposed project would have no impact related to septic tanks or alternative wastewater disposal systems. Impacts related to unstable surface conditions would be less than significant without mitigation. The proposed project's impacts related to the risk of loss, injury, or death involving seismic hazards, as well as soil erosion or loss of topsoil, expansive soil, and paleontological resources, would be less than significant with the incorporation of MM GEO-1a, MM GEO-1b, and MM GEO-6. The proposed project's cumulative impact would be less than significant without mitigation.

Alternative 2 would be constructed on the same Master Plan Area as the proposed project. Like the proposed project, construction would involve ground-disturbing activities that could increase soil erosion and disturb potential paleontological resources. However, compliance with the Construction General Permit and implementation of Best Management Practices (BMPs) would reduce erosion and topsoil loss and implementation of MM GEO-6 would outline the appropriate course of action if paleontological resources are discovered during construction of this alternative.

Moreover, given the proximity of active faults in relation to the Master Plan Area, this alternative would still require implementation of MM GEO-1a to ensure that geotechnical investigations would be conducted prior to development of new structures and MM GEO-1b to ensure that the area on the Master Plan Area already studied under a geotechnical investigation would include the applicable engineering recommendations for future development. No unstable soils were identified on the Master Plan Area by the previously prepared geotechnical investigation. Furthermore, Alternative 2 would not include construction of any new septic tanks. Thus, with implementation of MM GEO-1a,

MM GEO-1b, and MM GEO-6, this alternative would have a less than significant impact related to geology, soils, and seismicity. Therefore, this alternative's impact conclusions would be similar, compared to the conclusion reached in Section 3.7, Geology, Soils, and Seismicity.

Greenhouse Gas Emissions

As noted in Section 3.8, Greenhouse Gas Emissions, the proposed project would have a less than significant impact related to GHG emissions with the incorporation of MM GHG-1a through MM GHG-1e. However, MP Area 2 would result in a significant and unavoidable impact, both at the project-level and cumulatively, related to conflicting with an adopted GHG-reducing plan.

Construction

Alternative 2 would have a reduced development intensity as the proposed project. As such, the construction timeline and phases for this alternative are assumed to be reduced compared to that of the proposed project. Regardless, construction activities, such as demolition, equipment use, material transport, and worker commutes, would generate both direct and indirect GHG emissions that could cause significant impacts. As such, this alternative would require incorporation of MM GHG-1a, which would implement construction BMPs aimed at reducing emissions during equipment idling and the use of modern construction equipment. Further, GHG emissions associated with development of the proposed project would occur over the short term from construction activities. Therefore, with implementation of MM GHG-1a, GHG emissions associated with the construction of Alternative 2 would not be substantial and would not conflict with any GHG plans or policies. Impacts would be less than significant. Therefore, this alternative's construction-related impact conclusions would be similar, but slightly reduced, compared to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Operation

Operational emissions for this alternative would result from vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. Due to the decreased density, this alternative's GHG emissions would be decreased compared to the proposed project. However, 854 residential units would still be developed. Throughout the buildout period and on an ongoing, long-term basis, this alternative could generate GHG emissions that could have a significant impact on the environment. In order to reduce these impacts, Alternative 2 would need to implement MM GHG-1b through MM GHG-1e, which would restrict natural gas usage, implement all-electric landscaping equipment, require electric vehicle (EV) charging infrastructure to be developed, and unbundle parking costs. This alternative would also comply with applicable green building standards, the CMC, and the California Green Buildings Code (CALGreen).

However, even with mitigation, the speculative nature of future development in MP Area 2, including unknown buildout timing, project size, and intensity, prevents a definitive analysis of consistency with applicable GHG-reducing plans. As such, GHG impacts from Alternative 2 operations would remain significant and unavoidable, both individually and cumulatively. Therefore, this alternative's operational impact conclusion would be similar to, but slightly reduced, compared to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Hazards and Hazardous Materials

As discussed in Section 3.9, Hazards and Hazardous Materials, the proposed project would have no impact related to location on a list of hazardous materials sites and proximity to a public airport safety hazard. The proposed project's impacts related to routine transport, use, or disposal of hazardous materials, wildland fires, and cumulative impacts would be less than significant without mitigation. Proposed project impacts related to hazardous materials upset risk would be less than significant with incorporation of MM HAZ-2a through MM HAZ-2h; impacts related to hazardous emissions proximate to a school would be less than significant with implementation of MM HAZ-2a through MM HAZ-2h, as well as MM NOI-1a.

This alternative would be on the same SOI Expansion Area as the proposed project and, therefore, is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or within the vicinity of an airport or adopted aviation land use plan. Therefore, this alternative's impact conclusion for Impact HAZ-4 and Impact HAZ-5 would be similar to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Alternative 2 would require a similar level of demolition of existing on-site structures, as compared to the proposed project, for development of new residential units under this alternative, even though it would be at a reduced density. Because of the age of existing structures in the Master Plan Area, there is potential for the presence of hazardous materials, such as ACM or LBP. Construction materials and equipment would also be transported during construction activities. This alternative would have the potential to transport, dispose of, and risk upset of potentially hazardous materials. As such, this alternative would be required to implement MM HAZ-2c, which specifies that all construction or demolition activities comply with California Occupational Safety and Health Administration (Cal/OSHA) asbestos and lead worker construction standards and off-site disposal requirements. Further, project construction would occur proximal to schools. As such, implementation of MM HAZ-2a through MM HAZ-2c would reduce potential impacts from hazardous materials during construction on schools. Additionally, this alternative would implement MM NOI-1a, which requires that construction staging areas are located at the greatest feasible distance from sensitive receptors. Thus, with implementation of the applicable mitigation measures, construction-related impacts on hazards, and hazardous materials would be less than significant.

Under Alternative 2, the Master Plan Area would be developed with 854 residential units, which is a reduction from the proposed project. These uses are not anticipated to involve the routine use, storage, or disposal of hazardous materials. Moreover, the Master Plan Area is relatively flat and is not located within a VHFHSZ by CAL FIRE. This alternative would be subject to applicable policies and regulations within the Fresno County Hazard Mitigation Plan and would not impair the Big Dry Creek Dam Emergency Action Plan (EAP). Additionally, all major roads would be available for evacuation, depending on the location and type of emergency that arises. This alternative would not include any actions that would impair or physically interfere with any of Fresno County's emergency plans or evacuation routes. As such, impacts related to operational hazards would be less than significant. Therefore, all other impact conclusions related to hazards and hazardous materials for this

alternative would be similar, but slightly reduced, compared to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Hydrology and Water Quality

As noted in Section 3.10, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge, risk of pollutant release from site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site with implementation of MM HYD-4, and cumulative impacts would be less than significant without mitigation.

This alternative would be on the same Master Plan Area as the proposed project. Portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. Thus, impacts related to the risk of pollutant release from Master Plan Area inundation would be less than significant without mitigation. Since this alternative is located on the same Master Plan Area as the proposed project, impact conclusions related to risk of pollutant release from Master Plan Area inundation and flooding would be similar to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Alternative 2 would require construction of approximately 854 residential units on the Master Plan Area. Although it would introduce fewer impervious surfaces than the proposed project because of reduced building and pavement coverage, Alternative 2 would still be required to implement site-specific BMPs. These include preparing a Storm Water Pollution Prevention Plan (SWPPP) under the Construction General Permit and complying with the BMPs during construction and operation. Further, the existing on-site groundwater wells for domestic and agricultural uses would be closed under this alternative. Alternative 2 would not directly utilize groundwater, and it would create new connections to the City's existing water infrastructure. In addition, this alternative would include bioretention areas and would implement BMPs, in accordance with the SWPPP, to ensure runoff is directed to pervious areas where applicable. As such, this alternative is not anticipated to conflict with any SGMA regulations. These measures would ensure less than significant impacts related to erosion, runoff, drainage alterations, groundwater supply and recharge, and water quality with the implementation of MM HYD-4. Therefore, all other impact conclusions related to hydrology and water quality for this alternative be similar to, but slightly reduced, compared to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Land Use

As noted in Section 3.11, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

Under Alternative 2, the Master Plan Area would be annexed into the City and developed pursuant to a General Plan Amendment and associated rezoning, similar to the proposed project. As such, Alternative 2 would not introduce land uses that are incompatible with surrounding development or physically divide an established community. However, compared to the proposed project, the substantially reduced residential density under Alternative 2 would be less supportive of several adopted General Plan land use objectives and policy directions. The General Plan's Land Use Element emphasizes compact development patterns, efficient use of urban land and infrastructure, and residential growth at intensities that support walkability, reduced vehicle trip lengths, and a complete community. By accommodating significantly fewer residential units across the same Master Plan Area, Alternative 2 would underutilize land planned for urban development, reduce opportunities for housing proximate to services and amenities, and limit the effectiveness of compact neighborhood design envisioned in the General Plan. Nevertheless, this reduced level of policy support would not result in a physical land use conflict or a significant environmental impact under the City's adopted thresholds. Therefore, land use and planning impacts for this alternative would remain less than significant. Therefore, this alternative's impact conclusion would be similar, but slightly increased, compared to the conclusion reached in Section 3.11, Land Use and Planning.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.1.1, Mineral Resources, the proposed project would have no project-level or cumulative impacts related to mineral resources. Since this alternative would remain on the same Master Plan Area as the proposed project and no mineral resources were identified within or adjacent to the Master Plan Area, there would be no impact to mineral resources. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 4.1.1, Mineral Resources.

Noise

As noted in Section 3.12, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The proposed project would have a less than significant impact related to substantial noise increase in excess of standards with incorporation of MM NOI-1a and MM NOI-1b; impacts related to groundborne vibration and noise levels would be less than significant with implementation of MM NOI-2. Cumulative impacts would be less than significant without mitigation.

Construction

Like the proposed project, Alternative 2 would include construction activities, such as demolition, equipment uses, material transport, and worker commutes, and would generate both direct and indirect noise impacts. This could result in construction-related noise impacts. Because of the reduced number of residential units, construction would likely require fewer resources and a shorter timeline, resulting in an overall reduced construction noise duration compared to the proposed project. However, the required construction equipment would be similar and still result in increases to ambient noise and vibration, especially in relation to existing structures. As such, MM NOI-1a and MM NOI-2 would still be required to reduce impacts from construction-related noise to a less than

significant level. Therefore, this alternative's impact conclusion for construction-related noise would be similar, but slightly reduced, compared to the conclusion reached in Section 3.12, Noise.

Operation

Operationally, Alternative 2 would generate fewer daily vehicle trips than the proposed project because of the reduced number of residential units. This would result in lower mobile source noise. Stationary sources, such as heating, ventilation, and air conditioning (HVAC) systems, would also be similar or slightly reduced and remain below noise thresholds. However, this alternative would still generate operational noise that could result in excessive noise levels. MM NOI-1b would require the preparation of a stationary source noise reduction plan to identify appropriate design measures, where required, and would ensure that stationary source operational noise impacts generated by future development projects would be reduced to the greatest extent feasible. With the implementation of MM NOI-1b, operational noise impacts would be less than significant. Additionally, the Master Plan Area is not within 2 miles of a public or private airport, so no airport-related noise impacts would occur. Therefore, this alternative's impact conclusion for construction-related noise would be similar, but slightly reduced, compared to the conclusion reached in Section 3.12, Noise.

Population and Housing

As noted in Section 3.13, Population and Housing, with respect to population growth, housing displacement, and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Alternative 2 would construct 854 residential units. Using the most recent California Department of Finance (CDF) estimate for the average number of persons per household in the City of 2.81, the addition of 854 housing units could increase the population of the City by an estimated 2,400 persons. Based on Fresno Council of Governments' (COG's) projections for the City, the population is anticipated to be 142,490 in 2035 and 157,380 in 2060. As such, the anticipated increase of 2,400 persons resulting from this alternative would result in approximately 1.7 percent of the City's forecasted growth in 2035 and approximately 1.5 percent of the City's forecasted growth in 2060. Growth related to Alternative 2 has already been factored into anticipated and forecasted growth within the City, and the relatively small portion of growth resulting from implementation of this alternative would not result in substantial unplanned growth in the City. Thus, this alternative would have a less than significant impact related to population growth.

The Master Plan Area does contain approximately 8 residential units. Because of the decreased development density, Alternative 2 would require demolition of approximately 4 of the 8 existing residential units. As such, this alternative would have the potential to displace existing housing. However, Alternative 2 would include the construction of approximately 854 new residential units. Thus, this alternative would not displace substantial numbers of people or existing housing and would provide 854 residential units in their place. In this regard, Alternative 2's impact related to housing displacement would be less than significant. Therefore, this alternative's impact conclusion would be similar, but slightly reduced, compared to the conclusion reached in Section 3.13, Population and Housing.

Public Services

As noted in Section 3.14, Public Services, the proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, park and recreation facilities, and cumulative impacts.

Alternative 2 would increase the permanent population of the Master Plan Area. Thus, this alternative would increase the demand for public services. However, the population under Alternative 2 would be approximately 2,400 residents compared to the proposed project's approximately 9,234 residents. As such, the demand for public services during construction and operation would be reduced compared to the proposed project. All development under this alternative would be required to comply with applicable provisions of the California Building Code (CBC) and California Fire Code. Since Alternative 2 would be constructed at a lower density and would have fewer residents occupying the Master Plan Area, impacts on public services and recreation would be less than significant. Therefore, this alternative's impact conclusion would be reduced compared to the conclusion reached in Section 3.14, Public Services.

Recreation

As noted in Section 3.15, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Alternative 2 would develop residential units and, in turn, would result in an increase in population for the City. As such, this alternative would potentially increase demands for recreational facilities. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. In accordance with the CMC, fees are deposited in specific funds that shall be used solely for the acquisition, improvement, and expansion of public parks and recreation facilities as outlined in the park acquisition and improvement fee update. Alternative 2 would be subject to the development fee for parks and recreation facilities. In addition, this alternative would include recreational facilities in the form of parks, trails, and preserved open space. Further, Alternative 2 would be constructed at a lower density and would have fewer residents occupying the Master Plan Area than the proposed project. Thus, with the provision of recreational facilities and payment of development fees, this alternative would have a less than significant impact related to recreation. Therefore, this alternative's impact conclusion would be similar, but slightly reduced, compared to the conclusion reached in Section 3.15, Recreation.

Transportation

As noted in Section 3.16, Transportation, the proposed project's impacts related to bicycle, pedestrian, and transit facility circulation would be less than significant without mitigation. The proposed project's impact related to roadway safety hazards would be less than significant with incorporation of MM TRANS-3a through MM TRANS-3f; impacts related to emergency access would

be less than significant with implementation of MM TRANS-4. The proposed project's impacts related to VMT, and cumulative impacts, would be significant and unavoidable.

As mentioned in Section 3.15, Transportation, the proposed project would generate a total of approximately 43,801 daily trips. Alternative 2 would construct approximately 854 residential units, compared to the proposed project's 3,286 residential units. As such, Alternative 2 would result in a lower number of individuals who would reside in the Master Plan Area and a decreased residential density. A decrease in residential density is linked to an increase in VMT as residents travel farther in their vehicles to access other land uses.[1] Therefore, this alternative may result in an increased impact related to VMT. As such, this alternative would have a significant and unavoidable impact related to VMT. Therefore, this alternative's VMT impact conclusion would be similar, but increased, compared to the conclusion reached in Section 3.16, Transportation.

Potential transportation hazards could arise from poor design, incompatible uses, or inadequate emergency access. However, Alternative 2 would be required to follow circulation design standards in the General Plan and comply with California Fire Code requirements for emergency access. These measures would ensure impacts remain less than significant. Therefore, this alternative's impact conclusion would be similar, but reduced, compared to the conclusion reached in Section 3.16, Transportation.

Utilities and Service Systems

As noted in Section 3.17, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Alternative 2 would develop 854 residential units on the same Master Plan Area as the proposed project. This would have the potential to increase demand for utilities and service systems. The Master Plan Area is currently served by existing utility and service system providers, including water, wastewater treatment, and solid waste disposal. Alternative 2 would increase the permanent population of the Master Plan Area to approximately 2,400 residents, which would be lower than the projected 9,234 residents. This alternative would include the construction of new water and wastewater supply infrastructure. As previously mentioned in Section 3.17, Utilities and Service Systems, water, wastewater, recycled water, and solid waste providers would have adequate capacity to serve the proposed project. Since Alternative 2 would have a decrease in the number of residents occupying the Master Plan Area compared to the proposed project and utility service providers would have enough capacity and supply to serve Alternative 2, impacts would be less than significant.

[1] California Air Resources Board (ARB). Residential Density. 2025. Website: https://ww2.arb.ca.gov/sites/default/files/2025-05/Residential%20Density%20-%202025%20Policy%20Brief.pdf. Accessed November 11, 2025

Therefore, this alternative's impact conclusion would be similar, but slightly reduced, compared to the conclusion reached in Section 3.17, Utilities and Service Systems.

Wildfire

As noted in Section 3.18, Wildfire, the proposed project's impact related to wildfire would be less than significant without mitigation.

Alternative 2 would be located on the same Master Plan Area as the proposed project. This alternative would develop new structures, including residential units, and infrastructure within the Master Plan Area. The Master Plan Area is relatively flat and is not located within a VHFHSZ by CAL FIRE. According to FEMA, the Master Plan Area is located within Flood Hazard Zone X, an area determined to be outside the 0.2 percent (500-year) annual chance floodplain. Additionally, portions of the Master Plan Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. Moreover, development under this alternative would abide by emergency access and fire safety standards established in the California Fire Code and CBC. As such, wildfire impacts would be less than significant. Therefore, because of the decreased development intensity, this alternative's impact conclusions would be similar, but slightly reduced, compared to the conclusion reached in Section 3.18, Wildfire.

6.4.2 - Conclusion

Under Alternative 2, construction and ground-disturbing activities would occur for the development of approximately 854 residential units on the Master Plan Area. This would be a reduction in the 3,286 residential units from the proposed project. As a result of this decreased density and development intensity, Alternative 2 would have similar impacts associated with aesthetics, light, and glare; agriculture and forestry resources; air quality; biological resources; cultural resources and TCRs; energy; geology, soils, and seismicity; GHG emissions; hazards and hazardous materials; hydrology and water quality; noise; population and housing; public services; recreation; utilities and service systems; and wildfire, when compared to the proposed project. Alternative 2 would have similar, but slightly increased, impacts related to land use and planning when compared to the proposed project. Notably, this alternative would not completely avoid the implementation of mitigation measures identified for the proposed project. Furthermore, this alternative would not avoid the proposed project's significant and unavoidable impact related to VMT. Rather, the reduction in residential density would have the potential to increase VMT generated in the Master Plan Area.

Alternative 2 would not fully meet the proposed project's objectives discussed in Section 6.2 above. This alternative would include the expansion of the City's SOI, establishment of a master plan for the Master Plan Area, provision of new infrastructure, and establishment of safe and secure neighborhood designs. However, while this alternative would develop residential units to provide residential housing opportunities and to assist in meeting regional housing demand, the Master Plan Area would not be developed to the fullest extent practicable to fully meet these objectives. With fewer units and lower density, there would be less variety in housing types, sizes, and affordability.

Additionally, because Alternative 2 would develop substantially fewer residential units across the same Master Plan Area, residential uses and activity centers would be more dispersed. This reduced development intensity would limit the number of residents and destinations within convenient walking distances of one another. As a result, the pedestrian network would not be as strong, with fewer opportunities for walkability and connectivity between neighborhoods, amenities, and urban services. The decreased density would also result in some residential units not being built as proximate to urban services. Accordingly, Alternative 2 would not be as effective at meeting project objectives as the proposed project.

6.5 - Alternative 3—Increased Mixed-use Alternative

Under the Increased Mixed-use Alternative (Alternative 3), the proposed project would convert a portion of the proposed single-family homes into mixed-use development, including the addition of retail and commercial uses. Specifically, this alternative would increase the acreage of mixed-use development within the 507-acre Master Plan Area from 16 acres to 102 acres. This would result in approximately 20 percent of the Master Plan Area being defined as mixed-use development.

Alternative 3 would include the annexation of the Master Plan Area and the SOI expansion. Adoption of the MP and Vista Ranch Development would still occur, but approximately 86 acres of residential uses within the Master Plan Area would be converted to commercial and retail mixed-use compared to the proposed project. This alternative assumes that the mixed-use developments would be consistent with the standards and requirements for the Mixed Use Village Land Use designation and the C-1/MPC zoning district.

This alternative has been developed to address the significant and unavoidable VMT impact that would occur under the proposed project, specifically focusing on reducing VMT. The primary factors that contribute to the calculation of VMT include the location of the Master Plan Area and the types of uses proposed at the site. Therefore, a reduction in the density of residential uses on-site would not impact the VMT per capita. Numerous studies demonstrate that mixed-use development can impact VMT; however, the quantifiable extent to which it reduces VMT is inconclusive. Because mixed-use development offers a variety of employment, shopping, and recreational opportunities within short distances of residences, it facilitates the use of non-automobile travel modes and can also shorten car trips, which may in turn reduce overall VMT.

6.5.1 - Impact Analysis

Aesthetics, Light, and Glare

As noted in Section 3.1, Aesthetics, Light, and Glare, the proposed project would have no impact on scenic resources. The proposed project's impacts related to scenic vistas and existing visual character and quality of public views of the site and its surroundings, would be less than significant without mitigation. The proposed project's impacts related to new sources of light and glare would be less than significant with the implementation of MM AES-4, which provides project-specific nighttime lighting standards. Cumulative impacts would be less than significant without mitigation.

Alternative 3 would be located on the same SOI Expansion Area as the proposed project. As there are no officially designated State scenic highways or highways eligible for listing within or adjacent to the SOI Expansion Area, there would be no impact to scenic resources within an officially designated State scenic highway. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

This alternative would result in a similar development scale and, in turn, construction schedule as the proposed project. Construction activities, including demolition and grading, may temporarily and intermittently affect scenic views and visual character from distant panoramic viewpoints. Operationally, this alternative would still introduce new vertical structures. This development would change the scenic views and visual character in the project area, as well as introduce additional sources of light and glare compared to existing conditions on the Master Plan Area. However, development under this alternative would be required to be consistent with the General Plan and the Clovis Zoning Ordinance. Further, CMC Title 9, Development Code Division 3, includes a series of development and operational standards which are intended to minimize and mitigate the potential impacts of development within the City and promote compatibility with surrounding areas and land uses. These standards include requirements related to exterior light and glare (Section 9.22.050), fences, walls, and hedges (Section 9.24.060), height measurement and height limit exceptions (Section 9.24.080), screening and buffering (Section 9.24.090), setback regulations and exceptions (Section 9.24.100), landscaping standards (Chapter 9.28), tree protection standards (Chapter 9.30), and signs (Chapter 9.34). Consistency with General Plan and the Clovis Zoning Ordinance requirements would ensure this alternative would have a less than significant impact related to vistas and existing visual character and quality of public views of the site and its surroundings. This alternative would also be required to implement MM AES-4 to reduce potential impacts related to new sources of light and glare to less than significant levels. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.1, Aesthetics, Light, and Glare.

Agriculture and Forestry Resources

As noted in Section 3.2, Agriculture and Forestry Resources, the proposed project would have no impact related to the rezoning or loss of forest land. The proposed project would have a less than significant impact related to the conversion of farmland and other existing environmental changes resulting in the conversion of farmland or forest land. For the proposed project, impacts related to Williamson Act Contracts would be less than significant with the incorporation of MM AG-2. Cumulative impacts related to agricultural and forestry resources would be less than significant with the implementation of the aforementioned mitigation.

Alternative 3 would have the same development footprint as the proposed project. There are no identified forestry resources or timberland areas within the Master Plan Area. As such, development within the Master Plan Area under this alternative would not impact forestry resources.

The Master Plan Area contains areas zoned for agriculture, Farmland of Local Importance, and parcels within the Master Plan Area that are under Williamson Act Contracts. Since Master Plan Area rezoning and development would occur under this alternative, there would be conversions of existing designated farmland and conflicts with existing Williamson Act Contracts. A LESA Model was

prepared for the proposed project which encapsulates the same Master Plan Area as this alternative. This LESA Model complies with measures from the General Plan EIR for mitigation of farmland conversion impacts. Moreover, Alternative 3 would still require implementation of MM AG-2, which would ensure that the appropriate approvals are received under the "Williamson Act Cancellation Process, Guide for Local Governments" prior to any development. With completion of the LESA Model and incorporation of MM AG-2, this alternative would have a less than significant impact on conversion of farmland and conflicts with Williamson Act Contracts. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.2, Agriculture and Forestry Resources.

Air Quality

As noted in Section 3.3, Air Quality, impacts related to objectionable odors would be less than significant without mitigation. Proposed project impacts related to consistency with the applicable air quality management plan and cumulative criteria pollutant emissions would be less than significant with incorporation of MM AIR-1a through MM AIR-1d; impacts related to exposing sensitive receptors to pollutant concentrations would be less than significant with implementation of MM AIR-3. Cumulative impacts related to air quality for the proposed project would be less than significant with the aforementioned mitigation.

Construction

Construction of Alternative 3 would involve demolition, ground disturbance, and off-site transport of materials, potentially generating objectionable odors, criteria air pollutants, fugitive dust, and DPM. Given its similar development density, Alternative 3 would likely involve a similar duration of construction period as the proposed project. Odors from exhaust would be temporary and highly diffusive, resulting in a less than significant impact. In relation to the increase in criteria air pollutants, implementation of MM AIR-1a would require air quality emissions review for all applicable future development under this alternative to identify where further air pollution mitigation is appropriate. For fugitive dust and DPM, implementation of MM AIR-3 would require future development to conduct an HRA and identify any construction-related health risks above the established SJVAPCD thresholds. As such, with implementation of MM AIR-1a and MM AIR-3, construction-related air quality impacts would be reduced to a less than significant level. Therefore, this alternative would have similar construction-related air quality impact conclusions compared to the conclusions reached in Section 3.3, Air Quality.

Operation

Alternative 3 would generate similar types of criteria pollutants as the proposed project because of its similarity in development intensity. Accordingly, this alternative is anticipated to result in ROG and NO_X emissions above SJVAPCD thresholds. As such, this alternative would be required to implement MM AIR-1c to reduce ROG emissions and MM AIR-1d to reduce overall criteria pollutants by requiring the execution of a VERA with the SJVAPCD for mitigation of criteria pollutants ROG and NO_X. Further, implementation of MM AIR-1b would require air quality emissions review for all applicable future development under this alternative to identify where further air pollution mitigation during operation is appropriate. Moreover, this alternative would not include the operation of industrial or

waste-related uses, which are associated with objectionable odors. Thus, operational air quality impacts would be less than significant with the implementation of MM AIR-1b, MM AIR-1c, and MM AIR-1d. Therefore, this alternative would have similar operational air quality impact conclusions compared to the conclusions reached in Section 3.3, Air Quality.

Biological Resources

As discussed in Section 3.4, Biological Resources, the proposed project would have no impact with respect to conflicts with an adopted local, regional, or State HCP. With respect to special-status species and other wildlife, impacts vary by project component and species group, including no impacts in the SOI Expansion and Non-development Area, and less than significant impacts with mitigation incorporated for development within MP Area 1 and MP Area 2. Impacts related to sensitive natural communities and wetlands and other jurisdictional features would be less than significant with mitigation incorporated, reflecting both direct and indirect effects of development. Impacts related to fish and wildlife movement corridors and nursery sites would likewise be less than significant with mitigation incorporated. Impacts related to conflicts with local biological resource policies or ordinances would be less than significant. Cumulative biological resources impacts would also be less than cumulatively considerable with implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c. There would be no impacts related to the SOI Expansion and Non-development Area.

The SOI Expansion Area is not located within an approved HCP. As such, Alternative 3 would have no impact on an approved HCP. Therefore, this alternative's impact conclusions related to approved HCPs would be the same as the conclusion reached in Section 3.4, Biological Resources.

Development of Alternative 3 would include demolition, ground disturbance, and removal of vegetation, as well as new structures within the Master Plan Area which would have the potential to impact biological resources. The Master Plan Area contains special-status species, habitat for special-status species, nursery sites, and wetlands, as well as the potential for wildlife movement corridors. As such, implementation of MM BIO-1a through MM BIO-1o, MM BIO-2, and MM BIO-3a through MM BIO-3c would be required to achieve less than significant impacts related to biological resources because of Master Plan Area development. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.4, Biological Resources.

Cultural Resources

As noted in Section 3.5, Cultural Resources and Tribal Cultural Resources, the proposed project would have a less than significant impact related to historical resources, archaeological resources, human remains, and TCRs with implementation of MM CUL-1a and MM CUL-1b. Cumulative impacts related to cultural resources and TCRs were determined to be less than significant without mitigation.

Alternative 3 would have the same development footprint as the proposed project. Construction of this alternative would include ground-disturbing activities throughout the Master Plan Area. As such, Alternative 3 would have the potential to encounter historical resources archaeological resources, human remains, or TCRs. With implementation of MM CUL-1a and MM CUL-1b, this alternative's

impacts on cultural resources and TCRs would be reduced to a less than significant level. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.5, Cultural Resources and Tribal Cultural Resources.

Energy

As noted in Section 3.6, Energy, the proposed project's impacts related to energy would be less than significant impact without mitigation. Alternative 3 would involve energy usage during construction. Construction activities would include demolition, grading, and equipment transport, which would rely primarily on petroleum-based fuels. The construction activities would be temporary, and the overall construction schedule and process would be designed to be efficient to avoid excess monetary costs, as it would be reasonable to assume that contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. For example, equipment and fuel are not typically used wastefully given the added expense associated with renting, maintaining, and fueling the equipment. As such, this alternative's construction-related energy impacts would be less than significant.

Further, as this alternative is on the same SOI Expansion Area as the proposed project, it would be served by the same energy provider, PG&E. PG&E has sufficient generation and procurement capacity to meet this demand within the region. According to PG&E's 2022 Integrated Resource Plan and recent filings with the California Energy Commission (CEC), the utility is actively expanding its renewable and grid capacity, including battery storage and distributed solar projects. Further, this alternative would be subject to all applicable State and local energy-efficient standards. Alternative 3 would have a similar development intensity as the proposed project and, in turn, similar operational energy demand. Thus, this alternative would have a less than significant operational impact related to energy. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.6, Energy.

Geology, Soils, and Seismicity

As noted in Section 3.7, Geology, Soils, and Seismicity, the proposed project would have no impact related to septic tanks or alternative wastewater disposal systems. Impacts related to unstable surface conditions would be less than significant without mitigation. The proposed project's impacts related to the risk of loss, injury, or death involving seismic hazards, as well as soil erosion or loss of topsoil, expansive soil, and paleontological resources, would be less than significant with the incorporation of MM GEO-1a, MM GEO-1b, and MM GEO-6. The proposed project's cumulative impact would be less than significant without mitigation.

Alternative 3 would be constructed on the same SOI Expansion Area as the proposed project and would have a similar development footprint. Like the proposed project, construction would involve ground-disturbing activities that could increase soil erosion and disturb potential paleontological resources. However, compliance with the Construction General Permit and implementation of BMPs would reduce erosion and topsoil loss, and implementation of MM GEO-6 would outline the appropriate course of action if paleontological resources are discovered during construction of this alternative.

Moreover, given the proximity of active faults in relation to the SOI Expansion Area, this alternative would still require implementation of MM GEO-1a to ensure that geotechnical investigations would be conducted prior to development of new structures and MM GEO-1b to ensure that the area on the Master Plan Area already studied under a geotechnical investigation would include the applicable engineering recommendations for future development. No unstable soils were identified on the Master Plan Area by the previously prepared geotechnical investigation. Furthermore, Alternative 3 would not include the construction of any new septic tanks. Thus, with the implementation of MM GEO-1a, MM GEO-1b, and MM GEO-6, this alternative would have a less than significant impact related to geology, soils, and seismicity. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.7, Geology, Soils, and Seismicity.

Greenhouse Gas Emissions

As noted in Section 3.8, Greenhouse Gas Emissions, the proposed project would have a less than significant impact related to GHG emissions with the incorporation of MM GHG-1a through MM GHG-1e. However, MP Area 2 would result in a significant and unavoidable impact, both at the project-level and cumulatively, related to conflicting with an adopted GHG-reducing plan.

Construction

Alternative 3 would have a similar development intensity as the proposed project. As such, the construction timeline and phases for this alternative are assumed to be similar to that of the proposed project. Construction activities, such as demolition, equipment use, material transport, and worker commutes, would generate both direct and indirect GHG emissions that could cause significant impacts. As such, this alternative would require the incorporation of MM GHG-1a, which would implement construction BMPs aimed at reducing emissions during equipment idling and the use of modern construction equipment. Further, GHG emissions associated with the development of the proposed project would occur over the short term from construction activities. Therefore, with the implementation of MM GHG-1a, GHG emissions associated with the construction of Alternative 3 would not be substantial and would not conflict with any GHG plans or policies. Impacts would be less than significant. Therefore, this alternative's construction-related impact conclusions would be similar to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Operation

Operational emissions for this alternative would result from vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal. Throughout the buildout period and on an ongoing, long-term basis, this alternative could generate GHG emissions that could have a significant impact on the environment. In order to reduce these impacts, Alternative 3 would need to implement MM GHG-1b through MM GHG-1e, which would restrict natural gas usage, implement all-electric landscaping equipment, require EV charging infrastructure to be developed, and unbundle parking costs. This alternative would also comply with applicable green building standards, the CMC, and CALGreen.

However, even with mitigation, the speculative nature of future development in MP Area 2, including unknown buildout timing, project size, and intensity, prevents a definitive analysis of consistency with

applicable GHG-reducing plans. As such, GHG impacts from Alternative 3 operations would remain significant and unavoidable, both individually and cumulatively. Therefore, this alternative's operational impact conclusion would be similar to the conclusion reached in Section 3.8, Greenhouse Gas Emissions.

Hazards and Hazardous Materials

As discussed in Section 3.9, Hazards and Hazardous Materials, the proposed project would have no impact related to location on a list of hazardous materials sites or proximity to a public airport safety hazard. The proposed project's impacts related to routine transport, use, or disposal of hazardous materials, wildland fires, and cumulative impacts would be less than significant without mitigation. Proposed project impacts related to hazardous materials upset risk would be less than significant with the incorporation of MM HAZ-2a through MM HAZ-2h; impacts related to hazardous emissions proximate to a school would be less than significant with the implementation of MM HAZ-2a through MM HAZ-2h, as well as MM NOI-1a.

This alternative would be on the same SOI Expansion Area as the proposed project. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 or within vicinity of an airport or adopted aviation land use plan. Therefore, this alternative's impact conclusion for Impact HAZ-4 and Impact HAZ-5 would be similar to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Alternative 3 would require the demolition of existing on-site structures for the development of new residential units. Because of the age of existing structures in the Master Plan Area, there is potential for the presence of hazardous materials, such as ACM or LBP. Construction materials and equipment would also be transported during construction activities. This alternative would have the potential to transport, dispose of, and risk upset of potentially hazardous materials. As such, this alternative would be required to implement MM HAZ-2c, which specifies that all construction or demolition activities comply with Cal/OSHA asbestos and lead worker construction standards and off-site disposal requirements. Further, project construction would occur proximal to schools. As such, implementation of MM HAZ-2a through MM HAZ-2c would reduce potential impacts from hazardous materials during construction on schools. Additionally, this alternative would implement MM NOI-1a, which requires that construction staging areas be located at the greatest feasible distance from sensitive receptors. Thus, with the implementation of the applicable mitigation measures, construction-related impacts on hazards and hazardous materials would be less than significant.

This alternative would result in a similar development footprint as the proposed project. Alternative 3 would increase the amount of mixed-use commercial/retail development on the Master Plan Area. The commercial uses may require the use and/or storage of common household hazardous materials, including paints, insecticides, detergents, cleaners, and cleaning solvents. However, these uses would be required to comply with the applicable laws and regulations regarding storage and handling. Moreover, the SOI Expansion Area is relatively flat and is not located within a VHFHSZ by CAL FIRE. This alternative would be subject to applicable policies and regulations within the Fresno County Hazard Mitigation Plan and would not impair the Big Dry Creek Dam EAP. Additionally, all major roads would be available for evacuation, depending on the location and type of emergency that

arises. This alternative would not include any actions that would impair or physically interfere with any of Fresno County's emergency plans or evacuation routes. As such, impacts related to operational hazards would be less than significant. Therefore, all other impact conclusions related to hazards and hazardous materials for this alternative would be similar to the conclusion reached in Section 3.9, Hazards and Hazardous Materials.

Hydrology and Water Quality

As noted in Section 3.10, Hydrology and Water Quality, the proposed project's impacts related to surface and groundwater quality during construction and operation, groundwater supply/recharge, risk of pollutant release from site inundation, water quality control or sustainable groundwater management plans consistency, erosion/siltation, additional sources of polluted runoff, exceedance of storm drainage capacity resulting in flooding, and impedance of flood flows from alterations to the existing drainage pattern of the site with implementation of MM HYD-4, and cumulative impacts would be less than significant without mitigation.

This alternative would be on the same SOI Expansion Area as the proposed project. Portions of the SOI Expansion Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. Thus, impacts related to risk of pollutant release from SOI Expansion Area inundation would be less than significant without mitigation. Since this alternative is located on the same SOI Expansion Area as the proposed project, impact conclusions related to risk of pollutant release from site inundation and flooding would be similar to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Alternative 3 would include a similar development footprint as the proposed project and would introduce similar amounts of impervious surface that could impact hydrology and water quality. This alternative would still be required to prepare a SWPPP under the Construction General Permit, which would require implementation of BMPs to control erosion and the loss of topsoil to the extent practicable. Further, the existing on-site groundwater wells for domestic and agricultural uses would be closed under this alternative. Alternative 3 would not directly utilize groundwater, and it would create new connections to the City's existing water infrastructure. In addition, this alternative would include bioretention areas and would implement BMPs, in accordance with the SWPPP, to ensure runoff is directed to pervious areas where applicable. As such, this alternative is not anticipated to conflict with any SGMA regulations. Implementation of BMPs and MM HYD-4 would ensure less than significant impacts related to erosion, runoff, drainage alterations, groundwater supply and recharge, and water quality. Therefore, all other impact conclusions related to hydrology and water quality for this alternative be similar to the conclusion reached in Section 3.10, Hydrology and Water Quality.

Land Use and Planning

As noted in Section 3.11, Land Use and Planning, the proposed project's impacts related to physically dividing an established community, conflicting with applicable plans, policies, or regulations adopted

for the purpose of avoiding or mitigating an environmental effect, and cumulative impacts would be less than significant without mitigation.

The SOI Expansion Area is largely undeveloped. Alternative 3 would include annexation of the SOI Expansion Area, a General Plan Amendment, and associated rezoning to accommodate the proposed development intensity. Under this alternative, development would be designed to be consistent with the proposed land use designations and zoning districts. Further, this alternative would not involve construction of any type of linear feature that would impair mobility within an existing community, nor would it remove a means of access in a manner that would impede travel or otherwise constitute division of an established community. Rather, this alternative would provide roadways and pedestrian pathways to connect development to the existing circulation system and to improve existing access within the SOI Expansion Area. Thus, land use and planning impacts for this alternative would be less than significant. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.11, Land Use and Planning.

Mineral Resources

As noted in Chapter 4, Effects Found not to be Significant, Section 4.1.1, Mineral Resources, the proposed project would have no project-level or cumulative impacts related to mineral resources. Since this alternative would remain on the same SOI Expansion Area as the proposed project and no mineral resources were identified within or adjacent to the SOI Expansion Area, there would be no impact to mineral resources. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 4.1.1, Mineral Resources.

Noise

As noted in Section 3.12, Noise, the proposed project would have no impact related to exposing people to excessive noise levels within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The proposed project would have a less than significant impact related to substantial noise increase in excess of standards with incorporation of MM NOI-1a and MM NOI-1b; impacts related to groundborne vibration and noise levels would be less than significant with implementation of MM NOI-2. Cumulative impacts would be less than significant without mitigation.

Construction

Like the proposed project, Alternative 3 would include construction activities, such as demolition, equipment uses, material transport, and worker commutes, that would generate both direct and indirect temporary noise impacts. Because of similar development intensity as the proposed project, this alternative assumes similar modeled noise and vibration emissions along with the construction timeline. As such, implementation of MM NOI-1a and MM NOI-2 would still be required to reduce impacts from construction-related noise to a less than significant level. Therefore, this alternative's impact conclusion for construction-related noise would be similar, compared to the conclusion reached in Section 3.12, Noise.

Operation

Operationally, Alternative 3 would generate daily vehicle trips that would result in mobile source noise. Stationary sources, such as HVAC systems, would also occur as a result of this alternative. Thus, this alternative would still generate operational noise that could result in excessive noise levels. The development intensity for Alternative 3 would be similar to the proposed project. MM NOI-1b would require the preparation of a stationary source noise reduction plan to identify appropriate design measures, where required, and would ensure that stationary source operational noise impacts generated by future development projects would be reduced to the greatest extent feasible. With implementation of MM NOI-1b, operational noise impacts would be less than significant. Additionally, the SOI Expansion Area is not within 2 miles of a public or private airport, so no airport-related noise impacts would occur. Therefore, this alternative's impact conclusion for construction-related noise would be similar to the conclusion reached in Section 3.12, Noise.

Population and Housing

As noted in Section 3.13, Population and Housing, with respect to population growth, housing displacement, and cumulative impacts, the proposed project would have a less than significant impact without mitigation.

Alternative 3 would increase mixed-use development on the project site by approximately 17 percent. It is assumed that the 17 percent increase in mixed-use development would be gained by removing approximately 17 percent of the proposed project's residential units. Thus, this alternative would develop approximately 2,727 residential units. Further, the Master Plan Area does contain approximately 8 residential units. Given that the development footprint would be similar to the proposed project, Alternative 3 would require demolition of all existing residential units. As such, this alternative would have the potential to displace existing housing. However, Alternative 3 would include the construction of approximately 2,727 new residential units. Thus, this alternative would not displace substantial numbers of people or existing housing and would provide 2,727 residential units in their place. In this regard, Alternative 3's impact related to housing displacement would be less than significant.

Using the most recent CDF estimate, 2.81, for the average number of persons per household in the City, the addition of 2,727 housing units could increase the population of the City by an estimated 7,663 persons. Based on Fresno COG's projections for the City, the population is anticipated to be 142,490 in 2035 and 157,380 in 2060. As such, the anticipated increase of 7,663 persons resulting from this alternative would equal approximately 5.4 percent of the City's forecasted growth in 2035 and approximately 4.9 percent of the City's forecasted growth in 2060. Growth related to Alternative 3 has already been factored into anticipated and forecasted growth within the City, and the relatively small portion of growth resulting from implementation of this alternative would not result in substantial unplanned growth in the City. Thus, this alternative would have a less than significant impact related to population growth. Therefore, this alternative's impact conclusion would be similar, but slightly reduced, compared to the conclusion reached in Section 3.13, Population and Housing.

Public Services

As noted in Section 3.14, Public Services, the proposed project would have a less than significant impact without mitigation in regard to fire protection facilities, police protection facilities, school facilities, library facilities, park and recreation facilities, and cumulative impacts.

Alternative 3 would result in the same development footprint and similar development intensity as the proposed project. This alternative would include construction of new residential units throughout the Master Plan Area. As such, this alternative would have the potential to increase demand for public services. All development under this alternative would be required to comply with applicable provisions of the CBC and California Fire Code. Additionally, the project applicant would be subject to the community facility development fee in accordance with CMC. Payment of these fees would contribute funding for increased staffing and resources related to public services. Thus, with payment of fees and adherence to applicable codes, this alternative would have a less than significant impact related to public servicers. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.14, Public Services.

Recreation

As noted in Section 3.15, Recreation, the proposed project would have a less than significant impact without mitigation regarding increased usage of existing parks and recreational facilities, the construction or expansion of recreational facilities, and cumulative impacts.

Alternative 3 would develop residential units and, in turn, would result in an increase in population for the City. As such, this alternative would potentially increase demands for recreational facilities. However, CMC Chapter 3.4, Park Acquisition and Development, states that any developer who plans for dwelling units to be constructed in the City shall pay, in addition to any other fees required to be paid by the City, a fee which shall be calculated on the basis of park acreage designated in the General Plan consisting of the estimated total land acquisition and construction cost distributed on the basis of the remaining developable area within the SOI. In accordance with the CMC, fees are deposited in specific funds that shall be used solely for the acquisition, improvement, and expansion of public parks and recreation facilities as outlined in the park acquisition and improvement fee update. Alternative 3 would be subject to the development fee for parks and recreation facilities. In addition, this alternative would include recreational facilities in the form of parks, trails, and preserved open space. Thus, with the provision of recreational facilities and payment of development fees, this alternative would have a less than significant impact related to recreation. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.15, Recreation.

Transportation

As noted in Section 3.16, Transportation, the proposed project's impacts related to bicycle, pedestrian, and transit facility circulation would be less than significant without mitigation. The proposed project's impact related to roadway safety hazards would be less than significant with the incorporation of MM TRANS-3a through MM TRANS-3f; impacts related to emergency access would be less than significant with the implementation of MM TRANS-4. The proposed project's impacts related to VMT, and cumulative impacts, would be significant and unavoidable.

As mentioned in Section 3.16, Transportation, the proposed project would generate a total of approximately 43,801 daily trips. Because of the increase in retail/commercial use, Alternative 3 would be anticipated to have slightly increased trip generation levels.[2] Although numerous studies demonstrate that mixed-use development can impact VMT, the quantifiable extent to which it reduces VMT is inconclusive. Because mixed-use developments offer a variety of employment, shopping, and recreational opportunities within short distances of residences, they facilitate the use of non-automobile travel modes and can also shorten car trips, which may in turn reduce passenger vehicle GHG emissions.[3] According to a 2024 analysis conducted by UC Davis, which analyzed changes in travel behavior resulting from changes in land use patterns and the transportation system in specific case study areas, there was a downward trend in VMT, based on small samples. While the evidence suggests that mixed-use development can reduce VMT, it is not conclusive.[4] Alternative 3 could reduce project-specific and cumulative VMT impact associated with the proposed project because of the incorporation of additional mixed-use development that may encourage shorter trips and alternative modes of transportation. However, as studies are inconclusive on the extent to which mixed-use development may reduce per capita VMT, the level of per capita VMT reduction is unable to be quantified. Under Alternative 3, impacts would be reduced compared to the proposed project but, conservatively, would remain significant and unavoidable. Therefore, this alternative's VMT impact conclusion would be similar, but slightly reduced, to the conclusion reached in Section 3.16, Transportation.

Potential transportation hazards could arise from poor design, incompatible uses, or inadequate emergency access. However, Alternative 3 would be required to follow circulation design standards in the General Plan and comply with CFC requirements for emergency access. These measures would ensure impacts remain less than significant. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.16, Transportation.

Utilities and Service Systems

As noted in Section 3.17, Utilities and Service Systems, the proposed project's impacts related to water supply or conveyance facilities, wastewater treatment or conveyance facilities, stormwater drainage facilities, natural gas, electric power, telecommunications facilities, landfill capacity, consistency with solid waste regulations, and cumulative impacts would be less than significant without mitigation.

Alternative 3 would develop mixed-use development and residential units on the same Master Plan Area as the proposed project. This would permanently increase the City's population and would have the potential to increase demand for utilities and service systems. The Master Plan Area is currently

[2] Based on Institute of Transportation Engineers (ITE) Trip Generation Rates, single-family homes are 9.43 trips per unit, while retail/commercial land uses have a rate of 26.6 trips per employee.

[3] California Air Resources Board (ARB). 2014. Website: https://ww2.arb.ca.gov/sites/default/files/2020-06/Impacts_of_Land-Use_Mix_on_Passenger_Vehicle_Use_and_Greenhouse_Gas_Emissions_Policy_Brief_0.pdf. Accessed November 3, 2025.

[4] California Air Resources Board (ARB). 2014. Website: https://ww2.arb.ca.gov/sites/default/files/2024-02/Research%20Seminar%20Presentation%20Slides.pdf. Accessed November 3, 2025.

served by existing utility and service system providers, including water, wastewater treatment, and solid waste disposal. This alternative would include construction of new water and wastewater supply infrastructure. As previously mentioned in Section 3.17, Utilities and Service Systems, water, wastewater, recycled water, and solid waste providers would have adequate capacity to serve the proposed project. Since Alternative 3 would have a similar development intensity as the proposed project, and utility service providers would have enough capacity and supply to serve this alternative, impacts would be less than significant. Therefore, this alternative's impact conclusion would be similar to the conclusion reached in Section 3.17, Utilities and Service Systems.

Wildfire

As noted in Section 3.18, Wildfire, the proposed project's impact related to wildfires would be less than significant without mitigation.

Alternative 3 would be located on the same SOI Expansion Area as the proposed project. This alternative would develop new structures, including mixed-use and residential uses, and infrastructure within the Master Plan Area. The SOI Expansion Area is relatively flat and is not located within a VHFHSZ by CAL FIRE. According to FEMA, the Master Plan Area is located within Flood Hazard Zone X, an area determined to be outside the 0.2 percent [500-year] annual chance floodplain. Additionally, portions of the Master Plan Area are located within dam failure inundation areas associated with the Big Dry Creek Dam, as shown in Section 3.10, Hydrology and Water Quality, Exhibit 3.10-3. However, the Big Dry Creek Dam is under the oversight of DSOD. Regular inspection by DSOD and maintenance by the dam owners ensure that dams are kept in safe operating conditions. Moreover, development under this alternative would abide by emergency access and fire safety standards established in the CFC and CBC. As such, wildfire impacts would be less than significant. Therefore, this alternative's impact conclusions would be similar to the conclusion reached in Section 3.18, Wildfire.

6.5.2 - Conclusion

Under Alternative 3, construction and ground-disturbing activities would occur for the development of mixed-use and residential land uses within the Master Plan Area. Compared to the proposed project, this alternative would reduce the total number of residential units to accommodate an increased amount of commercial and retail development, resulting in approximately 20 percent of the Master Plan Area being designated for mixed-use uses.

While the reduction in residential units would limit the overall number of new housing opportunities provided relative to the proposed project, Alternative 3 would introduce a greater mix of land uses that could improve the balance between jobs and housing within the Master Plan Area. By increasing opportunities for employment, retail, and services closer to where residents would live, this alternative could reduce the need for longer vehicle trips for daily needs and support shorter internal trips within the project area. Although available research suggests that mixed-use development has the potential to support reduced vehicle trip lengths and increased use of non-automobile travel modes, the extent to which these changes would result in a measurable reduction in per-capita VMT cannot be quantified with certainty. Accordingly, while Alternative 3 could incrementally improve jobs–housing

proximity and internal trip capture compared to the proposed project, it would not be sufficient to reduce the project's VMT impacts to a less than significant level, and VMT impacts would remain significant and unavoidable.

Because of the similar development footprint and scale, Alternative 3 would have similar impacts associated with aesthetics, light, and glare; agriculture and forestry resources; air quality; biological resources; cultural resources and TCRs; energy; geology, soils, and seismicity; GHG emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; utilities and service systems; and wildfire, when compared to the proposed project. Notably, this alternative would require implementation of the same mitigation measures identified for the proposed project.

Alternative 3 would not fully meet all of the proposed project's objectives discussed in Section 6.2 above to the same degree as the proposed project. This alternative would include the expansion of the City's SOI, establishment of a master plan for the Master Plan Area, establishment of a phasing plan for future development, provision of new infrastructure, development of a strong pedestrian network, development of residential uses proximate to urban services, enhancement of convenience and accessibility, and establishment of safe and secure neighborhood designs. However, this alternative would decrease the number of residential units to accommodate increased commercial and retail uses in mixed-use sites. This means fewer new homes would be built, limiting the City's ability to address local and regional housing needs. The reduction in residential units may also limit the diversity of housing types, sizes, and price points, making it more difficult to provide a full range of housing options for different household types and income levels. By allocating a larger share of the Master Plan Area to commercial and retail uses, this alternative does not maximize the residential development potential of the site, which could be important for efficient land use and smart growth principles. Thus, this alternative would not provide the optimal amount of residential housing opportunities and residences to help meet regional housing demand. Accordingly, this alternative would not fully satisfy all of the project objectives.

6.6 - Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the No Project Alternative" from among the project and the alternatives evaluated.

The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 6-1.

Table 6-1: Summary of Alternatives

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Section 3.1: Aesthetics, Lighting, and Glare				
Impact AES-1: Scenic vistas	LTS	NI <	LTS ≤	LTS =
Impact AES-2: Scenic resources	NI	NI =	NI =	NI =
Impact AES-3: Visual character or quality of public views	LTS	NI <	LTS ≤	LTS =
Impact AES-4: New source of light or glare	LTSM	LTS ≤	LTSM ≤	LTSM =
Cumulative Impacts	LTS	LTS <	LTS ≤	LTS =
Section 3.2: Agriculture and Forestry Resources				
Impact AG-1: Conversion of Farmland	LTS	NI <	LTS ≤	LTS =
Impact AG-2: Williamson Act contract	LTSM	NI <	LTSM ≤	LTSM =
Impact AG-3: Conflict/Cause rezoning of forest land	NI	NI =	NI =	NI =
Impact AG-4: Loss of forest land	NI	NI =	NI =	NI =
Impact AG-5: Other existing environmental changes resulting in conversion of farmland or forest land	LTS	NI <	LTS ≤	LTS =
Cumulative Impacts	LTSM	NI <	LTSM ≤	LTSM =
Section 3.3: Air Quality				
Impact AIR-1: Cumulative criteria pollutant emissions impacts	LTSM	NI <	LTSM ≤	LTSM =
Impact AIR-2: Consistency with Air Quality Management Plan	LTSM	LTS <	LTSM ≤	LTSM =
Impact AIR-3: Sensitive receptors exposure to pollutant concentrations	LTSM	LTS <	LTSM ≤	LTSM =
Impact AIR-4: Objectionable odors	LTS	LTS <	LTS ≤	LTS =
Cumulative Impacts	LTSM	LTS <	LTSM ≤	LTSM =
Section 3.4: Biological Resources				
Impact BIO-1: Special-status plant and wildlife species	LTSM	NI <	LTSM ≤	LTSM =

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Impact BIO-2: Sensitive natural communities or riparian habitat	LTSM	NI <	LTSM ≤	LTSM =
Impact BIO-3: Wetlands and jurisdictional features	LTSM	NI <	LTSM ≤	LTSM =
Impact BIO-4: Fish and wildlife movement corridors and nursery sites	LTSM	NI <	LTSM ≤	LTSM =
Impact BIO-5: Local policies or ordinances	LTSM	NI <	LTSM ≤	LTSM =
Impact BIO-6: Local, regional, or State Habitat Conservation Plan	NI	NI =	NI =	NI =
Cumulative Impacts	LTSM	NI <	LTSM ≤	LTSM =
Section 3.5: Cultural Resources and Tribal Cultural Resources				
Impact CUL-1: Historical resources	LTSM	NI <	LTSM ≤	LTSM =
Impact CUL-2: Archaeological resources	LTSM	NI <	LTSM ≤	LTSM =
Impact CUL-3: Human remains	LTSM	NI <	LTSM ≤	LTSM =
Impact TCR-1: Listed or eligible Tribal Cultural Resources	LTSM	NI <	LTSM ≤	LTSM =
Impact TCR-2: Lead Agency determined Tribal Cultural Resources	LTSM	NI <	LTSM ≤	LTSM =
Cumulative Impacts	LTS	NI <	LTS ≤	LTS =
Section 3.6: Energy				
Impact ENER-1: Wasteful, inefficient, or unnecessary consumption of energy resources	LTS	LTS ≤	LTS ≤	LTS ≤
Impact ENER-2: Conflict with or obstruct a State/local plan for renewable energy or energy efficiency.	LTS	LTS ≤	LTS ≤	LTS =
Cumulative impacts	LTS	LTS ≤	LTS ≤	LTS =
Section 3.7: Geology, Soils, and Seismicity				
Impact GEO-1: Seismic hazards	LTSM	NI <	LTSM ≤	LTSM =

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Impact GEO-2: Soil erosion or loss of topsoil	LTSM	NI <	LTSM ≤	LTSM =
Impact GEO-3: Unstable subsurface conditions	LTS	NI <	LTS ≤	LTS =
Impact GEO-4: Expansive soil	LTSM	NI <	LTSM ≤	LTSM =
Impact GEO-5: Septic tanks or alternative wastewater disposal system	NI	NI =	NI =	NI =
Impact GEO-6: Paleontological resources or unique geologic feature	LTSM	NI <	LTSM ≤	LTSM =
Cumulative Impacts	LTS	NI <	LTS ≤	LTS =
Section 3.8: Greenhouse Gas Emissions				
Impact GHG-1: Generation of GHG emissions	LTSM	LTS <	LTSM ≤	LTSM =
Impact GHG-2: Conflict with plan, policy, or regulation that reduces GHG emissions	SU	LTS <	SU ≤	SU =
Cumulative impacts	SU	LTS <	SU ≤	SU =
Section 3.9: Hazards and Hazardous Materials				
Impact HAZ-1: Routine transport, use, or disposal of hazardous materials	LTS	NI <	LTS ≤	LTS =
Impact HAZ-2: Upset and accident conditions involving release of hazardous materials	LTSM	NI <	LTSM ≤	LTSM =
Impact HAZ-3: Emit hazardous emissions or handle hazardous materials within 0.25 mile of a school	LTSM	NI <	LTSM ≤	LTSM =
Impact HAZ-4: Site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5	NI	NI =	NI =	NI =
Impact HAZ-5: Airport/aviation Safety	NI	NI =	NI =	NI =

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Impact HAZ-6: Interfere with an adopted emergency response or evacuation plan	LTS	NI <	LTS ≤	LTS =
Impact HAZ-7: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS ≤
Section 3.10: Hydrology and Water Quality				
Impact HYD-1: Surface and groundwater quality	LTS	NI <	LTS ≤	LTS =
Impact HYD-2: Groundwater supply/recharge	LTS	NI <	LTS ≤	LTS =
Impact HYD-3: Drainage leading to erosion/siltation, flooding, additional sources of polluted runoff, or impedance of flood flows	LTS	NI <	LTS =	LTS =
Impact HYD-4: Risk of pollutant release due to inundation	LTSM	LTS <	LTSM =	LTSM =
Impact HYD-5: Water quality control or sustainable groundwater management plans consistency	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Section 3.11: Land Use and Planning				
Impact LAND-1: Divide an established community	LTS	NI <	LTS ≤	LTS =
Impact LAND-2: Conflict with applicable plans, policies, or regulations	LTS	NI <	LTS ≥	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Chapter 4, Effects Found not to be Significant, Section 4.1.1: Mineral Resources				
Impact MIN-1: Loss of known valuable mineral resources	NI	NI =	NI =	NI =
Impact MIN-2: Loss of important mineral resource recovery sites	NI	NI =	NI =	NI =

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Cumulative impacts	NI	NI =	NI =	NI =
Section 3.12: Noise				
Impact NOI-1: Substantial noise increase in excess of standards	LTSM	LTS <	LTSM ≤	LTSM =
Impact NOI-2: Groundborne vibration/noise levels	LTSM	LTS <	LTSM ≤	LTSM =
Impact NOI-3: Excessive noise levels from airport activity	NI	NI =	NI =	NI =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Section 3.13: Population and Housing				
Impact POP-1: Population growth	LTS	NI <	LTS ≤	LTS =
Impact POP-2: Housing displacement/replacement housing	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Section 3.14: Public Services				
Impact PUB-1: Fire protection	LTS	NI <	LTS ≤	LTS =
Impact PUB-2: Police protection	LTS	NI <	LTS ≤	LTS =
Impact PUB-3: Schools	LTS	NI <	LTS ≤	LTS =
Impact PUB-4: Parks	LTS	NI <	LTS ≤	LTS =
Impact PUB-5: Libraries	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Section 3.15: Recreation				
Impact REC-1: Increase use of parks	LTS	NI <	LTS ≤	LTS =
Impact REC-2: Physical effect of recreational facilities on environment	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =
Section 3.16: Transportation				
Impact TRANS-1: Affect to circulation system	LTS	NI <	LTS ≤	LTS =

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative
Impact TRANS-2: Conflict with CEQA Guidelines Section 15064.3 Subdivision (b)	SU	LTS <	SU ≥	SU ≤
Impact TRANS-3: Hazards	LTSM	NI <	LTSM ≤	LTSM =
Impact TRANS-4: Emergency access	LTSM	NI <	LTSM ≤	LTSM =
Cumulative impacts	SU	LTS <	SU ≥	SU ≤
Section 3.17: Utilities and Service Systems				
Impact UTIL-1: New or expanded utility treatment facilities	LTS	LTS ≤	LTS ≤	LTS =
Impact UTIL-2: Water supplies	LTS	LTS ≤	LTS ≤	LTS =
Impact UTIL-3: Wastewater treatment capacity	LTS	LTS ≤	LTS ≤	LTS =
Impact UTIL-4: Attainment of solid waste reduction goals	LTS	LTS ≤	LTS ≤	LTS =
Impact UTIL-5: Solid waste regulations	LTS	LTS ≤	LTS ≤	LTS =
Cumulative impacts	LTS	LTS ≤	LTS ≤	LTS =
Section 3.18: Wildfire				
Impact WILD-1: Emergency response/evacuation plan consistency	LTS	NI <	LTS ≤	LTS =
Impact WILD-2: Expose project occupants to pollutant concentrations from wildfire	LTS	NI <	LTS ≤	LTS =
Impact WILD-3: Infrastructure that exacerbates wildfire risk	LTS	NI <	LTS ≤	LTS =
Impact WILD-4: Flooding and landslide hazards due to post-fire slope instability/drainage changes	LTS	NI <	LTS ≤	LTS =
Cumulative impacts	LTS	NI <	LTS ≤	LTS =

Notes:
NI = No impact
LTS = Less than significant impact
LTSM = Less than significant with mitigation incorporated
SU = significant and unavoidable impact

Environmental Topic Area	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Increased Mixed-use Alternative

< Impacts would be reduced compared to the proposed project.
≤ Impacts would be similar to, but slightly reduced, compared to the proposed project.
> Impacts would be greater than the proposed project.
≥ Impacts would be similar to, but slightly increased, compared to the proposed project.
= Impacts would be the same as the proposed project.
Source: FirstCarbon Solutions (FCS). 2025.

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an environmentally superior alternative. The No Project Alternative would have reduced impacts for a majority of categories. Thus, the No Project Alternative would be the environmentally superior alternative. Since the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

Alternative 2 would be the second environmentally superior alternative because it would slightly reduce impacts related to a majority of environmental resources, including air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, Tribal cultural resources, utilities and service systems, and wildfire because of the decreased development intensity. However, this alternative would not eliminate the significant and unavoidable impact related to VMT. Rather, the reduction in residential density would have the potential to increase VMT generated in the Master Plan Area. Furthermore, land use and planning impacts would also be slightly increased under this alternative, compared to the proposed project.

Additionally, Alternative 2 would also meet some of the proposed project objectives to a certain degree by expanding the SOI, establishing a master plan, providing new infrastructure, providing residential units, and encouraging neighborhood development on the Master Plan Area. However, , while this alternative would develop residential units to provide residential housing opportunities and to assist in meeting regional housing demand, the Master Plan Area would not be developed to the fullest extent practicable to fully meet these objectives. As such, the pedestrian network would not be as strong, and some residential units may not be built as proximate to urban services. Accordingly, Alternative 2 would not be as effective at meeting project objectives as the proposed project.

6.7 - Alternatives Rejected From Further Consideration

CEQA Guidelines Section 15126.6(c) requires an EIR to identify any alternatives that were considered but rejected as infeasible during the scoping process and explain the reasons for rejection of those alternatives. Factors that may be used to eliminate alternatives from detailed consideration include (i) failure to meet most of the basic project objectives, (ii) infeasibility taking into account economic, environmental, social, technological, and legal factors, or (iii) inability to substantially

lessen or avoid significant environmental impacts of the proposed project. The following alternatives were initially considered but rejected from further consideration for reasons described below.

Alternative Location Alternative

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the "key question" is whether any of the significant effects of the proposed project would be avoided or substantially lessened by relocating the proposed project. The CEQA Guidelines identify the following factors that may be taken into account when addressing the feasibility of an alternative location:

1. Site suitability
2. Economic viability
3. Availability of infrastructure
4. General Plan consistency
5. Other plans or regulatory limitations
6. Jurisdictional boundaries
7. Whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site.

An Alternative Location Alternative was considered for the proposed project. This alternative would have located the Master Plan Area on a different site than the current Master Plan Area. However, the project applicant does not own a similar acreage of land in another location, nor is there a better location in proximity to existing infrastructure, utilities, and City services. Moreover, an alternative project site would potentially not meet the project objectives of expanding the City's SOI or aligning with areas identified for growth by the City's General Plan. For these reasons, this alternative was deemed infeasible.

Increased Density Alternative

An Increased Density Alternative was considered for the proposed project to maximize housing opportunity on the Master Plan Area. Under this alternative, there would be upzoning throughout the Master Plan Area to higher densities to accommodate a 10 percent increase in residential units. The total unit count would increase from 3,286 under the proposed Master Plan to a total of 3,615 under this alternative. The increased unit count would be accommodated by decreasing lot sizes. The other components of the proposed project, including commercial, community recreational, and parks and recreation, would be identical under this alternative. The developable acreage would be identical to the proposed project. However, increased density would also increase demand for several environmental topic areas, such as energy, public services, utilities and service systems, transportation, and greenhouse gas emissions. Thus, this alternative was rejected as it would not reduce any potentially significant impacts from the proposed project.

SOI Expansion Area Reduction Alternative

Under the SOI Expansion Area Reduction Alternative, the proposed project would only expand the SOI and annex the proposed Master Plan Area, and it would exclude the 445-acre SOI expansion

outside of the proposed Master Plan. The components of the proposed project, including residential, commercial, community recreational, and parks and recreation, would be identical under this alternative. It is noted, however, that the reduction in the SOI would eliminate the possibility of the Non-development Area connecting to City services at some point in the future, if desired by those residents. This alternative would contain a similar development intensity and, in turn, would not avoid any potentially significant impacts identified as part of the proposed project. Further, this alternative would not fully meet the project objective related to expanding the City's SOI. For these reasons, this alternative was deemed infeasible.

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CHAPTER 7

7 - PERSONS AND ORGANIZATIONS CONSULTED/LIST OF PREPARERS

7.1 - Lead Agency

7.1.1 - City of Clovis

Clovis Fire Department

Fire Chief ..... Chris Ekk

Clovis Police Department

Police Captain, Division Commander ..... Iri Guerra
Management Analyst ..... Cori Nicholson

City of Clovis Public Utilities Department

Parks Manager ..... Timothy Breshears

7.1.2 - Public Agencies

Local Agencies

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Assistant Superintendent, Facility Services ..... Denver Stairs

Fresno County Public Library

Associate County Librarian ..... Terrence Eckman

7.2 - List of Preparers

7.2.1 - Lead Agency

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Vollmar Natural Lands Consulting

Principal in Charge ..... John Vollmar
Senior Ecologist ..... Eric Smith

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