

**DRAFT INITIAL STUDY AND
MITIGATED NEGATIVE DECLARATION**

**VESTING TENTATIVE SUBDIVISION
MAP NO. 6497 – WESTHAVEN 2 PROJECT
REEDLEY, CALIFORNIA**



AUGUST 2025



DRAFT INITIAL STUDY

VESTING TENTATIVE SUBDIVISION MAP No. 6497 – WESTHAVEN 2 PROJECT

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August 2025

NOTICE OF PUBLIC HEARING AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

This is to advise that the City of Reedley Community Development Division has prepared a Mitigated Negative Declaration for the Project identified below that is scheduled to be heard at the City of Reedley Planning Commission Meeting on Thursday, **October 16, 2025**.

PLEASE BE ADVISED that the City of Reedley will consider the Mitigated Negative Declaration at the Planning Commission meeting to be held on **October 16, 2025**. Presentations will be made at approximately 5:00 PM. Action on items on the Planning Commission agenda will occur after the presentations. The meeting will be held in the Reedley City Council Chambers located at 1717 9th Street, Reedley, CA 93654. The City of Reedley City Council will take final action to approve or deny a General Plan Amendment upon recommendation by the Planning Commission. A public hearing for the City Council shall be held at a later date.

Project Name

Vesting Tentative Subdivision Map No. 6497 - Westhaven 2 Project

Project Location

The proposed Project is located on an undeveloped 34-net-acre parcel within unincorporated Fresno County, immediately adjacent to the city of Reedley corporate limits (Assessor's Parcel Number [APN] 370-040-10). The Project site is generally bounded by future East North Avenue to the north, South Buttonwillow Avenue to the east, Rancho Vista residential subdivision to the south, and Buttonwillow Ditch to the west. The site is located within the Reedley, California, United States Geological Survey (USGS) 7.5-minute topographic map, Section 25, Township 15 South, Range 23 East, Mount Diablo Base and Meridian (MDB&M).

It is situated approximately nine miles northeast of State Route (SR) 99 and eight miles south of SR-180. Regional access to the Project site is available by SR-99 and SR-180. Local access to the Project site would be provided via South Buttonwillow Avenue and East North Avenue.

Project Description

The Project proposes the development of 166 single-family lots averaging 5,561 square feet per lot, development of an on-site storm drain basin, and seven outlots over two phases. Phase 1 would consist of approximately 19.57 acres and develop 89 lots, five outlots, and the on-site storm drain basin. Phase 2 would consist of the remaining 14.41 acres and develop 77 lots and two outlots, one of which is a storm drain basin. On- and off-site improvements, including circulation roads, interior local streets, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. As a part of the Project, the Buttonwillow Ditch will be undergrounded per City requirements.

The Project site is located within the City's Sphere of Influence (SOI) and has a planned land use designation of Low Density Residential (4-8 dwelling units per acre [du/acre]) and High Density Residential (15-29 du/acre) pursuant to the Reedley 2030 General Plan. The site is zoned Limited Agricultural (AL-20) according to the County of Fresno zoning map. The Project proposes to amend the planned land use designation of an approximately 3.5-acre portion of the Project site from High Density Residential to Low Density Residential.

Additionally, the Project proposes to pre-zone the Project site and the three rural residential parcels to the northwest, APNs 370-040-13, 370-040-22, and 370-040-23, to the R-1-6 (Low Density Residential) zone district in preparation for annexation of the parcels consistent with the Reedley 2030 General Plan. The annexation request would remove the area from the Fresno County Fire Protection District and the Kings River Conservation District service boundaries. For purposes of the CEQA analysis, these three properties are only considered for annexation into the city limits. There is no new development or change in land use proposed on these properties, and they are considered to be a part of the baseline.

Water, sewer, solid waste, and storm drainage utilities will be provided by the City of Reedley. Electricity will be provided by Pacific Gas and Electric and natural gas will be provided by Southern California Gas.

Construction of the residential development would occur over a maximum of 48 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

Entitlements and Approvals:

- General Plan Amendment Application No. 2025-01
- Rezone Application No. 2025-01
- Vesting Tentative Tract Map No. 6497
- Annexation of the described properties into the City by LAFCo through Annexation Application No. 2025-01

The document and documents referenced in the Initial Study/Mitigated Negative Declaration are available for review at the City of Reedley Community Development Department, located at 1717 9th Street, Reedley, CA 93654.

As mandated by the California Environmental Quality Act (CEQA), the public review period for this document was 30 days (CEQA Section 15073[b]). The public review period is August

19, 2025, and ends on September 18, 2025. For further information, please contact Rodney L. Horton, MPA at 559-637-4200, Ext. 286, or rodney.horton@reedley.ca.gov.

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LIST OF ACRONYMS AND ABBREVIATIONS

ALCUP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
BMPs	Best Management Practices
BSA	biological survey area
CalGEM	Geologic Energy Management Division
CARB	California Air Resources Board
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CH&SC	California Health & Safety Code
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRWQCB	California Regional Water Quality Control Board
CWA	Clean Water Act
DWR	Department of Water Resources
EOP	Emergency Operations Plan
EPA	Environmental Protection Agency
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
gpm	gallons per minute
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HARP2	Hotspot Analysis and Reporting Program
HI	hazard index
hp	horsepower
IpaC	Information for Planning and Consultation
IS	Initial Study
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
mg	milligram
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
mph	miles per hour
MRZs	Mineral Resource Zones
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NHD	National Hydrography Database
NPDES	National Pollutant Discharge Elimination System
NSR	new source review
NWI	National Wetlands Inventory

PG&E	Pacific Gas and Electric Company
PPV	peak particle velocity
PRC	Public Resources Code
SCG	Southern California Gas
SGMA	Sustainable Groundwater Management Act
SJKF	San Joaquin kit fox
SJVAB	San Joaquin Valley Air Basin
SJVAPCD	San Joaquin Valley Air Pollution Control District
SPAL	Small Project Analysis Level
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
TACs	toxic air contaminants
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
WEAT	Worker Environmental Awareness Training
µg/L	micrograms per liter

MITIGATED NEGATIVE DECLARATION

As Lead Agency under CEQA, the City of Reedley Community Development Department has reviewed the Project described below to determine whether it could have a significant effect on the environment because of its development. In accordance with CEQA Guidelines Section 15382, “[s]ignificant effect on the environment” means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance.

Project Name

Vesting Tentative Subdivision Map No. 6497 - Westhaven 2 Project

Project Location

The proposed Project is located within unincorporated Fresno County, immediately adjacent to the City of Reedley corporate limits (APN 370-040-10). The Project site is generally bounded by future East North Avenue to the north, South Buttonwillow Avenue to the east, Rancho Vista residential subdivision to the south, and Buttonwillow Ditch to the west, and is situated approximately nine miles northeast of SR 99 and eight miles south of SR-180. Regional access to the Project site is available by SR-99 and SR-180. Local access to the Project site would be provided via South Buttonwillow Avenue and East North Avenue. The site is located within the Reedley, California, USGS 7.5-minute topographic map, Section 25, Township 15 South, Range 23 East, MDB&M.

Project Description

The Project proposes the development of 166 single-family lots averaging 5,561 square feet per lot, development of an on-site storm drain basin, and seven outlots over two phases. Phase 1 would consist of approximately 19.57 acres and develop 89 lots, five outlots, and the on-site storm drain basin. Phase 2 would consist of the remaining 14.41 acres and develop 77 lots and two outlots, one of which is a storm drain basin. On- and off-site improvements, including circulation roads, interior local streets, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. As a part of the Project, the Buttonwillow Ditch will be undergrounded per City requirements.

The Project site is located within the City’s Sphere of Influence (SOI) and has a planned land use designation of Low Density Residential (4-8 dwelling units per acre [du/acre]) and High Density Residential (15-29 du/acre) pursuant to the Reedley 2030 General Plan. The site is zoned Limited Agricultural (AL-20) according to the County of Fresno zoning map. The Project proposes to amend the planned land use designation of an approximately 3.5-acre portion of the Project site from High Density Residential to Low Density Residential.

Additionally, the Project proposes to pre-zone the Project site and the three rural residential parcels to the northwest, APNs 370-040-13, 370-040-22, and 370-040-23, to the R-1-6 (Low Density Residential) zone district in preparation for annexation of the parcels consistent

with the Reedley 2030 General Plan. The annexation request would remove the area from the Fresno County Fire Protection District and the Kings River Conservation District service boundaries. For purposes of the CEQA analysis, these three properties are only considered for annexation into the city limits. There is no new development or change in land use proposed on these properties, and they are considered to be a part of the baseline.

Water, sewer, solid waste, and storm drainage utilities will be provided by the City of Reedley. Electricity will be provided by Pacific Gas and Electric and natural gas will be provided by Southern California Gas.

Construction of the residential development would occur over a maximum of 48 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
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- Service truck
- Air compressor

Entitlements and Approvals:

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Mailing Address and Phone Number of Contact Person

City of Reedley, Community Development Department
1717 9th St.,
Reedley, CA 93654
Contact Person: Rodney Horton, MPA
Phone: (559) 637-4200

Findings

As Lead Agency, the City of Reedley Community Development Department finds that the Project will not have a significant effect on the environment. The Environmental Checklist (CEQA Guidelines Appendix G) or Initial Study (IS) (*see Section 3 - Environmental Checklist*) identified one or more potentially significant effects on the environment, but revisions to the Project have been made before the release of this Mitigated Negative Declaration (MND) or mitigation measures would be implemented that reduce all potentially significant impacts less-than-significant levels. The Lead Agency further finds that there is no substantial evidence that this Project would have a significant effect on the environment.

Mitigation Measures Included in the Project to Avoid Potentially Significant Effects

MM BIO-1: A preconstruction clearance survey shall be conducted within 14 days prior to the issuance of grading permits or ground disturbance activities to determine if special-status species are present within 250 feet of the Project. The focal species shall include the western burrowing owl, loggerhead shrike, and Swainson's hawk. A copy of the report outlining the results of the survey shall be submitted to the lead agency as evidence of compliance.

MM BIO-2: If construction activities occur between February 1 and September 15, pre-disturbance surveys for active raptor and migratory bird nests must be conducted no more than 10 days prior to the commencement of disturbance. Surveys shall follow USFWS and CDFW guidance and/or protocols, as applicable. If no active nests or nesting birds are identified, then Project construction activities may proceed, and no further mitigation measures for nesting birds are required. If active nest(s) are identified, the active nest(s) should be continuously surveyed for the first 24 hours after detection to establish a behavioral baseline prior to any construction-related activities.

Once construction commences, all nests shall be continuously monitored to detect any behavioral changes because of the Project (i.e., nest avoidance or abandonment). If behavioral changes are observed, the work causing that change shall cease until the applicant's qualified biologist consults with the CDFW and/or the USFWS, and the qualified biologist used by the applicant implements the recommended measures. During such times as the qualified biological monitor is not on site while construction workers are on site, a minimum non-disturbance buffer of 250 feet shall be established around active nests and a 500-foot no-disturbance buffer around the nests of raptors until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, and any adult birds are no longer occupying the nest. Deviations from these no-disturbance buffers may be implemented if the qualified biologist concludes that work within the buffer area would not cause nest avoidance or abandonment (e.g., when the disturbance area would be concealed from a nest site by topography) provided that notification of this determination of a deviation in the no-disturbance buffer is provided by the qualified biologist no less than 15 days in advance to the California Department of Fish and Wildlife and the United States Fish and Wildlife.

MM BIO-3: Because there is potential for the western burrowing owl to occur within or near the Project area, Project-related vehicles shall observe a daytime speed limit of 20 mph throughout the site in all Project areas, except on County roads and State and federal highways; this is particularly important at night when western burrowing owls are most active. Although not anticipated for this Project, nighttime construction shall be minimized to the extent possible. However, if night construction shall occur, then the speed limit shall be reduced to 10 mph. Off-road traffic outside of designated Project areas shall be prohibited.

- a. To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches greater than 2-feet deep shall be covered at the close of each working day by plywood or similar materials. If the trenches cannot be covered, one or more escape ramps constructed of earthen-fill or wooden planks shall be installed. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped wildlife.
- b. Western burrowing owls are attracted to burrow-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or greater stored at a construction site for one or more overnight periods shall be thoroughly inspected for western burrowing owl before the pipe is subsequently buried, capped, or otherwise used or moved in any way.
- c. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the Project site.
- d. No pets, such as dogs or cats, shall be brought onto the Project site by workers to prevent harassment, mortality of western burrowing owls, or destruction of burrows.
- e. Use of rodenticides and herbicides on the Project site shall be restricted. This is necessary to prevent primary or secondary poisoning of western burrowing owls and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the Service. If rodent control must be conducted, zinc phosphide shall be used because of a proven lower risk to wildlife.
- f. A representative shall be appointed by the Project proponent or contractor who shall be the contact source for any employee or contractor who might observe a western burrowing owl. The representative will be identified during the employee education program and his or her name and telephone number shall be provided to the designated biologist.
- g. An employee education program shall be conducted for any Project that has anticipated impacts to western burrowing owls, Swainson's hawks, loggerhead

shrike, or other special-status species. The program shall consist of a brief presentation by persons knowledgeable in western burrowing owl biology and legislative protection to explain endangered species concerns to contractors, their employees, and military and/or agency personnel involved in the Project. The program shall include the following: A description of the western burrowing owl, Swainson's hawk, and loggerhead shrike and their habitat needs; a report of the occurrence of these species within the Project Area; an explanation of the status of the species and its protection under the Endangered Species Act; and a list of measures being taken to reduce impacts to the species during Project construction and implementation. A fact sheet conveying this information shall be prepared for distribution to the previously referenced people and anyone else who may enter the Project area.

- h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.
- i. New sightings of western burrowing owls, Swainson's hawks, or loggerhead shrikes shall be reported to the California Natural Diversity Database (CNDDB).

MM BIO-4: If burrows supporting the western burrowing owl are discovered during the pre-activity surveys conducted under BIO-1, the avoidance buffers outlined below shall be established. No work would occur within these buffers unless the designated biologist approves and monitors the activity.

Disturbance Buffers for Western Burrowing Owl Nesting Sites

Time of Year	Level of Disturbance (meters)		
	Low	Medium	High
April 1 – Aug 15	200	500	500
Aug 16 – Oct 15	200	200	500
Oct 16 – Mar 31	50	100	500

MM BIO-5: When an active western burrowing owl or raptor nest is identified, and when construction activities occur within the avoidance buffer of the nest, a qualified biologist shall conduct a daily site visit to observe all construction-related activities and activity near an active nest. If construction activities are not occurring within the avoidance buffer of a den or nest, these resources should conduct a weekly site visit to observe activity near an active nest. The qualified biologist should be familiar with all potential species and their sign (i.e., tracks, scat, etc.) that have the potential to occur within the proposed Project Area. The qualified biologist will prepare a daily datasheet to record all construction-related activities that occurred and activity at an active nest or den, and document the progress of the Project with photographs.

MM BIO-6: If construction work occurs after August 30 and ends before March 1 (outside of the breeding season), impacts to the Swainson's hawk would be avoided. Surveys would not

be required for work conducted during this part of the year, and no further mitigation for nest disturbance is required.

- a. Protocol Surveys. For work that begins between March 1 and August 30, a qualified biologist with expertise in Swainson's hawk shall conduct protocol surveys of potential nesting habitat within 0.5 miles of any construction activities prior to initiation of such activities. The Project applicant shall conduct a protocol-level survey in conformance with the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley," Swainson's Hawk Technical Advisory Committee (TAC) (<https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds>) (May 31, 2000), hereby incorporated by reference. This protocol prescribes minimum standards for survey equipment, mode of survey, angle and distance to tree, speed, visual and audible clues, distractions, notes and observations, and timing of surveys.

A written report with the pre-construction survey results must be provided to the Planning Department and CDFW within 30 days of the commencement of construction-related activities. The report shall include: the date of the report, authors and affiliations, contact information, introduction, methods, study location, including a map, results, discussion, and literature cited.

If the required protocol surveys show there are no active Swainson's hawk nests within 0.5 miles of construction activities, then no further mitigation for nest disturbance will be required. If protocol surveys show that there are no active Swainson's hawk nests within 10 miles of the site, then no further mitigation for foraging impacts will be required.

- b. Nest Avoidance. If nesting Swainson's hawks are observed within 0.5 miles of the Project site during the protocol surveys, the Project applicant must implement CDFW pre-approved mitigation measures to avoid nest impacts during construction. These measures include:
 - All Project-related activities with the potential to cause nest abandonment or forced fledging of young shall be avoided until the young have fledged.
 - If disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging are necessary, within the nest protection buffer zone (0.5-mile), monitoring of the nest site by a qualified raptor biologist, funded by the Project applicant, shall be required to determine if the nest is abandoned. If the nest is abandoned, but the nestlings are still alive, the Project proponent is required to fund the recovery and hacking, that is, the controlled release of captive-reared young, of the nestling.
 - The Project applicant shall be required to coordinate with CDFW to determine if Project activities with the potential to cause disturbance to nesting Swainson's

hawks within the 0.5-mile buffer may proceed with a reduced nest buffer and an approved biological monitor. CDFW may authorize a reduced nest buffer with the presence of a monitoring biologist during construction activities to ensure that the nest is not disturbed. Routine disturbances such as agricultural activities, commuter traffic, and routine maintenance activities within 0.5 miles of an active nest are not prohibited.

MM BIO-7: Prior to the initiation of construction activities, all construction personnel shall attend a Worker Environmental Awareness Training program developed by a qualified biologist. Any personnel associated with construction that did not attend the initial training shall be trained by the authorized biologist or authorized construction personnel prior to working within the Project area. Any employee responsible for the operations, maintenance, or decommissioning of Project facilities shall attend the Worker Environmental Awareness Training program prior to starting work on the Project. All on-site workers shall attend training on an annual basis. The Program shall be developed and presented by the Project's qualified biologist(s) or designee approved by the qualified biologist(s). The program shall include information about the life histories of State or federally listed species with potential to occur in the Project area, their legal status, course of action should these species be encountered on-site, and avoidance and minimization measures to protect these species. The training shall include the following components:

- a. Information about the life history and identification of federally listed plant and wildlife species, as well as other special-status plant and wildlife species that may be affected by Project activities. The program shall present the legal protection status of each such species, the definition of "take" under the Federal Endangered Species Act and California Endangered Species Act, measures the Project proponent/operator shall implement to protect the species, reporting requirements, specific measures for workers to avoid take of special-status plant and wildlife species, and penalties for violation of Project permits or other Project-related environmental measures.
- b. An acknowledgement form signed by each worker indicating that the Worker Environmental Awareness Training and Education program has been completed shall be kept on file at the construction site.
- c. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the Worker Environmental Awareness Training and Education program, and signed acknowledgement forms, shall be submitted to the contractor's construction manager or on-site superintendent.
- d. A copy of the training transcript, training video or informational binder for specific procedures shall be kept available for all personnel to review and be familiar with, as necessary.
- e. The construction crews and contractor(s) shall be responsible for preventing unauthorized impacts from Project activities to sensitive biological resources that are outside the areas defined as subject to impacts by Project permits. Unauthorized

impacts may result in Project stoppage, and/or fines depending on the impact and coordination with the appropriate State or federal biological agency.

MM BIO-8: Prior to the issuance of any grading or building permit, the Project proponent/developer shall conduct a delineation of the Buttonwillow Ditch, and prepare an Aquatic Resources Delineation Report (ARDR). The ARDR shall be submitted with a formal notification to the US Army Corps of Engineers (ACOE), Water Resources Control Board (SWRCB), and California Department of Fish and Wildlife (CDFW). If no comments or requests for additional permitting are received by the agencies, no further action is necessary. A copy of all correspondence shall be submitted to the lead agency.

If a regulatory agency comments or requests additional permitting, the following actions may be taken. A copy of all correspondence and subsequent permitting and/or reports shall be made available to the Lead Agency. The report shall include information as shown below, as a plan if necessary, and shall outline compliance with the following:

- a. Delineation of all jurisdictional features at the project site. Potential jurisdictional features within the project boundary identified in the jurisdictional delineation report may be shown in plan form.
- b. If the Project has a potential to directly or indirectly impact jurisdictional aquatic resources, a formal aquatic resource delineation of these areas shall be performed by a qualified professional to determine the extent of agency jurisdiction and permits/authorizations from the appropriate regulating agencies (Central Valley Regional Water Quality Control Board (RWQCB), CDFW and US Army Corps of Engineers (USACE) shall be obtained prior to disturbance to jurisdictional features.

If it is determined that drainage is jurisdictional and cannot be avoided, the Project proponent shall obtain a Section 401 Water Quality Certification from the RWQCB, a Section 404 permit from USACE, and a Lake and Streambed Alteration Agreement under Section 1602 from the CDFW, if required, prior to impacting any waters.

As part of these authorizations, compensatory mitigation may be required by the regulating agencies to offset the loss of aquatic resources. If so, and as part of the permit application process, a qualified professional shall draft a Mitigation and Monitoring Plan to address implementation and monitoring requirements under the permit to ensure that the Project would result in no net loss of habitat functions and values. The Plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The Plan shall be approved by the appropriate regulating agencies, and compensatory mitigation shall take place either on-site or at an appropriate off-site location.

- c. Any material/spoils generated from project activities containing hazardous materials shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Protection measures should follow project-specific criteria as developed in a Stormwater Pollution Prevention and Protection Plan (SWPPP).
- d. Equipment containing hazardous liquid materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and at least 50 feet outside the delineated boundary of jurisdictional water features.
- e. Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative shall be notified.

MM CUL-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If a qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation, or data recovery excavation.

MM CUL-2: In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find, and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the developer and City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines.

If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and required to be provided to the developer and City. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the lead agency approves the measures to protect these resources.

Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

MM CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development Project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a).

If the remains are determined to be of Native American descent, the Coroner shall, within 24 hours, notify the NAHC. The NAHC shall then contact the most likely descendant of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

MM GEO-1: Prior to issuance of grading or building permits, the Project applicant shall submit to the City: (1) the approved SWPPP and (2) the Notice of Intent (NOI) to comply with the General NPDES from the Central Valley Regional Water Quality Control Board. The requirements of the SWPPP and NPDES shall be incorporated into design specifications and construction contracts. Recommended Best Management Practices for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly.
- Protecting existing storm drain inlets and stabilizing disturbed areas.
- Implementing erosion controls.
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment control.

MM GEO-2: In the event paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction

in that area shall not resume until the resource-appropriate measures are recommended or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

MM NSE-1: A sound wall shall be constructed to a minimum height of 6 feet along the South Buttonwillow Avenue Project site frontage. The sound wall shall be turned inward at Lot 1, Lot 98, Lot 99, and Lot 109. Suitable construction materials include concrete blocks, masonry, or stucco on both sides of a wood or steel stud wall. Prior to the issuance of building permits, plans and specifications shall include the identification of the required sound wall location, height, and construction materials.

MM TRA-1: The Project proponent shall pay its equitable share cost percentage for intersection improvements at the listed intersection. Payment amount of the equitable share costs shall be determined by the City of Reedley and paid prior to the issuance of building permits.

- a. Signalization of South Buttonwillow Avenue and North Avenue: 20.51 percent.

SECTION 1 - INTRODUCTION

1.1 - Overview

D.R. Horton (applicant) is proposing to construct a 166-lot single-family subdivision (Project) in the City of Reedley in Fresno County in the San Joaquin Valley, California. The Project will require approval of an annexation of the property into the City limits, a General Plan Amendment, a pre-zone change, and approval of a subdivision map.

Figure 1-1 is a map of the regional location, and Figure 1-2 shows the Project location, Figure 1-3 depicts the Project in relation to the City's Sphere of Influence (SOI), and Figure 1-4 depicts the tentative tract map.

1.2 - California Environmental Quality Act

The City of Reedley is the Lead Agency for this Project pursuant to the CEQA Guidelines (Public Resources Code Section 15000 et seq.). The Environmental Checklist (CEQA Guidelines Appendix G) or IS (see *Section 3 – Initial Study*) provides analysis that examines the potential environmental effects of the construction and operation of the Project. Section 15063 of the CEQA Guidelines requires the Lead Agency to prepare an IS to determine whether a discretionary Project will have a significant effect on the environment. An MND is appropriate when an IS has been prepared, and a determination can be made that no significant environmental effects will occur because revisions to the Project have been made or mitigation measures will be implemented that reduce all potentially significant impacts to less-than-significant levels. The content of an MND is the same as a Negative Declaration, with the addition of identified mitigation measures and a Mitigation Monitoring and Reporting Program (MMRP) (see *Section 6 – Mitigation Monitoring and Reporting Program*).

Based on the IS, the Lead Agency has determined that the environmental review for the proposed application can be completed with an MND.

1.3 - Impact Terminology

The following terminology is used to describe the level of significance of impacts.

- A finding of “no impact” is appropriate if the analysis concludes that the Project would not affect a topic area in any way.
- An impact is considered “less than significant” if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered “less than significant with mitigation incorporated” if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments that have been agreed to by the applicant.
- An impact is considered “potentially significant” if the analysis concludes that it could have a substantial adverse effect on the environment.

1.4 - Document Organization and Contents

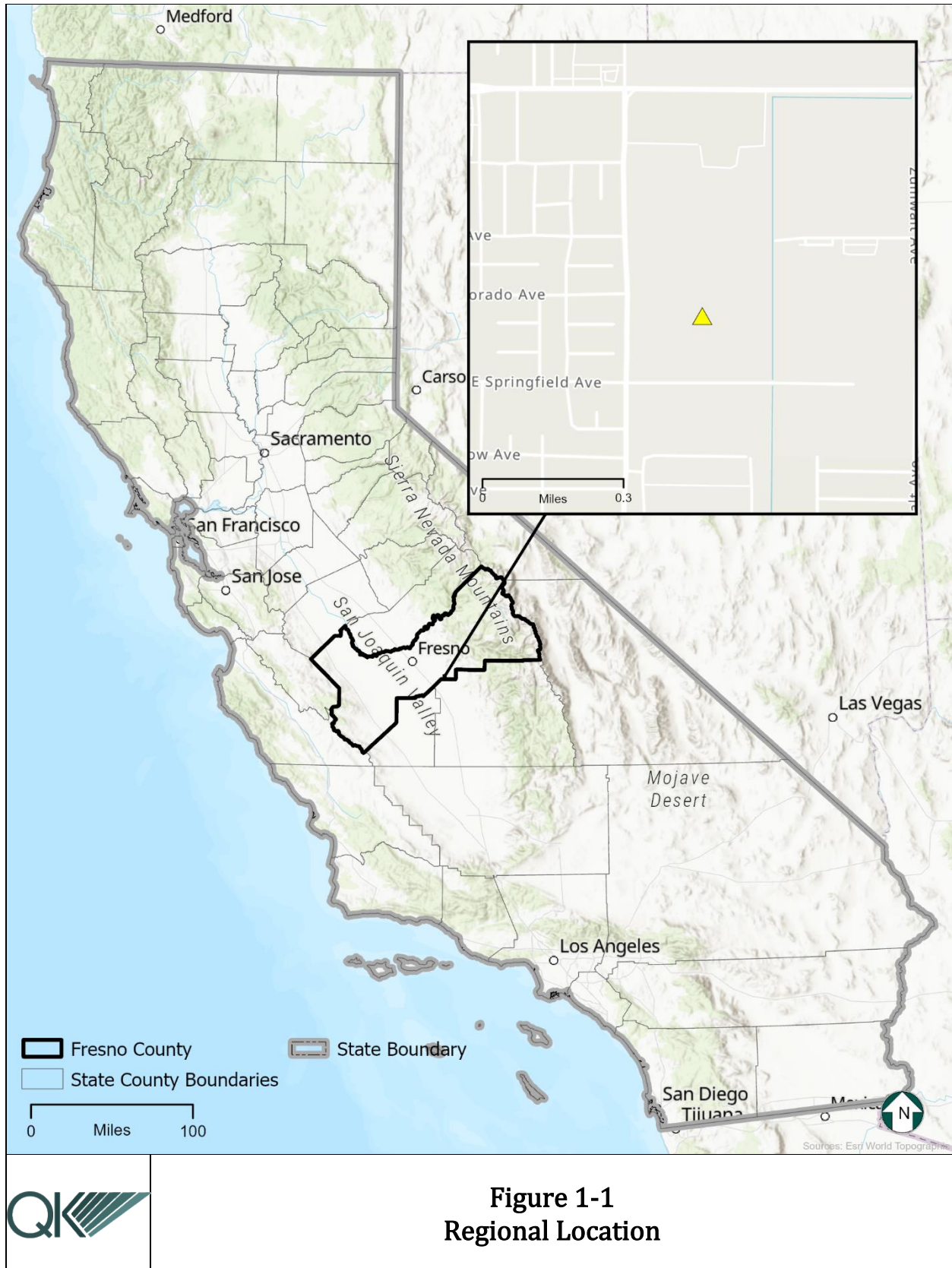
The content and format of this Initial Study/Mitigated Negative Declaration (IS/MND) is designed to meet the requirements of CEQA. The report contains the following sections:

- *Section 1 – Introduction:* This section provides an overview of CEQA requirements, intended uses of the IS/MND, document organization, and a list of regulations that have been incorporated by reference.
- *Section 2 – Project Description:* This section describes the Project and provides data on the site's location.
- *Section 3 – Initial Study:* This section contains the evaluation of 21 different environmental resource factors contained in Appendix G of the CEQA Guidelines. Each environmental resource factor is analyzed to determine whether the proposed Project would have an impact. One of four findings is made, which includes no impact, less-than-significant impact, less than significant with mitigation, or significant and unavoidable. If the evaluation results in a finding of significant and unavoidable impacts for any of the 21 environmental resource factors, then an Environmental Impact Report will be required.
- *Section 4 – List of Preparers:* This section identifies the individuals who prepared the IS/MND.
- *Section 5 – Bibliography:* This section contains a full list of references that were used in the preparation of this IS/MND.
- *Section 6 – Mitigation Monitoring and Reporting Program:* This section contains the Mitigation Monitoring and Reporting Program.

1.5 - Incorporated by Reference

The following documents and/or regulations are incorporated into this IS/MND by reference:

- City of Reedley 2030 General Plan
- City of Reedley General Plan Environmental Impact Report (EIR)
- Reedley Municipal Code – Title 10 Zoning Regulations
- Reedley Municipal Code – Title 11 Subdivision Regulations
- Fresno County Airport Land Use Compatibility Plan



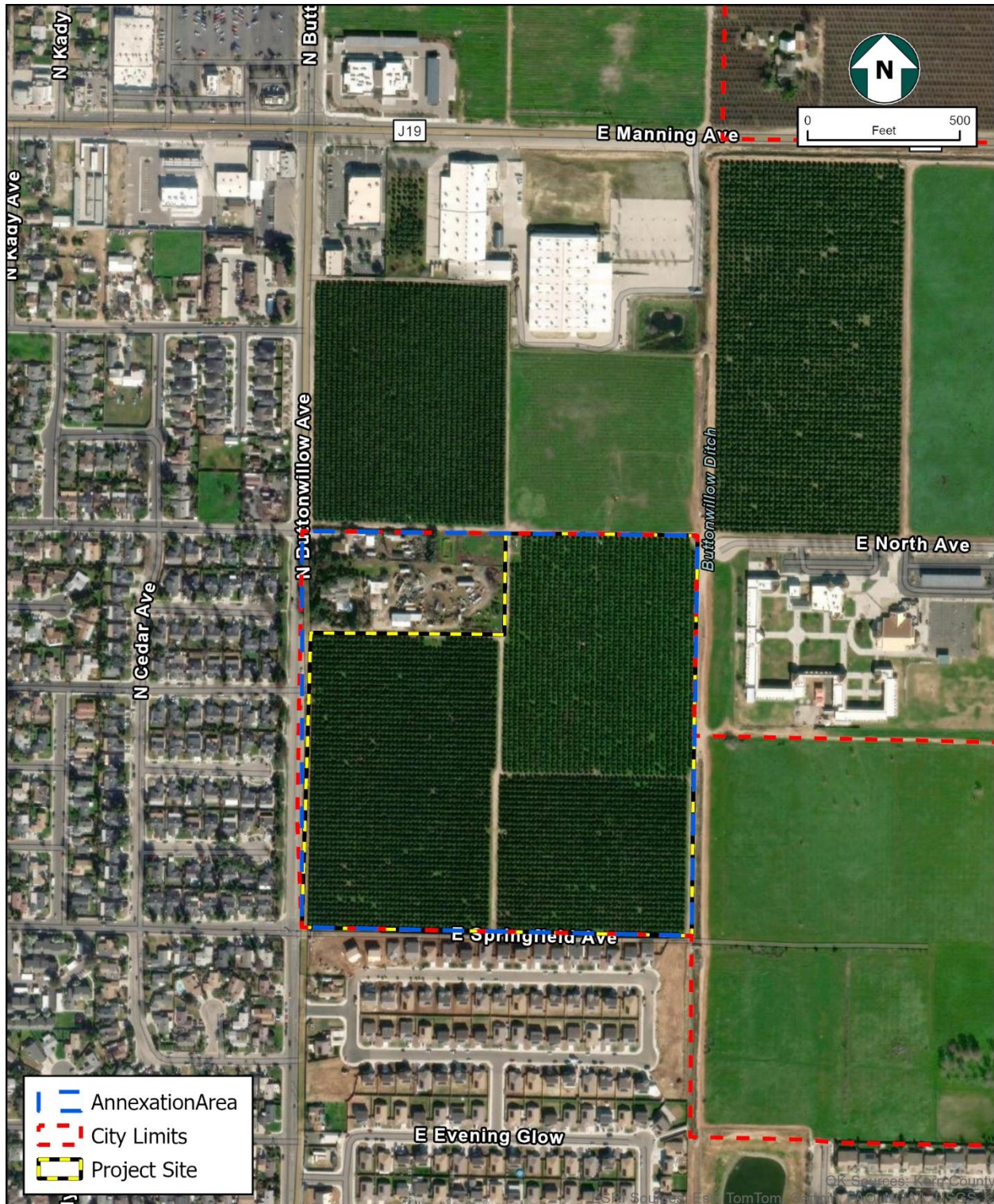


Figure 1-2
Project Site

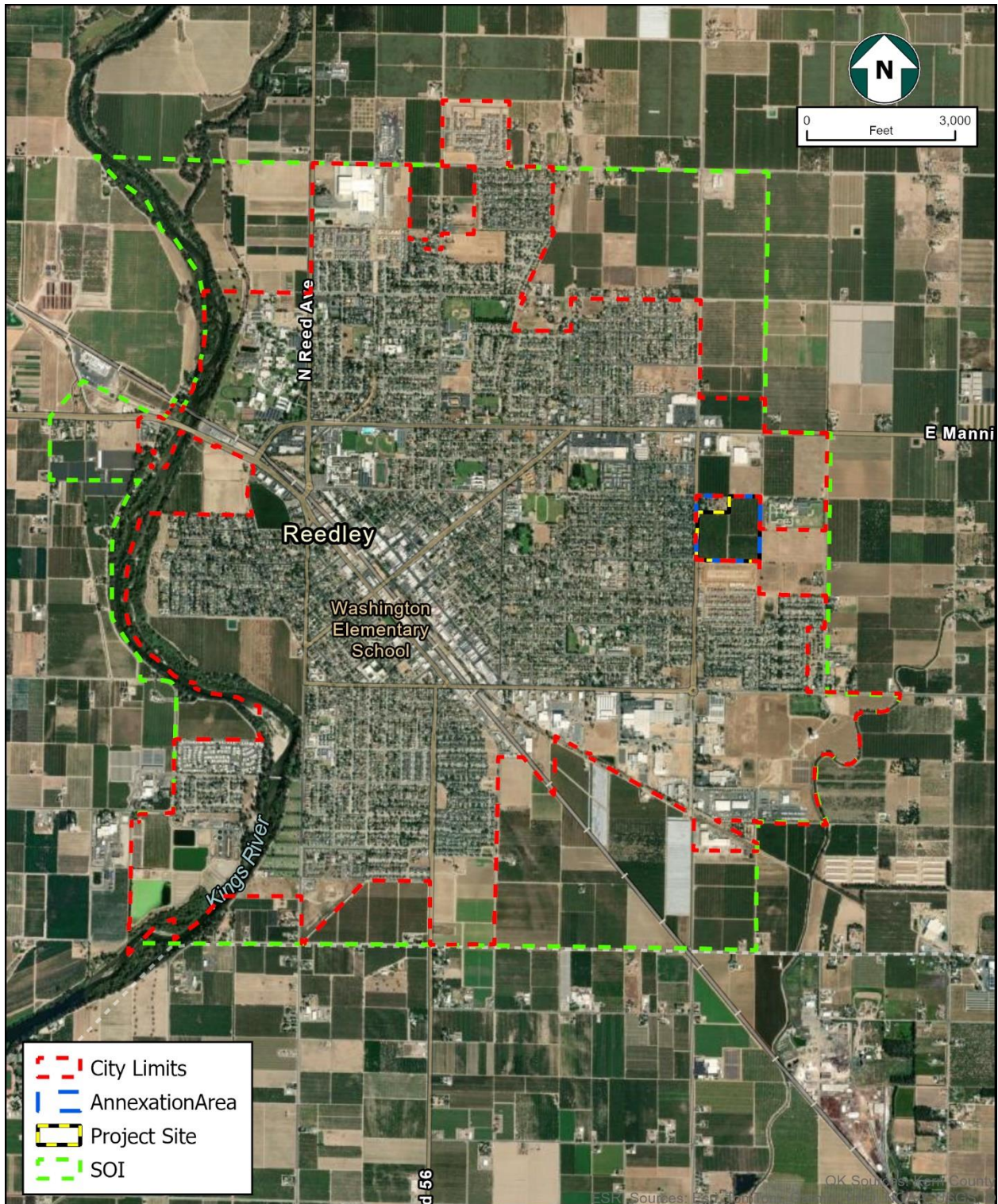


Figure 1-3
Sphere of Influence

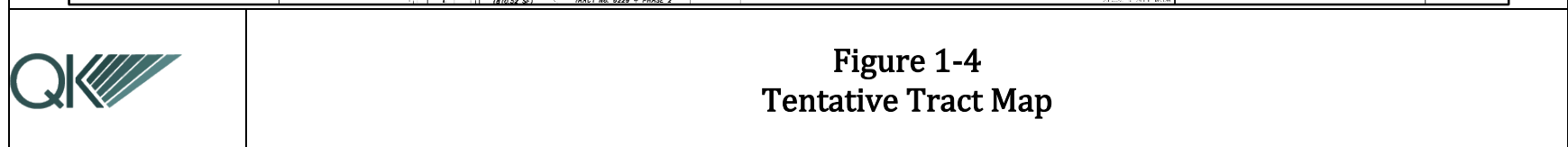


**Figure 1-4
Tentative Tract Map**

SECTION 2 - PROJECT DESCRIPTION

2.1 - Introduction

D.R. Horton (applicant) is proposing to construct a 166-lot single-family subdivision (Project) in the City of Reedley in Fresno County in the San Joaquin Valley, California. The Project will require approval of an annexation of the property into the City limits, a General Plan Amendment, a pre-zone change, and approval of a subdivision map. Figure 1-1 is a map of the regional location, and Figure 1-2 shows the Project location, Figure 1-3 show the project site in relation to the SOI, and Figure 1-4 depicts the tentative tract map.

2.2 - Project Location

The proposed Project is located within unincorporated Fresno County, immediately adjacent to the City of Reedley corporate limits (APN 370-040-10). The Project site is generally bounded by future East North Avenue to the north, South Buttonwillow Avenue to the east, Rancho Vista residential subdivision to the south, and Buttonwillow Ditch to the west, and is situated approximately nine miles northeast of SR 99 and eight miles south of SR-180. Regional access to the Project site is available by SR-99 and SR-180. Local access to the Project site would be provided via South Buttonwillow Avenue and East North Avenue. The site is located within the Reedley, California, USGS 7.5-minute topographic map, Section 25, Township 15 South, Range 23 East, MDB&M.

2.3 - Project Environment

The Project site is located in unincorporated Fresno County, immediately adjacent to the City of Reedley corporate limits. The Project site is designated as Low Density Residential (4-8 du/acre [30.5 acres]) and High Density Residential (15-29 du/acre [3.5 acres]) in the City of Reedley 2030 General Plan. The Project site is zoned AL-20 (Limited Agricultural) by the County of Fresno.

The proposed Project site is generally bounded by future East North Avenue to the north, South Buttonwillow Avenue to the east, Rancho Vista residential subdivision to the south, and Buttonwillow Ditch to the west. Regional access to the Project site is available by SR-99 and SR-180. Local access to the Project site would be provided via South Buttonwillow Avenue and future East North Avenue.

The property is surrounded by agricultural and vacant land to the north, a school to the east, agricultural land to the south, and single-family residences to the west.

2.4 - Proposed Project

The Project proposes the development of 166 single-family lots averaging 5,561 square feet per lot, development of an on-site storm drain basin, and seven outlots over two phases. Phase 1 would consist of approximately 19.57 acres and develop 89 lots, five outlots, and the on-site storm drain basin. Phase 2 would consist of the remaining 14.41 acres and develop

77 lots and two outlots, one of which is a storm drain basin. On- and off-site improvements, including circulation roads, interior local streets, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project. As a part of the Project, the Buttonwillow Ditch will be undergrounded per City requirements.

The Project site is located within the City's Sphere of Influence (SOI) and has a planned land use designation of Low Density Residential (4-8 dwelling units per acre [du/acre]) and High Density Residential (15-29 du/acre) pursuant to the Reedley 2030 General Plan. The site is zoned Limited Agricultural (AL-20) according to the County of Fresno zoning map. The Project proposes to amend the planned land use designation of an approximately 3.5-acre portion of the Project site from High Density Residential to Low Density Residential.

Additionally, the Project proposes to pre-zone the Project site and the three rural residential parcels to the northwest, APNs 370-040-13, 370-040-22, and 370-040-23, to the R-1-6 (Low Density Residential) zone district in preparation for annexation of the parcels consistent with the Reedley 2030 General Plan. The annexation request would remove the area from the Fresno County Fire Protection District and the Kings River Conservation District service boundaries. There is no new development or change in land use proposed on these properties, and they are considered to be a part of the baseline.

Water, sewer, solid waste, and storm drainage utilities will be provided by the City of Reedley. Electricity will be provided by Pacific Gas and Electric and natural gas will be provided by Southern California Gas.

Construction of the residential development would occur over a maximum of 48 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

Entitlements and Approvals:

- General Plan Amendment Application No. 2025-01
- Rezone Application No. 2025-01
- Vesting Tentative Tract Map No. 6497
- Annexation of the described properties into the City by LAFCo through Annexation Application No. 2025-01

SECTION 3 - INITIAL STUDY

3.1 - Environmental Checklist

1. Project Title:

Vesting Tentative Tract Map No. 6497 - Westhaven 2 Subdivision Project

2. Lead Agency Name and Address:

City of Reedley Community Development Department
1717 9th Street
Reedley, CA 93654

3. Contact Person and Phone Number:

Rodney Horton, MPA
(559) 637-4200
Rodney.horton@reedley.ca.gov

4. Project Location:

The proposed Project is located on an undeveloped 34-net-acre parcel within unincorporated Fresno County, immediately adjacent to the City of Reedley corporate limits (Assessor's Parcel Number [APN] 370-040-10). The Project site is generally bounded by future East North Avenue to the north, South Buttonwillow Avenue to the east, Rancho Vista residential subdivision to the south, and Buttonwillow Ditch to the west. The site is located within the Reedley, California, United States Geological Survey (USGS) 7.5-minute topographic map, Section 25, Township 15 South, Range 23 East, Mount Diablo Base and Meridian (MDB&M).

It is situated approximately nine miles northeast of State Route (SR) 99 and eight miles south of SR-180. Regional access to the Project site is available by SR-99 and SR-180. Local access to the Project site would be provided via South Buttonwillow Avenue and East North Avenue.

5. General Plan Designation:

Existing: Low Density Residential (4-8 du/acre), 30.48 acres, and High Density Residential (15-29 du/acre), 3.5 acres

Proposed: Low Density Residential (4-8 du/acre), 33.98 acres

6. Zoning:

Existing: AL-20 (Limited Agricultural)

Proposed: R-1-6 (Low Density Residential)

7. Description of Project:

The Project proposes the development of 166 single-family lots averaging 5,561 square feet per lot, development of an on-site storm drain basin, and seven outlots over two phases. Phase 1 would consist of approximately 19.57 acres and develop 89 lots, five outlots, and the on-site storm drain basin. Phase 2 would consist of the remaining 14.41 acres and develop 77 lots and two outlots. On- and off-site improvements, including circulation roads, interior local streets, curb, gutter, sidewalk, open space, and landscaping, are proposed as part of the Project.

The Project site is located within the City's Sphere of Influence (SOI) and has a planned land use designation of Low Density Residential (4-8 dwelling units per acre [du/acre]) and High Density Residential (15-29 du/acre) pursuant to the Reedley 2030 General Plan. The site is zoned Limited Agricultural (AL-20) according to the County of Fresno zoning map. The Project proposes to amend the planned land use designation of an approximately 3.5-acre portion of the Project site from High Density Residential to Low Density Residential. Additionally, the Project proposes to pre-zone the Project site and the three rural residential parcels to the northwest, APNs 370-040-13, 370-040-22, and 370-040-23, to the R-1-6 (Low Density Residential) zone district in preparation for annexation of the parcels consistent with the Reedley 2030 General Plan. The annexation request would remove the area from the Fresno County Fire Protection District and the Kings River Conservation District service boundaries.

Water, sewer, solid waste, and storm drainage utilities will be provided by the City of Reedley. Electricity will be provided by Pacific Gas and Electric and natural gas will be provided by Southern California Gas.

Construction of the residential development would occur over a maximum of 48 months. It is anticipated that the following pieces of equipment would be used during construction activities:

- Roller
- Loaded trucks
- Excavator
- Generator
- Service truck
- Air compressor

Entitlements and Approvals:

- General Plan Amendment Application No. 2025-01,
- Rezone Application No. 2025-01, a
- Vesting Tentative Tract Map No. 6497
- Annexation of the described properties into the City by LAFCo through Annexation Application No. 2025-01

8. Surrounding Land Uses and Setting:

The property is bounded by single-family residences and vacant land to the north, a school and vacant land to the east, and single-family subdivisions to the south and west.

9. Other Public Agencies Whose Approval May be Required:

- California State Water Resources Control Board
- California Department of Fish and Wildlife
- Regional Water Quality Control Board – Central Valley
- San Joaquin Valley Air Pollution Control District
- Fresno Local Agency Formation Commission
- US Fish and Wildlife
- Army Corps of Engineers

3.2 - Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

3.3 - Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed

adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature

Rodney Horton, MPA

Printed Name

Date

City of Reedley

For

3.4 - Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a Lead Agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to Projects like the one involved (e.g., the Project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on Project-specific factors as well as general standards (e.g., the Project will not expose sensitive receptors to pollutants, based on a Project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as Project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the Lead Agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-Than-Significant Impact." The Lead Agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less-than-significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the Project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a Project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question.
 - b. The mitigation measure identified, if any, to reduce the impact to less than significant.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.1 - AESTHETICS

Except as provided in Public Resources Code Section 21099, would the Project:

a.	Have a substantial adverse effects on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c.	In non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? 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 that would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

Impact #3.4.1a – Would the Project have a substantial adverse effect on a scenic vista?

Scenic vistas are defined as expansive views of highly valued landscapes from publicly accessible viewpoints. Scenic vistas include views of natural features such as topography, water courses, rock outcrops, and natural vegetation, as well as manmade scenic structures. The City of Reedley General Plan 2030 EIR (General Plan EIR) identifies the City's primary scenic and visual resources as the land use pattern throughout the city and the scenic vistas of the surrounding agricultural land from the city's urban edge (City of Reedley 2013). The General Plan EIR found no significant impacts to scenic vistas in the Project area from future buildout of the General Plan. City General Plan Policy COSP 4.2.2 identifies the need to foster and maintain the scenic atmosphere of the river front area. The Project site is not located near the river front. Therefore, the Project would not adversely impact scenic vistas or scenic resources in the City of Reedley.

The Project site is not within or in the vicinity of a city, county, or State-identified scenic vista. Furthermore, the development of the Project would not block or preclude views of any area of importance or what would be considered visually appealing landforms. Therefore, a less-than-significant impact is anticipated on scenic resources.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *a less-than-significant impact*.

Impact #3.4.1b – Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

See Impact #3.4.1a above.

The Project does not lie near or within a State Designated or Eligible State Scenic Highway (California Department of Transportation 2024). The nearest Eligible Scenic Highway is SR-180, approximately eight miles north of the Project site. The Project does not include the destruction of rock outcroppings or degradation of any historic building(s). The Project would remove the agricultural orchard from the site, none of which are native tree species. However, as noted in Impact 3.4.1a above, the General Plan EIR found no significant impacts to scenic vistas in the Project area from future buildout of the General Plan. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.1c – In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

The Project site is located along the eastern edge of the City. The property is bounded by agricultural and vacant land to the north, single-family residential to the east, vacant land and a school to the west, and single-family residential to the south. The proposed pre-zoning designation of R-1-6 is consistent with the planned land use designation of the site.

The proposed residential development will be subject to the City Zoning Code, Chapter 10.10.030, which contains development and landscaping standards for residentially zoned areas. The proposed Project would be constructed to have a similar visual quality and character as the existing residential developments to the west and south, and would not substantially degrade the existing visual character of the area. The Project would comply with applicable City development and landscape standards as defined in the Zoning Code for the R-1-6 (Low Density Residential) zone district and would not conflict with applicable

zoning and other regulations governing scenic quality. As such, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.1d – Would the Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Existing sources of nighttime lighting in the vicinity of the site include streetlights along South Buttonwillow Avenue, light from the headlights of vehicles traveling along South Buttonwillow Avenue, outdoor lighting from the neighboring school to the east, and the surrounding residential development.

Construction of the proposed Project would generally occur during daytime hours, as regulated by the General Plan Noise Element. Increased truck traffic and the transport of construction materials to the Project site would also be minimal and temporary in nature. Construction activity would focus on specific areas on the sites, and any sources of glare would not be stationary for a prolonged period of time. Therefore, construction of the proposed Project would not create a new source of substantial glare that would affect daytime views in the area.

Once constructed, the Project will include typical exterior lighting for the proposed residences. With the compliance of the Reedley Zoning Ordinance and General Plan, specifically Section 9-4-4 of the Reedley Municipal Code for property maintenance standards for exterior lighting, and other applicable local development standards, the proposed Project would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.2 - AGRICULTURE AND FORESTRY RESOURCES

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☒ | ☐ |
| b. Conflict with existing zoning for agricultural use or a Williamson Act contract? | ☐ | ☐ | ☒ | ☐ |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? | ☐ | ☐ | ☐ | ☒ |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | ☐ | ☐ | ☒ | ☐ |

Discussion

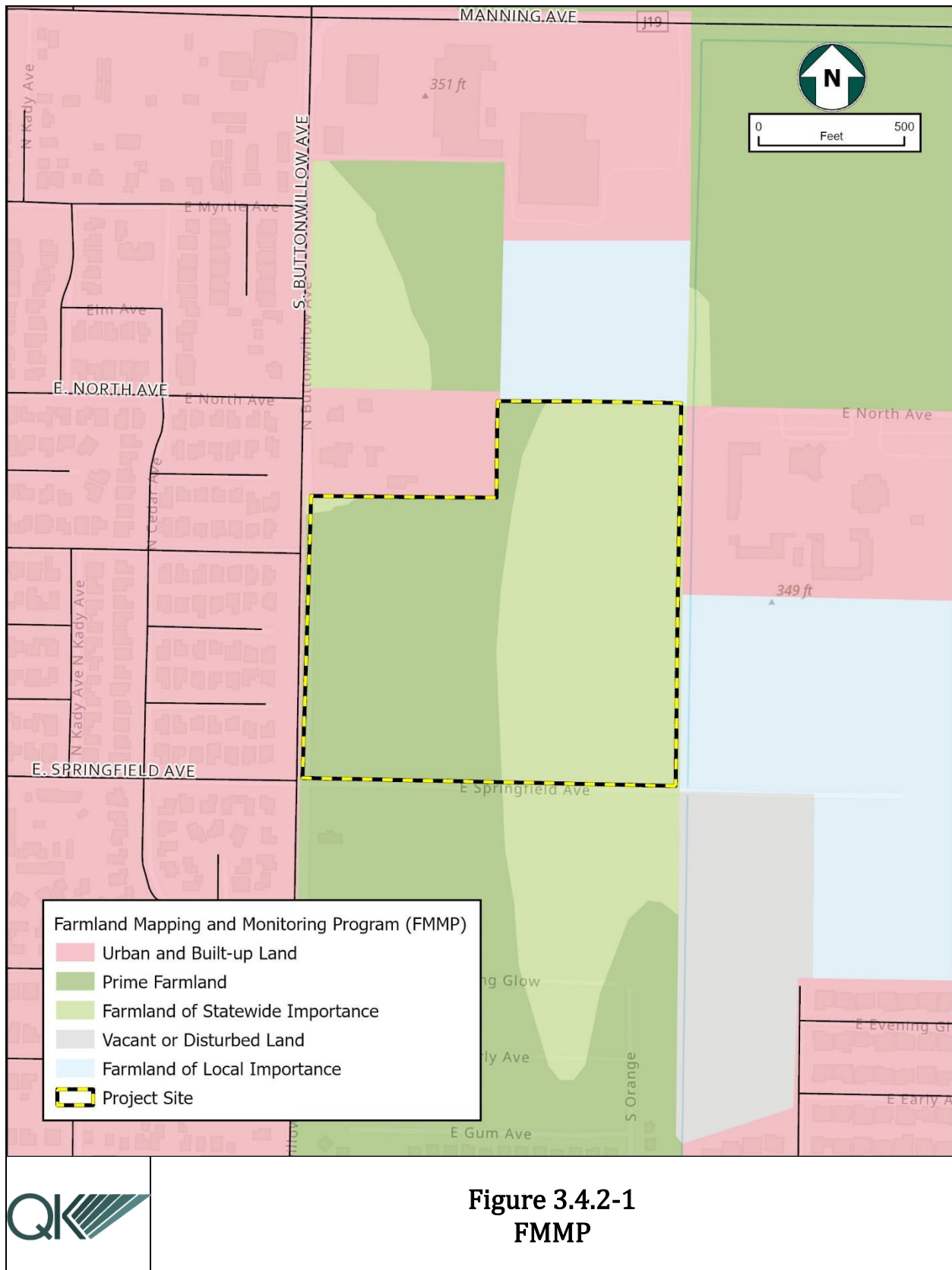
Impact #3.4.2a – Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The Farmland Mapping and Monitoring Program (FMMP) designation of the Project site is listed as 18.3 acres of Farmland of Statewide Importance and 15.9 acres of Prime Farmland as depicted in Figure 3.4.2-1 (California Department of Conservation 2024). The City General Plan indicates that the Project is within the City SOI and has designated the site for low density residential.

The California Department of Conservation indicates that Fresno County had a total acreage of 658,146 acres of Prime Farmland, 380,285 acres of Farmland of Statewide Importance, 94,215 acres of Unique Farmland, and 202,159 acres of Farmland of Local Importance (California Department of Conservation 2022). In consideration of the Project, a conversion of approximately 34.2 acres of Important Farmland (15.9 acres of Prime Farmland and 18.3 acres of Farmland of Statewide importance) to non-agricultural use would occur. The conversion of Prime Farmland would be approximately 0.002 percent, and the conversion of Farmland of Statewide Importance to a non-agricultural use would be 0.004 percent of the Important Farmland totals discussed above.

The General Plan contains a range of policies that would minimize the potential for premature conversion of important farmland within the SOI, including LU 2.5.2, which requires development opportunities in the City to be sequential and contiguous to existing development to ensure the orderly extension of municipal services and unnecessary conversion of agricultural land. Additionally, LU 2.5.7 requires contiguous development within the SOI unless it can be demonstrated that the development of contiguous property is infeasible. Under Policy COSP 4.3.3, a Farmland Preservation Plan that includes a set of policies, standards, and measures to avoid unnecessary conversion of agricultural lands would be adopted by the City.

The Project site is directly adjacent to built-up areas within the City limits. Although Project implementation would result in the conversion of farmland to a non-agricultural use, approval of the Project would constitute contiguous development, which would prevent potential cumulative consumption of agricultural land for additional development in the City of Reedley. This conversion can be considered as development through General Plan implementation as discussed in the General Plan EIR. As noted above, the City has designated the Project site for residential development through its land use designation, which is consistent with the General Plan Policies noted above. As such, this impact is less than significant.



MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.2b – Would the Project conflict with existing zoning for agricultural use or a Williamson Act contract?

The Project site is not subject to a Williamson Act land use contract, according to data available from the California Department of Conservation. The Project site is zoned for agricultural use under the County of Fresno; however, the Project site is planned for residential development in the General Plan.

As discussed in Impact #3.4.2a, the Project site is located within the City's SOI and has been designated for residential development through the adopted General Plan Land Use Map. The Project proposes to develop the site for residential purposes that is consistent with the Reedley General Plan and Zoning Ordinance. Under adopted policies of the General Plan, growth into agricultural areas is managed through limiting premature conversion of agricultural areas and ensuring that agricultural use of land within the SOI remains viable until such time as the annexation and development of a site is contiguous with urban development. Therefore, although the site is currently zoned for agricultural use, its location within the SOI and its proximity to adjacent existing urban development make the Project the natural progression toward the full buildout of the General Plan and, therefore, would comply with previously discussed General Plan policies for orderly expansion and managed growth. This allows the proposed annexation and rezoning of the Project site to a non-agricultural use to occur. As such, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.2c – Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Public Resources Code (PRC) Section 12220(g) and Section 4526 defines "forest land" as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions and that allows for the management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality,

recreation, and other public benefits. Timberland, pursuant to PRC 4526, is land other than land owned by the federal government and land designated as experimental forest land, which is available for and capable of growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

There are no forest lands or timberlands identified on the Project site, and the Project would not result in the loss or conversion of forest land to a non-forest use. Therefore, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.2d – Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

See discussion of Impact #3.4.2c above.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.2e – Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

See discussion of Impacts #3.4.2a, #3.4.2b, and #3.4.2c above.

As noted previously, the site is currently planted to citrus fruit; however, it is the landowner's desire to discontinue farming and develop the site to complement adjacent urban-type development to the west and north. The site is ideally suited for the proposed Project as it is within a reasonable continuity of urban-type development. The majority of properties to the north, east, and west are all designated as non-agricultural under the FMMP, and several are already being developed with residential tracts.

As previously discussed, the General Plan policies require an orderly expansion of the Reedley City Limits, thus avoiding premature conversion of farmland. Additionally, the General Plan provides for planned, orderly expansion through implementation of its adopted General Plan Land Use Map. The Project is consistent with both General Plan policy and

General Plan designated land uses and would not result in the conversion of Important Farmland to non-agricultural use or conversion of forest land to non-forest use. Impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.3 - AIR QUALITY

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

a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d.	Result in other emissions (such as those leading to odor) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

The analyses in this section are based on an *Air Quality Impact Analysis* (QK 2025a) attached as Appendix A.

Impact #3.4.3a – Would the Project conflict with or obstruct implementation of the applicable air quality plan?

The Project area is located within Fresno County in the San Joaquin Valley Air Basin (SJVAB or Basin). Fresno County is included among the eight counties that comprise the San Joaquin Valley Air Pollution Control District (SJVAPCD). The SJVAPCD acts as the regulatory agency for air pollution control in the Basin and is the local agency empowered to regulate air pollutant emissions for the Project area. Under the provisions of the U.S. Clean Air Act, the Fresno County portion of the SJVAB has been classified as non-attainment/extreme, non-attainment/severe, non-attainment, attainment/ unclassified, attainment, or unclassified under the established National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for various criteria pollutants as summarized in Table 3.4.3-1.

**Table 3.4.3-1
SJVAB Attainment Status**

Pollutant	NAAQS	CAAQS
Ozone – 1 Hour	No Federal Standard ^f	Non-attainment/Severe
Ozone – 8 Hour ^g	Non-attainment/Extreme ^e	Non-attainment
PM ₁₀	Attainment ^c	Non-attainment
PM _{2.5}	Non-attainment ^d	Non-attainment
Carbon Monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen Dioxide	Attainment/Unclassified	Attainment
Sulfur Dioxide	Attainment/Unclassified	Attainment
Lead Particulates	No Designation/Classification	Attainment
H ₂ S	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particulates	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Attainment

Source: Appendix A

In order to maintain consistency with CEQA, the SJVAPCD adopted guidelines to assist applicants in complying with the various requirements. According to the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), a project would have potentially significant air quality impacts when the project:

- Creates a conflict with or obstructs implementation of the applicable air quality plan.
- Causes a violation of any air quality standard or generates a substantial contribution towards exceeding an existing or projected air quality standard.
- Results in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated non-attainment under a NAAQS and CAAQS (including emissions that exceed quantitative thresholds for O₃ precursors).
- Exposes sensitive receptors to substantial pollutant concentrations.
- Creates objectionable odors that affect a substantial number of people.

The SJVAPCD GAMAQI thresholds are designed to implement the general criteria for air quality emissions as required in the CEQA Guidelines, Appendix G, Paragraph III (Title 14 of the California Code of Regulations §15064.7) and CEQA (California Public Resources Code Sections 21000 et al.). SJVAPCD's specific CEQA air quality thresholds are presented in 3.4.3-2 below.

Table 3.4.3-2
SJVAPCD CEQA Thresholds of Significance

Criteria Pollutant	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non-Permitted Equipment and Activities
NO _x	10 tons/yr	10 tons/yr	10 tons/yr
ROG	10 tons/yr	10 tons/yr	10 tons/yr
SO _x	27 tons/yr	27 tons/yr	27 tons/yr
PM ₁₀	15 tons/yr	15 tons/yr	15 tons/yr
PM _{2.5}	15 tons/yr	15 tons/yr	15 tons/yr
CO	100 tons/yr	100 tons/yr	100 tons/yr

Source: Appendix A

Short-term emissions from the construction phases of a project would have temporary impacts on air quality. The construction emissions were based on the default CalEEMod equipment list for the proposed Project's land use type and development intensity, and applying model defaults as well as a conservative analysis approach. In order to be conservative, construction emissions were estimated under the assumption that construction would begin in 2025. The dates entered into the CalEEMod program represent the earliest construction timeline, which would estimate the worst-case emissions as construction equipment technology and emissions improve over time; therefore, all estimated emission totals are conservative and reflect a reasonable and legally sufficient estimate of potential impacts. All construction equipment activity levels assumed were based on CalEEMod default values for type, number of equipment, hours per day, and horsepower.

SJVAPCD's required measures for all projects were applied:

- Water exposed area three times per day.
- Reduce vehicle speed to less than 15 miles per hour on unpaved roads.

Table 3.4.3-3 provides the anticipated Project emissions for short-term construction.

Long-term emissions are caused by operational mobile sources and area source emissions from the Project site. Operation of the Project site at full build-out is not expected to present a substantial source of fugitive dust (PM₁₀) emissions. The main source of PM₁₀ emissions would be from vehicular traffic associated with the Project site.

**Table 3.4.3-3
Short-term Project Emissions**

Emissions Source	Pollutant (tons/year)					
	ROG	NO_x	CO	SO₂	PM₁₀	PM_{2.5}
2025	0.17	1.53	1.70	0.00	0.24	0.13
2026	0.17	1.35	1.91	0.00	0.10	0.06
2027	1.04	0.83	1.23	0.00	0.06	0.03
Maximum Annual Emissions	1.04	1.53	1.91	0.00	0.24	0.13
Significance Threshold	10	10	100	27	15	15
Is threshold exceeded for a single year?	No	No	No	No	No	No

Source: Appendix A

PM₁₀, on its own as well as in combination with other pollutants, creates a health hazard. The SJVAPCD's Regulation VIII establishes required controls to reduce and minimize fugitive dust emissions. The following SJVAPCD Rules and Regulations apply to the proposed Project (and all projects):

- Rule 4102 – Nuisance – prohibits a facility from posing as a nuisance to surrounding receptors and can impose penalties for nuisance issues such as dust, smoke, excess emissions, etc. Compliance with this rule ensures that the area around the Project site will not be adversely impacted by such issues.
- Regulation VIII – Fugitive PM₁₀ Prohibitions – a series of regulations to reduce and/or eliminate the generation of particulate matter (PM) that can adversely impact visibility as well as the health and safety of people on-site or in the vicinity of the Project.
 - Rule 8011 – General Requirements – this rule is to reduce ambient concentrations of fine particulate matter (PM₁₀) by requiring actions to prevent, reduce, or mitigate anthropogenic (human-caused) fugitive dust emissions.
 - Rule 8021 – Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities – restricts generation of airborne dust and visibility impacts from these activities. Places limits on opacity and equipment operation under certain adverse weather conditions.
 - Rule 8041 – Carryout and Trackout – requires that equipment and vehicles leaving the construction site control the amount of dirt, soil, or mud that is tracked off-site and onto public roadways. This helps eliminate or minimize dust generation and opacity degradation.

- Rule 8051 – Open Areas – limits fugitive dust from open areas, i.e., areas on a construction site that are not actively being constructed upon but may generate wind-blown dust.

The Project would comply with applicable SJVAPCD Rules and Regulations and the local zoning codes and General Plan policies.

Project-related transportation activities from residents would generate mobile source ROG, NO_x, SO_x, CO, PM₁₀, and PM_{2.5} exhaust emissions. Exhaust emissions would vary substantially from day to day but would average out over the course of an operational year. The variables factored into estimating total Project emissions include level of activity, site characteristics, weather conditions, and number of visitors. As the Project is not expected to generate an adverse change in current activity levels, substantial emissions are not anticipated. The default trip rates in CalEEMod were used along with an adjusted fleet mix to reflect the SJVAPCD-approved residential fleet mix for the year 2026. The proposed Project is expected to have minimal long-term air quality impacts as shown in Table 3.4.3-4.

**Table 3.4.3-4
Operational Emissions**

Emissions Source	Pollutant (tons/year)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Mitigated Emissions						
Operational Emissions	2.09	0.88	6.04	0.01	1.04	0.29
SJVAPCD Thresholds	10	10	100	27	15	15
Is Threshold Exceeded after Mitigation?	No	No	No	No	No	No

Source: Appendix A

As such, the Project is deemed to have a less-than-significant impact on both construction and operational emissions as they do not exceed thresholds of significance of the regulatory district. Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.3b – Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The Project is within the SJVAB and under the jurisdiction of the SJVAPCD. The adopted Air Quality Attainment Plans for the SJVAB set forth comprehensive programs that will lead the SJVAB into compliance with federal and State ambient air quality standards.

The SJVAPCD's GAMAQI thresholds are designed to implement the general criteria for air quality emissions as required in the CEQA Guidelines, Appendix G, Paragraph III (Title 14 of the California Code of Regulations §15064.7) and CEQA (California PRC Sections 21000 et. al). SJVAPCD's specific CEQA air quality thresholds are presented below.

The proposed Project would be required to comply with all recommended measures for construction activities listed in the GAMAQI, applicable measures set forth in Title 24 of the Uniform Building Code, and applicable SJVAPCD rules.

Short-Term Construction Emissions

The proposed Project includes the construction of a 185-lot single-family subdivision with the associated improvements on an existing 40.6-acre parcel.

The construction emissions were based on the default CalEEMod equipment list for the proposed Project's land use type and development intensity and applying model defaults as well as a conservative analysis approach. Construction emissions were estimated under the assumption that the residential development would begin construction in October 2024. The dates entered into the CalEEMod program represent the earliest construction timeline, which would estimate the worst-case emissions as construction equipment technology and emissions improve over time; therefore, all estimated emission totals are conservative and reflect a reasonable and legally sufficient estimate of potential impacts. All construction equipment activity levels assumed were based on the CalEEMod default values for type and number of equipment and hours per day.

SJVAPCD's required measures for all Projects were also applied:

- Water exposed areas three times per day; and
- Reduce vehicle speed to less than 15 miles per hour.

Table 3.4.3-2 summarizes the anticipated pollutant emissions resulting from the construction of the proposed Project. Development of the proposed Project is anticipated to generate criteria pollutant emissions below SJVAPCD significance threshold levels. As

calculated with CalEEMod, the estimated short-term construction-related emissions for criteria pollutants would not exceed significance threshold levels.

Long-Term Operational Emissions

Long-term emissions are caused by operational mobile, area, and energy sources. Long-term emissions would consist of the following components:

FUGITIVE DUST EMISSIONS

Operation of the Project site at full build-out is not expected to present a substantial source of fugitive dust (PM₁₀) emissions. The main source of PM₁₀ emissions would be from vehicular traffic associated with the Project site.

As discussed in Impact #3.4.3a, PM₁₀, on its own as well as in combination with other pollutants, creates a health hazard. The SJVAPCD's Regulation VIII establishes required controls to reduce and minimize fugitive dust emissions and would be applicable towards the Project.

The Project would comply with applicable SJVAPCD Rules and Regulations, and the local General Plan policies and zoning codes.

EXHAUST EMISSIONS

Project-related transportation activities from residences would generate mobile source ROG, NO_x, SO_x, CO, PM₁₀, and PM_{2.5} exhaust emissions. Exhaust emissions would vary substantially from day to day but would average out over the course of an operational year. The variables factored into estimating total Project emissions include: level of activity, site characteristics, weather conditions, and number of visitors. As the Project is not expected to generate an adverse change in current activity levels, substantial emissions are not anticipated. The trip rates used in CalEEMod were adjusted to reflect Project-specific estimates. Vehicle fleet mix was revised per the approved SJVAPCD residential fleet mix.

PROJECTED EMISSIONS

Operation of the proposed Project is anticipated to generate criteria pollutant emissions below SJVAPCD significance threshold levels, as shown in Table 3.4.3-4 above.

The District's non-attainment status is a result of past and present development within the SJVAB. Furthermore, attainment of ambient air quality standards can be jeopardized by increasing emissions-generating activities in the region. No single project would be sufficient in size by itself to result in non-attainment of the regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development within the San Joaquin Valley Air Basin. When assessing whether there is a new significant cumulative effect, the Lead Agency shall consider whether the incremental effects of the project are cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are

significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects [CCR §15064(h)(1)]. Per CEQA Guidelines §15064(h)(3), a Lead Agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located (QK 2025a).

GAMAQI also states, "If a project is significant based on the thresholds of significance for criteria pollutants, then it is also cumulatively significant. This does not imply that if the project is below all such significance thresholds, it cannot be cumulatively significant." (QK 2025a). Based on the analysis conducted for this Project, it is individually less than significant.

The most recent, certified SJVAB Emission Inventory data available from the SJVAPCD is based on data gathered for the 2020 annual inventory. This data will be used to assist the SJVAPCD in demonstrating attainment of Federal 1-hour O₃ Standards. Table 3.4.3-5 provides a comparative look at the impacts proposed by the Project to the SJVAB Emissions Inventory.

**Table 3.4.3-5
Comparative Analysis Based on SJVAB 2020 Inventory**

Emissions Inventory Source	Pollutant (tons/year)					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Fresno County - 2020	22,593.50	15,549.00	58,911.00	547.50	24,601.00	6,351.00
SJVAB – 2020	113,223.0	71,868.5	232,651.0	2,336.0	99,426.0	25,002.5
Proposed Project	2.09	0.88	6.04	0.01	1.04	0.29
Proposed Project's % of Fresno	0.0093%	0.0057%	0.0103%	0.0018%	0.0042%	0.0046%
Proposed Project's % of SJVAB	0.0018%	0.0012%	0.0026%	0.0004%	0.0010%	0.0012%

Source: (QK 2025a)

The proposed Project does not pose a substantial increase to basin emissions, as such basin emissions would be essentially the same if the Project is approved.

Tables 3.4.3-6, 3.4.3-7, and 3.4.3-8 provide California Air Resources Board (CARB) Emissions Inventory projections for the year 2025 for both the SJVAB and the Fresno County portion of the air basin. Looking at the SJVAB Emissions predicted by the CARB year 2025 emissions inventory, the Fresno County portion of the air basin is a moderate source of the emissions. The proposed Project produces a small portion of the total emissions in both Fresno County and the entire SJVAB.

Table 3.4.3-6
Emission Inventory SJVAB 2025 Projection – Tons per Year

	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Total Emissions	106,434.0	46,428.0	189,690.5	2,263.0	95,265.0	21,571.5
Percent Stationary Sources	28.81%	14.78%	4.06%	77.42%	4.52%	12.01%
Percent Area-Wide Sources	53.94%	5.11%	19.13%	8.06%	90.88%	75.47%
Percent Mobile Sources	17.25%	80.11%	76.81%	12.90%	4.60%	12.69%
Total Stationary Source Emissions	30,660.0	6,862.0	7,701.5	1,752.0	4,307.0	2,591.5
Total Area-Wide Source Emissions	57,414.5	2,372.5	36,281.0	182.5	86,578.0	16,279.0
Total Mobile Source Emissions	18,359.5	37,193.5	145,708.0	292.0	4,380.0	2,737.5

Source: (QK 2025a)

Note: Total may not add due to rounding.

Table 3.4.3-7
Emission Inventory Fresno County 2025 Projection – Tons per Year

	ROG	NOx	CO	SOx	PM ₁₀	PM _{2.5}
Total Emissions	20,914.5	9,818.5	45,734.5	547.5	23,396.5	5,219.5
Percent Stationary Sources	33.16%	16.73%	2.63%	80.00%	2.96%	6.99%
Percent Area-Wide Sources	47.64%	6.32%	25.22%	13.33%	93.14%	83.22%
Percent Mobile Sources	19.37%	76.95%	72.07%	13.33%	3.90%	9.79%
Total Stationary Source Emissions	6,935.0	1,642.5	1,204.5	438.0	693.5	365.0
Total Area-Wide Source Emissions	9,964.5	620.5	11,534.0	73.0	21,790.5	4,343.5
Total Mobile Source Emissions	4,051.5	7,555.5	32,959.5	73.0	912.5	511.0

Source: (QK 2025a)

Note: Total may not add due to rounding.

Table 3.4.3-8
2025 Emissions Projections – Proposed Project, Fresno County and SJVAB

	ROG	NOx	PM ₁₀
Proposed Project	2.09	0.88	1.04
Fresno County	20,914.5	9,818.5	23,396.5
SJVAB	106,434.0	46,428.0	95,265.0
Proposed Project Percent of Fresno County	0.010%	0.009%	0.004%
Proposed Project Percent of SJVAB	0.002%	0.002%	0.001%
Fresno County Percent of SJVAB	19.65%	21.15%	24.56%

As shown above, the proposed Project would pose an inconsequential impact on regional ROG, NOx, and PM₁₀ formation. Therefore, this Project would not be considered cumulatively considerable in its contribution to regional O₃ and PM₁₀ impacts.

Furthermore, the Project does not conflict with or obstruct implementation of an applicable air quality plan or exceed the SJVAPCD's established emissions thresholds and significance thresholds for all CEQA air quality determinations. Therefore, this Project would not pose a significant impact to the SJVAB. The proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard and would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.3c – Would the Project expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors are defined as areas where young children, chronically ill individuals, the elderly, or people who are more sensitive than the general population reside, such as schools, hospitals, nursing homes, and daycare centers. Table 3.4.3-9 lists the known non-residential sensitive receptors within one mile of the Project.

**Table 3.4.3-9
Sensitive Receptors Located < One mile from Project**

Receptor	Type of Facility	Distance from Project (miles)	Direction from Project
Silas Bartsch School	School	0.02	E
Grant Middel School	School	0.51	W
Monte Vista School	School	0.36	SW
Jefferson Elementary School	School	0.44	SW
Mountain View	School	0.51	W
Lincoln Elementary School	School	0.83	W
St. La Salle School	School	0.83	NW
Children's Paradise Daycare	Daycare	0.47	W
Fresno EOC Head Start	Preschool	0.44	SW
KC Kids Preschool	Preschool	0.45	SW
Sierra View Homes	Retirement Community	0.26	W
Reedley Elderly	Retirement Community	0.71	W
Vineyard Care Center	Nursing Home	0.57	SW
United Health Centers	Medical Center	0.26	N
Adventist Health	Medical Center	0.49	SW
Family Healthcare	Medical Center	0.63	NW

GAMAQI recommends that Lead Agencies consider situations wherein a new or modified source of hazardous air pollutants (HAP) is proposed for a location near an existing residential area or other sensitive receptor when evaluating potential impacts related to HAPs.

The proposed Project would result in emissions of HAPs during construction and would be located near existing residents; therefore, an assessment of the potential risk to the population attributable to emissions of hazardous air pollutants from the proposed Project is required.

To predict the potential health risk to the population attributable to emissions of HAPs from the proposed Project, ambient air concentrations were predicted with dispersion modeling to arrive at a conservative estimate of increased individual carcinogenic risk that might occur as a result of continuous exposure over the construction period. Similarly, predicted concentrations were used to calculate non-cancer chronic and acute hazard indices (HI), which are the ratio of expected exposure to acceptable exposure. The basis for evaluating potential health risk is the identification of sources with increased HAPs. HAP emissions from anticipated diesel construction equipment were evaluated.

Health risk is determined using the Hotspots Analysis and Reporting Program (HARP2) software distributed by the CARB; HARP2 requires peak 1-hour emission rates and annual-averaged emission rates for all pollutants for each modeling source. Assumptions used to calculate the emission rates for the proposed Project, with the full analysis and calculation, are outlined in Appendix A. The potential maximum impacts predicted by HARP2 are shown in the table below.

Table 3.4.3-10
Potential Maximum Impacts Predicted by HARP

	Cancer Risk	Chronic Hazard Index
Construction	12.3E-06	6.43E-03
SJVAPCD Threshold	20.0E-06	1.0
Exceedance?	No	No
Receptor #	302	302
UTM Easting (m)	282976.61	282976.61
UTM Northing (m)	4053035.62	4053035.62

Note: UTM = Universal Transverse Mercator

The maximum predicted cancer risk for the proposed Project is 12.3E-06. The maximum chronic non-cancer hazard index for the proposed Project is 6.43E-03. Since the PMI remained below the significance threshold for cancer and chronic risk, this Project would not have an adverse effect to any of the surrounding communities.

The potential health risk attributable to the proposed Project is determined to be less than significant based on the following conclusions:

- Potential carcinogenic risk from the proposed Project is below the significance level of twenty in a million at each of the modeled receptors.
- The hazard index for the potential chronic non-cancer risk from the proposed Project is below the significance level of 1.0 at each of the modeled receptors.
- The hazard index for the potential acute non-cancer risk was not calculated since there is no acute risk associated with DPM emission; therefore, the proposed Project is considered below the significance level.

Therefore, potential risk to the population attributable to emissions of HAPs from the proposed Project would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.3d – Would the Project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?

The SJVAPCD's GAMAQI states, "An analysis of potential odor impacts should be conducted for both of the following two situations:

1. Generators – Projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, and
2. Receivers – residential or other sensitive receptor Projects or other Projects built for the intent of attracting people locating near existing odor sources."

The GAMAQI also states, "The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley Air Basin. These are presented in Table 6 (Screening Levels for Potential Odor Sources), along with a reasonable distance from the source within which the degree of odors could possibly be significant. [Table 6] can be used as a screening tool to qualitatively assess a Project's potential to adversely affect area receptors." (San Joaquin Valley Air Pollution Control District 2015). Because the Project is a residential development and the anticipated activities for the Project site are not listed in Table 6 of the GAMAQI as a source that would create objectionable odors, the Project is not expected to be a source of objectionable odors.

Based on the provisions of the SJVAPCD's GAMAQI, the proposed Project would not exceed any screening trigger levels to be considered a source of objectionable odors or odorous compounds (San Joaquin Valley Air Pollution Control District 2015). Furthermore, there does not appear to be any significant source of objectionable odors in close proximity that may adversely impact the Project site when it is in operation. Additionally, the Project

emissions estimates indicate that it would not be expected to adversely impact surrounding receptors. As such, the proposed Project would not be a source of any odorous compounds nor would it likely be impacted by any odorous source. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.4 - BIOLOGICAL RESOURCES

Would the Project:

a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f.	Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

Impact #3.4.4a – Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

A reconnaissance survey of the Project and a 500-foot buffer (Biological Survey Area, or BSA), where feasible, was conducted by qualified biologists on January 23, 2024. The purpose of the survey was to determine the locations and extent of sensitive plant communities and habitats, determine the potential for the occurrence of special-status plant and wildlife species, and identify other sensitive biological resources within the BSA. Meandering pedestrian transects were walked through the BSA to achieve 100 percent visual coverage with the aid of binoculars in areas that were inaccessible. Locations of any observed sensitive biological resources were documented. Photographs were taken to document the existing landscape and sensitive biological resources. Detailed notes of plant and wildlife species and site conditions observed were taken while conducting the survey.

A review of the literature and agency databases was conducted to obtain information on the occurrences of natural communities and special-status species known from the vicinity of the Project site. The California Natural Diversity Database (CNDDDB), the California Native Plant Society (CNPS) Database, and the U.S. Fish and Wildlife Service (USFWS) Information for Planning (IPaC) threatened and endangered species list were reviewed. To satisfy other standard search criteria, CNDDDB records within a 10-mile radius of the Project site and the surrounding nine USGS quadrangles for the IPaC search were queried.

Site Conditions

The Project site is situated on a 34-acre citrus orchard that has been routinely maintained and currently consists of weedy vegetation growing on the ground. Due to the lack of suitable habitat and the disturbed condition of the Project site, protocol surveys for specific special-status plant species was not warranted.

Non-native plant communities occur within the BSA. The Project site consists of a partially maintained citrus tree (*Citrus x sinensis*) orchard and is currently vegetated with ruderal species, mainly Mediterranean grass (*Schismus barbatus*), along field margins. Ruderal and ornamental species such as cocklebur (*Xanthium strumarium*), curly dock (*Rumex crispus*), ripgut brome (*Bromus diandrus*), olive tree (*Olea europaea*), and red-stem filaree (*Erodium cicutarium*), which are located outside of the Project site but within the BSA.

Special-Status Plant Species

There were 16 special-status plant species identified in the literature and database review that are known or have the potential to occur within the surrounding nine quadrangles centered on the Project site. Four of these species, Hoover's spurge (*Euphorbia hooveri*), San Joaquin Valley Orcutt grass (*Orcuttia inaequalis*), San Joaquin adobe sunburst (*Pseudobahia peirsonii*), and Greene's tuctoria (*Tuctoria greenei*) are federally and State listed. None of the special-status plant species has historical records occurring on the BSA or is expected to occur due to the lack of suitable habitat on the BSA.

No special-status plant species were present within the BSA. The survey coincided with some, but not all, of the plant species' optimal blooming periods. None of the species identified in the CNDDDB or IPaC database queries are expected to occur on-site due to the

lack of suitable habitat conditions and/or because the BSA is located outside of the species' known range. The Project site is degraded from historical agricultural use, and the adjacent lands have been equally disturbed for residential and transportation corridors.

Special-Status Wildlife Species

There were 19 special-status wildlife species identified in the literature and database review that are known or have the potential to occur within the surrounding nine-quad search area centered on the Project (Table 3.4.4-2). There are no historical records from the CNDDDB or IPaC of any special-status wildlife species within the BSA.

Table 3.4.4-1
Special-Status Plant Species Occurring in the Region of the BSA

Scientific Name	Common Name	Federal Status	State Status	CRPR Status	Potential to Occur	Rational
<i>Atriplex cordulata</i> var. <i>erecticaulis</i>	Earlimart orache	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Atriplex depressa</i>	brittlescale	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Atriplex minuscule</i>	lesser saltscall	-	-	1B.1	No	No suitable habitat is present within the BSA.
<i>Carex comosa</i>	bristly sedge	-	-	2B.1	No	No suitable habitat is present within the BSA.
<i>Delphinium recurvatum</i>	recurved larkspur	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Eryngium spinosepalum</i>	spiny-sepaled button-celery	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Euphorbia hooveri</i>	Hoover's spurge	FT	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Helianthus winteri</i>	Winter's sunflower	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Imperata brevifolia</i>	California satintail	-	-	2B.1	No	No suitable habitat is present within the BSA.
<i>Lasthenia chrysantha</i>	alkali-sink goldfields	-	-	1B.1	No	No suitable habitat is present within the BSA.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	-	-	1B.1	No	No suitable habitat is present within the BSA.

Scientific Name	Common Name	Federal Status	State Status	CRPR Status	Potential to Occur	Rational
<i>Orcuttia inaequalis</i>	San Joaquin Valley Orcutt grass	FT	SE	1B.1	No	No suitable habitat is present within the BSA.
<i>Pseudobahia peirsonii</i>	San Joaquin adobe sunburst	FT	SE	1B.1	No	No suitable habitat is present within the BSA.
<i>Puccinellia simplex</i>	California alkali grass	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	-	-	1B.2	No	No suitable habitat is present within the BSA.
<i>Tuctoria greenei</i>	Greene's tuctoria	FE	SR	1B.1	No	No suitable habitat is present within the BSA.
<u>CRPR (California Rare Plant Rank):</u>				<u>Federal Ranking</u>		
1A	Presumed Extinct in California			FE	Federally Endangered	
1B	Rare, Threatened, or Endangered in California and elsewhere			FT	Federally Threatened	
2A	Plants presumed extirpated in California, but more common elsewhere			<u>State Ranking</u>		
2B	Plants Rare, Threatened, or Endangered in California, but more common elsewhere			SE	State Endangered	
				ST	State Threatened	
				SCE	State Candidate Endangered	
				SCT	State Candidate Threatened	
<u>CRPR Threat Code Extension:</u>				SFP	State Fully Protected	
.1	Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)			SR	State Rare	
.2	Fairly endangered in California (20-80% occurrences threatened)			SSC	State Species of Special Concern	
.3	Not very endangered in California (<20% of occurrences threatened)					

Table 3.4.4-1
Special-Status Wildlife Species Occurring in the Region of the BSA

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Potential to Occur	Rationale
Invertebrates						
<i>Bombus crotchii</i>	Crotch's bumblebee	-	SCE	-	No	Suitable habitats including grassland and scrub habitats with abandoned rodent burrows are absent from the BSA.
<i>Branchinecta lynchi</i>	vernal pool fairy shrimp	FT	-	-	No	Suitable habitat, vernal pools, are absent from the BSA.
<i>Danaus plexippus</i>	monarch butterfly	FC	-	-	No	Suitable habitats including fields, meadows, weedy areas, marshes, and roadsides are absent from the BSA.

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Potential to Occur	Rationale
<i>Desmocerus californicus dimorphus</i>	valley elderberry longhorn beetle	FT	-	-	No	Suitable host plants (i.e., elderberry shrub [<i>Sambucus</i> sp.]) are absent from the BSA.
<i>Lepidurus packardii</i>	vernal pool tadpole shrimp	FE	-	-	No	Suitable habitat, ephemeral wetlands, are absent from the BSA.
Amphibians						
<i>Ambystoma californiense</i> pop 1	California tiger salamander central California DPS	FT	ST	WL	No	Suitable breeding ponds (i.e., ephemeral pools or artificial ponds), or upland habitat with small mammal burrows for aestivating are present within the BSA.
<i>Rana boylei</i>	foothill yellow-legged frog - south Sierra DPS	FE	FE	-	No	Suitable habitat is absent from the BSA. No streams or rivers with rock substrates and isolated pools within forest, chaparral, or woodland habitat is present.
<i>Lithobates pipiens</i>	Northern leopard frog	-	-	SSC	No	Suitable habitat is absent from the BSA. No aquatic habitats with permanent or semi-permanent water is present.
<i>Spea hammondi</i>	western spadefoot	FPT	-	SSC	No	Suitable habitat is absent from the BSA. No vernal pools for breeding or open areas within grasslands, coastal scrub, woodlands, chaparral, sandy washes lowland river floodplains, alkali flats, foothills, or mountains with sand or gravelly soils are present within the BSA.
Reptiles						
<i>Actinemys marmorata</i>	northwestern pond turtle	FPT	-	SSC	No	Suitable habitat is absent from the BSA. No ponds, lakes, rivers, streams, creeks,

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Potential to Occur	Rationale
						marshes, or irrigation ditches with vegetation and rocky or muddy bottoms are present within the BSA.
Birds						
<i>Gymnogyps californianus</i>	California condor	FE	-	-	No	Suitable nesting habitat is absent from the BSA. The BSA is outside the preferred elevation range for nesting and no cliff habitat is present. The species is known to fly several hundred miles in a single day to forage; however, due to the size the Project it is highly unlikely for the species to forage within the BSA.
<i>Athene cunicularia ssp. hypugaea</i>	western burrowing owl	-	SCE	SSC	Yes	There is suitable grassland habitat present within the BSA. Non-native grassland habitat is present along the northeast and eastern boundaries of the BSA. A potential prey item, California ground squirrel sign (i.e., burrows, scat) was identified within the BSA.
<i>Lanius ludovicianus</i>	loggerhead shrike	-	-	SSC	Yes	One adult individual was observed during the survey within the BSA. Suitable nesting and foraging habitat are present within the BSA. There are several smaller ornamental trees to the west and north that may be suitable nesting habitat.
<i>Buteo swainsoni</i>	Swainson's hawk	-	ST		Yes	There is suitable foraging habitat within the BSA, specifically California ground

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Potential to Occur	Rationale
						squirrel burrows and other smaller rodent burrows that could provide shelter for prey items (i.e., ground squirrels, mice, gophers, etc). There is no suitable nesting habitat within the Project site; however, suitable nesting habitat is present within the BSA. Existing large ornamental trees are located on the western boundary of the BSA.
<i>Coccyzus americanus</i>	western yellow-billed cuckoo	FT	SE	-	No	No suitable habitat is present within the BSA. No riparian woodlands along larger rivers systems are present within the BSA.
Mammals						
<i>Antrozous pallidus</i>	pallid bat	-	-	SSC	No	No suitable foraging or roosting habitat within the BSA.
<i>Eumops perotis californicus</i>	western mastiff bat	-	-	SSC	No	No suitable foraging or roosting habitat within the BSA.
<i>Dipodomys nitratooides exilis</i>	Fresno kangaroo rat	FE	SE	-	No	Suitable habitat is absent from the BSA. No alkali desert scrub or open grassland with alkaline clay soils are present within the BSA.
<i>Vulpes macrotis mutica</i>	San Joaquin kit fox	FE	ST	-	No	Denning and foraging habitat that could support this species is present within the BSA. There have been no recent sightings of San Joaquin kit fox activity within Fresno County in several years.
Notes:						
<u>CRPR (California Rare Plant Rank):</u>				<u>Federal Ranking</u>		
1A Presumed Extinct in California				FE	Federally Endangered	
1B Rare, Threatened, or Endangered in California and elsewhere				FT	Federally Threatened	

Scientific Name	Common Name	Federal Status	State Status	CDFW Status	Potential to Occur	Rationale
2A	Plants presumed extirpated in California, but more common elsewhere			FPT		Federally Candidate Threatened
2B	Plants Rare, Threatened, or Endangered in California, but more common elsewhere			SE		State Endangered
				ST		State Threatened
	<u>CRPR Threat Code Extension:</u>			SCE		State Candidate Endangered
.1	Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat)			SCT		State Candidate Threatened
.2	Fairly endangered in California (20-80% occurrences threatened)			SFP		State Fully Protected
.3	Not very endangered in California (<20% of occurrences threatened)			SSC		State Species of Special Concern

Of the 19 special-status species listed above that have the potential to occur in the region, only three species have the potential to nest or forage on site: the western burrowing owl (*Athene cunicularia ssp. hypugaea*), loggerhead shrike (*Lanius ludovicianus*), and Swainson's hawk (*Buteo swainsoni*). The remaining 16 species do not have the potential to occur because the site is outside of their known range, does not contain suitable nesting or foraging habitat, lacks a permanent water source, and is subject to other environmental limitations.

There are several large eucalyptus and various ornamental trees that could support nesting birds and/or raptors on and near the Project site. No inactive or active stick nests were identified during the survey; however, several raptors were identified, including red-shouldered hawk (*Buteo lineatus*), red-tailed hawk (*Buteo jamaicensis*), sharp-shinned hawk (*Accipiter striatus*), and American kestrel (*Falco sparverius*). Smaller ornamental trees associated with the private residences surrounding the Project site could support nesting passerine bird species. Common migratory bird species observed during the survey included mourning dove (*Zenaida macroura*), American crow (*Corvus brachyrhynchos*), and northern mockingbird (*Mimus polyglottos*).

No small mammal burrows suitable for special-status species were present within the BSA. There was sign (i.e., weathered soil mounding) created by pocket gopher (*Thomomys bottae*) present within on the Project site. There were several ground squirrels (*Otospermophilus beecheyi*) burrows with sign (i.e., tracks and exploratory digging) on the apron of the burrows within the BSA.

WESTERN BURROWING OWL

There is no suitable nesting habitat on the Project site itself, but the open non-native grassland to the northeast and east within the BSA provides suitable nesting and foraging habitat for the species. Several California ground squirrel burrows were observed on the Project site and could shelter suitable prey species for the species, resulting in a minimal amount of suitable nesting habitat on the Project site. However, this species is very sensitive to human activities and noise, and the built-up and urban characteristics of the surrounding area limit the potential for the burrowing owl to inhabit the site. Additionally, there is a limited prey base available to support the burrowing owl, and the surrounding habitat provides minimal foraging or nesting opportunities.

Although impacts to this species are unlikely, to minimize the potential impacts to nesting and foraging western burrowing owls, implementation of Mitigation Measures (MM) BIO-1, MM-BIO-3 through MM-BIO-5, and MM-BIO-7 would reduce any impacts to the species to below significant levels. MM BIO-1 requires that a preconstruction survey be conducted 14 days prior to Project activities, MM BIO-3 through BIO-5 establishes procedures to be implemented should a western burrowing owl be observed during the preconstruction survey, and MM BIO-7 requires that a qualified biologist conduct a training program for all construction personnel prior to Project activities.

LOGGERHEAD SHRIKE

One adult loggerhead shrike was observed during the survey within the BSA. Suitable nesting and foraging habitat are present within the BSA but not within the Project site itself. There are several smaller ornamental trees to the west and north that may be suitable nesting habitat for the species.

Impacts to nesting and foraging loggerhead shrikes could occur during construction due to noise, vibration, direct mortality from vehicle strikes, and the presence of construction works, which may alter normal behaviors and possibly lead to nest failure. Implementation of MM BIO-1 (preconstruction survey), MM-BIO-2 requiring preconstruction surveys for active raptor and migratory bird nests between February 1 and September 15, MM-BIO-5 requiring daily site visits for any nest near construction activities, and MM-BIO-7 (construction personnel training) would reduce any impacts to the species to below significant levels.

SWAINSON'S HAWK

The Swainson's hawk (*Buteo swainsoni*) has the potential to occur within the BSA but is unlikely to be found on the Project site itself. There is no suitable nesting habitat on the Project site, although there are several large eucalyptus trees in the BSA that could provide suitable nesting habitat. Suitable foraging habitat is absent from the Project site, but there are open non-native grasslands to the northeast and east of the BSA that could support the species. Several ground squirrel and pocket gopher burrows indicate the potential for a limited prey base in the immediate vicinity. The prey base for this species is low, given the urban and built-up characteristics of the surrounding properties, and the area would be considered of low foraging quality.

However, to minimize potential impacts to Swainson's hawks that could occur during construction due to noise, vibration, and the presence of construction workers, implementation of MM-BIO-1 (preconstruction survey), MM-BIO-2 (nesting bird preconstruction survey), MM-BIO-5 through BIO-7 (site visits for any nests near construction, protocol surveys for Swainson's hawk, construction personnel training) would reduce any impacts to the species to below significant levels.

NESTING BIRDS

There were no nests (active or inactive) present within the BSA during the survey. Habitat to support nesting birds is limited to ornamental trees located within the BSA and the surrounding urban development, which may support passerine nests or larger raptor nests. Due to the periodic orchard maintenance, it is unlikely that ground-nesting species would nest within the BSA. Additionally, there are a variety of man-made structures (utility poles, transmission towers, agricultural residences, etc.) and trees within the BSA and in the vicinity of the Project, which could support a variety of nesting bird species. If there are active nests present during Project activities, nests could be impacted, and Project activities could interfere with normal breeding behaviors, which could discourage breeding or lead to nest abandonment or failure. Implementation of MM BIO-1 (preconstruction survey), MM BIO-2 (nesting bird preconstruction survey), and MM BIO-7 (construction personnel training) would reduce impacts to these species to below significant levels.

MITIGATION MEASURE(S)

MM BIO-1: A preconstruction clearance survey shall be conducted within 14 days prior to the issuance of grading permits or ground disturbance activities to determine if special-status species are present within 250 feet of the Project. The focal species shall include the western burrowing owl, loggerhead shrike, and Swainson's hawk. A copy of the report outlining the results of the survey shall be submitted to the lead agency as evidence of compliance.

MM BIO-2: If construction activities occur between February 1 and September 15, pre-disturbance surveys for active raptor and migratory bird nests must be conducted no more than 10 days prior to the commencement of disturbance. Surveys shall follow USFWS and CDFW guidance and/or protocols, as applicable. If no active nests or nesting birds are identified, then Project construction activities may proceed, and no further mitigation measures for nesting birds are required. If active nest(s) are identified, the active nest(s) should be continuously surveyed for the first 24 hours after detection to establish a behavioral baseline prior to any construction-related activities.

Once construction commences, all nests shall be continuously monitored to detect any behavioral changes because of the Project (i.e., nest avoidance or abandonment). If behavioral changes are observed, the work causing that change shall cease until the applicant's qualified biologist consults with the CDFW and/or the USFWS, and the qualified biologist used by the applicant implements the recommended measures. During such times as the qualified biological monitor is not on site while construction workers are on site, a minimum non-disturbance buffer of 250 feet shall be established around active nests and a 500-foot no-disturbance buffer around the nests of raptors until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, and any adult birds are no longer occupying the nest. Deviations from these no-disturbance buffers may be implemented if the qualified biologist concludes that work within the buffer area would not cause nest avoidance or abandonment (e.g., when the disturbance area would be concealed from a nest

site by topography) provided that notification of this determination of a deviation in the no-disturbance buffer is provided by the qualified biologist no less than 15 days in advance to the California Department of Fish and Wildlife and the United States Fish and Wildlife.

MM BIO-3: Because there is potential for the western burrowing owl to occur within or near the Project area, Project-related vehicles shall observe a daytime speed limit of 20 mph throughout the site in all Project areas, except on County roads and State and federal highways; this is particularly important at night when western burrowing owls are most active. Although not anticipated for this Project, nighttime construction shall be minimized to the extent possible. However, if night construction shall occur, then the speed limit shall be reduced to 10 mph. Off-road traffic outside of designated Project areas shall be prohibited.

- a. To prevent inadvertent entrapment of wildlife during the construction phase of a Project, all excavated, steep-walled holes or trenches greater than 2-feet deep shall be covered at the close of each working day by plywood or similar materials. If the trenches cannot be covered, one or more escape ramps constructed of earthen-fill or wooden planks shall be installed. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped wildlife.
- b. Western burrowing owls are attracted to burrow-like structures such as pipes and may enter stored pipes and become trapped or injured. All construction pipes, culverts, or similar structures with a diameter of 4-inches or greater stored at a construction site for one or more overnight periods shall be thoroughly inspected for western burrowing owl before the pipe is subsequently buried, capped, or otherwise used or moved in any way.
- c. All food-related trash items such as wrappers, cans, bottles, and food scraps shall be disposed of in securely closed containers and removed at least once a week from the Project site.
- d. No pets, such as dogs or cats, shall be brought onto the Project site by workers to prevent harassment, mortality of western burrowing owls, or destruction of burrows.
- e. Use of rodenticides and herbicides on the Project site shall be restricted. This is necessary to prevent primary or secondary poisoning of western burrowing owls and the depletion of prey populations on which they depend. All uses of such compounds shall observe label and other restrictions mandated by the U.S. Environmental Protection Agency, California Department of Food and Agriculture, and other State and federal legislation, as well as additional Project-related restrictions deemed necessary by the Service. If rodent control must be conducted, zinc phosphide shall be used because of a proven lower risk to wildlife.
- f. A representative shall be appointed by the Project proponent or contractor who shall be the contact source for any employee or contractor who might observe a western burrowing owl. The representative will be identified during the employee education

program and his or her name and telephone number shall be provided to the designated biologist.

- g. An employee education program shall be conducted for any Project that has anticipated impacts to western burrowing owls, Swainson's hawks, loggerhead shrike, or other special-status species. The program shall consist of a brief presentation by persons knowledgeable in western burrowing owl biology and legislative protection to explain endangered species concerns to contractors, their employees, and military and/or agency personnel involved in the Project. The program shall include the following: A description of the western burrowing owl, Swainson's hawk, and loggerhead shrike and their habitat needs; a report of the occurrence of these species within the Project Area; an explanation of the status of the species and its protection under the Endangered Species Act; and a list of measures being taken to reduce impacts to the species during Project construction and implementation. A fact sheet conveying this information shall be prepared for distribution to the previously referenced people and anyone else who may enter the Project area.
- h. In the case of trapped animals, escape ramps or structures shall be installed immediately to allow the animal(s) to escape.
- i. New sightings of western burrowing owls, Swainson's hawks, or loggerhead shrikes shall be reported to the California Natural Diversity Database (CNDDB).

MM BIO-4: If burrows supporting the western burrowing owl are discovered during the pre-activity surveys conducted under BIO-1, the avoidance buffers outlined below shall be established. No work would occur within these buffers unless the designated biologist approves and monitors the activity.

Disturbance Buffers for Western Burrowing Owl Nesting Sites

Time of Year	Level of Disturbance (meters)		
	Low	Medium	High
April 1 – Aug 15	200	500	500
Aug 16 – Oct 15	200	200	500
Oct 16 – Mar 31	50	100	500

MM BIO-5: When an active western burrowing owl or raptor nest is identified, and when construction activities occur within the avoidance buffer of the nest, a qualified biologist shall conduct a daily site visit to observe all construction-related activities and activity near an active nest. If construction activities are not occurring within the avoidance buffer of a den or nest, these resources should conduct a weekly site visit to observe activity near an active nest. The qualified biologist should be familiar with all potential species and their sign (i.e., tracks, scat, etc.) that have the potential to occur within the proposed Project Area. The qualified biologist will prepare a daily datasheet to record all construction-related activities

that occurred and activity at an active nest or den, and document the progress of the Project with photographs.

MM BIO-6: If construction work occurs after August 30 and ends before March 1 (outside of the breeding season), impacts to the Swainson's hawk would be avoided. Surveys would not be required for work conducted during this part of the year, and no further mitigation for nest disturbance is required.

- a. Protocol Surveys. For work that begins between March 1 and August 30, a qualified biologist with expertise in Swainson's hawk shall conduct protocol surveys of potential nesting habitat within 0.5 miles of any construction activities prior to initiation of such activities. The Project applicant shall conduct a protocol-level survey in conformance with the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley," Swainson's Hawk Technical Advisory Committee (TAC) (<https://www.wildlife.ca.gov/conservation/survey-protocols#377281284-birds>) (May 31, 2000), hereby incorporated by reference. This protocol prescribes minimum standards for survey equipment, mode of survey, angle and distance to tree, speed, visual and audible clues, distractions, notes and observations, and timing of surveys.

A written report with the pre-construction survey results must be provided to the Planning Department and CDFW within 30 days of the commencement of construction-related activities. The report shall include: the date of the report, authors and affiliations, contact information, introduction, methods, study location, including a map, results, discussion, and literature cited.

If the required protocol surveys show there are no active Swainson's hawk nests within 0.5 miles of construction activities, then no further mitigation for nest disturbance will be required. If protocol surveys show that there are no active Swainson's hawk nests within 10 miles of the site, then no further mitigation for foraging impacts will be required.

- b. Nest Avoidance. If nesting Swainson's hawks are observed within 0.5 miles of the Project site during the protocol surveys, the Project applicant must implement CDFW pre-approved mitigation measures to avoid nest impacts during construction. These measures include:
 - All Project-related activities with the potential to cause nest abandonment or forced fledging of young shall be avoided until the young have fledged.
 - If disturbances, habitat conversions, or other Project-related activities that may cause nest abandonment or forced fledging are necessary, within the nest protection buffer zone (0.5-mile), monitoring of the nest site by a qualified raptor biologist, funded by the Project applicant, shall be required to determine if the nest is abandoned. If the nest is abandoned, but the nestlings are still alive, the

Project proponent is required to fund the recovery and hacking, that is, the controlled release of captive-reared young, of the nestling.

- The Project applicant shall be required to coordinate with CDFW to determine if Project activities with the potential to cause disturbance to nesting Swainson's hawks within the 0.5-mile buffer may proceed with a reduced nest buffer and an approved biological monitor. CDFW may authorize a reduced nest buffer with the presence of a monitoring biologist during construction activities to ensure that the nest is not disturbed. Routine disturbances such as agricultural activities, commuter traffic, and routine maintenance activities within 0.5 miles of an active nest are not prohibited.

MM BIO-7: Prior to the initiation of construction activities, all construction personnel shall attend a Worker Environmental Awareness Training program developed by a qualified biologist. Any personnel associated with construction that did not attend the initial training shall be trained by the authorized biologist or authorized construction personnel prior to working within the Project area. Any employee responsible for the operations, maintenance, or decommissioning of Project facilities shall attend the Worker Environmental Awareness Training program prior to starting work on the Project. All on-site workers shall attend training on an annual basis. The Program shall be developed and presented by the Project's qualified biologist(s) or designee approved by the qualified biologist(s). The program shall include information about the life histories of State or federally listed species with potential to occur in the Project area, their legal status, course of action should these species be encountered on-site, and avoidance and minimization measures to protect these species. The training shall include the following components:

- a. Information about the life history and identification of federally listed plant and wildlife species, as well as other special-status plant and wildlife species that may be affected by Project activities. The program shall present the legal protection status of each such species, the definition of "take" under the Federal Endangered Species Act and California Endangered Species Act, measures the Project proponent/operator shall implement to protect the species, reporting requirements, specific measures for workers to avoid take of special-status plant and wildlife species, and penalties for violation of Project permits or other Project-related environmental measures.
- b. An acknowledgement form signed by each worker indicating that the Worker Environmental Awareness Training and Education program has been completed shall be kept on file at the construction site.
- c. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the Worker Environmental Awareness Training and Education program, and signed acknowledgement forms, shall be submitted to the contractor's construction manager or on-site superintendent.

- d. A copy of the training transcript, training video or informational binder for specific procedures shall be kept available for all personnel to review and be familiar with, as necessary.
- e. The construction crews and contractor(s) shall be responsible for preventing unauthorized impacts from Project activities to sensitive biological resources that are outside the areas defined as subject to impacts by Project permits. Unauthorized impacts may result in Project stoppage, and/or fines depending on the impact and coordination with the appropriate State or federal biological agency.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.4b – Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Sensitive natural communities are designated by various resource agencies, including the California Department of Fish and Wildlife (CDFW), USFWS, Bureau of Land Management (BLM), U.S. Forest Service (USFS), or are designated by local agencies through policies, ordinances, and regulations.

There is no riparian habitat or sensitive natural communities within the Project boundaries, and no protected habitats were observed during the survey. Therefore, there would be no impacts.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.4c – Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The U.S. Army Corps of Engineers (USACE) has regulatory authority over the Clean Water Act (CWA), as provided for by the Environmental Protection Agency (EPA). The USACE has established specific criteria for the determination of wetlands based on the presence of wetland hydrology, hydric soils, and hydrophilic vegetation. There are no federally protected wetlands or vernal pools that occur within the Project.

Wetlands, streams, reservoirs, sloughs, and ponds typically meet the criteria for federal jurisdiction under Section 404 of the CWA and State jurisdiction under the Porter-Cologne Water Quality Control Act. Streams and ponds typically meet the criteria for State jurisdiction under Section 1602 of the California Fish and Game Code. There are no identified water features, federal waters, or wetlands located on or near the Project, and there would be no impacts.

The National Wetlands Inventory (NWI) and National Hydrography Dataset (NHD) did not identify any features within the Project site. The biological survey did not identify any other features on or near the Project that would meet the criteria for either federal or State jurisdiction. However, the Buttonwillow Ditch, which is identified as a blueline running along the westerly site boundary, will be underground according to City requirements. No jurisdictional delineation of the ditch was completed. A delineation meeting State and federal requirements would be conducted to determine if the ditch meets the criteria for either federal or State jurisdiction. MM BIO-8 requires a delineation and a formal notification of the project to be submitted to the pertinent regulatory agencies prior to the issuance of grading permits. In the event drainage is jurisdictional, additional permitting with the appropriate regulatory agencies is also required prior to construction activities. With the implementation of MM BIO-8, the impact of the project related to water features would be less than significant.

Accordingly, there are no wetlands or Waters of the U.S. occurring on the Project site. There would be no impact to Federally or State protected wetlands or waterways as a result of the proposed Project. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

MM BIO-8: Prior to the issuance of any grading or building permit, the Project proponent/developer shall conduct a delineation of the Buttonwillow Ditch, and prepare an Aquatic Resources Delineation Report (ARDR). The ARDR shall be submitted with a formal notification to the US Army Corps of Engineers (ACOE), Water Resources Control Board (SWRCB), and California Department of Fish and Wildlife (CDFW). If no comments or requests for additional permitting are received by the agencies, no further action is necessary. A copy of all correspondence shall be submitted to the lead agency.

If a regulatory agency comments or requests additional permitting, the following actions may be taken. A copy of all correspondence and subsequent permitting and/or reports shall be made available to the Lead Agency. The report shall include information as shown below, as a plan if necessary, and shall outline compliance with the following:

- a. Delineation of all jurisdictional features at the project site. Potential jurisdictional features within the project boundary identified in the jurisdictional delineation report may be shown in plan form.
- b. If the Project has a potential to directly or indirectly impact jurisdictional aquatic resources, a formal aquatic resource delineation of these areas shall be performed by

a qualified professional to determine the extent of agency jurisdiction and permits/authorizations from the appropriate regulating agencies (Central Valley Regional Water Quality Control Board (RWQCB), CDFW and US Army Corps of Engineers (USACE) shall be obtained prior to disturbance to jurisdictional features.

If it is determined that drainage is jurisdictional and cannot be avoided, the Project proponent shall obtain a Section 401 Water Quality Certification from the RWQCB, a Section 404 permit from USACE, and a Lake and Streambed Alteration Agreement under Section 1602 from the CDFW, if required, prior to impacting any waters.

As part of these authorizations, compensatory mitigation may be required by the regulating agencies to offset the loss of aquatic resources. If so, and as part of the permit application process, a qualified professional shall draft a Mitigation and Monitoring Plan to address implementation and monitoring requirements under the permit to ensure that the Project would result in no net loss of habitat functions and values. The Plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The Plan shall be approved by the appropriate regulating agencies, and compensatory mitigation shall take place either on-site or at an appropriate off-site location.

- c. Any material/spoils generated from project activities containing hazardous materials shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Protection measures should follow project-specific criteria as developed in a Stormwater Pollution Prevention and Protection Plan (SWPPP).
- d. Equipment containing hazardous liquid materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and at least 50 feet outside the delineated boundary of jurisdictional water features.
- e. Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative shall be notified.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.4d – Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement corridors, also referred to as dispersal corridors or landscape linkages, are generally defined as linear features along which animals can travel from one habitat or resource area to another. Wildlife movement corridors can be large tracts of land that connect regionally important habitats that support wildlife in general, such as stopover habitats that support migrating birds or large contiguous natural habitats that support animals with very large home ranges (e.g., coyotes, mule deer). They can also be small-scale movement corridors, such as riparian zones, that provide connectivity and cover to support the movement at a local scale.

The BSA is not within any designated wildlife linkage or movement corridors. The Project is situated within an area developed for urban and agricultural use and does not provide a linkage between suitable natural habitats for most wildlife species. Due to the disturbed condition of the Project and the surrounding area, there is no substantial movement of wildlife onto or off the BSA, and there would be no impacts.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.4e – Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The General Plan contains policies aimed at the preservation of biological resources and promotes coordination with federal and State resource agencies. These policies include:

- COSP 4.13C: As feasible, preserve native vegetation and protected wildlife, habitat areas, and vegetation, through avoidance, impact mitigation, and habitat enhancement.
- COSP 4.13.4: As part of the environmental review of new development projects:
 - a) Biological studies shall be prepared to assess habitat value when determined appropriate by the Community Development Department.
 - b) Mitigation shall be applied to assure that degradation of habitat or impacts to sensitive species is reduced or eliminated.
 - c) Input will be sought from agencies and individuals with expertise in biological resources, including the California Department of Fish and Game, California

Water Quality Control Board, U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and U.S. Environmental Protection Agency.

There are no impacts with respect to local policies and ordinances, and no mitigation measures are warranted.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.4f – Would the Project conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

The Project is not located within any Natural Community Conservation Plan or any other local, regional, or State Conservation Plan. With mitigation, the proposed Project would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.5 - CULTURAL RESOURCES

Would the Project:

- | | | | | | |
|----|---|--------------------------|-------------------------------------|--------------------------|--------------------------|
| a. | Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? | ☐ | ☒ | ☐ | ☐ |
| b. | Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? | ☐ | ☒ | ☐ | ☐ |
| c. | Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☒ | ☐ | ☐ |

Discussion

The discussion below is based on the Cultural Resources Report completed for the Project, attached as Appendix B (QK 2025b).

Impact #3.4.5a – Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

No part of the Project is within the area designated to be historic by the City's General Plan (City of Reedley 2014).

A cultural resources records search (#25-025) was conducted at the Southern San Joaquin Valley Information Center, CSU Bakersfield, to identify previously recorded resources and prior surveys within the Project area and the surrounding half-mile area. No cultural resources have been identified or recorded within one-half mile of the Project.

A Sacred Lands File request was also submitted to the Native American Heritage Commission (NAHC). A response dated January 9, 2025, indicates negative results. The NAHC also provided a list of tribes of interest within the Project vicinity. Letters were sent by the lead agency to the tribes on April 23, 2025, with information on the Project, and they were given a 30-day comment review period. To date, one response has been received declining the consultation request. A copy of that correspondence is included in Appendix B.

Although the components of the Project are within a previously disturbed site, unknown historical resources may be discovered during ground-disturbing activities. In order to account for unanticipated discoveries and the potential to impact previously undocumented or unknown resources, mitigation is recommended. The implementation of MM CUL-1 would establish a procedure for the discovery of cultural resources in the unlikely event they are

unearthed during construction activities. Therefore with implementation of MM CUL-1, impacts under this criterion would be less than significant.

MITIGATION MEASURE(S)

MM CUL-1: If prehistoric or historic-era cultural materials are encountered during construction activities, all work in the immediate vicinity of the find shall halt until a qualified archaeologist can evaluate the find and make recommendations. Cultural resource materials may include prehistoric resources such as flaked and ground stone tools and debris, shell, bone, ceramics, and fire-affected rock, as well as historic resources such as glass, metal, wood, brick, or structural remnants. If a qualified archaeologist determines that the discovery represents a potentially significant cultural resource, additional investigations may be required to mitigate adverse impacts from Project implementation. These additional studies may include avoidance, testing, and evaluation, or data recovery excavation.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.5b – Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

See discussion of Impact #3.4.5a above.

Construction of the Project will include ground-disturbing activities. Although unlikely, there is a chance that trenching and grading activities could unearth previously unknown archaeological resources. Implementation of MM CUL-2 would ensure that archaeological resources discovered during Project activities are adequately addressed through assessment and avoidance measures established by the qualified archaeologist. MM CUL-2 ensures that potential impacts associated with archaeology would be less than significant.

MITIGATION MEASURE(S)

MM CUL-2: In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find, and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the developer and City on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines.

If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and required to be provided to the developer and City. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading

shall occur in the area of the discovery until the lead agency approves the measures to protect these resources.

Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.5c – Would the Project disturb any human remains, including those interred outside of formal cemeteries?

There are no known cemeteries or burials on or near the Project. Although unlikely, subsurface construction activities, such as trenching and grading, associated with the proposed Project could potentially disturb previously undiscovered human burial sites. Accordingly, this is a potentially significant impact. Although considered unlikely, subsurface construction activities could cause a potentially significant impact to previously undiscovered human burial sites. The cultural resources and Sacred Lands File records searches did not indicate the presence of human remains, burials, or cemeteries within or in the vicinity of the Project site. No human remains have been discovered at the Project site, and no burials or cemeteries are known to occur within the area of the site. However, construction would involve earth-disturbing activities, and it is still possible that human remains may be discovered, possibly in association with archaeological sites. Implementation of mitigation measure CUL-3 would ensure that the proposed Project would not directly or indirectly destroy previously unknown human remains. It is unlikely that the proposed Project would disturb any known human remains, including those interred outside of formal cemeteries. With the implementation of the mitigation measures, impacts would be less than significant.

MITIGATION MEASURE(S)

MM CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development Project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98(a).

If the remains are determined to be of Native American descent, the Coroner shall, within 24 hours, notify the NAHC. The NAHC shall then contact the most likely descendant of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity

until the landowner has discussed and conferred with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.6 - ENERGY

Would the Project:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

Impact #3.4.6a – Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Construction

Energy demand during the construction phase would result from the transportation of materials, construction equipment, and construction worker vehicle trips. Construction equipment can include tractors, loaded trucks, forklifts, generators, cranes, rollers, compactors, and an air compressor. The Project would comply with the SJVAPCD requirements regarding the use of fuel-efficient vehicles and equipment to the extent feasible. Compliance with standard regional and local regulations would minimize fuel consumption during Project construction.

There are no unusual Project characteristics that would cause construction equipment to be less energy efficient compared with other similar construction sites in other parts of the State. Thus, construction-related fuel consumption at the Project would not result in inefficient, wasteful, or unnecessary energy use.

Operations

Electricity service for the proposed Project would be provided by Pacific Gas and Electric Company (PG&E). Electricity consumption in Fresno County in 2023 was 7,414 gigawatt-hours (GWh), and natural gas consumption attributable to Fresno County in 2023 was 339.7 million therms (mBTU) (California Energy Commission 2025a, California Energy Commission 2025b).

As part of the Air Quality Impact Assessment (Appendix A), operational estimates for electricity and natural gas use are provided and compared to Fresno County energy use totals in Table 3.4.6-1 below:

**Table 3.4.6-1
Estimated Energy Use**

	Natural Gas (kBtu/yr)	Electricity (kWh/yr)
Single-family Housing	5,953,585	1,430,027
Fresno County Total	339,700,000	7,414,000,000

Source: Appendix A

As shown in Table 3.4.6-1 above, the estimated natural gas use would be approximately 1.75 percent of the total natural gas use of Fresno County. With regard to electricity use, the proposed Project would result in approximately 0.019 percent of the Fresno County total electricity use. The proposed Project will be subject to energy conservation requirements in the California Energy Code (24 CCR Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (24 CCR Part 11). Adherence to Title 24 requirements would ensure that the Project would not result in wasteful or inefficient use of nonrenewable resources due to operation.

Because construction-related energy use would be temporary and limited to the greatest extent feasible through consistency with federal, State, and local policies related to energy conservation, and operation of the Project will comply with all energy efficiency standards required under Title 24, Section 6, and these standards were specifically developed to be energy efficient for residential projects. The Project's construction and operation would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources and would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.6b – Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Energy-saving strategies would be implemented where feasible to reduce the Project's energy consumption during the construction and post-construction phases. Strategies that would be implemented include those recommended by CARB such as diesel anti-idling measures, light-duty vehicle technology, and usage of alternative fuels such as biodiesel blends and ethanol. Additionally, as outlined in the SJVAPCD's GAMAQI, recommendations

to reduce energy consumption include shutting down equipment when not in use for extended periods, limiting the usage of construction equipment to eight cumulative hours per day, and usage of electric equipment for construction whenever possible in lieu of diesel or gasoline-powered equipment. Best Management Practices (BMP) would be implemented as part of the Project.

Based on this analysis, the Project would be consistent and not conflict with or obstruct a State or local plan related to renewable energy or energy consumption. Impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.7 - GEOLOGY AND SOILS

Would the Project:

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii. Strong seismic ground shaking?
 - iii. Seismic-related ground failure, including liquefaction?
 - iv. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas 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?

☐	☐	☒	☐
☐	☐	☒	☐
☐	☐	☒	☐
☐	☐	☒	☐
☐	☒	☐	☐
☐	☐	☒	☐
☐	☐	☐	☒
☐	☒	☐	☐

Discussion

Impact #3.4.7a(i) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?

Known major faults are over 50 miles away and include the San Andreas Fault, Coalinga area blind thrust fault(s), the Long Valley, Owens Valley, and White Wolf/Tehachapi fault systems (California Department of Conservation 2024a).

The proposed Project is expected to comply with the California Building Code (CBC) requirements that would ensure acceptable and safe building practices are implemented to reduce potential adverse effects from fault-related ground shaking. Therefore, with consideration of the distance of the Project from earthquake faults and mandatory compliance with CBC requirements, the Project would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(ii) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – strong seismic ground shaking?

See discussion of Impact #3.4.7a(i) above.

There are no known active earthquake faults or Alquist-Priolo fault zones that traverse the City. However, seismic events caused by active and potentially active faults in the region could result in seismic ground shaking on-site. Construction will comply with all applicable local and State regulations including applicable CBC requirements for safe and acceptable building practices to reduce potential adverse effects from strong seismic ground shaking and General Plan Policy SE 5.2.1 requiring geotechnical and seismic reports when a project is located on land exhibiting potentially unstable soil conditions, suitability for additional development, or other hazardous geologic conditions. Compliance with these regulatory requirements reduces any potentially significant impacts to structures resulting from strong seismic ground shaking at the Project site. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(iii) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – seismic-related ground failure, including liquefaction?

See discussion of Impact #3.4.7a(i) and (ii) above.

The Reedley planning area is characterized as having a relatively thin section of sedimentary rock overlying granite. The amplification of shaking that would affect low-to-medium rise structures is relatively high. Secondary hazards due to landslides, subsidence and settlement, liquefaction, and seiching are considered minimal in this area (City of Reedley 2014).

Liquefaction is defined as a phenomenon where earthquake-induced ground vibrations sudden loss of soil strength resulting from shaking during an earthquake. Land with the water table less than 50 feet below grade (bgs) is especially vulnerable. When this occurs, the soil can completely lose its shear strength and enter a liquefied state. The possibility of liquefaction is dependent upon grain size, relative density, confining pressure, saturation of the soils, and intensity and duration of ground shaking. In order for liquefaction to occur, three criteria must be met: “low density,” coarse-grained (sandy) soils, a groundwater depth of less than about 50 feet, and a potential for seismic shaking from nearby large magnitude earthquakes. The area around the City has a measured depth of approximately 79 feet bgs (California Department of Water Resources 2025). Because the depth of the groundwater at the Project site is greater than 50 feet, there is a negligible risk of liquefaction occurring at the Project site during a seismic event.

Based on this analysis, the Project would have a less-than-significant impact exposing people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Adherence to all applicable regulations would reduce or avoid any potential impacts to structures resulting from liquefaction at the Project site, and impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7a(iv) – Would the Project Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – landslides?

The Project site and vicinity is relatively flat with no significant topological features. As such, there is no potential for rock falls or landslides to impact the Project in the event of a major earthquake, as the area has no dramatic elevation changes. The Project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7b – Would the Project result in substantial soil erosion or the loss of topsoil?

The Project site and surrounding area is mostly flat. Construction activities for the Project may disturb minimal amounts of soils during construction and would expose these disturbed areas to erosion by wind and water. However, since the Project is anticipated to disturb more than one acre of land at, the Project is subject to National Pollutant Discharge Elimination System (NPDES) Program requirements. As such, it will have to develop a Stormwater Pollution Prevention Plan (SWPPP). A SWPPP must identify potential sources of erosion or sedimentation as well as identify and implement various types of BMPs to prevent erosion and sedimentation from occurring during construction. Typical BMPs intended to control erosion include sandbags, retention basins, silt fencing, street sweeping, etc.

Mitigation Measure GEO-1 requires the approval of a SWPPP to comply with the NPDES General Construction Permit. The Project will comply with all grading requirements as outlined in Title 24 and Appendix J of the CBC. The Project is not expected to result in substantial erosion or the loss of topsoil with the incorporation of MM GEO-1.

Once constructed, the Project will have both impermeable surfaces as well as permeable surfaces. Impermeable surface would include roadways, driveways, and building sites. Permeable surfaces would include any landscaped areas. Stormwater will be directed to the planned 1.75-acre on-site stormwater basin, developed under City of Reedley adopted standards. Therefore, the development of the Project would not result in substantial surface soils exposure to wind or water, and with implementation of MM GEO-1, would result in a less-than-significant impact.

MITIGATION MEASURE(S)

MM GEO-1: Prior to issuance of grading or building permits, the Project applicant shall submit to the City: (1) the approved SWPPP and (2) the Notice of Intent (NOI) to comply with the General NPDES from the Central Valley Regional Water Quality Control Board. The

requirements of the SWPPP and NPDES shall be incorporated into design specifications and construction contracts. Recommended Best Management Practices for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly.
- Protecting existing storm drain inlets and stabilizing disturbed areas.
- Implementing erosion controls.
- Properly managing construction materials.
- Managing waste, aggressively controlling litter, and implementing sediment control.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.7c – Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

See discussion in Impact #3.4.7a(iii) and 3.4.7a(iv) above.

There are no slopes on or near the site, and the Project would not expose the people or structures to significant risks from landslides.

The proposed Project will comply with all City and State regulations pertaining to construction, including CBC and the City's Municipal Code. Compliance with the existing regulatory framework would be adequate to reduce any potential impacts to less-than-significant levels. Moreover, the Project will be designed by an engineer to resist potential side effects of spreading, subsidence, liquefaction, or collapse. Therefore, the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7d – Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Clay soils are typically more susceptible to expansion and subsequent hazards due to the disparity between their wet and dry compositions. Per the National Resources Conservation Service (NRCS), Web Soil Survey, the Project site consists of Greenfield sandy loam, moderately deep, 0 to 3 percent slopes, and Ramona loam (Natural Resources Conservation Service 2024). Sandy loam soils are typically comprised of sand and silt compositions with a low percentage of clay. With consideration of the soil type identified on the site, the Project

would not be located on expansive soil. Additionally, the Project will comply with applicable CBC regulations for development within specific soil types and would result in less-than-significant impacts.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.7e – Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

The proposed Project does not include private septic systems. The Project will connect to the existing City sewer system for the disposal of generated wastewater during operations. The Project will comply with applicable City of Reedley development standards for connection to existing City sewer infrastructure. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.7f – Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The Project site has previously been disturbed by past agricultural activities. However, ground-disturbing activities during construction could potentially impact previously undiscovered paleontological resources or unique geologic features. The implementation of MM GEO-2 would reduce potential impacts to a less-than-significant level. As such, with the incorporation of MM GEO-2, impacts would be less than significant.

MITIGATION MEASURE(S)

MM GEO-2: In the event paleontological resources are encountered during ground-disturbance activities, all work within 25 feet of the find shall halt until a qualified paleontologist, as defined by the Society of Vertebrate Paleontology Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (2010), can evaluate the find and make recommendations regarding treatment. Paleontological resource materials may include resources such as fossils, plant impressions, or animal tracks preserved in rock. The qualified paleontologist shall contact the Natural History Museum of

Los Angeles County or another appropriate facility regarding any discoveries of paleontological resources.

If the qualified paleontologist determines that the discovery represents a potentially significant paleontological resource, additional investigations and fossil recovery may be required to mitigate adverse impacts from Project implementation. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. If the resources are not significant, avoidance is not necessary. If the resources are significant, they shall be avoided to ensure no adverse effects, or such effects must be mitigated. Construction in that area shall not resume until the resource-appropriate measures are recommended or the materials are determined to be less than significant. If the resource is significant and fossil recovery is the identified form of treatment, then the fossil shall be deposited in an accredited and permanent scientific institution. Copies of all correspondence and reports shall be submitted to the Lead Agency.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.8 - GREENHOUSE GAS EMISSIONS

Would the Project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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 adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |

Discussion

The analyses in this section are based on an *Air Quality Impact Analysis* (QK 2025a) attached as Appendix A.

Impact #3.4.8a – Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Although construction of the proposed Project would result in temporary emissions of greenhouse gases (GHG), the Project as a whole is not expected to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The estimated GHG emissions from construction and operational activities associated with the proposed Project are shown in Table 3.4.8-1 below.

Table 3.4.8-1
Estimated Annual GHG Emissions (MT/Year)

Source	CO ₂	CH ₄	N ₂ O	CO ₂ e
Total Construction Emissions	874.74	0.03	0.02	880.74
<i>Annualized Construction Emissions¹</i>	29.16	0.00	0.00	29.36
Total Operational Emissions	1,503	1.54	0.06	1,562

Source: Appendix A

In the decade after SJVAPCD adopted their Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA, several new laws and executive orders were adopted that require additional reductions in years after 2020. For instance, Senate Bill (SB) 32 requires that GHG emissions be 40 percent less than 1990 levels by 2030. More drastic still, Senate Bill 100, which was signed by the Governor recently, requires 100 percent zero-carbon electricity by 2045. On the day SB 100 was signed into law,

the Governor also signed Executive Order B-55-18, which commits California to total, economy-wide carbon neutrality by 2045. Clearly, the 2009 Guidance may be somewhat inadequate in producing a meaningful comparison by today's standards, which propose a grand vision that, if achieved, would fundamentally change how business is conducted and citizens live in the State. Thus, as discussed in the most recent updates to the Scoping Plan, the objectives of the Scoping Plan affect entire sectors of the economy, and it no longer makes sense to evaluate GHG emissions on a project level.

For these reasons, the Project GHG emissions levels presented in Table 3.4.8-1 are primarily for disclosure purposes. The Project's largest contributors to GHG emissions are from electricity and exhaust from transportation fuels. Electricity and transportation fuels are, in effect, regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Trade Program and other programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each such sector-wide program exists within the framework of Assembly Bill (AB) 32 and its descendant laws, the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

The Project would generate GHGs from electricity use and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply chain. As such, each citizen of California (including those creating emissions of this Project) will have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan). The Project would meet its fair share of the cost to mitigate the cumulative impact of global climate change because energy purchases are from the California market. Thus, consumers of electricity and transportation fuels are, in effect, regulated by higher-level emissions restrictions on the producers of these energy sources. Therefore, the Project would have a less-than-significant impact on applicable GHG reduction plans, and the Project's contribution to cumulative global climate change impacts would not be cumulatively considerable.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.8b – Would the Project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

In 2006, the California State legislature adopted AB 32—The California Global Warming Solutions Act. AB 32 directs the state to reduce California GHG emissions to 1990 levels by 2020. It instructs CARB to establish a program of regulatory and market mechanisms to achieve GHG reductions and to implement a mandatory GHG reporting and verification program. In accordance with AB 32, the Climate Change Scoping Plan (Scoping Plan) outlines

California's strategy for achieving the 2020 GHG emissions limit outlined under the law. The 2022 Scoping Plan was updated with new strategies to achieve carbon neutrality by 2045 (California Air Resources Board 2022). The Project would generate GHGs from electricity use and combustion of gasoline/diesel fuels, each of which is regulated near the top of the supply chain. As such, each citizen of California (including the operator of the Project) will have no choice but to purchase electricity and fuels produced in a way that is acceptable to the California market. Thus, Project GHG emissions will be consistent with the relevant plan (i.e., AB 32 Scoping Plan).

Project GHG emissions levels presented in Table 3.4.8-1 above are primarily for disclosure purposes because impact analysis for the Project follows the approach certified by South Coast Air Quality Management District (AQMD) in the Final Negative Declaration for the Phillips 66 Los Angeles Refinery Carson Plant – Crude Oil Storage Capacity Project on December 12, 2014. The approach used by South Coast AQMD to assess GHG impacts from that Project recognizes that consumers of electricity and transportation fuels are, in effect, regulated by requiring providers and importers of electricity and fuel to participate in the GHG Cap-and-Trade Program and other Programs (e.g., low carbon fuel standard, renewable portfolio standard, etc.). Each such sector-wide program exists within the framework of AB 32 and its descendant laws, the purpose of which is to achieve GHG emissions reductions consistent with the AB 32 Scoping Plan.

As noted in Impact #3.4.8a above, the Project would not generate cumulatively considerable GHG impacts, nor would it conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The Project will not result in the emissions of hydrofluorocarbons (HFC), perfluorocarbons (PFC), or sulfur hexafluoride (SF₆), the other gases identified as GHG in AB32. The proposed Project will be subject to any regulations developed under AB32 as determined by CARB. Furthermore, the Project will be required to implement energy conservation regulations (CalGreen codes:Title 24) and Green Building Code standards. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
3.4.9 - HAZARDS AND HAZARDOUS MATERIALS				
Would the Project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site that 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 in the Project area?	☐	☐	☐	☒
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Discussion

Impact #3.4.9a – Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

A review of the EnviroStor database and the Geotracker database did not identify any active hazardous material site or hazardous material cleanup site in proximity to the Project site (California Department of Toxic Substances Control 2024, State Water Resources Control Board 2024).

Construction

Construction of the Project would involve the temporary transport and use of minor quantities of hazardous materials such as fuels, oils, lubricants, hydraulic fluids, paints, and solvents. Per the California Health and Safety Code and CCR, a Hazardous Materials Business Plan (HMBP) would be submitted to the California Environmental Reporting System (CERS) if construction crews handled a listed hazardous material above a certain threshold. Specific hazardous chemicals reported to the CERS and the Certified Unified Program Agency (CUPA), and procedures specified in the Spill Prevention Compliance Plan (SPCC) would provide a system of addressing hazardous materials handled by the Project. The material threshold for this program is 55 gallons of liquid, 500 pounds of solid, 200 cubic feet of compressed gas, and/or applicable State/federal threshold quantity for extremely hazardous material.

A HMBP consists of the following items: business activities, business owner/operator identification, hazardous materials inventory stored and/or generated, facility site map, emergency response/contingency plan for procedures in the event of a release or threatened release of a hazardous material/waste, employee training plan, which includes hazardous communications/safety data sheets (SDS), annual training refresher courses, and safety procedures in the event of a release or threatened release of a hazardous material/waste, etc.

However, the types and quantities of hazardous materials anticipated to be used and stored on-site during construction would not be of a significant amount to create a reasonably foreseeable upset or accident condition. The handling and transport of all hazardous materials on-site would be performed in accordance with all applicable federal, State, and local laws and regulations. Designated truck routes surrounding the City include SR-99, SR-201, and SR-63 (Federal Motor Carrier Safety Administration 2024). The Reedley Fire Department (RFD) would respond to any hazardous materials incident, and additional fire department units would respond as necessary. As a result of a mutual aid agreement between the RFD and Fresno County Fire Protection District (FCFPD), FCFPD may be requested to provide emergency backup service to the City.

Minor amounts of hazardous and non-hazardous materials and wastes would likely be transported to and from the Project site during the construction phase of the proposed Project. Any hazardous waste or debris that is generated during the construction of the

proposed Project would be collected and transported away from the site and disposed of at an approved off-site landfill or other such facilities. In addition, sanitary waste generated during construction would be managed through portable toilets, which would be located at reasonably accessible on-site locations. Hazardous materials such as paint, bleach, water treatment chemicals, gasoline, oil, etc., may be used during construction. These materials are stored in appropriate storage locations and containers in the manner specified by the manufacturer and disposed of in accordance with local, federal, and State regulations. Residential and commercial construction generally utilizes fewer hazardous chemicals or chemicals in relatively small quantities and concentrations compared to industrial uses. No significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous waste during the construction or operation of the new residential development would occur.

Operations

Once constructed, the use of such materials as paint, bleach, and lawn fertilizer is considered common for residential developments. It would be unlikely for such materials to be stored or used in such quantities that would be considered a significant hazard. Typical household hazardous waste generated during operation would be disposed of through the County of Fresno Residential Hazardous Waste free drop-off locations or through Mid Valley Disposal collection services (Fresno County 2024, Mid Valley Disposal 2024). The use of hazardous materials will be limited in quantities and duration, and if spilled, would be localized.

Based on the analysis above, Project construction and operation are not anticipated to result in significant impacts due to the transportation, use, or disposal of hazardous materials. Therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9b – Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

See Impact #3.4.9a, above.

Per the California Department of Toxic Substances Control (DTSC) Envirostor database, the Project site is not located on or within proximity to a listed hazardous materials/waste facility (California Department of Toxic Substances Control 2024). Additionally, there are no records of a leaking underground storage tank on the Project site (State Water Resources Control Board 2024). Further, there are no active Geologic Energy Management Division (CalGEM) identified oil or gas fields within the Project site (CalGEM 2024).

As noted in Impact #3.4.7b and imposed as MM GEO-1, the Project would be required to prepare and implement a SWPPP under the NPDES permit for construction sites over one acre. The SWPPP identifies potential sources of pollution from the Project that may affect the quality of stormwater discharge and requires that BMPs be implemented to prevent contamination at the source. By implementing BMPs during construction activities, accidental spills of hazardous materials would be contained, and soil and groundwater contamination would be minimized or prevented.

Consequently, the Project is not anticipated to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions. As discussed above, there is no evidence of a significant environmental condition on the Project site that could potentially result in a significant impact. Therefore, as discussed above, should a previously unidentified condition be identified, that could result in an upset or accidental hazardous material spill, regulatory procedures, including proper abandonment/removal of the condition, would be followed, and the Project impacts would be less than significant.

MITIGATION MEASURE(S)

Implementation of MM GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.9c – Would the Project emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

See Impacts #3.4.3c, 3.4.9a and b, above.

The Project site is located adjacent to Silas Bartsch School. Silas Bartsch School is a transitional kindergarten to 8th-grade school within the Kings Canyon Unified School District. Construction activities of the proposed Project will result in the temporary use of small amounts of hazardous materials and or substances, such as lubricant and diesel fuel, during construction. As described in Impact #3.4.3c and Table 3.4.3-9, an assessment of health risk was conducted as part of the AQIA (Appendix A), to determine health risk associated with HAP emissions resulting from construction equipment use on nearby sensitive receptors. The health risk associated with HAP emissions was determined to be below significance thresholds established by SJVAPCD. Therefore, the Project construction would not emit hazardous emissions that would adversely affect the nearby school. Once constructed, the operation of the Project components would not utilize hazardous materials in excess of typical household use. Therefore, the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9d – Would the Project be located on a site that 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?

See Impact 3.4.9b, above.

An online search was conducted to identify hazardous waste locations on or near the Project site. The search indicated that there are no reported hazardous or toxic sites within or in close proximity to the Project site (California Department of Toxic Substances Control 2024).

There is no data identifying any facilities in the vicinity that might reasonably be anticipated to emit hazardous air emissions or handle hazardous materials, substances, or wastes that might affect the proposed residential development. Therefore, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9e – For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?

The Project site is located approximately 4.5 miles south of Reedley Municipal Airport. The Project site is located outside of the airport influence area, as identified in the Fresno County Airport Land Use Compatibility Plan (ALUCP) (Fresno County Airport Land Use Commission 2023). Therefore, the Project is not within two miles of an airport and would not result in a safety hazard or excessive noise for people working in the Project area. As such, there would be no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.9f – Would the Project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

The 2024 Fresno County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) identifies hazards present within the County, provides a risk assessment for the respective hazard, and adopts mitigation strategies to reduce risk. In addition to the Fresno County MJHMP, the Project will be required to comply with City safety requirements adopted in the Fire Code and other code requirements for emergency response. These requirements will include meeting minimum emergency access requirements and fire suppression requirements.

The proposed Project would not inhibit the ability of local roadways to accommodate emergency response and evacuation activities. Further, the Project includes the construction of East North Avenue, which would increase emergency access to the site. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.9g – Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

According to available data from Cal Fire, the Project site is within a Local Responsibility Area (LRA) Unzoned Fire Hazard Severity Zone (CalFire 2025). The General Plan includes goals and policies that would protect the Project and the community from fire dangers that would be followed during the construction and operation of the Project. These policies include maintaining reasonable levels of accessibility and infrastructure support for fire suppression and enforcing the latest Fire Code.

Construction activities and the Project operation are not expected to increase the risk of wildfires on and adjacent to the Project site. The Project will comply with all applicable State and local standards as required by local fire codes. Therefore, the Project would have less-than-significant impacts.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.10 - HYDROLOGY AND WATER QUALITY

Would the Project:

a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface 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 of amount of surface runoff in a manner which would result 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?	☐	☒	☐	☐

The analysis in this section is substantiated in part by the Water Supply Assessment (WSA)(QK 2025c) prepared for the Project and attached as Appendix C.

Discussion

Impact #3.4.10a – Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality?

See also Impact #3.4.7b. The proposed Project construction and groundbreaking activities have the potential to cause erosion, sedimentation, and discharge of construction debris from the Project site. Clearing of vegetation and grading activities, for example, could lead to exposed or stockpiled soils susceptible to peak stormwater runoff flows. Also, the compaction of soils by heavy equipment may minimally reduce the infiltration capacity of soils (exposed during construction) and increase runoff and erosion potential. The presence of significant amounts of raw materials for construction, including concrete and asphalt, may lead to stormwater runoff contamination. If uncontrolled, these materials could lead to water quality problems, including sediment-laden runoff, prohibited non-stormwater discharges, and ultimately the degradation of downstream receiving water bodies. As discussed previously, the Project would disturb more than one acre and would be required to prepare a SWPPP and ensure implementation of BMPs that address potential issues related to soil erosion and contaminated runoff. Implementing BMPs for construction activities, such as the use of straw waddle sandbags, silt fencing, swales, street sweeping, etc., will be implemented and would reduce stormwater runoff to a less-than-significant impact during construction activities.

With regard to the operation of the Project, the Project includes the development of a storm drain basin and associated stormwater infrastructure. These improvements are expected to be developed to City design standards and meet City-adopted water quality standards.

The Project's surface or groundwater quality impacts are expected to be less than significant with the incorporation of GEO-1, as the preparation and approval of a SWPPP would ensure BMPs for construction activities would be implemented. For operation, stormwater would be held on-site via the proposed stormwater drainage basin that meets City design standards. The potential for water quality impacts is reduced to a less-than-significant impact on water quality.

MITIGATION MEASURE(S)

Implementation of GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be less than significant with mitigation incorporated.

Impact #3.4.10b – Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

The City lies directly over the Kings Basin from which the City extracts its domestic water supply (City of Reedley 2014) and depends entirely on groundwater pumping from the Kings

Basin and has never had a single year or multiple dry years in which it did not meet 100 percent of its demand, regardless of regional hydrology (City of Reedley 2022).

Under the State Urban Water Management Planning Act, an urban water supplier providing water for municipal purposes to more than 3,000 customers or serving more than 3,000 acre-feet annually is required to adopt the 2020 City of Reedley UWMP Urban Water Management Plan (UWMP) demonstrating water supply reliability in normal, single dry, and multiple dry water years. The City supplies potable water to a population of approximately 26,000 residents through approximately 5,914 active service connections (City of Reedley 2022).

Table 3.4.10-1 through Table 3.4.10-3 show the normal year supply and demand comparison, the single dry year supply and demand comparison, and the multiple dry year supply and demand comparison.

Table 3.4.10-1
Normal Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
Difference	0	0	0	0	0

Source: Appendix C

Table 3.4.10-2
Single Dry Year Supply and Demand Comparison

	2025	2030	2035	2040	2045
Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
Demand Totals (mg)	1,795	2,052	2,306	2,562	2,817
Difference	0	0	0	0	0

Source: Appendix C

Table 3.4.10-3
Multiple Dry Year Supply and Demand Comparison

		2025	2030	2035	2040	2045
First Year	Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Difference	0	0	0	0	0

		2025	2030	2035	2040	2045
Second Year	Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Difference	0	0	0	0	0
Third Year	Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Difference	0	0	0	0	0
Fourth Year	Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Difference	0	0	0	0	0
Fifth Year	Supply Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Demand Totals (MG)	1,795	2,052	2,306	2,562	2,817
	Difference	0	0	0	0	0

Source: Appendix C

As shown in the tables above, anticipated groundwater supplies are sufficient to meet all demands through the year 2045 even under multiple-dry year drought conditions.

The prepared WSA estimates that the long-term average daily operational water demand will be for the residential users and is anticipated to be approximately 35.08 million gallons per year or 107.64 acre-feet per year for the total build-out of the Project. This is based on each residential unit having an average daily water demand of 546 gallons per day (based on the 156-gallon per capita/day average in the UWMP and 3.5 people per unit) across the entire buildout of the Project. The Project's long-term operational water demand is 1.25 percent (35.08 million gallons [MG]/2,817 MG) of the available water supply in the City (QK 2025c). The Project will implement water conservation methods by installing more efficient appliances such as low-flow toilets, and faucets, and use drip irrigation and drought-tolerant plants or artificial turf for landscaping, as is feasible.

The Project proposes the development of 176 single-family residential lots to be developed. The UWMP projects a service area population of 47,369 by the year 2045, approximately 21,000 more residents than the current service area population. Therefore, the Project's anticipated water use would be accounted for within the supply and demand totals as shown in the UWMP. As previously noted, the UWMP has concluded that the groundwater supplies are sufficient to meet Project water demand for the City for all climate conditions through 2045, and therefore, Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10c(i) –Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

The disturbance of soils on-site during construction that could cause erosion is minimal, but may result in temporary construction impacts. Impacts from construction and operation are discussed below.

As discussed in Impact #3.4.10a, above, potential impacts on water quality arising from erosion and sedimentation are expected to be localized and temporary during construction. Construction-related erosion and sedimentation impacts as a result of soil disturbance would be less than significant after implementation of a SWPPP and BMPs required by the NPDES.

The existing drainage pattern of the site and area would be affected by the Project's development because of the increase in impervious surfaces at the site. The construction of the Project includes the development of an on-site stormwater drainage basin, which would be developed under City standards.

The Project will comply with local regulations in order to minimize impacts during construction and post-construction of the Project. The Project will not alter a stream or river. With implementation of GEO-1, BMPs for erosion or siltation on- or off-site would be implemented and result in a less than significant.

MITIGATION MEASURE(S)

Implementation of GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.10c(ii) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate of amount of surface runoff in a manner which would result flooding on- or off-site?

See also Impact #3.4.10c(i) above.

Existing drainage patterns of the site would be affected by the Project development because the increase in impervious surfaces at the site can increase the potential for stormwater runoff and soil erosion. The Project site does not contain any water features, streams, or rivers. Buttonwillow Ditch is located along the eastern property boundary of the Project site, which will be undergrounded per City requirements. The Project includes a two-acre Outlot E as a storm drain basin to maintain stormwater on site. The basin would allow stormwater to percolate back into the underlying aquifer. All Project components will comply with the City Municipal Code for urban stormwater quality management. Additionally, as noted above, an on-site stormwater drainage basin is proposed as part of the Project.

The Project would not cause substantial surface runoff that would result in flooding on- or off-site. Therefore, with mitigation, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

Implementation of MM GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.10c(iii) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would 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?

Please see Impacts #3.4.10a through c(ii) above.

As previously discussed, construction of the Project is required to comply with BMPs implemented under the approved SWPPP (MM GEO-1) and keep stormwater on-site to reduce the potential for pollutants runoff. The addition of impervious surfaces as a result of the Project would be addressed through the development of stormwater drainage infrastructure and an on-site stormwater drainage basin. These improvements are anticipated to be developed in compliance with City adopted design standards for stormwater management. Additionally, the residential lots would include pervious surface through landscaping to allow for stormwater percolation.

The Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site, contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, nor provide additional sources of polluted runoff. Therefore, with the implementation of MM GEO-1, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

Implementation of MM GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.10c(iv) – Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

See Impact #3.4.4c and Impacts #3.4.10a through c(ii) above

There are no waters of the U.S. or other water features within the boundaries of the Project site itself. As noted in Impact #3.4.4c, the Buttonwillow Ditch is located along the westerly property boundary of the Project site. As a part of the Project, this blueline drainage will be undergrounded to meet City requirements. The Project site is within a FEMA area of minimal flood hazard (FEMA 2024), and as such, the Project will not impede or redirect flood flows.

The Project is flat with little to no topographic variation and would not significantly alter existing drainage patterns or the course of a stream or river. Therefore, the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10d – Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

As noted above, the Project site is not located within a flood hazard zone (FEMA 2024). The Project site is not located near the ocean or a steep topographic feature (i.e., mountain, hill, bluff, etc.). Tsunamis are waves generated in oceans from seismic activity. Due to the inland location of the site, tsunamis are not considered a hazard for the site. Therefore, there is no potential for the site to be inundated by a tsunami or mudflow.

A seiche is a wave generated by the periodic oscillation of a body of water whose period is a function of the resonant characteristics of the containing basin as controlled by its physical dimensions. There is no body of water within the vicinity of the Project site. There is no potential for the inundation of the Project site by seiche.

The Fresno County 2024 Comprehensive General Plan Review and Revision, provides an updated evaluation of inundation hazards due to dam failure. The City, including the Project site is located outside dam inundation hazards. Therefore, the Project would not be subject to release of pollutants due to inundation as a result of a dam failure.

As the Project is not located in a flood hazard zone or dam inundation hazard zone, and would not be subject to tsunami or seiche zone hazards. Project impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.10e – Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

See Impacts #3.4.10a-b, above.

As discussed previously, the water demand from the construction and operation of this Project would not significantly deplete groundwater resources or interference with groundwater recharge. The Project would not expand water demand beyond a reasonable amount supplied to similar-sized educational facilities, and in fact, will implement water conservation methods by installing more efficient appliances such as low-flow toilets, and faucets, and use drip irrigation and drought-tolerant plants or artificial turf for landscaping, as is feasible.

As the Project site use has been determined to be consistent with the UWMP, the proposed Project will not substantially deplete aquifer supplies or interfere substantially with groundwater recharge or significantly alter local groundwater supplies, nor deplete the water supply or significantly increase water demand that would conflict with the UWMP. Therefore, no additional requirements or implementation measures are applicable

The Project will also comply with all applicable local and State standards during construction and operation including preparation and approval of a SWPPP as per GEO-1. The Project is not anticipated to use or substantially deplete groundwater supplies or conflict with any adopted groundwater management plan, as noted above. Therefore, Project impacts would be less than significant with mitigation incorporated.

MITIGATION MEASURE(S)

Implementation of GEO-1.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.11 - LAND USE AND PLANNING

Would the Project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. | Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. | Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |

Discussion

Impact #3.4.11a – Would the Project physically divide an established community?

The Project is undeveloped land proposed along the eastern edge of the City corporate limits. The area is progressively developing with residential tracts as a natural progression of the City's buildout of the General Plan. The proposed Project site would not create a division between any established communities. The Project would connect to existing public rights-of-way and would not physically divide an established community. Therefore, the Project will have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.11b – Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The Project proposes to amend the land use designation of a 3.5-acre portion of the overall Project site to be consistent with the remaining 30.5 acres of the Project site. With approval of the proposed General Plan Amendment application, the Project does not create a conflict with any land use plan, policy, or regulation. As the proposed General Plan Amendment is requesting to amend the land use designation of a 3.5-acre portion from High Density

Residential to Low Density Residential, consistency of the Project will applicable policies for Low Density Residential must be considered. The Project will be consistent with the following General Plan policies for Low Density Residential:

- **LU 2.7.1(b):** Low Density Residential (4-8 dwelling units per gross acre) – The Low Density Residential designation is intended for single-family detached residential development, attached single family, and low density multi-family uses. The Low Density Residential designation is the predominant residential designation in the City of Reedley. This land use category accommodates the typical residential subdivision in Reedley.
- **LU 2.7.2:** Residential development projects shall achieve the minimum density requirements as designated by the General Plan Land Use Map.
- **LU 2.7.6:** Ensure that residential development occurs in areas that have sufficient infrastructure to accommodate the density of residential development being proposed.

The density of the Project will be 5.19 dwelling units per acre and meets the minimum density requirements of the Low Density Residential land use designation established in Policy LU 2.7.1(b) and as required under Policy LU 2.7.2. With regard to Policy LU 2.7.6, the Project is anticipated to be serviced by City water, wastewater, and stormwater drainage facilities. City services are available and will have the capacity to service the Project. To supplement service impacts, the City requires payment of developer impact fees to ensure that adequate funds are collected to operate, maintain existing facilities, and construct new facilities. The Project will pay the appropriate development impact fees in compliance with General Plan policy and will have sufficient infrastructure to accommodate the proposed residential development.

The proposed Project would assist the City in meeting its Regional Housing Needs Allocation (RHNA) of 1,463 for the 2023-2031 planning period (Fresno Council of Governments 2022). This total is further classified by 403 very low-income housing units, 183 low-income housing units, 211 moderate-income units, and 666 above moderate-income housing units. The Project will result in providing 166 single-family residential units at the moderate or above moderate-income level. RHNA is based on countywide housing Projections developed by the California Department of Housing and Community Development (HCD). HCD works with the regional Council of Governments to determine the amount of housing needed within the region. As such, the proposed Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.12 - MINERAL RESOURCES

Would the Project:

- | | | | | | |
|----|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. | Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | ☐ | ☐ | ☐ | ☒ |
| b. | Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | ☐ | ☐ | ☐ | ☒ |

Discussion

Impact #3.4.12a – Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The California Department of Conservation, Geological Survey, classifies lands into Aggregate and Mineral Resource Zones (MRZ) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. Lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans. The Fresno County General Plan Background Report indicates that the City of Reedley is not located within an MRZ (Fresno County 2000).

The Project site is not located in an identified CalGEM gas or oilfield, and there are no known wells located on the site. The proposed Project would not result in the loss of availability of mineral resources, as the Project does not propose the extraction of mineral resources.

The proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Therefore, the Project will have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Impact #3.4.12b – Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The proposed Project is not designated as a mineral recovery area and the Project would not alter any existing plans that protect mineral resources. As a result, the proposed Project would not interfere with known mining operations and would not result in the loss of land designated for mineral and petroleum.

The proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, the Project will have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.13 - NOISE

Would the Project result in:

- | | | | | | |
|----|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. | Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b. | Generation of excessive ground-borne vibration or ground-borne 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? | ☐ | ☐ | ☐ | ☒ |

Discussion

The analyses in this section are based on an Acoustical Analysis (WJV Acoustics 2024) attached as Appendix D.

Impact #3.4.13a – Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?

The City General Plan Noise Element sets noise compatibility standards for both transportation and non-transportation (stationary) noise sources. The General Plan sets noise compatibility standards for transportation noise sources in terms of the Day-Night Average Level (Ldn). The Ldn represents the time-weighted energy average noise level for a 24-hour day, with a 10 dB penalty added to noise levels occurring during the nighttime hours (10:00p.m.-7:00 a.m.). The Ldn represents cumulative exposure to noise over an extended period of time and are therefore calculated based upon annual average conditions. The General Plan Noise Element provides an exterior noise standard of 60 dB Ldn and an interior noise standard of 45 dB Ldn, for noise-sensitive land uses exposed to transportation noise sources, as shown in Table 3.4.13-1.

Table 3.4.13-1
Non-Transportation (Stationary) Noise Level Standards

Location of Measurement	Allowable Transportation Source Noise Exposure	
	Noise Sensitive Land Uses	New Transportation Noise Sources
Indoor	45 dBA Ldn	45 dBA Ldn
Outdoor	60 dBA Ldn	60 dBA Ldn

1. This table is applicable to noise sources created by either new development and/or new transportation Projects.
2. Based on an evaluation of the existing condition and proposed Project, the Community Development Director may allow exterior exposure up to 65 dB Ldn where practical application of construction practices has been used to mitigate exterior noise exposure.
3. dBA = A-weighted decibels Ldn = day-night average noise level

Source: Appendix D

The standards for non-transportation (stationary) noise sources are provided in Table 3.4.13-2, below.

Table 3.4.13-2
Non-Transportation (Stationary) Noise Level Standards

Daytime (7:00 a.m. – 10:00 p.m.)		Nighttime (10:00 p.m. – 7:00 a.m.)	
Leq	Lmax	Leq	Lmax
55	70	50	65

1. As determined within outdoor activity areas of existing or planned noise-sensitive uses, if outdoor activity area locations are unknown, the allowable noise exposure shall be determined at the property line of the noise sensitive use.
2. Based on an evaluation of the existing conditions and proposed Project, the Community Development Director may allow exterior exposure up to 65 dB DNL where practical application of construction practices has been used to mitigate exterior noise exposure.
3. Information sourced from City of Reedley General Plan Noise Element

Source: Appendix D

Construction Noise Impacts

Project construction would result in short-term noise impacts on nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days, depending on the phase (e.g., demolition, land clearing, grading, excavation, erection) of construction. Noise produced by construction equipment such as earthmovers, material handlers, and portable generators can reach high levels. Generally, the grading phase of construction involves the most equipment and generates the highest noise levels, although noise ranges are usually similar across all construction phases. Typical noise levels generated by individual pieces of construction equipment generally range from approximately 77 dBA to 90 dBA maximum sound level (Lmax) at 50 feet. Depending on the equipment required and duration of use, average-hourly noise levels associated with construction activity typically range from roughly 65 to 90 dBA equivalent continuous sound level (Leq) at 50 feet. Table 3.4.13-3 depicts the noise levels generated by typical

construction equipment; however, not all these pieces of equipment will be used in the construction of the Project.

Table 3.4.13-3
Typical Construction Equipment Maximum Noise Levels, dBA

Type of Equipment	100 feet	200 feet	300 feet
Concrete	84	78	74
Crane	75	69	65
Excavator	75	69	65
Front End Loader	73	67	63
Jackhammer	83	77	73
Paver	71	65	61
Pneumatic Tools	79	73	69
Dozer	76	70	66
Rollers	74	68	64
Trucks	80	72	70
Pumps	74	68	64
Scrapers	81	75	71
Portable Generators	74	68	64
Backhoe	80	74	70
Grader	80	74	70

Source: Appendix D

Certain land uses are considered more sensitive to noise than others. Examples of these include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. It is expected that composite noise levels during construction at the nearest off-site sensitive residential uses to the south and west, and the school located to the east, would exceed 60 dbA due to their proximity to the Project site (approximately 50 feet). However, as noted above, construction noise would be short-term and intermittent and would cease once the Project is constructed. Additionally, construction would predominantly occur during daylight hours, and construction crews would implement best construction practices, including the following:

- Per the Fresno County Ordinance Code Section 8.40.060, construction activities should not occur outside the hours of 6:00 a.m. to 9:00 p.m. Monday through Saturday and between 7:00 a.m. to 5:00 p.m. on Saturday and Sunday.
- All construction equipment shall be properly maintained and muffled as to minimize noise generation at the source.
- Noise-producing equipment shall not be operating, running, or idling while not in immediate use by a construction contractor.
- All noise-producing construction equipment shall be located and operated, to the extent possible, at the greatest possible distance from any noise-sensitive land uses.
- Locate construction staging areas, to the extent possible, at the greatest possible distances from any noise-sensitive land uses.

As such, impacts resulting from construction activities would be less than significant.

Operational Noise Impacts

EXTERIOR NOISE EXPOSURE

The City Noise Element establishes a 60 dB Ldn criterion within outdoor activity areas (backyards) of single-family homes. The Project site traffic noise exposure for future (2046) traffic conditions was calculated to be approximately 60 dB Ldn within the closest lots along Sout Buttonwillow Avenue. The inclusion of Mitigation Measures NSE-1, which requires the construction of a sound wall along the Project roadway frontage along South Buttonwillow Avenue, would provide acoustical noise shielding within the nearest backyards to the roadway and reduce exterior noise level exposure to 54 dB Ldn.

INTERIOR NOISE EXPOSURE

The City of Reedley interior noise level standard is 45 dB Ldn. The worst-case noise exposure within the proposed residential development would be approximately 60 dB Ldn (2046 conditions). This means that the proposed residential construction must be capable of providing a minimum outdoor-to-indoor noise level reduction (NLR) of approximately 15 dB ($60-45=15$). It may be assumed that residential construction methods complying with current building code requirements will reduce exterior noise levels by approximately 25 dB if windows and doors are closed, requiring that it be possible for windows and doors to remain closed for sound insulation. The installation of air conditioning or mechanical ventilation is included as part of the Project and would ensure windows and doors can remain closed for sound insulation.

With implementation of Mitigation Measure NSE-1, long-term operational impacts would be reduced to a less-than-significant level.

MITIGATION MEASURE(S)

MM NSE-1: A sound wall shall be constructed to a minimum height of 6 feet along the South Buttonwillow Avenue Project site frontage. The sound wall shall be turned inward at Lot 1, Lot 98, Lot 99, and Lot 109. Suitable construction materials include concrete blocks, masonry, or stucco on both sides of a wood or steel stud wall. Prior to the issuance of building permits, plans and specifications shall include the identification of the required sound wall location, height, and construction materials.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.13b – Would the Project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Construction

The dominant sources of man-made vibration are sonic booms, blasting, pile driving, pavement breaking, demolition, diesel locomotives, and rail-car coupling. None of these activities is anticipated to occur with the construction or operation of the proposed Project. Construction activities, in general, can have the potential to create ground-borne vibrations. It is unlikely that any blasting or pile-driving would be required in connection with the construction of the Project. Construction activities most likely to cause vibration include heavy construction equipment. Therefore, the potential for ground-borne vibrations to occur as part of the construction of the Project is considered minimal.

The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations (Federal Highway Administration (FHWA), U.S. Department of Transportation 2017). In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 inch/second) appears to be conservative even for sustained pile driving. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and the underground geological layer between the vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The typical vibration produced by construction equipment is illustrated in the table below.

Table 3.4.13-4
Typical Vibration Levels for Construction Equipment

Equipment	Reference peak particle velocity at 25 feet (inches/second) ¹	Approximate peak particle velocity at 100 feet (inches/second) ²
Loaded trucks	0.076	0.010
Vibratory compactor/roller	0.210	0.026

Notes:

1 – Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, Table 12-2.

2 – Calculated using the following formula:

$$PPV_{\text{equip}} = PPV_{\text{ref}} \times (25/D)^{1.5}$$

where: PPV (equip) = the peak particle velocity in inches/second of the equipment adjusted for the distance PPV (ref) = the reference vibration level in inches/second from Table 12-2 of the FTA Transit Noise and Vibration Impact Assessment Guidelines

D = The distance from the equipment to the receiver

As indicated above, based on the FTA data, vibration velocities from typical heavy construction equipment that would be used during Project construction range from 0.076 to 0.210 inch-per-second peak particle velocity (PPV) at 25 feet from the source of activity. The

closest sensitive receptors are those existing on-site single-family residences. The remaining single-family residences are located approximately 55 feet from the Project boundary. With regard to the proposed Project, ground-borne vibration would be generated during site clearing and grading activities on-site, facilitated by the implementation of the proposed Project. It should be noted that 0.2 inch-per-second PPV is a conservative threshold, as that is the construction vibration damage criteria for non-engineered timber and masonry buildings. Buildings within the Project area would be better represented by the 0.5 inch-per-second PPV significance threshold (construction vibration damage criteria for reinforced concrete, steel, or timber buildings). Therefore, vibration impacts associated with construction are anticipated to be less than significant.

Operation

Once constructed, the Project would not result in any activities that would create ground-borne vibrations. Thus, the proposed Project would not result in the exposure of persons to sensitive receptors or generate excessive ground-borne vibration or ground-borne noise levels. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.13c – 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?

Airport-related noise levels are primarily associated with aircraft engine-related noise made while aircraft are taking off, landing, or idling their engines while still on the ground. The closest airport to the proposed Project site is Reedley Municipal Airport, located approximately 4.6 miles north of the Project site. The Project site is located outside of the 65 dBA Community Noise Equivalent Level (CNEL) airport noise impact zone and is not within the airport influence area (City of Reedley 2014, Fresno County Airport Land Use Commission 2023). Therefore, the Project would not be adversely affected by airport/airfield noise, nor would the Project contribute to or result in adverse airport/airfield noise impacts.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
3.4.14 - POPULATION AND HOUSING				
Would the Project				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

Impact #3.4.14a – Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

As indicated in the General Plan, the Project site is designated for residential development. As part of the Project, the proposal includes a General Plan Amendment to change the land use designation of approximately 3.5 acres from High Density Residential to Low Density Residential and does not significantly change the intent for development of this portion of the City. As previously noted, the Project would result in the development of new single-family residences and includes the development of the associated street improvements and utility infrastructure to meet City requirements and provide additional housing opportunities for the City's current and future residents. The proposed Project would include population growth as planned and expected by the General Plan and allow the City to meet its RHNA allocation goals. Therefore, although population growth would occur as a result of the Project, this growth is not unplanned and would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.14b – Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The Project site is located on a currently vacant site and does not propose the demolition or removal of existing people or housing. The Project site will not displace existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, the Project would have no impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

There would be *no impact*.

Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.15 - PUBLIC SERVICES

Would the Project:

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services:

(i) Fire protection?	☐	☐	☒	☐
(ii) Police protection?	☐	☐	☒	☐
(iii) Schools?	☐	☐	☒	☐
(iv) Parks?	☐	☐	☒	☐
(v) Other public facilities?	☐	☐	☒	☐

Discussion

Impact #3.4.15a(i) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services - Fire Protection?

As noted previously, the RFD is the primary fire protection provider within the City, and the FCFPD provides fire protection to the unincorporated portions of the Planning Area. As a result of a mutual aid agreement between the two agencies, the City's Fire Department may be requested to provide emergency backup service in the unincorporated area, and Fresno County may be requested to provide emergency backup service to the City. The nearest City Fire Department station is located approximately 0.9 miles west of the Project site at 1060 D Street, Reedley, CA.

The RFD receives funding through a public safety sales tax override, which supports staffing, facility maintenance and equipment purchase, and also receives funding from development impact fees, which may be used for the purchase of land and construction of new facilities.

The General Plan has adopted policies and actions that require adequate infrastructure for fire suppression, and new development is provide or pay for its fair share of public facility and infrastructure improvements. Additionally, development is expected to comply with applicable CBC fire code and all applicable development regulations and pay all required impact fees.

Fire hydrants would also be located and installed per the City standards. The Project would install the required infrastructure to meet water supply demands for municipal fire protection services. These design standards, coupled with existing fire protection infrastructure, would provide for proper fire suppression services on-site. By meeting these standards and incorporating needed design features in the Project design, no additional fire protection services would be required. Therefore, the Project would not increase the need for such services beyond the baseline condition. The construction and operation of the proposed Project is not expected to increase the risk of fires on and adjacent to the Project site and is not expected to require the provision of new or altered fire protection facilities. Therefore, the impact would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.15a(ii) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Police Protection?

The Reedley City Police Department (RCPD) provides law enforcement services to the City, and the Fresno County Sheriff's Department provides service in the unincorporated areas surrounding the City. The nearest police station to the Project site is located approximately 1.2 miles west of the Project site.

The Project will increase the local population by developing a 166-lot single-family residential development. The resulting impacts on RCPD services related to acceptable service ratios, response times, or other performance objectives of police protection services are anticipated to be impacted. However, development impact fees paid by the Project developer would serve to mitigate any incremental impact caused by the Project. As such, impacts related to police protection would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.15a(iii) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Schools?

Public elementary and secondary education in the community is provided by the Kings Canyon Unified School District (KCUSD). Within the City, the majority of the area is serviced by KCUSD. There is a small portion of the study area at the southwest corner of the City that is within the Clay Union School District. The nearest school is Silas Bartsch School (TK-8), located immediately east of the Project site. The U.S. Census indicates that the average household size is 3.48 (U.S. Census Bureau 2023). Assuming two parents within the household, an estimated 246 students (1.48 x 166 units) could be generated as a result of the Project.

The increased population generated by the proposed Project would increase the number of students attending local schools and could result in significant impacts to these facilities by requiring new facilities. The developer will be required to pay the appropriate school impact fees in order to receive building permits. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed “full and complete school facilities mitigation.” School districts would utilize the General Plan and codes to establish new school sites and make decisions on school amenities and facility size. As such, the payment of school impact fees would mitigate any increased impact on school facilities, and the impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.15a(iv) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Parks?

The City operates and manages approximately 72 acres of developed parkland and trails. The City plans for parkland needs based on a standard of four acres of parkland per 1,000 residents. Currently, the Community Services Department manages parklands that in total constitute about 2.75 acres of parkland per 1,000 residents.

The proposed Project would construct a 166-lot single-family residential subdivision that could increase the demand for park services and nearby recreational facilities. However, the proposed Project would be required to pay development impact fees for park and recreation facilities pursuant to General Plan Policy COSP 4.18.2 and the City's Municipal Code at the time building permits are obtained. Therefore, the proposed Project would not result in a substantial adverse impact associated with the provision of additional park facilities, and impacts to parks would represent a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.15a(v) – Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or to other performance objectives for any of the public services – Other Public Facilities?

See Impact #3.4.15a(i) through (iv) above.

The closest library to the Project site is located approximately one mile west of the Project site. The nearest hospital to the Project site are located 1.3 miles northwest.

As noted in Impact #3.4.14a, the Project does not promote unplanned growth or development. As such, the development of the Project will minimally increase the demand for other public services, such as libraries and health services. However, the increase in demand does not, in itself, require the construction of additional facilities. As such, impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
3.4.16 - RECREATION				
Would the Project:				
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 that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Discussion

Impact #3.4.16a – Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

As noted above, the proposed Project intends to develop a 166-lot single-family residential development that would result in the increase use of existing neighborhood and regional parks as an increase in local population would occur. Development of the proposed Project would require payment of in-lieu fees for parkland dedication to the Recreation and Park District in compliance with Government Code Section 66477 (Quimby Act), which would reduce potential impacts to less-than-significant levels.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.16b – Would the Project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

See Impact #3.4.16a above. Impacts would be less than significant, and no mitigation is required.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.17 - *TRANSPORTATION*

Would the Project:

a.	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒	☐	☐
b.	Conflict or be inconsistent with CEQA Guidelines 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?	☐	☐	☒	☐

Discussion

The discussion below is based on the Traffic Study completed for the Project, attached as Appendix E (Ruettgers and Schuler 2025).

Impact #3.4.17a – Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Transit

The City of Reedley has multiple public transportation options, including:

- The City of Reedley's Community Services Department runs an advance reservation van, and on-call door-to-door van service. The twelve-passenger vans operate Monday through Friday between the hours of 7:30 a.m. to 4:30 p.m. These vans provide service to the downtown stores and offices (including City Hall, Post Office and Library), the Hot Meals program at the Community Center, the shopping centers at Buttonwillow and Manning Avenues, the Adventist Medical Center Hospital and the other locations within a two-mile radius of Reedley. The vans are also used to transport children from house to school.

- Reedley College operates a bus which connects Sanger, Fowler, Selma, and Parlier with the College. The Kings Canyon Unified School District also provides bus service within its service area. However, both operations are limited solely to students.
- Fresno County Regional Transportation Authority (FCRTA) operates Orange Cove Transit, a bus service that runs Monday through Friday, twice a day each way, from Orange Cove to the City of Fresno. There are three stops in the City of Reedley at Manning and Buttonwillow, East and Springfield, and Manning and Reed.
- Dinuba Area Regional Transit (DART) operates a bus that runs from Reedley College, Adventist Medical Center Hospital, and Palm Village to the Dinuba Transit Center. The service operates at different times, ranging from five times a day during the school year to seven times a day in the summer.

For reference, the Manning and Buttonwillow stop for the FCRTA service is located approximately 0.3 miles north of the Project site.

Bicycle/Pedestrian Facilities

The Active Transportation and Parkway Plan (City of Reedley 2024) and the Circulation Element of the General Plan and the City adopted the Bicycle and Pedestrian Mobility Plan (City of Reedley 2019) consists of an assessment and plan to develop a bikeway and pedestrian system that can best satisfy the needs of its residents in an efficient and effective manner. The City of Reedley has three classifications of bikeways: bike paths, bike lanes, and bike routes, based on the degree of exclusivity with which the facility is preserved for bicycle use:

Bike Path – is a Class 1 facility, which is a special pathway facility for the exclusive use of bicycles, separated from motor vehicle facilities by space or a physical barrier. A bike path may be located on a portion of a street or highway right-of-way not related to a motor vehicle facility; it may be grade separated or have street crossings at designated locations. A bike path is identified with guide signing and may also have pavement markings. An example of a Class 1 facility is the Reedley Rail Trail/Parkway, which provides a separate bike and pedestrian trail.

Bike Lane – is a Class 2 facility, which is a lane on a paved area of road for preferential bicycle use. It is usually located along the right edge of a paved road area or between the parking lane and the first motor vehicle lane. A bike lane is identified by “Bike Lane” or “Bike Route” guide signing, special lane lines, and other pavement markings. Bicycles have exclusive use of the bike lane, but must share the facility with motor vehicles and pedestrians crossing it.

Bike Route – is a recommended route for bicycle travel along an existing right-of-way which is signed but not striped.

In addition to the City Bicycle Transportation Plan, the County of Fresno adopted an update of the Fresno County Regional Bicycle Master Plan to provide regional connectivity to the

unincorporated areas of Fresno County. The Fresno County Regional Bicycle Master Plan identifies four bikeway routes affecting Reedley, which are located or proposed to be located on Manning Avenue Corridor, the Kings River Loop Trail Corridor, Reed Bikeway, and the Reedley Trail along the old AT&SF rail corridor. None of these facilities would be impacted by Project development.

Under the City Bicycle and Pedestrian Mobility Plan, Class II bikeway (Bike Lanes) are planned for S. Buttonwillow Avenue west of the Project site and E. Springfield Avenue to the south. The Project is not anticipated to conflict with the anticipated improvements for bike and pedestrian facilities as proposed under the City's Bicycle and Pedestrian Mobility Plan.

Roadways

The prepared Traffic Study evaluated the potential traffic impact of the proposed residential development on City roadway and intersections. A total of nine intersections are evaluated in the Traffic Study analysis.

The existing roadways providing the main circulation in the vicinity of the Project include the following as designated under the City of Reedley General Plan Circulation Element:

- Buttonwillow Avenue is a north-south major arterial that extends throughout the western portion of the City of Reedley. In the vicinity of the project, there exists a two-lane roadway that provides access to agricultural and residential land uses.
- Columbia Avenue is a primarily north-south arterial that extends south from Manning Avenue in the City of Reedley. In the vicinity of the project, it exists as a four-lane roadway and provides access to commercial and residential land uses.
- Dinuba Avenue is an east-west arterial that extends through the southern portion of the City of Reedley. In the vicinity of the project, there exists a two-lane roadway that provides access to industrial and residential land uses.
- East Avenue is a north-south collector that extends from Manning Avenue to Dinuba Avenue in the City of Reedley. In the vicinity of the project, it exists as a two-lane roadway and provides access to residential land uses.
- Manning Avenue is an east-west major arterial that extends throughout the City of Reedley. In the vicinity of the project, it exists as a two-lane roadway and provides access to agricultural, commercial, and residential land uses.
- North Avenue is an east-west collector that extends from Reed Avenue in the City of Reedley. In the vicinity of the project, it exists as a two-lane roadway and provides access to agricultural, commercial, educational, and residential land uses.
- Springfield Avenue is an east-west collector that extends from East Avenue to Buttonwillow Avenue in the City of Reedley. In the vicinity of the Project, it exists as a two-lane roadway and provides access to residential land uses.

- Tobu Avenue is a future north-south collector that extends through the eastern portion of the City of Reedley. It is proposed to provide access to residential land uses.
- Zumwalt Avenue is a north-south arterial that extends throughout the eastern portion of the City of Reedley. In the vicinity of the Project, it exists as a two-lane roadway and provides access to agricultural and residential land uses.

The following intersections were evaluated as part of the Traffic Study:

- N. East Avenue and Manning Avenue
- N. Columbia Avenue and Manning Avenue
- S. Buttonwillow Avenue and Manning Avenue
- Tobu Avenue and Manning Avenue
- S. Buttonwillow Avenue and North Avenue
- Zumwalt Avenue and North Avenue
- S. Buttonwillow Avenue and E. Springfield Avenue
- S. Buttonwillow Avenue and Dinuba Avenue
- Project Entrance and North Avenue

Project trip generation volumes were estimated using the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition. Trip rates, equations and directional splits for ITE Land Use Code 210 (Single-Family Detached Housing) were used to estimate Project trips for weekday peak hours of adjacent street traffic based on Project information. The trip generation volumes are summarized in Table 3.4.17-1 below.

**Table 3.4.17-1
Trip Generation**

Development Type (ITE Code)	Variable	Daily Trips		AM Peak Hour Trips			PM Peak Hour Trips		
		ADT Rate	ADT	Rate	In% Split / Trips	Out% Split / Trips	Rate	In% Split / Trips	Out% Split / Trips
Single-Family detached Housing (210)	166 Dwelling Units	eq	1,608	eq	25% / 30	75% / 88	eq	63% / 101	37% / 59

Source: Appendix E

Although the State of California does not recognize traffic congestion and delay as an environmental impact per CEQA, the City General Plan Circulation Element designates a level of service (LOS) threshold of C or better. “Level of Service” (LOS) is a description of the ability of a street segment or intersection to accommodate levels of traffic demand. LOS is a qualitative measure of traffic operating conditions, whereby a letter grade “A” through “F” is assigned to an intersection or roadway segment representing worsening representing progressively worsening traffic conditions LOS A, typically represents unrestricted free flow of traffic and excellent comfort for motorists, to LOS F, which represents highly congested

forced flow conditions where traffic exceeds the capacities of streets. Tables 3.4.17-2 and 3.4.17-3 provide criteria for unsignalized and signalized intersection LOS.

Table 3.4.17-2
LOS Criteria, Unsignalized Intersection

Level of Service	Average Control Delay (sec/veh)	Expected Delay to Minor Street Traffic
A	≤ 10	Little or no delay
B	> 10 and ≤ 15	Short delays
C	> 15 and ≤ 25	Average delays
D	> 25 and ≤ 35	Long delays
E	> 35 and ≤ 50	Very long delays
F	> 50	Extreme delays

Source: Appendix E

Table 3.4.17-3
LOS Criteria, Signalized Intersection

Level of Service	Average Control Delay (sec/veh)	Volume-to-Capacity Ratio
A	≤ 10	< 0.60
B	> 10 and ≤ 20	0.61 - 0.70
C	> 20 and ≤ 35	0.71 - 0.80
D	> 35 and ≤ 55	0.81 - 0.90
E	> 55 and ≤ 80	0.91 - 1.00
F	> 80	> 1.00

Source: Appendix E

The intersection analysis utilized the anticipated trip generation of the Project in addition to annual growth rates based on a comparison of regional travel demand model volumes from the Fresno County Office of Government (FCOG) between the years 2018 and 2035. Based on the modeling, Tables 3.4.17-4 and 3.4.17-5 provide the intersection LOS for AM and PM Peak Hour between the years 2025 and 2045 with and without Project conditions.

Table 3.4.17-4
Intersection LOS AM Peak Hour

#	Intersection	Control Type	2025	2025+ Project	2030	2030+ Project	2045	2045+ Project	2045+ Project w/Improvements
1	N. East Avenue and Manning Avenue	NB	C	C	C	C	F (108.0)	F (121.2)	-
2	N. Columbia Avenue and Manning Avenue	Signal	B	B	B	B	B	B	-

#	Intersection	Control Type	2025	2025+ Project	2030	2030+ Project	2045	2045+ Project	2045+ Project w/Improvements
3	S. Buttonwillow Avenue and Manning Avenue	Signal	C	C	C	C	C	C	-
4	Tobu Avenue and Manning Avenue	NB	-	B	-	B	-	B	-
5	S. Buttonwillow Avenue and North Avenue	EB WB Signal	B - -	C C -	C - -	C C -	C - -	D (27.4) D (25.7) -	- - A
6	Zumwalt Avenue and North Avenue	EB	B	B	C	C	F (73.9)	F (>300)	-
7	S. Buttonwillow Avenue and E. Springfield Avenue	EB	C	C	C	C	E (36.1)	E (41.3)	-
8	S. Buttonwillow Avenue and Dinuba Avenue	Roundabout	B	B	B	B	C	C	-
9	Project Entrance and North Avenue	NB	-	A	-	A	-	A	-

Source: Appendix E

Table 3.4.17-5
Intersection LOS PM Peak Hour

#	Intersection	Control Type	2025	2025+ Project	2030	2030+ Project	2045	2045+ Project	2045+ Project w/Improvements
1	N. East Avenue and Manning Avenue	NB	C	C	D (26.5)	D (27.6)	F (201.3)	F (229.6)	-
2	N. Columbia Avenue and Manning Avenue	Signal	B	B	B	B	C	C	-
3	S. Buttonwillow Avenue and Manning Avenue	Signal	C	C	C	C	D (36.5)	D (46.9)	-
4	Tobu Avenue and Manning Avenue	NB	-	B	-	B	-	B	-
5	S. Buttonwillow	EB WB	B -	B C	B -	B C	C -	C D (29.9)	-

#	Intersection	Control Type	2025	2025+ Project	2030	2030+ Project	2045	2045+ Project	2045+ Project w/Improvements
	Avenue and North Avenue	Signal	-	-	-	-	-	-	B
6	Zumwalt Avenue and North Avenue	EB	A	A	A	A	B	B	-
7	S. Buttonwillow Avenue and E. Springfield Avenue	EB	C	C	C	C	D (31.1)	D (32.7)	-
8	S. Buttonwillow Avenue and Dinuba Avenue	Roundabout	B	B	B	C	D (31.1)	D (33.7)	-
9	Project Entrance and North Avenue	NB	-	A	-	A	-	A	-

Source: Appendix E

As depicted in Tables 3.4.17-4 and 3.4.17-5, five intersections would operate below the LOS C standard for the year 2030 and/or beyond. These intersections include N. East Avenue and Manning Avenue, N. Columbia Avenue and Manning Avenue, S. Buttonwillow Avenue and North Avenue, S. Buttonwillow Avenue and E. Springfield Avenue, and S. Buttonwillow Avenue and Dinuba Avenue. Only one intersection, S. Buttonwillow Avenue and North Avenue, will be directly impacted by the Project and result in a LOS below C. To mitigate the impacts that the Project will potentially have on the S. Buttonwillow Avenue and North Avenue intersection, signalization of the intersection by 2045 will bring the LOS of the intersection to LOS A during the AM Peak Hour and LOS B during the PM Peak Hour. To mitigate the intersection impacts, the Project will be required to pay their equitable share of costs associated with signalization improvements for the South Buttonwillow Avenue and North Avenue intersection. Therefore, payment of their equitable share of 20.51 percent of the cost to signalize the Buttonwillow Avenue and North Avenue intersection will be implemented as MM TRA-1. As determined, signalization of the intersection would allow the intersection to operate at acceptable LOS.

The remaining intersections are anticipated to operate below the City's LOS C threshold based on the estimated growth of the City. As shown in Tables 3.4.17-4 and 3.4.17-5, the AM and PM Peak Hours for these intersections are anticipated to operate at LOS D or F during non-project scenario years. The City has adopted transportation impact fees to fund roadway improvements needed to accommodate growth based on the General Plan buildout. Therefore, developers are required to pay development impact fees at the time of permit issuance. The Project is expected to pay development impact fees for single-family residential units, which in turn will allow the City to fund and improve affected intersections as a result of the General Plan buildout.

Development of the Project site is required to comply with City standards for driveway development. Construction-related traffic is anticipated to be short-term and would not significantly impact existing or planned circulation infrastructure. The proposed operation of the Project does not require on-site employees and would have minimal impact on the City's circulation system. The proposed Project will not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, with implementation of MM TRA-1 and payment of applicable transportation development impact fees, the Project would allow City intersections to operate at an acceptable LOS and result in a less-than-significant impact.

MITIGATION MEASURE(S)

MM TRA-1: The Project proponent shall pay its equitable share cost percentage for intersection improvements at the listed intersection. Payment amount of the equitable share costs shall be determined by the City of Reedley and paid prior to the issuance of building permits.

- a. Signalization of South Buttonwillow Avenue and North Avenue: 20.51 percent.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.17b – Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Vehicle Miles Traveled (VMT) Evaluation

The CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on Projects within transit priority areas and shift the focus from driver delay to a reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle Miles Traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The VMT analysis was conducted in accordance with *Fresno County SB 743 Implementation Regional Guidelines* (Appendix E). The VMT analysis involved comparing an estimate of VMT attributable to the Project to the VMT thresholds contained in the *Fresno County SB 743 Implementation Regional Guidelines* and assessing whether the Project VMT would result in a significant transportation impact under CEQA. The VMT threshold for residential use is the exceedance of 13 percent below the existing regional average or 87 percent of the regional VMT average. Table 3.4.17-6 provides the results of the VMT analysis.

**Table 3.4.17-6
VMT Analysis Results**

Land Use	VMT Per Capita		Project	Significant Impact	Reduction Needed
	Regional	Threshold			
Residential	17.4	16.1	14.0	No	-15.0%

Source: Appendix E

As shown in Table 3.4.17-6, the Project VMT per capita is less than the significance threshold. Therefore, the Project would result in a less-than-significant VMT impact, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.17c – Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Project construction is not anticipated to result in an increased hazard related to traffic and transportation. The Project would be required to apply for and receive the appropriate permits for any work to occur within City rights-of-way and be expected to comply with any conditions to minimize construction traffic related hazards. The City also requires the Project to develop East North Avenue that would eventually connect to the future alignment of Tobu Avenue to the west.

The Project will not include any geometric design features or incompatible uses that would substantially increase hazards. All road improvements would be constructed according to City road design and construction standards. Additionally, the Project is subject to review by City staff, ensuring that the Project design complies with applicable roadway design standards.

Therefore, the construction and operation of the Project will have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.17d – Would the Project result in inadequate emergency access?

The proposed Project would be required to comply with all emergency access requirements adopted and set forth in the City Municipal Code. Project site development will be required to comply with applicable emergency access standards from local and State authorities.

Project-related traffic would not affect emergency access to the Project site or any other surrounding locations. The proposed Project would not require permanent closures of public roads, which could inhibit access by emergency vehicles. For these reasons, construction and operation would have a less-than-significant impact on emergency access.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

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

Discussion

The discussion below is based on the Cultural Resources Report completed for the Project, attached as Appendix C (QK 2025b).

Impact #3.4.18a(i) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is – 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)?

See the discussion presented in Section 3.4.5 - *Cultural Resources*, Impacts #3.4.5a through 3.4.5c.

On April 24, 2025, pursuant to Public Resources Code §21080.3.1 and Government Code §65300 *et seq*, letters were sent to each of the Native American tribes within the geographic area as identified by the NAHC (see Appendix C). The letters included a Project description and location maps. One response has been received from the Table Mountain Rancheria, declining consultation.

Upon any ground-breaking activity, there is the possibility of uncovering an object of cultural value. Mitigation Measures CUL-1 through CUL-3 shall be implemented if any artifacts or human remains are discovered. Therefore, the Project would have a less-than-significant impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures CUL-1 through CUL-3.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

Impact #3.4.18a(ii) – Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is – a resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

See discussion for Impacts #3.4.5a through #3.4.5c and Impact #3.4.18a(i) above.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures CUL-1 through CUL-3.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant with mitigation incorporated*.

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

Discussion

Impact #3.4.19a – Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Wastewater

Wastewater sewage services for the proposed Project would be provided by the City of Reedley. The proposed Project would connect to the existing wastewater service infrastructure. Wastewater from the Project site would be collected and transported to the City of Reedley wastewater treatment plant (WWTP). The WWTP has a treatment capacity

of to 7.0 million gallons per day (mgd). No significant increase in wastewater flows is anticipated as a result of construction activities on the Project site. Sanitary services during construction would be provided by portable toilet facilities, which transport waste off-site for treatment and disposal. Based on estimated water consumption for the Project, wastewater generation is estimated to be 156 gallons per capita/day on average. Based on the capacity of existing infrastructure, wastewater generation associated with the proposed Project is not anticipated to exceed wastewater treatment requirements or exceed the available capacity to accommodate the increased wastewater flows from the proposed Project. The Project would be adequately served by the capacity and the existing wastewater conveyance system. The Project applicant would be required to cover payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the City's standards, specifications, and policies. As such, the proposed Project would not necessitate new or expanded wastewater facilities, the City would be able to accommodate the increased demand for wastewater services, and impacts would be less than significant.

Stormwater

The Project proposes the development of a new 166-lot single-family residential development. The proposed development would include the use of a two-acre on-site stormwater basin that would maintain stormwater on site and allow water to percolate back into the underlying aquifer, which would reduce potential strain on City infrastructure and Project impacts are anticipated to be less than significant.

Water

As noted in Impact #3.4.10b, water needed for construction will be obtained from the City, which obtains groundwater from wells located on land within the City. The current water distribution system is adjacent to the Project site. The construction process is estimated to take approximately 48 months. Construction water demands are estimated to be approximately 225 gpd/acre for the duration of construction or 12.21 acre-feet, which is equivalent to approximately 3,978,000 gallons. Bottled drinking water will be provided for crews during construction activities.

Initial construction water usage will be in support of site preparation and grading activities. During earthwork for grading of access road foundations, building foundations, and Project components, the principal use of water would be for compaction and dust control. Smaller quantities would be required for the preparation of the concrete required for foundations and other minor uses. After the earthwork activities, water will be used for dust suppression and normal construction water requirements that are associated with the construction of the buildings, internal access roads, and revegetation.

The long-term average day operational water demand will be for the residential users and is anticipated to be approximately 35.08 million gallons per year or 107.64 acre-feet per year for the total build out of the Project. This is based on each residential unit having an average

day water demand of 546 gallons per day across the entire buildout of 176 units for the Project.

As determined in Impact #3.4.10b, the water availability determined in the UWMP, water supply and demand under a normal year, a single dry year, and multiple dry year scenarios would be adequate to supply the City's needs. Furthermore, the development of the Project would not require the relocation or construction of new utility infrastructure, which could cause a significant environmental effect. As such, impacts would be less than significant.

Electricity and Telecommunications

Electricity services would be provided by the Pacific Gas and Electric Company (PG&E) and would be supplied through connections to existing service infrastructure. Telecommunication services for the Project would be provided by either AT&T or Comcast. Electric power and telecommunication facilities would require connections to the Project site. However, because the Project site is located within an urbanized area with existing facilities in close proximity, connection to these facilities would not cause significant environmental effects. As a result, the Project would result in a less-than-significant impact related to the relocation or construction of new or expanded utilities.

Natural Gas

Southern California Gas Company (SoCal Gas) is the area provider of natural gas (Southern California Gas Company 2025).. However, the Project will utilize all electric appliances, and no natural gas will be needed. There would be no Project impacts anticipated related to natural gas usage.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.19b – Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

As noted in Impact #3.4.10b, the UWMP indicates the City does not expect to have a water supply shortage through 2045 under normal or under drought conditions. The City's overall water supplies (wells) are resilient to water droughts and to water quality issues. The WSA prepared for the Project has provided the data and analysis needed to verify that a sufficient Project water supply is physically available, and that the Project water supply is in accordance with SB 610's normal year/dry year/multiple dry year requirements. The Project water demand is projected to increase by 35.08 MG and is approximately 1.25 percent of the City's available water supply. Therefore, compliance with existing regulations

and with UWMP recommendations and findings will ensure the resultant level of impact from development of the Project would be maintained at a less-than-significant level.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.19c – Would the Project result in a determination by the wastewater treatment provider that serves or may serve the Project that it has adequate capacity to serve the Project's Projected demand in addition to the provider's existing commitments?

See Impact #3.4.19a above.

Wastewater generation associated with the Project is not anticipated to exceed wastewater treatment requirements or exceed the available capacity to accommodate the increased wastewater flows from the proposed Project. The Project would be adequately served by the capacity and the existing wastewater conveyance system. Additionally, the Project is not expected to exceed wastewater treatment requirements of the Central Valley Regional Water Quality Control Board. No mitigation is required. In addition, the proposed Project would be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner that is compliant with the City's standards, specifications, and policies. As such, impacts would be less than significant. No mitigation is required.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.19d – Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

During construction, debris and waste generated that are not anticipated to contain hazardous materials would be disposed of by licensed waste haulers at the appropriate landfill.

Once constructed, the proposed Project would produce typical municipal refuse generated by residential uses. Waste would be placed in covered dumpsters and removed on a regular basis for disposal by the certified waste-handling contractor that services the City. Mid Valley Disposal would take household waste to the American Avenue landfill site, a Class III landfill.

The American Avenue Landfill (i.e., American Avenue Disposal Site 10-AA-0009) has a maximum permitted capacity of 32,700,000 cubic yards and a remaining capacity of 29,358,535 cubic yards, with an estimated closure date of August 31, 2031. The maximum permitted throughput is 2,200 tons per day (California Department of Resources Recycling and Recovery 2025).

Using a standard residential operational waste generation rate of 6.7 pounds/resident/day, which is calculated using AB 341's measurement system and a recycling rate of 37 percent, operation of the proposed Project would generate approximately 459 cubic yards of waste per year (6.7 pounds/resident/day x 176 residential units x 3 residents per household = 3,537.6 pounds/day / 2,000 pounds/ton = 1.76 tons/day x 365 days/year = 642 tons/year / 1.4 = 458.6 cubic yards/year) (California Department of Resources Recycling and Recovery 2019). The American Avenue disposal site has approximately 29.35 million cubic yards of remaining capacity and, thus, can accommodate the proposed Project's operational solid waste generation. Impacts from the Project construction would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.19e – Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

See discussion for Impact #3.4.19d.

The proposed Project would be required to provide solid waste and recycling services for residents pursuant to the California Solid Waste Reuse and Recycling Access Act of 1991. New municipal waste and recycling regulations, primarily SB 1383 focuses on reducing short-lived climate pollutants, particularly methane from organic waste, and increasing recycling rates. City residents are required to separate organic waste (food scraps, yard trimmings, food-soiled paper, etc.) from other waste and either subscribe to collection services or self-haul to appropriate facilities.

This service will be provided by Mid Valley Disposal. Furthermore, the proposed Project would be required to comply with all federal, state, and local statutes and regulations related to the handling and disposal of solid waste. Therefore, implementation of the proposed Project would result in a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
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3.4.20 - WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- | | | | | | |
|----|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. | Substantially impair an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| b. | Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration 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? | ☐ | ☐ | ☒ | ☐ |

Discussion

Impact #3.4.20a – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

See also Impact #3.4.9f regarding emergency response.

According to CAL FIRE, the Project site is located within an LRA Unzoned designated area (Cal Fire 2007). Given this designation, the Project site is outside of areas identified by CAL FIRE as having substantial or very high wildfire risk. As noted previously, the Project will adhere to the standards set forth in the City Municipal Code. The Project would also comply with the appropriate local and State requirements regarding emergency response plans and access. The proposed Project would not inhibit the ability of local roadways to continue to accommodate emergency response and evacuation activities.

The proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20b – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

The Project site is not located within a State Responsibility Area (SRA). The Project site is located approximately 7.75 miles east of the nearest SRA. The Project will implement State and local fire code requirements. As such, the Project would not exacerbate the risk of exposure of Project occupants to wildfire and impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20c – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

See Impacts #3.4.9a and g, #3.4.20a and b above.

The residential subdivision would be accessed via South Buttonwillow Avenue and the future East North Avenue. All road improvements would be completed in accordance with the applicable Public Works standards and specifications. Additionally, the Project would extend service laterals for potable water and other utilities from existing lines. Furthermore, the Project would be required to be consistent with the California Fire Code and City Subdivision Regulations (Title 11). Therefore, the Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment, and impacts would be less than significant.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

Impact #3.4.20d – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

See Impacts # 3.4.9a and g, #3.4.20a, b, and c above.

The Project is not located near an SRA or lands classified as very high fire hazard severity zones. The City and the Project site are topographically flat land. There are no slopes on or near the property, and the Project would not expose the people or structures to significant risks from downslope or downstream flooding or landslides due to the result of runoff, post-fire instability, or drainage changes. Therefore, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

No mitigation is required.

LEVEL OF SIGNIFICANCE

Impacts would be *less than significant*.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than- Significant Impact	No Impact
3.4.21 - MANDATORY FINDINGS OF SIGNIFICANCE				
a. Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)	☐	☒	☐	☐
c. Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

Impact #3.4.21a – Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

As evaluated in this IS/MND, the proposed Project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. With implementation of the mitigation measures recommended in this

document, the proposed Project would not have the potential to degrade the quality of the environment, significantly impact biological resources, or eliminate important examples of the major periods of California's history or prehistory. Therefore, with the following mitigation measures, the Project would have a less-than-significant impact.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-8, MM CUL-1 and MM CUL-3, and MM GEO-2.

LEVEL OF SIGNIFICANCE

The Project would have a *less-than-significant impact with mitigation incorporated*.

Impact #3.4.21b - Does the Project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a Project are significant when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects.)?

As described in the impact analyses in Sections 3.4.1 through 3.4.20 of this IS/MND, any potentially significant impacts of the proposed Project would be reduced to a less-than-significant level following the incorporation of the mitigation measures listed. The proposed Project would not otherwise combine with impacts of related development to add considerably to any cumulative impacts in the region. With mitigation, the proposed Project would not have impacts that are individually limited but cumulatively considerable. Therefore, the Project would have a less-than-cumulatively-considerable impact with mitigation incorporated.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-8, MM CUL-1 through MM CUL-3, MM GEO-1 and MM GEO-2, MM NSE-1, and TRA-1.

LEVEL OF SIGNIFICANCE

The Project would have a *less-than-significant impact with mitigation incorporated*.

Impact #3.4.21c - Does the Project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

All of the Project’s impacts, both direct and indirect that are attributable to the Project were identified and mitigated. The Project mitigation measures will substantially reduce or eliminate the impacts of the Project. Therefore, the proposed Project would not either directly or indirectly cause substantial adverse effects on human beings because all potentially adverse direct impacts of the proposed Project are identified as having no impact, less-than-significant impact, or less-than-significant impact with mitigation.

MITIGATION MEASURE(S)

Implementation of Mitigation Measures MM BIO-1 through MM BIO-8, MM CUL-1 through MM CUL-3, MM GEO-1 and MM GEO-2, MM NSE-1, and TRA-1.

LEVEL OF SIGNIFICANCE

The Project would have a *less-than-significant impact with mitigation incorporated*.

SECTION 4 - LIST OF PREPARERS

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QK

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WJV Acoustics, Inc. (Acoustical Analysis)

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SECTION 6 - MITIGATION MONITORING AND REPORTING PROGRAM

RESERVED