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# MEMORANDUM

**DATE:** December 22, 2025

**TO:** Laura Friesen, Assistant Planner
Community Development Department, City of Reedley

**FROM:** Brianna Shaw, Project Manager
LSA Associates, Inc.

**SUBJECT:** Response to Comments Memorandum for the Initial Study and Mitigated Negative Declaration for Tract Map 6331 Residential Project

This Response to Comments memorandum has been prepared to address comment letters received on the Initial Study/Mitigated Negative Declaration (IS/MND) for Tract Map 6331 Residential Project (proposed project).

The IS/MND was made available for public comment from October 30, 2025, until December 1, 2025. A total of five comment letters were received during the public review period and grouped by the classification of the commenter, as follows: State agencies (A), local agencies (B), and organizations and interested parties (C).

The comment letters were numbered consecutively following the letter designations using the format below. The letters were numbered, and comments within each letter were numbered consecutively after the hyphen.

| | |
|---|---|
| State Agencies | A#-# |
| Local Agencies | B#-# |
| Organizations and Interested Parties | C#-# |

In the following pages, the topic sections addressed in the comments and associated responses are enumerated to allow for cross-referencing of CEQA-related comments. To the extent that text within the comment letters has not been numbered, it indicates that the text does not raise substantive environmental issues or relate to the adequacy of the information or analysis within the IS/MND; therefore, no comment is enumerated, nor is a response required per California Environmental Quality Act (CEQA) Guidelines Sections 15088 and 15132. In addition, when general support or opposition is given for the proposed project, that comment is noted but no further analysis is provided in the response, as the commenter is not questioning the adequacy of the information or analysis within the IS/MND. However, it should be noted that comments related to the merits of the proposed project are considered by decision-makers taking action on the proposed project.

Section A of this memorandum identifies the comment letters being addressed. Section B includes a matrix with a reproduction of each enumerated comment followed by responses to each comment. Each comment letter referenced in this memorandum is also attached with individual comments identified.

## A. COMMENT LETTERS

This memorandum includes a reproduction of the comment letters received on the IS/MND during the comment period, and individual comments within the comment letters are numbered consecutively. The comment letters received during the public review period on the IS/MND are provided in their entirety in Attachment A of this document.

### Table A: List of Comments Received

| | | |
|---|---|---|
| **State Agencies** | | |
| A1 | California Department of Toxic Substances Control | November 5, 2025 |
| A2 | California Department of Conservation, Geologic Energy Management Division | November 13, 2025 |
| **Local Agencies** | | |
| B1 | San Joaquin Valley Air Pollution Control District | November 24, 2025 |
| **Organizations and Interested Parties** | | |
| C1 | Pacific Gas and Electric Company, Plan Review | November 3, 2025 |
| C2 | Pacific Gas and Electric Company, Land Management | November 7, 2025 |

## B. COMMENTS AND RESPONSES

Written responses to the comment letters received on the Public Review Draft IS/MND are provided in Table B, below.

Where comments on the IS/MND raise concerns or issues requiring technical expertise such as those related to air quality, the responses to comments, like the initial analysis in the IS/MND, rely on the knowledge and professional analysis of qualified experts.

Where neither the comments received nor the responses to said comments provide new information identifying a new impact, or impact of greater severity, than that assessed in the Initial Study, pursuant to *State CEQA Guidelines*, Section 15088.5, no recirculation of the IS/MND is warranted.

Section 15204 of the *State CEQA Guidelines* provides direction for parties reviewing and providing comments, as follows:

> *In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.*

Regarding the focus of the Lead Agency review of public comments, Section 15204 (in part) states:

> *When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made…*

While comments expressing opinion or unsubstantiated narrative do not require response, they may provide important input to the process of reviewing the project overall and will be considered by City of Reedley decision-makers.

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| **State Agencies** | | |
| **A1** | **California Department of Toxic Substances Control (DTSC)** | |
| A1-1 | 1. When agricultural crops and/or land uses are proposed or rezoned for residential use, several contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required. These recommendations should be adhered to and become part of the environmental document. Please refer to the DTSC's Human and Ecological Risk Office (HERO) webpage for the most recent guidance and screening levels. | This comment is regarding potential contaminants of concern that can be president on agricultural land if pesticides and organochlorine pesticides were used on the property. A Phase I Environmental Site Assessment (ESA) will be performed for the project site prior to map recordation, as required by the City of Reedley. The developer of the project will comply with all local, State, and federal laws governing contaminants of concern. |
| A1-2 | 2. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. Furthermore, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing soil/fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the soil/fill and knowledge of prior land use. | Construction of the proposed project would include up to 100,000 cubic yards of cut and fill (see IS/MND, page 1-14). The proposed project would not require the import or export of soil as the project site would utilize the existing dirt on-site, as grading would occur to accommodate the proposed residential development, ancillary features, and roadway improvements, per the IS/MND (page 3-12). As such, this comment does not affect the adequacy or completeness of the IS/MND, nor does it raise an environmental issue; or necessitate the incorporation of additional information into the IS/MND. No further response is necessary. |
| A1-3 | 3. The City of Reedley should consider soil testing as mentioned in comment #1 (Comment A1-1). If, in the event any COC results are above DTSC residential screening levels, DTSC recommends the City of Reedley address the contaminations within the Project area through an Environmental Site Assessment and/or receive oversight from a self-certified local agency, DTSC or Regional Water Quality Control Board. If entering into one of DTSC's | A Phase I ESA will be performed for the project site prior to map recordation, as required by the City of Reedley. The developer of the project will comply with all local, State, and federal laws governing contaminants of concern. |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
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| | voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: Request for Agency Oversight Application. Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have anyquestions about the application portal, please contact the relevant RegionalBrownfield Coordinator for your Project. | |
| **A2** | **California Department of Conservation, Geologic Energy Management Division (CalGEM)** | |
| A2-1 | The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated October 31, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).<br><br>CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak. CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet | This comment letter identifies requirements for the appropriate abandonment of oil, gas, and/or geothermal wells. The comment letter provides specific guidelines and procedures related to the abandonment process and the abandonment responsibilities for existing and potential future property owners.<br><br>As identified on page 5 of this comment letter, CalGEM provided a summary of its Well Finder database for the project area (see: https://maps.conservation.ca.gov/doggr/wellfinder/). No wells were located within the project site or within the project area. As the project site does not include any oil, gas, or geothermal well, the abandonment procedures and practices identified by CalGEM are not applicable to the proposed project. As such, this comment does not affect the adequacy or completeness of the IS/MND, nor does it raise an environmental issue or necessitate the incorporation of additional information into the IS/MND. No further response is necessary. |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
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| | these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).<br><br>There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak.<br><br>CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.<br><br>PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:<br><br>1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently | |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
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| | perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.<br><br>2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.<br><br>3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.<br><br>Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators.<br><br>No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start. | |

## Table B: Comments and Responses Matrix

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| | CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:<br><br>1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.<br><br>2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.<br><br>As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues. | |
| **Local and Regional Agencies** | | |
| **B1** | **San Joaquin Valley Air Pollution Control District (SJVAPCD)** | |
| B1-1 | **Construction Emissions:** The District recommends, to further reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available construction equipment. | This comment suggests the use of the cleanest available construction equipment to further reduce impacts from construction-related diesel exhaust emissions. As stated in Tables 3.3.B and 3.3.C of the IS/MND, the emission of pollutants during construction or operation of the proposed project would not exceed established District significance thresholds. In the absence of any such exceedance, mitigation is not required. This comment does not affect the adequacy or completeness of the IS/MND, nor does it raise an |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
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| | | environmental issue. This comment does not require the incorporation of new information into the IS/MND. No further response is necessary. |
| B1-2 | **Vegetative Barries and Urban Greening:** There are residential units located west of the Project. The District suggests the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).<br><br>While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery. | This comment recommends that the City consider incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors.<br><br>The closest sensitive receptors include a single-family residential residence along South Buttonwillow, approximately 95 feet west of project site. The closest worker receptor is located southwest of the project site across South Buttonwillow Avenue and the closest schools to the project site are Silas Bartsch School and St. La Salle Private School.<br><br>As noted in the IS/MND (see Tables 3.3.B and 3.3.C), the construction and operation of the proposed project would not result in the exceedance of District thresholds for criteria pollutants. Furthermore, as detailed in Table 3.3.D of the IS/MND, the maximum cancer risk during construction for the sensitive maximally exposed individual (MEI) would be 6.81 in one million, which would not exceed the District's cancer risk threshold of 20 in one million. The worker MEI would be lower at 0.35 and the school MEI would be 0.05 in one million. The total chronic hazard index would be 0.006 for the sensitive MEI, 0.016 for the worker MEI, and less than 0.001 for the school MEI, which would be below the threshold of 1.0. The total acute hazard index would be nominal (0.000), which would also not exceed the threshold of 1.0.<br><br>As the proposed project would not result in the exceedance of District emission thresholds or health risk thresholds, no additional consideration of project features to reduce air quality impacts is required. This comment does not affect the adequacy or completeness of the IS/MND, does not raise an environmental issue, and does not require the incorporation of new information into the IS/MND; therefore, no further response is necessary. |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| B1-3 | **District Rules and Regulations:** The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.<br><br>The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888. | This comment provides an introduction to information on SJVAPCD's permits and permitting requirements that follows in Comment B1-4 through Comment B1-9. This comment does not address the adequacy or completeness of the IS/MND, does not raise an environmental issue, and does not require the addition of new information into the IS/MND; no further response is necessary. |
| B1-4 | **District Rule 9510 - Indirect Source Review (ISR):** The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 50 dwelling units of residential development.<br><br>The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.<br><br>Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510 so that | This comment provides information related to the District's Rule 9510 (Indirect Source Rule). Rule 9510 is discussed in the IS/MND (page 3-18) as an applicable law and regulation related to implementation of the proposed project.<br><br>As stated in the IS/MND (page 3-8), the air quality impact analysis evaluates potential air quality impacts related to the annexation of the 56.27-acre annexation area and development of the 18.79-acre project site (with 108 single-family residences). Impacts to air quality due to potential future development of Assessor's Parcel Number (APN) 363-070-46 would be evaluated under separate CEQA analysis at the time when an application is submitted for development within the annexation area.<br><br>The air modeling for the proposed project (see IS/MND, Appendix C) assumed implementation of Rule 9510 requirements, which would reduce operational emissions of nitrogen oxide ($NO_X$) and particulate matter less than 10 microns in size ($PM_{10}$) by 33.3 percent and 50 percent, respectively. As provided in Tables 3.3.B and 3.3.C of the Initial Study, emissions of $NO_X$ and PM during construction and |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| | proper mitigation and clean air design under ISR can be incorporated into the Project's design. One AIA application should be submitted for the entire Project.<br><br>Information about how to comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview The AIA application form can be found online at:<br><br>https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/<br><br>District staff is available to provide assistance, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org. | operation of the proposed residential component of the project would not exceed established District thresholds.<br><br>Furthermore, consistent with District Regulation V11, Regulatory Compliance Measure (RCM) AIR-1 identifies measures and practices that will be implemented to limit the growth of fugitive dust generated during project-related construction activities.<br><br>As indicated in the comment, an Air Impact Assessment (AIA) application is required for future development project(s) that are subject to District Rule 9510. Said application will be submitted as required by Rule 9510.<br><br>As noted in the IS/MND, any future development projects in the annexation area requiring discretionary actions under CEQA will be required to prepare site-specific analyses to determine any potential impacts. Future development projects would be required to comply with all applicable permits and regulatory standards, including those established by the District.<br><br>This comment does not raise an issue relative to the adequacy or completeness of the analysis provided in the IS/MND, does not raise environmental issues, and does not require the incorporation of additional information into the IS/MND. No further response is necessary. |
| B1-5 | **District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants):** The Project will be subject to District Rule 4002 since the Project will include demolition and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.<br><br>Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/. | This comment provides information related to the District's Rule 4002. As noted in the comment, future development projects under the proposed project would be subject to District Rule 4002. Both the 108-unit residential component and any future development on the annexation area would be required to comply with all applicable permits and regulatory standards, including those established by the District.<br><br>As stated in the IS/MND (page 1-14), "…The proposed project would not require the demolition of any structures as the site currently consists solely of orchards and barren land." As no structures are present on site, and because demolition or renovation would occur, |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| | | District Ruile 4002 is not applicable to the project. No further response is necessary. |
| B1-6 | **District Rule 4601 District Rule 4601 (Architectural Coatings):** The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf | Generally, in the context of air quality and atmospheric chemistry, reactive organic gases (ROGs) are largely considered analogous to, and often used interchangeably with, volatile organic compounds (VOCs). The proposed project would include the development of 108 residential lots, a 0.5-acre park, and associated roadway and utility improvements. The proposed project would also construct a 0.86-acre ponding basin.<br><br>Compliance with District Rules and Regulations is a standard requirement for development. As stated in Tables 3.3.B and 3.3.C. the emissions of ROGs do not exceed established District thresholds during either construction or operation of the proposed project.<br><br>As the proposed project would comply with applicable provisions of District Rule 4601, and the proposed project would not generate emissions of ROGs (VOCs) in excess of established District significance standards, no additional information or evaluation of this issue in the IS/MND is required. No further response is necessary. |
| B1-7 | **District Regulation VIII (Fugitive PM10 Prohibitions):** The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII, specifically Rule 8021 – Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.<br><br>Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For | Compliance with District Rules and Regulations is a standard requirement for development. Furthermore, consistent with District Regulation V11, Regulatory Compliance Measure (RCM) 1 identifies measures and practices that will be implemented to limit the growth of fugitive dust generated during project-related construction activities.<br><br>As indicated in the comment, an Air Impact Assessment (AIA) application is required for future development project(s) that are subject to District Rule 9510. Said application will be submitted as required by Rule 9510.<br><br>As stated in Tables 3.3.B and 3.3.C, the emission of fugitive dust during construction or operation of the proposed project would not exceed established District significance thresholds. As required by District Rule 8201, a Dust Control Plan will be submitted to the District. This is a standard requirement for all development and |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| | additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950.<br><br>The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx<br><br>Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol. | should not be considered a mitigation measure. This comment does not raise an issue relative to the adequacy or completeness of the analysis provided in the IS/MND, does not raise environmental issues, and does not require the incorporation of additional information into the IS/MND. No further response is necessary. |
| B1-8 | **District Rule 4901 - Wood Burning Fireplaces and Heaters:** The purpose of this rule is to limit emissions of carbon monoxide and particulate matter from wood burning fireplaces, wood burning heaters, and outdoor wood burning devices. This rule establishes limitations on the installation of new wood burning fireplaces and wood burning heaters. Specifically, at elevations below 3,000 feet in areas with natural gas service, no person shall install a wood burning fireplace, low mass fireplace, masonry heater, or wood burning heater.<br><br>Information about District Rule 4901 can be found online at: https://ww2.valleyair.org/compliance/residential-wood-smoke-reduction-program/Co | As stated in the IS/MND (page 2-14), with District Rule 4901, the proposed project would not include any wood burning (or natural gas) fireplaces. As such, additional analysis or the provision of new information in the IS/MND is not required. No further response is necessary. |
| B1-9 | **Other District Rules and Regulations:** The Project may also be subject to the following District rules: Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). | The project includes the installation of hardscape surfaces and associated roadway improvements. East Cypress Avenue would be extended along the northern boundary of the project site, approximately 1,200 feet to the east from South Buttonwillow Avenue. The roadway extension would be 50 feet wide and contain traffic lanes in both directions. In addition, South Buttonwillow Avenue would be expanded to include pedestrian sidewalks and a bike lane on the east side of the roadway.<br><br>As all development is subject to District Rules and Regulations, as appropriate and required, the extension and/or improvement of roadways would comply with applicable District requirements related to use or application of asphalt materials. Additional analysis or the provision of new information in the IS/MND is not required. No further response is necessary. |
| B1-10 | **District Comment Letter:** The District recommends that a copy of the District's comments be provided to the Project proponent. | As appropriate, the project applicant will be provided with a copy of this comment letter. As this comment does not raise issues related to the analysis contained in the IS/MND, no further response is necessary. |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| **Organizations and Interested Parties** | | |
| **C1** | **Pacific Gas and Electric (PG&E)** | |
| C1-1 | Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.<br><br>Below is additional information for your review:<br><br>1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.<br><br>2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.<br><br>3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.<br><br>4. Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.<br><br>This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required. | This comment letter identifies the process and requirements for the provision of gas and/or electrical service and coordination of any proposed use or operation within a Pacific Gas and Electric Company (PG&E) fee strip and/or easement for either gas or electrical facilities.<br><br>This comment does not identify any specific impact to PG&E facilities that would result from the construction and/or operation of the proposed project; rather, this comment provides only general information regarding appropriate precautions for the protection of PG&E facilities and does not raise any issues relative to the adequacy or completeness of the analysis contained in the IS/MND, does not provide new information not provided in the IS/MND, and does not require the incorporation of new information into the IS/MND. As such, no further response is warranted. |

## Table B: Comments and Responses Matrix

| Letter/ Comment Number | Comment | Response |
|---|---|---|
| **C2** | **Pacific Gas and Electric** | |
| C2-1 | Thank you for providing PG&E the opportunity to review your Notice of Intent to Adopt a Finding of a Mitigated Negative Declaration dated 10/30/2025 and received on 10/30/2025. Our review indicates the notice does not appear to directly interfere with any of PG&E's existing facilities or land rights. | This comment states that the proposed project does not appear to interfere with any PG&E facilities or land rights. In the absence of any such interference, no impact would occur. This comment does not raise any issues relative to the adequacy or completeness of the analysis contained in the IS/MND, does not provide new information not provided in the IS/MND, and does not require the incorporation of new information into the IS/MND. As such, no further response is warranted. |
| C2-2 | Please note, this is our preliminary review and PG&E may provide additional comments in the future as the project progresses or if additional information is provided. If there are subsequent modifications made to the design, we ask that the plans be resubmitted for review to the email address listed below.<br><br>If PG&E gas and/or electric service are needed, please submit an application through PG&E's Your Project Portal: Sign In (yourprojects-pge.com).<br><br>As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of two (2) working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site. | This comment provides general suggested actions for continued coordination with PG&E. This comment does not raise any issues relative to the adequacy or completeness of the analysis contained in the IS/MND, does not provide new information not provided in the IS/MND, and does not require the incorporation of new information into the IS/MND. As such, no further response is warranted. |

# ATTACHMENT A

# COMMENT LETTERS

Department of Toxic Substances Control

***Yana Garcia***
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

***Gavin Newsom***
Governor

**SENT VIA ELECTRONIC MAIL**

November 5, 2025

Laura Friesen
Assistant Planner
City of Reedley
1733 Ninth Street
Reedley, CA 93654
Laura.Friesen@reedley.ca.gov

RE: MITIGATED NEGATIVE DECLARATION FOR ENVIRONMENTAL ASSESSMENT NO. 2024-08 BLOSSOM ESTATES ANNEXATION APPLICATION NO. 2024-01 GPA 2024-01 REZONE 2024-01 CUP 2024-01 VTSM 6331 DATED OCTOBER 31, 2025, STATE CLEARINGHOUSE NUMBER 2025101550

Dear Laura Friesen,

The Department of Toxic Substances Control (DTSC) reviewed the Mitigated Negative Declaration (MND) for Environmental Assessment (EA) No. 2024-08 Blossom Estates Annexation Application No. 2024-01 GPA 2024-01 Rezone 2024-01 CUP 2024-01 VTSM 6331 (Project). The proposed Project would result in the annexation of APNs 363-070-46 and 363-070-48 from the County of Fresno to the City and the development of APN 363-070-48 from agricultural use to residential use through the construction of a new private residential community, The Blossom Estates. The proposed Project would develop 108 single-family residential lots ranging in size from 4,913 square feet to 10,469 square feet, with an average lot size of 5,448 square feet. The proposed Project would also construct a 0.5-acre park within the residential community for public use on the Project site. Potential future development of APN 363-070-46 would be evaluated under separate CEQA analysis in the event that an application is submitted. Upon

annexation from the County of Fresno to the City, the proposed Project would require rezoning of the project site to Single-Family Residential (R-1-6). The R-1-6 Zoning District is intended to provide living areas at locations designated by the General Plan for low and medium density, including single-family dwellings. Additionally, the proposed Project would require a General Plan Amendment to Low-Density Residential, which would allow for 4 to 8 dwelling units per acre. DTSC recommends and requests consideration of the following comments:

1. When agricultural crops and/or land uses are proposed or rezoned for residential use, several contaminants of concern (COCs) can be present. The Lead Agency shall identify the amounts of Pesticides and Organochlorine Pesticides (OCPs) historically used on the property. If present, OCPs requiring further analysis are dichloro-diphenyl-trichloroethane, toxaphene, and dieldrin. Additionally, any level of arsenic present would require further analysis and sampling and must meet approved local area baselines or thresholds. If they do not, remedial action must take place to mitigate them below those thresholds. Additional COCs may be found in mixing/loading/storage areas, drainage ditches, farmhouses, or any other outbuildings and should be sampled and analyzed. If smudge pots had been routinely utilized, additional sampling for Polycyclic Aromatic Hydrocarbons and/or Total Petroleum Hydrocarbons may be required. These recommendations should be adhered to and become part of the environmental document. Please refer to the DTSC's Human and Ecological Risk Office (HERO) webpage for the most recent guidance and screening levels. A1-1
2. DTSC recommends all imported soil/fill material be tested to ensure all COCs meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment Guidance Manual. Furthermore, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing soil/fill is necessary. To minimize the possibility of introducing contaminated soil/fill material, there should be documentation of the origins of the soil/fill material and, if applicable, sampling be conducted to ensure that the imported soil/fill material are suitable for the intended land use. The soil sampling should A1-2

include analysis based on the source of the soil/fill and knowledge of prior land use.

3. The City of Reedley should consider soil testing as mentioned in comment #1. If, in the event any COC results are above DTSC residential screening levels, DTSC recommends the City of Reedley address the contaminations within the Project area through an Environmental Site Assessment and/or receive oversight from a self-certified local agency, DTSC or Regional Water Quality Control Board. If entering into one of DTSC's voluntary agreements, please note that DTSC uses a single standard Request for Lead Agency Oversight Application for all agreement types. Please apply for DTSC oversight using this link: Request for Agency Oversight Application. Submittal of the online application includes an agreement to pay costs incurred during agreement preparation. If you have any questions about the application portal, please contact the relevant Regional Brownfield Coordinator for your Project. A1-3

DTSC would like to thank you for the opportunity to comment on the MND for the Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via our CEQA Review email for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation
State Clearinghouse
state.clearinghouse@lci.ca.gov

Kyle Simpson
Principal / Consultant
kyle.simpson@lsa.net

Jose Lemus
Project Applicant
jose.lemus@landdesignconsulting.com

Dave Kereazis
Associate Environmental Planner
HWMP-Permitting Division – CEQA Unit
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

California
Department of Conservation
Geologic Energy Management Division

Gavin Newsom, Governor
Jennifer Lucchesi, Director

November 13, 2025

**VIA ELECTRONIC MAIL**

Laura Friesen

Laura.Friesen@reedley.ca.gov

Assessor Parcel Number(s): 36307046, 36307048
Project Location Address: South Buttonwillow Avenue and East Parlier Avenue

PROJECT TITLE: Mitigated Negative Declaration

Public Resources Code (PRC) section 3208.1 establishes re-abandonment responsibility when previously plugged and abandoned oil, gas or geothermal wells will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near previously abandoned oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received the above-referenced project dated October 31, 2025. To assist local permitting agencies, property owners, and developers in making safe and practical land use decisions regarding potential development near oil, gas, or geothermal wells, CalGEM provides a table in the attached enclosure of the wells within the parcel boundary or in its vicinity, based on CalGEM's Well Finder database (https://maps.conservation.ca.gov/doggr/wellfinder/).

CalGEM categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking at the landowner's expense if there is a need to access a well. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment (consisting of well servicing rig, pumping equipment, pipe trailer) to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure. Impermeable barriers such as asphalt, concrete, and plastic may trap hazardous gases and liquids underneath and could create a safety hazard if built over a well that later develops a leak.

A2-1

CalGEM recommends that any well for which access is impeded or built over, against CalGEM's advice, should be evaluated by a qualified petroleum professional for compliance with the statutory objectives of isolating all hydrocarbon-bearing strata; protecting underground and surface waters; prevention of subsequent damage to life, health, property, and other resources; and prevention of loss of oil, gas, or reservoir energy. CalGEM recommends that wells that do not meet these standards are abandoned or re-abandoned prior to construction. The well information can be accessed through CalGEM's Well Finder database mentioned above. PRC section 3208, subdivision (a), provides the primary statutory authority for CalGEM to oversee adequate abandonment of wells. Additionally, CalGEM has developed the regulatory guidance for operators to be followed during well abandonment, which are listed within California Code of Regulation, title 14 (CCR) section 1723 and associated sub-sections (for onshore wells), and section 1745 and associated sub-sections (for offshore wells).

There is no guarantee that a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. Due to the inability to predict all subsurface conditions or changes, it always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. CalGEM acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantee that such abandoned wells will not leak. A2-1

CalGEM advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations in Latitude and Longitude, NAD 83 decimal format, and leak testing results should be provided to CalGEM. CalGEM expects any wells found leaking to be reported to CalGEM immediately.

PRC section 3208.1 gives CalGEM the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for re-abandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be re-abandoned, or to follow the advice of the supervisor or district deputy not to undertake construction that impedes access, then the person or entity causing the construction over or near the well shall obtain all rights necessary to re-abandon the well and be responsible for the re-abandonment.

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the re-abandonment.

A2-1

Should any wells require abandonment or re-abandonment, the responsible party must submit a Notice of Intention (NOI) to CalGEM through WellSTAR. The NOI form can be accessed in the 'Plugging and Abandonment' section of the following link: https://www.conservation.ca.gov/calgem/for_operators.

No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. CalGEM also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR section1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below the surface of the ground. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from CalGEM is required before work can start.

CalGEM makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, CalGEM recommends that information regarding the below identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

2. CalGEM recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC section 3106, CalGEM has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to CalGEM's authority to order work on wells pursuant to PRC sections 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC sections 3236, 3236.5, and 3359 for violations within CalGEM's jurisdictional authority. CalGEM does not regulate grading, excavations, or other land use issues.

A2-1

Should you have any questions, or if any wells are encountered that were not part of this letter, contact CalGEM at (661) 322-4031 or via email at CalGEMCentralCSWR@conservation.ca.gov.

Sincerely,

Jeff Kimber

Jeff Kimber
Supervising Oil and Gas Engineer

Enclosure

Enclosure: The wells listed below are reported to be located within and nearby the parcel boundary and may have future access impeded.

| Township, Range, Section | API No. | Well Name |
|---|---|---|
| T15S, R23E, Sec. 23 | No wells found | |

A2-2

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

November 24, 2025

Laura Friesen
City of Reedley
Community Development Department
1733 Ninth Street
Reedley, CA 93654

**Project: Blossom Estates Environmental Assessment No. 2024-08**

**District CEQA Reference No: 20251238**

Dear Ms. Friesen:

The San Joaquin Valley Air Pollution Control District (District) has reviewed the initial study and mitigated negative declaration (IS/MND) from the City of Reedley (City) for the proposed project. Per the IS/MND, the project consists of 108 single-family residential lots and a 0.5-acre park (Project). The Project is located southeast of the intersection of South Buttonwillow Avenue and East Prather Avenue in Reedley, CA.

The District offers the following comments at this time regarding the Project:

**1a) Construction Emissions**

The District recommends, to further reduce impacts from construction-related diesel exhaust emissions, the Project should utilize the cleanest available off-road construction equipment. B1-1

**2) <u>Vegetative Barriers and Urban Greening</u>**

There are residential units located west of the Project. The District suggests the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors (e.g., residential units).

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the update of gaseous B1-2

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

www.valleyair.org www.healthyairliving.com

pollutants. Examples of vegetative barriers include, but are not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought tolerant, low-maintenance greenery.

B1-2 (cont)

## 3) District Rules and Regulations

The District issues permits for many types of air pollution sources, and regulates some activities that do not require permits. A project subject to District rules and regulations would reduce its impacts on air quality through compliance with the District's regulatory framework. In general, a regulation is a collection of individual rules, each of which deals with a specific topic. As an example, Regulation II (Permits) includes District Rule 2010 (Permits Required), Rule 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits), and several other rules pertaining to District permitting requirements and processes.

B-1-3

The list of rules below is neither exhaustive nor exclusive. Current District rules can be found online at: https://ww2.valleyair.org/rules-and-planning/current-district-rules-and-regulations. To identify other District rules or regulations that apply to future projects, or to obtain information about District permit requirements, the project proponents are strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

### 3a) District Rule 9510 - Indirect Source Review (ISR)

The Project is subject to District Rule 9510 because it will receive a project-level discretionary approval from a public agency and will equal or exceed 50 dwelling units of residential development.

The purpose of District Rule 9510 is to reduce the growth in both NOx and PM emissions associated with development and transportation projects from mobile and area sources; specifically, the emissions associated with the construction and subsequent operation of development projects. The ISR Rule requires developers to mitigate their NOx and PM emissions by incorporating clean air design elements into their projects. Should the proposed development project clean air design elements be insufficient to meet the required emission reductions, developers must pay a fee that ultimately funds incentive projects to achieve off-site emissions reductions.

B1-4

Per Section 5.0 of the ISR Rule, an Air Impact Assessment (AIA) application is required to be submitted no later than applying for project-level approval from a public agency. As of the date of this letter, the District has not received an AIA

application for this Project. Please inform the project proponent to immediately submit an AIA application to the District to comply with District Rule 9510 so that proper mitigation and clean air design under ISR can be incorporated into the Project's design. One AIA application should be submitted for the entire Project.

Information about how to comply with District Rule 9510 can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview

The AIA application form can be found online at: https://ww2.valleyair.org/permitting/indirect-source-review-rule-overview/forms-and-applications/

District staff is available to provide assistance, and can be reached by phone at (559) 230-5900 or by email at ISR@valleyair.org.

B1-4 (cont)

**3b) District Rule 4002 (National Emissions Standards for Hazardous Air Pollutants)**

The Project will be subject to District Rule 4002 since the Project will include demolition and removal of existing structures. To protect the public from uncontrolled emissions of asbestos, this rule requires a thorough inspection for asbestos to be conducted before any regulated facility is demolished or renovated. Any asbestos present must be handled in accordance with established work practice standards and disposal requirements.

Information on how to comply with District Rule 4002 can be found online at: https://ww2.valleyair.org/compliance/demolition-renovation/.

B1-5

**3c) District Rule 4601 (Architectural Coatings)**

The Project will be subject to District Rule 4601 since it is expected to utilize architectural coatings. Architectural coatings are paints, varnishes, sealers, or stains that are applied to structures, portable buildings, pavements or curbs. The purpose of this rule is to limit VOC emissions from architectural coatings. In addition, this rule specifies architectural coatings storage, cleanup and labeling requirements. Additional information on how to comply with District Rule 4601 requirements can be found online at: https://ww2.valleyair.org/media/tkgjeusd/rule-4601.pdf

B1-6

**3d) District Regulation VIII (Fugitive PM10 Prohibitions)**

The project proponent may be required to submit a Construction Notification Form or submit and receive approval of a Dust Control Plan prior to commencing any earthmoving activities as described in Regulation VIII,

B1-7

specifically Rule 8021 – *Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*

Should the project result in at least 1-acre in size, the project proponent shall provide written notification to the District at least 48 hours prior to the project proponents intent to commence any earthmoving activities pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). Also, should the project result in the disturbance of 5-acres or more, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials, the project proponent shall submit to the District a Dust Control Plan pursuant to District Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities). For additional information regarding the written notification or Dust Control Plan requirements, please contact District Compliance staff at (559) 230-5950. B1-7 (cont)

The application for both the Construction Notification and Dust Control Plan can be found online at: https://ww2.valleyair.org/media/fm3jrbsq/dcp-form.docx

Information about District Regulation VIII can be found online at: https://ww2.valleyair.org/dustcontrol

**3e) District Rule 4901 - Wood Burning Fireplaces and Heaters**

The purpose of this rule is to limit emissions of carbon monoxide and particulate matter from wood burning fireplaces, wood burning heaters, and outdoor wood burning devices. This rule establishes limitations on the installation of new wood burning fireplaces and wood burning heaters. Specifically, at elevations below 3,000 feet in areas with natural gas service, no person shall install a wood burning fireplace, low mass fireplace, masonry heater, or wood burning heater. B1-8

Information about District Rule 4901 can be found online at: https://ww2.valleyair.org/compliance/residential-wood-smoke-reduction-program/

**3f) Other District Rules and Regulations**

The Project may also be subject to the following District rules: Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). B1-9

**4) District Comment Letter**

The District recommends that a copy of the District's comments be provided to the Project proponent. B1-10

If you have any questions or require further information, please contact Jacob Torrez by e-mail at Jacob.torrez@valleyair.org or by phone at (559) 230-6558.

Sincerely,

Mark Montelongo
Director of Policy and Government Affairs

Daniel Martinez
Program Manager

Pacific Gas and Electric Company

**Plan Review Team**
Land Management
PGEPlanReview@pge.com

November 3, 2025

**Laura Friesen**
**Assistant Planner**
**1733 Ninth Street**
**Reedley, CA 93654**

Ref: Gas and Electric Transmission and Distribution

Dear Laura Friesen,

Thank you for submitting the **EA 2024-08** project plans for our review. PG&E will review the submitted plans in relationship to any existing Gas and Electric facilities within the project area. If the proposed project is adjacent/or within PG&E owned property and/or easements, we will be working with you to ensure compatible uses and activities near our facilities.

Attached you will find information and requirements as it relates to Gas facilities (Attachment 1) and Electric facilities (Attachment 2). Please review these in detail, as it is critical to ensure your safety and to protect PG&E's facilities and its existing rights.

Below is additional information for your review:

1. This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: https://www.pge.com/en/account/service-requests/building-and-renovation.html.

2. If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

3. An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

C1-1

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851filing is required.

This letter does not constitute PG&E's consent to use any portion of its easement for any purpose not previously conveyed. PG&E will provide a project specific response as required.

Sincerely,

Plan Review Team
Land Management

**Attachment 1 – Gas Facilities**

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws: https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf

1. Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

2. Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

3. Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

4. Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

5. Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch

wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [24/2 + 24 + 36/2 = 54] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

6. Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

7. Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line ‘kicker blocks’, storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

8. Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E’s ability to access its facilities.

9. Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

10. Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4’) in height at maturity may be planted within the easement area.

11. Cathodic Protection: PG&E pipelines are protected from corrosion with an “Impressed Current” cathodic protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

12. Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

13. PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E’s facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

## Attachment 2 – Electric Facilities

It is PG&E's policy to permit certain uses on a case by case basis within its electric transmission fee strip(s) and/or easement(s) provided such uses and manner in which they are exercised, will not interfere with PG&E's rights or endanger its facilities. Some examples/restrictions are as follows:

1. Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as "**RESTRICTED USE AREA – NO BUILDING."**

2. Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

3. Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

4. Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), plant only low-growing shrubs under the wire zone and only grasses within the area directly below the tower. Along the border of the transmission line right-of-way, plant only small trees no taller than 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

5. Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

6. Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

7. Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

8. Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

9. Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

10. Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

11. Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

12. Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (https://www.dir.ca.gov/Title8/sb5g2.html), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 (http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

13. PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

COMMENT LETTER C2

Pacific Gas and Electric Company
Morgan Bunone
Land Management
300 Lakeside Dr.
Oakland, CA 94612

November 7, 2025

Laura Friesen
Community Development Department – City of Reedley
1733 Ninth St
Reedley, CA 93654

Re: Notice of Intent to Adopt a Finding of a Mitigated Negative Declaration – Blossom Estates Southeast of the intersection of South Buttonwillow Avenue and East Parlier Avenue, Fresno County Assessor's Parcel Numbers (APNs) 363-070-46 and 363-07-48.

Dear Laura:

Thank you for providing PG&E the opportunity to review your Notice of Intent to Adopt a Finding of a Mitigated Negative Declaration dated 10/30/2025 and received on 10/30/2025. Our review indicates the notice does not appear to directly interfere with any of PG&E's existing facilities or land rights. C2-1

Please note, this is our preliminary review and PG&E may provide additional comments in the future as the project progresses or if additional information is provided. If there are subsequent modifications made to the design, we ask that the plans be resubmitted for review to the email address listed below.

If PG&E gas and/or electric service are needed, please submit an application through PG&E's Your Project Portal: Sign In (yourprojects-pge.com). C2-2

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of two (2) working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

If you have any questions regarding this response, please contact me at (925) 459-4787 or morgan.bunone@pge.com.

Sincerely,

*Morgan Bunone*

Morgan Bunone
Land Management