CITY of CLOVIS

Agenda • City Council Meeting

Council Chamber, 1033 Fifth Street, Clovis, CA 93612 (559) 324-2060
ClovisCa.gov

August 10, 2026 | 6:00 PM | Council Chamber

In compliance with the Americans with Disabilities Act, if you need special assistance to access the City Council Chamber to participate at this meeting, please contact the City Clerk at (559) 324-2060 (TTY – 711). Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the Council Chamber.

The Clovis City Council meetings are open to the public at the physical location listed above. Members of the public may observe and participate in City Council meetings through any of the following methods:

1. Attend In Person: Attend the meeting at the physical location listed above.

2. View the Meeting Online: View the meeting in a non-participatory capacity through the live webcast available at ClovisCA.gov/agendas or on the City's YouTube channel.

3. Participate Remotely: Members of the public may participate remotely through Webex. Click on the link below for information regarding registration, access, and participation instructions:

Click Here To Register Through Webex

In the event of a disruption that prevents the City from broadcasting the meeting or receiving remote public comment, the City will comply with applicable provisions of Gov. Code § 54953.4 and City policy governing remote participation and technological disruptions.

4. Written Comments: Members of the public may submit written comments through the online agenda portal at ClovisCA.gov/agendas. Please see the instructions below:

- Please submit written comments through the online agenda portal at ClovisCA.gov/agendas no later than 4:00 PM.
- Please submit a separate form for each agenda item.
- A copy of your written comment will be provided to the City Council and will identify the agenda item. If you wish to make a verbal comment, please see the instructions above.
- Written comments that do not identify an agenda item will be included under general public comment.
- Please Note: written comments received after 4:00 PM may not be provided to the City Council during the meeting. All written comments received before the close of the meeting will be included in the official record.

Campaign Contribution Prohibition and Mandatory Disclosure – Pursuant to Government Code Section 84308, a Councilmember shall not accept, solicit, or direct a campaign contribution of more than $500 from any party or their agent, or from any participant or their agent, while a proceeding involving a license, permit, contract, or other entitlement for use is pending before the City or for 12 months after a final decision is rendered in that proceeding. Any Councilmember who has received a campaign contribution of more than $500 within the preceding 12 months from a party or their agent, or from a participant or their agent, must disclose that fact on the record of the proceeding and shall not make, participate in making, or in any way attempt to use their official position to influence the decision.

Pursuant to Government Code Section 84308, subdivision (e), any party to a covered proceeding before the City Council is required to disclose on the record of the proceeding any campaign contribution, including aggregated contributions, of more than $500 made within the preceding 12 months by the party or their agent to any Councilmember. The disclosure shall be made as required by Government Code Section 84308, subdivision (e)(1) and California Code of Regulations, Title 2, section 18438.8. No party or their agent, and no participant or their agent, shall make a campaign contribution of more than $500 to any Councilmember during the covered proceeding or for 12 months after a final decision is made in that proceeding. The foregoing statements do not constitute legal advice, and parties and participants are urged to consult with their own legal counsel regarding the applicable requirements of the law.

Call to Order

Flag Salute - Councilmember Bessinger

Roll Call

Public Comments
This is an opportunity for the members of the public to address the City Council on any matter within the City Council's jurisdiction that is not listed on the Agenda. In order for everyone to be heard, please limit your comments to 3 minutes or less, or 10 minutes per topic. Anyone wishing to be placed on the Agenda for a specific topic should contact the City Manager's office and submit correspondence at least 10 days before the desired date of appearance.

Consent Calendar
Items considered routine in nature are to be placed upon the Consent Calendar. They will all be considered and voted upon in one vote as one item unless a Councilmember requests individual consideration. A Councilmember's vote in favor of the Consent Calendar is considered and recorded as a separate affirmative vote in favor of each action listed. Motions in favor of adoption of the Consent Calendar are deemed to include a motion to waive the reading of any ordinance or resolution on the Consent Calendar. For adoption of ordinances, only those that have received a unanimous vote upon introduction are considered Consent items.

1. Administration - Approval - Minutes from the August 3, 2026, City Council Meeting.
2. General Services – Approval – Res. 26-___, Authorizing Amendments to the City's Classification and Compensation Plans to Adopt the Senior Waste Recycling Maintenance Worker Classification with a Salary Range of $5,929 to $7,206 per month.
3. General Services – Approval – Res. 26-___, Renewing Medical Plan Options for Eligible Retirees and Restating the Eligibility Requirements for Participation in the Plan.

Public Hearings
A public hearing is an open consideration within a regular or special meeting of the City Council, for which special notice has been given and may be required. When a public hearing is continued, noticing of the adjourned item is required as per Government Code 54955.1.

4. Consider various items associated with approximately 54 acres of land located throughout the City of Clovis for the Infill Rezone Program, S C Ellis Investment Property LP, Cygnus 3 LLC, Bayrakdarian Ishkhan Trustee, John Gregory Development Co., Inc., Attia Amin Kamal, Sultan Intisab and Noreen Intisab Trustees, HRC Enterprises I LP, Central California Conference Association of the Seventh Day Adventists, Perry and Katherine Dictos Trustees, John and Debby Bettencourt, Clovis Unified School District, Robin M. Rogers Trustee, Afarin Karimkhanzand, Allegiant YB Investment LLC, Kenneth E. Crawford, David A. Ogden Trustee, and Kaleka Aaronjit Singh and Gurpreet Brar, property owners; City of Clovis, applicant. **Continued from July 6, 2026.**

   a. Consider Approval — Res. 26-___, A resolution of the City Council adopting an Environmental Assessment pursuant to Government Code Section 65759 for General Plan Amendment 2024-003 and Rezone 2024-002.

   b. Consider Approval — Res. 26-___, GPA2024-003, A resolution of the City Council approving amendments to the General Plan and associated specific/master plans to re-designate 20 parcels from various land use designations to the High Density Residential (20.1-30.0 dwelling units per acre) and Very High Density Residential (25.1-43.0 dwelling units per acre) land use designations.

   c. Consider Introduction — Ord. 26-___, R2024-002, An ordinance of the City Council approving a rezoning of 20 parcels from various zone districts to the R-3 (Multi-family High Density) and R-4 (Multi-family Very High Density) zone districts.
   Staff: McKencie Perez, City Planner
   Recommendation: Approve

City Manager Comments

Council Comments

Closed Session
A “closed door” (not public) City Council meeting, allowed by State law, for consideration of pending legal matters and certain matters related to personnel and real estate transactions.

5. Government Code Section 54957.6
   CONFERENCE WITH LABOR NEGOTIATORS
   Agency designated representatives: Andrew Haussler, Paul Armendariz, Amy Hance, Bethany Berube, and Scott Cross
   Employee Organization: Transit Employees Bargaining Unit

Reconvene into Open Session and Report from Closed Session

Adjournment

Future Meetings
Regular City Council Meetings are held at 6:00 PM in the Council Chamber. The following are future meeting dates:

Aug. 17, 2026 (Mon.)
Sep. 8, 2026 (Tue.)
Sep. 14, 2026 (Mon.)

CITY of CLOVIS

City Council Meeting • Minutes

August 3, 2026 **6:00 PM** **Council Chamber**

Call to Order
The meeting was called to order by Mayor Mouanoutoua at 6:00 PM.

Flag Salute - Councilmember Basgall

Roll Call
Present: Councilmember Ashbeck, Councilmember Basgall, Councilmember Bessinger, Mayor Pro Tem Pearce, and Mayor Mouanoutoua

Presentations/Proclamations

1. Presentation of Proclamation Honoring the 50th Anniversary of McCaffrey Homes.

Public Comments
Upon call, there was no public comment.

Consent Calendar
Upon call, there was no public comment.

Motion by Councilmember Ashbeck, seconded by Councilmember Bessinger, that the items on the Consent Calendar be approved. Motion carried by unanimous vote.

2. Minutes from the July 6, 2026, City Council Meeting.
3. Administration — Approval — Authorize the City Manager to execute a three (3) year software and support agreement with ESRI, Inc., for the City's Geographic Information System software for a total of $329,700 plus tax, payable at $109,900 each year.
4. Finance - Approval - **Res. 26-78,** A Resolution of Intention (ROI) to Annex Territory (Annexation #77) (MFRDR 2021-002 Southeast Corner Willow/Shepherd), to the Community Facilities District (CFD) 2004-1 and to Authorize the Levy of Special Taxes Therein and Setting the Public Hearing for September 8, 2026.
5. General Services - Approval - **Res. 26-79**, Approving a Side Letter Agreement with the Clovis Police Officers Association (CPOA) for Participation in the Peace Officers Research Association of California (PORAC) Retiree Medical Trust (RMT), and Authorizing the City Manager to Execute the Joiner Application between CPOA, the City, and PORAC.
6. General Services - Approval - Final Acceptance for Senior Center Water Damage Repairs for a Final Contract Cost of $166,002.00; and Authorize the Recording of the Notice of Completion.
7. Planning and Development Services – Approval – Final Acceptance and Authorization to Record the Notice of Completion for CIP 21-02 Loma Vista Village Green for a Final Contract Cost of $8,150,954.59.

8. Planning and Development Services – Approval – Final Acceptance and Authorization to Record the Notice of Completion for CIP 24-27 Peach Avenue Street Improvements for a Final Contract Cost of $949,676.37.
9. Planning and Development Services – Approval – Final Acceptance for Final Map for Tract 6268, located on the east side of Clovis Avenue, south of Riordan Avenue (Continental Estates Clovis, LLC).
10. Planning and Development Services – Approval – Final Acceptance for Final Map for Tract 5789A, located west of Peach Avenue, near Escalon Avenue (Owner: David M. Hailpern and Developer: Gary Mason).
11. Police Department — Approval — **Res. 26-80**, Amending the 2026-2027 Budget for the Police Department to reflect the grant award in the amount of $114,625.00; and authorize the Police Chief to execute the 2026-2027 Cannabis Tax Fund Grant Fund Agreement with the Department of California Highway Patrol.
12. Public Utilities - Approval - Final Acceptance for CIP 25-12, Big Dry Creek Canal Trail Improvements at Letterman Park, with a Final Contract Cost of $187,040.00.
13. Public Utilities - Approval - Recertification of the Sewer System Management Plan (SSMP) Six-Year Update.

Public Hearings

14. Consider Approval - **Res. 26-81**, SPR2026-008, A Resolution of the City Council adopting a Class 32 Categorical Exemption from further environmental review under the California Environmental Quality Act and approving a site plan review for the site layout and design of the new City of Clovis Alternate Dispatch Center and associated site improvements located at 2288 Encino Avenue. City of Clovis, Owner and Applicant.

Upon call, there was no public comment.

Motion for approval by Councilmember Ashbeck, seconded by Councilmember Basgall. Motion carried by unanimous vote.

15. Conduct a Public Hearing and Consider Approval - **Res. 26-82,** a Resolution Adopting the Urban Water Management Plan and the Water Shortage Contingency Plan.

The public hearing was called to order at 6:19 p.m. The following individuals addressed the Council regarding the item: Brian Wilson and Steven Trevino. There being no further public comment, the public hearing was closed at 6:51 p.m.

Motion by Councilmember Bessinger, seconded by Councilmember Ashbeck, to approve the amendment directing staff to revise the text to clarify that the City of Clovis reserves the right to take credit for the effluent conveyed to the regional wastewater treatment plant for future water supply purposes. The amendment is intended as a textual clarification only and shall not modify the water supply tables or other quantitative analyses requiring recirculation of the document. Staff is authorized to make any necessary conforming language edits to accurately reflect the Council's intent. Motion carried by unanimous vote.

Administrative Items

16. Consider Approval and Receive an Update – Approve a Contract with 4Creeks, Inc., for a Comprehensive Signage Code Review for the City's Electronic Freestanding/Billboard Signage Code in an amount not to exceed $48,000, and approve staff's recommendation to execute a contract.

The following members of the public addressed the Council on the above item: Steven Trevino

Motion for approval by Councilmember Ashbeck, seconded by Councilmember Basgall. Motion carried by unanimous vote.

Council Items

17. Consider Approval — Consider Support for the California Association of Joint Powers Authorities' Statewide Tort Reform Coalition Letter; and Authorize the City Manager to execute the Coalition's Logo Authorization and Release Form.

Upon call, there was no public comment.

Motion for approval by Councilmember Bessinger, seconded by Councilmember Ashbeck. Motion carried by unanimous vote.

City Manager Comments

City Manager Haussler announced several upcoming events, including the Clovis Mobile Recreation Park Tour at Century Park on Wednesday, August 5, 2026; Clovis Police Department's Movie Night in the park at Bicentennial Park, August 22, 2026; and a recap on the Miss Winkles Pet Microchips event.

Council Comments

There was no formal Council direction for staff.

Closed Session

Upon call, there was no public comment.

18. Government Code Section 54956.9(a)
    CONFERENCE WITH LEGAL COUNCIL - EXISTING LITIGATION
    Workers Compensation Case in regard to: Jason Smoak

Motion by Councilmember Ashbeck, seconded by Councilmember Bessinger to settle the case with a stipulated award in the amount of $87,942.50. Motion carried by unanimous vote.

19. Government Code Section 54956.9(a)
CONFERENCE WITH LEGAL COUNCIL - EXISTING LITIGATION
Workers Compensation Case in regard to: Thomas Roberts

Motion by Councilmember Ashbeck, seconded by Councilmember Bessinger to settle the case with a stipulated award in the amount of $106,502.50. Motion Carried by 4-0-1 vote with Councilmember Basgall abstained from the discussion and vote.

20. Government Code Section 54956.9(a)
CONFERENCE WITH LEGAL COUNCIL - EXISTING LITIGATION
Workers Compensation Case in regard to: Jennifer De La Torre

Motion by Councilmember Ashbeck, seconded by Councilmember Bessinger to settle the case with a stipulated award in the amount of $78,662.50. Motion Carried by unanimous vote.

21. Government Code Section 54957.6
CONFERENCE WITH LABOR NEGOTIATORS
Agency designated representatives: Andrew Haussler, Paul Armendariz, Amy Hance, Bethany Berube, and Scott Cross
Employee Organization: Transit Employees Bargaining Unit

No action was taken.

Reconvene into Open Session and Report from Closed Session

Adjournment
Mayor Mouanoutoua adjourned the meeting at 8:45 P.M. and the next regularly scheduled meeting is August 10, 2026.

_____ Mayor

_____ City Clerk

CITY of CLOVIS

Report to the City Council

To: City Council

From: General Services Department

Date: August 10, 2026

Staff: Linda Parry, Senior Management Analyst

Subject: General Services – Approval – Res. 26-___, Authorizing Amendments to the City's Classification and Compensation Plans to Adopt the Senior Waste Recycling Maintenance Worker Classification with a Salary Range of $5,929 to $7,206 per month.

Recommendation: Approve

Attachments: 1. Sr. Waste Recycling Maintenance Worker Class. ATT 1 Res 26-___

Recommendation:
For City Council to approve a resolution authorizing amendments to the City's Classification and Compensation Plans by adopting the Senior Waste Recycling Maintenance Worker Classification with a Salary Range of $5,929 to $7,206 per month.

Executive Summary:
The City has a need to add a Senior Waste Recycling Maintenance Worker classification. The proposed Senior Waste Recycling Maintenance Worker classification will be assigned to the Public Utilities Department and support the Solid Waste Division. Adequate funds were included in the adopted FY 2026-2027 budget for the new classification. Modification of the City's Classification and Compensation Plans require the City Council's approval.

Background:
During the FY 2026-2027 budget process, the Public Utilities Department determined the need to create a Senior Waste Recycling Maintenance Worker classification. This position was added to the Public Utilities Department FY 2026-2027 Position Allocation Plan but now requires the classification be approved by Council in order to recruit for and fill the position. In the last ten years, the Solid Waste Division has seen a rise in the number of employees and a significant increase in employee responsibility related to waste reduction and recycling due to state legislation. This growth has created a need for a dedicated Senior Waste Recycling Maintenance Worker to support the Division's solid waste, recycling, and organics diversion programs, including conducting site assessments and inspections, evaluating compliance with applicable regulations, and providing public education and outreach. This classification would also train other Solid Waste Recycling Maintenance workers.

The recommended salary range for the Senior Waste Recycling Maintenance Worker classification will be $5,929 to $7,206 per month. The Senior Waste Recycling Maintenance Worker classification will be assigned to the Clovis Public Works Employee's Affiliation (CPWEA) and the salary range for the Senior Waste Recycling Maintenance Worker classification will be the same as the Senior Maintenance Worker salary within the CPWEA salary structure. CPWEA representatives are supportive of the assignment of the classification to the CPWEA employee bargaining unit. The new classification and salary range reflect the current needs of the City.

Fiscal Impact:
The additional costs were budgeted in the FY 2026-2027 Public Utilities Department budget allocation.

Reason for Recommendation:
Creation and addition of the Senior Waste Recycling Maintenance Worker classification to the City's Classification and Compensation Plans provides a detailed classification description and allows for the recruitment of the new position.

Actions Following Approval:
Personnel staff will add the new Senior Waste Recycling Maintenance Worker classification to the City's Classification and Compensation Plans.

Conflict of Interest:
None.

RESOLUTION 26-___

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING AMENDMENTS TO THE CITY'S CLASSIFICATION AND COMPENSATION PLANS FOR THE SENIOR WASTE RECYCLING MAINENANCE WORKER CLASSIFICATION IN THE PUBLIC UTILITIES DEPARTMENT

WHEREAS, it has been determined that the City has a need for a Senior Waste Recycling Maintenance Worker classification to provide the necessary support to the Public Utilities Department; and

WHEREAS, it has been determined that the appropriate salary range for the Senior Waste Recycling Maintenance Worker classification is $5,929 to $7,206 per month; and

WHEREAS, it has been determined that it is appropriate to assign the Senior Waste Recycling Maintenance Worker classification to the Clovis Public Works Employee's Affiliation (CPWEA); and

WHEREAS, modification of the City's Classification and Compensation Plans requires authorization by City Council.

NOW, THEREFORE, BE IT RESOLVED, that the City of Clovis will modify the City's Classification and Compensation Plans to include the Senior Waste Recycling Maintenance Worker classification (Attachment A) with a monthly salary range of $5,929 to $7,206 per month.

* * * * *

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on August 10, 2026, by the following vote, to wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

Dated: August 10, 2026

_____ _____

Mayor City Clerk

ATTACHMENT 1

City of Clovis
Senior Waste Recycling Maintenance Worker
Monthly Salary: $5,929 to $7,206

Description

DEFINITION
Under supervision, perform a variety of unskilled, semi-skilled and skilled duties in solid waste collection, disposal, recycling and organic material programs and diversion, and assist in other related areas as directed; and perform related work as required.

CLASS CHARACTERISTICS
Positions in this class are usually assigned to the Solid Waste division and perform a majority of their work at the skilled level in the Waste Recycling Maintenance Worker series, performing the full range of specialized duties related to waste recycling in support of trade, technical, professional, or administrative staff. Incumbents are expected to possess a wide range of knowledge about recycling and organics diversion. Incumbents train Solid Waste Recycling Maintenance Workers. Positions in this class perform work which allows or requires a limited range of choice in the application of defined methods or procedures. Incumbents receive instructions when tasks are assigned and have some latitude in selecting work methods. Work is generally reviewed upon completion for final results. Incumbents are expected to refer to the supervisor for matters which do not fit a clear pattern. Incumbents participate in solid waste and diversion programs as directed.

Examples of Duties
Assist in the assessment of residential and commercial recycling, organics, and trash containers; perform a wide variety of unskilled, semi-skilled and skilled duties; run errands and conduct scheduling; perform oversight of solid waste and diversion programs as directed and conduct mandatory site inspections, reports, and tracking; provide education and outreach to the public, and training for commercial sites to assist with proper disposal; coordinate with operations to conduct Route Reviews as needed and assist with data analysis to assess program effectiveness; load and unload supplies, maintain yards and alleys; clean tools used on the job; lubricate equipment to keep equipment in good working condition; make regular inspections and perform preventative maintenance adjustments; review Residential, Commercial and Multifamily accounts; plan, prepare, schedule, and conduct on-site and remote assessments; assess compliance of generators with applicable standards and report observations; write reports and communicate results of assessment through written and oral communications; evaluate corrective actions necessary when completing an assessment at a site; assess residential, commercial, and multi-family accounts for space waivers; mail and deliver educational information to commercial, residential, multi-family, and edible food generators; mail and deliver educational information to edible food recovery organizations; pick up blown litter on site and adjoining roads; inspect and record daily incoming loads; deal with customers in a professional manner, responds to customers politely and courteously; ask appropriate personnel for assistance when needed; keep accurate daily records; operate City vehicles; and perform related work as required.

ATTACHMENT A

Typical Qualifications

LICENSE REQUIRED

- Possession of a valid Class A or B California Driver's License and a good driving record

EDUCATION AND EXPERIENCE

Education

- High School diploma or equivalent.

Experience

- Three (3) years of responsible general construction or maintenance work experience equivalent to that of a Maintenance Worker with the City of Clovis including at least two (2) years of full-time work experience with the City of Clovis in a position comparable to a Waste Recycling Maintenance Worker.

QUALIFICATIONS

Knowledge of:

- Basic Math;
- Computer terminal operating methods;
- Basic principles and practices of record keeping;
- Occupational hazards and standard safety procedures, including proper usage of personal protective equipment (PPE);
- Personal computer system operation;
- Basic office and clerical practices;
- Appropriate safety precautions and procedures;
- Safe driving practices;
- Pertinent Federal, State, and local laws, codes, and regulations.

Ability to:

- Operate a computer terminal accurately and efficiently
- Use software programs such as Microsoft Word, Microsoft Excel, etc.;
- Read, understand, and apply simple written materials;
- Communicate clearly and concisely, both orally and in writing;
- Maintain accurate records and logs;
- Sort and file accurately and locate materials in files;
- Perform a variety of semi-skilled duties;
- Use and properly maintain assigned tools and equipment;
- Operate standard equipment;
- Multitask and work independently in the absence of supervision;
- Operate a vehicle observing legal and defensive driving practices;

- Establish and maintain effective relationships with person contacted in the course of work.

SUPPLEMENTAL INFORMATION
PHYSICAL DEMANDS AND WORKING CONDITIONS

- Strength: Lifting, carrying, and or pushing 50 pounds with frequent lifting and/carrying of objects weighing up to 25 pounds.
- Incumbents may be required to work in outside environment and may be exposed to dusts, pollen, heat during the summer months and cold during the winter months.

CITY of CLOVIS

Report to the City Council

To: City Council

From: General Services Department

Date: August 10, 2026

Staff: Linda Parry, Senior Management Analyst

Subject: General Services – Approval – Res. 26-___, Renewing Medical Plan Options for Eligible Retirees and Restating the Eligibility Requirements for Participation in the Plan.

Recommendation: Approve

Attachments: 1. Retiree Medical Plan Renewal ATT 1 Res. 26 -___

Recommendation:
For City Council to approve a Resolution renewing the City's Retiree Medical Plan options for eligible retirees and restating eligibility requirements for participation in the plan.

Executive Summary:
For many years, the City has sponsored a group retiree medical plan for retirees who meet certain eligibility requirements. Approval of the attached Resolution renews the retiree medical plan for the 2027 plan year.

Background:
For many years, the City has offered employees who retire from City service the option of purchasing the same medical and prescription drug benefit package offered to full-time, regular employees. The retiree medical plan option is renewed annually at the discretion of the Council. This option provides qualifying retirees, those with a minimum of five (5) years of full-time City service immediately preceding retirement, with the opportunity to continue participation in the City's medical/prescription plans. Eligibility requirements for participation in the plan and rate information are listed in the attached (Attachment A of the Resolution).

Fiscal Impact:
The retiree medical plan option is rated separately from the active City employee medical plan. In addition, monthly premiums are paid entirely by the retirees. Consequently, there is no fiscal impact on the City from this program.

Reason for Recommendation:

Council action is necessary to renew the retiree medical plan option for eligible retirees for the 2027 plan year.

Actions Following Approval:
Upon approval, the program renewal will become effective with the 2027 plan year, which runs from January 1, 2027, through December 31, 2027. Eligible retirees will be provided with an open enrollment period (October 19 through November 13, 2026). Additionally, employees who retire and become eligible during the 2027 plan year will be provided with a similar notice at the time of retirement.

Conflict of Interest:
None.

RESOLUTION 26-

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING THE RENEWAL OF THE RETIREE MEDICAL PLAN OPTION FOR ELIGIBLE RETIREES AND RESTATING THE ELIGIBILITY REQUIREMENTS FOR PARTICIPATION IN THE PLAN

WHEREAS, the City offers a retiree health plan that allows retirees to purchase medical and prescription coverage; and

WHEREAS, the City has established eligibility requirements for participation in the plan listed in Attachment A; and

WHEREAS, continued offering of the retiree health plan is determined on an annual basis at the discretion of the Council.

NOW, THEREFORE, BE IT RESOLVED, that the City of Clovis hereby renews the Retiree Medical Plan Option and rates effective January 1, 2027, as summarized in Attachment A.

* * * * *

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on August 10, 2026, by the following vote, to wit:

AYES:
NOES:
ABSENT:
ABSTAIN:

Dated: August 10, 2026

_____ _____

Mayor City Clerk

ATTACHMENT 1

Retiree Medical/Prescription Plan Summary
For the 2027 Plan Year

Retiree Benefits

Effective January 1, 2027, retirees of the City of Clovis will be allowed to continue in a City sponsored Retiree Medical/Prescription Plan at their own expense, provided they meet the plan eligibility requirements. Enrolled retirees will participate in the annual open enrollment for the medical/prescription plans.

Eligibility Requirements

To be eligible for the Retiree Medical/Prescription Plan, a retired/retiring employee must meet the following eligibility requirements:

1. Been continuously covered in the medical/prescription portion of the City's health plan through December 31, 2026, as a full-time regular employee or a retired enrollee; or, was continuously covered by a City-approved group medical/prescription plan as a full-time regular City employee immediately preceding retirement from the City.

2. Be eligible to retire in accordance with CalPERS age and service requirements, including a disability retirement.

3. Have a minimum of five (5) years of service with the City of Clovis as a full-time regular employee immediately preceding employment separation with the City of Clovis.

4. Retired employees and their dependents are eligible for City coverage ***until they become eligible for Medicare***. Retired employees and/or their dependents that become eligible for Medicare are no longer eligible to remain on the City's retiree plans. They have the option of enrolling in Medicare and may seek supplemental coverage other than through the City's plan.

    a. If a retired employee becomes Medicare eligible and has a spouse who is not Medicare eligible or a dependent child under the age of 26, the spouse and child may continue City coverage even after the retired employee becomes Medicare eligible and enrolls in Medicare and a supplemental plan.

    b. A spouse who becomes Medicare eligible, or a dependent child who reaches the age of 26, will not be eligible to continue in the City's Retiree Medical/Prescription Plan.

5. An eligible employee who plans on retiring must enroll in the Retiree Medical/Prescription Plan within thirty (30) calendar days of the effective date of employment separation. If an eligible employee fails to enroll, or waives enrollment, they shall not be eligible to enroll in the plan at a future date. A dependent who enrolls or has been enrolled in an alternative insurance plan for a period of time, may be added to the retiree's plan upon loss of other coverage or during open enrollment if the retiree has maintained continuous coverage with the City under this plan.

6. Eligibility for dependents normally extends through the retiree. Dependents may only be enrolled for coverage if the retiree is concurrently enrolled (except as provided for in 4-a. above). Dependents of a retiree lose eligibility for coverage under the Retiree Medical/Prescription Plan when a non-Medicare eligible retiree elects to discontinue coverage. Upon the death of a covered retiree or the death of a covered employee who was eligible to retire, a spouse or covered child may continue coverage until the spouse is Medicare eligible and the child reaches the age of 26 respectively.

7. A retiree or eligible dependent that enrolls in the Retiree Medical/Prescription Plan shall not be allowed to re-enroll in the plan if they drop coverage in the plan or fail to make their monthly premium payment within thirty (30) days of the due date.

8. Continued enrollment in the Retiree Medical/Prescription Plan is also subject to terms and conditions set forth in the Evidence of Coverage/Disclosure Document of the medical plan in which the retiree and dependents are enrolled.

A Retiree who returns to work for the City and enrolls in an active plan because of reinstatement from retirement or who has returned as an elected official, will again be eligible for retiree coverage upon retiring subject to the normal retiree requirements.

Dental and Vision Coverage

Dental and/or Vision Coverage is not available to retirees through the City of Clovis Retiree Medical/Prescription Plan.

Pre 65 Retiree Health Plan Monthly Rates charged by Vendor for the 2027 Program Year

	Anthem HMO 15	**Kaiser HMO 15**
Retiree Only	$1,442.00	$1,257.00
Retiree & Spouse	$2,985.00	$2,605.00
Retiree & Child(ren)	$2,591.00	$2,238.00
Retiree & Family	$4,319.00	$3,711.00

	Anthem PPO 80	
Retiree Only	$1,390.00	
Retiree & Spouse	$2,916.00	
Retiree & Child(ren)	$2,503.00	
Retiree & Family	$4,162.00	

	Anthem HDHP	**Kaiser HDHP**
Retiree Only	$1,000.00	$983.00
Retiree & Spouse	$2,093.00	$2,031.00
Retiree & Child(ren)	$1,827.00	$1,746.00
Retiree & Family	$2,990.00	$2,895.00

CITY of CLOVIS

Report to the City Council

To: City Council

From: Planning and Development Services Department

Date: August 10, 2026

Staff: McKencie Perez, City Planner

Subject: Consider various items associated with approximately 54 acres of land located throughout the City of Clovis for the Infill Rezone Program, S C Ellis Investment Property LP, Cygnus 3 LLC, Bayrakdarian Ishkhan Trustee, John Gregory Development Co., Inc., Attia Amin Kamal, Sultan Intisab and Noreen Intisab Trustees, HRC Enterprises I LP, Central California Conference Association of the Seventh Day Adventists, Perry and Katherine Dictos Trustees, John and Debby Bettencourt, Clovis Unified School District, Robin M. Rogers Trustee, Afarin Karimkhanzand, Allegiant YB Investment LLC, Kenneth E. Crawford, David A. Ogden Trustee, and Kaleka Aaronjit Singh and Gurpreet Brar, property owners; City of Clovis, applicant. **Continued from July 6, 2026.**

a. Consider Approval — Res. 26-___, A resolution of the City Council adopting an Environmental Assessment pursuant to Government Code Section 65759 for General Plan Amendment 2024-003 and Rezone 2024-002.

b. Consider Approval — Res. 26-___, GPA2024-003, A resolution of the City Council approving amendments to the General Plan and associated specific/master plans to re-designate 20 parcels from various land use designations to the High Density Residential (20.1-30.0 dwelling units per acre) and Very High Density Residential (25.1-43.0 dwelling units per acre) land use designations.

c. Consider Introduction — Ord. 26-___, R2024-002, An ordinance of the City Council approving a rezoning of 20 parcels from various zone districts to the R-3 (Multi-family High Density) and R-4 (Multi-family Very High Density) zone districts.

Recommendation: Approve

Attachments:

1. Infill Rezone Program ATT 1 Res. 26-___ EA
2. Infill Rezone Program ATT 2 Res. 26-___ GPA
3. Infill Rezone Program ATT 3 Ord. 26-___ Rezone
4. Infill Rezone Program ATT 4 Judgment

5. Infill Rezone Program ATT 5 Map of Sites
6. Infill Rezone Program ATT 6 Site List
7. Infill Rezone Program ATT 7 Letter for Removal
8. Infill Rezone Program ATT 8 Airport Influence Area Maps
9. Infill Rezone Program ATT 9 ALUC Consistency Determination
10. Infill Rezone Program ATT 10 Public Comments

Recommendation:
Staff and the Planning Commission recommend that the City Council adopt resolutions approving the Environmental Assessment (EA) and general plan amendment and introduce an ordinance addressing rezoning necessary for the City of Clovis (City) Infill Rezone Program (Project).

Executive Summary:
This item was continued from the July 6, 2026, City Council meeting to allow consideration of the proposed Infill Rezone Program with the full City Council in attendance.

A judgment was entered by the Fresno County Superior Court in the *Martinez v. City of Clovis* case on March 19, 2024 (Judgment). In accordance with the terms of the Judgment (**Attachment 4**), the City is required to complete the Infill Rezone Program to rezone 20 sites throughout the City to the R-3 (Multi-family High Density) or R-4 (Multi-family Very High Density) zone districts to create capacity to accommodate 1,284 additional housing units to bring the City's Housing Element into compliance with applicable state law. The Project also includes amendments to the general plan land use designations for each of the affected sites to ensure consistency between the general plan land use designation and the zoning classification. The Infill Rezone Program is also a required program of the City's 6th cycle Housing Element that will help the City meet its current and future Regional Housing Needs Allocation (RHNA) obligations and applicable state law.

Background:
The California Department of Housing and Community Development (HCD) requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's RHNA obligations. According to State law, a housing element must address the City's fair share of the regional housing need and specific State statutory requirements and must reflect the vision and priorities of the local community. The City failed to meet its 4th Cycle Housing Element RHNA requirements for lower income households during the 2006-2014 planning period. In accordance with applicable state housing law, the unmet housing units (4,425 units) were carried over into the City's 5th Cycle Housing Element for the 2015-2023 planning period. However, the City again failed to fully satisfy the carried-over unmet housing units from the 4th Cycle with sufficient rezoning during the City's 5th Cycle Housing Element period.

As a result, a lawsuit was filed against the City in 2019 for non-compliance with Housing Element requirements.

Timeline
This section serves as a summary of the timeline of events related to the Judgment and the Infill Rezone Program.

- **October 2019:** A lawsuit was filed against the City for non-compliance with Housing Element

requirements.

- **April 2021:** A Trial Court issued an order directing the City to adopt a Housing Element and rezone adequate sites to accommodate the City's RHNA obligations (4,425 units).
- **June 2021**: The City and the petitioner of the lawsuit ("Petitioner") filed appeals.
- **April 2023**: The City's appeal was partially successful, but mostly unsuccessful regarding the RHNA overlay as a means to comply with the unmet infill rezoning required as part of the City's 5th Cycle Housing Element.
- **July/August 2023**: The California Supreme Court declined to consider the City's appeal; the Court of Appeal decision was final, and the case was referred back to the Trial Court.
- **October 2023 – February 2024**: The City and the Petitioner negotiated and agreed to a settlement of the case, which included six (6) housing programs and the rezoning of properties was significantly reduced to accommodate approximately 1,284 units instead of 4,425 units.
- **March 2024**: On March 19, 2024, a Judgment was entered by the Fresno County Superior Court in the *Martinez v. City of Clovis* case that adopted the terms of the aforementioned settlement agreement requiring the City to bring its Housing Element into compliance with state law, and included six (6) housing programs to be included in the City's 6th Cycle Housing Element, one of which is the Infill Rezone Program. The Infill Rezone Program is necessary to bring the City's Housing Element into compliance with applicable state housing law and in satisfaction of the Judgment.
- **May 2024**: The City Council initiated a general plan amendment and rezone for the Infill Rezone Program, which included redesignating and rezoning 24 sites identified within the City. The City Council also adopted a resolution authorizing the City Manager to execute a consultant services agreement between the City and Rincon Consultants, Inc. (Rincon) for the preparation of an EA and related services for purposes of satisfying the environmental review requirements provided under Government Code section 65759.
- **June/July 2024**: Staff mailed letters to the property owners of the 24 identified sites notifying them of the proposed inclusion of the parcels in the Infill Rezone Program. Several property owners reached out and expressed both opposition and support for their inclusion. Several property owners also reached out and requested that various parcels be included in the Infill Rezone Program.
- **July 2024 – March 2025**: Staff worked with the property owners to determine their inclusion in the Infill Rezone Program. The property owners of 10 sites originally identified requested that their identified parcels be removed and property owners of six (6) new parcels requested to be included. After review, 10 of the initially identified sites were removed from the Infill Rezone Program, and six (6) other sites were identified as adequate replacement parcel candidates to satisfy state housing law, the Judgment, and the City's Housing Element and RHNA obligations.
- **March 2025-April 2026**: Staff worked with Rincon to prepare the EA for the Infill Rezone Program.
- **December 2025**: Staff hosted four (4) informational meetings related to the Infill Rezone Program. The meetings were held on December 2, 4, 11, and 16, 2025 in the City Council Chambers.
- **May 2026:** Planning Commission considered the item at their regular meeting on May 28, 2026.
- **June 2026:** Staff hosted one (1) informational meeting related to the Infill Rezone Program on June 23, 2026.
- **July 2026**: Scheduled for City Council consideration at the July 6, 2026 meeting; however, the item was continued to allow consideration of the proposed Infill Rezone Program with the full

City Council in attendance.

Proposal

On May 6, 2024, the City Council initiated a general plan amendment and rezone for the Infill Rezone Program. General Plan Amendment (GPA) 2024-003 amends the land use designation of the 20 sites to High or Very High Density Residential and Rezone (R) 2024-002 rezones the 20 sites to the R-3 or R-4 zone districts.

These applications will facilitate the potential development of approximately 1,303 housing dwelling units in the City by increasing the authorized residential development densities of the sites. The estimated potential yield of at least 1,303 dwelling units is based on assumed residential densities consistent with the City's Housing Element methodology. Specifically, 17 of the 20 sites are assumed to develop at 24 dwelling units per acre (du/ac), while the remaining three (3) sites are assumed at 25.1 du/ac. The applications are also being processed as a single program affecting multiple sites. The total acreage of sites to be rezoned is approximately 54 acres. **Attachment 5** depicts the sites to be amended and rezoned throughout the City. **Attachment 6** details the site identification (ID) number, existing land use, proposed land use, existing zoning and proposed zoning designations of each site.

Site Selection

As part of the Judgment, 24 candidate sites were originally identified for the Infill Rezone Program. Sites were initially identified because they each satisfy the following criteria that is consistent with criteria used to identify potential rezone candidate sites for the Housing Element Inventory:

- Between 0.8 acres and 10 acres
- Vacant or underutilized parcels
- Within the City limits
- Not part of the City's housing inventory or other housing programs

After discussion with several of the candidate site property owners, several requested that they be removed from the Infill Rezone Program. In order to remove initial candidate sites from the Infill Rezone Program, staff needed to identify other candidate sites to comply with the Judgment and the required capacity of 1,284 housing units. Six (6) additional property owners requested to be included in the Infill Rezone Program and after review of each of the six (6) sites, it was determined that each site met the applicable criteria to be eligible for the Infill Rezone Program. In accordance with the terms of the Judgment, Petitioner's legal counsel reviewed the 20 identified candidate sites and agreed with the City staff that the identified sites met the criteria for inclusion in the Infill Rezone Program so that the City's housing element would be in compliance with State law. This modified the Infill Rezone Program sites from 24 sites to 20 sites, which will still create capacity for potentially 1,303 housing units, and satisfy the 1,284 housing units required by the Judgment.

Staff has since received a letter from the representative of one of the sites (Site 63) requesting its removal from the Infill Rezone Program (**Attachment 7**). However, staff did not support the request to remove the site because the site was added at the owner's request as one of the six (6) later identified sites and the EA process and technical analysis for all 20 sites had already commenced. Removing the site at that late stage would have required revisions to the EA and supporting technical studies, and resulted in the City having to either identify a replacement site to make up the potential lost units or proceed without the site or any replacement site and falling below the total number of units required to satisfy the Judgment.

General Plan Amendment

GPA2024-003 proposes to amend the General Plan land use designations for 20 sites in the Infill Rezone Program. The proposed land use designations will be modified from various land use designations to High and Very High Density Residential. Of the 20 sites, 17 will be redesignated to the High Density Residential land use designation. This land use designation permits 20.1 to 30 du/ac. Three (3) sites will be redesignated to the Very High Density Residential land use designation, which permits 25.1 to 43 du/ac. The specific locations of the parcels are outlined in **Attachment 5** and the site details are outlined in **Attachment 6**.

Amendments to Specific or Master Plans

Nine (9) sites within the Infill Rezone Program are also located within an adopted specific plan or master plan (**Table 1**). Approval of GPA2024-003 would amend the plans listed below to ensure consistency. If any of the plans listed below do not currently allow multi-family uses or specify densities different from those proposed in GPA2024-003, this amendment would revise those provisions for the nine (9) sites to permit multi-family development at a density of 20.1 to 30 du/ac. Development standards of the Clovis Municipal Code and the R-3 zone district shall apply.

Table 1

Site ID	Specific Plan/Master Plan	Type of Modification
63	Herndon-Shepherd Specific Plan (HSSP)	Land Use and Zoning
72	HSSP	Land Use and Zoning
115	Loma Vista Specific Plan (LVSP)	Land Use and Zoning
157	Harlan Ranch Master Plan	Land Use, Zoning, and Planning Area 30
167	Shaw Avenue Specific Plan (SASP)	Land Use, Zoning, and Planning Area 6
168	SASP	Land Use, Zoning, and Planning Area 6
197	HSSP	Land Use and Zoning
590	LVSP	Land Use and Zoning
592	HSSP	Land Use and Zoning

Airport Land Use Commission

Five (5) of the sites in the Infill Rezone Program are located within the Airport Influence Area (Traffic Pattern Zone) of the Fresno Yosemite International (FYI) Airport (**Attachment 8**). The five (5) sites are identified in **Table 2**, below. Pursuant to the City's General Plan Environmental Safety Policy 3.11, the City shall approve land uses in a manner consistent with the FYI Airport Land Use Compatibility Plan. The FYI Airport Land Use Compatibility Plan was replaced by the Fresno County Airport Land Use Compatibility Plan (ALUCP) in 2018. The Fresno County ALUCP is overseen by the

Airport Land Use Commission (ALUC), which is required to determine consistency prior to the City approving a general plan amendment. Therefore, the City requested a Finding of Consistency from the ALUC.

The ALUC reviewed the general plan amendment at their meeting on April 6, 2026, and determined it to be consistent with the adopted Fresno County ALUCP (**Attachment 9**). This determination confirms that the revised land use designations will not result in incompatible development in the vicinity of the airport, nor will they introduce safety hazards or intensify uses beyond acceptable thresholds. As such, the general plan amendment supports orderly development, while maintaining compliance with established airport land use compatibility policies.

Table 2

Site ID	Site Address	Assessor's Parcel Number
110	236 & 256 West Santa Ana Avenue	499-060-74
161	2930 Willow Avenue	430-433-16
217	885 Gettysburg Avenue	499-540-13ST
598	2560 Fowler Avenue	499-384-42
599	2612 Fowler Avenue	499-384-41

Consistency with General Plan Goals and Policies
The proposed Project would change the land use designations to High and Very High Density Residential. The change in land use designation would not conflict with goals and policies of the General Plan. The following goals and policies reflect Clovis' desire to maintain a tradition of responsible planning and well-managed growth to preserve the quality of life in existing neighborhoods and ensure the development of new neighborhoods with an equal quality of life. The project also helps to affirmatively further fair housing by expanding opportunities for affordable housing throughout existing neighborhoods to balance the reliance on only new annexation areas to provide all the higher density sites for affordable housing opportunities.

Land Use Element
Goal 3: Orderly and sustainable outward growth into three Urban Centers with neighborhoods that provide a balanced mix of land uses and development types to support a community lifestyle and small town character.

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

Goal 5: A city with housing, employment, and lifestyle opportunities for all ages and incomes of residents.

Policy 5.2: Ownership and rental. Encourage a mixture of both ownership and rental options to meet varied preferences and income affordability needs.

Goal 6: A city that grows and develops in a manner that implements its vision, sustains the integrity of its guiding principles, and requires few and infrequent amendments to the General Plan.

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

- Create a range of housing opportunities and choices.
- Create walkable neighborhoods.
- Foster distinctive, attractive communities with a strong sense of place.
- Mix land uses.
- Strengthen and direct development towards existing communities.
- Take advantage of compact building design.

Housing Element
Goal H-1: Provide an ample supply of housing to meet the existing and projected housing needs for households at all income levels.

Policy H-1.3: Variety of Housing Types. Facilitate development of a wide range of different housing types for people of all income levels to diversify the housing stock in Clovis neighborhoods and provide units for extremely low-, very low-, low-, and moderate-income and special needs households, including people with disabilities, senior citizens, and people in need of assisted, supportive, and/or transitional housing.

Policy H-1.4: Distribute Housing Opportunities. Distribute new housing, affordable and market rate, supportive housing, and special needs housing across all neighborhoods and increase the supply of affordable housing and special needs housing in highest opportunity areas and in neighborhoods that currently have fewer affordable housing units or special needs housing to affirmatively further fair housing.

Environmental Safety Element
Goal 3: An environment in which minimized noise contributes to the public's health, safety, and welfare.

Policy 3.11: Airport land use compatibility. Approve land uses in a manner that is consistent with the Fresno Yosemite International Airport Land Use Compatibility Plan.

Findings for General Plan Amendments
The findings to consider when deciding on a general plan amendment application and staff's response to each of those findings are listed below.

1. The proposed amendment is internally consistent with the goals, policies, and actions of the General Plan.

The proposed amendment is consistent with existing General Plan goals and policies, which include an emphasis on providing a mix of housing types and sizes, providing a variety of housing product

types, and encouraging a mixture of ownership and rental options to meet the needs of the community. By encouraging a balanced mix of housing options, the proposed amendment advances the General Plan's objectives for housing diversity, choice, and long-term community sustainability.

2. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

The amendment facilitates the development of higher-density housing in a manner that is consistent with the goals and policies of the General Plan, which encourages efficient land use patterns and expanded housing opportunities. The amendment assists with the implementation of the General Plan's vision, and it helps address the community's housing needs. The project will serve the public interest by providing additional housing options. Accordingly, the project is not detrimental to the public interest, health, safety, and convenience, or general welfare of the City.

3. If applicable, the parcel is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested/anticipated project.

This finding pertains to the physical suitability of a site and therefore is not applicable to the proposed Project. The Infill Rezone Program does not approve or propose any specific development project on any specific parcel.

4. There is a compelling reason for the amendment.

The proposed amendment was initiated to satisfy a requirement in the Judgment entered against the City in the Martinez v. City of Clovis case, which specifically requires the Infill Rezone Program to rezone sites to allow for residential development at a minimum density of 20 du/ac on such sites. The proposed amendment is necessary to bring the City's Housing Element into compliance with applicable state law and the related Judgment. The amendment is proposed in conjunction with the zoning modification to maintain consistency between the zoning and the General Plan land use designations.

Rezone
The proposed amendment in land use designation also requires a change in the property's assigned zone district. R2024-002 proposes rezoning 20 sites from various zone districts to the R-3 (Multi-family High Density) and R-4 (Multi-family Very High Density) zone districts. The proposed zone districts are consistent with the High and Very High Density Residential land use designations.

Findings for Rezones
The findings to consider when deciding on a rezone application and staff's response to each of those findings are listed below.

1. The proposed amendment is consistent with the goals, policies, and actions of the General Plan.

The proposed amendment is consistent with existing General Plan goals and policies, which include an emphasis on providing a mix of housing types and sizes, providing a variety of housing product types, and encouraging a mixture of ownership and rental options to meet the needs of the community. By encouraging a balanced mix of housing options, the proposed amendment advances the General Plan's objectives for housing diversity, choice, and long-term community sustainability. The proposed rezone to the R-3 and R-4 zone districts are consistent with the proposed High and Very High Density Residential land use designations.

2. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

The amendment facilitates the development of higher-density housing in a manner that is consistent with the goals and policies of the General Plan, which encourages efficient land use patterns and expanded housing opportunities. The amendment also addresses the community's housing needs. The project will serve the public interest by providing additional housing options. Accordingly, the project is not detrimental to the public interest, health, safety, and convenience, or general welfare of the City.

3. The parcel is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested zoning designations and anticipated land uses/projects.

See number 3 under the "Findings for General Plan Amendments" section above.

Environmental Assessment
Because the Project requires discretionary approval, it would ordinarily be subject to the regular environmental review requirements of the California Environmental Quality Act (CEQA). However, Government Code section 65759 provides that CEQA is not applicable to actions necessary to bring its general plan or relevant mandatory elements (i.e., the Housing Element) into compliance with any court order or judgment. Accordingly, consistent with the Court's Judgment, the environmental review for this Project is to be completed in accordance with Government Code section 65759. Section 65759 requires only a specialized initial study or specialized EA to be prepared. An EA (**Attachment 1A**) was prepared in a form similar to a draft program environmental impact report under CEQA. (Cal. Code Regs., tit. 14, § 15120, et seq.) The EA is an informational document for the public, decisionmakers, and the Court.

The EA addresses the "potentially significant impacts" concerning the environmental issue areas identified under Appendix G of the CEQA Guidelines. It also includes environmental analysis of the existing environmental setting (baseline conditions), existing regulatory setting, project impacts (i.e., direct and indirect, short-term construction and long-term operational), relevant General Plan policies, mitigation measures, and significant unavoidable impacts. A Mitigation Monitoring and Reporting Program (MMRP), **Attachment 1B**, will be incorporated into the EA. All sites within the Infill Rezone Program will be subject to the MMRP. Because the Project is being carried out pursuant to a court order (the Judgment) requiring compliance with Housing Element law, the Project is statutorily exempt from CEQA, and the City has satisfied the requirements under Government Code section 65759 for purposes of environmental review for this Project with the completion of the EA which substantially conforms with the required content of a draft environmental impact report as set forth in Article 9 of the CEQA Guidelines. (Gov. Code § 65759, subd. (c).)

Public Outreach
Informational Meetings
Prior to the Planning Commission meeting, the Planning Division hosted four (4) informational meetings in December 2025 on the Infill Rezone Program, with an estimated 150 community members in attendance. Staff opened each meeting with a brief presentation outlining the program's purpose, including state housing requirements, background on the Judgment, site identification, and the overall process and next steps. Following the presentation, attendees were invited to ask questions and share feedback. Community comments focused on housing density, traffic,

infrastructure, property values, privacy, impacts on police services, and site selection.

After the Planning Commission meeting, the Planning Division hosted one (1) informational meeting on June 23, 2026 on the Infill Rezone Program, with an estimated 50 community members in attendance. Staff opened the meeting with a brief presentation outlining the program's purpose, including state housing requirements, background on the Judgment, site identification, and the overall process and next steps. Following the presentation, attendees were invited to ask questions and share feedback. Community comments focused on housing density, traffic, infrastructure, property values, privacy, impacts on police services, and site selection.

Public Notification
For the informational meetings, the City mailed notices to property owners within 800 feet of each site that is part of the Infill Rezone Program.

The public hearing for this item was originally noticed for the July 6, 2026 City Council meeting in accordance with applicable noticing requirements. This included a published notice in *The Business Journal* on Friday, June 12, 2026, more than 20 days prior to the July 6, 2026 City Council hearing in accordance with Government Code section 65484, subdivision (b)(2). Staff mailed notices to property owners within 800 feet of each site that is part of the Infill Rezone Program as required by applicable provisions of the Clovis Municipal Code. Staff also sent notices to members of the community that requested notification. In total, the City notified over 3,000 members of the community. At the July 6, 2026 meeting, the City Council continued the public hearing to a date certain, August 10, 2026, to allow for consideration by a full City Council. Because the public hearing was continued to a date certain, no additional public notice was required or provided. Notices for the original public hearing were mailed to all property owners within 800 feet of the project site, and the public hearing notice was published in accordance with applicable legal requirements.

Public Comments
Since the notices of the informational meetings and public hearings, staff has received over 130 letters from members of the public (**Attachment 10**).

Planning Commission
The Planning Commission considered GPA2024-003 and R2024-002 at its regular meeting on May 28, 2026. Commissioners posed various questions related to the removal of sites, site alternatives, owner authorization, communications with the school district, removal of commercial land, and the concentration of sites, all of which were addressed by staff.

One (1) member of the public spoke in support of the project and 12 members of the public spoke in opposition of the project. The concerns related to the project focused on impacts from the increased density on traffic, schools, utilities, parks, crime, safety services, property values, the ability to develop, and the disproportionate allocation of units in the Harlan Ranch area. Staff provided responses to the various questions and comments.

The Planning Commission recommended approval of GPA2024-003 and R2024-003 to the City Council with a 4-1 vote, with Commissioner Hebert voting no.

Fiscal Impact:
None.

Reason for Recommendation:

The proposed GPA2024-003 and R2024-002 were initiated to satisfy one of the requirements of the Judgment and as required as part of the City's 6th Cycle Housing Element so that the City's Housing Element will be in compliance with applicable State law.

Actions Following Approval:
The second reading of the rezoning ordinance will be brought back to the City Council for consideration at the August 17, 2026, meeting or as soon thereafter as possible.

Conflict of Interest:
None.

RESOLUTION 26-__

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS ADOPTING THE ENVIRONMENTAL ASSESSMENT AND MITIGATION MONITORING AND REPORTING PROGRAM FOR THE INFILL REZONE PROGRAM

WHEREAS, the City of Clovis (City), initiated the applications for (i) General Plan Amendment (GPA) 2024-003 to amend the Land Use Element of the 2014 Clovis General Plan and related specific and/or master plans to redesignate the land uses for twenty (20) sites from various land use designations to the High Density Residential (20.1 to 30.0 dwelling units per acre (du/ac)) and Very High Density Residential (25.1 to 43 du/ac) land use designations; and (ii) Rezone (R) 2024-002 to rezone approximately 54 acres from various zone districts to R-3 (Multifamily High Density) and R-4 (Multifamily Very High Density) zone districts (Project); and

WHEREAS, the City prepared an Environmental Assessment (EA) for the Project pursuant to Government Code section 65759, which provides that the California Environmental Quality Act (CEQA) does not apply to discretionary actions necessary to bring the Housing Element into compliance with State law pursuant to a court order or judgment, and the EA is attached hereto as **Attachment A** and is incorporated by this reference herein; and

WHEREAS, Government Code section 65759 requires only a specialized initial study or specialized EA to be prepared that substantially conforms with a draft environmental impact report as set forth in Article 9 of the CEQA Guidelines; and

WHEREAS, the City worked with Rincon Consultants, Inc. and prepared the EA for the Project, dated April 2026, which contains a mitigation monitoring and reporting program (MMRP) as provided in **Attachment B** herein and is hereby incorporated by reference; and

WHEREAS, the EA and the MMRP collectively make up the EA for the Project; and

WHEREAS, the EA has been made and remains available to the public since approximately May 19, 2026, in advance of the Clovis Planning Commission hearing on this Project; and

WHEREAS, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the Project and the EA, which is on file with the City's Department of Planning and Development Services, and reviewed and considered those portions of the Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the recommendation(s) of the Clovis Planning Commission, the written materials submitted with the requests, and the verbal

and written comments, testimony, and other evidence presented during the public hearing ("Administrative Record"); and

WHEREAS, the City Council has independently reviewed and considered the EA.

NOW, THEREFORE, BE IT RESOLVED, that the City of Clovis finds and determines as follows:

1. The EA for the Project attached hereto as **Attachment A**, is adequate and has been completed in compliance with Government Code section 65759.

2. The EA was presented to the City Council and the City Council has independently reviewed and considered the information contained in the EA prior to approving the Project.

3. Based upon its review of the EA, the City Council finds that the EA is an adequate assessment of the potentially significant environmental impacts of the Project as described in the EA and represents the independent judgment of the City Council.

4. The City Council has balanced the benefits of the Project against the significant and unavoidable impacts associated with the Project and has considered all feasible mitigation measures for the Project.

5. The MMRP for the Project attached hereto as **Attachment B**, including all mitigation measures identified therein and as described in the EA, is hereby adopted.

* * * * *

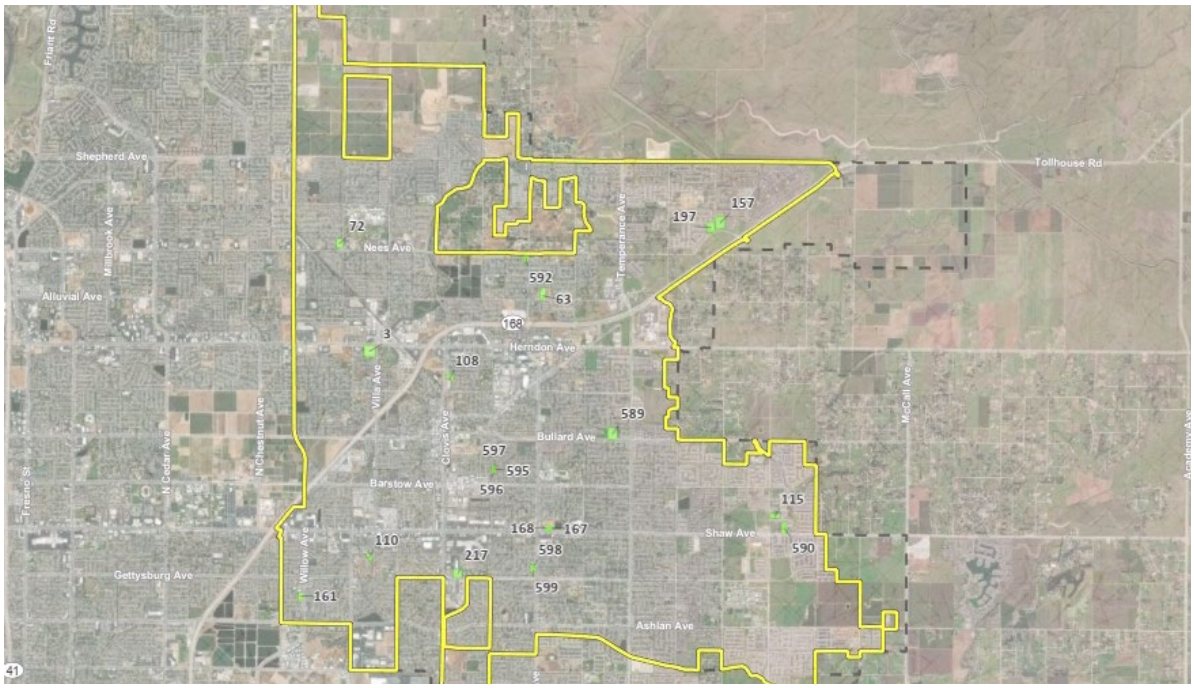
The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on August 10, 2026, by the following vote, to wit:

AYES:
NOES:
ABSENT:
ABSTAIN

DATED:

_____ Mayor

_____ City Clerk



Infill Rezone Program

Environmental Assessment

prepared by

City of Clovis
Planning and Development Services Department
1033 Fifth Street
Clovis, California 93612
Contact: McKencie Perez, MPA, Deputy City Planner

prepared with the assistance of

Rincon Consultants, Inc.
4589 North Marty Avenue, Suite 102
Fresno, California 93722

April 2026

RINCON CONSULTANTS

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Executive Summary

This document is an Environmental Assessment (EA) prepared in accordance with Government Code section 65759 analyzing the environmental effects of the rezoning of 20 Infill Rezone Program sites throughout the City of Clovis due to the court judgment entered by the Fresno County Superior Court in the Martinez v. City of Clovis case on March 19, 2024. This section summarizes the characteristics of, alternatives to, and the environmental impacts and mitigation measures associated with the Infill Rezone Program.

Project Synopsis

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Project Description

The California Department of Housing and Community Development (HCD) requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's Regional Housing Needs Allocation (RHNA). According to State law, a housing element must address the City's fair share of the regional housing need and specific State statutory requirements and must reflect the vision and priorities of the local community. The City was unable to meet its 4th and 5th Cycle Housing Element RHNA for lower income households.

The Infill Rezone Program (project) encompasses the rezoning of infill sites to the R-3 and R-4 Districts and the associated General Plan amendments required to create the capacity for 1,284 additional housing units pursuant to the Judgment as required to satisfy the City's unmet RHNA from the City's 4th cycle Housing Element that were not fully accommodated with sufficient rezoning during the City's 5th cycle Housing Element. The project, pursuant to Action Item 4 of the Judgment, will amend the land use designation of the 20 infill sites to High or Very High Density Residential and rezone the properties to the R-3 or R-4 Districts to facilitate the development of at least 1,284 additional housing dwelling units in the city. The total acreage of sites to be rezoned is approximately 54.32 acres. Of the 20 parcels, 10 parcels (17.60 acres) are vacant land.

The sites to be rezoned throughout the city may be seen in Figure 2-1 of Chapter 2, *Project Description*. Table 2-1 of Chapter 2, *Project Description* details the existing land use and zoning designations of each site, the vacancy status of the site, as well as the existing use of the property.

With the High and Very High Density Residential General Plan land use designations, the Infill Rezone Program sites could be developed at a maximum density of 30 to 43 units per acre, respectively. If developed at the maximum density, the 20 sites could accommodate a total of 1,651 housing units with the proposed zoning. In order to fulfill Action Item 4 of the Judgment, and as required by applicable housing element law, the assumed development density for the R-3 zoned sites is 24.0 units per acre and the assumed development density for the R-4 zoned sites is 25.1

units per acre. Table ES-1 shows the unit potential by site. In total, the rezoned sites would facilitate the development of 1,303 housing units, with a 19 unit surplus over the required number of 1,284 units required by the Judgment.

Table ES-1 Summary of Units by Rezoning Site

Site ID*	APN	Existing Land Use Designation	Proposed Land Use Designation	Existing Zone	Proposed Zone	Size (acres)	Maximum Density	Maximum Unit Capacity	Density Assumption (du/ac)	Assumed Units
3	49102042	GC	H	P-C-C	R-3	8.06	30	242	24	193
63	56303207	L	H	R-1-7500	R-3	3.78	30	113	24	91
72	56008207	L	H	R-1-7500	R-3	3.19	30	96	24	77
108	49123124	GC	H	C-2	R-3	1.25	30	38	24	30
110	49906074	M	H	R-1	R-3	1.25	30	38	24	30
115	55457044S	M	H	R-1	R-3	2.31	30	69	24	55
157	55803359S	MU-V	H	P-C-C	R-3	7.24	30	217	24	174
161	43043316	O	H	C-P	R-3	1.67	30	50	24	40
167	55128004	O	H	C-P	R-3	1.04	30	31	24	25
168	55128003	O	H	C-P	R-3	1.3	30	39	24	31
197	55849230	VL	H	R-1-AH	R-3	4.5	30	135	24	108
217	49954013ST	I	H	M-1	R-3	1.8	30	54	24	43
589	55026023	L	H	R-A	R-3	8.01	30	240	24	192
590	55458036s	M	H	R-1	R-3	3.02	30	91	24	72
592	56303131	L	H	R-A	R-3	2.09	30	63	24	50
595	49817202	L	VH	R-1	R-4	0.41	43	18	25.1	10
596	49817201	L	VH	R-1	R-4	0.72	43	31	25.1	18
597	49817203	L	VH	R-1	R-4	0.41	43	18	25.1	10
598	49938442	L	H	R-1	R-3	1.09	30	33	24	26
599	49938441	L	H	R-1	R-3	1.18	30	35	24	28
Total						**54.32**		**1,651**		**1,303**

Project Objectives

The project includes the following objectives:

- Ensure compliance with the Judgment entered by the court on March 19, 2024, in the Martinez v. City of Clovis case, in regard to Action Item 4: Infill Rezone Program, and as amended by both parties.
- Provide capacity to meet the State-required RHNA carryover for lower income households related to the 4th Cycle Housing Element.
- Ensure that housing development that is affordable to lower income households is achievable, through associated amendments to the Zoning Map of the Development Code.
- Disperse housing sites throughout the City to ensure that no single neighborhood or area is overburdened or impacted.
- Encourage the development of additional housing and increase the overall availability of affordable housing by ensuring that development can occur at adequate densities by amending the Land Use Element of the General Plan.

Alternatives

This EA examines alternatives to the Infill Rezone Program. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative. Studied alternatives include the following three alternatives:

- Alternative 1: No Project
- Alternative 2: Alternative Candidate Sites
- Alternative 3: Reduced Number of Rezone Sites at Higher Densities

Alternative 1 (No Project). The No Project Alternative assumes there is no change in zoning or General Plan land use designations for the 20 Infill Rezone Program sites. The future full buildout of the Infill Rezone Program sites would be controlled by the existing zoning and General Plan designations. This alternative assumes that infill residential development might still occur, where allowed, but would fall short of the required 1,284 units.

Alternative 2 (Alternative Candidate Sites). Alternative 2 assumes there exists an alternative 20 vacant and under-utilized sites across the city of Clovis that are similar or equal to the 20 Infill Rezone Program sites and satisfy applicable state housing law and RHNA requirements for rezoning to meet RHNA housing unit needs. Sites would be developed with strictly residential uses, in infill locations, similar to the proposed project. This alternative would accommodate the exact number of new dwelling units required by the judgment, or 1,284 new dwelling units and approximately 3,608 new residents. This would equate to approximately 367 less units and approximately 1,031 less new residents than the maximum proposed project. Like the maximum proposed project, this Alternative also proposes various amendments to the Zoning Ordinance, General Plan Land Use Element, and ancillary amendments to other planning documents, as necessary for clarification. This alternative would meet the project objectives only if sufficient alternative sites exist in the City of Clovis that meet the applicable housing law and RHNA requirements as the 20 proposed sites do. Thus, this alternative would require additional analysis to determine whether sufficient alternative sites exist to comply with applicable state housing law and RHNA requirements, and that would prolong the implementation of the project as currently proposed and required by the Judgment.

Alternative 3 (Reduced Number of Rezone Sites at Higher Densities). Under Alternative 3, the project would be implemented across a reduced number of sites, at higher densities, in order to meet the project objectives under the court judgment. This Alternative conceptualizes that the project proceeds with only 10 of the project sites with the largest acreages and still meets the 1,284 units required by the Judgment. This assumption is made because larger sites might have a greater chance of being developed because the value of the developed sites would be largest and larger parcels allow for more flexible development designs and greater number of units. This alternative would accommodate the exact number of new dwelling units required by the judgment, or 1,284 new dwelling units and approximately 3,608 new residents. This would equate to approximately 367 less units and approximately 1,031 less residents than the proposed project. Like the proposed project, this Alternative also proposes various amendments to the Zoning Ordinance, General Plan Land Use Element, and ancillary amendments to other planning documents, as necessary for clarification.

Refer to Chapter 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The Infill Rezone Program is being initiated as a result of a court judgment entered on March 19, 2024, in Martinez v. City of Clovis, Fresno County Superior Court Case No. 19CECG03855. In order to comply with the Judgment and ensure adequate sites are available to meet the City's RHNA goals and applicable housing element law requirement for lower income households, the rezoning of 20 infill properties is necessary to accommodate the potential housing units needed.

Issues to be Resolved

The Infill Rezone Program aims to facilitate the development of residential housing units in order to meet the requirements of the Judgment. In order to meet the objectives of the project, development of the sites will need to occur at adequate densities to provide 1,284 new residential housing units.

Issues Not Studied in Detail in the EA

As indicated in Section 4.16, *Effects Found Not to be Significant*, there is no substantial evidence that significant impacts would occur to the following issue areas: Agricultural and Forestry Resources, Geology and Soils, Mineral Resources, and Wildfire. Impacts to Aesthetics, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Noise, Population and Housing, Public Services and Recreation, Transportation, and Utilities and Service Systems are addressed in Chapter 4, *Environmental Impact Analysis* in this EA.

Summary of Impacts and Mitigation Measures

Table ES-2 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved under §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.
- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. Future development carried out under the proposed project would not affect public views of a scenic vista. Potential impacts to scenic vistas and corridors would be less-than-significant.	None	Less than significant
Impact AES-2. The project is not near a designated State Scenic Highway, so it would not damage scenic resources within a State Scenic Highway and impacts would be less than significant.	None	Less than significant
Impact AES-3. The proposed project is in an urbanized area and would be developed in conformance with applicable zoning regulations governing scenic quality. Impacts would be less than significant.	None	Less than significant
Impact AES-4. New development carried out under the proposed project would add new sources of light and glare to the City; however development would be required to comply with the City's lighting regulations to negate adverse effects on daytime or nighttime views. Impact would be less than significant.	None	Less than significant
Air Quality		
Impact AQ-1. Construction allowed by the proposed project would conflict with implementation of the 2022 Ozone Plan and 2024 $PM_{2.5}$ Plan even with implementation of the City's General Plan (GP) EIR Mitigation Measure (MM) 3-1. Impacts would be significant and unavoidable.	**GP EIR MM 3-1**: Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Clovis Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SJVAPCD adopted thresholds of significance, as identified in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the City of Clovis Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions could include, but are not limited to: ▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3, Tier 4, or more stringent emission limits, applicable for engines between 50 and 750 horsepower. A list of construction equipment by type and model year shall be maintained by the construction contractor onsite, which shall be available for City review upon request. ▪ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. ▪ Use of alternative-fueled or catalyst-equipped diesel construction equipment, if available and feasible. ▪ Clearly posted signs that require operators of trucks and construction equipment to minimize idling time (e.g., 5-minute maximum). ▪ Preparation and implementation of a fugitive dust control plan that may include the following measures: ▫ Disturbed areas (including storage piles) that are not being actively utilized for construction purposes shall be effectively stabilized using water, chemical stabilizer/suppressant, or covered with a tarp or other suitable cover (e.g., revegetated). ▫ Onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized using water or chemical stabilizer/suppressant. ▫ Land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled utilizing application of water or by presoaking. ▫ Material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained when materials are transported offsite. ▫ Operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.) ▫ Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. ▫ Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. ▫ Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. ▫ Limit traffic speeds on unpaved roads to 15 mph.	Significant and unavoidable.

Impact	Mitigation Measure (s)	Residual Impact
	▫ Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than 1 percent. ▫ Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. ▫ Adhere to Regulation VIII's 20 percent opacity limitation, as applicable. ▪ Enter into a Voluntary Emissions Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD). The VERA shall identify the amount of emissions to be reduced, in addition to the amount of funds to be paid by the project applicant to the SJVAPCD to implement emission reduction projects required for the project.	
Impact AQ-2. Construction of the proposed project would have a significant and unavoidable impact on a net increase of any criteria pollutant for which the Plan region is nonattainment even with implementation of GP EIR MM 3-1. Operation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Plan region is nonattainment under an applicable federal or State ambient air quality standard and impacts related to operation would be less than significant.	Construction: **GP EIR MM 3-1** Operation: None	Significant and unavoidable for construction impacts, less than significant for operational impacts.
Impact AQ-3. Construction allowed by the proposed project could expose sensitive receptors to substantial pollutant concentrations. Construction impacts would be significant and unavoidable even with implementation of GP EIR MMs 3-1 and 3-2. However, operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations with implementation of GP EIR MM 3-5 so operational impacts would be less than significant.	Construction: **GP EIR MM 3-1** **GP EIR MM3-2**: Prior to discretionary approval, applicants for phased development projects (i.e., construction would overlap operation/opening of the project) involving residential land uses shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD) or the City of Clovis (City) in conjunction with the SJVAPCD in preparation of a health risk assessment (HRA) for construction activities. If the construction HRA identifies risk impacts that exceed the standards as determined by the SVJAPCD at the time the project is considered, it shall identify measures to reduce these impacts to below these standards. Recommended measures may include those identified in GP EIR MM 3-1. The recommendations of the construction HRA shall be incorporated into all construction management plans which shall be submitted to the City and verified by the City's Planning Division. Operation: **GP EIR MM 3-4** Prior to discretionary project approval, the City of Clovis (City) shall evaluate new development proposals for sensitive land uses (e.g., residential, schools, day care centers) within the City for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective.[1] Applicants for sensitive land uses that are within the recommended buffer distances shall submit a health risk assessment (HRA) to the City prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), the appropriate noncancer hazard index exceeds 1.0, or the thresholds established by the SJVAPCD at the time a project is considered, the applicant shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to the following: ▪ Placement of air intakes away from high-volume roadways and/or truck loading zones. ▪ Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters. ▪ Heating, ventilation, and air conditioning systems for units that are installed with MERV filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air. Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division.	Project level emissions would remain significant and unavoidable for construction. Operational impacts would be less than significant with mitigation measures incorporated.
Impact AQ-4. The proposed project would not create objectionable odors that would affect a substantial number of people. Impacts would be less than significant.	None	Less than significant

[1] Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Accessible at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf

Impact	Mitigation Measure (s)	Residual Impact
Biological Resources		
Impact BIO-1. The proposed project would not impact special status species or their habitats.	**GP EIR MM 4-1 Biological Assessment and Focused Surveys**. The City shall require for future development or redevelopment projects that disturb vegetated, vacant land pursuant to prepare a biological resources survey. The survey shall be conducted by a qualified biologist. The biological resources survey shall include, but not be limited to: ▪ Analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed development project vicinity. ▪ Review of current land use and land ownership within the proposed development project vicinity. ▪ Assessment and mapping of vegetation communities present within the proposed development project vicinity. ▪ Evaluation of potential local and regional wildlife movement corridors. ▪ General assessment of potential jurisdictional areas, including wetlands and riparian habitats ▫ If the proposed development project site supports vegetation communities that may provide habitat for special status plant or wildlife species, a focused habitat assessment shall be conducted by a qualified biologist to determine the potential for special status plant and/or animal species to occur within or adjacent to the proposed development project area. ▫ If one or more special status species has the potential to occur within the proposed development project area, focused species surveys shall be conducted to determine the presence/absence of these species to adequately evaluate potential direct and/or indirect impacts to these species. ▫ If construction activities are not initiated immediately after focused surveys have been completed, additional preconstruction special status species surveys may be required, in accordance with the California Endangered Species Act and Federal Endangered Species Act, to assure impacts are avoided or minimized to the extent feasible. If preconstruction activities are required, a qualified biologist will perform these surveys as required for each special status species that is known to occur or has a potential to occur within or adjacent to the proposed development project area. The results of the biological survey shall be presented in a biological resources survey letter report (for proposed development projects with no significant impacts) or biological resources technical report (for proposed development projects with significant impacts that require mitigation to reduce the impacts to below a level of significance) and submitted to the City's Planning Director. **GP EIR MM 4-2 Resource Impact Avoidance/Minimization**. Project applicants shall avoid potential impacts to sensitive or protected biological resources. Avoidance may include: ▪ establishing appropriate no-disturbance buffers (consultation with relevant regulatory agencies may be required to establish suitable buffer areas) ▪ initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g. outside the avian nesting season or bat maternal or wintering roosting season). Minimizing impact by measures such as: ▫ exclusion and/or silt fencing; ▫ relocation of impacted resources; ▫ construction monitoring by a qualified biologist; ▫ training program by a qualified biologist for construction personnel on sensitive biological resources **GP EIR MM 4-3 Compensatory Mitigation**. If project-related impacts cannot be avoided or minimized to less than significant in accordance with Mitigation Measure 4-3; feasible, compensatory mitigation shall be developed by a qualified biologist and implemented to reduce impacts to sensitive or protected biological resources. Mitigation may include but is not limited to: ▪ Compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; ▪ Purchase of appropriate credits from an approved mitigation bank servicing the Clovis General Plan Update Area; ▪ Payment of in-lieu fees. **GP EIR MM 4-4 Jurisdictional Wetlands**. The City shall require applicants of development projects that have the potential to affect jurisdictional resources, to contract with a qualified biologist to conduct a jurisdictional delineation following the methods outlined in the US Army Corps of Engineers Wetland Delineation Manual to map the extent of wetlands and nonwetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in a wetland delineation letter report and shall be incorporated into the CEQA document(s) required for approval and permitting of the proposed development project. Applicants of development projects that have the potential to impact jurisdictional features shall obtain permits and authorizations from the US Army Corps of Engineers, California Department of Fish and Wildlife, and/or Central Valley Regional Water Quality Control Board. The agency authorization would include impact avoidance and minimization measures as well as mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed development project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.	Less than significant with mitigation measures.
Impact BIO-2. There would be no substantial effect on riparian habitat or other sensitive natural communities.	None	No impact
Impact BIO-3. There would be no substantial effect on wetlands.	None	No impact
Impact BIO-4. There would be no impact on wildlife movement.	None	No impact

Impact	Mitigation Measure (s)	Residual Impact
Impact BIO-5. The project would not conflict with any local policies or ordinances.	None	No impact
Impact BIO-6. The project would not conflict with any habitat conservation plans, natural community conservation plan, or other state or local conservation plan.	None	No impact
Cultural Resources		
Impact CUL-1. Development facilitated by the project could impact known and previously unidentified historical resources. Impacts to historical resources would be significant and unavoidable.	**CUL-1 Identification of Historical Resources**. A historical resources evaluation shall be prepared prior to demolition or alteration for properties listed in Table 4.4-4 to evaluate existing structures on site. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed rezone site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the South San Joaquin Valley Information Center. If the property is already a historical resource as defined by *CEQA Guidelines* Section 15064.5(a), the historical resources evaluation described above shall not be required. **CUL-2 Treatment of Historical Resources**. If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance). Mitigation may include avoidance, preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources.[2] A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits. If historical resources are identified and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, reports similar to Historic American Buildings Survey (HABS), interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.	Significant and unavoidable.
Impact CUL-2. Development facilitated by the proposed project could adversely affect identified and previously unidentified archaeological resources. However, this impact would be less than significant with mitigation.	**CUL-3 Archaeological Resources Study**. For future projects involving ground disturbance on any of the 20 Infill Rezone Program sites the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the South San Joaquin Valley Information Center, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval. If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction. **CUL-4 Unanticipated Discovery of Archaeological Resources.** In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).	Less than significant with mitigation.

[2] California Code of Regulations, Title 14, § 15126.4(b)(1). (2025). Consideration and discussion of mitigation measures proposed to minimize significant effects. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-9/section-15126-4/

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-3. There are no ground-disturbing activities associated with the project that could result in damage to or destruction of human burials. However, future development facilitated by the project would be required to adhere to State Health and Safety Code Section 7050.5 and PRC Section 5097.98. This impact would be less than significant.	None	Less than significant
Energy		
Impact E-1. Future development facilitated by the project would consume energy, but more efficiently than with current zoning due to the higher density of development, and would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.	None	Less than significant
Impact E-2. The project does not conflict with any state or local plans for renewable energy or energy efficiency. This impact would be less than significant.	None	Less than significant
Greenhouse Gas Emissions		
Impact GHG-1. The proposed project could potentially generate GHG emissions that may have a significant impact on the environment. Even with implementation of Mitigation Measure (MM) GHG-1, this impact would be significant and unavoidable.	**GHG-1 Greenhouse Gas Emissions Reductions**. Development on the 20 Infill Rezone Program sites shall be encouraged to not include natural gas appliances or natural gas plumbing; shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	Significant and unavoidable
Impact GHG-2. The proposed project conflicts with the CARB 2022 Scoping Plan. There are no local plans, policies, or regulations adopted for the purpose of reducing GHG emissions that would apply to the project. This impact would be significant and unavoidable even with implementation of MM GHG-1.	**MM GHG-1**	Significant and unavoidable
Hazards and Hazardous Materials		
Impact HAZ-1. The proposed Infill Rezone Program project would facilitate new residential development that may involve routine transportation, use, or disposal of hazardous materials in Clovis near residential land uses. Nonetheless, required compliance with applicable regulations related to hazardous materials and compliance with General Plan policies would minimize the risk of release and exposure to these materials. Impacts would be less than significant.	None	Less than significant
Impact HAZ-2. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. Impacts would be less than significant.	None	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact HAZ-3. Implementation of the proposed project would accommodate development on or near hazardous materials sites. However, compliance with applicable regulations and standard conditions of approval requiring site characterization and cleanup would minimize hazards from development on contaminated sites. Impacts would be less than significant.	None	Less than significant
Impact HAZ-4. The proposed project would not result in a safety hazard or excessive noise related to airport operation for people residing or working in the project area. Mitigation would not be required, and this impact would be less than significant.	None	Less than significant
Impact HAZ-5. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Mitigation would not be required, and the impact would be less than significant.	None	Less than significant
Impact HAZ-6. The proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.	None	Less than significant
Hydrology and Water Quality		
Impact HYD-1. Development facilitated by the project would not violate water quality standards or Waste Discharge Requirements, or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant.	None	Less than significant
Impact HYD-2. Development facilitated by the project would not interfere substantially with groundwater supplies or recharge such that the project may impede water quality control plan sustainable groundwater management of local groundwater basins. Impacts would be less than significant.	None	Less than significant
Impact HYD-3. Development under the project would not substantially alter the existing drainage pattern of future development sites, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site or substantially increase the rate or amount of surface runoff in a manner which would result in flooding or exceed the capacity of stormwater drainage systems. Impacts related to drainage patterns would be less than significant.	None	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact HYD-4. Development included under the proposed Project would not place housing and other structures within FEMA-designated Flood Hazard Areas and tsunami zones. Impacts would be less than significant.	None	Less than significant
Land Use and Planning		
Impact LU-1. The project involves implementing a rezoning program on 20 sites, mainly in developed areas of the city, and would not physically divide an established community. Therefore, this impact would be less than significant.	None	Less than significant
Impact LU-2. The project would not result in a significant environmental impact due to a conflict with any land use plan and policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, this impact would be less than significant.	None	Less than significant
Noise		
Impact NOI-1. Construction of individual projects carried out under the proposed project would temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses. Development carried out under the proposed project would also introduce new noise sources and contribute to increases in operational noise. Implementation of Mitigation Measure (MM) NOI-1 would reduce construction noise levels; however, construction noise impacts would be significant and unavoidable even with mitigation. Operational noise would need to conform to existing City requirements and therefore operational impacts would be less than significant.	**NOI-1 Measures to Reduce Construction Noise**. To minimize noise during construction, the City of Clovis shall require construction contractors to implement the following measures for construction activities conducted within the City for the 20 Infill Rezone Program sites. Construction plans submitted to the City shall include construction noise analysis and identify these measures on demolition, grading, and construction plans submitted to the City. The City of Clovis Building Division shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits. ▪ **Mufflers.** During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. ▪ **Stationary Equipment.** All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. ▪ **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers. ▪ **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations. ▪ **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities, where feasible. ▪ **Noise Disturbance Coordinator.** The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator and the City shall be posted at the construction site. ▪ **Temporary Noise Barriers.** Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) or when the anticipated construction duration is greater than is typical (e.g., two years or greater) and there are sensitive receptors within 500 feet of the construction site. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least one pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.	Significant and unavoidable for construction. Less than significant for operation and traffic noise.

Impact	Mitigation Measure (s)	Residual Impact
Impact NOI-2. Construction of individual development facilitated by the project could temporarily generate groundborne vibration, potentially affecting adjacent sensitive land uses. Impacts would be less than significant with mitigation.	**MM NOI-1** **NOI-2 Measures to Reduce Construction Vibration**. Prior to issuance of a building permit for a project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. ▪ Pile driving during construction within 135 feet of fragile structures such as historical resources ▪ Pile driving during construction within 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings) ▪ Pile driving during construction within 75 feet of engineered concrete and masonry (no plaster) ▪ Use of a vibratory roller within 40 feet of fragile historical resources or 25 feet of any other structure ▪ Use of a dozer or other large earthmoving equipment within 20 feet for a fragile historical structure or 15 feet of any other structure This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 in/sec peak particle velocity (PPV) for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If necessary, construction vibration monitoring shall be conducted to verify FTA vibration thresholds are not exceeded.	Less than significant with mitigation measures for construction. Less than significant for operations.
Impact NOI-3. Development facilitated by the project would be located outside of noise contours associated with nearby airports. Impacts would be less than significant.	None	Less than significant
Population and Housing		
Impact POP-1. Implementation of the proposed project would facilitate development of an assumed 1,303 additional housing units in the city and add an estimated 3,662 residents. Growth resulting from the project would be anticipated and would not involve unplanned population growth. This impact would be less than significant.	None	Less than significant.
Impact POP-2. Implementation of the proposed project would not result in the displacement of substantial numbers of people or housing. The proposed project would facilitate the development of new housing at higher densities. This impact would be less than significant.	None	Less than significant
Public Services and Recreation		
Impact PSR-1. Future development facilitated by the project would result in an increase of population and building capacity within Clovis. This would increase demand for fire protection services, which could result in the need for new or expanded fire protection facilities. Nonetheless, this impact would be less than significant.	None	Less than significant
Impact PSR-2. Development facilitated by the project would increase the population in the City, which would increase demand for police protection services. However, this increase would not require additional and/or expanded police protection facilities. Impacts would be less than significant.	None	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact PSR-3. Development accommodated by the project would result in an increase in student enrollment in Clovis but would not result in new schools beyond what is planned or result in substantial adverse physical impacts. Impacts would be less than significant.	None	Less than significant
Impact PSR-4. Development under the project would incrementally increase the City population and increase the use of existing public facilities, such as libraries. Impacts related to the provision of new or physically altered public facilities would be less than significant.	None	Less than significant
Impact PSR-5. Development under the project would incrementally increase the City's population, increase the use of existing parks and recreational facilities, and reduce the City's parkland to population ratio. However, impacts related to the physical deterioration of parkland or recreational facilities, and the need to construct new facilities would be less than significant.	None	Less than significant
Transportation		
Impact T-1. The project would not conflict with adopted plans or policies addressing the circulation system, including roadway, transit, bicycle, and pedestrian facilities. Impacts would be less than significant.	None	Less than significant
Impact T-2. Implementation of the project would contribute to VMT per capita increasing above the regional impact threshold. With mitigation, impacts would remain significant and unavoidable.	**T-2a Street Network**. For individual development projects within the Infill Rezone Program that will include an internal street network, provide a well-connected street network, particularly for non-motorized connections. Characteristics of street network connectivity include short block lengths, numerous three and four-way intersections, and minimal dead-ends (cul-de-sacs). Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in VMT. The CAPCOA Handbook[3] Measure T-17 uses increased vehicle intersection density as a proxy for street connectivity improvements. The CAPCOA Handbook estimates that VMT can be reduced up to 30 percent if a development provides a street grid that has much greater density (up to about three times) of streets and street intersections than the average American street grid density of 36 street intersections per square mile. **T-2b Bicycle Network**. For individual development projects within the Infill Rezone Program, contribute to increasing the length of the area bicycle network, including separated trails available to bicycles as well as on-street bike lanes. The CAPCOA Handbook Measure T-20 estimates that a 20 percent increase in bike network mileage could reduce citywide VMT by 0.01 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so this increase in bike network would reduce daily VMT by approximately 430. Note that these VMT reductions would occur citywide and would not exclusively affect project trips. **T-2c Transit Service**. For individual development projects within the Infill Rezone Program, contribute to implementation of expanded transit service in Clovis, including potentially extending service to the project areas. Implementation of expanded transit service would require both capital expenditures for support facilities, including construction of transit stops and facilitating extensions of future transit routes. The CAPCOA Handbook Measure T-25 estimates that a 25 percent increase in transit service hours could reduce citywide VMT by 0.3 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so the expanded transit network would reduce daily VMT by approximately 12,850. Note that these VMT reductions would occur citywide and would not exclusively affect project trips.	Significant and unavoidable
Impact T-3. Development associated with the project would not increase hazards due to geometric design and incompatible uses. Through compliance with applicable regulations, impacts would be less than significant.	None	Less than significant

[3] California Air Pollution Control Officers Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, December, 2021. Accessible at: https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf

Impact	Mitigation Measure (s)	Residual Impact
Impact T-4. Development associated with the project would not result in inadequate emergency access. Through compliance with City development standards, impacts would be less than significant.	None	Less than significant
Tribal Cultural Resources		
Impact TCR-1. No known TCRs have been identified within the Infill Rezone Program sites. However, the project may cause a substantial adverse change in the significance of a previously unknown or unidentified TCR due to ground disturbance during project construction activities. Impacts would be less than significant with mitigation incorporated.	**TCR-1 Inadvertent Discoveries During Construction**. In the event that cultural resources of Native American origin are identified during grading or construction, all earth disturbing work within a 50-foot radius of the find shall be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the find; an appropriate Native American representative, based on the nature of the find, is consulted; and mitigation measures are put in place for the disposition and protection of any find pursuant to Public Resources Code Section 21083.2. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource (TCR) and thus significant under the California Environmental Quality Act, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s) prior to continuation of any earth disturbing work within the vicinity of the find. The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for TCRs include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery through capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measures.	Less than significant with mitigation incorporated
Utilities		
Impact UTIL-1. Development facilitated by the Project may require the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities in Clovis. While new connections to existing utility service systems would be required, such connections would not result in disturbance beyond individual development sites and adjacent infrastructure corridors. Impacts would be less than significant.	None	Less than significant
Impact UTIL-2. Development facilitated by the Infill Rezone Program would place increased demand on water supply in normal and drought years. While projections considered in the UWMP are slightly less than those afforded by implementation of the Infill Rezone Program, sufficient water supply exists to serve the population due to conservation efforts during multiple dry years. Impacts would be less than significant.	None	Less than significant
Impact UTIL-3. Development facilitated the Infill Rezone Program would not require the relocation or construction of new or expanded wastewater treatment facilities in Clovis. Impacts would be less than significant.	None	Less than significant
Impact UTIL-4. Development facilitated by the Infill Rezone Program would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. The project would not impair the attainment of solid waste reduction goals and would comply with federal, State, and local statutes and regulations related to solid waste. Impacts would be less than significant.	None	Less than significant

1 Introduction

This section discusses (1) the project and Environmental Assessment (EA) background; (2) the legal basis for preparing an EA; (3) the scope and content of the EA; (4) issue areas found not to be significant; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under Government Code (GC) § 65759 in lieu of the California Environmental Quality Act (CEQA). The EA has been prepared in the form of a Draft Environmental Impact Report (EIR) for familiarity purposes and to assist the reader. The EA provides public agency decision-makers and the public with an analysis of the Project's potentially significant environmental effects and identifies feasible alternatives and mitigation measures that would avoid or substantially lessen any significant effects. The proposed project is described in detail in Chapter 2, *Project Description*.

1.1 Environmental Assessment Purpose

The proposed project requires discretionary approval by the City of Clovis City Council. Therefore, the proposed project would ordinarily be subject to the regular environmental review requirements of CEQA. However, due to a judgment entered by the Fresno County Superior Court in the *Martinez v. City of Clovis* case on March 19, 2024 (Judgment), environmental review is being completed under the terms of the Judgment and GC § 65759. Under GC § 65759, CEQA does not apply to discretionary actions necessary to bring the Housing Element and other relevant mandatory elements of the General Plan into compliance with State Law pursuant to a court order or judgment. The proposed project, as detailed in Chapter 2, *Project Description* is necessary to bring the City's Housing Element into compliance with State Law pursuant to the Judgment. GC § 65759 does, however, require that a specialized initial study, and when appropriate, a specialized environmental assessment, be prepared.

For guidance on preparing the Initial Study and EA, the *CEQA Guidelines* (California Code of Regulations, Title 14) are instructive. In accordance with § 15121 of the *CEQA Guidelines*, the purpose of an EA is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EA has been prepared in a form similar to that of a draft program EIR pursuant to § 15168 of the *CEQA Guidelines*. A program EIR is appropriate for a series of actions that can be characterized as one large project and are related in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. As stated in § 15146 of the *CEQA Guidelines*:

> "An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."

As noted above, this EA is to serve as an informational document for the public, City of Clovis decision makers and the Court. The process will include public hearings before the Planning Commission and City Council to consider certification of a Final EA and approval of the project.

1.2 Environmental Assessment Authority

This EA has been prepared by the City as Lead Agency, in conformance with the provisions of GC § 65759, and in substantial conformance with the criteria, standards, and procedures of CEQA (Public Resources Code, § 21000 et seq.), and the State CEQA *Guidelines* (California Code of Regulations Title 14 § 15000 et seq.), as applicable to the preparation of an EA under GC § 65759.

Lead Agency and Contact

CEQA *Guidelines* § 15367 defines a Lead Agency as "the public agency which has the principal responsibility for carrying out or approving a project." As Lead Agency, the City conducted a preliminary review of the proposed project and determined that an EA in the form of a Draft EIR was appropriate. This EA's analysis and findings reflect the City's independent and impartial conclusions.

Contact information for the City, is as follows:
McKencie Perez, MPA, Deputy City Planner
City of Clovis
Planning and Development Services Department
1033 Fifth Street
Clovis, California 93612

Responsible and Trustee Agencies

Although CEQA does not apply to the proposed actions, certain Responsible and Trustee Agencies will either approve the proposed project or have jurisdiction over natural resources affected by the project. CEQA Guidelines § 15381 defines a Responsible Agency as a public agency which proposes to carry out or approve a project, for which a Lead Agency is preparing or has prepared an EIR or Negative Declaration. For the purposes of CEQA, the term "Responsible Agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the project." CEQA Guidelines § 15386 defines a Trustee Agency as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

Responsible/Trustee Agencies for the proposed project include the California Department of Fish and Wildlife.

1.3 Environmental Type, Scope, and Organization

Environmental Assessment Type

The EA was prepared using pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Chapter 7, *References*.

The alternatives chapter of the EA (Chapter 6) was prepared in accordance with § 15126.6 of the *CEQA Guidelines* and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the proposed project while feasibly attaining most of the basic project objectives. In addition, the alternatives chapter identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative and two alternative development scenarios for the project.

The level of detail contained throughout this EA is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based. The *CEQA Guidelines* state:

> An EIR [in this case a specialized EA] should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

Environmental Assessment Organization and Content

This EA is organized in substantial conformance with the most recent State *CEQA Guidelines* for EIRs. The following summarizes this EA's organization and content:

- **Executive Summary** contains a summary of the proposed project and its consequences. Each significant effect is identified, along with the proposed mitigation measures to avoid or reduce that effect. Alternatives capable of reducing or avoiding the project's effects are identified. The known areas of controversy and issues to be resolved are also identified.
- **Chapter 1.0 Introduction** contains an overview of the EA's legal authority, purpose, and intended uses, as well as its scope and organization.
- **Chapter 2.0 Project Description** contains the following: proposed project history and background; a statement of the project's objectives; a general description of the project's technical and environmental characteristics; the discretionary actions required to fully adopt and implement the project; and a statement of the intended uses of the EA related to future development projects.
- **Chapter 3.0 Environmental Setting** describes the proposed project's regional and local setting including its locational context; existing physical characteristics and land use; available public infrastructure and services; and relationship to other relevant plans. The precise locations and boundaries of the project (i.e., Infill Rezone Program sites) are presented on detailed maps, in regional and local contexts.
- **Chapter 4.0 Environmental Impact Analysis** contains an evaluation of the environmental issues listed below. Each issue evaluation includes a description of the existing environmental setting, existing regulatory setting, potential project impacts, mitigation measures proposed to avoid or lessen significant effects, and significant unavoidable impacts (if any).
  - Aesthetics
  - Agriculture and Forestry
  - Air Quality
  - Biological Resources
  - Cultural Resources
  - Energy
  - Geology and Soils
  - Greenhouse Gas Emissions
  - Hazards and Hazardous Materials
  - Hydrology and Water Quality
  - Land Use
  - Mineral Resources
  - Noise
  - Population and Housing
  - Public Services and Recreation
  - Transportation and Traffic
  - Tribal Cultural Resources
  - Utilities and Service Systems
  - Wildfire

- **Chapter 5.0 Other CEQA Required Discussions** discusses the long-term implications of the proposed action, including any significant environmental effects and irreversible environmental changes which cannot be avoided if the proposed project is implemented.
- **Chapter 6.0 Alternatives** describes a range of reasonable alternatives to the proposed project, and to the project's location, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the project's significant effects and evaluates the alternatives' comparative merits. The environmentally superior alternative from among the alternatives considered is identified. Additionally, a summary and tabular comparison of the proposed project and the alternatives is also provided.
- **Chapter 7.0 References** includes a complete list of documents referenced throughout this EA.

Technical Appendices

The technical appendices used as a basis for much of the environmental analysis in this EA have been summarized in the respective sections and are printed separately as part of the EA Appendices. The technical appendices are available for review at the City of Clovis Planning and Development Services Department, 1033 Fifth Street, Clovis, California 93612.

Incorporation by Reference

Pursuant to State *CEQA Guidelines* § 15150, an EIR may incorporate by reference all or portions of another document, which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language is considered set forth in full as part of an EIR. Since this EA substantially conforms to the required content for an EIR, this EA incorporates by reference the most recent comprehensive update to the City General Plan which occurred in 2014[1] and has referenced various technical studies and reports prepared in support of the General Plan, as well as those prepared in support of this EA. Also, information from these documents was summarized in this EA. The relationship between the incorporated information and this EA has also been described. These documents are included in Chapter 7.0, *References,* and are hereby incorporated by reference. They are also available for review at the City of Clovis Planning and Development Services Department, 1033 Fifth Street, Clovis, California 93612.

1.4 Environmental Assessment Intended Use and Process

Environmental Assessment Intended Use

This EA is intended to be used by the City, as Lead Agency, in evaluating the proposed project and related amendments. Additionally, as an EA that substantially conforms to the required content for a Draft EIR, this document is intended to be used by the City when acting on subsequent applications for development on the Infill Rezone Program sites, to ensure compliance with the City of Clovis General Plan, Clovis Municipal Code, and mitigation framework; see *Subsequent Environmental Review*, below.

[1] The City of Clovis adopted the first City General Plan in 1963 and subsequent updates occurred in 1974, 1993, and 2014. As of June 2024, the City is currently in the process of updating its General Plan and has published a new General Plan Land Use Map dated October 2023.

Environmental Assessment Process

Although CEQA does not apply to the proposed actions, preparation of an "environmental assessment" that substantially conforms to the required content for a Draft EIR is required, if any of the proposed actions would have a significant effect on the environment (GC § 65759(a)). This document constitutes the required "environmental assessment."

A Mitigation Monitoring and Reporting Program (MMRP) will be incorporated into this document and become part of the General Plan. The City will consider all information included in the EA when acting on the project to redesignate sites to High or Very High Density Residential. Once adopted by the City, the EA will be incorporated into the General Plan.

Notice of Availability of the EA and any associated public hearings will be provided to interested agencies and the public as required or otherwise requested by the City Council.

Subsequent Environmental Review

As allowed by the CEQA Guidelines*,* the City will review future development under the proposed project considering this EA. *CEQA Guidelines* § 15168, allows a program EIR to serve as the basis for environmental review of subsequent projects. *CEQA Guidelines* §§ 15182 and 15183 provide additional exemptions for projects proposed in accordance with an adopted specific plan, or consistent with an adopted community plan, general plan, or zoning.

If any future projects on the identified Infill Rezone Program sites are not eligible for "by right" approval or another CEQA exemption, and have potentially significant adverse environmental effects that were not examined in this EA, an Initial Study would be prepared for that project, leading to the preparation of either a Negative Declaration, Mitigated Negative Declaration, focused EIR, or supplement to this EA. When additional environmental documentation for a future project is necessary, this EA may be incorporated by reference to address regional context, secondary effects, cumulative impacts, alternatives, and other factors applicable to the program overall. Chapter 2, *Project Description* provides additional information concerning future project approvals and procedures.

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2 Project Description

The proposed project (herein referred to as the "project") analyzed in this Environmental Assessment (EA) consists of the rezoning of 20 properties (Infill Rezone Program sites) from various zoning designations to the R-3 and R-4 zoning districts and amending the land use designations to High Density Residential and Very High Density Residential. This includes amending the Land Use Map of the 2014 City of Clovis General Plan Land Use Element and revisions to the Zoning Map in the Title 9 Development Code of the Clovis Municipal Code.

The City of Clovis is initiating the project to comply with the terms of a court judgment entered on March 19, 2024, in *Martinez v. City of Clovis*, Fresno County Superior Court Case No. 19CECG03855 (herein referred to as "Judgment") related to the City's 4th and 5th Cycle Housing Elements. This EA has been prepared pursuant to the Judgment issued by the court and in accordance with Government Code Section 65759. In order to comply with the Judgment and ensure adequate sites are available to meet the City's Regional Housing Needs Allocation (RHNA) goals and applicable housing element law requirements for lower income households, the rezoning of 20 infill properties is necessary to accommodate the potential housing units needed. The process is separate from the 6th Cycle Housing Element Rezone Program.

This chapter of the EA describes the key details of the project, the Infill Rezone Sites associated with the project, the additional housing unit potential as a result of the project, the objectives and discretionary actions needed for approval.

2.1 Judgment Requirements

The "Development Code Amendments" section discusses the minimum permitted density amendments to the Development Code for the R-3 District. The Development Code amendments were determined to be necessary to facilitate housing development at sufficient densities for the rezoning project, and have already been adopted. The Development Code amendments to the R-3 District are not analyzed as part of the project but are included to provide background information on the actions taken to facilitate affordable development to lower income households. The "Infill Rezone Program" section encompasses the rezoning of infill sites to the R-3 and R-4 Districts and the associated General Plan amendments required to create the capacity for 1,284 additional housing units (project) pursuant to the Judgment. The project itself proposes no physical development as further discussed below. "Rezone Project Studied in EA" describes the impacts of the project as analyzed in the subsequent sections if the 20 sites were to be developed at maximum density, or alternatively, developed at the capacity assumed under the requirements of the Judgment and applicable state housing law.

2.1.1 Development Code Amendments

For a housing element site to be considered adequate to accommodate housing for lower income households, development must be able to occur at a minimum of 20 units per acre, pursuant to California Government Code Section 65583.2. To facilitate the goals of the rezoning project, and to complete Action Item 1 of the Judgment, the City Council amended the Development Code to increase the minimum permitted density for the R-3 District from 15.1 units per acre to 20.1 units per acre. Ordinance 24-10 was presented to City Council on June 17, 2024, and adopted on July 1,

2024, at publicly attended hearings. The maximum allowed density in the R-3 District is 30.0 units per acre. The Clovis Development Code lists the district as appropriate for high density residential uses, including attached and detached single-family residential, multifamily apartments and condominiums. The R-3 District is consistent with the High Density Residential land use designation of the General Plan.

No Development Code text amendments were determined to be required for the R-4 District. The Clovis Municipal Code identifies the R-4 District as appropriate for high and very high density residential uses. The allowable density is 25.1 units to 43.0 units per acre, depending on the General Plan land use designation. The 43.0 unit per acre maximum density may be utilized for the Very High Density land use designation. The R-4 District is consistent with the High and Very High Density Residential, Mixed Use, and Transit Center land use designations of the General Plan.

2.1.2 Infill Rezone Program

The California Department of Housing and Community Development (HCD) requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's RHNA. According to State law, a housing element must address the City's fair share of the regional housing need and specific State statutory requirements and must reflect the vision and priorities of the local community. The City was unable to meet its 4th cycle Housing Element RHNA for lower income households. In accordance with applicable state housing law, the unmet housing units were carried over into the City's 5th cycle Housing Element. But the City failed to fully satisfy the carried-over unmet housing units from the 4th cycle with sufficient rezoning during the City's 5th cycle Housing Element period. As a result, this project is necessary to bring the City's Housing Element into compliance with applicable state housing law and the Judgment. The project is separate and independent from the rezone program as part of the City's 6th cycle 2023 – 2031 Housing Element.

The project, pursuant to Action Item 4 of the Judgment, will amend the land use designation of the 20 infill sites to High or Very High Density Residential and rezone the properties to the R-3 or R-4 Districts to facilitate the development of at least 1,284 additional affordable housing dwelling units in the city. The total acreage of sites to be rezoned is approximately 54.32 acres. Of the 20 parcels, 10 parcels (17.60 acres) are fully vacant land. Figure 2-1 shows the sites to be rezoned throughout the city. Table 2-1 details the existing land use and zoning designations of each site, the vacancy status of the site, as well as the existing use of the property.

Figure 2-1 Zone Change Sites

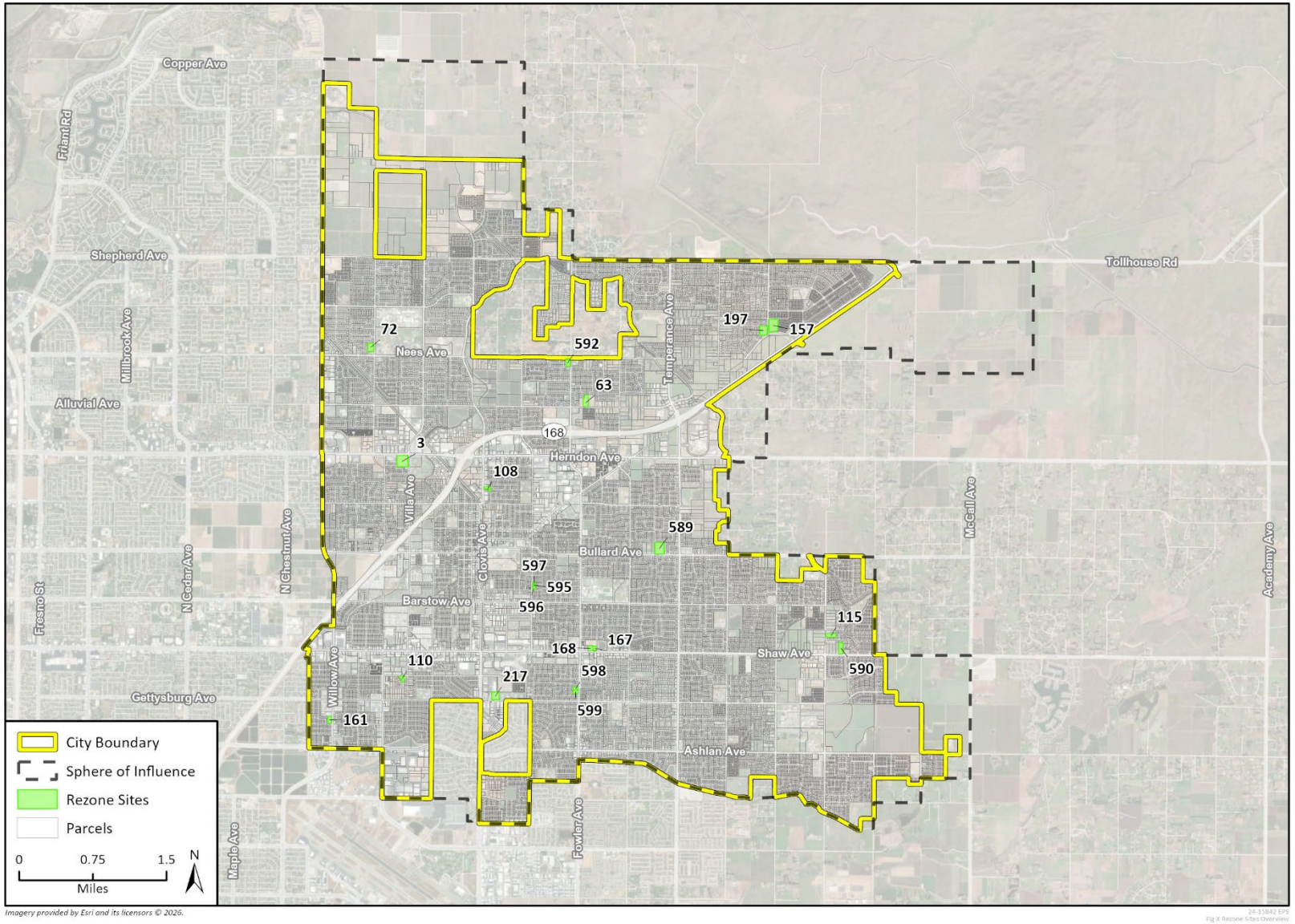


Table 2-1 Rezoning Sites

Site ID*	APN	Address	Size (acres)	Vacant?	Existing General Plan Designation	Existing Zone	Existing Use
3	49102042	270 W Herndon Ave	8.06	No	GC	P-C-C	Single-family residence; Sports facility; Tree lot
63	56303207	1933 Alluvial Ave	3.78	No	L	R-1-7500	Single family residence
72	56008207	437 W Nees Ave	3.19	No	L	R-1-7500	Single family residence
108	49123124	125 & 135 N Clovis Ave	1.25	Yes	M	C-2	Vacant
110	49906074	236 & 256 W Santa Ana Ave	1.25	Yes	M	R-1	Vacant
115	55457044S	1671 Leonard Ave	2.31	Yes	M	R-1	Vacant
157	55803359S	De Wolf & Richmond Ave	7.24	Yes	MU-V	P-C-C	Vacant
161	43043316	2930 Willow Ave	1.67	Yes	O	C-P	Vacant
167	55128004	1871 Shaw Ave	1.04	Yes	O	C-P	Vacant
168	55128003	1853 Shaw Ave	1.3	Yes	O	C-P	Vacant
197	55849230	1497 N Locan Ave	4.5	No	VL	R-1-AH	Single family residence
217	49954013ST	885 Gettysburg Ave	1.8	No	I	M-1	Clovis Academy of Gymnastics & Dance
589	55026023	2403 Bullard Ave	8.01	No	L	R-A	Former Rogers Helicopter
590	55458036s	3959 Shaw Ave	3.02	No	M	R-1	Single-family residence
592	56303131	1160 N Fowler Ave	2.09	No	L	R-A	Single family residence
595	49817202	939 & 947 Sunnyside Ave	0.41	Yes	L	R-1	Vacant
596	49817201	965 & 975 Sunnyside Ave	0.72	Yes	L	R-1	Vacant
597	49817203	925 Sunnyside	0.41	No	L	R-1	Vacant
598	49938442	2560 Fowler Ave	1.09	No	L	R-1	Single family residence
599	49938441	2612 Fowler Ave	1.18	No	L	R-1	Single family residence
Total			**54.32**				

Land Use Designations: GC = General Commercial; L = Low Density Residential; M = Medium Density Residential; MU-V = Mixed Use Village; O = Office; VL = Very Low Density Residential; I = Industrial

Zoning Districts: R-A & R-1-AH = Single Family Residential Very Low Density; R-1 & R-1-7500 = Single Family Residential Low Density Residential; C-2 = Community Commercial; P-C-C = Planned Commercial Center; C-P = Administrative and Professional Office; M-1 = Light Industrial

*The sites for the Infill Rezone Program are based upon a map and Sites Analysis delivered to Martinez's counsel on December 8, 2023, which originally identified 24 parcels with the capacity for approximately 1,284 housing units. Some parcels were agreed to be removed or replaced pursuant to the Judgment by the Facilitator and the City. The update includes 20 sites with 1,303 housing units.

2.2 Rezone Project Studied in the Environmental Assessment

The City has identified 20 sites that meet applicable state housing law requirements to be rezoned to meet the requirements of the Infill Rezone Program and ensure there is adequate capacity for at least 1,284 additional housing units appropriate for lower income households in the city to ring the City's Housing Element into compliance with applicable state housing law and the Judgment. No physical development is proposed as part of the project, but the rezoning creates the capacity for affordable multifamily housing development to occur. This EA will evaluate the impacts of the project if development were to occur at the maximum densities to adequately assess all potential impacts. The alternative to development at maximum density studied in this EA for the 20 sites is the assumed development capacity in accordance with applicable state housing law and the Judgment. If the 20 sites are developed under the proposed R-3 and R-4 Districts and High and Very High Density Residential land use designations, there is an assumed capacity or density of 1,303 housing units with a maximum capacity of 1,651 housing units.

2.3 Infill Rezone Program Sites

The 20 Infill Rezone sites are dispersed throughout the city and are largely vacant or underutilized with low density residential development. The following sections include details on the size and current use of the property, existing and proposed zoning and land use designations, and the number of housing units the site is assumed to accommodate pursuant to the Judgment. Table 2-2 details the unit potential for sites at both the maximum and assumed densities.

Rezone Site 3

The site at 270 West Herndon Avenue, currently zoned P-C-C with a General Plan land use designation of General Commercial, is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site, which is 8.06 acres, currently hosts a single-family residence, a commercial structure, and a tree lot. The new zoning is assumed to accommodate 193 units. Site 3 is shown in Figure 2-2.

Rezone Site 63

Located at 1933 Alluvial Avenue, this 3.78-acre site is currently zoned R-1-7500 with a General Plan land use designation of Low Density Residential. It is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site currently has an existing residence and is assumed to accommodate 91 units under the new zoning. Site 63 is shown in Figure 2-4.

Rezone Site 72

Currently zoned R-1-7500, the site at 437 West Nees Avenue is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 3.19-acre site, which currently hosts an existing single-family residence, is assumed to accommodate 77 units under the new zoning. Site 72 is shown in Figure 2-6.

Rezone Site 108

Located at 125 & 135 North Clovis Avenue, this 1.25-acre site is currently zoned C-2 with a General Plan land use designation of Medium Density Residential. It is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site is currently vacant and is assumed to accommodate 30 units under the new zoning. Site 108 is shown in Figure 2-8.

Rezone Site 110

The site at 236 & 256 West Santa Ana Avenue, currently zoned R-1 with a General Plan land use designation of Medium Density Residential, is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 1.25-acre site is currently vacant and is assumed to accommodate 30 units under the new zoning. Site 110 is shown in Figure 2-10.

Rezone Site 115 and Site 590

Site 115 at 1671 Leonard Avenue is currently zoned R-1 with a General Plan land use designation of Medium Density Residential and is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 2.31-acre site is currently vacant and is assumed to accommodate 55 units under the new zoning.

Site 590 is currently zoned R-1 with a General Plan land use designation of Medium Density Residential. The site at 3959 Shaw Ave is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 3.02-acre site currently hosts a single-family residence. The site is assumed to accommodate 72 units. Site 115 and Site 590 are shown in Figure 2-12.

Rezone Site 157 and Site 197

Site 157 at De Wolf and Richmond Avenue, currently zoned P-C-C with a General Plan land use designation of Mixed Use-Village, is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 7.24-acre site is currently vacant and is assumed to accommodate 174 units as a result of the project.

Site 197, currently zoned R-1-AH with a General Plan land use designation of Very Low Density Residential, at 1497 North Locan Avenue, is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 4.5-acre site currently hosts an existing rural residence and is assumed to accommodate 108 units under the new zoning.

Site 157 and Site 197 are shown in Figure 2-15.

Rezone Site 161

Located at 2930 Willow Avenue, Site 161 is a 1.67-acre site currently zoned C-P with a General Plan land use designation of Office. It is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site is currently vacant and is assumed to accommodate 40 units under the new zoning. Site 161 is shown in Figure 2-18.

Rezone Site 167 and Site 168

Site 167, at 1871 Shaw Avenue, is currently zoned C-P with a General Plan land use designation of Office, and is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 1.04-acre site is currently vacant and is assumed to accommodate 25 units under the new zoning.

Site 168 is a 1.3-acre site located at 1853 Shaw Avenue. The site is currently zoned C-P with a General Plan land use designation of Office and is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. It is currently vacant and is assumed to accommodate 31 units under the new zoning.

Site 167 and Site 168 are shown in Figure 2-20.

Rezone Site 217

Located at 885 Gettysburg Avenue, this 4.0-acre site is currently zoned M-1 with a General Plan land use designation of Industrial. Approximately 1.8 acres of the site is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site currently hosts Clovis Academy of Gymnastics & Dance and is assumed to accommodate 43 units. Site 217 is shown in Figure 2-23.

Rezone Site 589

The site at 2403 Bullard Avenue, currently zoned R-A with a General Plan land use designation of Low Density Residential, is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. This 8.01-acre site currently hosts the former Rogers Helicopter and is assumed to accommodate 192 units under the new zoning. Site 589 is shown in Figure 2-25.

Rezone Site 592

Located at 1160 North Fowler Avenue, this 2.09-acre site is currently zoned R-A with a General Plan land use designation of Low Density Residential. It is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site currently hosts an existing rural residence and is assumed to accommodate 50 units as a result of the project. Site 592 is shown in Figure 2-27.

Rezone Site 595, Site 596 and Site 597

Currently zoned R-1 with a General Plan land use designation of Low Density Residential, Site 595 at 939 & 947 Sunnyside Avenue, is proposed to be rezoned to R-4 and redesignated to Very High Density Residential. The site is currently vacant and is assumed to accommodate 10 units.

Site 596 at 965 & 975 Sunnyside Avenue, is currently zoned R-1 with a General Plan land use designation of Low Density Residential, and is proposed to be rezoned to R-4 with a new land use designation of Very High Density Residential. The site is currently vacant and is assumed to accommodate 18 units under the new zoning.

Site 597, at 925 Sunnyside, is currently zoned R-1 with a General Plan land use designation of Low Density Residential, and is proposed to be rezoned to R-4 with a new land use designation of Very High Density Residential. The site is currently vacant and is assumed to accommodate 10 units as a result of the project.

Site 595, Site 596 and Site 597 currently all belong to the same property owner and are shown in Figure 2-29. The total acreage of the parcels is 1.54 acres (0.41 acres for Site 595, 0.72 acres for Site 596 and 0.41 acres for Site 597) and assumed to accommodate a total of 38 units.

Rezone Site 598 and Site 599

Site 598 is a 1.09-acre site with an existing residence located at 2560 Fowler Avenue. The site is currently zoned R-1 with a General Plan land use designation of Low Density Residential and is proposed to be rezoned to R-3 with a new land use designation of High Density Residential. The site is assumed to accommodate 26 housing units.

Site 599, at 2612 Fowler Avenue, is currently zoned R-1 with a General Plan land use designation of Low Density Residential, and is proposed to be rezoned to R-3 and High Density Residential. This 1.18-acre site has an existing residence and is assumed to accommodate 28 units under the new zoning.

Site 598 and Site 599 are shown in Figure 2-33.

Figure 2-2 Infill Rezone Program Site 3 Site Map



Figure 2-3 Infill Rezone Program Site 3 Site Photograph



Figure 2-4 Infill Rezone Program Site 63 Site Map



Figure 2-5 Infill Rezone Program Site 63 Site Photograph



Figure 2-6 Infill Rezone Program Site 72 Site Map



Figure 2-7 Infill Rezone Program Site 72 Site Photograph



Figure 2-8 Infill Rezone Program Site 108 Site Map



Figure 2-9 Infill Rezone Program Site 108 Site Photograph



Figure 2-10 Infill Rezone Program Site 110 Site Map



Figure 2-11 Infill Rezone Program Site 110 Site Photograph



Figure 2-12 Infill Rezone Program Sites 115 and 590 Site Map

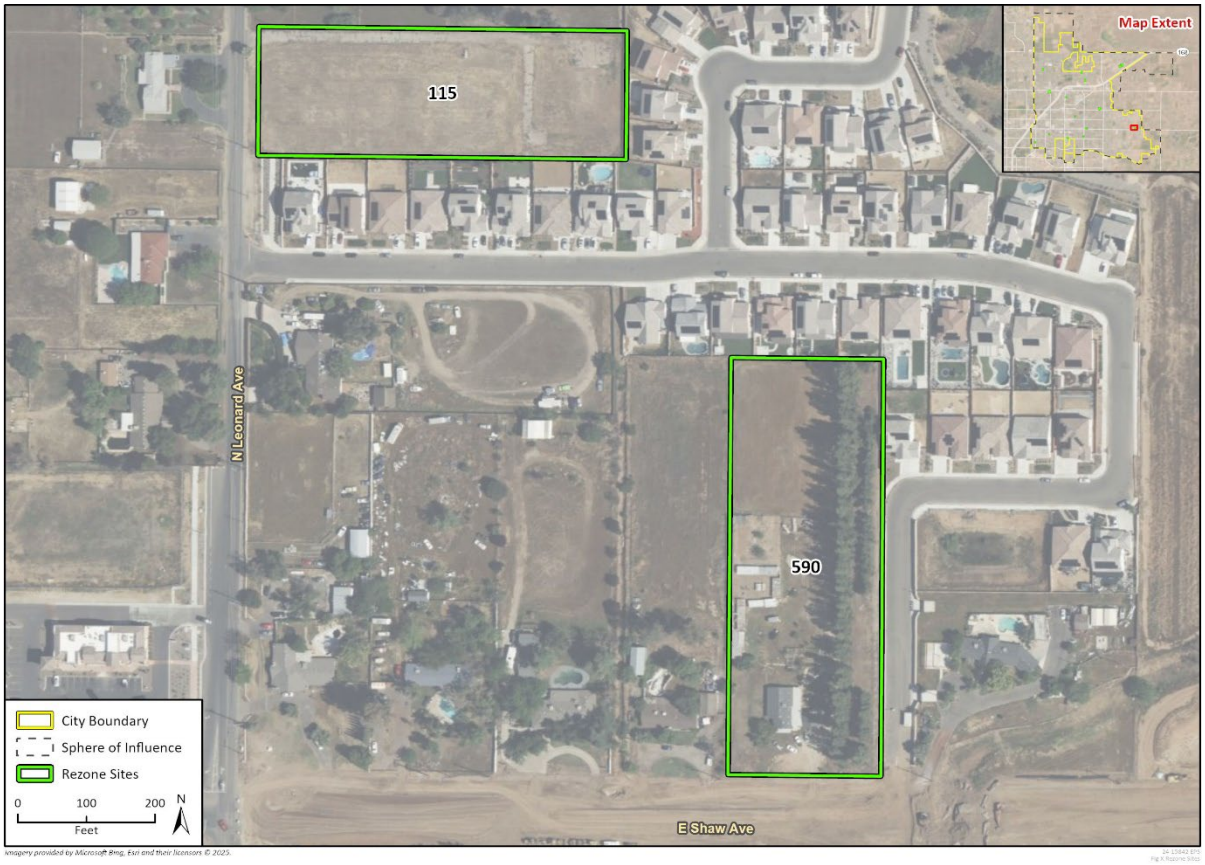


Figure 2-13 Infill Rezone Program Site 115 Site Photograph



Figure 2-14 Infill Rezone Program Site 590 Site Photograph



Figure 2-15 Infill Rezone Program Sites 157 and 197 Site Map

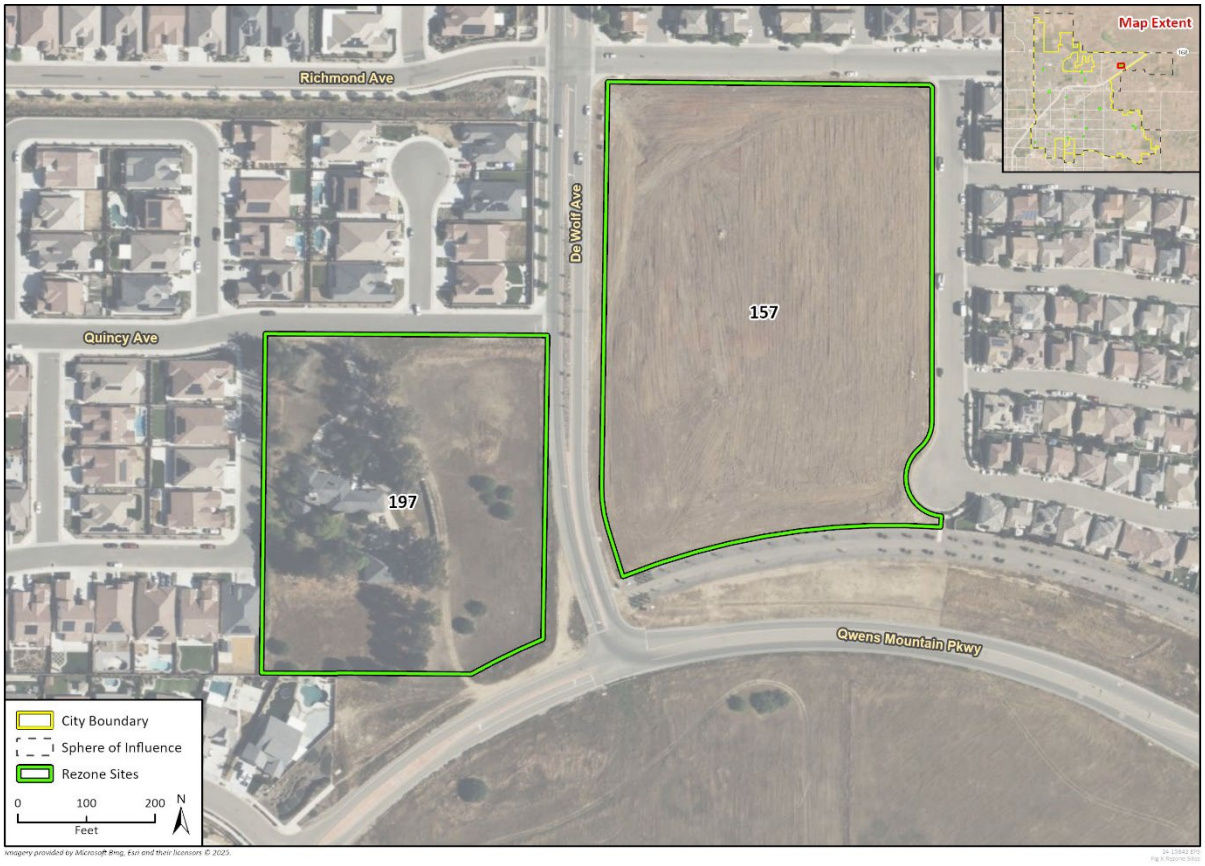


Figure 2-16 Infill Rezone Program Site 157 Site Photograph



Figure 2-17 Infill Rezone Site Program 197 Site Photograph



Figure 2-18 Infill Rezone Program Site 161 Site Map



Figure 2-19 Infill Rezone Program Site 161 Site Photograph



Figure 2-20 Infill Rezone Program Sites 167 and 168 Site Map



Figure 2-21 Infill Rezone Program Site 167 Site Photograph



Figure 2-22 Infill Rezone Program Site 168 Site Photograph



Figure 2-23 Infill Rezone Program Site 217 Site Map



Figure 2-24 Infill Rezone Program Site 217 Site Photograph



Figure 2-25 Infill Rezone Program Site 589 Site Map



Figure 2-26 Infill Rezone Program Site 589 Site Photograph



Figure 2-27 Infill Rezone Program Site 592 Site Map



Figure 2-28 Infill Rezone Program Site 592 Site Photograph



Figure 2-29 Infill Rezone Program Sites 595, 596, and 597 Site Map



Figure 2-30 Infill Rezone Program Site 595 Site Photograph



Figure 2-31 Infill Rezone Program Site 596 Site Photograph



Figure 2-32 Infill Rezone Program Site 597 Site Photograph



Figure 2-33 Infill Rezone Program Sites 598 and 599 Site Map

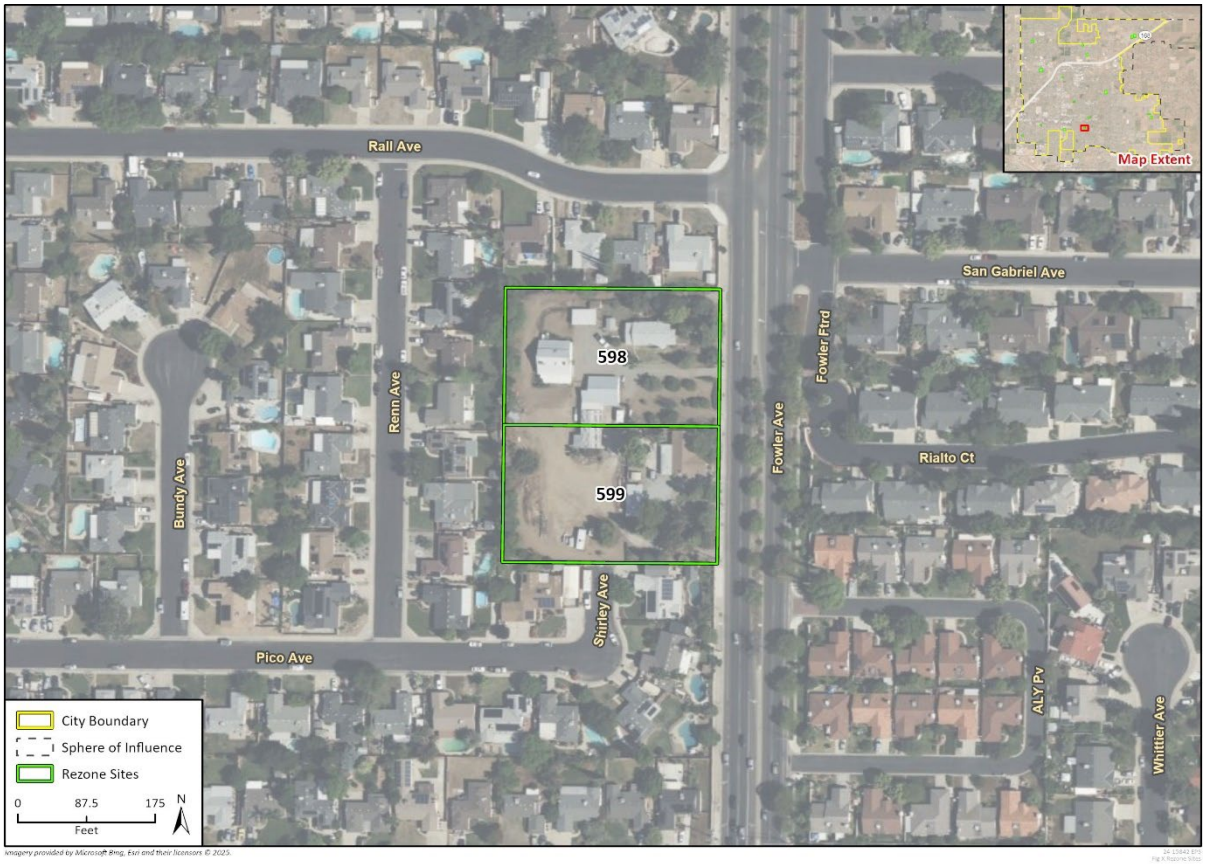


Figure 2-34 Infill Rezone Program Site 598 Site Photograph



Figure 2-35 Infill Rezone Program Site 599 Site Photograph



2.3.1 Development Potential

With the High and Very High Density Residential General Plan land use designations, the Infill Rezone Sites could be developed at a maximum density of 30 to 43 units per acre, respectively. If developed at the maximum density, the 20 sites could accommodate a total of 1,651 housing units with the proposed zoning. In order to fulfill Action Item 4 of the Judgment, and as required by applicable housing element law, the assumed development density for the R-3 zoned sites is 24.0 units per acre and the assumed development density for the R-4 zoned sites is 25.1 units per acre. Table 2-2 shows the unit potential by site. In total, the rezoned sites would conservatively facilitate the development of 1,303 housing units, with a 19 unit surplus over the required number of 1,284 units required by the Judgment.

Table 2-2 Summary of Units by Rezoning Site

Site ID*	APN	Existing Land Use Designation	Proposed Land Use Designation	Existing Zone	Proposed Zone	Size (acres)	Maximum Density	Maximum Unit Capacity	Density Assumption (du/ac)	Assumed Units
3	49102042	GC	H	P-C-C	R-3	8.06	30	242	24	193
63	56303207	L	H	R-1-7500	R-3	3.78	30	113	24	91
72	56008207	L	H	R-1-7500	R-3	3.19	30	96	24	77
108	49123124	GC	H	C-2	R-3	1.25	30	38	24	30
110	49906074	M	H	R-1	R-3	1.25	30	38	24	30
115	55457044S	M	H	R-1	R-3	2.31	30	69	24	55
157	55803359S	MU-V	H	P-C-C	R-3	7.24	30	217	24	174
161	43043316	O	H	C-P	R-3	1.67	30	50	24	40
167	55128004	O	H	C-P	R-3	1.04	30	31	24	25
168	55128003	O	H	C-P	R-3	1.3	30	39	24	31
197	55849230	VL	H	R-1-AH	R-3	4.5	30	135	24	108
217	49954013ST	I	H	M-1	R-3	1.8	30	54	24	43
589	55026023	L	H	R-A	R-3	8.01	30	240	24	192
590	55458036s	M	H	R-1	R-3	3.02	30	91	24	72
592	56303131	L	H	R-A	R-3	2.09	30	63	24	50
595	49817202	L	VH	R-1	R-4	0.41	43	18	25.1	10
596	49817201	L	VH	R-1	R-4	0.72	43	31	25.1	18
597	49817203	L	VH	R-1	R-4	0.41	43	18	25.1	10
598	49938442	L	H	R-1	R-3	1.09	30	33	24	26
599	49938441	L	H	R-1	R-3	1.18	30	35	24	28
Total						**54.32**		**1,651**		**1,303**

2.4 Project Objectives

The project includes the following objectives:

- Ensure compliance with the Judgment issued by the Fresno County Superior Court on March 19, 2024, in the *Martinez v. City of Clovis* case, by implementing Action Item 4: Infill Rezone Program.
- Provide capacity to meet the State-required RHNA carryover for lower income households related to the 4th and 5th Cycle Housing Element.
- Ensure that housing development that is affordable to lower income households is achievable, through associated amendments to the Zoning Map of the Development Code.
- Disperse housing sites throughout the City of Clovis (City) to ensure that no single neighborhood or area is overburdened or impacted.
- Encourage the development of additional housing and increase the overall availability of affordable housing by ensuring that development can occur at adequate densities by amending the Land Use Element of the General Plan.

2.5 Project Implementation

Although there is no physical development proposed as part of the project, completing the rezoning through Zoning Map and General Plan amendments for 20 sites would provide land available for housing development to occur at densities appropriate to fulfil the City's RHNA carryover and to comply with the terms of the Judgment. The rezoning of 20 infill sites to R-3 and R-4 and land use amendments to High and Very High Density Residential would create the capacity of a maximum of 1,651 additional housing units and comply with the requirements of the Judgment by facilitating the development of at least 1,284 additional housing units. For the 20 sites identified as part of the project, 1,303 housing units would be achievable at the assumed densities, which would surpass the requirement by 19 units.

2.6 Required Approvals

With recommendations from the City's Planning Commission, the City Council would need to take the following discretionary actions in conjunction with the proposed plan:

- Adoption of changes to the Land Use Map in the Land Use Element of the General Plan
- Approval of amendments to the City's Zoning Map of Title 9 Development Code of the Clovis Municipal Code

2.7 California Native American Tribal Consultation

The City of Clovis contacted California Native American Tribal governments by distributing Assembly Bill (AB) 52 and Senate Bill (SB) 18 notification letters via certified mail on March 26, 2025, to tribes with an affiliation with the project area based on a list provided by the Native American Heritage Commission (NAHC). Under AB 52, Native American tribes have 30 days to respond and request further project information and request formal consultation. Under SB 18, Native American tribes have 90 days to respond to request consultation. The City received two responses, one from the

Traditional Choinumni Tribe and the other from the Table Mountain Rancheria. Both tribes indicated they would like to be notified if cultural resources were identified, but did not request a formal consultation under AB 52 or SB 18. Therefore, no California Native American Tribes traditionally or culturally affiliated with the project area have requested consultation pursuant to Public Resources Code Section 21080.3.1.

3 Environmental Setting

This chapter provides a general overview of the environmental setting for the proposed project. More detailed descriptions of the environmental setting for each environmental issue area can be found in Chapter 4, *Environmental Impact Analysis*.

3.1 Regional Setting

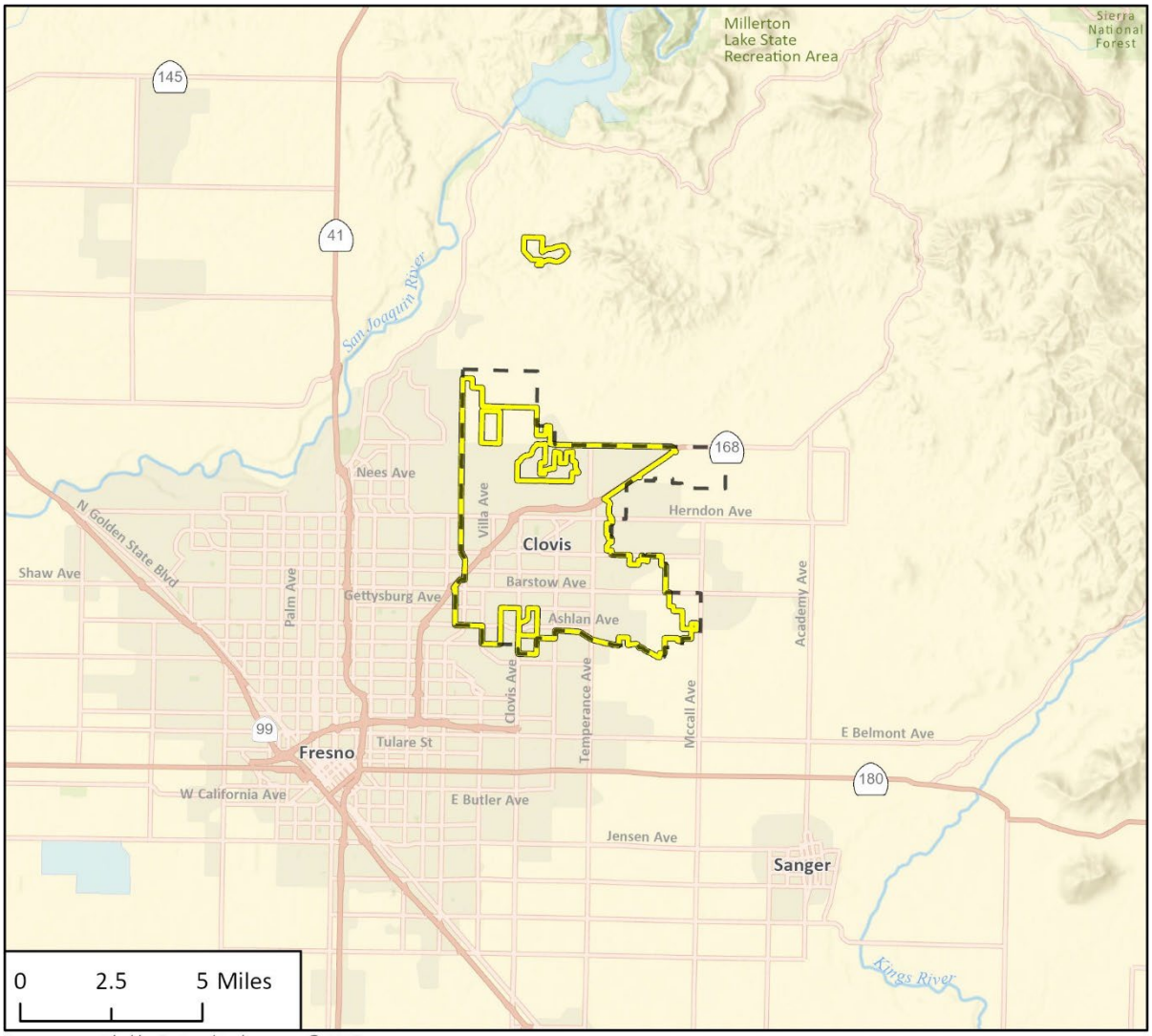
The City of Clovis (City) is located in the San Joaquin Valley in the central portion of Fresno County bordering the City of Fresno to the east. Clovis is in the northeast portion of the Fresno Metropolitan Area and is one of two incorporated cities making up the majority of the metropolitan area. The City is surrounded by portions of unincorporated Fresno County to the north, east, and south and by the City of Fresno to the west and southwest. The City, its sphere of influence (SOI), and specific areas beyond the City and its SOI (non-SOI Plan Area) are defined and referred to herein as the project area. The project occurs within the existing City limits. The total SOI encompasses 22,903 acres (approximately 35 square miles). The City's regional location is shown in Figure 3-1.

3.2 Natural Environment

The City is in the San Joaquin Valley; the foothills of the Sierra Nevada begin several miles east of the city limits. The terrain in the eastern and northeastern parts of the Plan Area is cut by numerous gullies and small canyons. The San Joaquin Valley is one of two valleys comprising the Great Valley Geomorphic Province, an alluvial plain approximately 400 miles long and 50 miles wide. The majority of the area within the current City boundary is urbanized; however, other portions of the SOI and the rural areas outside the City and its SOI contain undeveloped grasslands and hillsides. Natural biotic habitats, though not extensive within the City, are represented by remnant grasslands potentially supporting populations of state- and federal-listed species.

Although rapid urban expansion over the past few decades has resulted in significant loss of farmland in the City, some farms remain. The Clovis region can experience cyclical severe drought conditions. Agricultural irrigation water in the Fresno – Clovis region is obtained from two sources: surface water from the San Joaquin and Kings rivers; and local groundwater from the Kings Groundwater Subbasin. The planning area is in two hydrologic areas: the part of the project area southeast of the Friant-Kern Canal is in the Fresno Hydrologic Area, and the remainder of the project area is in the Academy Hydrologic Area. The City is within the drainages of three streams: from north to south, Dry Creek, Dog Creek, and Redbank Slough.

Figure 3-1 Regional Location



3.3 Planning Context

At the local level, the project area is generally bounded by East Sheperd Avenue on the north, Willow Avenue on the west, North McCall Avenue on the east, and Shields Avenue on the south. State Route 168 (SR-168) bisects the City from the southwest to the northeast. The majority of the City is urbanized, with residential and nonresidential development, mobility, and public facilities all contributing to Clovis's existing built environment. The City's incorporated boundaries encompass approximately 18,066 acres (28 square miles) and residential land uses occupy almost half of the land within the current City boundaries. Other major land uses include agriculture, commercial, industrial, office, public/park, and utilities. The majority of the commercial uses are generally concentrated along Shaw, Herndon, and Clovis Avenues. All of the potential Infill Rezone Program sites are located within city limits.

3.3.1 Land Use/Zoning Designations

The project area offers opportunities for employment and sustainable quality neighborhoods in all three growth areas along major transportation corridors. The City's land use and zoning maps identify the various uses throughout the City, including residential, commercial, industrial, office, and public facilities. The largest zoning designation within the City boundary is Single-Family Residential, with commercially zoned areas the second largest.

3.3.2 Rezoning Sites Setting

The identified Infill Rezone Program sites are all located within the existing City limits and are largely vacant or are developed with low density uses. As discussed in Chapter 2, *Project Description*, some of the sites contain existing single-family residences, this includes Site 3, Site 63, Site 72, Site 197, Site 590, Site 592, Site 598, and Site 599. Site 3 also contains an existing sports facility and seasonal tree lot, Site 217 contains an existing commercial business, the Clovis Academy of Gymnastics and Dance, and Site 589 is the site of the former Rogers Helicopters.

3.4 Cumulative Impact Setting

In addition to the specific impacts of individual projects, the California Environmental Quality Act (CEQA) requires environmental impact reports (EIRs) to consider potential cumulative impacts of the proposed project, as this Environmental Assessment (EA) acts as a draft EIR, this document will follow that requirement. CEQA defines "cumulative impacts" as two or more individual impacts that, when considered together, are substantial or will compound other environmental impacts. Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. Cumulative impact analysis allows the EA to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

CEQA requires cumulative impact analysis to consider either a list of planned and pending projects that may contribute to cumulative effects or a forecast of future development potential. Since the Infill Rezone Program involves the rezoning of 20 properties throughout the city, cumulative impacts are treated somewhat differently than they would be for a specific development. Section 15130 of the *CEQA Guidelines* provides the following direction relative to cumulative impact analysis:

> Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

Because the proposed project is essentially a set of guidelines for projects that could occur within the timeframe of the project, the project itself represents the cumulative development scenario for the reasonably foreseeable future in the area of the project. Cumulative effects would occur from development associated with buildout of the Infill Rezone Program sites combined with effects of development on land within and around the City and region through the horizon year of the City General Plan. This EA generally relies on the 2014 PEIR cumulative assumptions for growth forecasted in the 2014 City of Clovis General Plan and Development Code Update, and the Fresno Council of Governments (Fresno COG) Regional Transportation Plan and Sustainability Communities Strategy (RTP\SCS) Program EIR. A broad examination of cumulative impacts involves considering buildout of the project together with growth and new development in these surrounding jurisdictions. For example, growth within the City and adjacent jurisdictions would result in increased traffic on area roadways and regional facilities.

The geographic area considered for each cumulative impact depends upon the topic that is being analyzed. For example, in assessing air quality impacts, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions are the best tool for determining the cumulative effect. Each section in Chapter 4, Sections 4.1 through 4.16, contain subsections that identify the specific parameters for the cumulative evaluation. Fresno COG estimates anticipated growth for Fresno County's cities and unincorporated areas for allocating growth to specific areas and identifying regional transportation infrastructure needed to support regional growth. The land uses and associated potential development that would result from buildout of the Infill Rezone Program sites generally correlate to Fresno COG's 2050 regional growth forecasts.

A significant impact would occur if the project's contribution to the cumulative effect is determined to be significant. Sections 4.1 through 4.16 each provides a subsection with an overview of the potential cumulative impacts that could occur followed by a summary of the project's potential contribution to that cumulative effect. The subsection concludes with a determination of the significance of the project.

4 Environmental Impact Analysis

As discussed in detail in Chapter 1, *Introduction*, the California Environmental Quality Act (CEQA) does not apply to any discretionary actions necessary to bring the City of Clovis' (City) general plan or relevant mandatory elements of the plan into compliance with any court order or judgment; provided the City prepares an initial study, and if necessary, an environmental assessment (EA) as required by Government Code (GC) section 65759. The Infill Rezone Program is necessary to bring the City's Housing Element into compliance with the judgment entered by the Superior Court in the *Martinez v. City of Clovis* case on March 19, 2024. Therefore, CEQA does not apply to the proposed discretionary actions detailed in Chapter 2, *Project Description* (i.e., the Project). However, preparation of an "EA" that substantially conforms to the required content for a draft environmental impact report (EIR) is required (GC § 65759(a)). Therefore, this document constitutes the required "EA" and conforms to the required content for a draft EIR as described in CEQA Guidelines, Article 9 (California Code of Regulations (CCR)., Title 14, § 15120 et seq.).

Organization and Content

This EA addresses in detail the "potentially significant impacts" concerning the environmental issue areas under Appendix G of the CEQA Guidelines.

Sections 4.1 through 4.16 contain a detailed environmental analysis of the existing environmental setting (baseline conditions), existing regulatory setting, project impacts (i.e., direct and indirect, short-term construction and long-term operational), relevant General Plan Policies, recommended mitigation measures, and significant unavoidable impacts. Cumulative impacts analysis can be found in each environmental issue section.

Each potentially significant environmental issue area is organized into the following subsections:

1. **Setting** describes the physical environmental conditions in the proposed project vicinity that could influence or affect the issue under investigation, as they exist at the time environmental analysis was commenced, from both a local and regional perspective.
2. **Regulatory Setting** outlines and discusses the laws, ordinances, regulations, and standards applicable to the project.
3. **Impact Analysis** provides the thresholds that are the basis of conclusions of significance and includes an "Impacts" analysis for each threshold.

   The primary sources of the thresholds include:

   - CEQA Guidelines Appendix G criteria (CCR, Title 14, §§ 15000 – 15387)
   - Local, State, Federal and other standards applicable to an impact threshold
   - Officially established significance thresholds.

   CEQA Guidelines section 15064(b) specifies that "...An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting." Principally, "...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 and aesthetic significance" constitutes a significant impact (*CEQA Guidelines* section 15382).

The "Impacts" analysis for each threshold describes potential environmental changes to the existing physical conditions that could occur if the proposed project is implemented. Evidence, based on factual and scientific data, is presented to show the cause-and-effect relationship between the proposed project and the potential changes in the environment. All potential direct and reasonably foreseeable indirect, construction-related (short term), and operation (long-term) effects are considered. Generally, impacts are classified as no impact, less than significant impact, less than significant impact with mitigation, or potentially significant impact. This EA uses the following terminology to describe the project's environmental impacts:

- **No Impact** – the proposed project would not have any measurable environmental impact.
- **Less Than Significant Impact** – the proposed project could impact the environment, although this impact would be below established thresholds of significance.
- **Less Than Significant Impact With Mitigation** – the proposed project would have the potential to generate an impact, which may be considered as a significant effect on the environment, although mitigation measures or changes to the Project's physical or operational characteristics would reduce this impact to a level that is less than significant.
- **Significant Unavoidable Impacts** – describes impacts that would be significant and cannot be feasibly mitigated to a level that is less than significant, and thus would be unavoidable.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact.

4. **Cumulative Impacts** identifies potential environmental impacts of past, present, and reasonably foreseeable future projects, in combination with implementation of the proposed project.

The Executive Summary of this EA summarizes all impacts and mitigation measures that apply to the Project.

4.1 Aesthetics

This section summarizes the aesthetic resources in the City and analyzes the project's potential impacts on aesthetics, including impacts to scenic vistas, scenic resources, visual character, visual quality, and light and glare, due to implementation of the project.

4.1.1 Setting

The City's physical setting on the San Joaquin Valley floor affords scenic views of the Sierra Nevada and stretches of open space and undeveloped land in the rural parts of the City and beyond to the north and east. Poor air quality, however, often obscures views of the surrounding mountain range, especially during winter when particulates and ozone are trapped by a dense layer of hot air close to the San Joaquin Valley floor. Views of the Sierra Nevada occasionally improve in the summer months when strong winds push some pollutants to the south of the Valley. On clear visibility days, the mountains provide Clovis residents and visitors with a scenic backdrop and orienting features that physically and culturally define the community.

Visual Character

Clovis is in California's San Joaquin Valley, and like most communities in the region, features a flat landscape organized around a mostly rectangular system of roadways. Due to its rapid growth in recent years and its proximity to the City of Fresno, Clovis has a largely suburban character. A majority of the City's land area is devoted to low density residential neighborhoods. However, because the community has grown from a small farming town, it is still surrounded by agricultural land uses on three sides, so retains a rural atmosphere. The suburban/rural interface is most prominent on the City's eastern, southeastern, and southern edges. In these locations, new housing subdivisions are situated between working farms and large residential estate lots of two to five acres. The project area beyond the City's boundaries to the north and northeast is dominated by agricultural uses and undeveloped open spaces with its western boundary adjacent to the City of Fresno.

Natural Resources

The City's greatest natural resource, though outside the City's boundaries, is commonly considered to be the Sierra Nevada. The mountains' foothills begin just beyond the northeast boundary of the City's project area, and views of the mountains are visible from Clovis on clear days. The foothills extend to an elevation of 2,500 feet above sea level at the United States Forest Service (USFS) Sierra National Forest boundary. Within the Sierra National Forest, the mountains climb to a maximum elevation of 14,000 feet. The foothills and the mountains of the Sierra include forests, meadows, lakes, rivers, and wildlife scenic backdrops for the City.

There are no substantial, undeveloped natural resources within the City boundary other than grasslands in the northeast of the city, north of Shepherd Avenue and Tollhouse Road/State Route 168 (SR-168). Outside of this area there are only remnants of native habitats and vegetation communities. There are irrigation canals throughout the city that provide a scenic view of water and rural character. Other improved natural resources, such as parks and green space, offer recreational opportunities and natural landscapes to residents and visitors. This includes the botanical gardens and a network of multipurpose trails. These open spaces also provide visual buffers that break up the visual uniformity of the City's built environment.

Scenic Vistas and Corridors

According to the California Scenic Highway Mapping System, there are no official state-designated scenic highways in or near the City.[1] In addition, there are no adopted scenic vistas in the City. SR-168 bisects the city in a southwest to northeast direction and is considered an Eligible State Scenic Highway–Not Officially Designated.[2] SR-168 offers limited views of the Sierra Nevada mountain range, most often at elevated freeway sections and interchanges.

The Clovis General Plan addresses scenic "landscape features" within its Open Space and Conservation Element. This element designates Clovis, Shaw, and Herndon Avenues as key gateways into the community and highlights their role as important visual connectors between the greater Fresno area and Old Town Clovis. It notes that "the identity of the gateways will be established through landscape design and features reflecting the historic and 'small town' atmosphere." While these three corridors are extensive and include segments that lack scenic views, they serve as major arterial routes running east–west and north–south through the city's urban core. These corridors not only facilitate physical connectivity between neighborhoods, but also contribute to visual cohesion, helping to unify the community. Additional east–west arterials—such as Shepherd, Bullard, and Ashlan Avenues—traverse the city's suburban and rural edges and may also be considered scenic corridors under the City's General Plan. These roads offer a visual and character transition from the nearly built-out central area of Clovis to its surrounding pastoral and agricultural landscapes to the north, east, and south.

There is one trail located within the city, Dry Creek trail, which could be considered a scenic corridor, although not officially designated in the General Plan. Access to the trail is located on the southwest corner of Sunnyside and Shepherd Avenues in northern Clovis and consists of approximately five miles of walking path throughout the city.

The aesthetic and community significance of the city's central district and primary corridors is further discussed below.

Old Town Clovis

Clovis's rural heritage is reflected in the architecture of its central district. Old Town Clovis features a mix of restored historic buildings and newer developments that honor and showcase the area's western American, frontier-era architectural style. This distinctive character is a key element of the community's identity. While Old Town Clovis is recognized for its small-town charm within the larger city, it has also experienced significant revitalization and redevelopment, emerging as a vibrant and welcoming historic district within a modernizing urban context. Enhancements to the area include cobblestone intersections, vintage-style streetlamps, and charming storefronts. The district also contains several notable historic landmarks such as the Tarpey Depot—the last remaining structure from the Minarets and Western Railroad—and the 1912 First State Bank Building, now home to the Clovis Museum, operated by the Clovis-Big Dry Creek Historical Society. In addition to its architectural and historical significance, Old Town Clovis serves as the primary venue for many of the city's major community events, including Big Hat Days, the Clovis Rodeo, and ClovisFest, which attract tens of thousands of visitors from across California and beyond.

[1] California State Scenic Highways. Caltrans. 2025. Accessed May 2025: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
[2] Caltrans. 2025List of eligible and officially designated State Scenic Highways. Accessed May 2025: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx

Shaw Avenue

Shaw Avenue functions as one of the primary transportation corridors within Clovis's central business district. It serves as a major east–west route for traffic heading toward the Sierra foothills and supports a mix of neighborhood commercial, office, and residential land uses. Moving from east to west, the corridor transitions from agricultural and rural residential areas to more urbanized and developed zones, with pockets of mixed-use and commercial development interspersed throughout. The segment of Shaw Avenue between Clovis Avenue and Temperance Avenue is regulated by the Shaw Avenue Specific Plan, adopted in 1994. This plan seeks to enhance the corridor's livability and vibrancy as a key commercial spine, linking California State University, Fresno with older, economically disadvantaged neighborhoods to the west and Central Clovis to the east. This Specific Plan designates the corridor for land uses compatible with the existing landscaped boulevard concept, aiming to maintain a cohesive standard of design, signage, and landscaping. The plan also promotes a concentration of residential development in the eastern portion of the corridor, while reserving the western portion for commercial uses. Further west, the Shaw Avenue Corridor Plan applies to a 2.5-mile stretch between SR-168 and Clovis Avenue.

Clovis Avenue

The Clovis Avenue corridor is a heavily traveled north-south street which cuts through much of the more developed areas of Clovis on the west side of the City, considered the main street of Clovis. A portion of Clovis Avenue is governed by two specific plans, the Central Clovis Specific Plan (from Barstow Avenue to Sierra Avenue) and the Herndon-Shepherd Specific Plan (from Herndon Avenue to Shepherd Avenue). These plans supplement the General Plan by providing additional design direction and policy guidance aimed at revitalizing the corridor and strengthening its role as a connector between Old Town Clovis, the Civic Center to the south and its central business district immediately south.

In particular, the Central Clovis Specific Plan is intended to complement the revitalization efforts of Old Town by providing architectural, landscape and site design guidelines to establish a distinctive gateway and cultural center for the region. The specific plan also calls for transportation enhancements for pedestrians and bicycles along Clovis Avenue. The Central Clovis Specific Plan includes design strategies to enhance the visual quality of North Clovis Avenue, which functions as a key northern gateway into the city and its central business district.

Light and Glare

Sources of light and glare in the City include lighting from buildings (interior and exterior), security, sign illumination, and parking areas. Other sources of nighttime light and glare include streetlights and vehicular traffic along surrounding roadways. Additionally, a significant amount of ambient lighting comes from surrounding communities and roadways. Because the City is adjacent to highly urbanized portions of Fresno to the west and south, ambient light in the community is substantially impacted by land uses in Fresno. Large, light-intensive institutions and facilities near the City's boundary include Fresno Yosemite International Airport and California State University, Fresno.

4.1.2 Regulatory Setting

a. Federal Regulations

There are no Federal regulations regarding aesthetics that are relevant to the project.

b. State Regulations

California Scenic Highway Program

Caltrans maintains the California Scenic Highway Program, enacted in 1963, to protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to those highways. The Caltrans Scenic Highway program allows local jurisdictions to officially designate a Scenic Highway to ensure protection of the visual resources along its corridor. Caltrans identifies highways as eligible for the program, and the local jurisdiction applies to be officially designated. The status of a proposed State Scenic Highway changes from eligible to officially designated when the local governing body applies to Caltrans for Scenic Highway approval, adopts a Corridor Protection Program, and receives notification that the highway has been officially designated a Scenic Highway. Protection of visual resources for the designated corridor includes regulating land use and development, outdoor advertising, landscaping, and building design. SR-168 is listed as eligible for the States Scenic Highway program, however, there are currently no designated State Scenic Highways in Clovis[3].

c. Local Regulations

City of Clovis Design Guidelines

The City of Clovis maintains multiple design guidelines and standards to assist project developers/applicants and project designers in understanding the City's goals and objectives for achieving, enhancing, and maintaining high-quality development in various areas of the City. The Clovis Old Town Design Guidelines outline design concepts in Clovis' central business district (primarily Clovis and Woodworth Avenues between Sierra and Jefferson Avenues) to maintain consistency with existing architecture, lighting, materials, facades, and landscape. The Commercial Design Standards require new commercial projects constructed in C-1 and C-2 designated zones to comply with specific standards related to setbacks, parking, landscaping, architectural elevation, lighting, walls and fencing, utilities, and security. The Central Valley Research and Technology Business Park Design Standards guides architectural development in the northeast region of the City along SR-168 between Armstrong Avenue and Owens Mountain Parkway. The City also has a published list of approved drought-tolerant and noninvasive plants for use in landscaping for residential and commercial developments.[4]

City of Clovis Specific Plans

Aesthetic considerations within the City are guided by four specific plans that apply to designated areas: Central Clovis, Herndon-Shepherd, Loma Vista, and Shaw Avenue. Each of these plans serves as a regulatory framework that informs development and design within its respective area. The level

[3] California State Scenic Highways. Caltrans. Accessed: April 2025 https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
[4] City of Clovis. Drought Tolerant Plants. Accessible at: https://cityofclovis.com/wp-content/uploads/2018/10/Drought-Tolerant-Plant-List.pdf

of detail varies among the plans—some, such as the Central Clovis Specific Plan, provide comprehensive development standards and design guidelines, while others rely more heavily on the City's municipal code for aesthetic direction.

City of Clovis Master Plans

At the time of the writing of this Environmental Assessment (EA), the City of Clovis has multiple adopted Master Plans that outline the design and visual character standards for the subject neighborhoods.

Harlan Ranch Master Plan

The Harlan Ranch Master Plan is located in the northeast Harlan Ranch neighborhood in the city, bounded by Shepherd Avenue and DeWolf Avenue, north of Highway 168. The Master Plan area consists of approximately 389 acres. Infill Rezone Program Site 157 is located within the Harlan Ranch Master Plan Area. The Master Plan goals include encouraging a mix of housing market economic levels, and increased densities.

Heritage Grove Master Plan

The Heritage Grove Master Plan area is one of the three Urban Centers identified in the General Plan to accommodate growth. The Master Plan establishes the overall architectural, landscape, sand site elements, as well as and outlines the design and treatment standards and qualities specific to the area. The site is made up of four square miles in the northwest of the City bounded by Willow Avenue, Copper Avenue, and Shepherd Avenue. There are no Infill Rezone Program sites located within the Heritage Grove Master Plan.

Home Place Master Plan

The Home Place Master Plan is located within the Southeast Urban Center of the Loma Vista Specific Plan, and consists of 310 acres east of Leonard Avenue, west of Thompson Avenue, north of Ashlan Avenue and south of Gettysburg Avenue. The Master Plan outlines the design and visual character guidelines outlined in the Loma Vista Specific Plan. There are no Infill Rezone Program sites located within the Home Place Master Plan.

Dry Creek Preserve Master Plan

The Dry Creek Preserve Master Plan outlines the visual and design standards specific to the area. The Dry Creek Master Plan area is located within the Herndon-Shepherd Specific Plan area. The area is predominantly large residential or agricultural parcels. A portion of the Master Plan area west of North Fowler Avenue is within the City's boundaries. There are no Infill Rezone Program sites located within the Dry Creek Preserve Master Plan.

City of Clovis Municipal Code

Section 9.22.050 of the Clovis Municipal Code (CMC) outlines exterior light and glare specifications for exterior lighting, stating exterior lighting shall be:

a. Architecturally integrated with the character of on-site and adjacent structure(s);
b. Directed downward and shielded so that all direct light and glare is confined within the boundaries of the subject parcel;
c. Installed so that lights do not blink, flash, or be of unusually high intensity or brightness; and

d. Appropriate in height, intensity, and scale to the uses they are serving. Additionally, light sources shall be shielded to direct light rays onto the subject parcel only and the light source, whether bulb or tube, shall not be directly visible from an adjacent property or public street rights-of-way.[5]

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. The analysis is inherently subjective because viewers react to views and aesthetic conditions differently. This evaluation measures the existing visual environment of the city against implementation of the project, analyzing the nature of the anticipated change. The project in and of itself does not contain specific development proposals that would result in physical changes to the environment such that impacts to aesthetics would occur. Therefore, this analysis focuses on impacts associated with implementation of the rezonings which would facilitate development of Infill Rezone Program sites listed in Table 2-1 in Chapter 2, *Project Description* in terms of arrangement of open space to built density and intensity of development, and building height according to the thresholds of significance discussed below. The existing visual character and context of the City is shown and described in Section 4.1.1, *Setting,* of this EA.

Significance Thresholds

According to the *California Environmental Quality Act (CEQA) Guidelines* Appendix G, impacts related to aesthetics (AES) would be potentially significant if the project would:

1. Have a substantial adverse effect on a scenic vista
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; or, in urbanized areas, conflict with applicable zoning and other regulations governing scenic quality
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area

b. Project Impacts and Mitigation Measures

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?

Impact AES-1 FUTURE DEVELOPMENT CARRIED OUT UNDER THE PROPOSED PROJECT WOULD NOT AFFECT PUBLIC VIEWS OF A SCENIC VISTA. POTENTIAL IMPACTS TO SCENIC VISTAS AND CORRIDORS WOULD BE LESS THAN SIGNIFICANT.

The proposed project does not propose specific development projects that would have a substantial negative impact on public views or scenic vistas and routes/corridors. The project includes 20 Infill

[5] City of Clovis. Exterior Light and Glare. Clovis Municipal Code Accessed May 2025: https://www.codepublishing.com/CA/Clovis/html/Clovis09/Clovis0922.html

Rezone Program sites located throughout the city in infill areas where there is already existing development. The proposed project does not include physical development projects but would allow for increased density on the Infill Rezone Sites, which would include increased building density and height. Views of scenic vistas could change incrementally as development of the sites occurs but would be limited due to the flat terrain of the City. Future developments would undergo development and design review on a project-by-project basis to identify and address project-specific impacts to scenic vistas. However, the sites have minimal potential for potential development to obscure or substantially degrade views of scenic vistas or views within scenic routes and corridors as the Infill Rezone Program sites are located within areas of the city where there already exists development obstructing views.

Dry Creek Trail consists of an approximately five-mile walking path throughout the city that is an aesthetic resource in Clovis. The trailhead is located on the southwest corner of Sunnyside and Shepherd Avenues in northern Clovis. Of the four closest sites to the trail, sites 157 and 197 are located approximately three miles from the trail and future development at those sites would not be visible from the trail. Site 63 and Site 592 are both approximately one mile from the trail where the path is adjacent to the Clovis Botanical Garden and Dry Creek Park. Developed urban areas exist between both sites and the trail area negating any aesthetic impact from development of those sites.

Development and redevelopment that may occur under the proposed project at any of the sites, including the sites near Dry Creek Trail, would be governed by the policies listed below, as well as design standards contained in the CMC. These would be applied and enforced through the City's standard development review procedures that concern the protection of public views or scenic vistas.

CMC sections that would guide the project related to visual character and quality include:

- **Chapter 9.28:** Landscaping Standards
- **Chapter 9.30:** Tree Protection Standards
- **Chapter 9.110:** Subdivision Standards

Policies in the General Plan that would guide the proposed project related to visual character and quality include:

Open Space and Conservation Element

Goal 2: Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

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

As there are no state designated scenic corridors or highways, nor officially designated scenic vistas in the City and protection of public views and scenic vistas is enforced by the CMC and existing General Plan policies, impacts to scenic vistas, including scenic routes and corridors, would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THE PROJECT IS NOT NEAR A DESIGNATED STATE SCENIC HIGHWAY, SO IT WOULD NOT DAMAGE SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.1.1 Settings, SR-168 is eligible for State Scenic Highway Program designation, as identified by Caltrans, but is not designated as such. None of the Infill Rezone Program sites are located along the eligible section of this highway which transects Clovis from east to west.[6] As there are no officially designated Scenic Highways in the planning area, potential impacts to trees, rock outcroppings, and historic buildings within a state scenic highway would not be visible.

A State Scenic Highway changes from "eligible" to "officially designated" when the local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for Scenic Highway approval, and receives notification from Caltrans that the roadway has been designated as a Scenic Highway. The Infill Rezone Program sites are not visible from SR-168 (or vice versa) and the highway traverses through urban areas of the city, so even if it was to be designated in the future, impacts would be less than significant.

Therefore, potential impacts to scenic resources visible from eligible State Scenic Highways associated with the proposed project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 THE PROPOSED PROJECT IS IN AN URBANIZED AREA AND WOULD BE DEVELOPED IN CONFORMANCE WITH APPLICABLE ZONING REGULATIONS GOVERNING SCENIC QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed project does not include any physical development; however, the land use changes envisioned under the proposed project may alter the visual character of various areas in Clovis as development would occur at higher densities among the 20 Infill Rezone Program sites compared to existing conditions. The projects would be required to conform with all design, density, and height guidelines applicable to the new land use designations and zoning and therefore would not create a conflict with regulations governing scenic quality.

Policies in the General Plan that would affect the proposed project related to visual character and quality include:

[6] Caltrans. List of eligible and officially designated State Scenic Highways. 2024. Accessed: April 2025. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

Open Space and Conservation Element

Goal 2: Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

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

This change in density compared to what is currently allowed would not dramatically increase heights or the type or style of development compared to what is currently allowed or exists near the 20 sites and would still be regulated by City development standards. Impacts regarding conflicts with applicable zoning and other regulations governing scenic quality would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 NEW DEVELOPMENT CARRIED OUT UNDER THE PROPOSED PROJECT WOULD ADD NEW SOURCES OF LIGHT AND GLARE TO THE CITY, HOWEVER DEVELOPMENT WOULD BE REQUIRED TO COMPLY WITH THE CITY'S LIGHTING REGULATIONS TO NEGATE ADVERSE EFFECTS ON DAYTIME OR NIGHTTIME VIEWS. IMPACT WOULD BE LESS THAN SIGNIFICANT.

The proposed project does not include any physical development; however, the project would facilitate development at increased height and densities. This would result in the creation of new sources of light from exterior building illumination, outdoor lighting, and glare from reflective building surfaces and vehicle surfaces or the headlights of vehicular traffic from future development. As a result, these new sources of light or glare could affect adjacent light-sensitive land uses.

As all 20 of the Infill Rezone Program sites are infill locations, ambient light from urban uses already exists. The proposed project is anticipated to facilitate the development of 1,303 housing units. Such development would occur in areas that are already at least partly developed. Thus, the proposed project would not in itself substantially increase light and glare beyond existing conditions or levels already allowed under current City regulations and policies. Additionally, the CMC addresses lighting regulations.[7] Examples of these standards include light and glare regulations and shielding requirements for the prevention of light spillage and illumination on adjacent properties.

Development facilitated by the project would be subject to review to ensure consistency with the light and glare regulations for the City. Accordingly, highly reflective materials capable of generating substantial amounts of glare would be avoided in development of the sites. Some reflective material may be unavoidable, such as glass used in windows of new buildings. However, glare from building windows would be consistent with existing conditions and need to meet City requirements for reducing glare such as coatings to reduce this source of glare.

[7] Clovis Municipal Code. Article 3 (Development and Operational Standards), Division 9.22 (Performance Standards), Section 9.22.050 (Exterior Light and Glare). Accessed May 2025: https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis0922.html#9.22.050

CMC sections that would affect the project related to light and glare include:

- **Chapter 9.22.050:** Exterior Light and Glare

Adherence to these standards to reduce light and glare from new projects would reduce new sources of substantial light and glare from development at these 20 Infill Rezone Program sites. Based on the discussion above and need to conform with City regulations, the proposed project would not create new sources of substantial light or glare that would adversely affect day or nighttime views in the area, and this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.1.4 Cumulative Impacts

Future development facilitated by the project in existing developed areas could result in aesthetic impacts. Such impacts would be site-specific with future projects facilitated by the project having limited to no cumulative aesthetic impact to each other due to their lack of proximity to one another. Discretionary projects would require separate discretionary approval and evaluation under CEQA, which would address potential impacts to site specific visual resources and identify necessary mitigation measures, where appropriate. Even ministerial (non-discretionary) projects carried out in the city would be subject to the City's ministerial development review procedures. These projects taken together as a whole could increase the impression of urbanization and development in the city but, as discussed throughout this section of the EA (and especially Impact AES-3) and in Chapter 2, *Project Description* of this EA. This development would be carried out with individual developments on the 20 Infill Rezone Program sites located within the City. The 20 sites proposed to be rezoned are on infill locations throughout the city with adjacent compatible land use designations and zoning. Consequently, future development carried out under the proposed project would not result in significant cumulative environmental impacts in conflict with aesthetics requirements for preserving visual character, public views, scenic vistas and resources, or requirements for minimizing and controlling potential light and glare. Therefore, the project would not cause a cumulatively considerable impact on aesthetics, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.2 Air Quality

This section analyzes the impacts of the City of Clovis (City) Infill Rezone Program Project on local and regional air quality. Both construction and operational emissions associated with development facilitated by the proposed project are discussed. The analysis herein is based partially on the Transportation Impact Analysis dated June 20, 2025, prepared by Kittelson for this Environmental Assessment (EA).

4.2.1 Setting

a. Climate and Meteorology

Air quality is affected by the rate and location of pollutant emissions and by climatic conditions that influence the movement and dispersion of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local and regional topography, provide the links between air pollutant emissions and air quality.

The City is part of the San Joaquin Valley Air Basin (SJVAB), which occupies the southern half of the Central Valley and comprises eight counties: San Joaquin, Stanislaus, Fresno, Merced, Madera, Kings, Tulare, and portions of Kern. The SJVAB is approximately 250 miles long and 35 miles wide (on average) and is bordered by the Coast Ranges on the west, the Sierra Nevada on the east, and the Tehachapi Mountains to the south. On the valley floor, the SJVAB is open only to the north, which heavily influences prevailing winds.[1]

Although marine air generally flows into the SJVAB from the San Francisco Bay Area through the Carquinez Strait (a gap in the Coast Ranges) and low mountain passes such as Altamont Pass and Pacheco Pass, the mountain ranges restrict air movement through the SJVAB. The SJVAB is in a Mediterranean climate zone and is influenced by a subtropical high-pressure cell most of the year. Mediterranean climates are characterized by sparse rainfall, which occurs mainly in winter. Summers are hot and dry. Summertime maximum temperatures often exceed 100°F in the valley. The subtropical high-pressure cell is strongest during spring, summer, and fall and produces subsiding air, which can result in temperature inversions in the valley. A temperature inversion can act like a lid, inhibiting vertical mixing of the air mass at the surface. Any emissions of pollutants can be trapped below the inversion. Most of the surrounding mountains are above the normal height of summer inversions (1,500–3,000 feet). Winter-time high pressure events can often last many weeks, with surface temperatures often lowering into the 30°F. During these events, fog can be present and inversions are extremely strong. These wintertime inversions can inhibit vertical mixing of pollutants to a few hundred feet.[2]

b. Air Pollutants of Primary Concern

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants.[3] Under these laws, the U.S. Environmental Protection Agency (U.S. EPA) and the

[1] San Joaquin Valley Air Pollution Control District [SJVAPCD]. 2015. Guide for Assessing and Mitigating Air Quality Impacts, March 19, 2015. Accessible at: https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF
[2] Clovis. 2014. General Plan and Development Code Update Draft Program Environmental Impact Report Volume 1: Draft PEIR and Appendix A (SCH # 2012061069). Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php
[3] Ambient Air Quality Standards. 2016. Last Modified May 4, 2016, accessed January 2022: https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf

California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG), nitrogen oxides (NO_X), particulate matter with diameters of up to 10 microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates, otherwise known as smog. The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

Ozone

Ozone is produced by a photochemical reaction between NO_X and ROG triggered by sunlight. NO_X form during the combustion of fuels, while ROG form during combustion and evaporation of organic solvents. Because ozone requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. Ozone is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

Carbon monoxide is a local pollutant that is found in high concentrations only near the source. The major source of carbon monoxide, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high-traffic volumes. Carbon monoxide's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, carbon monoxide reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.[4]

Nitrogen Dioxide

Nitrogen dioxide is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide, but nitric oxide reacts rapidly to form nitrogen dioxide, creating the mixture of nitric oxide and nitrogen dioxide commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between nitrogen dioxide and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur.[5] Nitrogen dioxide absorbs blue light and causes a reddish-brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Particulate Matter

PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are

[4] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants
[5] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants

mostly dust particles, nitrates, and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads and are emitted directly into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates between 2.5 and 10 microns in diameter and fine particulates ($PM_{2.5}$) can be very different. Small particulates generally come from windblown dust and dust kicked up from mobile sources. Fine particulates are associated generally with combustion processes, as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Sulfur Dioxide

Sulfur dioxide is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of sulfur dioxide emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of sulfur dioxide emissions include industrial processes such as extracting metal from ore and the burning of fuels with a high-sulfur content by locomotives, large ships, and off-road equipment. Sulfur dioxide is linked to adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function.[6]

Lead

Lead is a metal found naturally in the environment and in manufacturing products. The major sources of lead emissions historically have been mobile and industrial sources. However, as a result of the U.S. EPA's regulatory efforts to remove lead from gasoline, atmospheric lead concentrations have declined substantially over the past several decades. Lead emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries as a result of national emissions standards for hazardous air pollutants. As a result of phasing out leaded gasoline, metal processing currently is the primary source of lead emissions. The highest level of lead in the air is found generally near lead smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of lead include behavioral and hearing disabilities in children and nervous system impairment.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TAC) are airborne substances that form a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the

[6] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants

diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs.[7] TACs are different than criteria pollutants, because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to toxic air pollutants at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems.[8]

Diesel Particulate Matter

Diesel engine fuel combustion forms an important fraction of the particulate matter emission inventory, as particulates in diesel emissions are very small and readily respirable. The particles have hundreds of chemicals adsorbed onto their surfaces, including many known or suspected mutagens and carcinogens. The Office of Environmental Health Hazard Assessment (OEHHA) reviewed and evaluated the potential for diesel exhaust to affect human health and the associated scientific uncertainties. Based on the available scientific evidence, it was determined that a level of DPM exposure has not been identified below which no carcinogenic effects are anticipated.

The Scientific Review Panel that approved the OEHHA report determined that, based on studies to date, 3×10^{-4} micrograms per cubic meter ($\mu g/m^3$) is a reasonable estimate of the unit risk for DPM. This means that a person exposed to a DPM concentration of 1 $\mu g/m^3$ continuously over the course of a lifetime has a three per 10,000 chance (or 300 in one million chance) of contracting cancer due to this exposure. In 2000, the Statewide estimated average concentration of DPM was 1.26 $\mu g/m^3$ for indoor and outdoor ambient air. If DPM concentrations remained the same, about 380 excess cancers per one million population could be expected.[9] Therefore, CARB has determined that these particulate emissions are a TAC.

DPM emissions are estimated to be responsible for about 70 percent of the total ambient Statewide air toxics risk. DPM can also be responsible for elevated localized or near-source exposures ("hot-spots"). Depending on the activity and nearness to receptors, these potential risks are as high as 1,500 per million or more.[10] CARB staff have conducted risk characterization scenarios to determine the potential excess cancer risks involved when individuals are near various sources of diesel engine emissions, ranging from school buses to high-volume freeways. The purpose of the risk characterization was to estimate, through air dispersion modeling, the cancer risk associated with typical diesel-fueled engine or vehicle activities based on modeled particulate matter concentration at the point of maximum impact. The study included various sources of DPM emissions, including idling school buses, truck stops, low- and high-volume freeways, and other sources. High-volume freeways (20,000 or more trucks per day) were estimated to cause 800-1,700 per million potential

[7] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants
[8] Ibid.
[9] California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Available at https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf
[10] Ibid.

excess cases of cancers, while low-volume freeways (2,000 or fewer trucks per day) were estimated to cause about 100-200 per million potential excess cases of cancers Statewide.[11]

Asbestos

Asbestos is another TAC regulated by the SJVAPCD. Asbestos is a mineral fiber found naturally in the environment and is used in a variety of building construction materials for insulation and fire retardant. The major sources of asbestos in construction materials include roofing shingles, ceiling and floor tiles, paper products, asbestos cement products, textured paint and patching compounds, and walls and ceilings around wood-burning stoves.[12] Asbestos fibers can be released into the air during demolition, building, or maintenance/repair when asbestos-containing materials (ACM) are disturbed. Asbestos exposure has a long-term impact of developing lung diseases including lung cancer, mesothelioma, and asbestosis.[13]

Dust-Related Concerns

Valley Fever

Valley Fever or coccidioidomycosis is caused locally by the microscopic fungus *Coccidioides immitis (C. immitis)*. The *Coccidioides* fungus resides in the soil in southwestern United States, northern Mexico, and parts of Central and South America. Fresno County lies in the endemic area for Valley Fever with approximately 403 cases reported in the County in 2021.[14] Infection occurs when the spores of the fungus become airborne and are inhaled. The fungal spores become airborne when contaminated soil is disturbed by human activities, such as construction and agricultural activities, and natural phenomena, such as windstorms, dust storms, and earthquakes. About 60 percent of infected persons have no symptoms. The remainder develop flu-like symptoms that can last for a month and tiredness that can sometimes last for longer than a few weeks. A small percentage of infected persons (less than one percent) can develop disseminated disease that spreads outside the lungs to the brain, bone, and skin. Without proper treatment, Valley Fever can lead to severe pneumonia, meningitis, and even death. Symptoms may appear between one to four weeks after exposure.[15]

Diagnosis of Valley Fever is conducted through a sample of blood, other body fluid, or biopsy of affected tissue. Valley Fever is treatable with antifungal medicines and is not contagious. Once recovered from the disease, the individual is protected against further infection. Persons at highest risk from exposure are those with compromised immune systems, such as those with human immunodeficiency virus and those with chronic pulmonary disease. Farmers, construction workers, and others who engage in activities that disturb the soil are at highest risk for Valley Fever. Infants, pregnant women, diabetics, the elderly, and people of African, Asian, Latino, or Filipino descent may be at increased risk for disseminated disease. Historically, people at risk for infection are individuals

[11] California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Accessible at: https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf
[12] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants
[13] United States Environmental Protection Agency (USEPA). 2022. Learn About Asbestos. Accessible at: https://www.epa.gov/asbestos/learn-about-asbestos
[14] California Department of Public Health. 2022. Coccidioidomycosis in California Provisional Monthly Report January-December 2022. December. Accessible at: https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/CocciinCAProvisionalMonthlyReport.pdf
[15] Los Angeles County Health Department. 2013. Preventing Work-Related Coccidioidomycosis (Valley Fever). Accessible at: http://publichealth.lacounty.gov/acd/docs/ValleyFeverPreventionforWorkFlyer.pdf

not already immune to the disease and whose jobs involve extensive contact with soil dust, such as construction or agricultural workers and archeologists.

Naturally Occurring Asbestos

Naturally occurring asbestos is the name for several types of naturally occurring fibrous minerals found in serpentine rock, and its parent material, ultramafic rock. Exposure to asbestos fibers can result in health issues such as lung cancer, mesothelioma (a rare cancer of the thin membranes lining the lungs, chest, and abdominal cavity), and asbestosis (a non-cancerous lung disease which causes scarring of the lungs). Exposure to naturally occurring asbestos can occur during soil-disturbing activities in areas with deposits present. Serpentinite and/or ultramafic rock are known to be present in 44 of California's 58 counties. These rocks are particularly abundant in the counties associated with the Klamath Mountains, the Sierra Nevada foothills, and Coast Ranges. Based on information provided by the Department of Conservation (DOC) Division of Mines and Geology, naturally occurring asbestos is likely to be present within Fresno County.[16]

c. Existing Ambient Air Quality

CARB and the U.S. EPA established ambient air quality standards for major pollutants, including ozone, CO, NO_2, SO_2, Pb, and PM_{10} and $PM_{2.5}$. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO. The local Air Pollution Control Districts are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The City is located within the SJVAB under the jurisdiction of the SJVAPCD. As the local air quality management agency, the SJVAPCD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The closest air quality monitoring station to Clovis is the Clovis-North Villa Avenue station, which monitors ozone, PM_{10}, $PM_{2.5}$, and nitrogen dioxide. The SJVAPCD does not monitor sulfur dioxide, lead, and carbon monoxide. Therefore, data is not available for these pollutants. Table 4.2-1 indicates the number of days that each of the air quality standards have been exceeded at the stations during the monitoring period from 2021 to 2023. Levels of 1-hour ozone exceeded State thresholds nine times in 2021 and three times in both 2022 and 2023. Levels of 8-hour ozone exceeded State thresholds 37 times in 2021, 26 times in 2022, and 23 times in 2023; and federal thresholds 34 times in 2021, 23 times in 2022, and 21 times in 2023. PM_{10} exceeded State thresholds 111 times in 2021, 73 times in 2022, and 44 times in 2023. $PM_{2.5}$ exceeded federal thresholds 22 times in 2021 and four times in 2022. No other thresholds were exceeded in the years 2021 through 2023.

[16] California Department of Conservation (DOC). 2000. A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos. August. https://ww2.arb.ca.gov/sites/default/files/classic//toxics/asbestos/ofr_2000-019.pdf

Table 4.2-1 Annual Air Quality Data at the Fresno-Garland Air Monitoring Station

Pollutant	2021	2022	2023
Ozone (ppm), Worst 1-Hour	0.123	0.109	0.102
Number of days above CAAQS (>0.09 ppm)	9	3	3
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average	0.100	0.084	0.084
Number of days above CAAQS (>0.070 ppm)	37	26	23
Number of days above NAAQS (>0.070 ppm)	34	23	21
Nitrogen Dioxide (ppm), Worst 1-Hour	49.4	51.8	47.9
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Particulate Matter <10 microns (μg/m^3), Worst 24 Hours	208.8	127.0	104.7
Number of days above CAAQS (>50 μg/m^3)	111	73	44
Number of days above NAAQS (>150 μg/m^3)	0	0	0
Particulate Matter <2.5 microns (μg/m^3), Worst 24 Hours	104.6	41.9	34.7
Number of days above NAAQS (>35 μg/m^3)	22	4	0

ppm = parts per million; μg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

Source: CARB 2025a

Sensitive Receptors

Some receptors are considered more sensitive than others to air pollutants. The reasons for greater-than-average sensitivity include pre-existing health problems, proximity to emissions sources, or duration of exposure to air pollutants. Schools, hospitals, and convalescent homes are relatively sensitive to poor air quality, because children, elderly people, and the infirmed are more susceptible to respiratory distress and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality, because people usually stay home for extended periods of time, which results in greater associated exposure to ambient air quality and potential pollutants. In addition, recreational uses are considered sensitive due to the greater exposure to ambient air pollutants because vigorous exercise associated with recreation places a high demand on the human respiratory system. The SJVAPCD considers hospitals, schools, parks, playgrounds, daycare centers, nursing homes, convalescent facilities, and residential areas as sensitive receptors.[17] The project area includes 20 Infill Rezone Program sites in the City. Therefore, sensitive receptor locations are considered to be any hospitals, schools, parks, and other recognized sensitive receptor groups that are located in the city. Sensitive receptors are therefore located throughout the project area.

4.2.2 Regulatory Setting

The following section discusses the federal, State, and local agencies and regulations pertinent to air quality in the Fresno County area.

[17] SJVAPCD. 2015. Guide for Assessing and Mitigating Air Quality Impacts, March 19, 2015. Accessible at: https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF

a. Federal and State Regulations

Regulation of air pollution is achieved through both national and State ambient air quality standards and emission limits for individual sources of air pollutants. The CAA was enacted in 1970 and amended in 1977 and 1990 [42 United States Code (USC) 7401] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA [42 USC 7409], the U.S. EPA developed primary and secondary NAAQS. NAAQS have been designated for the following criteria pollutants of primary concern: ozone, carbon monoxide, carbon monoxide, sulfur dioxide, PM_{10}, $PM_{2.5}$, and lead. The primary NAAQS "in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health" and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The U.S. EPA classifies specific geographic areas as either "attainment" or "non-attainment" areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. The SIP is a collection of documents that set forth the State's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law.

The California Clean Air Act (CCAA) (California Health and Safety Code Section 39000 et seq.) was enacted in 1988. Under the CCAA the State has developed the CAAQS, which are generally more stringent than the NAAQS. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either "attainment" or "non-attainment" areas for each pollutant, based on the comparison of measured data in the CAAQS.

Table 4.2-2 lists the current federal and State standards for regulated pollutants and the SJVAB's attainment status for each standard. As shown therein, the SJVAB is currently classified as nonattainment for the federal and State ozone standards, the State and federal $PM_{2.5}$ standards, and the State 24-hour PM_{10} standards. The SJVAB is unclassified or classified as attainment for all other NAAQS and CAAQS.

Table 4.2-2 Federal and State Ambient Air Quality Standards

		State Standard		Federal Standard	
Pollutant	**Averaging Time**	**Concentration**	**Attainment Status**	**Concentration**	**Attainment Status**
Ozone	8-Hour	0.070 ppm	Nonattainment	0.070 ppm	Nonattainment/ Extreme
	1-Hour	0.090 ppm	Nonattainment/ Severe	–	Revoked
Carbon Monoxide	1-Hour	9.0 ppm	Attainment/ Unclassified	9.0 ppm	Attainment/ Unclassified
	8-Hour	20 ppm		35 ppm	
Nitrogen Dioxide	1-Hour	0.180 ppm	Attainment	0.100 ppm	Attainment/ Unclassified
	Annual	0.030 ppm		0.053 ppm	

Pollutant	Averaging Time	State Standard		Federal Standard	
		Concentration	Attainment Status	Concentration	Attainment Status
Sulfur Dioxide	1-Hour	0.25 ppm	Attainment	0.075 ppm	Attainment/ Unclassified
	3-Hour	–		0.5 ppm*	
	24-Hour	0.04 ppm		0.14 ppm	
	Annual	–		0.03 ppm	
Respirable Particulate Matter (PM_{10})	24-Hour	50 μg/m³	Nonattainment	150 μg/m³	Attainment
	Annual	20 μg/m³		–	
Fine Particulate Matter ($PM_{2.5}$)	24-Hour	–	Nonattainment	35 μg/m³	Nonattainment
	Annual	12 μg/m³		12 μg/m³	
Hydrogen Sulfide	1-Hour	0.03 ppm	Unclassified	No Federal Standard	No Federal Standard
Sulfates	24-Hour	25 μg/m³	Attainment	No Federal Standard	No Federal Standard
Vinyl Chloride	24-Hour	0.010 ppm	Attainment	No Federal Standard	No Federal Standard
Visibility Reducing Particles	8-Hour	[1]	[1]	No Federal Standard	No Federal Standard
Lead	30-Day	1.5 μg/m³	Attainment	–	No Designation/ Classification
	Quarterly	–		1.5 μg/m³	

ppm = parts per million; μg/m³ = micrograms per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less

[1]In 1989, CARB converted both the general Statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the Statewide and Lake Tahoe Air Basin standards, respectively.

Source: SJVAPCD 2025

The NAAQS are defined as the maximum acceptable concentration that may be reached but not exceeded more than once per year. If ambient air quality concentrations of the pollutants of concern are below the NAAQS and CAAQS standards, then health impacts are not anticipated. However, when concentrations of the air pollutants exceed the NAAQS and CAAQS standards, the health impacts are considered to vary based on the level of exceedance. The U.S. EPA has established the Air Quality Index to characterize health impacts based on the ambient air concentrations of a given pollutant.[18]

b. Regional Regulations

San Joaquin Valley Air Pollution Control District

The project is located in the jurisdiction of the SJVAPCD, which regulates air pollutant emissions for all sources throughout the SJVAB other than motor vehicles. The SJVAPCD enforces regulations and administers permits governing stationary sources. The following regional rules and regulations would apply to development under the proposed project.

[18] United States Environmental Protection Agency (USEPA). 2021. Criteria Air Pollutants. Accessible at: https://www.epa.gov/criteria-air-pollutants

- **Regulation VIII (Fugitive PM_{10} Prohibitions)** contains rules developed pursuant to U.S. EPA guidance for "serious" PM_{10} nonattainment areas. Rules included under this regulation limit fugitive PM_{10} emissions from the following sources: construction, demolition, excavation, extraction and other earth moving activities, bulk materials handling, carryout and track-out, open areas, paved and unpaved roads, unpaved vehicle/equipment traffic areas, and agricultural sources. The rule contains control measures that future project applications would be required to implement during project construction activities pursuant to *Rule 8021 Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities.*
- **Rule 4002 (Asbestos Requirements)** requires any renovation or demolition of a regulated facility to conduct a thorough inspection of the facility and proper abatement of asbestos as necessary. The rule also requires a noticing period and a general prohibition on demolition until asbestos containing material has been abated and removed from the location and requires that abatement be conducted by persons with specific asbestos certifications (primarily Asbestos Hazard Emergency Response Act [AHERA] certification).
- **Rule 4101 (Visibility)** limits the visible plume from any source to 20 percent opacity.
- **Rule 4102 (Nuisance)** prohibits the discharge of air contaminants or other materials in quantities that may cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such person or the public.
- **Rule 4601 (Architectural Coatings)** limits VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.
- **Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations)** limits VOC emissions by restricting the application and manufacturing of certain types of asphalt for paving and maintenance operations and applies to the manufacture and use of cutback asphalt, slow cure asphalt and emulsified asphalt for paving and maintenance operations.
- **Rule 8021 (Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities)** limits fugitive dust emissions from earthmoving activities and travel on access roads to and from the site. Measures required by Rule 8021 are listed in Table 4.2-3.
- **Rule 9510 (Indirect Source Review)** requires certain development projects to mitigate exhaust emissions from construction equipment greater than 50 horsepower to 20 percent below Statewide average NO_X emissions and 45 percent below Statewide average PM_{10} exhaust emissions. This rule also requires applicants to reduce baseline emissions of NO_X and PM_{10} emissions associated from operations by 33.3 percent and 50 percent respectively over a period of 10 years.

A developer can also reduce the project's impact on air quality by entering into a "Voluntary Emission Reduction Agreement" (VERA) with the SJVAPCD to address mitigation requirements under CEQA. Under a VERA, the developer may fully mitigate project emission impacts by providing funds to the SJVAPCD, which then are used by the SJVAPCD to administer emission reduction projects on behalf of the project developer.[19]

[19] SJVAPCD. 2015. Guide for Assessing and Mitigating Air Quality Impacts, March 19, 2015. Accessible at: https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF

Table 4.2-3 SJVAPCD Rule 8021 Measures

No.	Measure
A.1	Pre-water site sufficient to limit VDE to 20 percent opacity.
A.2	Phase work to reduce the amount of disturbed surface area at any one time.
B.1	Apply water or chemical/organic stabilizers/suppressants sufficient to limit VDE to 20 percent opacity; or
B.2	Construct and maintain wind barriers sufficient to limit VDE to 20 percent opacity. If using wind barriers, control measure B1 above shall also be implemented.
B.3	Apply water or chemical/organic stabilizers/suppressants to unpaved haul/access roads and unpaved vehicle/equipment traffic areas sufficient to limit VDE to 20 percent opacity and meet the conditions of a stabilized unpaved road surface.
C.1	Restrict vehicular access to the area.
C.2	Apply water or chemical/organic stabilizers/suppressants, sufficient to comply with the conditions of a stabilized surface. If an area having 0.5 acre or more of disturbed surface area remains unused for 7 or more days, the area must comply with the conditions for a stabilized surface area as defined in section 3.58 of Rule 8011.
5.3.1	An owner/operator shall limit the speed of vehicles traveling on uncontrolled unpaved access/haul roads within construction sites to a maximum of 15 miles per hour.
5.3.2	An owner/operator shall post speed limit signs that meet State and federal Department of Transportation standards at each construction site's uncontrolled unpaved access/haul road entrance. At a minimum, speed limit signs shall also be posted at least every 500 feet and shall be readable in both directions of travel along uncontrolled unpaved access/haul roads.
5.4.1	Cease outdoor construction, excavation, extraction, and other earthmoving activities that disturb the soil whenever VDE exceeds 20 percent opacity. Indoor activities such as electrical, plumbing, dry wall installation, painting, and any other activity that does not cause any disturbances to the soil are not subject to this requirement.
5.4.2	Continue operation of water trucks/devices when outdoor construction excavation, extraction, and other earthmoving activities cease, unless unsafe to do so.
6.3.1	An owner/operator shall submit a Dust Control Plan to the APCO prior to the start of any construction activity on any site that will include 10 acres or more of disturbed surface area for residential developments, or 5 acres or more of disturbed surface area for non-residential development, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials on at least 3 days. Construction activities shall not commence until the APCO has approved or conditionally approved the Dust Control Plan. An owner/operator shall provide written notification to the APCO within 10 days prior to the commencement of earthmoving activities via fax or mail. The requirement to submit a dust control plan shall apply to all such activities conducted for residential and non-residential (e.g., commercial, industrial, or institutional) purposes or conducted by any governmental entity.
6.3.3	The Dust Control Plan shall describe all fugitive dust control measures to be implemented before, during, and after any dust generating activity.
6.3.4	A Dust Control Plan shall contain all the [administrative] information described in Section 6.3.6 of this rule. The APCO shall approve, disapprove, or conditionally approve the Dust Control Plan within 30 days of plan submittal. A Dust Control Plan is deemed automatically approved if, after 30 days following receipt by the District, the District does not provide any comments to the owner/operator regarding the Dust Control Plan.

VDE = visible dust emissions; APCO = Air Pollution Control Officer; SJVAPCD = San Joaquin Valley Air Pollution Control District

Source: San Joaquin Valley Air Pollution Control District 2004

Air Quality Management Plans

As required by the federal CAA and the CCAA, air basins or portions thereof have been classified as either "attainment" or "nonattainment" for each criteria air pollutant, based on if the standards have been achieved. Jurisdictions of nonattainment areas also are required to prepare an air quality management plan that includes strategies for achieving attainment. The SJVAPCD has approved management plans demonstrating how the SJVAB would reach attainment with the federal one-hour and eight-hour ozone and $PM_{2.5}$ standards.

OZONE ATTAINMENT PLANS

The SJVAPCD's ozone attainment plans set forth measures and emission reduction strategies designed to achieve attainment with ozone one-hour and eight-hour standards. The SJVAPCD adopted the *2020 Reasonably Available Control Technology Demonstration for the 2015 8-Hour Ozone Standard* in June 2020. This plan satisfies CAA requirements and ensures expeditious attainment of the 70 parts per billion eight-hour standard.[20]

The SJVAPCD adopted the *2022 Plan for the 2015 8-Hour Ozone Standard* on December 15, 2022. This plan uses extensive science and research, state of the art air quality modeling, and the best available information in developing a strategy to attain the federal 2015 NAAQS for ozone of 70 parts per billion (ppb) as expeditiously as practicable. Building on decades of developing and implementing effective air pollution control strategies, this plan demonstrates that the reductions being achieved by the SJVAPCD and CARB strategy (72 percent reduction in NO_X emissions by 2037) ensures expeditious attainment of the 2015 8-hour ozone standard by the 2037 attainment deadline.[21]

The SJVAPCD adopted the *2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard* on June 15, 2023. This maintenance plan demonstrates SJVAPCD's consistency with all five criteria of Section 107(d)(3)(E) of the CAA to terminate all anti-backsliding provisions for the revoked 1-hour ozone standard, including Section 185 nonattainment fees. This Maintenance Plan also includes a demonstration that would ensure the area remains in attainment of the 1-hour ozone NAAQS through 2036. Therefore, the SJVAPCD is requesting to be redesignated to attainment for the 1-hour ozone NAAQS and requesting termination of all anti-backsliding obligations.[22]

As required by the federal and California CAAs, the SJVAB or portions thereof have been classified as either "attainment" or "nonattainment" for each criteria air pollutant, based on whether or not the standards have been achieved. Jurisdictions of nonattainment areas also are required to prepare an air quality management plan (AQMP) that includes strategies for achieving attainment. The SJVAPCD has approved an AQMPs demonstrating how the SJVAB will reach attainment with the federal and State ozone, PM_{10}, and $PM_{2.5}$ standards.

[20] SJVAPCD. 2020. 2020 Reasonably Available Control Technology (RACT) Demonstration for the 2015 8-Hour Ozone Standard. Adopted June 18, 2020. Accessible at: https://ww2.valleyair.org/media/3xrdxpvl/2020-ract-demonstration.pdf
[21] SJVAPCD. 2022. 2022 Plan for the 2015 8-Hour Ozone Standard. Adopted December 15, 2022. Accessible at: https://ww2.valleyair.org/media/0zdlenk3/04-proposed-2022-plan-for-the-2015-8-hour-ozone-standard.pdf
[22] SJVAPCD. 2023. 2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard. Adopted June 15, 2023. Accessible at: https://ww2.valleyair.org/media/itoegkch/03-adopted-2023-maintenance-plan-and-redesignation-request-for-the-revoked-1-hour-ozone-standard.pdf

PARTICULATE MATTER ATTAINMENT PLANS

The SJVAPCD adopted the 2024 $PM_{2.5}$ Plan in June 2024 to fulfill CAA requirements mandated under the EPA 2012 particulate annual standards and to demonstrate attainment of the 2012 $PM_{2.5}$ standard by 2030 (SJVAPCD 2024). The 2024 $PM_{2.5}$ Plan includes a control strategy to reduce $PM_{2.5}$ emissions by 10.8 tons per day and NO_x by 148.7 tons per day between 2017 and 2030, through the implementation of adopted SJVAPCD and CARB regulations, in addition to reductions to be achieved through new regulatory and incentive-based commitments for stationary, area, and mobile sources.

c. Local Regulations

City of Clovis General Plan

The City General Plan Air Quality Element includes the following applicable goals and policies related to air quality:

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

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

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

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

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

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

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

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

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

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This analysis uses the guidance and methodologies recommended in the SJVAPCD's 2015 *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI) to determine whether air quality impacts resulting from the proposed project would have a significant impact.

Construction

Construction-related emissions are temporary but may still cause adverse air quality impacts. Construction of development associated with the project would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances. At this time, there is not sufficient detail to allow project-level analysis and thus it would be speculative to analyze project-level impacts. Rather, construction impacts for the project are discussed qualitatively and emissions are not compared to project-level thresholds.

Operational

The methodology for determining the significance of air quality impacts consists of quantifying operational emissions from development facilitated by the proposed project, then comparing emissions estimates to applicable thresholds, as described above. Criteria pollutant emissions for project operation were calculated using the California Emissions Estimator Model (CalEEMod), Version 2022.1. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions associated with both construction and operations from a variety of land use projects. The model was developed for the California Air Pollution Control Officers Association (CAPCOA) in collaboration with the California air districts. CalEEMod allows for the use of default data (e.g., emission factors, trip lengths, meteorology, source inventory) provided by the various California air districts to account for local requirements and conditions, and/or user-defined inputs. Specifically, CalEEMod incorporates SJVAPCD Rule 4601, which establishes restrictions on ROG content in architectural coatings, and the latest approved Emission Factor (EMFAC) model. The input data and subsequent operation emission estimates for the proposed project are discussed below. CalEEMod output files are included in Appendix A and Appendix B. The SJVAPCD's Regulation VIII, *Fugitive PM_{10} Prohibition* was also incorporated into the modeling.

Operational emissions associated with buildout of the proposed project were modeled in CalEEMod. Although the proposed project would facilitate the development of 1,303 residential units, as a conservative estimate, project emissions represent the maximum potential increase in the number of residential units by 1,651 units as described in Table 2-2 in Chapter 2, *Project Description*.

In CalEEMod, operational sources of criteria pollutant emissions include area, energy, and mobile sources. Area emissions were based on CalEEMod defaults for each land use type. Modeling for electricity, water, and wastewater use were based on CalEEMod defaults. Mobile source emissions consist of emissions generated by vehicles to and from the Infill Rezone Program sites proposed

under the proposed project. Residential vehicle miles traveled (VMT) was derived from the Transportation Impact Analysis prepared by Kittelson and used to estimate mobile source emissions.

Significance Thresholds

Based on Appendix G of the *CEQA Guidelines*, the proposed project would have a significant impact on air quality if it would:

1. Conflict with or obstruct the implementation of the applicable air quality plan
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard
3. Expose sensitive receptors to substantial pollutant concentrations
4. Result in other emissions (such as those leading to odors adversely affecting a substantial number of people)

The SJVAPCD's 2015 GAMAQI does not provide guidance applicable to plans. However, the SJVAPCD's GAMAQI includes significance criteria for evaluating construction and operational emissions associated with individual projects. The SJVAPCD recommends the use of quantitative thresholds to determine if a project would significantly contribute to a nonattainment designation for criteria pollutants based on project emissions. Therefore, this analysis conservatively applies the thresholds shown in Table 4.2-4 to land use developments facilitated by the proposed project for operational emissions.

Table 4.2-4 SJVAPCD Air Quality Significance Thresholds

Pollutant	NO_X	ROG	PM_{10}	$PM_{2.5}$	SO_X	CO
Thresholds (tons per year)	10	10	15	15	27	100

NO_X= nitrogen oxides; ROG = reactive organic gases; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; SO_x = sulfur oxides; CO = carbon monoxide; SJVAPCD = San Joaquin Valley Air Pollution Control District

Source: San Joaquin Valley Air Pollution Control District 2015

In addition to the annual thresholds outlined above for regional compliance, the SJVAPCD has published the *Ambient Air Quality Analysis Project Daily Emissions Assessment* guidance, which is summarized in Section 8.4.2, *Ambient Air Quality Screening Tools*, of the SJVAPCD's GAMAQI, adopted in March 2015. The Ambient Air Quality Analysis (AAQA) prepared by the SJVAPCD determined if localized emissions of criteria pollutants will exceed the NAAQS or CAAQS and therefore result in significant localized impacts. The *Ambient Air Quality Screening Tools* guidance provides a screening threshold of 100 pounds (lbs) per day for NO_X, ROG, PM_{10}, $PM_{2.5}$, sulfur oxides, and carbon monoxide to inform localized significance impacts. The SJVAPCD recommends an AAQA be performed for all criteria pollutants when emissions of any criteria pollutant resulting from project activities exceed the 100 lbs per day screening level, after compliance with Rule 9510 requirements and implementation of all enforceable mitigation measures. For any analysis that results in a pollutant that exceeds this screening threshold, an AAQA should be conducted following District Rule 2201 *AAQA Modeling*. An AAQA uses air dispersion modeling to determine if emission increases from a project's construction or operational activities would, in combination with background concentrations, cause or contribute to a violation of the ambient air quality. If modeled concentrations combined with background concentrations would result in an exceedance of a NAAQS or CAAQS, then District Rule 2201 requires that the maximum modeled concentration of each

pollutant be compared to its corresponding Significant Impact Level (SIL). A SIL is a concentration threshold used to determine whether a proposed source's emissions will have a significant impact on air quality in an area regardless of NAAQS or CAAQS exceedances. If modeled concentrations do not exceed the SIL, then the project would not result in a violation of ambient air quality standards.[23] Because this EA is a programmatic document, an accurate AAQA analysis beyond the screening level analysis is not feasible. Therefore, for the purposes of the analysis, the 100 lbs per day screening level is used to determine if there would be an air quality impact for operational emissions.

At this time, reasonably foreseeable development facilitated by the proposed project do not yet have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level construction analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts for comparison with SJVAPCD's project-level significance thresholds outlined under *Significance Thresholds*. Therefore, a more qualitative approach to characterizing construction air quality impacts has been employed for this analysis.

Sierra Club v. County of Fresno (2018) 6 Cal 5th 502

A 2018 Supreme Court of California decision, Sierra Club v. County of Fresno, held that an EIR must reflect "a reasonable effort to discuss relevant specifics regarding the connection between" and the estimated amount of a given pollutant the project will produce and the health impacts associated with that pollutant. Further, the EIR must show a "reasonable effort to put into a meaningful context" the conclusion that the project will cause a significant air quality impact. Although CEQA does not mandate an in-depth health risk assessment, CEQA does require an EIR to adequately explain either (a) how "bare [emissions] numbers" translate to or create potential adverse health impacts; or (b) what the agency does know, and why, given existing scientific constraints, it cannot translate potential health impacts further.

As noted in the Brief of Amicus Curiae by the South Coast Air Quality Management District (SCAQMD) in the Sierra Club v. County of Fresno case, the SCAQMD – which has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State – indicated that quantifying specific health risks that may result from ozone precursors and other air pollutants from individual development projects (like those that would result from the proposed project) would be unreliable and misleading due to the relatively small-scale of these individual projects (from a regional perspective), unknown variables related to pollutant generation/release and receptor exposure, and regional model limitations. Accordingly, current scientific, technological, and modeling limitations prevent accurate and quantifiable relation of the proposed project's VOC emissions (and other air pollutant emissions) to likely health consequences for local and regional receptors.

[23] SIL's are available in SJVAPCD's APR 1235 Policy for District Rule 2201 AAQA Modeling guidance document.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the proposed project conflict with or obstruct the implementation of the regional air quality management plan?

Impact AQ-1 CONSTRUCTION ALLOWED BY THE PROPOSED PROJECT WOULD CONFLICT WITH IMPLEMENTATION OF THE 2022 OZONE PLAN AND 2024 $PM_{2.5}$ PLAN EVEN WITH IMPLEMENTATION OF THE CITY'S GENERAL PLAN (GP) EIR MITIGATION MEASURE (MM) 3-1. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Development facilitated by the proposed project would result in emissions of criteria pollutants including ozone precursors, such as ROG and NO_X, as well as particulate matter. The SJVAPCD has prepared several air quality attainment plans to achieve ozone and particulate matter standards, the most recent of which include the *2022 Reasonably Available Control Technology (RACT) Demonstration for the 2015 8-Hour Ozone Standard, 2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard,* and *2024 Plan for the 2012 $PM_{2.5}$ Standard*. The SJVAB is in attainment for carbon monoxide, sulfur dioxide, and lead, and there are no attainment plans for those pollutants.

Per the *GAMAQI*, the SJVAPCD has determined that projects with emissions above the thresholds of significance for criteria pollutants would conflict with/obstruct implementation of the SJVAPCD's air quality plan (SJVAPCD 2015). As discussed under Impact AQ-2, project construction would potentially exceed the thresholds of significance for criteria pollutants.

Future development facilitated by the proposed project would be required to comply with Policy 1.1 of the City's General Plan Air Quality Element, which encourages transit-oriented development; Policy 1.2, which prohibits the siting of sensitive land uses within distances of emission sources defined by CARB; Policy 1.3, which encourages the use of the SJVAPCD construction best management practices (BMPs); Policy 1.6, which encourages incorporation of electric charging and alternative fuel stations; and Policy 1.8, which encourages the maintenance or planting of trees.

As discussed in the 2022 Ozone Plan and the 2024 $PM_{2.5}$ Plan, the SJVAPCD adopted rules (shown in Table 4.2-5 as part of its control strategy to reduce NO_x, VOC, PM_{10}, and $PM_{2.5}$ emissions).

Table 4.2-5 SJVAPCD Rules

District Rule Number	District Rule
Adopted Regulations	
4103	Improved Public Transit
4308	Boilers, Steam Generators, and Process Heaters 0.075 to <2 MMBtu/hr
4311	Flares
4306/4320	Boilers, Steam Generators, and Process Heaters >5 MMBtu/hr
4352	Solid Fuel Fired Boilers, Steam Generators and Process Heaters
4354	Glass Melting Furnaces
4601	Architectural Coatings
4702	Internal Combustion Engines
4901	Wood Burning Fireplaces and Wood Burning Heaters
4902	Residential Water Heaters
1905	Natural Gas-Fired, Fan-Type Residential Central Furnaces
9410	Employer Based Trip Reduction
9510	Indirect Source Review
9610	State Implementation Plan Credit for Emission Reductions Generated Through Incentive Programs
New Regulatory and Incentive-Based Commitments	
4550	Conservation Management Practices
4901	Residential Wood Burning
–	Fireplace and Woodstove Change-Out Program
–	Low-Dust Nut Harvester Replacement Program

Source: SJVAPCD 2022

The proposed project would be consistent with the 2022 Ozone Plan and 2024 $PM_{2.5}$ Plan and would be required to comply with the applicable SJVAPCD rules. Specifically, individual projects under the proposed project would be required to comply with Rule 4601, which limits VOC emissions from architectural coatings; Rule 4901, which enforces stringent curtailment requirements for wood burning fireplaces and heaters during wood-burning season; Rule 4902, which enforces NO_X emissions for natural gas-fired residential water heaters; and Rule 9510, which encourages incorporation of clean air design to individual projects to reduce NO_X and PM_{10} emissions during construction and operation.

As shown under Impact AQ-2, development facilitated by the proposed project is anticipated to exceed the project-level construction significance thresholds established by the SJVAPCD. Implementation of SJVAPCD rules would not be sufficient to demonstrate consistency with the 2022 Ozone Plan and 2024 $PM_{2.5}$ Plan as an exceedance of project-level significance thresholds reflects inconsistency with the plans because the thresholds were designed to reach attainment in the SJVAB. Therefore, because emissions from development facilitated by the proposed project would potentially exceed SJVAPCD project-level thresholds, the proposed project would not be consistent SJVAPCD's air quality plans. Future discretionary development projects under the proposed project shall implement GP EIR MM 3-1. Implementation of this measure would reduce emissions of NO_x and particulate matter from development facilitated by the proposed project. However, it is unknown at this time if such mitigation would be sufficient to reduce ozone precursor and

particulate matter emissions to below applicable SJVAPCD thresholds. An exceedance of SJVAPCD project-level significance thresholds would conservatively reflect inconsistency with the 2022 Ozone Plan and 2024 $PM_{2.5}$ Plan. The proposed project would therefore be inconsistent with applicable air quality plans, and impacts would be significant and unavoidable. Therefore, even with implementation of this MM, impacts would be significant and unavoidable.

Mitigation Measures

GP EIR MM 3-1

Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Clovis Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SJVAPCD adopted thresholds of significance, as identified in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the City of Clovis Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions could include, but are not limited to:

- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3, Tier 4, or more stringent emission limits, applicable for engines between 50 and 750 horsepower. A list of construction equipment by type and model year shall be maintained by the construction contractor onsite, which shall be available for City review upon request.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Use of alternative-fueled or catalyst-equipped diesel construction equipment, if available and feasible.
- Clearly posted signs that require operators of trucks and construction equipment to minimize idling time (e.g., 5-minute maximum).
- Preparation and implementation of a fugitive dust control plan that may include the following measures:
    - Disturbed areas (including storage piles) that are not being actively utilized for construction purposes shall be effectively stabilized using water, chemical stabilizer/suppressant, or covered with a tarp or other suitable cover (e.g., revegetated).
    - Onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized using water or chemical stabilizer/suppressant.
    - Land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled utilizing application of water or by presoaking.
    - Material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained when materials are transported offsite.

- Operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.).
- Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.
- Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.
- Any site with 150 or more vehicle trips per day shall prevent carryout and trackout.
- Limit traffic speeds on unpaved roads to 15 mph.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than 1 percent.
- Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area.
- Adhere to Regulation VIII's 20 percent opacity limitation, as applicable.

- Enter into a Voluntary Emissions Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD). The VERA shall identify the amount of emissions to be reduced, in addition to the amount of funds to be paid by the project applicant to the SJVAPCD to implement emission reduction projects required for the project.

Significance after Mitigation

Significant and unavoidable.

Threshold 2:	Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the Plan region is nonattainment under an applicable federal or State ambient air quality standard?

Impact AQ-2 CONSTRUCTION OF THE PROPOSED PROJECT WOULD HAVE A SIGNIFICANT AND UNAVOIDABLE IMPACT ON A NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PLAN REGION IS NONATTAINMENT EVEN WITH IMPLEMENTATION OF GP EIR MM 3-1. OPERATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE PLAN REGION IS NONATTAINMENT UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD AND IMPACTS RELATED TO OPERATION WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction facilitated by the proposed project would result in temporary emissions of various air pollutants. Ozone precursors NO_X and carbon monoxide would be emitted by the operation of construction equipment, while fugitive dust (PM_{10}, and $PM_{2.5}$) would be emitted by activities that disturb the soil, such as grading and excavation, road construction, and building construction. The extent of emissions, particularly ROG and NO_X emissions, generated by construction equipment would depend on the quantity of equipment used and the hours of operation for each individual project associated with buildout of the proposed project. $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether

transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. The extent of VOC emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved each day. SJVAPCD's Regulation VIII, *Fugitive PM_{10} Prohibition*, further stipulates that property owners, contractors, developers, equipment operators, farmers, and public agencies employ fugitive dust control measures to minimize emissions from outdoor fugitive dust sources. These fugitive dust control measures are recommended for all projects.[24]

As discussed in *Methodology*, the SJVAPCD has not established plan-level significance thresholds for construction air pollutant emissions. At this time, reasonably foreseeable development facilitated by the proposed project do not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

Construction activities would occur on 20 Infill Rezone Program sites identified in Chapter 2, *Project Description*. Proposed development on the sites would be subject to compliance with applicable SJVAPCD rules described under Section 4.2.2, *Regulatory Setting*, including Regulation VIII (Fugitive PM_{10} Prohibitions), Rule 4002 (Asbestos Requirements), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations, Rule 8021 (Construction, Demolition, Excavation, and Other Earthmoving Activities), and Rule 9510 (Indirect Source Review). Compliance with these rules would reduce construction emissions of air quality criteria pollutants such as PM_{10}, VOC, fugitive dust, and NO_x. In addition, future development would be required to comply with Policy 1.3 from the City of Clovis General Plan Air Quality Element which encourages the use of SJVAPCD construction BMPs to further reduce criteria air pollutant emissions. Nonetheless, even with adherence to regional and local regulations, construction could still potentially result in a cumulatively considerable net increase in criteria pollutants from exceeding SJVAPCD thresholds and this impact would be potentially significant. Future development facilitated by the proposed project would be required to implement the City's GP EIR MM 3-1. Implementation of GP EIR MM 3-1 would reduce construction emissions, but the extent to which reductions would occur is unknown. It is speculative to determine whether project-level emissions associated with development facilitated by the proposed project would be reduced below the SJVAPCD project-level significance thresholds because the nature and intensity of future projects are not known at this time. Therefore, construction-related impacts would remain significant and unavoidable.

Operation

Emissions associated with development facilitated by the proposed project would result in operational emissions from buildout of the 20 individual Infill Rezone Program sites. In addition, the SJVAPCD has established Rule 4601, which reduces ROG emissions from architectural coating activities. Table 4.2-6 shows the growth in operational emissions associated with the proposed project. As shown, development facilitated by the proposed project would not result in emissions exceeding SJVAPCD significance thresholds for criteria pollutants.

[24] SJVAPCD. 2015. Guide for Assessing and Mitigating Air Quality Impacts, March 19, 2015. Accessible at: https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF

Table 4.2-6 Operational Emissions

Emissions Source	Estimated Emissions (tons/year)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Mobile	1	3	26	<1	11	3
Area	7	<1	8	<1	<1	<1
Energy	<1	2	1	<1	<1	<1
Total	**8**	**5**	**35**	**<1**	**11**	**3**
SJVAPCD Thresholds	*10*	*10*	*100*	*27*	*15*	*15*
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

ROG = reactive organic gases; NO_X= nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; SJVAPCD = San Joaquin Valley Air Pollution Control District

See Appendix A for summaries and CalEEMod results.

Note: Totals may not add up due to rounding.

Most of the 20 Infill Rezone Program sites are located within one mile of a bus stop, with the exception of Sites 157, 197, and 592, which are located within two miles of a bus stop. The proximity to bus stops would encourage the use of alternative transportation and reduce the use of single-occupancy vehicles and thereby VMT. In addition, development facilitated by the proposed project would be subject to Chapters 8.16 and 8.17 of the Clovis Municipal Code (CMC), which requires compliance with the City's Energy Code and the Green Building Standards Code. Adherence to local regulations and SJVAPCD rules would reduce operational-related emissions. Therefore, impacts from operational criteria pollutant emissions would be less than significant.

Mitigation Measures

Construction

Implement GP EIR MM 3-1.

Operation

No mitigation measures are required.

Significance after Mitigation

Significant and unavoidable for construction impacts, less than significant for operational impacts.

Threshold 3:	Would the proposed project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 CONSTRUCTION ALLOWED BY THE PROPOSED PROJECT COULD EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. CONSTRUCTION IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH IMPLEMENTATION OF GP EIR MMS 3-1 AND 3-2. HOWEVER, OPERATION OF THE PROPOSED PROJECT WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS WITH IMPLEMENTATION OF GP EIR MM 3-4 SO OPERATIONAL IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Ambient Air Quality Analysis

Construction

At this time, reasonably foreseeable development facilitated by the proposed project does not have sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) to allow for project-level analysis given the programmatic nature of the plan and thus it would be speculative to analyze project-level impacts. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

The SJVAB is a nonattainment area for ozone, PM_{10}, and $PM_{2.5}$ under the NAAQS and/or CAAQS. The current air quality in the Air Basin is the result of cumulative criteria pollutant emissions from motor vehicles, off-road equipment, commercial and industrial facilities, residential developments, and other emission sources. Projects that emit these pollutants or their precursors (i.e., ROG and NO_X for ozone) potentially contribute to poor air quality.

Construction activities would occur on 20 Infill Rezone Program sites identified in Chapter 2, *Project Description*. Proposed development on the sites would be subject to compliance with applicable SJVAPCD rules described under Section 4.2.2, *Regulatory Setting*, including Regulation VIII (Fugitive PM_{10} Prohibitions), Rule 4002 (Asbestos Requirements), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations, Rule 8021 (Construction, Demolition, Excavation, and Other Earthmoving Activities), and Rule 9510 (Indirect Source Review). Compliance with these rules would reduce construction emissions of air quality criteria pollutants such as PM_{10}, VOC, fugitive dust, and NO_x. In addition, future development would be required to comply with Policy 1.3 from the City General Plan Air Quality Element which encourages the use of SJVAPCD construction BMPs to further reduce criteria air pollutant emissions. Future development facilitated by the proposed project would be required to implement GP EIR MMs 3-1 and 3-2. Implementation of the MMs would reduce construction emissions, but the extent to which reductions would occur is unknown. It is speculative to determine whether project-level emissions associated with development facilitated by the proposed project would be reduced below the SJVAPCD project-level significance thresholds because the nature and intensity of future projects are not known at this time. Nonetheless, even with adherence to regional and local regulations, construction could still potentially result in a cumulatively considerable net increase in criteria pollutants from exceeding SJVAPCD thresholds. Therefore, construction-related impacts would remain significant and unavoidable, similar to the City's GP EIR. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, mitigation measures would be applied to reduce impacts to a less than significant level.

Operation

Table 4.2-7 presents the estimated emissions for Site 3, which is a conservative assessment since Site 3 includes a maximum capacity of 242 units and would therefore generate the highest localized operational emissions among the 20 Infill Rezone Program sites. As shown, operational emissions would not exceed the SJVAPCD recommended daily 100 lbs. per day screening threshold for CO. Therefore, localized operational emissions would be less than significant.

Table 4.2-7 Localized Operational Emissions

	Estimated Emissions (pounds/day)					
Emissions Source	**ROG**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Project Emissions	**11**	**5**	**36**	**<1**	**4**	**1**
SJVAPCD Thresholds	*100*	*100*	*100*	*100*	*100*	*100*
Exceeds Threshold?	**No**	**No**	**Yes**	**No**	**No**	**No**

ROG = reactive organic gases; NO_X= nitrogen oxides; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with a diameter of 10 microns or less; $PM_{2.5}$ = particulate matter with a diameter of 2.5 microns or less; SJVAPCD = San Joaquin Valley Air Pollution Control District

Notes: Emissions highest of summer and winter outputs.

See Appendix B for summaries and CalEEMod results.

Carbon Monoxide Hotspots

A carbon monoxide hotspot is a localized concentration of carbon monoxide that is above a carbon monoxide ambient air quality standard. Localized carbon monoxide hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local carbon monoxide concentration exceeds the federal 1-hour standard of 35 ppm or the federal and State 8-hour standard of 9 ppm.

The entire SJVAB is in conformance with State and federal carbon monoxide standards and no air quality monitoring stations report carbon monoxide levels in the SJVAPCD jurisdiction. Additionally, CARB no longer reports carbon monoxide concentrations anywhere in California. Based on the low background level of carbon monoxide in the project (indicated by the lack of monitoring at State or local levels) and the ever-improving vehicle emissions standards for new sources in accordance with State and federal regulations, development facilitated by the proposed project would not create new carbon monoxide hotspots. Therefore, the proposed project would not expose sensitive receptors to substantial carbon monoxide concentrations, and localized air quality impacts related to carbon monoxide hot spots would be less than significant.

Toxic Air Contaminants

Construction

Construction-related activities would result in temporary project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998.[25]

Generation of DPM from construction projects typically occurs in a single area for a short period. The dose to which the receptors are exposed is the primary factor used to determine health risk.

[25] CARB. 2025. Top 4 Summary. Accessed July 2025: https://www.arb.ca.gov/adam/topfour/topfour1.php

Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment, health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Current models and methodologies for conducting health-risk assessments are associated with longer-term exposure periods of nine, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties in producing accurate estimates of health risk.

The maximum PM_{10} and $PM_{2.5}$ emissions would occur during demolition, site preparation and grading activities. PM emissions would decrease for the remaining construction period because construction activities such as building construction and architectural coating would require less intensive construction equipment. While the maximum DPM emissions associated with demolition, site preparation, and grading activities would only occur for a portion of the overall construction period, these activities represent the worst-case condition for the total construction period.

Since the nature and intensity of future projects are not known at this time, DPM generated by project construction could potentially create conditions where the probability is greater than one in one million of contracting cancer for the Maximally Exposed Individual or generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. Therefore, this impact would be potentially significant. Future development would be required to implement GP EIR MM 3-2. Nonetheless, construction TAC impacts would remain significant and unavoidable.

Operation

CARB reports that DPM represents about 70 percent of the potential cancer risk from vehicle travel on a typical urban freeway. More than 90 percent of DPM is less than one micron in size and thus is a subset of $PM_{2.5}$; thus, diesel $PM_{2.5}$ emission levels can serve as a proxy of DPM emission levels.[26] The SJVAPCD GAMAQI set the significance threshold for long-term public health risk is at 10 excess cancer cases in a million for cancer risk. For non-cancer risk, the significance level is set at a Hazard Index of more than one (1.0). The Hazard Index of more than one means that predicted levels of a toxic pollutant are greater than the exposure level, which is generally considered acceptable. If a formal health risk assessment shows that a significant impact results, mitigation measures to reduce the predicted levels of toxic air pollutants from the facility to a level of less than significant may be required.

The population residing close to freeways or busy roadways may experience adverse health effects beyond those typically found in urban areas. CARB, in the *Air Quality and Land Use Handbook: A Community Health Perspective* (June 2005), recommends avoiding siting new sensitive land uses, such as residences, schools, daycare centers, playgrounds, or medical facilities, within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. The City's GP EIR recommends avoiding siting new sensitive land uses within 500 feet of a major stationary source or roadway with over 50,000 vehicles per day. Additional non-cancer health risk attributable

[26] CARB. 2025. Overview: Diesel Exhaust & Health. Accessed July 2025: https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

to proximity to freeways was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70 percent drop-off in particulate pollution levels at 500 feet (CARB 2005). As discussed above, proximity to freeways increases cancer risk and exposure to particulate matter. Similarly, proximity to heavily travelled transit corridors and intersections would expose residents to higher levels of DPM and carbon monoxide.

According to the California Department of Transportation (Caltrans), Clovis Avenue, Herndon Avenue, Peach Avenue, Bullard Avenue, Blackstone Avenue, Belmont Avenue, Shaw Avenue, and Fowler Avenue are urban roads with more than 50,000 vehicles/day.[27] Infill Rezone Program Site 3 is located within 500 feet of Herndon Avenue; Site 72 is located within 500 feet of Peach Avenue; Site 108 is located within 500 feet of Clovis Avenue; Sites 167, 168, and 590 are located within 500 feet of Shaw Avenue; Sites 63, 592, 598, and 599 are located within 500 feet of Fowler Avenue; and Site 589 is located within 500 feet of Bullard Avenue. Although future development facilitated by the project would be required to comply with the residential indoor air quality requirements in the Title 24 Building Energy Efficiency Standards, which currently require Minimum Efficiency Reporting Value 13 (or equivalent) filters for heating/cooling systems and ventilation systems in residences (Section 150.0[m]), development of sites within 500 feet of a roadway that has 50,000 vehicles/day or more could result in a potentially significant impact. Implementation of GP EIR MM 3-4 would be required to reduce this impact to a less than significant level.

Asbestos

Asbestos may be contained in existing buildings that may be demolished as part of the land-use scenario envisioned by the proposed project. Individual project applicants would have to demonstrate compliance with SJVAPCD Rule 4002, which requires abatement of ACM by a licensed contractor prior to the issuance of a demolition permit. The requirements to obtain a demolition permit for the structures on the project location would ensure that ACM is handled appropriately and that hazardous materials are disposed of according to federal and State regulations. Therefore, impacts to workers and off-site receptors from asbestos exposure would be less than significant.

San Joaquin Valley Fever

Construction activities that include ground disturbance can result in fugitive dust, which can cause fungus *Coccidioides* spores to become airborne if they are present in the soil. These spores can cause Valley Fever. Workers who disturb soil where fungal spores are found, whether by digging, operating earthmoving equipment, driving vehicles, or by working in dusty, wind-blown areas, are more likely to breathe in spores and become infected. It is not a contagious disease and secondary infections are rare. Project construction for future development facilitated by the proposed project would include ground-disturbing activities that could increase potential for exposure of nearby residents and on-site workers to airborne spores, if they are present. Compliance with dust control measured required by SJVAPCD Rule 8021 would minimize personnel and public exposure to Valley Fever and reduce the potential risk of nearby resident and on-site worker exposure to Valley Fever. Additionally, the 20 Infill Rezone Program sites are located adjacent to urban development where exposure risks to Valley Fever are lower due to less exposed dry soils when compared to risks associated with the development of undisturbed rural and agricultural land (Center for Disease Control 2024). As discussed under *Air Pollutant Emission Thresholds*, the SJVAPCD does not have a recommended threshold for Valley Fever Impacts but instead recommends consideration of the

[27] California Department of Transportation (Caltrans). 2023. Traffic Census Program. Accessible at: https://dot.ca.gov/programs/traffic-operations/census

following factors that may indicate a project's potential to result in significant impacts related to Valley Fever:

- Disturbance of the topsoil of undeveloped land (to a depth of about 12 inches)
- Dry, alkaline, sandy soils
- Virgin, undisturbed, non-urban areas
- Windy areas
- Archaeological resources probable or known to exist in the area (Native American midden sites)
- Special events (fairs, concerts) and motorized activities (motocross track, All Terrain Vehicle activities) on unvegetated soil (non-grass)
- Non-native population (i.e., out-of-area construction workers)

Therefore, impacts associated with Valley Fever would be less than significant.

Mitigation Measures

Construction

Implement GP EIR MM 3-1

GP EIR MM 3-2

Prior to discretionary approval, applicants for phased development projects (i.e., construction would overlap operation/opening of the project) involving residential land uses shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD) or the City of Clovis (City) in conjunction with the SJVAPCD in preparation of a health risk assessment (HRA) for construction activities. If the construction HRA identifies risk impacts that exceed the standards as determined by the SVJAPCD at the time the project is considered, it shall identify measures to reduce these impacts to below these standards. Recommended measures may include those identified in GP EIR MM 3-1. The recommendations of the construction HRA shall be incorporated into all construction management plans which shall be submitted to the City and verified by the City's Planning Division.

Operation

GP EIR MM 3-4

Prior to discretionary project approval, the City of Clovis (City) shall evaluate new development proposals for sensitive land uses (e.g., residential, schools, day care centers) within the City for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective.[28] Applicants for sensitive land uses that are within the recommended buffer distances shall submit a health risk assessment (HRA) to the City prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), the appropriate noncancer hazard index exceeds 1.0, or the thresholds established

[28] Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Accessible at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf

by the SJVAPCD at the time a project is considered, the applicant shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to the following:

- Placement of air intakes away from high-volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.
- Heating, ventilation, and air conditioning systems for units that are installed with MERV filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division.

Significance after Mitigation

Project level emissions would remain significant and unavoidable for construction.

Operational impacts would be less than significant with mitigation measures incorporated.

Threshold 4:	Would the proposed project create objectionable odors affecting a substantial number of people?

Impact AQ-4 THE PROPOSED PROJECT WOULD NOT CREATE OBJECTIONABLE ODORS THAT WOULD AFFECT A SUBSTANTIAL NUMBER OF PEOPLE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would facilitate the development of 1,303 residential units, with a maximum potential of 1,651 units, and would not site new odor sources near existing sensitive receptors or site sensitive receptors near odor sources. During construction activities, only short-term, temporary odors from vehicle exhaust and construction equipment engines would occur. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.2.4 Cumulative Impact Analysis

The cumulative context for air quality is regional. The SJVAPCD is currently classified as nonattainment for the federal and State ozone standards, the State and federal $PM_{2.5}$ standards, and the State 24-hour PM_{10} standards. Development facilitated by the project would generate particulate matter and the ozone precursors (ROG and NO_X) in the area during construction and operation.

As described under Impact AQ-1, although the proposed project would be consistent with the SJVAPCD adopted rules (shown in Table 4.2-5 as part of its control strategy to reduce NO_x, VOC, PM_{10}, and $PM_{2.5}$ emissions), project construction would potentially exceed the thresholds of significance for criteria pollutants. Therefore, the proposed project would not be consistent with the 2022 Ozone Plan and the 2024 $PM_{2.5}$ Plan and could potentially result in a cumulatively considerable contribution to a conflict with or obstruction of implementation of the applicable air quality plan.

As described under Impact AQ-2, although the proposed project would comply with applicable SJVAPCD rules and policies in the City's GP and implement GP EIR MM 3-1, construction associated with the proposed project could still increase air pollutant emissions and create localized areas of unhealthy air pollution levels or air quality nuisances. Therefore, the project would result in a cumulatively considerable net increase of a criteria pollutant from construction emissions.

As identified under Impact AQ-3, even with implementation of GP EIR MMs 3-1 and 3-2, the proposed project could still potentially expose sensitive receptors to cumulatively considerable amount of substantial pollutant concentrations during construction. Therefore, the project's contribution to cumulative air quality impacts for localized construction pollutants and construction TACs would result in a cumulatively significant impact.

As identified under Impact AQ-3, with implementation of GP EIR MM 3-4, impacts related to operational TACs would be less than significant and therefore would not result in a cumulatively significant impact.

As identified under Impact AQ-4, development facilitated by the project would not have a significant impact from odor emissions. The consideration of cumulative odor impacts is limited to cases when projects constructed simultaneously are within a few hundred yards of each other because of the short range of odor dispersion. It is unlikely that construction of housing sites would occur within a few hundred yards of major off-site construction. Therefore, development facilitated by the project would not result in a cumulatively considerable odor impact.

Mitigation Measures

Implement mitigation measures GP EIR MM 3-1, 3-2, 3-4.

Significance after Mitigation

Operational impacts would be less than significant with mitigation measures incorporated. Project level impacts related to construction would be significant and unavoidable with mitigation measures incorporated.

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4.3 Biological Resources

This section evaluates the potential environmental impacts to biological resources either directly or indirectly as a result of the project.

A desktop literature review was conducted to determine sensitive biological resources that have been documented in or near the Infill Rezone Sites since 2014. Special-status plant and wildlife species and protected habitats that are present or potentially present within or adjacent to the project area were identified using the following sources:

- USFWS Information for Planning and Consultation (IPaC) Trust Resource Report[1]
- California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB)[2]
- California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Vascular Plants[3]
- U.S. Fish and Wildlife Services (USFWS) Critical Habitat Portal[4]
- USFWS National Wetland Inventory Wetland Mapper[5]
- CDFW Biogeographic Information and Observation System[6]
- CDFW Special Animals List[7]

The CNPS database search included the 7.5-minute United States Geological Survey *Clovis* quadrangle and surrounding eight quadrangles (referred to as a "nine-quad search"). The CNDDB database search included the 20 Infill Rezone Program sites plus a 5-mile buffer. The IPaC search included the project area and a 1-mile buffer surrounding the project area. Following a review of these resources, Rincon also reviewed relevant life history information on those species documented as occurring in the region, including habitat type, soils, and elevation preferences.

4.3.1 Setting

The project area consists of 20 Infill Rezone Program sites within the existing City of Clovis boundaries and Sphere of influence. The City of Clovis is located east of the City of Fresno and west of the Sierra Nevada mountains.

All Infill Rezone Program sites within the proposed General Plan Amendment are within the Urban Land Use boundary in the Clovis General Plan. Half of the sites are currently developed or disturbed, while the remaining half have likely been previously disturbed, or experience intermittent disturbances such as mowing and disking. When developed, the Infill Rezone Program sites under the proposed project would be constructed as infill development or redevelopment. Sites 3, 63, 72, 197, 217, 589, 590, 592, 598, and 599 are disturbed or already developed lands and Sites 108, 110, 115, 157, 161, 167, 168, 595, 596, and 597 are either all or mostly vacant and undeveloped. The

[1] USFWS. 2025a. Information for Planning and Consultation (IPaC). http://ecos.fws.gov/ipac/ (accessed April 2025).
[2] CDFW 2025a. California Natural Diversity Database, Rarefind V. 5.3.0 (accessed April 2025).
[3] CNPS, Rare Plant Program. 2025. Inventory of Rare and Endangered Plants of California (online edition, v9.5.1). California Native Plant Society, Sacramento, CA. http://www.rareplants.cnps.org (accessed April 2025).
[4] USFWS. 2025b. Critical Habitat Portal. Retrieved from: http://criticalhabitat.fws.gov (April 2025).
[5] USFWS. 2025c. National Wetlands Inventory. Retrieved from: http://www.fws.gov/wetlands/ (April 2025).
[6] CDFW. 2025b. California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System. http://bios.dfg.ca.gov (accessed April 2025).
[7] CDFW. 2025c. California Sensitive Natural Communities. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline (accessed April 2025).

Infill Rezone Program sites and their existing use, as well as the current land cover/vegetation is described in Table 4.3-1.

Table 4.3-1 Infill Rezone Program Sites

Site Number	Existing Land Use (2014 General Plan)	Current Land Cover/Vegetation
3	General Commercial	Developed/Disturbed
63	Low Density Residential	Developed/Disturbed
72	Low Density Residential	Developed/Disturbed
108	General Commercial	Wild Oats and Brome Grasslands
110	Medium Density Residential	Wild Oats and Brome Grasslands
115	Medium Density Residential	Wild Oats and Brome Grasslands
157	Mixed Used Village	Wild Oats and Brome Grasslands
161	Office	Wild Oats and Brome Grasslands
167	Office	Wild Oats and Brome Grasslands
168	Office	Wild Oats and Brome Grasslands
197	Very Low Density Residential	Developed/Disturbed
217	Industrial	Developed/Disturbed
589	Low Density Residential	Developed/Disturbed
590	Medium Density Residential	Developed/Disturbed
592	Low Density Residential	Developed/Disturbed
595	Low Density Residential	Wild Oats and Brome Grasslands
596	Low Density Residential	Wild Oats and Brome Grasslands
597	Low Density Residential	Wild Oats and Brome Grasslands
598	Low Density Residential	Developed/Disturbed
599	Low Density Residential	Developed/Disturbed

A freshwater emergent wetland is identified by the National Wetland Inventory in the northeast corner of Site 63, but the wetland has likely been graded/disturbed due to adjacent development based on review of aerial imagery. No other wetlands or riverine habitats are identified within the Infill Rezone Program sites.[8]

Vegetation Communities and Land Cover Types

The vegetation community/land cover type characterizations for this analysis were based on the classification systems presented in *A Manual of California Vegetation, Second Edition* (Sawyer et al. 2009), where applicable. Table 4.3-1 above identifies vegetation community/land cover that occurs on each site.

Developed/Disturbed

The developed/disturbed land cover type includes commercial and industrial buildings, multi- and single-family residences, schools, parks, paved areas with little to no vegetation (e.g., paved roads), and other infrastructure. These areas lack habitat for sensitive biological resources as there is a high level of human disturbance and a lack of natural habitat types that would support breeding, cover,

[8] USFWS. 2025c. National Wetlands Inventory. Retrieved from: http://www.fws.gov/wetlands/ (April 2025).

and foraging activities for special-status species. Half of the Infill Rezone Program sites are developed/disturbed (Figure 4.3-1, Figure 4.3-2, Figure 4.3-3 (site 197), Figure 4.3-4, Figure 4.3-5, Figure 4.3-7, Figure 4.3-12, Figure 4.3-13, Figure 4.3-14 (site 590)).

Wild Oats and Brome Grasslands

Wild oats and annual brome grasslands (*Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance) are generally found in open areas in valleys and foothills throughout coastal and interior California. They typically occur on soils consisting of fine-textured loams or clays that are somewhat poorly drained. Non-native annual grasses and weedy annual and perennial forbs, primarily of Mediterranean origin, dominate this vegetation type, likely as a result of human disturbance. Scattered native grasses and wildflower species representing remnants of the original vegetation community may also be common (Sawyer et al. 2009). This vegetation alliance is not considered sensitive due to the predominance of non-native species.[9]

Wild oats and annual brome grasslands occur in the vacant lots of the Infill Rezone Program (Figure 4.3-3 (site 157), Figure 4.3-6, Figure 4.3-8, Figure 4.3-9, Figure 4.3-10, Figure 4.3-11, Figure 4.3-14 (site 115)). Aerial imagery shows some of these vacant lots have regular maintenance through mowing and disking.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

The Federal Endangered Species Act of 1973 (FESA) and subsequent amendments provide for the conservation of endangered and threatened species, and the ecosystems upon which they depend.

FESA is intended to prevent the unlawful "take" of listed fish, wildlife, and plant species. Section 9(a)(1)(B) specifically states take of species listed as threatened or endangered is unlawful. Take is defined as any action that would harass, harm, pursue, hunt, wound, shoot, kill, trap, capture, or collect any threatened or endangered species.

Section 7 of the FESA requires federal agencies to aid the conservation of listed species, and to ensure that the activities of federal agencies will not jeopardize the continued existence of listed species or adversely modify designated critical habitat. The USFWS and the National Oceanic and Atmospheric Administration (NOAA) are responsible for administration of the FESA and have regulatory authority over federally listed species.

Section 10 of the FESA allows the USFWS to issue incidental take permits if take of a listed species may occur during otherwise lawful activities. Section 10(a)(1)(B) requires a Habitat Conservation Plan for an incidental take permit on non-federal lands.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) makes it unlawful at any time, by any means or in any manner, to pursue, hunt, take, capture, or kill migratory birds, and prohibits the removal of nests occupied by migratory birds. The USFWS administers the MBTA.

[9] CDFW. 2025c. California Sensitive Natural Communities. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline (accessed April 2025).

United States Army Corps of Engineers Jurisdiction

The United States Army Corps of Engineers (USACE), under provisions of Section 404 of the Clean Water Act (CWA) and USACE implementing regulations, has jurisdiction over the placement of dredged or fill material into "waters of the United States." Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Previous regulations codified in 1986 defined "waters of the United States" as traditional navigable waters, interstate waters, all other waters that could affect interstate or foreign commerce, impoundments of waters of the United States, tributaries, the territorial seas, and adjacent wetlands.

On March 20, 2023, the United States Environmental Protection Agency (USEPA) and the USACE released a revised definition of waters of the United States. This rule defines several categories of jurisdictional waters, documents certain types of waters that are excluded from jurisdiction and clarifies some regulatory terms. Under the revised definition, waters of the United States include:

1. Territorial seas and traditional navigable waters;
2. Perennial and intermittent tributaries that contribute surface flow to those waters;
3. Certain lakes and ponds, and impoundments of jurisdictional waters, and;
4. Wetlands adjacent to jurisdictional waters.

USACE jurisdictional limits are typically identified by the ordinary high water mark (OHWM) or the landward edge of adjacent wetlands (where present). The OHWM is the "line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area" (33 Code of Federal Regulations (CFR) 328.3).

The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). The USACE's delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology.

b. State Regulations

California Endangered Species Act

The CDFW is responsible for administration of the California Endangered Species Act (CESA). For projects that affect both a State and federal listed species, compliance with the FESA will satisfy the CESA if the CDFW determines that the federal incidental take authorization is consistent with the CESA. Projects that result in take of a California listed species require a take permit under the CESA. The federal and State acts lend protection to species that are considered rare enough by the scientific community and trustee agencies to warrant special consideration, particularly with regard to protection of isolated populations, nesting or den locations, communal roosts, and other essential habitat. Unlike the FESA, the CESA prohibits the take of not just listed endangered or threatened, but also candidate species (species petitioned for listing).

The CESA defines an endangered species as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant which is in serious danger of becoming extinct throughout all, or a significant portion, of its range due to one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, or disease.

A threatened species is defined as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that, although not presently threatened with extinction, is likely to become an endangered species in the foreseeable future in the absence of the special protection and management efforts required by this chapter. Any animal determined by the commission as rare on or before January 1, 1985 is a threatened species.

Candidate species are defined as:

> …a native species or subspecies of a bird, mammal, fish, amphibian, reptile, or plant that the commission has formally noticed as being under review by the department for addition to either the list of endangered species or the list of threatened species, or a species for which the commission has published a notice of proposed regulation to add the species to either list.

Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Article 3, Sections 2080 through 2085, of the CESA addresses the taking of threatened or endangered species by stating:

> …no person shall import into this State, export out of this State, or take, possess, purchase, or sell within this State, any species, or any part or product thereof, that the commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided.

Under the CESA, "take" is defined as, "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Additionally, some sensitive mammals and birds are protected by the state as Fully Protected Mammals or Fully Protected Birds, as described in the California Fish and Game Code (FGC), Sections 4700 and 3511, respectively.

Nesting Bird Protection – California Fish and Game Code

According to California FGC Section 3503 it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. Sections 3503 and 3513 prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). Section 3513 essentially overlaps with the federal MBTA, prohibiting the take or possession of any migratory nongame bird. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered "take" by CDFW.

California Native Plant Protection Act

The California Native Plant Protection Act (NPPA) was enacted in 1977 and allows the Fish and Game Commission to designate plants as rare or endangered. Currently, 64 species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or

rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. Effective in 2015, CDFW promulgated regulations (14 California Code of Regulations (CCR) 786.9) under the authority of the NPPA, establishing that the CESA permitting procedures (California FGC Section 2081) would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

California Department of Fish and Wildlife

Stream and Riparian Habitat

Pursuant to California FGC Section 1600, CDFW has authority over all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state, and requires any person, state or local governmental agency, or public utility to notify the CDFW before beginning any activity that would "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" that supports fish or wildlife resources.

A stream is defined as a "body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation." A Lake or Streambed Alteration Agreement may be required for any proposed project that would result in an adverse impact to a river, stream, or lake. CDFW jurisdiction typically extends to the top of the bank and out to the outer edge of adjacent riparian vegetation if present. However, CDFW can take jurisdiction over a body of flowing water and the landform that conveys it, including water sources and adjoining landscape elements that are byproducts of and affected by interactions with flowing water without regard to size, duration, or the timing of flow.

Special-Status Species Protection

Special-status wildlife species are those species included on the CDFW "Special Animals" list. "Special Animal" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFW considers the taxa on this list to be those of greatest conservation need. The species on this list generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the State and/or Federal Endangered Species Acts;
- State or Federal candidate for possible listing;
- Taxa that meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the California Environmental Quality Act (CEQA) Guidelines;
- Taxa considered by the Department to be a Species of Special Concern;
- Taxa that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical vulnerable stage in their life cycle that warrants monitoring;
- Populations in California that may be on the periphery of a taxon's range but are threatened with extirpation in California.

c. Local Regulations

Clovis General Plan

There are no habitat conservation plans or natural community conservation plans in effect on any of the 20 Infill Rezone Program sites; nor are there any designated for wildlife conservation or habitat conservation under the 2014 Clovis General Plan.[10] The following General Plan policy aims to conserve natural resources in the City of Clovis.

- **Open Space and Conservation Element - Policy 2.6:** Biological resources. Support the protection of biological resources through the conservation of high quality habitat area.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The following analysis is based on a literature review concerning biological resources known to occur in the area that is derived from biological resource databases and information on biological resources described in literature, such as, but not limited to, the City of Clovis 2014 General Plan Environmental Impact Report (EIR). The literature review was conducted to assess and verify the environmental setting and to analyze potential impacts that could result from implementation of future projects at the 20 Infill Rezone Program sites on sensitive biological resources. This includes special-status plant and wildlife species, habitat for nesting birds and bats, riparian and other sensitive plant communities, federal and state waters and wetlands, locally protected trees, wildlife movement corridors, and habitat conservation planning areas.

Significance Thresholds

Consistent with the 2014 General Plan EIR and in substantial conformance with CEQA Guidelines Appendix G, impacts related to biological resources would be significant if the Project would:

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 CDFW or USFWS.
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 CDFW or USFWS.
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.

[10] Clovis, City of. 2014. Clovis General Plan and Development Code Update Draft PEIR. Prepared by Placeworks. Accessed April 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

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.

b. Prior Environmental Analysis

The 2014 General Plan EIR addressed potential biological resources impacts in Chapter 5.4, *Biological Resources* of the Draft EIR. The 2014 General Plan EIR determined that impacts to biological resources would be less than significant for effects to listed species or their habitats, loss of significant populations of sensitive species, protected wetlands, wildlife migration or movement corridors, local policies or ordinances protecting biological resources, or conflicts with conservation plans and habitat management plans and habitat groups identified therein (Chapter 5.4, *Biological Resources*: 5.4-1 through 5.4-34). It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to standards for the protection of biological resources. As such all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning the protection of biological resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources.

The proposed project involves rezoning 20 sites within the City of Clovis. Therefore, the following impact analysis is programmatic to determine whether the proposed rezoning is consistent with the Biological Resources impacts identified in the 2014 General Plan EIR.

c. Project Impacts and Mitigation Measures

Some components associated with the proposed project, including updates to the General Plan, and master and specific plans for consistency between the City's planning documents, in and of themselves would not result in physical changes to the environment such that impacts to biological resources would occur. Therefore, this analysis focuses on impacts associated with implementation of the Infill Rezone Program which would facilitate the rezoning of 20 sites listed in Table 2-1 in Chapter 2, *Project Description.*

Threshold 1:	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 CDFW or USFWS?

Impact BIO-1 THE PROPOSED PROJECT WOULD NOT IMPACT SPECIAL STATUS SPECIES OR THEIR HABITATS.

The potential impacts concerning candidate, sensitive, or special-status species are discussed in the 2014 General Plan (GP) EIR Section 5.4.8 (Page 5.4-34). The 2014 GP EIR analysis concluded that implementing the mitigation measures provided would reduce impacts associated with biological species to a level that is less than significant.

The 2014 General Plan EIR identified 13 special-status plants with the potential to occur within the project area. Current CNPS and CNDDB database searches identified 16 plants that have documented occurrences within a 5-mile buffer of the Infill Rezone Program sites. Ewan's larkspur (*Delphinium hansenii* ssp. *ewanianum*) and California satintail (*Imperata brevifolia*) were not identified in the 2014 General Plan EIR but have California Rare Plant Ranks of 4.2 and 2B.1, respectively, and no state or federal status. Pincushion navarretia (*Navarretia myersii* ssp. *myersii*), a special-status vernal pool plant, was not identified in the original analysis of the 2014 General Plan

EIR, but was identified in current database searches. However, observations of this plant have not been recorded to CNDDB within five miles of the Infill Rezone Program sites and no suitable habitat is located within the Infill Rezone Program sites. Based on aerial imagery, the mapped wetland analyzed in the 2014 GP EIR at Site 63 appears to no longer be present due to urbanization and would therefore is not suitable for special-status vernal pool plants.

The 2014 General Plan EIR identified nine special-status animal species with the potential to occur in the project area. Current database searches identified 32 special-status animal species with documented occurrences within five miles of the Infill Rezone Program sites. Additional species included in this analysis were not previously analyzed due to increased search area and updates to endangered species lists. For example, Crotch's bumblebee was not analyzed in the 2014 GP EIR and has since become a California State Candidate for listing as Endangered. There is low to no potential for the remaining 23 species to occur within the Infill Rezone Program sites due to heavy disturbance and urbanization.

The mitigation measures provided in the 2014 GP EIR are sufficient to reduce impacts to species not originally included in the analysis by requiring pre-construction surveys, focused plant and animal surveys if the habitat is present, and delineation of jurisdictional boundaries around potential waters of the United States or State. Mitigation measures require avoidance, if possible, of biological resources identified in the pre-construction surveys; consultation with agencies; and planning of projects to minimize potential impacts to biological resources.

The potential for wildlife movement corridors was evaluated based on the California Essential Habitat Connectivity Project commissioned by the California Department of Transportation and CDFW (Spencer et al. 2010). The nearest wildlife movement corridor is over one mile northeast of Sites 157 and 197. None of the other sites are close to any wildlife corridors. Therefore, there would be no effect on wildlife movement.

Implementation of GP EIR Biological Resources Mitigation Measures (MMs) 4-1, 4-2, 4-3, and 4-4 would reduce potential impacts to special-status and/or locally important species to a less than significant level, and assure compliance with the FESA, CESA, CWA, MBTA, and California FGC Section 3503, by requiring a biological study to document the presence or absence of special-status species on a project specific basis and determining measures to address impacts such as avoidance, minimization, restoration, or compensation to special-status should they be present, and by ensuring that active nests are identified and as necessary avoided.

The Infill Rezone Program sites would require project-level, site-specific surveys prior to construction activities per the Clovis General Plan mitigation measures as copied below; therefore, no additional mitigation measures are recommended.

Mitigation Measures

With implementation of Biological Resources MMs 4-1, 4-2, 4-3, and 4-4 from the 2014 General Plan EIR, no additional mitigation measures are required.

GP EIR MM 4-1 - Biological Assessment and Focused Surveys

The City shall require applicants for future development or redevelopment projects that disturb vegetated, vacant land pursuant to prepare a biological resources survey. The survey shall be conducted by a qualified biologist. The biological resources survey shall include, but not be limited to:

- Analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed development project vicinity.
- Review of current land use and land ownership within the proposed development project vicinity.
- Assessment and mapping of vegetation communities present within the proposed development project vicinity.
- Evaluation of potential local and regional wildlife movement corridors.
- General assessment of potential jurisdictional areas, including wetlands and riparian habitats.

a) If the proposed development project site supports vegetation communities that may provide habitat for special status plant or wildlife species, a focused habitat assessment shall be conducted by a qualified biologist to determine the potential for special status plant and/or animal species to occur within or adjacent to the proposed development project area.

b) If one or more special status species has the potential to occur within the proposed development project area, focused species surveys shall be conducted to determine the presence/absence of these species to adequately evaluate potential direct and/or indirect impacts to these species.

c) If construction activities are not initiated immediately after focused surveys have been completed, additional preconstruction special status species surveys may be required, in accordance with the California Endangered Species Act and Federal Endangered Species Act, to assure impacts are avoided or minimized to the extent feasible. If preconstruction activities are required, a qualified biologist will perform these surveys as required for each special status species that is known to occur or has a potential to occur within or adjacent to the proposed development project area.

The results of the biological survey shall be presented in a biological resources survey letter report (for proposed development projects with no significant impacts) or biological resources technical report (for proposed development projects with significant impacts that require mitigation to reduce the impacts to below a level of significance) and submitted to the City's Planning Director.

GP EIR MM 4-2 - Resource Impact Avoidance/Minimization

Project applicants shall avoid potential impacts to sensitive or protected biological resources. Avoidance may include:

- establishing appropriate no-disturbance buffers (consultation with relevant regulatory agencies may be required to establish suitable buffer areas)
- initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g., outside the avian nesting season or bat maternal or wintering roosting season).
- minimizing impact by measures such as:
  - exclusion and/or silt fencing;
  - relocation of impacted resources;

- construction monitoring by a qualified biologist;
- training program by a qualified biologist for construction personnel on sensitive biological resources.

GP EIR MM 4-3 - Compensatory Mitigation

If project-related impacts cannot be avoided or minimized to less than significant in accordance with Mitigation Measure 4-3; feasible, compensatory mitigation shall be developed by a qualified biologist and implemented to reduce impacts to sensitive or protected biological resources. Mitigation may include but is not limited to:

- Compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement;
- Purchase of appropriate credits from an approved mitigation bank servicing the Clovis General Plan Update Area;
- Payment of in-lieu fees.

GP EIR MM 4-4 - Jurisdictional Wetlands

The City shall require applicants of development projects that have the potential to affect jurisdictional resources, to contract with a qualified biologist to conduct a jurisdictional delineation following the methods outlined in the US Army Corps of Engineers Wetland Delineation Manual to map the extent of wetlands and nonwetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in a wetland delineation letter report and shall be incorporated into the CEQA document(s) required for approval and permitting of the proposed development project.

Applicants of development projects that have the potential to impact jurisdictional features shall obtain permits and authorizations from the US Army Corps of Engineers, California Department of Fish and Wildlife, and/or Central Valley Regional Water Quality Control Board. The agency authorization would include impact avoidance and minimization measures as well as mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed development project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.

Significance after Mitigation

Less than significant with mitigation measures.

Threshold 2:	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Impact BIO-2 THERE WOULD BE NO SUBSTANTIAL EFFECT ON RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITIES.

Riparian habitats and other sensitive natural communities within the project area tracked by the CNDDB include Great Valley Mixed Riparian Forest, Northern Claypan Vernal Pool, Northern

Hardpan Vernal Pool, and Sycamore Alluvial Woodland.[11] None of these communities are present at the Infill Rezone Program sites. None of the sites are within or adjacent to riparian habitats. The Infill Rezone Program sites consist of developed areas or disturbed non-native grasslands which are not considered sensitive. Therefore, there is no impact on any riparian habitat or sensitive natural communities.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	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?

Impact BIO-3 THERE WOULD BE NO SUBSTANTIAL EFFECT ON WETLANDS.

State or federally protected wetlands are not present in any of the Infill Rezone Program sites.[12] Based on aerial imagery, special-status vernal pool plants are not found within five miles of Site 63 indicating the mapped wetland is no longer present due to urbanization. Therefore, there are no impacts on wetlands. Required adherence to Clovis General Plan Mitigation Measure 4-4, listed above, would ensure wetland impacts, if identified in the future, would be mitigated.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	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?

Impact BIO-4 THERE WOULD BE NO IMPACT ON WILDLIFE MOVEMENT.

There are no aquatic habitats mapped within or adjacent to the Infill Rezone Program sites. There are no mapped wildlife corridors within any of the rezone sites. The closest wildlife corridor is over one mile northeast of Sites 157 and 197.[13] Therefore, the project would not interfere with any wildlife movement.

Mitigation Measures

No mitigation measures are required.

[11] CDFW. 2025c. California Sensitive Natural Communities. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline (accessed April 2025).
[12] USFWS. 2025c. National Wetlands Inventory. Retrieved from: http://www.fws.gov/wetlands/ (April 2025).
[13] CDFW. 2025b. California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System. http://bios.dfg.ca.gov (accessed April 2025).

Threshold 5:	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 THE PROJECT WOULD NOT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES.

Open Space and Conservation Element Policy 2.6 of the City of Clovis General Plan states that projects should "support the protection of biological resources through the conservation of high quality habitat area."[14] The Infill Rezone Program sites are within the urban land use of the City of Clovis and not considered "high quality habitat areas." The General Plan does not have any tree preservation ordinance. Clovis Municipal Code (CMC) Section 9.30 establishes tree protection regulations and standards. Future development on any of the 20 Infill Rezone Program sites requiring the removal of protected trees as defined in CMC Section 9.30.040 would be required to obtain a tree removal permit. Therefore, the project would not conflict with any local policies or ordinances.

Mitigation Measures

No mitigation measures are required.

Threshold 6:	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?

Impact BIO-6 THE PROJECT WOULD NOT CONFLICT WITH ANY HABITAT CONSERVATION PLANS, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER STATE OR LOCAL CONSERVATION PLAN.

The Infill Rezone Program sites are not within the boundaries of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any conservation plan.

Mitigation Measures

No mitigation measures are required.

4.3.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if 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." (CEQA Guidelines Section 15065(a)(3).) The geographic area to analyze cumulatively considerable biological resource impacts includes the 20 Infill Rezone Program sites and immediately adjacent areas that could be affected by other current or future projects. Cumulative impacts to biological resources are typically site and project specific. Subsequent projects allowed by the proposed project may result in site-specific impacts to biological resources including nesting birds. However, the mitigation measures included in the 2014 General Plan EIR would reduce potential impacts to biological resources to a less than significant level. Since the exact size and nature of future developments are not known at this time, it would be speculative to predict what impacts may occur. The Infill Rezone Program sites are within the urban setting of the City of Clovis and are previously disturbed and/or developed. Any

[14] Clovis, City of. 2014. Clovis General Plan and Development Code Update Draft PEIR. Prepared by Placeworks. Accessed April 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

currently proposed, future, and past projects within the urban setting of the City of Clovis would alter developed and/or previously disturbed lands.

Completing the rezoning through Zoning Map and General Plan amendments for the 20 Infill Rezone Program sites would allow for the future development of the sites that better meet the needs of the community. Future development of the 20 Infill Rezone Program sites would result in the redevelopment of developed areas and removal of wild oats and brome grasslands. Habitats in the proposed Infill Rezone Program sites and adjacent to Infill Rezone Program sites are not expected to harbor special-status species, sensitive natural communities, or other protected natural resources. Therefore, the cumulative effects of the proposed project when considered with past, current, and future projects nearby would not result in significant cumulative impacts to sensitive natural resources.

Mitigation Measures

Implement mitigation measures GP EIR MM 4-1, 4-2, 4-3, and 4-4.

Significance after Mitigation

Less than significant with mitigation measures.

Figure 4.3-1 Clovis Infill Rezone Program Site 72



Figure 4.3-2 Clovis Infill Rezone Program Site 592



Figure 4.3-3 Clovis Infill Rezone Program Sites 157 and 197



Figure 4.3-4 Clovis Infill Rezone Program Site 63



Figure 4.3-5 Clovis Infill Rezone Program Site 3



Figure 4.3-6 Clovis Infill Rezone Program Site 108



Figure 4.3-7 Clovis Infill Rezone Program Site 589



Figure 4.3-8 Clovis Infill Rezone Program Sites 595, 596, and 597



Figure 4.3-9 Clovis Infill Rezone Program Sites 167 and 168



Figure 4.3-10 Clovis Infill Rezone Program Site 161



Figure 4.3-11 Clovis Infill Rezone Program Site 110



Figure 4.3-12 Clovis Infill Rezone Program Site 217



Figure 4.3-13 Clovis Infill Rezone Program Sites 598 and 599



Figure 4.3-14 Clovis Infill Rezone Program Sites 115 and 590



4.4 Cultural Resources

This section analyzes impacts to cultural resources within Clovis that would result from the project, which includes the rezoning of 20 sites within the city limits. Cultural resources include sites, buildings, landmarks, and other physical markers important to our understanding of indigenous peoples, and the history of Clovis and the region since colonization. Appendix C to this Environmental Assessment (EA) is the 2025 Cultural Resources Report that was used to prepare this impact section. All reference citations can be found in Appendix C, incorporated here by reference.

4.4.1 Cultural Setting and Existing Conditions

As described in Appendix C to the EA, the 20 Infill Rezone Program sites are located within the Clovis city limits within California's Central Valley, one of the largest intermontane basins in North America that extends 650 km from the Siskiyou to the Tehachapi mountains. No single chronological framework covers the entirety of the Central Valley, but California prehistoric cultural chronology of the Central Valley can be divided into five major periods of cultural development: the Paleoindian (11,550–8,550 BCE), Lower Archaic (8,550–5,550 BCE), Middle Archaic (5,550–550 BCE), Upper Archaic (550 BCE–CE 1,100), and the Emergent Period (CE 1,000 to Historic contact).

Paleoindian Period (11,550 to 8,550 BCE)

Geoarchaeological studies have demonstrated that erosion and deposition have buried or destroyed early archaeological deposits from the Paleoindian Period in the Central Valley. Human occupation during this period is represented by isolated finds, including fluted projectile and concave base projectile points near Tracy Lake and Tulare Lake basin and shoreline, dating from approximately 11,550 to 9,550 BCE.

Lower Archaic (8,550 to 5,550 BCE)

Climate change at the end of the Late Pleistocene caused significant periods of alluvial deposition with clear stratigraphic boundary between the Holocene beginning around 9,050 BCE. The Lower Archaic, like the Paleoindian Period, is represented only by limited isolated finds. Only one Lower Archaic site (KER-116) has been identified in the Central Valley proper and few in the foothills surrounding the valley suggesting that the foothill sites may have been seasonally used during this time.

Middle Archaic (5,550 to 550 BCE)

The Middle Archaic Period was marked by warmer, drier conditions that reshaped the Central Valley's landscape, including the disappearance of Tulare Lake and the formation of the Sacramento-San Joaquin Delta. Archaeological evidence from this period is limited but indicates increased residential stability and organized subsistence strategies. The Windmiller Pattern, characterized by extended west-oriented burials and a diverse material culture, emerged during this time. During the Middle Archaic, use of the mortar and pestle became more widespread, suggesting a shift toward more intensive subsistence practices and a higher reliance on acorn. Fishing technologies, such as bone gorges, hooks, and spears, specifically in the Marsh Creek area, suggest a new focus on fishing. This period also saw the introduction of basketry, simple pottery, and baked clay objects. Personal adornments became more common, and trade expanded to include utilitarian items like obsidian tools and decorative goods such as shell beads and ornaments.

Upper Archaic (550 BCE to CE 1,100)

The Upper Archaic coincided with the onset of the Late Holocene, marked by a cooler, wetter climate leading to the reappearance of lakes and renewed floodplain activity. This period is better represented in the archaeological record than earlier periods. Cultural diversity was more pronounced and is marked by contrasting material cultures throughout the valley.

During this period, numerous specialized technologies were developed such as bone tools, and implements, manufactured goods such as beads and ornaments, well-made ceremonial blades, and ground-stone plummets.

Upper Archaic Period trade economies varied by region throughout the Central Valley but were primarily focused on seasonal resources such as acorns, salmon, shellfish, rabbits, and deer, as well as obsidian.

Emergent Occupation (CE 1000 to Historic)

There has been limited research in the San Joaquin Valley on the Emergent Period, and thus only the Pacheco Complex on the western edge of the valley has been formally defined. After CE 1,000, many of the technologies witnessed during the Archaic disappeared to be replaced by cultural traditions witnessed at European contact. Sometime between CE 1,000 and 1,300, the bow and arrow replaced the atlatl as the preferred hunting method.

Increased social complexity is evidenced by increased variation in burial types and grave offerings such as shell beads, ornaments, and ritually "killed" mortars and pestles are often found in burials. Trade expanded with groups living in the easter foothills, with pottery and obsidian exchanged across regions. The Panoche Complex, active in the western San Joaquin Valley, featured side-notched points, large structures, and diverse artifacts. Economies were more regionally varied, with greater emphasis on fishing and plant harvesting. Mortars and pestles became dominant tools, and small seed remains increased in archaeological deposits over time.

Ethnographic Overview

The City of Clovis is located in the traditional territory of the Penutian-speaking Yokuts, which includes San Joaquin Valley and surrounding foothills.[1,2] Three geographical divisions of the Yokuts are the Northern Valley, Southern Valley, and Foothill Yokuts. The distinction between the three groups is primarily based on language dialect.[3] The Infill Rezone Program sites are located within the approximate boundary between the ethnographic territories of the Northern and Southern Valley Yokuts, though more likely located within the ethnographic territory of the Southern Valley Yokuts, who occupied the southern San Joaquin Valley south of the San Joaquin River, to the foot of the Tehachapi Mountains. More specifically, the vicinity was likely within the territory of the Tachi.[4]

[1] Kroeber, Alfred L. 1925. Handbook of the Indians of California. Bulletin 78, Bureau of American Ethnology, Smithsonian Institution. Government Printing Office, Washington, D.C. Reprinted 1976 by Dover Publications, Inc., New York.
[2] Wallace, William J. 1978. Southern Valley Yokuts." In "California," edited by Robert F. Heizer. *Handbook of North American Indians,* Vol. 8, pp. 448–461. Smithsonian Institution, Washington.
[3] Mithun, Marianne. 2001. The Languages of Native North America. Reprinted. Originally published 1999. Cambridge University Press, New York.
[4] Wallace, William J. 1978.

Post-Contact Historical Context

Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, post-contact history for the State of California is generally divided into three periods: the Spanish Period (1769 to 1822), Mexican Period (1822 to 1848), and American Period (1848 to present). Appendix C to the EA describes post-contact historical context in greater detail.

Spanish Period (1769 – 1822)

The Spanish Period in California (1769-1822) begins with the establishment of Mission San Diego de Alcalá in 1769. Between 1769 and 1823, Spanish explorers made sailing expeditions along the coast of California to construct missions, presidios, and pueblos to secure its hold on the territory and counter against other foreign explorers.

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns. Three pueblos were established during the Spanish Period, two of which led to the creation of California cities: San José and Los Angeles.

Mexican Period (1822 – 1848)

The Mexican Period began after independence from Spain in 1821. Growth in Alta California remained limited due to foreign threats, political instability, and indigenous unrest. In 1822, trade restrictions were lifted, opening California ports to foreign merchants. Mission secularization led to the redistribution of mission lands and the creation of inland ranchos, often granted to former soldiers and influential families with full land ownership. From 1834 to 1848, the cattle industry dominated the economy, with hides serving as a key export. Increased settlement introduced foreign diseases to Native populations, contributing to significant demographic impacts.

American Period (1848 – Present)

The signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States (U.S.). California officially became a U.S. state in 1850. The Gold Rush, beginning in 1848, spurred rapid population growth and economic expansion in the northern part of the state, with cattle remaining a key commodity for meat and hides. Rancho vaqueros drove herds north to support mining communities. A severe drought in the 1860s devastated cattle herds and ranchero incomes. Disputes over poorly defined land boundaries led to legal conflicts, debt, and the sale of rancho lands, which were eventually subdivided into farms and towns, reshaping California's landscape and settlement patterns.

City of Clovis History

Since the community's founding in the final decade of the nineteenth century, life in Clovis has historically centered on the fertile farmlands that surround the City. The history excerpted below is from the *Draft Program Environmental Impact Report for the City of Clovis General Plan and Development Code Update*.[5]

[5] City of Clovis. Draft Program Environmental Impact Report, General Plan and Development Code Update. 2014. Accessed July 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

Clovis was founded following the construction of a freight stop along the recently completed San Joaquin Valley Railroad in 1891. As the agricultural potential of Fresno County began to be realized in the late nineteenth century, a number of individuals rapidly developed the railway to transport the region's grain, cattle, and timber longer distances. In close proximity to agriculture and the nearby Sierras, the new stop had an ideal location and was named after local farmer Clovis M. Cole, who sold a large portion of his wheat ranch in support of the railway.

Another contributor to the growth of Clovis was the Fresno Flume and Irrigation Company. The company constructed the Shaver Log Flume that started at the Shaver Dam and traveled 42 miles into the valley to the present-day intersection of Fifth Street and Clovis Avenue. Here, the company constructed a 40-acre mill and finishing plant, which served as an impetus for the further development of Clovis as workers arrived to work at the plant.

A number of businesses, churches, and schools soon developed in response to the increasing population and, by 1895, the community had its first post office. Italian immigrants brought grape production to Clovis with the first vineyards in the region. Clovis incorporated in 1912 and grew modestly into the 20th century, with its economy continuing to rely primarily on agriculture. An unprecedented demand for canned food occurred with the onset of World War I, stimulating the local economy and growth in the City. As evidence of the City's changing status, Clovis High School was relocated to an ornate, Spanish-designed building in 1920.

Increased agricultural production required additional water, and the Central Valley Project (CVP) was undertaken in the early 1930s to provide irrigation and water management to the San Joaquin Valley. The CVP began as a New Deal project but was not completed until the early 1950s due to labor shortages caused by World War II. An original component of the CVP was the Friant-Kern Canal, which flows immediately northeast of Clovis. The City experienced a modest building boom in the years following World War II as a number of housing developments expanded away from the city center. Although residential growth has continued since that time, the City continues to maintain its small-town character.

Existing Conditions

As part of the 2025 Cultural Resources Report, Appendix C to this EA, a cultural resources records search of the California Historical Resources Information System (CHRIS), Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, and preliminary background research for each rezone site was conducted to analyze constraints for potential future development and the potential to impact historical and archaeological resources.

Historical Resources in Project Area

Based on a CHRIS records search, 46 built environment resources were identified within a half-mile radius of the rezone sites. Resources include one railroad segment, agricultural buildings, public and religious buildings (i.e., libraries and churches), water conveyance features (i.e., ditches and canals), and single-family residences. No historical resources were identified within the rezone sites. As shown on Table 4.4-1, two resources were identified as ineligible for the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR), as summarized below, and are not considered historical resources as defined by the California Environmental Quality Act (CEQA) Section 15064.5(a).

Table 4.4-1 Historical Resources in Project Area

Resource Name/#	Description	Eligibility	Historical Resource?	Rezone Site
Helm Colonial Ditch (P-10-005511/CA-FRE-3344H)	Water conveyance feature	Found Ineligible for NRHP, CRHR, and local listing	No	72
Jefferson Canal (P-10-006140/CA-FRE-3615H)	Water conveyance feature	Found Ineligible for NRHP, CRHR, and local listing	No	599

Based on review of parcel data, historic maps, and aerials, 10 of the Infill Rezone Program sites contain buildings that are or will become historic-aged, and will require evaluation prior to demolition or alteration of the properties during future development projects. These parcels are shown in Table 4.4-2 below.

Table 4.4-2 Inventory of Infill Rezone Program Sites by Build Date

Site ID	APN	Address	Vacant?	Existing Use	Built Date
3	49102042	270 W Herndon Ave	No	Single-family residence; Sports facility; Tree lot	c. 1965
63	56303207	1933 Alluvial Ave	No	Single family residence	1971
72	56008207	437 W Nees Ave	No	Single family residence	1978
197	55849230	1497 N Locan Ave	No	Single family residence	1988
217	49954013ST	885 Gettysburg Ave	No	Clovis Academy of Gymnastics & Dance	c. 1980
589	55026023	2403 Bullard Ave	No	Former Rogers Helicopter	c. 1980
590	55458036S	3959 Shaw Ave	No	Single-family residence	c. 1965
592	56303131	1160 N Fowler Ave	No	Single family residence	1976
598	49938442	2560 Fowler Ave	No	Single family residence	1925
599	49938441	2612 Fowler Ave	No	Single family residence	1960

Archaeological Resources

As described in greater detail in Appendix C, the Infill Rezone Program sites are situated within the San Joaquin Valley archeological subregion of the broader Central Valley Archaeological Region which spans from the Sacramento–San Joaquin Delta into today's Kern County. The subregion encompasses the southern half of the great Central Valley and includes most of Kings, Merced, and Stanislaus Counties, as well as the western portions of Fresno, Kern, Madera, and Tulare Counties.

Geologically, the Infill Rezone Program sites are underlain by Quaternary-age alluvial, lacustrine, playa, and terrace deposits. These sediments, primarily composed of unconsolidated or semi-consolidated marine and continental materials, are predominantly alluvial. Due to the episodic nature of alluvial deposition, there is a heightened potential for buried archaeological resources. Human habitation in the Central Valley is estimated to date back as far as 12,000 years. Archaeological sites along the Tulare Lake shoreline and near Tracy Lake, have yielded evidence such as fluted projectile points and concave base points, indicating early human presence in the region during the Late Pleistocene.

Based on the CHRIS records search, negative NAHC SLF search, historic map and aerial review, and geological and soils map review, this study did not identify any previously recorded archaeological resources in any of the proposed rezone sites. However, one rezone site (157) has been previously surveyed, which took place in 2002. Table 4.4-3 shows the seven Infill Rezone Program sites that are

considered to have moderate to high potential for subsurface archaeological deposits. The absence of previously recorded prehistoric or historic-period archaeological resources within the immediate vicinity of the remaining rezone sites, along with the existing level of disturbance, suggests there is a low potential for encountering intact subsurface archaeological deposits.

Table 4.4-3 Properties with Moderate to High Potential for Archaeological Resources

Site ID	APN	Address	Moderate-High Potential for Archaeological Resources
3	49102042	270 W Herndon Ave	High
108	49123124	125 & 135 N Clovis Ave	Moderate
110	49906074	236 & 256 W Santa Ana Ave	Moderate
115	55457044S	1671 Leonard Ave	Moderate
157	55803359S	De Wolf & Richmond Ave	High
161	43043316	2930 Willow Ave	Moderate
167	55128004	1871 Shaw Ave	Moderate

Tribal Cultural Resources in the Project Area

As part of its tribal cultural resource identification process, pursuant to California Assembly Bill (AB) 52 and Senate Bill (SB) 18, the City sent letters via certified mail to Native American tribal contacts who had previously requested consultation and tribes provided by the NAHC. Notification of tribal contacts and tribal cultural resources are detailed in Section 4.14 *Tribal Cultural Resources.*

4.4.2 Regulatory Setting

a. Federal Regulations

National Register of Historic Places

Although the project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context. The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources worthy of preservation. The NRHP recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. Per 36 Code of Federal Regulations Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history.

Criterion B: Is associated with the lives of persons significant in our past.

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location: The place where the historic property was constructed or the place where the historic event occurred.

Design: The combination of elements that create the form, plan, space, structure, and style of a property.

Setting: The physical environment of a historic property.

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time.

Association: The direct link between an important historic event or person and a historic property.

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Environmental Quality Act

California Public Resources Code (PRC) Section 21804.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the CRHR, a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or culturally significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the NRHP are automatically listed in the CRHR and are, therefore, historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a "unique archaeological resource" as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge,

there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2][A]; see also Sections 15064.5[b][2][B-C]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

Section 15126.4 of the CEQA Guidelines stipulates an EIR shall describe feasible measures to minimize significant adverse impacts (which is used for preparation of this EA). In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impact of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the SOI Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and 4852. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.[6] The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for State use to include a range of historical resources that better reflect State history.[7] Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for

[6] California Public Resources Code, § 5024.1(a)). Accessed July 2025: https://california.public.law/codes/public_resources_code_section_5024.1
[7] Ibid.

the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance. Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility. Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility.[8]

California Public Resources Code

Section 5097.5 of the California PRC states:

> No person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used here, "public lands" means lands owned by or under the jurisdiction of the state or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC Section 5097.5 regarding their activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

If a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required.[9]

California Health and Safety Code

The disposition of human remains is governed by Section 7050.5 of the California Health and Safety Code and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

Senate Bill 18 of 2004

California Government Code Section 65352.3, which was adopted pursuant to the requirements of SB 18, requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the NAHC. As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "[t]he intent of SB 18 is to provide California Native American tribes

[8] California Office of Historic Preservation. 1995:2. Instructions for Recording Historical Resources. Department of Parks and Recreation, Sacramento, California.
[9] California Public Resources Code, § 5097.5. (2025). Protection of archaeological and historical resources on public lands. Accessible at: https://california.public.law/codes/public_resources_code_section_5097.5

an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Assembly Bill 52 of 2014

AB 52 expanded CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." AB 52 further states when feasible, the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource. PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe," and meets either of the following criteria:

a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent AB 52 to accomplish the following:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities.
2. Establish a new category of resources in CEQA called "tribal cultural resources" that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation.
3. Establish examples of mitigation measures for tribal cultural resources that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible.
4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated (because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources).
5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning tribal cultural resources, early in the CEQA environmental review process, so that tribal cultural resources can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency.

6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA.
7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to tribal cultural resources and to reduce the potential for delay and conflicts in the environmental review process.
8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.
9. Establish that a substantial adverse change to a tribal cultural resource has a significant effect on the environment.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency.

c. Local Regulations

City of Clovis General Plan

The City's 2014 General Plan includes several goals and policies relevant to the project and the protection of cultural and historic resources, including:

Open Space and Conservation Element

Goal 2: Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

Policy 2.9 National and state historic resources. Preserve historical sites and buildings of state or national significance in accordance with the Secretary of Interior Standards for Historic Rehabilitation.

Policy 2.10 Local historic resources. Encourage property owners to maintain the historic integrity of the site by (listed in order of preference): preservation, adaptive reuse, or memorialization.

Policy 2.12 Public education. Support public education efforts for residents and visitors about the unique historic, natural, and cultural resources in Clovis.

Fresno County Historical Landmarks Commission

Fresno County Historical Landmarks and Records Advisory Commission established the Fresno County List of Historic Places to inventory historic and prehistoric sites and structures, considering all resources, including beyond those currently listed in any state or federal registry program. According to the website, the Commission advises the County Board of Supervisors on matters related to landmark designation and preservation, maintains the county's list of historic places,

recommends properties for inclusion in local, state, and national historic registers, and collaborates with other agencies and community organizations to support historic preservation efforts.[10]

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

If a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project would have a significant effect on the environment (*CEQA Guidelines* Section 15064.5[b]).

Significance Thresholds

To determine whether a project would result in a significant impact related to cultural resources, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
3) Disturb any human remains, including those interred outside of dedicated cemeteries.

Threshold 1 broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, analysis under Threshold 1 has been limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold 2.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation. Removal, demolition, or alteration of historical resources can permanently impact the historic fabric of an archaeological site, structure, or historic district.

The State Legislature, in enacting the CRHR, amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse. A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have significant effect on the environment (*CEQA Guidelines* Section 150645[b]). A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.[11]

The *CEQA Guidelines* further state that "[t]he significance of an historical resource is materially impaired when a project… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its

[10] Fresno County Landmarks. 2025. Accessed June 2025: https://www.fresnolandmarks.com/
[11] California Code of Regulations, Title 14, § 15064.5(b)(1). (2025). Determining the significance of impacts to archaeological and historical resources. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-5/section-15064-5/

inclusion in the California Register … local register of historic resources … or its identification in historic resources survey." As such, the test for determining whether or not the project will have a significant impact on identified historical resources is whether it will materially impair physical integrity of the historic resource such that it could no longer be listed in the CRHR or a local landmark program.

b. Project Impacts and Mitigation Measures

The project includes the rezoning of 20 infill sites, including amendments to the General Plan Land Use designations, in order to facilitate the development of higher density and affordable housing development. The project in and of itself would not result in physical changes to the environment such that impacts to cultural resources would occur, as no physical development is proposed as part of the project. Therefore, this analysis focuses on impacts associated with implementation of the rezoning and land use changes, which would facilitate the development of 20 sites as described in Chapter 2, *Project Description.*

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 DEVELOPMENT FACILITATED BY THE PROJECT COULD IMPACT KNOWN AND PREVIOUSLY UNIDENTIFIED HISTORICAL RESOURCES. IMPACTS TO HISTORICAL RESOURCES WOULD BE SIGNIFICANT AND UNAVOIDABLE.

There are no historical resources located on any of the 20 Infill Rezone Program sites. As identified in Table 4.4-4 below, there are Infill Rezone Program sites that have not been subject to previous historical resources evaluation, but which currently meet the 45-year age threshold generally triggering the need for evaluation. Pending further analysis there is potential for these unevaluated properties to qualify as historical resources pursuant to CEQA. For the purposes of this study, these properties are considered potential historical resources.

Table 4.4-4 Properties Requiring Evaluation

Site ID*	APN	Address	Existing Use	Built Date	Age Eligible	45 Year Threshold
3	49102042	270 W Herndon Ave	Single-family residence; Sports facility; Tree lot	c. 1965	Yes	NA
63	56303207	1933 Alluvial Ave	Single family residence	1971	Yes	NA
72	56008207	437 W Nees Ave	Single family residence	1978	Yes	NA
197	55849230	1497 N Locan Ave	Single family residence	1988	No	2033
217	49954013ST	885 Gettysburg Ave	Clovis Academy of Gymnastics & Dance	c. 1980	Yes	NA
589	55026023	2403 Bullard Ave	Former Rogers Helicopter	c. 1980	Yes	NA
590	55458036S	3959 Shaw Ave	Single-family residence	c. 1965	Yes	NA
592	56303131	1160 N Fowler Ave	Single family residence	1976	Yes	NA
598	49938442	2560 Fowler Ave	Single family residence	1925	Yes	NA
599	49938441	2612 Fowler Ave	Single family residence	1960	Yes	NA

Development facilitated by the proposed project could result in impacts to historical resources through demolition, construction, and reconstruction activities associated with the project. The City of Clovis has adopted General Plan Policies 2.9 and 2.10 to minimize impacts to historical resources, which would apply to future development facilitated by the project. Adherence to these existing policies would not by themselves protect the properties listed in Table 4.4-4 that have not been previously evaluated to determine eligibility as historical resources. Therefore, additional mitigation would be necessary to require evaluation and protection if determined eligible.

Implementation of Mitigation Measures (MMs) CUL-1 and CUL-2, below, would reduce impacts to historical resources to the extent feasible by identifying and evaluating significant historical resources and managing avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards as applicable. Nonetheless, even with implementation of MMs CUL-1 and CUL-2, eligible historical resources could still be materially impaired by future development that would be carried out under the proposed project. It is possible that a future project could result in the demolition or substantial alteration of a historical resource. Therefore, even with mitigation, impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

Mitigation Measures

CUL-1 Identification of Historical Resources

A historical resources evaluation shall be prepared prior to demolition or alteration for properties listed in Table 4.4-4 to evaluate existing structures on site. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed rezone site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the South San Joaquin Valley Information Center. If the property is already a historical resource as defined by *CEQA Guidelines* Section 15064.5(a), the historical resources evaluation described above shall not be required.

CUL-2 Treatment of Historical Resources

If a project would occur on a site containing a historical resource as identified during implementation of MM CUL-1, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance).

Mitigation may include avoidance, preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to

historical resources.[12] A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits.

If historical resources are identified and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, reports similar to Historic American Buildings Survey (HABS), interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.

Significance after Mitigation

Significant and unavoidable.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD ADVERSELY AFFECT IDENTIFIED AND PREVIOUSLY UNIDENTIFIED ARCHAEOLOGICAL RESOURCES. HOWEVER, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

There are no previously recorded archaeological resources in any of the 20 Infill Rezone Program sites. However, one of the sites (Site 157) has been previously surveyed, which took place in 2002. Additionally, seven Infill Rezone Program sites are considered to have moderate to high potential for subsurface archaeological deposits. The absence of previously recorded prehistoric or historic-period archaeological resources within the immediate vicinity of the remaining Infill Rezone Program sites, along with the existing level of disturbance, suggests there is a low potential for encountering intact subsurface archaeological deposits. However, as these sites have not been previously studied, lack of evidence and sensitivity does not preclude the existence of archaeological resources within all 20 Infill Rezone Program sites listed in Table 4.4-5 below.

[12] California Code of Regulations, Title 14, § 15126.4(b)(1). (2025). Consideration and discussion of mitigation measures proposed to minimize significant effects. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-9/section-15126-4/

Table 4.4-5 Properties Requiring an Archaeological Resources Study

Site ID	APN	Address	Moderate-High Potential for Archaeological Resources
3	49102042	270 W Herndon Ave	High
63	56303207	1933 Alluvial Ave	
72	56008207	437 W Nees Ave	
108	49123124	125 & 135 N Clovis Ave	Moderate
110	49906074	236 & 256 W Santa Ana Ave	Moderate
115	55457044S	1671 Leonard Ave	Moderate
157	55803359S	De Wolf & Richmond Ave	High
161	43043316	2930 Willow Ave	Moderate
167	55128004	1871 Shaw Ave	Moderate
168	55128003	1853 Shaw Ave	
197	55849230	1497 N Locan Ave	
217	49954013ST	885 Gettysburg Ave	
589	55026023	2403 Bullard Ave	
590	55458036S	3959 Shaw Ave	
592	56303131	1160 N Fowler Ave	
595	49817202	939 & 947 Sunnyside Ave	
596	49817201	965 & 975 Sunnyside Ave	
597	49817203	925 Sunnyside Ave	
598	49938442	2560 Fowler Ave	
599	49938441	2612 Fowler Ave	

Therefore, future development on any of the 20 Infill Rezone Program sites would have the potential to directly or indirectly impact subsurface archaeological resources through ground disturbing activities associated with construction.

Implementation of MMs CUL-3 and CUL-4 would reduce impacts to archaeological resources to less than significant levels by ensuring the avoidance of archaeological resources to the extent feasible, or by identifying, evaluating, and conducting data recovery archaeological resources that may be impacted by future projects in a timely manner. With implementation of these measures, impacts to archaeological resources would be less than significant.

Mitigation Measures

CUL-3 Archaeological Resources Study

For future projects involving ground disturbance on any of the 20 Infill Rezone Program sites the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the South San Joaquin Valley Information Center, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval.

If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.

CUL-4 Unanticipated Discovery of Archaeological Resources

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

Significance after Mitigation

Less than significant with mitigation.

Threshold 3:	Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact CUL-3 THERE ARE NO GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH THE PROJECT THAT COULD RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN BURIALS. HOWEVER, FUTURE DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE REQUIRED TO ADHERE TO STATE HEALTH AND SAFETY CODE SECTION 7050.5 AND PRC SECTION 5097.98. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

No human remains are known to be present within the project site. However, the discovery of human remains is a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American

origin, the Coroner will notify the NAHC, which will determine and notify a most likely descendent (MLD). The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

Mitigation Measures

No mitigation measures are required.

4.4.4 Cumulative Impacts

It is possible that future cumulative development could potentially disturb areas resulting in impacts to known or unknown historical resources. While impacts to such resources would be addressed on a case-by-case basis and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project, cumulative development may result in direct or indirect impacts to historical resources. As such, cumulative historical impacts would be significant. Development facilitated by the project would adhere to the provisions of the General Plan policies related to historical resources. However, even after implementation of these guidelines, the proposed project would result in a considerable contribution to this cumulative impact.

Buildout of cumulative projects could potentially disturb areas that may contain unknown archaeological resources. While there is the potential for significant cumulative impacts to cultural resources, it is anticipated that potential impacts associated with individual development projects would be addressed on a case-by-case basis. Projects would be subject to City policies and local and State regulations regarding the protection of such resources, and would likely be subject to mitigation measures similar to those imposed for development facilitated by the project. Development facilitated by the project would adhere to existing policies and regulation related to archeological resources. However, even after implementation of these guidelines, the proposed project would result in a considerable contribution to this cumulative impact.

Future projects and cumulative projects in the region would involve ground-disturbing activities which could encounter human remains. If human remains are found, the proposed project and cumulative projects would be required to comply with the State of California Health and Safety Code Section 7050.5, as described in Impact CUL-3, above. With adherence to existing regulations relating to human remains, cumulative impacts would be less than significant, and the proposed project would not result in a considerable contribution to this cumulative impact.

Mitigation Measures

Implement mitigation measures CUL-1, CUL-2, CUL-3, and CUL-4.

Significance after Mitigation

Less than significant with mitigation.

4.5 Energy

This section evaluates impacts to energy, including the potential wasteful, inefficient, or unnecessary consumption of energy, associated with development facilitated by the proposed project. For impacts related to air quality, see Section 4.2, *Air Quality*, and for impacts related to greenhouse gas (GHG) emissions and climate change, see Section 4.6, *Greenhouse Gas Emissions.*

4.5.1 Setting

Energy relates directly to environmental quality, as energy usage can adversely affect air quality and other natural resources. Fossil fuels are burned in order to create electricity that powers homes and vehicles. Transportation energy usage relates to the fuel efficiency of cars and trucks, the availability and use of public transportation, miles traveled and the choice of different travel modes, including auto, carpool, and public transit. Construction and routine operation and maintenance of infrastructure also consumes energy, typically in the form of natural gas and electricity.

Energy Supply

Impacts to energy resources are directly related to petroleum, natural gas, coal, nuclear, thermal, solar, hydroelectric, biodiesel, ethanol and other sources of energy that could be consumed resulting from development facilitated by the proposed project.

Energy Consumption and Sources

Total energy consumption in the United States (U.S.) in 2023 was approximately 93.58 quadrillion British thermal unit (Btu).[1] In 2023, petroleum provided approximately 38 percent of that energy and natural gas provided approximately 36 percent. Other sources of energy included coal (approximately nine percent), renewable sources (approximately nine percent), and nuclear power (approximately nine percent). On a per capita basis in 2022, California was ranked the third lowest (i.e., most energy efficient) state in terms of total energy consumption (176 million Btu [MMBtu] per person), or about 47 percent less than the U.S. average per capita consumption of 332 MMBtu per person.[2]

Electricity

In 2022, California generated approximately 215,625 gigawatt-hours (GWh) of electricity in-state. The primary fuel sources included natural gas, hydroelectric, solar photovoltaic, wind, nuclear, geothermal, biomass, and solar thermal. According to the California Energy Commission (CEC), the state's electricity mix is increasingly reliant on solar energy, with photovoltaic systems producing over 39,422 GWh in 2023.[3] Fresno County consumed approximately 7,414 GWh of electricity in 2023 from residential and non-residential uses.[4]

Table 4.5-1 illustrates the County's 2023 electricity consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its

[1]U.S. Energy Information Administration (EIA) 2023. Accessed June 2025: https://www.eia.gov/state/seds/seds-data-complete.php
[2] Ibid. 2022. Accessed June 2025: https://www.eia.gov/state/rankings/
[3] California Energy Commission (CEC). 2024. Accessed June 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0
[4] Ibid., 2023. Accessed June 2025: http://www.ecdms.energy.ca.gov/elecbycounty.aspx

electricity demand. With a population of 1,015,633 in 2023[5], Fresno County's 2023 per capita electricity consumption was approximately 7,297 kWh, or approximately 25 MMBtu (0.74 MMBtu more than the State per capita average).

Table 4.5-1 2023 Annual Electricity Consumption

Energy Type	Fresno County (GWh)	California (GWh)	Proportion of Statewide Consumption	County per Capita Consumption (kWh)	County per Capita Consumption (MMBtu)
Electricity	7,414	276,213	2.68%	7,297	25

Sources: California Energy Commission, 2023; and Department of Finance 2023

The primary electricity provider serving the City of Clovis is Pacific Gas and Electric (PG&E). PG&E is responsible for the distribution of electricity and is also the natural gas provider for the City. As of 2022, PG&E delivered electricity that was approximately 95% GHG emissions-free, with nearly 40 percent sourced from eligible renewable resources such as solar, wind, geothermal, biomass, and small hydroelectric power.[6] In conjunction with the utility companies, including PG&E, the California Public Utilities Commission (CPUC) oversees and promotes a wide range of energy conservation programs throughout the state.

CPUC and the CEC are responsible for assessing population growth, electricity demand, and reliability in the state. The CEC conducts assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices. The CEC uses these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.[7]

Power plants that provide electricity for PG&E are required to go through individual environmental review processes, which may be through the CEC's certified regulatory program under the California Environmental Quality Act (CEQA), or through the CPUC's CEQA processes. The CEC is continuously tracking potential projects 50 megawatt (MW) and larger.[8] Similarly, the CPUC conducts and manages environmental review of infrastructure projects, including electric, gas, water, and telecommunications.[9]

Natural Gas

Nationally, natural gas-fired generation has dominated electricity production in the U.S. for many years. In 2023, the two largest sources of energy production were from natural gas and petroleum (including crude oil); the U.S. produced 39.12 quadrillion Btu of natural gas and 34.96 quadrillion Btu of crude oil.[10] Natural gas supplies nearly one-third of California's total energy demand and is used across a range of applications, including electricity generation, space and water heating,

[5] California Department of Finance (DOF). Population Estimates for Cities, Counties, and the State 2021-2025. 2023. Accessed June 2025: https://dof.ca.gov/Forecasting/Demographics/Estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2025-with-2020-census-benchmark/
[6] PG&E. 2022. Accessed June 2025: https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html
[7] California Public Resources Code Section 25301[a]). Accessed June 2025: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=25301
[8] CEC., 2023.).
[9] Ibid., 2022.
[10] Energy Information Administration (EIA). 2023. Accessed May 2025: https://www.eia.gov/energyexplained/us-energy-facts/data-and-statistics.php

cooking, industrial processes, and as a transportation fuel. It is measured in cubic feet (cf). California relies on out-of-state natural gas imports for nearly 90 percent of its natural gas supply.[11]

Fresno County as a whole consumed approximately 340 million therms of natural gas in 2023 in both residential and non-residential uses.[12] Table 4.5-2 illustrates the County's 2023 natural gas consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its natural gas demand. With a population of 1,015,633 in 2023[13], Fresno County's 2023 per capita natural gas consumption was approximately 335 therms, or approximately 33 MMBtu (approximately 2.98 MMBtu more per capita than the state average).

Table 4.5-2 2023 Annual Natural Gas Consumption

Energy Type	Fresno County (Millions of U.S. therms)	California (Millions of U.S. therms)	Proportion of Statewide Consumption	County per Capita Consumption (U.S. therms)	County per Capita Consumption (MMBtu)
Natural Gas	340	11,964	2.8%	335	33

Source: CEC, 2025; and DOF, 2023.

The City of Clovis is located within PG&E's natural gas service area, which spans central and northern California. In 2023, PG&E customers consumed a total of 4.7 billion therms of natural gas. Residential users accounted for approximately 43 percent of PG&E's natural gas consumption. Industrial and commercial users accounted for another 30 percent and 20 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts.[14]

The 2024 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2040. The report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with CPUC Decision D.95-01-039. The projections contained in the California Gas Report are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities.[15]

California natural gas demand is expected to decrease at a rate of 2.0 percent per year from 2024 to 2040. The forecasted decline is largely due to moderate growth in the natural gas vehicle market and across-the-board declines in all other market segments, including residential, commercial, electric generation, and industrial. Residential gas demand is expected to decrease at an annual average rate of 7.6 percent.[16] Demand in the commercial and industrial markets are expected to decrease at an annual rate of 2.9 percent and 0.5 percent, respectively. Stricter regulations and standards coupled with more aggressive energy efficiency are making a significant impact on the forecasted load for the residential, commercial, and industrial markets.

Gas-fired generation will remain a key resource for meeting demand and supporting the variability of renewable energy sources. Nevertheless, statewide gas demand for electric generation is

[11] Ibid., 2023.
[12] Ibid. 2022. Accessed May 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1
[13] Department of Finance (DOF). 2023. Accessed May 2025: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2025-with-2020-census-benchmark/
[14] CEC. 2023. Accessed May 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1
[15] California Gas and Electric Utilities (CGEU) 2024. Accessed June 2025: https://www.pge.com/pipeline/en/reference-library/regulatory/cgr.html
[16] Ibid.

projected to decline by approximately 1.1 percent annually through 2040.[17] This trend reflects the increasing efficiency of power plants, California's commitment to reducing GHG emissions, and the growing adoption of low- or zero-carbon energy resources. For more details on PG&E's gas supply and capacity outlook, refer to the 2024 California Gas Report.[18]

Transportation Energy

Energy consumed by the transportation sector accounts for roughly 42 percent of California's energy demand, which amounted to approximately 3,056 trillion Btu in 2023.[19] Approximately 96 percent of the State's transportation activity uses petroleum based fuels.[20] California's transportation sector, including on-road and rail transportation, consumed approximately 2,974 trillion Btus of petroleum fuels in 2023.[21] California refines nine percent of the total crude oil in the U.S.; third in quantity following Texas and Louisiana.[22] Gasoline and diesel fuel sold in California for motor vehicles and refined in California is required to meet state-specific formulations required by the California Air Resources Board (CARB).[23]

As shown in Table 4.5-3, an estimated 453 million gallons of fuel were sold at transportation fuel stations in Fresno County in 2023, of which approximately 372 million gallons were gasoline and approximately 81 million gallons were diesel fuel.[24] Using CEC estimates on fuel sales and a Department of Finance (DOF) 2023 population estimate of 1,015,653,[25] the County's annual per capita fuel consumption in 2023 can be estimated at 366 gallons of gasoline and 80 gallons of diesel fuel per person.

Table 4.5-3 2023 Annual Gasoline and Diesel Sales Estimates

Fuel Type	Fresno County (million gallons)	California (million gallons)	Proportion of Statewide Sales	County per Capita Annual Consumption Estimates (gallons)
Gasoline	372	13,576	2.7%	366
Diesel	81	2,316	3.4%	80
Total	**453**	**15,892**	**–**	**446**

Source: CEC, 2023; and DOF, 2023.

[17] Ibid.
[18] Ibid.
[19] U.S. Energy Information Administration (EIA). 2023. Accessed June 2025: https://www.eia.gov/state/analysis.php?sid=CA
[20] Ibid.
[21] Ibid.
[22] Ibid.
[23] California Air Resources Board (CARB). 2025. Accessible at: https://ww2.arb.ca.gov/our-work/programs/fuels-enforcment-program/california-reformulated-gasoline
[24] CEC. 2023. Accessed May 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1
[25] Department of Finance (DOF). 2023. Accessed May 2025: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2025-with-2020-census-benchmark/

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard and Health and Safety Code Section 38566 [Senate Bill (SB) 32]). Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with many alternative fuels including the following:

- **Hydrogen.** Hydrogen is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential for domestic production, and the fuel cell vehicle's potential for high efficiency (two to three times more efficient than gasoline vehicles). As of 2025, there were 53 open hydrogen refueling stations in California. None are in the City of Clovis, the closest being in the City of Coalinga at 24505 West Dorris Avenue, approximately 60 miles southeast of Clovis.[26]
- **Biodiesel.** Biodiesel is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant greases. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Biodiesel can run in any diesel engine generally without alterations but fueling stations have been slow to make it available. There are 30 biodiesel refueling stations in California; the nearest biodiesel fueling station to Clovis is located at 3175 Avenue 17, approximately 35 miles from Clovis in Madera, California.[27]
- **Electricity.** Electricity can be used to power electric and plug-in hybrid electric vehicles directly from the power grid. The electricity grid usually provides electricity used to power vehicles, which store it in the vehicle's batteries. Electrical charging stations are available throughout Fresno County and in the City of Clovis. The City of Clovis has 139 public charging stations, three of which are free EV charging stations and 25 are DC Fast Chargers.[28]

Energy and Fuel Efficiency

As a state, California is one of the lowest per capita energy users in the U.S., ranked 49th in the nation, due to its energy efficiency programs and mild climates.[29] Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, fireplaces, and other uses such as industrial processes and transportation. Though the demand for gasoline and diesel fuel is rising because of population growth and limited mass transit, the increase in demand can be offset partially by efficiency improvements and standards. Land use policies that encourage infill and growth near transit centers (e.g., following SB 375, the Sustainable Communities and Climate Protection Act of 2008), as well as improvements to fuel efficiency, and gradual replacement of the vehicle fleet with new, more fuel-efficient and alternative fuel as well as electric cars, will all reduce petroleum fuel use.

[26]California Fuel Cell Partnership 2025 Accessed May 2025: https://h2fcp.org/stationmap
[27] Alternative Fuels Data Center. U.S. Department of Energy. 2025. Accessed May 2025: https://afdc.energy.gov/stations#/find/nearest?country=US&fuel=BD&location=california
[28] PlugShare 2025. Accessed May 2025: https://www.plugshare.com/directory/us/california/clovis
[29] United States Energy Information Administration (EIA). 2024. Accessed June 2025: https://www.eia.gov/state/rankings/

4.5.2 Regulatory Setting

a. Federal Regulations

Energy Independence and Security Act of 2007

The Energy Independence and Security Act is designed to improve vehicle fuel economy and help reduce U.S. dependence on foreign oil. The Act aims to expand the production of renewable fuels, reduce dependence on oil, and confront global climate change. Specifically, it does the following:

1. Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022, which represents a nearly five-fold increase over previous levels; and
2. Reduces U.S. demand for oil by setting a national vehicle fuel economy standard of 35 miles per gallon by 2020 – a 40 percent increase in fuel economy standards over those in 2007.

Corporate Average Fuel Economy Standards

The Energy Policy and Conservation Act of 1975 established the Corporate Average Fuel Economy Standards (CAFE standards). The CAFE standards are federal rules established by the National Highway Traffic Safety Administration (NHTSA) that set fuel economy standards for new passenger cars and light trucks sold in the U.S.. The CAFE standards have become increasingly stringent, with the combined industry-wide fleet for the model year 2020 required to achieve an estimated average of 38.3 miles per gallon.[30]

In September 2019, the U.S. Environmental Protection Agency (EPA) and the NHTSA issued the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, Part One "One National Program" (84 FR 51310). This rule revoked a waiver previously granted by the EPA to the State of California under Section 209 of the Clean Air Act, which had allowed California to enforce more stringent GHG emission standards for motor vehicles than those required at the federal level. This revocation became effective on November 26, 2019, and could have restricted the ability of the CARB to enforce more stringent GHG emission standards for new vehicles and set zero-emission vehicle mandates in California. However, on December 21, 2021, the NHTSA published its CAFE Preemption rule, which finalizes its repeal of 2019's SAFE Rule, Part One.

Part Two of the SAFE Vehicles Rule addresses CAFE standards for passenger cars and light trucks for model years 2024 to 2031. The CAFE standards require an industry-wide fleet average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026. The new standards increase fuel efficiency by eight percent annually for model years 2024 to 2025 and by 10 percent annually for model year 2026. They also increase the estimated fleetwide average by nearly 10 mpg for model year 2026, relative to model year 2021. Additionally, under this rule, the fuel economy will increase two percent per year for model years 2027 to 2031 for passenger cars, while light trucks will increase two percent per year for model years 2029 to 2031. These increases aim to bring the average light-duty vehicle fuel economy up to approximately 50.4 mpg by model year 2031.

[30] Environmental Protection Agency & National Highway Traffic Safety Administration. 2012.77 Federal Register [FR] 62624 et seq. October 15, 2012, Table I-1. Accessed July 2025: https://www.govinfo.gov/content/pkg/FR-2012-10-15/pdf/2012-21972.pd

Energy Star Program

Energy Star is a voluntary labeling program introduced by the U.S. EPA to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, certified appliances that meet specifications for maximum energy use established under the program display the Energy Star label. In 1996, the U.S. EPA joined the Energy Department to expand the program to include the certification of commercial, industrial, and residential buildings.

Construction Equipment Fuel Efficiency Standard

The U.S. EPA sets emission standards for construction equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements contained in Title 40 of the Code of Federal Regulations (CFR) Parts 1039, 1065, and 1068. Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

b. State Regulations

California Energy Plan

The 1975 Warren-Alquist Act established what is now known as the CEC. The CEC is responsible for preparing the California Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The California Energy Plan requires the State to assist in transforming the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies in an energy efficient manner. The plan identifies strategies to reduce vehicle miles traveled (VMT), such as providing assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles, addressing infrastructure needs and encouragement of urban designs that accommodate pedestrian and bicycle access.

Assembly Bill 2076: Reducing Dependence on Petroleum

Pursuant to Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000; codified as Public Resources Code Sections 25720-25721), the CEC and CARB prepared and adopted in 2003 a joint agency report, entitled *Reducing California's Petroleum Dependence*. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030; significantly increase the efficiency of motor vehicles; and reduce per capita VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand 15 percent below the 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy reports, the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

Senate Bill 100: California Renewable Energy Portfolio Standard Program: Emissions of Greenhouse Gases

Approved by the Governor on September 10, 2018, SB 100 amends the State's Renewables Portfolio Standard (RPS) program, which originally called for electricity retailers to ensure 33 percent of electricity generation was sourced from renewable sources by 2020, 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. With implementation of SB 100, electricity retailers must ensure

33 percent of electricity generation is sourced from renewable sources by 2020, 44 percent by 2024, 50 percent by 2026, 52 percent by 2027, and 60 percent by 2030. SB 100 further requires electricity retailers to provide 100 percent zero-carbon electricity generation by 2045.

Integrated Energy Policy Report

SB 1389 (Chapter 568, Statutes of 2002) requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and price to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety. The 2022 Integrated Energy Policy Report, adopted in February 2023, highlights the implementation of California's policies and the role they have played in establishing a clean energy economy. The Integrated Energy Policy Report contains recommendations on energy usage policies such as decarbonizing buildings, energy efficiency savings, increasing flexibility in the electrical system to integrate more renewable energy and improve energy reliability, and reducing gasoline and diesel use in cars and trucks by up to 50 percent. [31]

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act (SB 350), signed into law on October 7, 2015, advances California's climate and energy goals by implementing key provisions of Executive Order B-30-15. The bill establishes a statewide target to reduce GHG emissions to 40 percent below 1990 levels by 2030. To achieve this, SB 350 mandates that 50 percent of electricity sold to retail customers must come from eligible renewable energy resources by December 31, 2030. Additionally, it requires a doubling of energy efficiency savings in electricity and natural gas end uses through increased conservation and efficiency measures by December 31, 2030. The latest statewide GHG emissions target and procurement of electricity from renewable sources is discussed under SB 1020 below.

Assembly Bill 1493: Reduction of Greenhouse Gas Emissions

AB 1493 (Chapter 200, Statutes of 2002), known as the "Pavley bill," amended Health and Safety Code sections 42823 and 43018.5 and requires CARB to develop and adopt regulations to achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other noncommercial personal transportation vehicles in California.

Implementation of new regulations prescribed by AB 1493 required the State of California to apply for a waiver under the federal Clean Air Act. Although the U.S. EPA initially denied the waiver in 2008, U.S. EPA approved a waiver in June 2009, and in September 2009, CARB approved amendments to its initially adopted regulations to apply the Pavley standards that reduce GHG emissions to new passenger vehicles in model years 2009 through 2016. According to CARB, implementation of the Pavley regulations is expected to reduce fuel consumption while also reducing GHG emissions.[32]

Energy Action Plan

In the October 2005 *Energy Action Plan (EAP) II*, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as

[31] CEC. 2022 Integrated Energy Policy Report Update. 2023. Accessed June 2025: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2022-integrated-energy-policy-report
[32] Ibid.

the emerging importance of climate change, transportation-related energy issues and research, and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the State's ongoing actions in the context of global climate change.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative, nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Senate Bill 1020: Clean Energy, Jobs, and Affordability Act

Originally established under SB 1078 (2002) and strengthened by subsequent legislation including SB 107 (2006), SB X1-2 (2011), and SB 100 (2018), California's RPS was further advanced by SB 1020. This legislation sets interim targets for achieving 100 percent clean electricity statewide by 2045. Specifically, it requires that eligible renewable and zero-carbon energy resources supply 90 percent of retail electricity sales by 2035, 95 percent by 2040, and 100 percent by 2045. Additionally, it mandates that all electricity procured to serve state agencies must come from 100 percent clean sources by 2035. SB 1020 was signed into law in 2022, and supersedes SB 350 targets, which had aimed for 50 percent renewable electricity by 2030. The CPUC and the CEC, in coordination with the CARB, are jointly responsible for implementing and overseeing the program.

Bioenergy Action Plan, Executive Order S-06-06

Executive Order (EO) S-06-06, April 25, 2006, establishes targets for the use and production of biofuels and biopower, and directs State agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. EO S-06-06 also calls for the State to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so that the State can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

1. Increase environmentally and economically sustainable energy production from organic waste.
2. Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications.
3. Create jobs and stimulate economic development, especially in rural regions of the State.
4. Reduce fire danger, improve air and water quality, and reduce waste.

California Code of Regulations (CCR)

CCR Title 24, Building Energy Efficiency Standards

CCR, Title 24, Part 6, is California's energy efficiency standards for residential and nonresidential buildings. The CEC established Title 24 in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. The standards are updated on an approximately three-year cycle to allow consideration and possible incorporation of new efficient technologies and methods. In 2019, the CEC updated Title 24 standards with more stringent requirements effective January 1, 2020. All buildings for which an application for a building permit is submitted on or after January 1, 2020, must follow the 2019 standards. Energy-efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases GHG emissions. The CEC Impact Analysis estimates that nonresidential buildings will be 30 percent more energy efficient compared to buildings built consistent with 2016 Building Energy Efficiency Standards, and single-family homes will be seven percent more energy efficient. Due to the solar requirement for all new homes, the CEC also estimates that the 2019 standards will cut energy demand from grid electricity in new homes by more than 50 percent. The building efficiency standards are enforced through the local plan check and building permit process. Local government agencies may adopt and enforce additional energy standards for new buildings as reasonably necessary due to local climatologic, geologic, or topographic conditions, provided these standards exceed those provided in Title 24.

The City of Clovis has adopted the 2022 California Building Code (Title 24 Building Standards) in Chapter 8.1 of the CMC. CMC Chapter 8.16 and 8.17 adopts the 2022 California Energy Code and California Green Building Standards Code, respectively, establishing statewide standards for energy efficiency in building design, construction, and system. This includes requirements on insulation, lighting, heating, ventilation and air conditioning, as well as renewable energy readiness.

California Green Building Standards Code (2019), CCR Title 24, Part 11

California's green building code (CALGreen) was developed to provide a consistent approach to green building within the State. CALGreen lays out the minimum requirements for newly constructed residential and nonresidential buildings to reduce GHG emissions through improved efficiency and process improvements. The requirements pertain to energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and reductions to internal air contaminants. It also includes voluntary tiers to further encourage building practices that improve public health, safety, and general welfare by promoting a more sustainable design.

CCR Title 13, Sections 2449 and 2485

Sections 2449 and 2485 are separate but related regulations in the CCRs that aim to reduce emissions associated with off-road diesel vehicles. Section 2449 contains the In-Use Off-Road Diesel-Fueled Fleets Regulations, which are intended to reduce emissions of nitrogen oxides and diesel particulate matter. Section 2485 is an Airborne Toxic Control Measure that limits idling of certain diesel-fueled vehicles for more than five minutes.

California's 2020 Integrated Energy Policy Report

Every two years, the CEC prepares the Integrated Energy Policy Report (IEPR). The IEPR identifies actions the state and others can take to ensure a clean, affordable, and reliable energy system. California's innovative energy policies strengthen energy resiliency, reduce GHG emissions, improve air quality, and contribute to an equitable future. Volume II of the 2020 IEPR examines microgrids, lessons learned from a decade of state-supported research, and stakeholder feedback on the potential of microgrids to contribute to a clean and resilient energy system. Volume III reports California's energy-demand outlook, updated to reflect the global pandemic and plan for a growth in zero-emission plug in electric vehicles.

c. Local Regulations

Clovis General Plan 2014

The City has several policies in place to reduce energy consumption from area sources and promote renewable energy. Open Space and Conservation Element policies include:

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

Clovis Municipal Code

Chapter 8.1 of the Clovis Municipal Code (CMC) adopts and amends the latest version of the California Building Code.

Chapter 9.110 of the CMC introduces energy conservation regulations for parcel configurations, site design and layout for heating and cooling.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

No physical development is proposed as part of the project, however, as a result of the rezoning an assumed additional 1,303 housing units could be accommodated, with the maximum amount of 1,651 units. The physical environmental impacts associated with the use of energy, including the generation of electricity and burning of fuels, are discussed in Section 4.2, *Air Quality*, and Section 4.6, *Greenhouse Gas Emissions*. Energy consumption is analyzed herein in terms of construction and operational energy.

Construction energy demand for the development facilitated by the project is evaluated qualitatively because project-specific information regarding construction is unavailable for individual development projects facilitated by the proposed project. Construction energy demand accounts for anticipated energy consumption during construction of development facilitated by the proposed

project, such as fuel consumed by construction equipment and construction workers' vehicles traveling to and from the construction site. These construction activities would temporarily create a higher demand for energy supplies. The extent of energy use generated by construction equipment would depend on the quantity of equipment used and the hours of operation for each project.

Operational energy demand accounts for the anticipated energy consumption from development facilitated by the project, such as fuel consumed by cars, trucks, and public transit; natural gas consumed for on-site power generation and heating building spaces; and electricity consumed for building power needs, including, but not limited to, lighting, water conveyance, and air conditioning. Operational natural gas and electricity consumption from development facilitated by the proposed project wase approximated using the California Emissions Estimator Model (CalEEMod) version 2022.1. This analysis then determined whether energy consumed during operation for full buildout (maximum allowable density of 1,651 housing units) facilitated by the project would be wasteful, inefficient, or unnecessary. Daily natural gas and electricity consumption for development facilitated by the project is detailed in Sections 4.2, *Air Quality* and 4.6, *Greenhouse Gas Emissions*. The estimate of total daily VMT associated with the proposed project is based on VMT data provided in Section 4.13, *Transportation*.

Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines,* a significant energy impact would occur if new development facilitated by the proposed project would:

1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or
2. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

b. Project Impacts and Mitigation Measures

The project involves land use designation changes and rezoning of 20 Infill Rezone Program sites throughout the City to allow higher densities. These changes would not result in direct physical changes to the environment such that impacts related to energy would occur. However, the land use designation changes along with the rezoning would facilitate the development of up to 1,651 units with an assumed development potential of 1,303 units. Therefore, analysis focuses on impacts associated with the potential additional development on the identified lots throughout the City of Clovis.

Threshold 1:	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?

Impact E-1 FUTURE DEVELOPMENT FACILITATED BY THE PROJECT WOULD CONSUME ENERGY, BUT MORE EFFICIENTLY THAN WITH CURRENT ZONING DUE TO THE HIGHER DENSITY OF DEVELOPMENT, AND WOULD NOT RESULT IN THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project does not involve any physical development, however, energy resources consumed by construction and operation of development facilitated by the rezoning aspect of the project would be primarily reliant on petroleum fuels. Gasoline, which is used by light-duty cars, pickup trucks, and

other vehicles, is the most used transportation fuel.[33] Diesel is used primarily by freight trucks, trains, buses, boats, barges, farm equipment, and military vehicles.[34]

Construction Energy Consumption

The project does not propose any physical construction; however, the rezoning of 20 sites would facilitate future development at densities higher than previously allowed. Energy use during project construction would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and construction worker travel to and from the project site. Energy use would be typical of similar-sized construction projects in the region. Furthermore, development facilitated by the project would utilize licensed construction contractors who demonstrate compliance with the provisions of the CCR Title 13 Sections 2449 and 2485. Statewide regulations restrict the idling of heavy-duty diesel vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment and require certification of construction equipment and periodic site inspection. Further, for both environmental awareness and cost efficiency, construction contractors are unlikely to utilize fuel in a manner that is wasteful or unnecessary. As such, future development on the Infill Rezone Program sites would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction. This impact would be less than significant.

Operational Energy Consumption

Development facilitated by the project would be at higher densities than might have occurred under previous zoning and land use designations. Therefore, operation of future projects could consume more electricity. However, future development would be subject to the energy conservation requirements of the California Energy Code (CCR Title 24, Part 6, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CCR Title 24, Part 11). The California Energy Code establishes mandatory energy efficiency standards for newly constructed and renovated residential and non-residential buildings throughout the state. These standards apply to various building components, including the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings, and appliances. It also provides guidance on construction techniques to maximize operational energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The California Energy Code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. The California Green Building Standards Code sets targets for energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. Additionally, rezoning to allow for higher density development would reduce energy consumption generally, as households in more compact neighborhoods consume significantly less energy than those in lower density, car-dependent areas due to smaller unit sizes, shared walls for lower heating and cooling demands, and more efficient infrastructure on the site.[35]

[33] EIA. 2022. Accessed June 2025: https://www.eia.gov/energyexplained/use-of-energy/transportation.php
[34] Ibid. 2023. Accessed June 2025: https://www.eia.gov/energyexplained/diesel-fuel/use-of-diesel.php
[35] Location Efficiency and Housing Type. U.S. Environmental Protection Agency 2011.Accessed May 2025: https://www.epa.gov/sites/default/files/2014-03/documents/location_efficiency_btu.pdf

CalEEMod analysis on whether the energy consumed during operation for the maximum allowable density of 1,651 housing units that would be facilitated by the project was not determined to be wasteful, inefficient, or unnecessary.

Operation of future projects facilitated by the rezoning project would not result in wasteful, inefficient, or unnecessary consumption of energy resources; therefore, impacts on operational energy consumption as a result of the project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-2 THE PROJECT DOES NOT CONFLICT WITH ANY STATE OR LOCAL PLANS FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

No physical development is proposed as part of the project. As described above, any development facilitated by the project would be required to adhere to the CCR Title 24, Part 6 which sets requirements for California's Energy Efficiency Standards for residential and non-residential buildings. As such, future development would adhere to design standards that govern indoor/outdoor lighting, mechanical systems, solar, and electrical power distribution, among other features.

In addition to the California Building Code, new development facilitated by the project would be subject to Clovis General Plan policies to reduce energy consumption from area sources and promote renewable energy.

Table 4.5-4 outlines the project consistency with state renewable energy and energy efficiency plans.

Table 4.5-4 Consistency with State Renewable Energy and Energy Efficiency Plans

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
California Energy Plan. The plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, as well as encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.	**Consistent**. The proposed rezoning of 20 Infill Rezone Program sites throughout the City would facilitate higher-density development in existing urban areas. These infill locations are generally well-served by existing infrastructure and transit. Development facilitated by the project would ultimately encourage urban design that reduces VMT and accommodates pedestrian and bicycle access. Therefore, the project would not conflict with or obstruct implementation of the California Energy Plan.
AB 2076: Reducing Dependence on Petroleum. Pursuant to AB 2076, the CEC and CARB prepared and adopted a joint-agency report, *Reducing California's Petroleum Dependence,* in 2003. Included in this report are recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030, significantly increase the efficiency of motor vehicles, and reduce per capita	**Consistent.** The Infill Rezone Program would support increased development density in existing urban areas, which can reduce per capita VMT by encouraging proximity between housing, jobs, and services. By facilitating development in areas already served by infrastructure and transit, the project would indirectly support reduced petroleum consumption and vehicle efficiency goals. Therefore, the project would not conflict with or obstruct implementation of AB 2076 and *Reducing California's Petroleum Dependence.*

Renewable Energy or Energy Efficiency Plan	Proposed Project Consistency
VMT. One of the performance-based goals of AB 2076 is to reduce petroleum demand to 15 percent below 2003 demand.	
2018 Integrated Energy Policy Report. Volume I highlights the implementation of California's innovative policies and the role they have played in establishing a clean energy economy. Volume II provides more detail on several key energy policies, including decarbonizing buildings, increasing energy efficiency savings, and integrating more renewable energy into the electricity system.	**Consistent.** The proposed rezoning of 20 Infill Rezone Program sites would facilitate future development subject to the City's General Plan policies, as well as the adopted Title 24 standards, which includes requirements for energy efficiency upgrades, improved insulation, renewable energy integration, and the use of electric appliances. By enabling development in areas already served by infrastructure, the project supports efficient energy use and decarbonization of buildings. Therefore, the project would not conflict with or obstruct implementation of the 2018 Integrated Energy Policy Report.
AB 1493: Reduction of Greenhouse Gas Emissions. AB 1493 requires CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.	**Consistent.** The Infill Rezone Program would support compact development patterns in existing urban areas, which can reduce per capita VMT by encouraging proximity between housing, jobs, and services. Facilitating development in areas already served by infrastructure and transit, the project would indirectly support reduced petroleum consumption and vehicle efficiency goals. Therefore, the project would not conflict with or obstruct AB 1493.
Energy Action Plan. In October 2005, the CEC and CPUC updated their energy policy vision by adding some important dimensions to the policy areas included in the original EAP, such as the emerging importance of climate change, transportation-related energy issues, and research and development activities. The CEC adopted an update to the EAP II in February 2008 that supplements the earlier EAPs and examines the state's ongoing actions in the context of global climate change. The nine major action areas in the EAP include energy efficiency, demand response, renewable energy, electricity adequacy/reliability/infrastructure, electricity market structure, natural gas supply/demand/infrastructure, transportation fuels supply/demand/infrastructure, research/development/demonstration, and climate change.	**Consistent.** As described above, new development would be subject to the City's General Plan and Building Code, which adopts Title 24 standards, and would include energy efficiency upgrades such as improved insulation, renewable energy upgrades, and use of electric appliances. Furthermore, the Infill Rezone Program would facilitate development in existing urban areas, which can help reduce greenhouse gas emissions by supporting shorter travel distances and increased access to transit, walking, and biking infrastructure. Therefore, the Infill Rezone Program would not conflict with or obstruct implementation of the EAP.
Bioenergy Action Plan, Executive Order S-06-06. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050.	**Consistent**. The Infill Rezone Program would not interfere with or obstruct the production of biofuels in California. Vehicles used by future residents would be fueled by gasoline and diesel fuels blended with ethanol and biodiesel fuels as required by CARB regulations. Therefore, the project would not conflict with or obstruct implementation of the Bioenergy Action Plan or the State Alternative Fuels Plan.

CARB = California Air Resources Board; CEC = California Energy Commission; EO = executive order; GHG = greenhouse gas emissions; VMT = vehicle miles traveled

Development anticipated to occur on the Infill Rezone Program sites are required to be consistent with Clovis General Plan policies related to the reduction of energy consumption from area sources and promotion of renewable energy. These policies are also consistent with state renewable energy and energy efficiency plans. Additionally, as shown in Table 4.5-4, given compliance with policies included in the Clovis General Plan and Municipal Code, construction and operation of future development facilitated by the project would not conflict with a local or state renewable-energy and energy-efficiency plans.

With regard to transportation related energy usage, the project would not conflict with the goals of FCOGs 2026 RTP/SCS. Any future building on the 20 Infill Rezone Program sites would be infill development which would reduce fossil fuel use by decreasing VMT and increase energy efficiency compared to lower density uses through shared walls and more efficient infrastructure on the site. A more detailed discussion on GHG impacts is included in Section 4.6, *Greenhouse Gas Emissions*.

Therefore, the rezoning of the 20 Infill Rezone Program sites does not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and this impact would be less than significant, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

4.5.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if 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" (*CEQA Guidelines* Section 15065[a][3]). The geographic scope for energy consumption is the City of Clovis. This geographic scope is appropriate because the smallest scale at which energy consumption information is readily available is at the city level.

Cumulative development in Clovis and throughout the region would continue to increase concurrently; however, projects throughout California are required to adhere to applicable renewable energy and energy efficiency laws, programs, and policies such as California's RPS, AB 2076, and Title 24 standards. All other pending and future projects in the City would be required to adhere to Clovis General Plan policies, CMC, and Title 24 building standards to address energy efficiency and mitigate adverse energy impacts where feasible.

Cumulative development would increase demand for energy resources, but those resources would not be consumed in a wasteful, inefficient, or unnecessary manner. However, new iterations of the California Building Energy Efficiency Standards and CALGreen would require increasingly more efficient appliances, building construction techniques, and building materials that reduce energy consumption in new development. In addition, vehicle fuel efficiency is anticipated to continue to improve through implementation of the existing Pavley Bill regulations under AB 1493.

Development facilitated by the project would not result in a wasteful, inefficient, or unnecessary consumption of energy. The operation of the new residential, public, and recreational structures and facilities would not result in potentially significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy as discussed above. Therefore, the project would not make a cumulatively considerable contribution to a significant cumulative impact.

Future housing development as a result of the Infill Rezone Program would be located in proximity to jobs, services, and transit, which would reduce the usage of single-occupancy vehicles and lower projected VMT. Therefore, the project's contribution to a significant cumulative energy impact is not cumulatively considerable.

Overall, development facilitated by the project would be consistent with the energy-related goals, policies, and actions of the statewide plans, Title 24 building standards, and the City's General Plan policies; therefore, the project would not make a cumulatively considerable contribution to a significant adverse cumulative impact with respect to consistency with renewable energy and energy efficiency plans.

Mitigation Measures

No mitigation measures are required.

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4.6 Greenhouse Gas Emissions

This section analyzes the project's potential impacts related to greenhouse gas (GHG) emissions, including the potential for the proposed project to generate GHG emissions in excess of standards or to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, associated with the proposed project.

4.6.1 Setting

GHG emissions and climate change are a cumulative global issue. The United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) regulate GHG emissions within the United States and the State of California, respectively. While CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emissions reduction. CARB has divided California into regional air basins. The project is in Fresno County, which is within the San Joaquin Valley Air Basin (SJVAB) and under the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD).

a. Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature, rainfall, and other weather conditions, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming over the past 150 years. The United Nations Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric carbon dioxide (CO_2) concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented acceleration rate in the last 2,000 years. It is estimated that between the period of 1850 through 2019, that a total of 2,390 gigatonnes of anthropogenic (manmade) CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2021). Furthermore, since the late 1700s, estimated concentrations of CO_2, methane, and nitrous oxide in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity (U.S. EPA 2021a). Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of

GHGs because it is short-lived in the atmosphere, and natural processes, such as oceanic evaporation, largely determine its atmospheric concentrations.

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (U.S. EPA 2021a).

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted. This is referred to as "carbon dioxide equivalent" (CO_2e) and is defined as the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis.[1]

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 91 degrees Fahrenheit (°F) cooler.[2]

b. Greenhouse Gas Emissions Inventories

Global Emissions Inventory

In 2015, worldwide anthropogenic GHG emissions totaled 47,000 million metric tons (MMT) of CO_2e, which is a 43 percent increase from 1990 GHG levels (U.S. EPA 2021b). Specifically, 34,522 MMT of CO_2e of CO_2, 8,241 MMT of CO_2e of CH_4, 2,997 MMT of CO_2e of N_2O, and 1,001 MMT of CO_2e of fluorinated gases were emitted in 2015. The largest source of GHG emissions were energy production and use (includes fuels used by vehicles and buildings), which accounted for 75 percent of the global GHG emissions. Agriculture uses and industrial processes contributed 12 percent and six percent, respectively. Waste sources contributed three percent, and two percent was due to international transportation sources. These sources account for approximately 98 percent because there was a net sink of two percent from land-use change and forestry.[3]

United States Emissions Inventory

Total U.S. GHG emissions were 6,558 MMT of CO_2e in 2019. Emissions decreased by 1.7 percent from 2018 to 2019; since 1990, total U.S. emissions have increased by an average annual rate of 0.06 percent for a total increase of 1.8 percent between 1990 and 2019. The decrease from 2018 to 2019 reflects the combined influences of several long-term trends, including population changes, economic growth, energy market shifts, technological changes such as improvements in energy efficiency, and decrease in carbon intensity of energy fuel choices. In 2019, the industrial and transportation end-use sectors accounted for 30 percent and 29 percent, respectively, of nationwide GHG emissions while the commercial and residential end-use sectors accounted for 16

[1] The Intergovernmental Panel on Climate Change's (2021) *Sixth Assessment Report* determined that methane has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for methane, consistent with the Intergovernmental Panel on Climate Change's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.
[2] World Meteorological Organization. 2022. Greenhouse Gases. Accessible at: https://wmo.int/topics/greenhouse-gases
[3] U.S. EPA Climate Change Indicators: Global Greenhouse Gas Emissions. Last updated April 2021. Accessible at: https://www.epa.gov/climate-indicators/climate-change-indicators-global-greenhouse-gas-emissions

percent and 15 percent of nationwide GHG emissions, respectively, with electricity emissions distributed among the various sectors.[4]

California Emissions Inventory

Based on the CARB California Greenhouse Gas Inventory for 2000-2022, California produced 371.1 MMT of CO_2e in 2022, which is 9.3 MMT of CO_2e lower than 2021 levels. The major source of GHG emissions in California is the transportation sector, which comprises 39 percent of the State of California's total GHG emissions. The industrial sector is the second largest source, comprising 23 percent of the State's GHG emissions while electric power accounts for approximately 16 percent.[5] The magnitude of California's total GHG emissions is due in part to its large size and large population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, the State of California (State) achieved its 2020 GHG emission reduction target of reducing emissions to 1990 levels as emissions fell below 431 MMT of CO_2e.[6] The annual 2030 statewide target emissions level is 260 MMT of CO_2e.[7]

Local Emissions Inventory

As discussed in the City's General Plan Environmental Impact Report adopted in June 2014, Clovis' 2014 GHG emissions totaled approximately 856,578 metric tons of CO_2e ($MTCO_2e$), of which 590,935 $MTCO_2e$ were from community-wide emissions and 265,643 $MTCO_2e$ were from natural gas permitted sources. Of the 590,935 $MTCO_2e$ of community-wide emissions, transportation contributed 63 percent; residential energy contributed 14 percent, non-residential energy contributed eight percent; off-road equipment contributed eight percent; waste contributed four percent; and water and wastewater contributed four percent.[8]

c. Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest on record. The average global land and ocean surface temperature for January 2025 was 1.33°C (2.39°F) above the 20th century average of 12.0°C (53.6°F) (National Oceanic and Atmospheric Administration 2025). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations jointly indicate that LSAT and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential

[4] U.S. EPA. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019. April 2021. Accessible at: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019
[5] CARB. 2025. Current California GHG Emission Inventory Data. https://ww2.arb.ca.gov/ghg-inventory-data
[6] CARB 2021. GHG 1990 Emissions Level & 2020 Limit. https://ww2.arb.ca.gov/ghg-2020-limit
[7] CARB 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf
[8] City of Clovis. 2014. Clovis, City of. 2014a. General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large wildfires, and more drought years.[9] In addition to statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally specific climate change case studies.[10] However, while there is growing scientific consensus about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary follows of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality and Wildfires

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century. Higher temperatures are conducive to air pollution formation, and rising temperatures could therefore result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains. If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State. However, if higher temperatures are accompanied by possible wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and thereby ameliorate the pollution associated with them.[11]

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the West, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more.[12] This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand are not well understood. The average early spring snowpack in the western U.S., including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the central and southern California coasts.[13] The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that

[9] California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. Accessible at: https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf
[10] Ibid.
[11] California Natural Resources Agency. 2009. 2009 California Climate Adaptation Strategy. March 2009. Accessible at: http://resources.ca.gov/docs/climate/Statewide_Adaptation_Strategy.pdf
[12] California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. Accessible at: https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf
[13] Ibid.

falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050.[14]

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding. Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from flooding and erosion of coastal areas. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per year.[15] Global mean sea levels in 2013 were about 0.23 meters higher than those of 1880.[16] Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust GHG emission control measures. The most recent IPCC report predicts a mean sea level rise ranging between 0.25 to 1.01 meters by 2100 with the sea level ranges dependent on a low, intermediate, or high GHG emissions scenario.[17] A rise in sea levels could erode 31 to 67 percent of southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure.[18] Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has an over $50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts.[19] Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks.[20] Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality.[21]

[14] California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. Accessible at: https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf
[15] World Meteorological Organization. 2022. Greenhouse Gases. Accessible at: https://wmo.int/topics/greenhouse-gases
[16] National Aeronautics and Space Administration. 2020. "Global Climate Change – Vital Signs of the Planet – Sea Level." https://climate.nasa.gov/vital-signs/sea-level/
[17] IPCC. 2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)] Cambridge University Press. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf
[18] California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. Accessible at: https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf
[19] California Department of Food and Agriculture. 2020. California Agricultural Production Statistics." Accessed July 2025: https://www.cdfa.ca.gov/statistics/
[20] California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. Accessible at: https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf
[21] California Climate Change Center (CCCC). 2006. Climate Scenarios for California. https://research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/united-states/west-coast-amp-hawaix27i/california---statewide/CCCC.--2006.--Climate-Scenarios-for-California.pdf

Ecosystems

Climate change and the potential resultant changes in weather patterns could have ecological effects on the global and local scales, including habitat for plants, animals, and people. Soil moisture is likely to decline in many regions as a result of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage.[22]

4.6.2 Regulatory Setting

a. Federal Regulations

Federal GHG Emissions Regulation

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. In 2012, the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in Utility Air Regulatory Group v. EPA (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of best available control technology.

Safer Affordable Fuel-Efficient Vehicle Rule

On September 27, 2019, the U.S. EPA and the National Highway Safety Administration published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program." The Part One Rule revokes California's authority to set its own GHG emissions standards and set zero-emission vehicle mandates in California. To account for the effects of the Part One Rule, CARB released off-model adjustment factors on November 20, 2019, to adjust criteria air pollutant emissions outputs from the emission factor (EMFAC) model. The Final SAFE Rule (i.e., Part Two) then relaxed federal GHG emissions and Corporate Average Fuel Economy standards to increase in stringency at only about 1.5 percent per year from model year 2020 levels over model years 2021-2026.[23] The previously established emission standards and related fuel economy standards would have achieved about four percent per year improvements through model year 2025. Therefore, CARB has prepared off-model CO_2 emissions adjustment factors for both the EMFAC2014 and EMFAC2017 models to

[22] Parmesan. August. 2006. Ecological and Evolutionary Responses to Recent Climate Change. Annual Review of Ecology, Evolution and Systematics, Vol. 37, 2006. doi:10.1146/annurev.ecolsys.37.091305.110100
[23] CARB. 2020. EMFAC Off-Model Adjustment Factors for Carbon Dioxide (CO2) Emissions to Account for the SAFE Vehicles Rule Part One and the Final SAFE Rule. https://ww2.arb.ca.gov/sites/default/files/2023-02/emfac_off_model_co2_adjustment_factors_06262020-final.pdf

account for the impact of the SAFE Vehicles Rule.[24] With the incorporation of these adjustment factors, operational emission factors for CO_2 generated by light-duty automobiles, light-duty trucks, and medium-duty trucks associated with project-related vehicle trips may increase by approximately one percent (in 2020) up to as much as 17 percent (in 2050) compared to non-adjusted estimates. These increases would not alter the significance of the operational GHG emissions from development facilitated by the project as studied in this EA and discussed further below.

b. State Regulations

California's Advanced Clean Cars program (Assembly Bill 1493)

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "Low Emission Vehicle III GHG", regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emission Vehicle, Zero Emissions Vehicles, and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions compared to their model year 2016 levels.[25] The implementation of these rules is currently delayed due to the SAFE Vehicle Rule, described under *Federal Regulations*.

Assembly Bill 32 (Global Warming Solutions Act and Scoping Plan)

California's major initiative for reducing GHG emissions is outlined in AB 32, the "California Global Warming Solutions Act of 2006," which was signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 Statewide GHG level and 2020 limit of 427 million $MTCO_2e$. The Scoping Plan was approved by CARB on December 11, 2008 and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan Update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 Statewide goals. The 2013 Scoping Plan Update highlighted California's progress toward meeting the 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land

[24] Ibid.
[25] CARB. 2011. Advanced Clean Cars Summary. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2019-12/acc%20summary-final_ac.pdf

use. The State of California achieved its 2020 GHG emission reduction targets in 2016, and emissions have subsequently fallen further in 2018 to 425 MMTCO2e.

Senate Bill 32 (Global Warming Solutions Act and Scoping Plan Extension)

Senate Bill (SB) 32 signed into law on September 8, 2016, tightens the requirements of AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, it recommends that local governments adopt policies consistent with statewide per capita goals of 6 $MTCO_2e$ by 2030 and 2 $MTCO_2e$ by 2050. As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level).

AB 1279 (California Climate Crisis Act and Scoping Plan Extension)

The California Climate Crisis Act (AB 1279), signed into law on September 16, 2022, requires the State to achieve and maintain net zero GHG emissions as soon as possible, but not later than 2045. The Climate Crisis Act also requires the State to reduce Statewide anthropogenic GHG emissions to 85 percent below the 1990 levels by 2045. Updates to the Scoping Plan are required to identify and recommend measures to achieve these goals and identify and implement policies and strategies that enable carbon dioxide removal solutions and carbon capture, utilization, and storage technologies in the State.

On November 16, 2022, CARB also adopted the 2022 Scoping Plan, which provides a framework for achieving targets for carbon neutrality and reducing anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The 2022 Scoping Plan relies on significant reductions in fossil fuel combustion by deploying clean technologies and fuels, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

Renewables Portfolio Standard Program (Senate Bill 100)

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Senate Bill 97 and CEQA Guidelines Update

SB 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Natural Resources Agency adopted amendments to the *CEQA Guidelines* for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles by 2020 and 2035. SB 375 directs each of the State's 18 major Metropolitan Planning Organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan. On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Fresno Council of Governments (Fresno COG) was assigned targets of a five percent per capita reduction in GHGs per capita by 2020 and a 10 percent reduction in GHGs from transportation sources by 2035. In the Fresno COG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

PRC Division 30 Part 3 Chapter 13.1 and Health and Safety Code Sections 39730.5-8 (Senate Bill 1383)

Adopted in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

1. Methane – 40 percent below 2013 levels
2. Hydrofluorocarbons – 40 percent below 2013 levels
3. Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Executive Order B-55-18

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Code of Regulations Title 24 (California Building Code)

The California Energy Commission (CEC) first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations (CCR), Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency, and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG reduction goals under Health and Safety Code (HSC) Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy consumption, water storage and delivery, and other resource consumption activities. The purpose

of the CALGreen Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality." The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

On August 11, 2021, the CEC adopted the 2022 Title 24 Standards, which went into effect on January 1, 2023. The 2022 standards continue to improve upon the previous (2019) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.[26] The 2022 Title 24 Standards "build on California's technology innovations, encouraging energy efficient approaches to encourage building decarbonization, emphasizing in particular on heat pumps for space heating and water heating. This set of Energy Codes also extends the benefits of photovoltaic and battery storage systems and other demand flexible technology to work in combinations with heat pumps to enable California buildings to be responsive to climate change. This Energy code also strengthens ventilation standards to improve indoor air quality. This update provides crucial steps in the state's progress toward 100 percent clean carbon neutrality by midcentury".[27] The 2022 Energy Code is anticipated to reduce GHG emissions by 10 MMT of CO_2e over the next 30 years and result in approximately 1.5 billion dollars in consumer savings.[28] Compliance with Title 24 is enforced through the building permit process.

Assembly Bill 341/Assembly Bill 1826 (Mandatory Recycling/Composting)

The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows diversion away from landfills of 75 percent of all solid waste by 2020 and annually thereafter. AB 1826 requires recycling of organic waste (i.e., composting). All businesses and public entities that generate four or more cubic yards of solid waste per week and multi-family residential dwellings that have five or more units are required to recycle and compost.

Senate Bill 1383

In September 2016, Governor Brown signed SB 1383 into law. SB 1383 establishes methane reduction targets as part of a larger strategy to combat climate change and reduce greenhouse gas emissions. The law establishes a mandated target to achieve a 75 percent reduction in statewide disposal of organic waste by 2025 and requires the state to increase edible food recovery by 20 percent for human consumption by 2025. To achieve these targets, CalRecycle developed a series of rules for all cities and counties throughout California to implement. The regulations were finalized by CalRecycle in November 2020 and take effect on January 1, 2022.

[26] CEC. 2022. 2022 Building Energy Efficiency Standards. Accessible at: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency
[27] Ibid.
[28] CEC. 2022. Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions From Homes and Businesses. https://www.energy.ca.gov/news/2024-09/energy-commission-adopts-updated-building-standards-expanding-requirements-heat#:~:text=SACRAMENTO%20%E2%80%93%20The%20California%20Energy%20Commission,climate%20and%20public%20health%20goals.

Senate Bills 350 and 100 (Renewable Portfolio/Clean Energy and Pollution Reduction Act)

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. This act also requires doubling of the energy efficiency in existing buildings by 2030.

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent by 2024, 60 percent by 2030, and 100 percent by 2045.

Assembly Bill 1493 (Reduce GHG Emissions from Vehicle Use)

AB 1493 (Chapter 200, Statutes of 2002), known as the first Pavley Bill, amended HSC Sections 42823 and added 43018.5 requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

Assembly Bill 1007 (State Alternative Fuels Plan)

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan (SAF Plan) in partnership with CARB and in consultation with other federal, State, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative non-petroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-State production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuels use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

CARB In-Use On-Road and Off-Road Diesel Rules

The CARB rule imposes limits on idling, restricts the addition of older vehicles, and requires the retirement or replacement of older engines depending on their fleet size category. This policy indirectly impacts energy consumption. More specifically, CARB is also charged with developing air pollution control regulations based upon the best available control measures and implementing feasible control measures under the State and Federal Clean Air Act. (HSC, §§ 39602.5, 39667, 43013, subds. (a) and (h), 43018, 40600, 40601, 40612(a)(2) and (c)(1)(A).) Pursuant to these statutory authorities, more stringent emission standards were adopted in 2004 for off-road construction equipment (i.e., "Tier 4" standards) (40 Code of Federal Regulations Parts 1039, 1065, and 1068; Cal. Code Regs., tit. 13, § 2025; AR 2854). CARB also adopted emission standards for on-road heavy duty diesel vehicles (i.e. haul trucks). (CCR, tit. 13, § 1956.8.) These haul truck regulations mandate fleet turn-over to ensure that by January 1, 2023 nearly all on-road diesel trucks will have 2010 model year engines or equivalent [i.e. Tier 4]. In addition, interim steps are incorporated into the regulations (e.g., vehicles older than 1999 will be replaced with newer engines by 2020).

California Advance Clean Trucks Program

In June 2020, CARB approved the Advanced Clean Trucks regulation, which requires manufacturers who certify Class 2b-8 chassis or complete vehicles with combustion engines to sell zero-emission trucks as an increasing percentage of their annual California sales from 2024 to 2035. In addition, the regulation requires company and fleet reporting for large employers and fleet owners with 50 or more trucks. By 2045, all new trucks sold in California must be zero-emission. Implementation of this regulation would reduce consumption of nonrenewable transportation fuels as trucks transition to alternative fuel sources.

Executive Order B-48-18 (Zero-Emission Vehicles)

On January 26, 2018, Governor Brown signed Executive Order B-48-18 requiring all State entities to work with the private sector to have at least 5 million zero-emission vehicles (ZEVs) on the road by 2030, as well as install 200 hydrogen fueling stations and 250,000 electric vehicle (EV) charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct current fast chargers. This order also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 Zero-Emissions Vehicle Action Plan, along with the 2018 ZEV Action Plan Priorities Update, which includes and extends the 2016 ZEV Action Plan (Governor's Interagency Working Group on Zero-Emission Vehicles 2016, 2018), to help expand private investment in ZEV infrastructure with a focus on serving low-income and disadvantaged communities.

Executive Order N-79-20 (Zero Emissions Vehicles Sales)

Governor Gavin Newsom signed Executive Order N-79-20 in September 2020, which sets a statewide goal that 100 percent of all new passenger car and truck sales in the State will be zero-emissions by 2035. It also sets a goal that 100 percent of statewide new sales of medium- and heavy-duty vehicles will be zero emissions by 2045, where feasible, and for all new sales of trucks to be zero emissions by 2035. Additionally, the Executive Order targets 100 percent of new off-road vehicle sales in the State to be zero emission by 2035. CARB is responsible for implementing the new vehicle sales regulation.

Senate Bill 1020

SB 1020, signed into law on September 16, 2022, requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035, 95 percent by 2040, and 100 percent by 2045. All State agencies facilities must be served by 100 percent renewable and zero-carbon resources by 2030. SB 1020 also requires the Public Utilities Commission, Energy Commission, and CARB to issue a joint progress report outlining the reliability of the electrical grid with a focus on summer reliability, as well as challenges and gaps. Additionally, SB 1020 requires the Public Utilities Commission to define energy affordability and use energy affordability metrics to develop protections, incentives, discounts, or new programs for residential customers facing hardships due to energy or gas bills.

CARB Gas Appliances Sales Ban

As part of the 2022 State Implementation Plan in September of 2022, CARB adopted a ban by 2030 on new sales of natural gas heaters, water heaters, and furnaces. This new measure is intended to reduce emissions from new residential and commercial space and water heaters sold in the State. An emission standard for space and water heaters will go into effect in 2030. Beginning in 2030, 100 percent of the sales of new natural gas-powered heaters and water heaters would need to comply with the emission standard, such as putting in electric heaters or other zero-emission options.

c. Regional and Local Regulations

San Joaquin Valley Air Pollution Control District

The SJVAPCD policies for addressing GHG emissions in CEQA are documented in their *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA.*[29] In the guidance, SJVAPCD recommends using performance-based standards approach that determines significance based on project design elements that would reduce GHG emissions. This approach would pre-quantify the emissions reduced and would negate the need to quantify project emissions. Implementation of SJVAPCD-approved Best Performance Standards (BPS) would demonstrate that a new project would have a less than cumulatively significant impact. For land use development projects, examples of BPS include zero net energy buildings, energy efficient appliances, and reducing vehicle miles travelled.[30] However, SJVAPCD guidance does not address SB 32 goals or CARB's latest 2017 Scoping Plan.

Fresno Council of Governments 2022 Regional Transportation Plan

Fresno Council of Governments' (Fresno COG) 2022 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted on July 28, 2022, and outlines a regional transportation network that is environmentally sensitive and reduces GHG emissions through 2046.[31] The RTP/SCS includes policies, actions, and a SCS to encourage increased transportation and facility design, along with infill development near existing public transportation, which is intended to reduce VMT and the associated GHG emissions from those mobile sources. The following goals and policies from the 2022 RTP/SCS are relevant to the project.

City of Clovis General Plan

The City of Clovis General Plan Air Quality Element includes the following applicable goals and policies related to GHG:

[29] SJVAPCD. 2009. Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA. https://ww2.valleyair.org/permitting/climate-change-action-plan/
[30] SJVAPCD. 2009. Final Staff Report Addressing Greenhouse Gas Emissions Impacts Under the California Environmental Quality Act. December. https://www.valleyair.org/Programs/CCAP/12-17-09/1%20CCAP%20-%20FINAL%20CEQA%20GHG%20Staff%20Report%20-%20Dec%2017%202009.pdf
[31] Fresno Council of Governments' (Fresno COG). 2022. 2022 Regional Transportation Plan/Sustainable Communities Strategy. Adopted July 28, 2022. Accessible at: https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/

Goal 2: Vibrant communities that are accessible by sustainable transportation options

Policy 4: Encourage alternatives to single-occupancy vehicles that reduce vehicle miles traveled (VMT) and greenhouse gas emissions.

Policy 6: Encourage sustainable development that focuses growth near activity centers and mobility options that achieve greater location efficiency.

Policy 10: Incentivize and support efforts to improve air quality and minimize pollutants from transportation.

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

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

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

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

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

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

The City of Clovis General Plan Circulation Element includes the following applicable goal and policies related to GHG:

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

Policy 1.1. Multimodal network. The city shall plan, design, operate, and maintain the transportation network to promote safe and convenient travel for all users: pedestrians, bicyclists, transit riders, freight, and motorists.

Policy 1.4. Jobs and housing. Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles travelled and effectively utilize the existing transportation infrastructure.

City of Clovis Active Transportation Plan

The City's Active Transportation Plan was adopted in September 2023 and defines a clear vision for the city's active transportation network and supports walking, bicycling, transit, and use of other emerging modes of personal transport as alternatives to driving. The Active Transportation Plan includes five main goals related to safety and comfort, equity, connectivity, recreation, and mode shift.[32]

[32] (City of Clovis 2023).

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The proposed project is analyzed for consistency with the 2022 Scoping Plan goals and its Appendix D residential project attributes.

Construction and operational GHG emissions are estimated for informational purposes only using the California Emissions Estimator Model (CalEEMod), version 2022.1 CalEEMod uses project-specific information, including the project's land uses, square footages for different uses, and location, to estimate a project's construction and operational emissions. Although the proposed project would facilitate the development of 1,303 residential units, as a conservative estimate, project emissions represent the maximum potential increase in the number of residential units by 1,651 units as described in Table 2-2 in Chapter 2, *Project Description*.

Significance Thresholds

To determine whether a project would result in a significant impact related to GHG emissions, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence on climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact is 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, other current projects, and probable future projects (CEQA Guidelines Section 15064[h][1]).

Section 15064.4 of the *CEQA Guidelines* recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions. Neither the City of Clovis nor the SJVAPCD has adopted a numeric threshold to address project-level GHG emissions. The BPS approach does not include measures to address the 2045 target established by AB 1279.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (*CEQA Guidelines* Section 15064.7[c]).

According to *CEQA Guidelines* Section 15183.5, projects can tier from a qualified GHG reduction plan, which allows for project-level evaluation of GHG emissions through the comparison of the project's consistency with the GHG reduction policies included in a qualified GHG reduction plan. This approach is considered by the Association of Environmental Professionals (AEP) in their white paper, *Beyond Newhall and 2020*, to be the most defensible approach presently available under CEQA to determine the significance of a project's GHG emissions (AEP 2016). However, the City of Clovis and the SJVAPCD do not have a qualified GHG reduction plan.

In the absence of any adopted numeric threshold, the significance of the project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. For the proposed project, the most directly applicable adopted regulatory plan to reduce GHG emissions is CARB's 2022 Scoping Plan. As discussed in Appendix D of the 2022 Scoping Plan[33], residential projects that include all of the following attributes can be determined to be consistent with the State's climate goals:

- At least 20 percent of the units are affordable to lower-income residents;
- Result in no net loss of existing affordable units;
- Utilize existing infill sites that are surrounded by urban uses, and reuse or redevelop previously developed, underutilized land presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer);
- Include transit-supportive densities (minimum of 20 residential dwelling units/acre), or are in proximity to existing transit (within ½ mile), or satisfy more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS), for "SCS consistency" that would go further to reduce emissions;
- Do not result in the loss or conversion of the State's natural and working lands;
- Use all electric appliances, without any natural gas connections, and would not use propane or other fossil fuels for space heating, water heating, or indoor cooking;
- Provide EV charging infrastructure at least in accordance with CalGreen Tier 2 standards;
- Relax parking requirements by:
    - Eliminating parking requirements or including maximum allowable parking ratios.
    - Providing residential parking supply at a ratio of <1 parking space per unit;
    - Unbundling residential parking costs from costs to rent or lease.

[33] CARB. 2022. Appendix D, Local Actions, of the 2022 Scoping Plan for Achieving Carbon Neutrality. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact GHG-1 THE PROPOSED PROJECT COULD POTENTIALLY GENERATE GHG EMISSIONS THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT. EVEN WITH IMPLEMENTATION OF MITIGATION MEASURE (MM) GHG-1, THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As discussed above under Section 4.6.3a, *Methodology and Significance Thresholds*, the proposed project would have less than significant GHG impacts if it were to be consistent with the 2022 Scoping Plan goals and residential project attributes from Appendix D of the 2022 Scoping Plan. A major element of the 2022 Scoping Plan is the aggressive reduction of fossil fuels, which includes the development of renewable energy and phasing out the use of natural gas for heating structures. Future development facilitated by the proposed project would adhere to the most recent iteration of California's Energy Efficiency Standards and CALGreen adopted through Section 8.17.101 of the Clovis Municipal Code (CMC), which would improve energy efficiency and reduce emissions associated with water use and energy. Pursuant to CALGreen, new multi-family residential development would be required to include low-flow plumbing and energy efficient appliances; and include 10 percent of EV-capable parking spaces, 25 percent of EV-ready parking spaces, and five percent of Level 2 EV Supply Equipment parking spaces[34]. Future development would also be required to divert at least 65 percent of construction wastes pursuant to Section 6.3.1.03 of the CMC and CALGreen; recycle and compost organic wastes pursuant to SB 1383; and comply with the City's Water Efficient Landscape Requirements outlined in Chapter 6.5, Article 5 of the CMC. Therefore, the proposed project would be consistent with the goals of the 2022 Scoping Plan.

Table 4.6-1 shows the proposed project's consistency with the residential project attributes outlined in Appendix D of the 2022 Scoping Plan.

Table 4.6-1 Project Consistency with Appendix D of the 2022 Scoping Plan

Residential Project Attributes	Project Consistency
At least 20 percent of the units are affordable to lower-income residents.	**Inconsistent.** As discussed in Chapter 2, *Project Description*, the proposed project would facilitate the development of 1,303 residential units on 20 Infill Rezone Program sites. The units are targeting affordable housing; however, the proposed project does not include specific development at this time, therefore it is unknown what percentage of each development will be affordable to low-income residents.
Result in no net loss of existing affordable units.	**Consistent.** As shown on Table 2-1 in Chapter 2, *Project Description*, the 20 Infill Rezone Program sites are currently vacant or developed with single-family residences or office uses, and do not include affordable units. The proposed project would not result in a net loss of existing affordable units.

[34] Five percent of Level 2 EVSE parking spaces only apply to development with 20 or more units.

Residential Project Attributes	Project Consistency
Utilize existing infill sites that are surrounded by urban uses, and reuse or redevelop previously developed, underutilized land presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).	**Consistent.** The proposed project would facilitate development on infill sites surrounded by urban uses and served by existing utilities and public services.
Include transit-supportive densities (minimum of 20 residential dwelling units/acre), or are in proximity to existing transit (within ½ mile), or satisfy more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS), for "SCS consistency" that would go further to reduce emissions.	**Consistent.** As discussed in Chapter 2, Section 2.3, *Infill Rezone Program Sites*, all 20 Infill Rezone Program sites would include transit-supportive densities of more than 20 residential dwelling units per acre.
Do not result in the loss or conversion of the State's natural and working lands.	**Consistent.** The proposed project would facilitate development on infill sites surrounded by urban uses and would not result in the loss or conversion of the State's natural and working lands.
Use all electric appliances, without any natural gas connections, and would not use propane or other fossil fuels for space heating, water heating, or indoor cooking.	**Inconsistent.** The City currently does not mandate the use of all electric appliances or prohibit the use of natural gas and propane.
Provide EV charging infrastructure at least in accordance with CalGreen Tier 2 standards.	**Inconsistent.** Future development facilitated by the proposed project would be required to comply with CALGreen mandatory EV requirements, including installation of 10 percent of EV-capable parking spaces, 25 percent of EV-ready parking spaces, and five percent of Level 2 EV Supply Equipment parking spaces. While CALGreen Tier 2 standards impose stricter EV requirements, they remain voluntary and are not mandated.
Relax parking requirements by: ▪ Eliminating parking requirements or including maximum allowable parking ratios; ▪ Providing residential parking supply at a ratio of <1 parking space per unit; ▪ Unbundling residential parking costs from costs to rent or lease.	**Inconsistent.** The proposed project does not include specific development proposals and the number or configuration of parking spaces for individual projects is currently unknown.

Source: CARB 2022b

As shown in Table 4.6-1, the proposed project would be inconsistent with the residential project attributes related to percentage of affordable units, natural gas, EVs, and parking requirements. Therefore, this impact would be potentially significant.

GHG Emissions

Total GHG emissions for future development under the proposed project are provided below for informational purposes. Operation of future development under the proposed project would generate GHG emissions associated with area sources, energy and water usage, vehicle trips, wastewater and solid waste generation, and refrigerants. Table 4.6-2 shows the estimated operational GHG emissions associated with maximum buildout potential of 1,651 units for future development under the proposed project. As shown therein, annual emissions from the proposed project would be approximately 13,391 MT of CO_2e per year.

Table 4.6-2 Operational GHG Emissions

Emission Source	Annual Emissions (MT of CO_2e)
Mobile	10,003
Area	21
Energy	2,969
Water	63
Waste	333
Refrigerants	2
Operational Total	**13,391**

Source: Appendix A Air Quality (AQ) 1

Implementation of MM GHG-1 would ensure future development facilitated by the proposed project be compliant with CALGreen Tier 2 EV charging requirements and parking requirements, and would encourage future development to include an all-electric design. However, pursuant to case law *California Restaurant Association v. City of Berkeley*, the 9th Circuit Appellate Court found that a city cannot ban natural gas because they are preempted from doing so by federal law under the Energy Policy and Conservation Act. Therefore, the proposed project would remain inconsistent with the residential project attribute related to natural gas from Appendix D of the 2022 Scoping Plan. This impact would remain significant and unavoidable even with adoption of MM GHG-1.

Mitigation Measure

GHG-1 Greenhouse Gas Emissions Reductions

Development on the 20 Infill Rezone Program sites shall be encouraged to not include natural gas appliances or natural gas plumbing; shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Significance after Mitigation

Significant and unavoidable.

Threshold 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-2 THE PROPOSED PROJECT CONFLICTS WITH THE CARB 2022 SCOPING PLAN. THERE ARE NO LOCAL PLANS, POLICIES, OR REGULATIONS ADOPTED FOR THE PURPOSE OF REDUCING GHG EMISSIONS THAT WOULD APPLY TO THE PROJECT. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH IMPLEMENTATION OF MM GHG-1.

CARB 2022 Scoping Plan

As discussed above under Impact GHG-1, even with implementation of MM GHG-1, the proposed project would remain inconsistent with the 2022 Scoping Plan as the City does not require CALGreen Tier 2 standards, EV parking spaces, or reduced parking standards, and does not restrict natural gas appliances and heating in new developments. Additionally, the City cannot guarantee what percentage of each future development will be affordable to low-income residents on any of the 20 Infill Rezone Program sites so is considered inconsistent with the 20 percent affordability

requirement of the CARB 2022 Scoping Plan. Therefore, the proposed project would conflict with the 2022 Scoping Plan and impacts would be potentially significant.

Fresno COG 2022 Regional Transportation Plan/Sustainable Communities Strategy

The 2022 RTP/SCS includes goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies.[35] Table 4.6-3 shows the proposed project's consistency with applicable policies in the 2022 RTP/SCS. As shown in Table 4.6-3, the proposed project would be consistent with the 2022 RTP/SCS. Therefore, impacts related to consistency with GHG emissions-related goals and policies of the 2022 RTP/SCS would be less than significant.

Table 4.6-3 Project Consistency with 2022 RTP/SCS

Goals and Policies	Project Consistency
Goal 2: Vibrant communities that are accessible by sustainable transportation options.	
Policy 4: Encourage alternatives to single-occupancy vehicles that reduce vehicle miles traveled (VMT) and greenhouse gas emissions.	**Consistent.** All of the 20 Infill Rezone Program sites are located within 1.25 miles of a bus stop. The proximity to bus stops would encourage the use of alternative transportation and reduce the use of single-occupancy vehicles and thereby VMT. In addition, future development would be required to provide bicycle parking spaces pursuant to CALGreen requirements, which would encourage the use of bicycles and further reduce VMT.
Policy 6: Encourage sustainable development that focuses growth near activity centers and mobility options that achieve greater location efficiency.	**Consistent.** Future development facilitated by the proposed project would adhere to the most recent iteration of California's Energy Efficiency Standards and CALGreen. All 20 Infill Rezone Program sites would be located on infill sites in urbanized areas of the city in proximity to jobs and services, which would improve mobility and reduce VMT.
Policy 10: Incentivize and support efforts to improve air quality and minimize pollutants from transportation.	**Consistent.** As discussed under Impact GHG-1, with implementation of MM GHG-1, future development facilitated by the proposed project would be required to comply with CALGreen Tier 2 EV requirements and be encouraged to include an all-electric design, which would reduce pollutants and improve air quality. In addition, future development facilitated by the proposed project would adhere to the most recent iteration of California's Energy Efficiency Standards and CALGreen, and include energy-efficient appliances, low-flow plumbing, and water efficient landscaping.

Source: Fresno COG 2022

City of Clovis General Plan

The Air Quality Element and Circulation Element of the Clovis General Plan contain emissions goals that would have the effect of reducing GHG emissions. As shown in Table 4.6-4, the proposed project would be consistent with these goals and policies. Therefore, impacts related to consistency with GHG emissions-related goals of the General Plan would be less than significant.

[35] Fresno Council of Governments' (Fresno COG). 2022. 2022 Regional Transportation Plan/Sustainable Communities Strategy. Adopted July 28, 2022. Accessible at: https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/

Table 4.6-4 Project Consistency with City of Clovis General Plan

Goals and Policies	Consistency
Goal 1: A local environment that is protected from air pollution and emissions.	
Policy 1.1. Land use and transportation. Reduce greenhouse gas and other local pollutant emissions through mixed use and transit-oriented development and well-designed transit, pedestrian, and bicycle systems.	**Consistent.** All 20 Infill Rezone Program sites would be located on infill sites in urbanized areas of the city in proximity to jobs and services. In addition, all of the 20 sites are located within 1.25 miles of a bus stop. The proximity to bus stops would encourage the use of alternative transportation and reduce the use of single-occupancy vehicles and thereby VMT.
Policy 1.6. Alternative fuel infrastructure. Encourage public and private activity and employment centers to incorporate electric charging and alternative fuel stations.	**Consistent.** As discussed under Impact GHG-1, with implementation of MM GHG-1, future development facilitated by the proposed project would be required to comply with CALGreen Tier 2 EV requirements.
Policy 1.8. Trees. Maintain or plant trees where appropriate to provide shade, absorb carbon, improve oxygenation, slow stormwater runoff, and reduce the heat island effect.	**Consistent.** Future development would be required to comply with Chapter 9.30 of the CMC which outlines standards to protect and manage trees. Pursuant to Section 9.30.090, projects would be required to replace trees removed or pay an in-lieu fee.
Goal 2: A region with healthy air quality and lower greenhouse gas emissions	
Policy 2.1: Regional coordination. Support regional efforts to reduce air pollution (criteria air pollutants and greenhouse gas emissions) and collaborate with other agencies to improve air quality at the emission source and reduce vehicle miles traveled.	**Consistent.** As discussed in Section 4.2, *Air Quality*, future development would be required to comply with SJVAPCD rules as well as GP EIR MM 3-1 and GP EIR MM 3-5 to reduce criteria air pollutants from construction equipment and architectural coating. In addition, all 20 Infill Rezone Program sites would be located on infill sites in urbanized areas of the city in proximity to jobs and services, which would reduce VMT and GHG. Implementation of MM GHG-1 would also require compliance with CALGreen Tier 2 EV standards, which are more stringent than CALGreen mandatory EV standards, and would improve air quality at the emission source.

Source: City of Clovis 2014

Even with implementation of MM GHG-1, the proposed project would remain inconsistent with the 2022 Scoping Plan, for the same reasons as outlined under Impact GHG-1. This impact would remain significant and unavoidable even with adoption of MM GHG-1.

Mitigation Measures

Implement MM GHG-1.

Significance after Mitigation

Significant and unavoidable.

4.6.4 Cumulative Impacts

The impact of GHG emissions generated by development facilitated by the proposed project is inherently cumulative. GHG emissions from one project cannot, on their own, result in changes in climatic conditions; therefore, the emissions from any project must be considered in the context of their contribution to cumulative global emissions, which is the basis for determining a significant cumulative impact. This is determined through the project's consistency with applicable GHG emission thresholds and applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. The proposed project would be generally consistent with the State's 2022 Scoping Plan, Fresno COG 2022 RTP/SCS, and the City's General Plan. However, as discussed under Impacts GHG-1 and GHG-2, despite implementation of MM GHG-1, the proposed project would still be inconsistent with residential project attributes outlined in Appendix D of the 2022 Scoping Plan including the 20 percent affordability to lower-income residents, all-electric development requirement, CALGreen Tier 2 requirements for EV changing stations, and relaxed parking standards. Therefore, the proposed project would result in a significant and unavoidable cumulative impact on GHG emissions.

Mitigation Measures

Implement mitigation measure GHG-1.

Significance after Mitigation

Significant and unavoidable.

4.7 Hazards and Hazardous Materials

This section evaluates the potential impacts relating to hazards and hazardous materials impacts associated with implementation of the proposed Infill Rezone Program. Potential hazards associated with wildland fires are discussed in Section 4.16, *Effects Found Not to be Significant*.

4.7.1 Setting

a. Hazardous Materials

The term "hazardous material" has different definitions for different regulatory programs. For the purpose of this Environmental Assessment (EA), the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as any material that "because of its quantity, concentrations, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include but are not limited to hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or even death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include asbestos, lead, arsenic, benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The National Priorities List (NPL) is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or

contaminants throughout the United States and its territories. The NPL is intended primarily to guide the United States Environmental Protection Agency (U.S. EPA) in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking underground storage tanks (LUSTs) were upgraded under a federal requirement in the late 1980s. Another category of sites that may have some overlap with the types already mentioned is "brownfields" – previously used, often abandoned, sites that due to actual or suspected contamination are undeveloped or underused. Both the U.S. EPA and California Department of Toxic Substances Control (DTSC) maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners' reluctance to publicly label their property as potentially contaminated.

Asbestos Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by U.S. EPA between the early 1970s and 1991 under the authority of the Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis.[1] Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 structures are affected by asbestos regulations and can cause potential exposure if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ, hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women.[2] Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 structures are affected by LBP regulations and can cause potential exposure if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

Polychlorinated Biphenyls

Polychlorinated biphenyls (PCB) belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored

[1] United States Environmental Protection Agency (U.S. EPA). 2024a. Learn About Asbestos. https://www.epa.gov/asbestos/learn-about-asbestos#:~:text=into%20the%20air.- ,Health%20Effects%20From%20Exposure%20to%20Asbestos,of%20developing%20harmful%20health%20effects. (accessed May 2025).
[2] U.S. EPA. 2024b. Learn About Lead. https://www.epa.gov/lead/learn-aboutlead#:~:text=Adults%20exposed%20to%20lead%20can,in%20both%20men%20and%20women). (accessed May 2024).

liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications.

b. Existing Conditions in Clovis

Hazardous Materials Sites

The locations where hazardous materials are or were used, stored, treated and/or disposed of come to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in database lists maintained by various State, federal, and local regulatory agencies. In addition, federal, State, and local agencies enforce regulations applicable to hazardous waste generators and users.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site and the response to the release would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater due to accidental spills, incidental leakage, or spillage that may have gone undetected. Some facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

The potential to encounter hazardous materials in soil and groundwater in Clovis is generally based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The DTSC EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a future release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as leaking underground storage tank (LUST) sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), Clovis has the following types that are still active or need further investigation: voluntary cleanup, school cleanup, tiered permit, Clean Up Program Site, and Lust Cleanup Site.[3,4] These sites are dispersed throughout Clovis and are listed in the EnviroStor and Geotracker databases, and visualized below in Figure 4.7-1 through Figure 4.7-6.

Existing sites that may potentially contain hazardous land uses in Clovis include large and small-quantity generators of hazardous waste, such as dry cleaners, gas stations and other industrial uses. According to DTSC and SWRCB, there are 62 open sites containing or potentially containing hazardous materials located within Clovis. There are 42 LUST Cleanup Sites, including 41 closed sites and one open LUST Cleanup Site, 10 cleanup program sites, eight closed school sites, two closed

[3] Department of Toxic Substances Control (DTSC). 2025. EnviroStor Database. https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Clovis&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True

[4] State Water Resources Control Board (SWRCB). 2025. GeoTracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=clovis

voluntary agreement cleanup sites, and zero sites in need of evaluation.[5] Figure 4.7-1 through Figure 4.7-6, below, show the hazardous material sites within Clovis in relation to the Infill Rezone Sites and nearby schools.

Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California, but when not handled properly can be considered hazardous. Private residences and building contractors also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Schools

School locations require consideration because children are particularly sensitive to hazardous materials exposure. Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards, as further discussed in Impact HAZ-1, below. As shown in Table 4.12-3 and Figure 4.12-2 of Section 4.12, *Public Services and Recreation*, there are 36 schools located in Clovis. As shown in Figure 4.7-1 through Figure 4.7-6 below, five sites identified as Infill Rezone Program sites under the proposed project are within a 0.25 mile radius of existing schools: Sites 3, 72, 110, 167, and 169. It is not anticipated that multi-family housing to be developed on the sites would use or disturb potentially hazardous products that could impact nearby schools.

[5] Department of Toxic Substances Control (DTSC). EnviroStor Database. Accessed October 2025: https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Clovis&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True

Figure 4.7-1 Hazardous Material Sites, Schools, and Rezone Sites

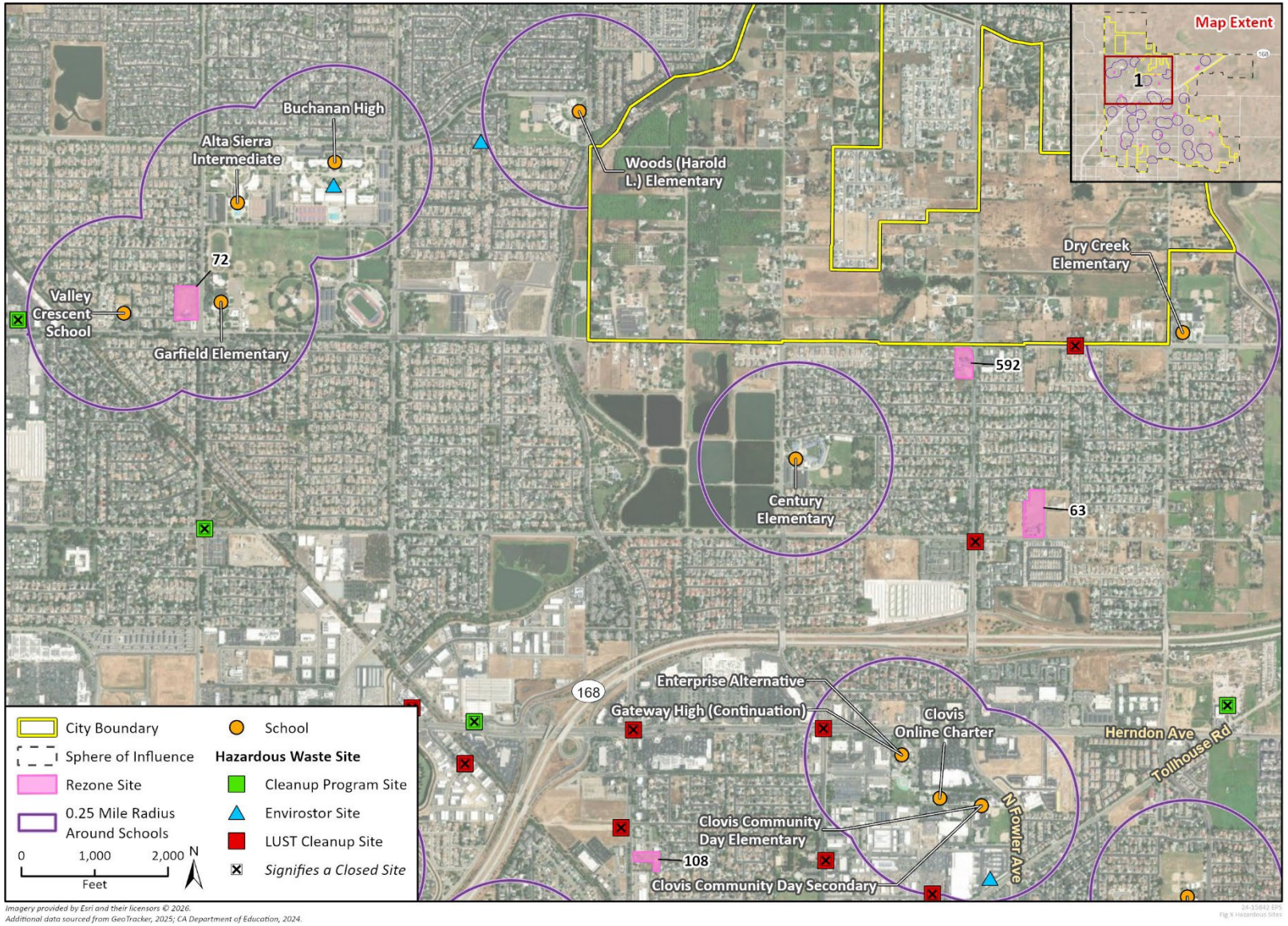


Figure 4.7-2 Hazardous Material Sites, Schools, and Rezone Sites

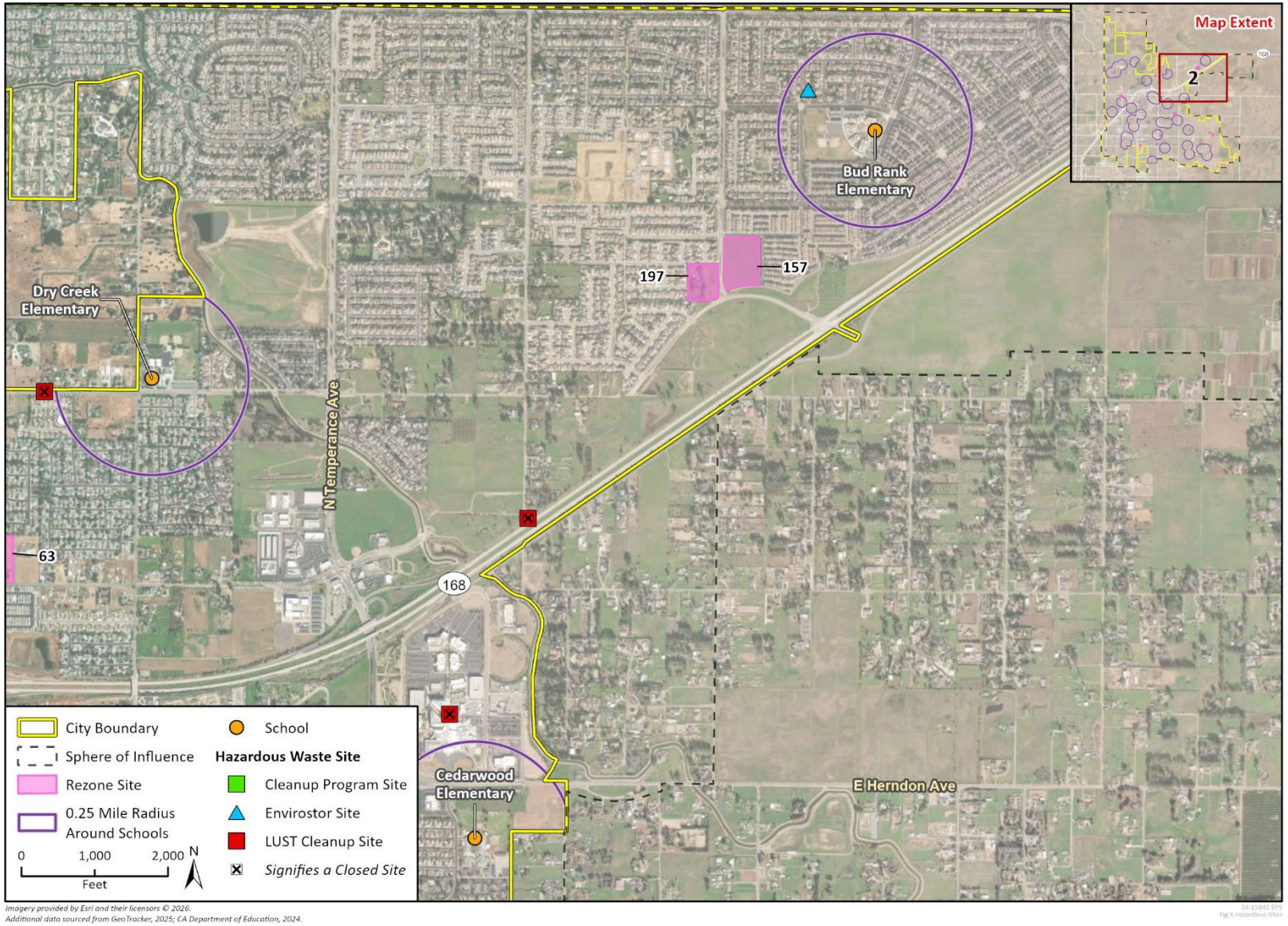


Figure 4.7-3 Hazardous Material Sites, Schools, and Rezone Sites

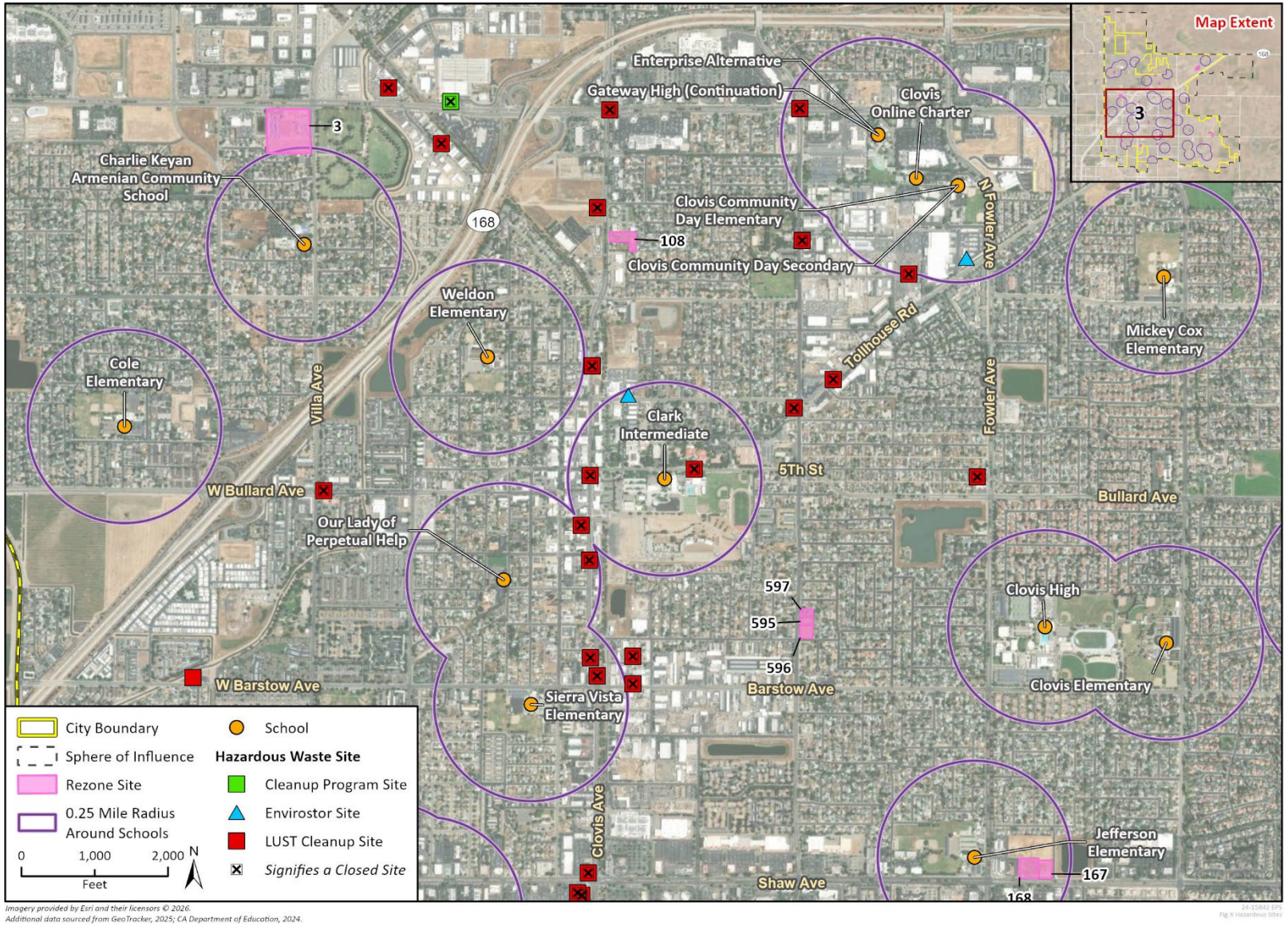


Figure 4.7-4 Hazardous Material Sites, Schools, and Rezone Sites

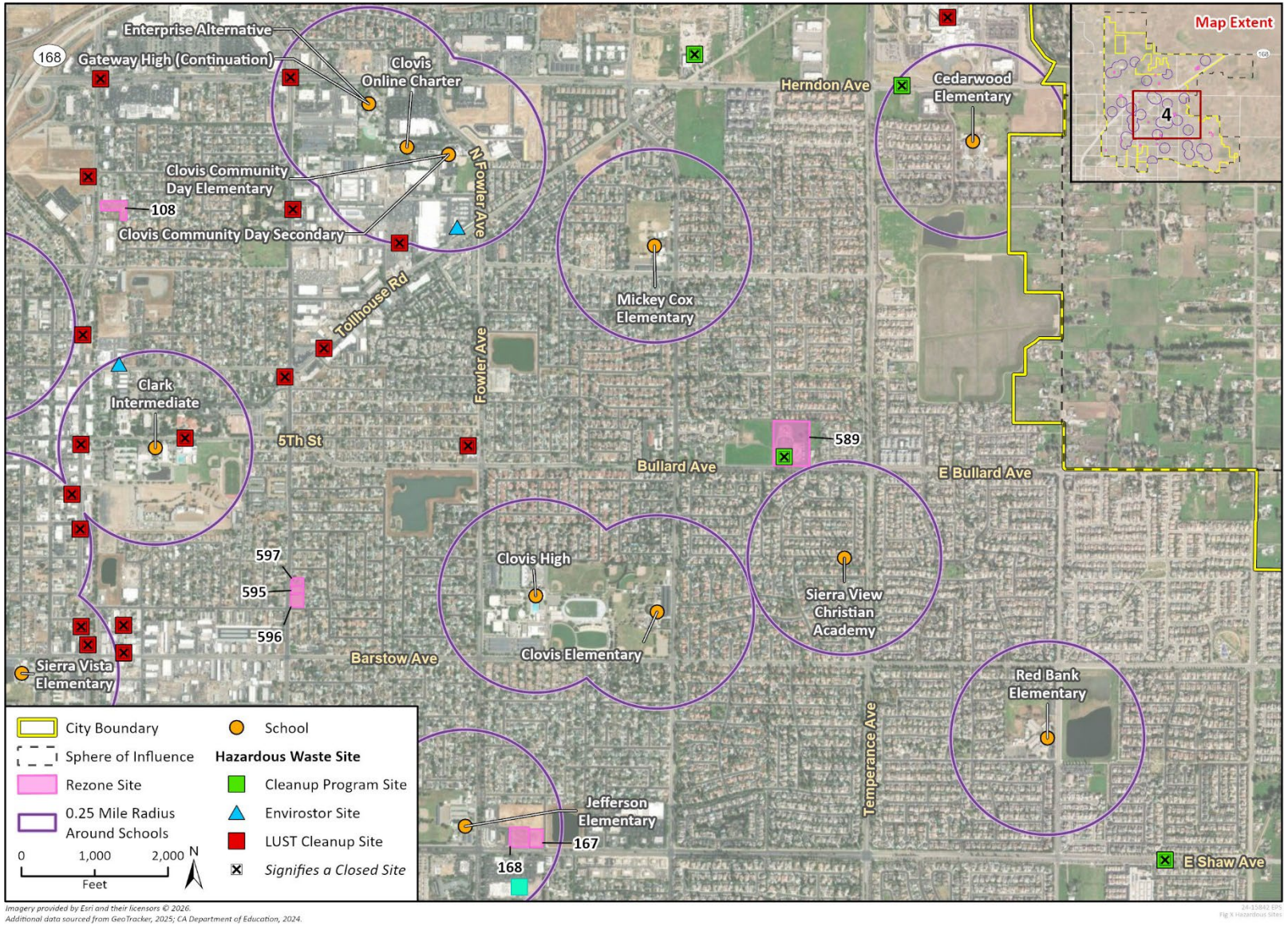


Figure 4.7-5 Hazardous Material Sites, Schools, and Rezone Sites

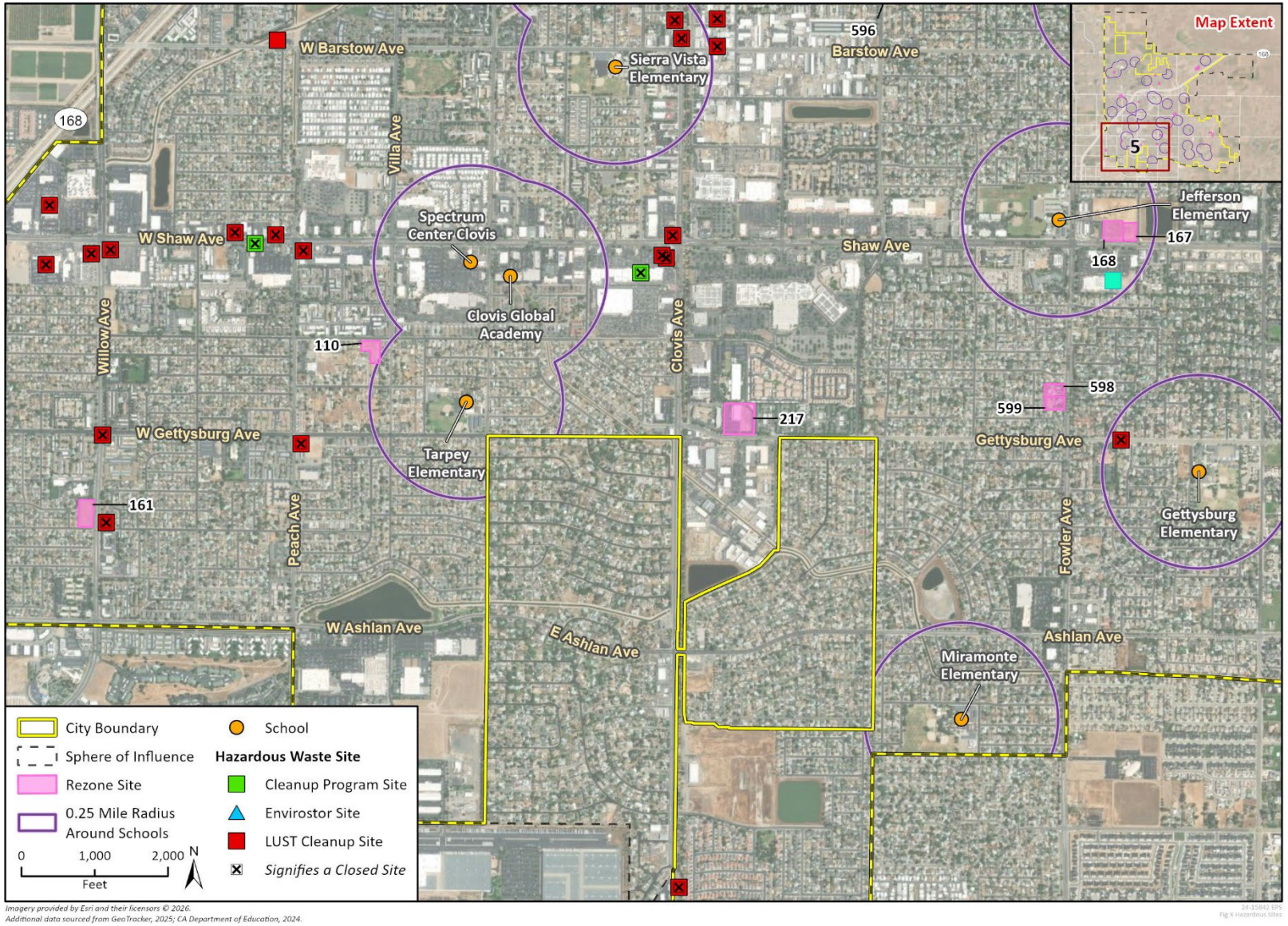
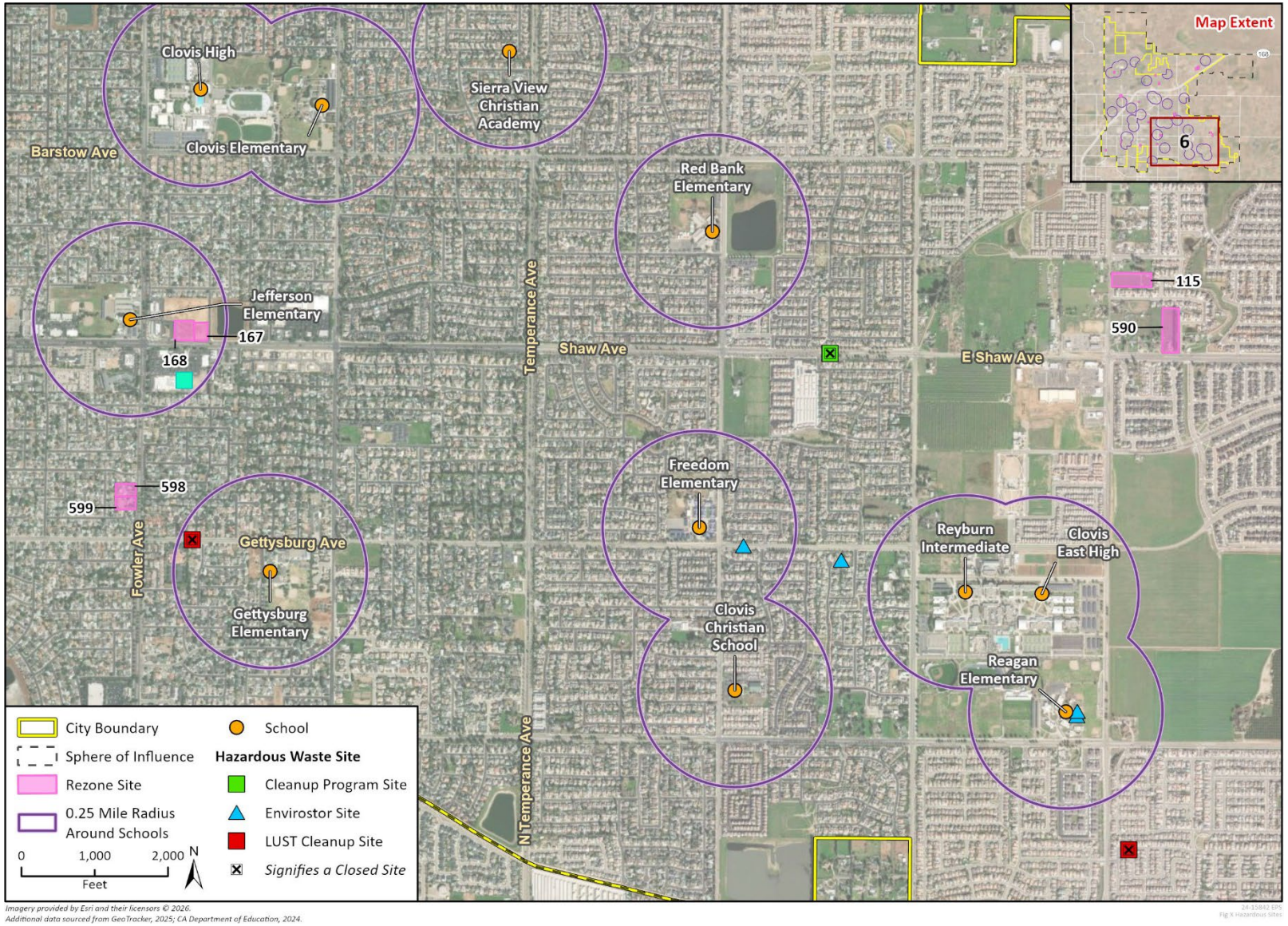


Figure 4.7-6 Hazardous Material Sites, Schools, and Rezone Sites



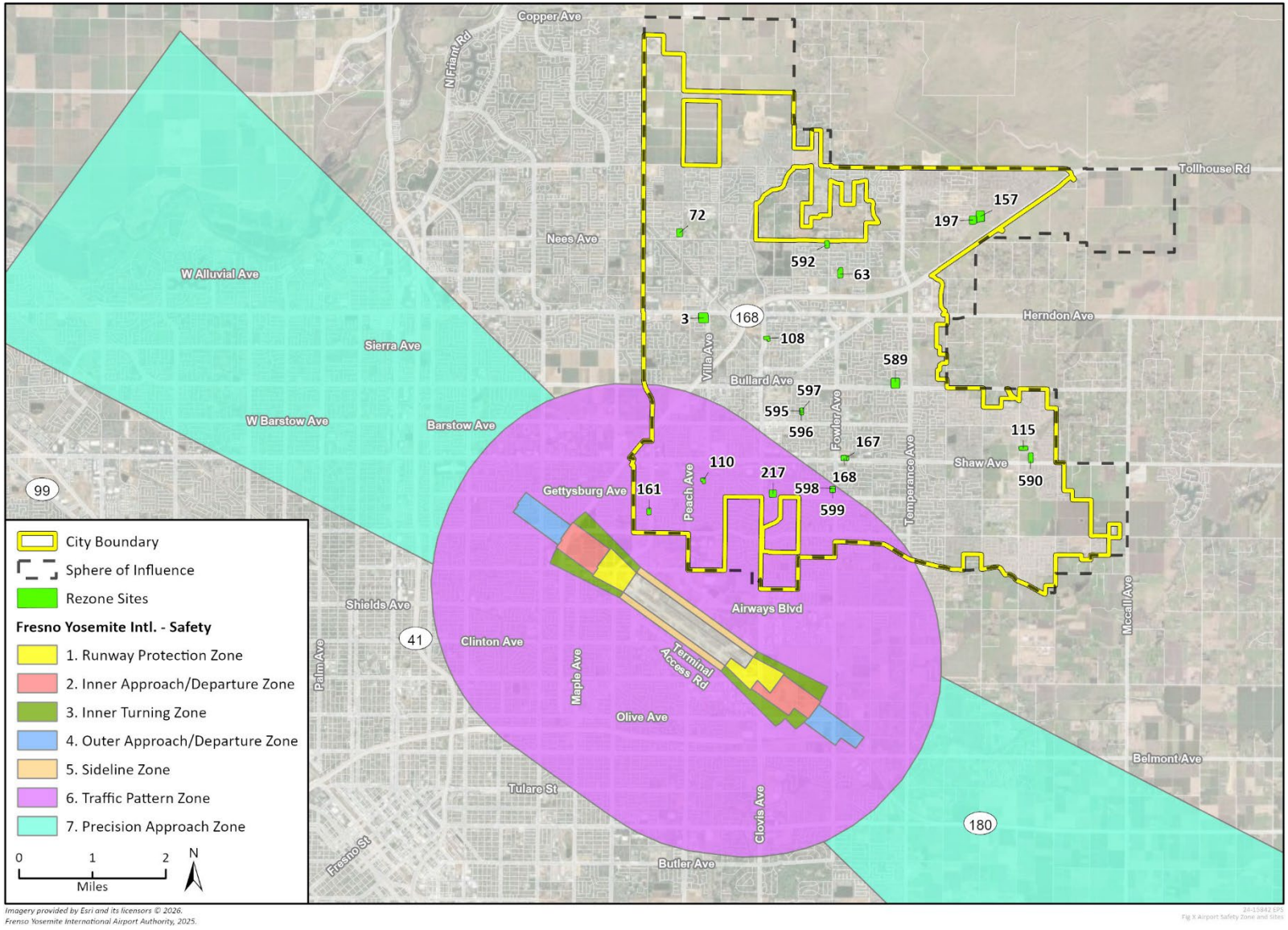
Airports

The Fresno-Yosemite International Airport (FYI) is located approximately 3.5 miles south of the center of the City of Clovis. FYI provides commercial and general aviation access to the national air transportation system in support of business and leisure travel. Aircraft flight operations are regulated by the Federal Aviation Administration (FAA). Five of the Infill Rezone Sites are located within the FYI Safety Compatibility Zones delineated within the Fresno County Airport Land Use Compatibility Plan (ALUCP), as shown in Figure 4.7-7.

The primary hazard associated with land uses near an airport is the risk of aircraft incidents on approach and takeoff. According to the Fresno County Council of Governments ALUCP, Safety Compatibility Zone 6, Traffic Pattern Zone, for FYI extends over part of the City encompassing these five sites. However, there are no restrictions on land uses, residential or other. There are also no restrictions on special characteristics such as distracting lights or glare, sources of smoke or electrical interference, or attractors of birds.[6]

[6] Fresno Council of Governments. 2023. Fresno County Airport Land Use Compatibility Plan Appendix D. https://www.fresnocog.org/wp-content/uploads/2025/01/Appendix-D-Fresno-Yosemite-Intern9ational-Airport-FAT.pdf

Figure 4.7-7 Airport Safety Compatibility Zones



4.7.2 Regulatory Setting

Hazardous materials and waste can pose a potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent unwanted consequences. These regulatory programs are designed to reduce the risk that hazardous substances may pose to people and businesses under normal daily circumstances, and as a result, emergencies and disasters.

a. Federal Regulations

Primary federal agencies with responsibility for hazardous materials management include the U.S. EPA, U.S. Department of Labor's Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation (USDOT). The major laws enforced by these agencies are described below.

Toxic Substances Control Act (TSCA) (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act.

Comprehensive Environmental Response, Compensation and Liability Act, Amended (CERCLA) by the Superfund Amendments and Reauthorization Act (1986)

This law was first enacted in 1980 and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. Comprehensive Environmental Response, Compensation and Liability Act also enabled revision of the National Contingency Plan, which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The National Contingency Plan also established the National Priorities List.

Federal Insecticide, Fungicide and Rodenticide Act

This Act (7 U.S. Code [USC] 136 et seq.) provides federal control of pesticide distribution, sale, and use. The U.S. EPA was given authority under the Act to study the consequences of pesticide usage, and to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by the U.S. EPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Governed by the U.S. Department of Housing and Urban Development (HUD), regulations for LBP are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must follow California and federal occupational safety and health administrations (California Occupational Safety and Health Administration [Cal/OSHA] and federal OSHA, respectively), and the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel can perform abatement activities. All lead and LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

U.S. Environmental Protection Agency

The U.S. EPA is the agency primarily responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. Applicable federal regulations pertaining to hazardous materials are contained in the CFR Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

1. Resource Conservation and Recovery Act of 1976 (42 USC 6901 et seq.)
2. Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (also called the Superfund Act) (42 USC 9601 et seq.)
3. Federal Insecticide, Fungicide, and Rodenticide Act (7 USC 136 et. Seq.)
4. Superfund Amendments and Reauthorization Act of 1986 (Public Law 99 499)

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. U.S. EPA provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

U.S. Department of Transportation Regulations

USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers that transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S. Code (USC) Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 USC Section 5101 et seq. The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100-180. Title 49 of the CFR, which contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to:

(1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any 'person' in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any 'person' of hazardous materials in commerce."

Occupational Safety and Health Act of 1970

The U.S. Department of Labor's OSHA was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by OSHA, contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, there are other applicable federal laws that also address hazardous materials:

- Community Environmental Response Facilitation Act of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

b. State Regulations

Department of Toxic Substances Control (DTSC)

As a department of the California Environmental Protection Agency, the DTSC is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code. The DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the U.S. EPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit

requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the State Water Resources Control Board, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

The Statewide Compliance Division (SCD) of the California DTSC oversees the technical implementation of the state's Unified Program, which integrates six environmental regulatory programs at the local level. Established through amendments to the California Health and Safety Code via Senate Bill 1082 (1994), the Unified Program includes:

- Hazardous Materials Business Plan and Emergency Response Plan
- Hazardous Waste and Tiered Permitting
- Underground Storage Tank Program
- Aboveground Storage Tank Spill Prevention and Control
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Management Plan under the Uniform Fire Code

The SCD conducts triennial reviews of local Unified Program agencies to ensure statewide consistency and compliance with regulatory standards. It also manages inspections, enforcement, and complaint response for hazardous waste generators, facilities, and transporters, and oversees local implementation of hazardous waste surveillance and enforcement activities.

California Environmental Protection Agency (CalEPA)

CalEPA was created in 1991 by Governor's Executive Order. The six Boards, departments, and Office were placed under the CalEPA umbrella to create a cabinet-level voice for the protection of human health and the environment and to assure the coordinated deployment of state resources. CalEPA oversees hazardous materials and hazardous waste compliance throughout California

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created CalOSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. CalOSHA's

standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared, which establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the Federal RCRA and the California Health and Safety Code (HSC). The HWCL, under CCR 22, Chapter 30, establishes regulations that are similar to RCRA but more stringent in their application and empowers the DTSC to administer the State's hazardous waste program and implement the federal program in California. The DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. The DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment. The DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the CVRWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b) pertains to water quality aspects of waste discharge to land. The regulation establishes waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows regional water boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, the requirements of CCR 23, Chapter 15 applies to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

California Code of Regulations Title 24, Chapter 7A

Chapter 7A of the California Building Code (Title 24, Part 2) establishes construction standards for new buildings located within designated Fire Hazard Severity Zones. These standards address materials and methods for exterior elements such as roofing, attic ventilation, walls, windows, doors, decking, and underfloor areas to reduce wildfire risk. According to CAL FIRE, the City of Clovis is not located in a Fire Hazard Severity Zone.[7]

[7] California Department of Forestry and Fire, 2025. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0 (accessed September 2025).

California Code of Regulations Title 24, Part 9

The California Fire Code (Title 24, Part 9 of the California Code of Regulations) is based on the 2012 International Fire Code and incorporates state-specific amendments. It establishes fire safety building standards that are referenced throughout Title 24.

California Accidental Release Prevention (Cal ARP) Program

The purpose of the Cal ARP program is to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws. The Cal ARP requires any business that handles more than threshold quantities of an extremely hazardous substance per California regulations to develop a Risk Management Plan (RMP). The RMP is implemented by the business to prevent or mitigate releases of regulated substances that could have off-site consequences through hazard identification, planning, source reduction, maintenance, training, and engineering controls. The RMP contains the following elements:

- Safety Information
- A Hazard Review
- Operating Procedures
- Training Requirements
- Compliance Audits
- Incident Investigation Procedures

The 2019 Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for wildfire protection and land stewardship across over 31 million acres of state wildlands. The Office of the State Fire Marshal (OSFM) supports this mission through fire prevention programs, code enforcement, and public education. OSFM activities include regulating fire safety in state-owned buildings, licensing fire protection system inspectors, approving fireworks, and overseeing fire safety standards for materials and pipelines. CAL FIRE classifies Fire Hazard Severity Zones (FHSZ) as Moderate, High, or Very High based on factors such as flame length, ember production, and the likelihood of fire occurrence, using a science-based model that evaluates fire behavior over a 30- to 50-year period.

c. Local Regulations

City of Clovis General Plan, Environmental Safety Element

The following policies of the General Plan Environmental Safety Element related to hazards and hazardous materials are applicable to the proposed project.

- **Policy 1.4 Facilities that use hazardous materials.** Prohibit facilities using, storing, or otherwise involved with hazardous or toxic materials to be located in the 100-year flood zone unless all standards of elevation, flood proofing, and storage have been implemented.
- **Policy 2.1 Safe storage and maintenance.** The use and storage of hazardous materials shall comply with applicable federal, state, and local laws to prevent and mitigate hazardous materials releases.
- **Policy 2.2 Mitigation and remediation of groundwater contamination.** Actively participate in local and regional efforts directed at mitigating environmental exposure to and cleaning up contaminated groundwater.
- **Policy 2.3 Truck routes for hazardous materials**. Maintain designated truck routes for the transportation of hazardous materials through the City. Discourage routes that pass through residential neighborhoods to the maximum extent feasible.
- **Policy 2.4 Hazardous materials response team.** Maintain a Type 1 hazardous materials response team serving the City of Clovis.
- **Policy 2.5 Safer Alternatives.** Minimize the use of hazardous materials by encouraging the selection of non-toxic alternatives that do not pose a threat to the environment.
- **Policy 2.6 Community education**. Provide educational resources to residents and businesses to promote safe practices related to the use, storage, transportation, and disposal of hazardous materials.
- **Policy 3.11 Airport land use compatibility**. Approve land uses in a manner that is consistent with the Fresno Yosemite International Airport Land Use Compatibility Plan.[8]

City of Clovis General Plan, Public Facilities and Services Element

The following policies of the General Plan Public Safety and Services Element related to hazards and hazardous materials are applicable to the proposed project.

- **Policy 6.8 Emergency preparedness planning.** Maintain an emergency operations plan, an emergency operations center, and a hazard mitigation plan to prepare for actual or threatened conditions of disaster or extreme peril.

Certified Unified Program Agency (CUPA)

The California Environmental Protection Agency (CalEPA) designates certain local agencies as CUPA to oversee the implementation of specific hazardous materials and waste management programs at the county level. In Fresno County, this role is fulfilled by the Environmental Health Division of the Fresno County Department of Public Health. As the CUPA, the Environmental Health Division administers programs including but not limited to the regulation of leaking underground storage tanks (LUSTs), Hazardous Materials Business Plan (HMP) requirements, and Cal-ARP programs.

[8] City of Clovis. 2014a. General Plan, Environmental Safety and Public Facilities and Services Elements. https://www.clovisca.gov/services/planning_development/planning/projects/general_plan_update/index.php. (Accessed May 2025).

Responsibilities include permitting, inspections, compliance assistance, investigation, and enforcement.

San Joaquin Valley Air Pollution Control District

The San Joaquin Valley Air Pollution Control District (SJVAPCD) has regulatory authority over air quality in the City of Clovis. The District oversees emissions from both stationary sources (such as dust, smoke, and certain asbestos-related activities) and mobile sources. Its responsibilities include responding to air quality complaints, managing air quality permits, and reviewing development proposals for consistency with applicable air quality and greenhouse gas thresholds. Additional information on air quality and the SJVAPCD's role is provided in Section 4.2, *Air Quality*, of this EA.

Fresno County Local Hazard Mitigation Plan

The City of Clovis participates in the Fresno County Multi-Jurisdictional Hazard Mitigation Plan, which identifies local hazard risks and outlines mitigation strategies to reduce potential impacts to people, property, and infrastructure. The plan identifies dam failure, flooding, hazardous materials incidents, drought, and seismic activity as among the most significant hazards for the area. Clovis enforces a range of hazard-reduction policies through its General Plan Safety Element, zoning and subdivision ordinances, and floodplain management regulations. The City is a participant in the National Flood Insurance Program and coordinates with regional agencies such as the Fresno Metropolitan Flood Control District and the North Kings Groundwater Sustainability Agency to manage flood and water supply risks. For infill development, the City requires compliance with its master drainage plan and site-specific review to ensure that new residential projects do not exacerbate flood risks or conflict with existing hazard mitigation infrastructure. Emergency preparedness is supported by the City's Emergency Operations Plan and public outreach programs. These regulatory and planning frameworks help ensure that residential infill development is consistent with local hazard mitigation objectives and does not expose future residents to significant hazard-related risks.

Fresno County Office of Emergency Services

Emergency preparedness and planning for unincorporated areas within the SOI and broader project area is managed by the Fresno County Office of Emergency Services (OES), a division of the Fresno County Department of Public Health. The OES maintains the Fresno County Operational Area Master Emergency Services Plan, which guides emergency response efforts in these areas. Additionally, the Fresno County Multi-Jurisdictional Local Hazard Mitigation Plan outlines potential hazards, available resources, and agency responsibilities for disaster response and recovery. The City of Clovis and the other incorporated cities in Fresno County coordinate with the County OES on preparedness, response, and recovery activities.

Clovis Fire Department

The Clovis Fire Department (CFD) oversees emergency preparedness and urban search and rescue operations. The department's Special Projects Manager also serves as the Emergency Operations Center coordinator and manages the City's Emergency Operations Plan.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Project impacts to hazards and hazardous materials are evaluated based on the project's adherence to local, state, and federal standards; the nature of demolition, construction, and operational activities; proximity to schools; proximity of hazardous materials sites to the project; proximity to airports and adherence to applicable airport land use standards; compliance with existing emergency response plans; and proximity to wildland areas and potential for fire.

Significance Thresholds

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, an impact related to hazards and hazardous materials would be significant if the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment
5. Result in a safety hazard or excessive noise for people residing or working in the project area 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
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold 2:	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?

Impact HAZ-1 THE PROPOSED INFILL REZONE PROGRAM PROJECT WOULD FACILITATE NEW RESIDENTIAL DEVELOPMENT THAT MAY INVOLVE ROUTINE TRANSPORTATION, USE, OR DISPOSAL OF HAZARDOUS MATERIALS IN CLOVIS NEAR RESIDENTIAL LAND USES. NONETHELESS, REQUIRED COMPLIANCE WITH APPLICABLE REGULATIONS RELATED TO HAZARDOUS MATERIALS AND COMPLIANCE WITH GENERAL PLAN POLICIES WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Operation

Although no specific development projects are proposed as part of the project, development facilitated by the proposed project could facilitate the construction of an estimated 1,303 new residential units in Clovis.

Hazardous materials are typically utilized by most land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreational uses, among other activities. Residential uses do not typically use hazardous materials other than small amounts for cleaning and landscaping. These materials would not be different from household chemicals and solvents already in wide use throughout Clovis. Residents and workers are anticipated to use limited quantities of products routinely for periodic cleaning, repair, and maintenance or for landscape maintenance/pest control that could contain hazardous materials. Those using such products would be required to comply with all applicable regulations regarding the disposal of household waste. Additionally, future development would be required to comply with policies 1.4, 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, and 3.11 of the General Plan Environmental Safety Element (these policies would not change under the proposed updates to this Element under the proposed project), which outline requirements for the handling, storage, disposal, and transport of hazardous materials and household hazardous materials. Therefore, operation of new residential uses poses little risk of exposing the public to hazardous materials.

The proposed project would involve rezoning and land use amendments to accommodate additional housing. The proposed project would not facilitate the establishment of new industrial, warehouse, auto-service, or manufacturing uses. Therefore, the proposed project would not introduce new manufacturing, warehouse, or industrial uses that would sell, use, store, transport, or release substantial quantities of hazardous materials.

Construction Activities

Construction activities associated with development facilitated by the project would include demolition of existing structures, construction of new development, and the replacement and/or improvement of drainage facilities. Although no specific development projects are proposed as part of the project, development facilitated by the proposed project could facilitate the construction of an estimated 1,303 new residential units in Clovis. The following discussion addresses the use of hazardous materials during construction activities, the potential for release of existing

contaminated materials during construction, and the potential for release of LBP or ACM during demolition or construction.

Use of Hazardous Materials During Construction

Construction associated with future development in Clovis may include the temporary transport, storage, and use of potentially hazardous materials including fuels, lubricating fluids, cleaners, or solvents. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials is subject to various federal, State, and local regulations designed to reduce risks associated with hazardous materials, including potential risks associated with upset or accident conditions. Hazardous materials would be required to be transported under U.S. DOT regulations (U.S. DOT Hazardous Materials Transport Act, 49 Code of Federal Regulations), which stipulate the types of containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. In addition, the use, storage, and disposal of hazardous materials are regulated through the RCRA. The California DTSC is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California H&SC Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, California Code of Regulations, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Additionally, Policy 2.1 of the General Plan Environmental Safety Element would continue to require that the handling, storage, and disposal of hazardous materials complies with all applicable local, county, state, and federal laws. Compliance with existing regulations would reduce the risk of potential release of hazardous materials during construction.

Hazardous Materials Transport

Hazardous materials may be transported into, throughout, and near Clovis on N. Academy Avenue from State Route 180 to State Route 168 and State Route 168 from N. Academy Avenue to Huntington Lake Road and Big Creek Road[9] and collector and local streets. Accidents on these roadways could result in the release of hazardous materials.

The U.S. DOT's Office of Hazardous Materials Safety regulates the transportation of hazardous materials, as described in Title 49 of the CFR, and implemented by Title 13 of the CCR. Documentation of compliance with hazardous materials regulations codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code, is required for all hazardous waste transport. In addition, individual contractors and property owners are required to comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to, Title 49 of the CFR. Adherence to applicable regulations and laws would reduce the potential hazards associated with the transport of hazardous materials, including accidental release of hazardous materials during transport.

[9] Federal Motor Carrier Safety Administration. 2024. National Hazardous Materials Route Registry – By State: California. https://www.fmcsa.dot.gov/regulations/hazardous-materials/national-hazardous-materials-route-registry-state (accessed July 2025).

In addition to mandatory adherence to laws and regulations, Policy 2.3 of the Environmental Safety Element of the General Plan, Truck Routes for Hazardous Materials, regulates the transport of hazardous material on Clovis streets. The policy states that the City must maintain designated truck routes for the transportation of hazardous materials through the City and discourage routes that pass through residential neighborhoods to the maximum extent feasible further reduces potential impacts to residential areas from the transportation of hazardous materials. These designated routes, identified above, are registered in the U.S. DOT's Federal Motor Carrier Safety Administration National Hazardous Materials Route Registry. Following these laws and regulations reduces the risk of accidental release of hazardous materials in transport.

Hazardous Materials Use and Disposal

Although the overall quantity of hazardous materials used and requiring disposal in Clovis could incrementally increase as a result of implementation of the proposed project, all new development that uses hazardous materials would be required to comply with the regulations, standards, and guidelines established by the U.S. EPA, the State of California, Fresno County, and Clovis related to storage, use, and disposal of hazardous materials.

As described above in the Regulatory Setting discussion, the Fresno County Department of Environmental Health, the Clovis Local Hazard Mitigation Plan and the Clovis General Plan aim to minimize community exposure to hazardous and potentially hazardous materials by avoiding toxic cleaning and building materials and products in civic facilities and services; providing information, opportunities, and incentives to the community for proper disposal of toxic materials; and encouraging non-toxic materials and products in homes and businesses as an alternative to products containing potentially hazardous materials. Additionally, future development would be required to comply with existing policies 2.1, 2.4, 2.5, and 2.6 of the General Plan Environmental Safety Element. These policies outline requirements for the handling, storage, and disposal of hazardous materials and minimizing the use of toxic and hazardous household products. Compliance with these policies would further prepare the city, and protect the public, in the event of an accidental spill or exposure, and would reduce the potential for accidental exposure and hazards associated with the use and disposal of hazardous materials.

Demolition and Redevelopment Activities

Infill development under the proposed project could involve demolition of existing structures. Demolition could result in the release and exposure of construction workers to lead and asbestos. However, lead-based materials and asbestos exposure are regulated by CalOSHA. CCR Section 1532.1 requires testing, monitoring, containment, and disposal of lead-based materials such that exposure levels do not exceed CalOSHA standards. Under this rule, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Section 1529 sets requirements for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety gear wear, communication of hazards, and medical examination of workers.

The control of asbestos during demolition or renovation of buildings is regulated under the Federal Clean Air Act (FCAA). The FCAA requires a thorough inspection for asbestos where demolition will occur and specifies work practices to control emissions, such as removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in

leak tight containers, and disposing of the asbestos-containing waste material as expediently as practicable.[10] Compliance with the CCR and FCAA would reduce the potential hazards and risks associated with release of lead and asbestos to a less than significant level. Additionally, Policies 2.1-2.6 of the City of Clovis General Plan Environmental Safety Element would continue to ensure that hazardous building materials removed during redevelopment activities are properly handled and disposed of.

Demolition of housing and other residential uses would not require the use of hazardous materials in demolition activities and thereby pose little risk of exposing the public to hazardous materials. Residential uses associated with future developments facilitated by the project would be subject to compliance with CCR, CalOSHA, and other agencies to ensure hazardous materials risks to the public are also minimized.

Summary

Compliance with existing applicable regulations and programs would minimize risks from routine transport, use, and disposal of hazardous materials, including potential hazards from the accidental release of hazardous materials, associated with possible future development under the Infill Rezone Program. Oversight by the appropriate federal, State, and local agencies and compliance by new development and new Clovis residents with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these materials. Therefore, impacts from a hazard to the public or the environment through routine transport, use, or disposal of hazardous materials, or from accidental release or exposure to these materials would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-2 THE PROPOSED PROJECT WOULD NOT EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed Infill Rezone Program project would facilitate residential development at a higher density than currently allowed under existing zoning. As shown in Figure 4.7-1 through Figure 4.7-6, the proposed project would facilitate development within 0.25 miles of the six identified schools[11] and various pre-schools and childcare facilities throughout Clovis. However, as described above under Impact HAZ-1, the proposed project would not involve new industrial or manufacturing uses. Hazardous materials and waste generated from reasonably foreseeable development accommodated under the proposed project would not pose a health risk to nearby schools or childcare facilities as a majority of these developments would be residential, which is a use that does not typically handle or emit hazardous materials or substances. Residential uses may involve

[10] United States Environmental Protection Agency (USEPA). 2024. Overview of the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). https://www.epa.gov/asbestos/overview-asbestos-national-emission-standards-hazardous-air-pollutants-neshap (accessed May 2025).

[11] Identified schools include Valley Crescent School, Garfield Elementary School, Charlie Keyan Armenian Community School, Jefferson Elementary School, Sierra View Christian Academy, and Tarpey Elementary School.

use and storage of some materials considered hazardous, though primarily these would be limited to solvents, paints, chemicals used for cleaning and building maintenance, and landscaping supplies. These materials would not be different from household chemicals and solvents already in general and wide use throughout Clovis. Uses in Clovis that sell, use, store, generate, or release hazardous materials must adhere to applicable federal, State, and local safety standards, ordinances, and regulations.

As mentioned in Impact HAZ-1, construction facilitated by the proposed project may include the temporary transport, storage, and use of potentially hazardous materials including fuels, paints, lubricating fluids, cleaners, or solvents. Specifically, demolition, grading, and excavation activities associated with new construction may result in emissions and transport of hazardous materials. Further, the Infill Rezone Program sites subject to rezoning and land use amendments may have unrecorded pre-existing contamination that could be exposed during grading or construction activities. However, adherence to applicable policies regarding emission and transport of hazardous materials such as the TSCA, the RCRA, and the Hazardous Waste Control Act, as listed the Regulatory Setting and under Impact HAZ-1, would ensure potential impacts would be reduced.

Additionally, compliance with General Plan Environmental Safety Element policies would further reduce impacts. Therefore, potential impacts associated with hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-3 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD ACCOMMODATE DEVELOPMENT ON OR NEAR HAZARDOUS MATERIALS SITES. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS AND STANDARD CONDITIONS OF APPROVAL REQUIRING SITE CHARACTERIZATION AND CLEANUP WOULD MINIMIZE HAZARDS FROM DEVELOPMENT ON CONTAMINATED SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Existing sites that use or have historically used hazardous materials or that may contain contaminants in soils or groundwater in the city include large and small-quantity generators of hazardous waste, such as gas stations and dry cleaners. As described in Section 4.7.1, *Setting*, Clovis has 41 closed LUST sites, 1 open LUST site, 10 closed cleanup program sites, 2 voluntary agreement sites with no further action needed, and 8 school investigations with no further action needed.[12,13]

None of the Infill Rezone Program sites have any active or open LUST cleanup sites or other active or open hazardous materials sites pursuant to Government Code Section 65962.5.[14] As shown in Figure 4.7-5, Rezone Site 161 is located 182 feet away from a closed LUST cleanup site (gas station and liquor store), and as shown in Figure 4.7-4, Rezone Site 589 is located on a closed cleanup program site (Roger's Helicopters, an aviation services provider). California Supreme Court in a

[12] [12] Department of Toxic Substances Control (DTSC). 2025. EnviroStor Database. https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Clovis&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True
[13] State Water Resources Control Board (SWRCB). 2025. GeoTracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=clovis
[14] Ibid.

December 2015 opinion (BIA v. BAAQMD) confirmed CEQA is concerned with the impacts of a project on the environment, not the effects the existing environment may have on a project; therefore, potential hazards impacts to future new residents on the rezone sites would not be an impact under CEQA.

However, redevelopment of the Infill Rezone Program sites with existing soil or groundwater contamination could potentially pose a significant hazard to the public or the environment through releases of hazardous materials into the environment. The extent to which soil or groundwater may be affected by LUST, metals, lead, or other potential contamination source, if at all, depends on the type of contaminant, the amount released, the duration of the release, distance from source, and depth to groundwater. If groundwater contamination is identified, characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the Regional Water Quality Control Board prior to the commencement of any new construction activities that would disturb the subsurface. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the Regional Water Quality Control Board, depending upon the nature of any identified contamination. Further, the City of Clovis General Plan Environmental Safety Element as listed in Section 4.7.2, *Regulatory Setting*, provides measures to lessen the impact of sites contaminated with hazardous materials. For example, Policy 2.1, which requires the use and storage of hazardous materials comply with all applicable federal state, and local laws, Policy 2.2, *Mitigation and remediation of groundwater remediation*, which requires City participation in local efforts directed at mitigating environmental exposure to and cleaning up contaminated groundwater, and Policy 2.4, which maintains a Type 1 hazardous materials response team for the City of Clovis.

Given that the hazardous materials sites located near the Infill Rezone Program sites are closed, and, and that no Infill Rezone Program sites are located near an open LUST site, development facilitated in their vicinity would not expose construction workers nor future occupants to hazardous materials sites. Compliance with federal, State, and local regulations, including the General Plan policies listed above, would reduce potential impacts associated with development on a closed hazardous materials site. Therefore, the impact of posing a significant hazard to the public or the environment through the release of hazardous materials associated with implementation of the proposed project would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 5:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-4 THE PROPOSED PROJECT WOULD NOT RESULT IN A SAFETY HAZARD OR EXCESSIVE NOISE RELATED TO AIRPORT OPERATION FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA. MITIGATION WOULD NOT BE REQUIRED, AND THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The airport nearest to the City of Clovis boundary, FYI is located approximately 3.5 miles southwest of the City center. The Infill Rezone Program sites are located outside of the CNEL contours generated by the Fresno County Council of Governments ALUCP. Five of the proposed Infill Rezone

Program sites, however, are located within Safety Compatibility Zone 6, the Traffic Pattern Zone as shown in Figure 4.7-7. There are no restrictions on land uses or on special characteristics (distracting lights or glare, sources of smoke or electrical interference, or attractors of birds) in Zone 6.

Height limitations are imposed on projects within an airport hazard area so that structures or trees do not obstruct the airspace required for the flight of aircraft in landing or taking off at an airport or are otherwise hazardous to the landing or taking off of aircraft. The Airspace Protection Surface associated with the nearby airport extends 10,000 feet horizontally from the runway at an elevation of 150 feet above airport elevation (486 feet above mean sea level [amsl]), then continues upward at a slope of 1 vertical foot to 20 horizontal feet for an additional 4,000 feet, reaching an elevation of 686 feet amsl. Within the City of Clovis, ground elevations under this surface range from approximately 335 feet amsl near the airport to 686 feet amsl at the northeastern extent. Allowable structure heights vary depending on location within this zone. Existing development in Clovis remains well below these height limits. Future development under the proposed Infill Rezone Program would be subject to FAA airspace protection regulations. [15] Therefore, potential impacts related to airspace protection are considered less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-5 THE PROPOSED PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. MITIGATION WOULD NOT BE REQUIRED, AND THE IMPACT WOULD BE LESS THAN SIGNIFICANT.

Fresno County's Master Emergency Services Plan functions as the primary emergency response framework for the unincorporated areas of the Fresno County Operational Area. It also supports coordination with other jurisdictions during regional emergencies.

The County has also adopted a Multi-Jurisdictional Hazard Mitigation Plan, most recently updated in 2024. This plan outlines strategies to reduce risks from natural and human-made hazards and supports eligibility for federal disaster assistance programs, including Federal Emergency Management Agency's Hazard Mitigation Grant Program, Pre-Disaster Mitigation Program, and Flood Mitigation Assistance. It also contributes to compliance with the National Flood Insurance Program's Community Rating System, potentially reducing flood insurance premiums in participating communities.

In the event of an emergency, major roadways in Fresno County may be used for evacuation, depending on the nature and location of the incident. The proposed project does not include any physical development and would not interfere with adopted emergency response or evacuation plans. Due to the lack of physical development, there are no planned construction activities that would be anticipated to result in significant road closures or traffic disruptions that would impede emergency access. Any construction requiring traffic control would be subject to City-approved traffic management plans. Compliance with General Plan policies as listed in Section 4.9.2, *Regulatory Setting*, would further ensure that development facilitated by the project would not

[15] City of Clovis. 2014b. General Plan EIR. Accessed May 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

result in the impairment of implementation or physical interference with evacuation or emergency response plans. Therefore, the project would result in a less than significant impact related to emergency response and evacuation.

Mitigation Measures

No mitigation measures are required.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-6 THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Refer to Section 4.16 *Effects Found Not to Be Significant*, for a discussion of impacts related to wildfire. In particular, this analysis concludes that the Infill Rezone Program sites are not in or near moderate, high and very high fire hazard severity zones. As such, the project would not increase the likelihood of people or structures to be exposed to significant risk of loss, injury, or death involving wildland fires. The impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.7.4 Cumulative Impacts

The geographic scope for cumulative hazardous materials impacts is limited to projects within 0.25 mile of future development sites. This geographic scope is appropriate for hazardous materials because risks associated with hazards and hazardous materials occur largely in a site-specific and localized context as adverse impacts from a hazardous materials release or spill diminish in magnitude with distance. Cumulative residential development in the vicinity of any identified hazardous materials sites would gradually increase the population exposed to the use and transport of hazardous materials; the routine use, storage, and disposal of hazardous materials; and listed hazardous materials sites. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Implementation of existing laws and regulations, including remedial action on contaminated sites, as discussed with regard to the project under Impacts HAZ-1 through HAZ-5, would avoid potential hazard impacts.

Overall, hazards and hazardous materials impacts associated with individual developments are site specific in nature and must be addressed on a case-by-case basis. Since hazards and hazardous materials are required to be examined as part of the existing permit application and review process, potential impacts associated with individual projects would be adequately addressed prior to permit approval. In summary, all work needs to be monitored and follow best practices in order to minimize potential impacts. With adherence to existing regulatory standards and proposed new General Plan policies for hazardous materials, no significant cumulative human health impacts would occur, and the project would not have a cumulatively considerable contribution to a significant cumulative impact related to hazards and hazardous materials.

Mitigation Measures

No mitigation measures are required.

4.8 Hydrology and Water Quality

This section evaluates the potential environmental effects related to hydrology and water quality associated with implementation of the proposed project.

4.8.1 Setting

Watershed

The California Department of Water Resources divides surface watersheds in California into 10 hydrologic regions. Clovis lies within the San Joaquin Hydrologic Region (San Joaquin Region), which contains 16 alluvial groundwater basins, covers approximately 15,200 square miles, and includes major portions of San Joaquin, Stanislaus, Merced, Madera, and Fresno County. These counties are part of the agriculturally rich Central Valley and rely heavily on groundwater for irrigation and municipal use.[1] The San Joaquin Region comprises numerous rivers including the San Joaquin, Stanislaus, Tuolumne, Merced, and Mokelumne River. These rivers are critical for surface water supply, recharge of groundwater basins, and ecological health.

Clovis is located in the eastern portion of California's San Joaquin Valley. The area is influenced by several major watersheds, including those of the San Joaquin, Merced, and Kings Rivers, which contribute to the region's surface and groundwater systems. Clovis is situated near the Kings River watershed, which plays a significant role in local water supply and groundwater recharge. The region includes a network of canals and creeks that support agricultural and urban water needs. These waterways ultimately contribute to the San Joaquin River, which flows northward and eventually joins the Sacramento–San Joaquin Delta, connecting to the San Francisco Bay.

Groundwater

Clovis lies within the San Joaquin Valley Groundwater Basin, specifically the Kings Subbasin, for which the North Kings Groundwater Sustainability Agency (GSA) serves as the designated Groundwater Sustainability Agency. Water supply in Clovis is provided by the City of Clovis Public Utilities Department, which sources water from a combination of surface water from the Kings River, groundwater wells, and treated imported water. The majority of the surface water originates from the Kings River watershed, with supplemental supplies from the Fresno Irrigation District. Groundwater recharge and management projects planned or implemented by local agencies, including the North Kings GSA and Fresno Irrigation District, allow for greater flexibility in response to changing conditions such as single-year or multi-year droughts.

Water Quality

Groundwater from the Kings Subbasin of the San Joaquin Valley Groundwater Basin is generally of good quality and is monitored by the North Kings GSA, which includes the City of Clovis as a member agency. Groundwater quality and levels are tracked through a network of monitoring wells across the subbasin. The North Kings GSA and its partners, including the Fresno Irrigation District, prepare regional groundwater monitoring reports to assess trends in groundwater levels, quality, and recharge activities. Recent assessments indicate that groundwater in the Kings Subbasin is generally of good quality, with most constituents below the secondary maximum contaminant levels (SMCLs).

[1] California Department of Water Resources (CDW). 2020. California's Groundwater Update 2020. Available: https://data.cnra.ca.gov/dataset/calgw_update2020/resource/d2b45d3c-52c0-45ba-b92a-fb3c90c1d4be. Accessed May 2025.

The monitoring efforts also evaluate the quality of surface water and stormwater used for managed aquifer recharge (MAR) projects. These recharge efforts, particularly during wet years, help replenish the aquifer and support long-term sustainability. The Central Valley Regional Water Quality Control Board (CVRWQCB) is the primary agency responsible for protecting and enhancing surface and groundwater quality in the region. The CVRWQCB designates beneficial uses for water bodies, sets water quality objectives, and implements programs to maintain or improve water quality.

Flood Hazards

Floodplains are areas that are subject to recurring inundation and flooding located adjacent to rivers, streams, and coastal areas. Floodplains are described in terms of statistical likelihood of flooding in a given year, e.g., a 100-year floodplain has a one percent chance of flooding in any year, while a 500-year floodplain has a 0.2 percent chance of flooding in any year.

The Federal Emergency Management Agency (FEMA) establishes base flood elevations (BFE) for 100-year and 500-year flood zones and establishes Special Flood Hazard Areas (SFHA). SFHAs are those areas within 100-year flood zones or areas that will be inundated by a flood event having a one percent chance of being equaled or exceeded in any given year. The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas. Portions of the City of Clovis are located within flood hazard zones as mapped by FEMA and SFHAs as mapped by Flood Disaster Protection Act of 1973.[2]

4.8.2 Regulatory Setting

a. Federal Regulations

Federal Clean Water Act

In 1972, Congress passed the Federal Water Pollution Control Act, commonly known as the CWA, with the goal of "restor[ing] and maintain[ing] the chemical, physical, and biological integrity of the Nation's waters" (33 U.S.C. § 1251(a)). The CWA directs states to establish water quality standards for all "waters of the United States" and to review and update such standards on a triennial basis. Section 319 mandates specific actions for the control of pollution from non-point sources. The Environmental Protection Agency (EPA) has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the National Pollutant Discharge Elimination System (NPDES) Program, to the California State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Boards (RWQCBs). The CVRWQCB is the CWA enforcement agency for the Central Valley, including Fresno County.

Section 303(c)(2)(b) of the CWA requires states to adopt water quality standards for all surface waters of the United States based on the water body's designated beneficial use. Water quality standards are typically numeric, although narrative criteria based upon biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. Applicable water quality standards are contained in the CVRWQCB

[2] Federal Emergency Management Agency (FEMA). 2025. FEMA Flood Map Service Center. Available: https://msc.fema.gov/portal/search?AddressQuery=Clovis. Accessed May 2025.

Basin Plan which analyzes the hydrologic units and subregions of the Central Valley, including Fresno County.

Section 303(d) of the CWA bridges the technology-based and water quality-based approaches for managing water quality. Section 303(d) requires that states make a list of waters that are not attaining standards after the technology-based limits are put into place. For waters on this list (and where the U.S. EPA administrator deems they are appropriate), states are to develop total maximum daily loads (TMDL). TMDLs are established at the level necessary to implement the applicable water quality standards. A TMDL must account for all sources of the pollutants that caused the water to be listed.

Section 404 of the CWA prohibits the discharge of any pollutants into "waters of the United States," except as allowed by permit. (33 Code of Federal Resources § 328.3(a)(3).) Section 404 of the CWA authorizes the U.S. Army Corps of Engineers to issue permits for and regulate the discharge of dredged or fill materials into wetlands or other waters of the United States. Under the CWA and its implementing regulations, "waters of the United States" are broadly defined to consist of rivers, creeks, streams, and lakes extending to their headwaters, including adjacent wetlands.

National Pollutant Discharge Elimination System

In California, the NPDES program is administered by the SWRCB through the nine RWQCBs. Clovis lies within the jurisdiction of CVRWQCB (Region 5) and is subject to the waste discharge requirements of the Regional Phase I Municipal Separate Storm Sewer Systems (MS4) Permit (Order No. R4-2021-0105) and NPDES Permit No. CAS004004, which was adopted on July 23, 2021, became effective on September 11, 2021, and is set to expire on September 10, 2026.

MS4 permit requirements include reduction of pollutant discharges to the 'maximum extent practicable' and protection of water quality. Requirements also include identification of major outfalls and pollutant loads and control of discharges from new development and redevelopment. To address these objectives, municipalities are required to prepare stormwater management plans. Although the NPDES program does not regulate nonpoint sources of pollution, the CVRWQCB has other programs in place to address nonpoint sources.

Federal Emergency Management Agency

FEMA establishes BFEs for 100-year and 500-year flood zones and establishes SFHAs. SFHAs are those areas within 100-year flood zones or areas that will be inundated by a flood event having a one percent chance of being equaled or exceeded in any given year. The 500-year flood zone is defined as the area that could be inundated by the flood which has a 0.2 percent probability of occurring in any given year, or once in 500 years, and is not considered an SFHA. There are FEMA-designated 100-year Flood Hazard Areas throughout city limits, however, the Clovis General Plan Environmental Safety Element, Policy 1.1 (Flood Zone) prohibits development within the 100-year flood zone and dam inundation areas unless adequate mitigation is provided against flood hazards.[3]

In 2000, FEMA adopted revisions to 44 Code of Federal Regulations (CFR), known as the Disaster Mitigation Act (DMA) or DMA 2000. Section 322 (a-d) of the DMA 2000 requires local governments to have a Hazard Mitigation Plan (HMP) as a condition of receiving federal disaster mitigation funds. The HMP must:

[3] City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed May 2025.

- Describe the process for assessing hazards, risks, and vulnerabilities.
- Identify and prioritize mitigation actions.
- Solicit input from the community (public), key stakeholders, and adjacent jurisdictions and agencies.

Clovis's HMP is discussed under *Local Regulations,* below.

National Flood Insurance Act / Flood Disaster Protection Act

The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in SFHA. These laws are relevant because they lead to mapping of regulatory floodplains and to local management of floodplain areas according to guidelines that include prohibiting or restricting development in flood hazard zones. There are portions of Clovis located within the SFHA.[4]

National Toxics Rule and California Toxics Rule

In 1992, U.S. EPA promulgated the National Toxics Rule, 40 CFR 131, establishing numeric criteria for priority toxic pollutants in multiple states in order to bring all states into compliance with the Water Quality Standards (WQS) requirements of section 303(c) of the CWA. The National Toxics Rule established WQS for 42 pollutants not covered under California's statewide water quality regulations at that time. After the court ordered revocation of California's statewide Basin Plans in September 1994, U.S. EPA initiated efforts to promulgate additional federal WQS for California. In May 2000, U.S. EPA issued the California Toxics Rule, which includes all the priority pollutants for which the EPA has issued numeric criteria not included in the National Toxics Rule.

Safe Drinking Water Act

The Federal Safe Drinking Water Act was enacted in 1974, allowing the U.S. EPA to promulgate national primary drinking water standards specifying Maximum Contaminants Levels (MCLs) for each contaminant present in a public water system with an adverse effect on human health. Primary MCLs have been established for approximately 90 contaminants in drinking water. The U.S. EPA has also adopted secondary MCLs as non-enforceable guidelines for contaminants that may cause cosmetic or aesthetic effects. States have the discretion to adopt them as enforceable standards. U.S. EPA has delegated to the SWRCB the responsibility for administering California's drinking-water program. In 1976, California adopted its own safe drinking water act (see *California Safe Drinking Water Act* described below).

b. State Regulations

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of State waters

[4] Federal Emergency Management Agency (FEMA). 2025. FEMA Flood Map Service Center. Available: https://msc.fema.gov/portal/search?AddressQuery=Clovis. Accessed June 2025.

through the issuance of waste discharge requirements (WDRs) and through the development of TMDLs. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with the Porter-Cologne Act.

The Central Valley Regional Water Quality Control Plan is the Basin Plan that covers Fresno County and is discussed under *Local Regulations,* below.

California Safe Drinking Water Act

The U.S. EPA has delegated to the California Department of Public Health responsibility for administering California's drinking-water program. In 1976, two years after the Federal Safe Drinking Water Act was passed, California adopted its own safe drinking water act (contained in the Health and Safety Code) and adopted implementing regulations (contained in 22 California Code of Regulations (CCR)). California's program sets drinking water standards that are at least as stringent as the Federal standards. Each community water system also must monitor for a specified list of contaminants, and the monitoring results must be reported to the state. Responsibility for the state's Drinking Water Program was transferred from the Department of Public Health to the Division of Drinking Water, which is a division of the SWRCB that was created in July 2014.

California General Plan Law, Government Code Section 65302

Government Code Section 65302(a) requires cities and counties located within the State to review the Land Use, Conservation, and Safety elements of the general plan "for the consideration of flood hazards, flooding, and floodplains" to address flood risks. The code also requires cities and counties in the State to annually review the Land Use element with respect to "those areas covered by the plan that are subject to flooding identified by floodplain mapping prepared by FEMA or the California Department of Water Resources."

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater, provides for the creation of regional GSAs and requires Groundwater Sustainability Plans (GSP) to be developed for medium- and high-priority groundwater basins. The Kings Subbasin is a High Priority Basin; in response to creating the North Kings Groundwater Sustainability Agency (NKGSA), formed in December 2016. The NKGSA's GSP was recommended for approval in March 2023 by the Department of Water Resources.

Cobey-Alquist Floodplain Management Act

The Cobey-Alquist Floodplain Management Act (Water Code Section 8400-8435) gives support to the National Flood Insurance Program (NFIP) by encouraging local governments to plan, adopt, and enforce land use regulations for floodplain management, to protect people and property from flooding hazards. The Act also identifies requirements that jurisdictions must meet to receive State financial assistance for flood control.

California Green Building Standards Code

The California Green Building Standards Code (24 CCR, Part 11) includes mandatory measures for residential and nonresidential development. For example, Section 4.106.2 requires residential projects that disturb less than one acre and are not part of a larger common plan of development to manage stormwater drainage during construction through on-site retention basins, filtration systems, and/or compliance with a stormwater management ordinance. Section 5.106.1 requires newly constructed nonresidential projects and additions of less than one acre to prevent the pollution of stormwater runoff from construction through compliance with a local ordinance or implementing Best Management Practices (BMPs) that address soil loss and good housekeeping to manage equipment, materials, and wastes. Section 5.303 sets measures for indoor water use for non-residential development requiring metering devices to conserve water.

California Construction Stormwater Permit

The California Construction Stormwater Permit (Construction General Permit), adopted by the SWRCB, regulates construction activities that include soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 CFR 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit.
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters.
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards.
- Perform inspections and maintenance of all BMPs.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment and pollutants from construction materials, and address post construction runoff. The SWPPP also includes a plan for inspection and maintenance of all BMPs, as well as procedures for altering or increasing BMPs based on changing project conditions.

c. Regional Regulations

Central Valley Regional Water Quality Control Board

Regional authority for planning, permitting, and enforcement is delegated to the nine RWQCBs. The regional boards are required to formulate and adopt water quality control plans for all areas in the region and establish water quality objectives in the plans. Clovis is within the jurisdiction of the CVRWQCB (Region 5) and specifically falls within the Tulare Lake Basin portion of Region 5.

The CVRWQCB Tulare Lake Basin addresses region-wide water quality issues through the Basin Plan, updated most recently in May 2018. This Basin Plan designates beneficial uses of the state waters in

Region 5, describes the water quality that must be maintained to support such uses, and provides programs, projects, and other actions necessary to achieve the standards established in the Basin Plan.[5]

Fresno Metropolitan Flood Control District

The Fresno Metropolitan Flood Control District (FMFCD) manages stormwater and flood control infrastructure, provides local drainage services, supports development with engineering design, reviews drainage plans, and addresses stormwater impacts in environmental reviews. The district's local storm water development drainage system consists of storm drains, detention and retention basins, and pump stations. The district's Storm Drainage and Flood Control Master Plan includes 158 drainage areas, each providing service to approximately one to two square miles. All but five of the developed drainage areas are served by a retention or detention facility. Local drainage services include topographic mapping, Master Plan engineering and facility design; system construction, operation, and maintenance; and engineering design services to ensure adequate drainage for new development.[6]

d. Local Regulations

City of Clovis General Plan

Clovis's General Plan was adopted in August 2014 and consists of Land Use, Economic Development, Circulation, Housing, Public Facilities and Services, Environmental Safety, Open Space and Conservation, and Air Quality Elements. The General Plan lists several goals, policies, and actions as part of each element.

Open Space and Conservation Element

The Open Space and Conservation Element seeks to protect and preserve open space, productive agricultural areas, and environmental resources. This element also establishes goals for the conservation and protection of the quality of water and energy resources. The overarching goal of the element is to create recreation and open space that enhances quality of life, contributes to a healthy community, and conserves Clovis' natural and cultural resources. The element also works in coordination with other plans like the City of Clovis Parks Master Plan and the Urban Forest Management Plan.[7]

Environmental Safety Element

The Environmental Safety Element focuses the protection of the community from environmental and man-made hazards. The overarching goal of the element is creating a well-prepared community that understands and limits exposure to potential natural and human-made hazards and effectively responds to and recovers from public safety emergencies.[8]

[5] California Regional Water Quality Control Board Central Valley Region. 2018. Water Quality Control Plan for the Tulare Lake Basin Third Edition. Available: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/tularelakebp_201805.pdf. Accessed May 2025.
[6] Fresno Metropolitan Flood Control District. 2025. Development in Fresno/Clovis. Available: https://www.fresnofloodcontrol.org/development-in-fresno-clovis/. Accessed June 2025.
[7] City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed May 2025.
[8] Ibid.

Public Facilities and Services Element

The Public Facilities and Services Element defines the nature and types of public facilities, services, and activities necessary to maintain a high quality of life in Clovis. The overarching goal of the element is having a full range of high-quality public services that sustains Clovis as the preeminent community in the Central Valley.[9]

Clovis Municipal Code

The Clovis Municipal Code (CMC) establishes regulations that govern the City of Clovis. Title 4, *Public Safety*, of the CMC describes the City's public safety standards and requirements to reduce hazards including hydrologic hazards. Chapter 6.7, *Urban Storm Water Quality Management and Discharge Control*, of Title 6, *Sanitation and Health*, of the CMC establishes development measures and requirements to reduce stormwater pollution, erosion, and other forms of water pollution.

Fresno County Local Hazard Mitigation Plan

The City of Clovis participates in the Fresno County Multi-Jurisdictional Hazard Mitigation Plan, which identifies local hazard risks and outlines mitigation strategies to reduce potential impacts to people, property, and infrastructure. The plan identifies dam failure, flooding, hazardous materials incidents, drought, and seismic activity as among the most significant hazards for the area. Clovis enforces a range of hazard-reduction policies through its General Plan Environmental Safety Element, zoning and subdivision ordinances, and floodplain management regulations. The City is a participant in the NFIP and coordinates with regional agencies such as the FMFCD and the North Kings Groundwater Sustainability Agency to manage flood and water supply risks. For infill development, the City requires compliance with its master drainage plan and site-specific review to ensure that new residential projects do not exacerbate flood risks or conflict with existing hazard mitigation infrastructure. Emergency preparedness is supported by the City's Emergency Operations Plan and public outreach programs. These regulatory and planning frameworks help ensure that residential infill development is consistent with local hazard mitigation objectives and does not expose future residents to significant hazard-related risks.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

This section describes the potential environmental impacts of development facilitated by the project as relevant to hydrology, water quality, and flood risk. The impact analysis is based on an assessment of baseline conditions for the Infill Rezone Program, including surface water, groundwater, and floodplain information gathered from the City of Clovis, Fresno County, and multiple state and federal agencies, as described above under Section 4.8.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the development facilitated by the proposed project.

[9] City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed May 2025.

Significance Thresholds

The following thresholds of significance are based on Appendix G to the *California Environmental Quality Act (CEQA) Guidelines*. For the purposes of this EA, project implementation may have a significant adverse impact if it would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. 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.
4. 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 or amount of surface runoff in a manner which would result in flooding on- or off-site.
5. 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 that 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.
6. 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.
7. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
8. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT VIOLATE WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS, OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUNDWATER QUALITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities associated with development facilitated by the project would include demolition of existing structures, construction of new development, and the replacement and/or improvement of drainage facilities. Similar to existing conditions, construction activities could result in soil erosion due to earth-moving activities such as excavation, grading, soil compaction and moving, and soil stockpiling. Elevation and slope vary minimally throughout the City. Runoff during storm events typically occurs as sheet flow across the site, and the types of pollutants contained in runoff may include sediment and other existing contaminants such as nutrients, pesticides, herbicides, trace metals, and hydrocarbons that can attach to sediment and be transported

downstream through erosion via overland flow, ultimately entering nearby waterways and contributing to degradation of water quality.

Similar to existing conditions, construction activities would utilize hazardous materials such as diesel fuel, gasoline, lubricant oils, hydraulic fluid, antifreeze, transmission fluid, cement slurry, and other fluids required for the operation of construction vehicles or equipment. These types of hazardous materials are not acutely hazardous, and storage, handling, use, and disposal of these materials are regulated by county, state, and federal regulations and compliance with applicable standards discussed under *Regulatory* Setting. Transport of these materials to and from construction sites would also be regulated under multiple authorities as discussed in Section 4.7, *Hazards and Hazardous Materials*.

Development facilitated by the proposed project would be required to comply with State and local water quality regulations designed to control erosion and protect water quality during construction, as discussed in *Regulatory Setting,* above. This includes compliance with the requirements of the SWRCB Construction General Permit, which requires preparation and implementation of a SWPPP for projects that disturb one acre or more of land. Grading and drainage plans accompanying the permit application must include BMPs for erosion prevention and sediment control, fencing at waterways and in sensitive areas, and limitation of disturbed areas through temporary features. The permit applications must also demonstrate compliance with NPDES MS4 permit provisions.

Compliance with existing regulations and policies discussed above would reduce the risk of water degradation from soil erosion and other pollutants related to construction activities. Because violations of water quality standards would be minimized through existing regulations, impacts to water quality from construction activities from development facilitated by the project would be less than significant.

Operation

Development facilitated by the project is likely to increase impervious surfaces throughout the Infill Rezone Program sites as most of the sites are currently vacant and would be developed as infill, with only few being developed or underdeveloped sites. The project is subject to the Fresno-Clovis Urban Area MS4 Permit (NPDES No. CA0083500), issued by the CVRWQCB Region 5, which includes post-construction stormwater management requirements. Compliance with these standards through the installation of the proposed stormwater basin and implementation of low-impact development (LID) features ensures that the project would not violate water quality standards or waste discharge requirements, nor would it substantially degrade surface or groundwater quality. Therefore, the impact would be considered less than significant.

As described in *Regulatory Setting*, above, the post-construction requirements of the Region 5 MS4 Permit authorize permitting agencies to enforce BMPs that control operational stormwater runoff and protect water quality. Enforcement of post-construction BMPs required under the Region 5 MS4 Permit is carried out by the City Manager or their designated representatives, as authorized under CMC Chapter 6.7, *Urban Storm Water Quality Management and Discharge Control*. Title 6 of the CMC, establishes development measures and requirements to reduce stormwater pollution, erosion, and other forms of surface and ground water pollution.

Compliance with the various regulations and permit requirements such as those under the NPDES program and applicable Water Quality Control Plans like the Basin Plan helps reduce water quality impacts during both construction and operation of projects within the Clovis Region. Adherence to County or municipal General Plan policies further ensures that runoff and pollutants are managed

effectively, preventing their discharge from Infill Rezone Sites. While these measures may not entirely eliminate water quality impacts for every individual project, they significantly reduce the potential for violations of water quality standards or waste discharge requirements. As a result, such impacts are considered less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	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?
Threshold 8:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD NOT INTERFERE SUBSTANTIALLY WITH GROUNDWATER SUPPLIES OR RECHARGE SUCH THAT THE PROJECT MAY IMPEDE WATER QUALITY CONTROL PLAN SUSTAINABLE GROUNDWATER MANAGEMENT OF LOCAL GROUNDWATER BASINS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Clovis's water supply comes from two sources; imported water from the Kings River and groundwater. As described in *Setting*, above, the CVRWQCB is the primary agency responsible for protecting and enhancing surface and groundwater quality for the City of Clovis. Clovis is within the jurisdiction of the CVRWQCB (Region 5) and specifically falls within the Tulare Lake Basin portion of Region 5. The Tulare Lake Basin is considered a high priority under SGMA and is required to develop a GSP.

Development facilitated by the proposed project could increase the demand for water within the city. However, the city's commitment to water efficiency through conservation measures, programs, and adherence to state and federal regulations positions allows for the accommodation of an increased demand if necessary. A Water Supply Assessment (WSA) was completed for the proposed project and prepared by Provost & Pritchard Consulting Group in May 2025 and the analysis confirms that the city has sufficient water resources to meet this increased demand without substantially depleting groundwater supplies or interfering with groundwater recharge. The WSA estimates an increase of 104.63 acre-feet per year (AFY) in water demand, which represents only 0.65 percent of the city's projected excess supply in 2030 under normal year conditions (Appendix E). As of 2025, the City of Clovis has the capacity to treat and deliver up to 22.5 million gallons per day of potable water with planned infrastructure to expand that to 45 million gallons per day when needed.[10] The City of Clovis anticipates significant population growth, from approximately 122,350 in 2020 to 178,109 by 2040. To meet this demand, the city plans to rely on a diversified water portfolio including the Kings Subbasin, Kings River and Central Valley Project, recycled water, and banked water.[11] The 2020 Urban Water Management Plan (UWMP) Update projects the City's water supply can keep pace with the growing demand for water use with the projected growth in population, as shown in Table 4.8-1. The City of Clovis's Water Supply Assessment, prepared as part of its 2020 UWMP confirms that the City has sufficient water resources to meet projected demands

[10] City of Clovis. 2025. Water. Available: https://www.clovisca.gov/services/public_utilities/water/index.php. Accessed May 2025
[11] City of Clovis. 2021. Urban Water Management Plan 2020 Update. Available: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf. Accessed May 2025

through 2040 and beyond. The city relies on a diversified water portfolio that includes groundwater from the Kings Subbasin, surface water from the Kings River via the Enterprise Canal, recycled water, and banked water. The Clovis Surface Water Treatment Plant currently provides up to 22.5 million gallons per day (MGD) of potable water, with infrastructure in place to expand capacity to 45 MGD as needed.[12]

Table 4.8-1 2020 UWMP City Growth Projections

Growth Characteristic	2020 Existing Population Estimate	2040 Population Forecast	Difference
Citywide Population	122,350	178,109	45.6%

According to the 2020 UWMP, the City of Clovis had a service area population of approximately 122,350 in 2020. Over the 20-year planning horizon, the population by 2040 is projected to increase to 178,109, representing a growth of approximately 45.6 percent.[13] The additional 1,303 units proposed in the project's Infill Rezone Program would increase the City's population by approximately 3,662 new residents. The maximum potential unit increase is 1,651, leading to a maximum potential population increase of 4,640 residents. In this maximum scenario the population could increase from 129,121 current residents to 133,761 residents, which remains at 45 percent of the City's total buildout capacity of 294,300.[14] The potential additional 4,640 residents that could result from future housing development in the Infill Rezone Program would only make up 1.6 percent of the overall buildout capacity. Therefore, the population increase associated with the project would remain well within the 2040 forecast established in the UWMP, which demonstrates that the City has sufficient water supplies to support this growth. As such, the project would result in a less than significant impact on water resources.

It is important to note that the City of Clovis maintains a diversified water supply portfolio, including surface water, recycled water, and groundwater recharge, and has committed to sustainable groundwater management under SGMA. Additionally, the City of Clovis is located within the jurisdiction of the CVRWQCB, which administers the Water Quality Control Plan for the Tulare Lake Basin (Basin Plan). This plan identifies beneficial uses of water resources and establishes water quality objectives to protect those uses. The Clovis stormwater infrastructure effectively manages stormwater and urban runoff while promoting groundwater recharge. Stormwater flows into storm drain inlets and is directed through a network of pipes to nearby ponding basins. These basins protect neighborhoods from flooding and allow water to infiltrate the ground, replenishing the groundwater aquifer, which is a primary source of drinking water for the community.[15] This system not only mitigates flooding but also supports sustainable water management by enhancing groundwater recharge. The proposed project would be required to comply with all applicable state and local water quality standards. Therefore, with adherence to these regulatory frameworks, the project is not anticipated to adversely affect water quality or conflict with the objectives of the Basin Plan.

[12] Clovis, City of. 2022. Water Supply Assessment. Available: https://files.ceqanet.lci.ca.gov/284041-1/attachment/gDuLMfphVf0CVi4YLFaTxWXwlFzitTVx4MCkw3XPL1aBFVntkQPWFjBmrJLt9ZOPUYPcyNKKb8oFGlE50. Accessed October 2025.
[13] Ibid.
[14] Clovis, City of. 2014. General Plan and Development Code Update Draft PEIR. Available: https://cms2.revize.com/revize/clovis/documents/Services/Planning%20Development/Planning/General%20Plan/Environmental%20Impact%20Report/VolumeIII_FinalEIR.pdf?t=202507181313090&t=202507181313090. Accessed May 2025.
[15] Fresno Metropolitan Flood Control District. 2025. Development in Fresno/Clovis. Available: https://www.fresnofloodcontrol.org/development-in-fresno-clovis/. Accessed June 2025.

Implementation of existing local regulations and policies would ensure that development facilitated by the proposed project would not interfere substantially with groundwater recharge or conflict with implementation of water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	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?
Threshold 4:	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 or amount of surface runoff in a manner which would result in flooding on- or off-site?
Threshold 5:	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 that 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?
Threshold 6:	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?

Impact HYD-3 DEVELOPMENT UNDER THE PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF FUTURE DEVELOPMENT SITES, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN A MANNER WHICH WOULD RESULT IN FLOODING OR EXCEED THE CAPACITY OF STORMWATER DRAINAGE SYSTEMS. IMPACTS RELATED TO DRAINAGE PATTERNS WOULD BE LESS THAN SIGNIFICANT.

Construction

Construction activities would involve grading, excavation, dredging, paving, and other earth-disturbing activities that could temporarily alter existing drainage patterns. As described above, compliance with SWRCB's NPDES Construction General Permit. Local alteration of drainage at individual Infill Rezone Program sites from development facilitated by the proposed project may occur, but such drainage alteration would be considered prior to grading or permit approval, would be required to connect to the existing storm drainage system, and no alteration of the course of streams or creeks would occur. Therefore, impacts would be less than significant.

Operation

Development facilitated by the project may alter the existing drainage patterns within proposed Infill Rezone Program sites through introduction of new impervious surfaces and infrastructure, such as driveways, roofs, and patios, as well as new downspout outflows from residential rain gutters and new runoff from landscaping irrigation. These alterations could increase the rate and/or amount of surface runoff, redirect runoff to different discharge locations, or concentrate runoff from sheet flow to channelized flow. Runoff that does not infiltrate and flows off site would be captured in the local storm drain systems into recharge basins.

Threshold 1 discusses applicable regulations that would limit pollutant discharges, including sediment and silt, from the proposed project. As discussed above, multiple layers of regulations require development facilitated by the project to reduce and eliminate stormwater pollutants, as well as implementation of BMPs to control pre-construction operational stormwater runoff. In particular, Clovis General Plan and CMC policies requiring adherence to the NPDES Permit as a condition of grading and use permit approval will work to enforce compliance with all relevant standards and regulations.

The Clovis General Plan goals and policies are intended to reduce flood hazards and overwhelming of the drainage system, such as Environmental Safety Element Policies 1.1 and 1.5 and Public Facilities and Services Element Policies 1.6 and 1.4, which would mandate all new development be consistent with the current stormwater master plan and allows the City to require developments to install stormwater facilities beyond their fair share, with a reimbursement mechanism for excess costs. In coordination with FMFCD, which is responsible for regional stormwater and flood control infrastructure, the City ensures that stormwater management systems are adequately planned and maintained. Implementation of these goals and policies, along with FMFCD's oversight, would ensure that the runoff from development facilitated by the project does not exceed the capacity of existing and future storm drain systems. Thus, impacts would be less than significant.

The proposed project would not alter the existing drainage patterns or contribute runoff water in a manner which would result in substantial erosion, siltation, or flooding, nor would it exceed the capacity of existing or planned stormwater drainage systems or result in substantial additional polluted runoff. Thus, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 7:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-4 DEVELOPMENT INCLUDED UNDER THE PROPOSED PROJECT WOULD NOT PLACE HOUSING AND OTHER STRUCTURES WITHIN FEMA-DESIGNATED FLOOD HAZARD AREAS AND TSUNAMI ZONES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Clovis is separated from the Pacific Ocean by a coastal mountain range that would not be impacted by a tsunami and does not contain large surface water bodies that would result in seiches. There are FEMA-designated 100-year Flood Hazard Areas throughout city limits, however, according to the Clovis General Plan Environmental Safety Element, Policy 1.1 (Flood Zone) prohibits development within the 100-year flood zone and dam inundation areas unless adequate mitigation is provided

against flood hazards.[16] The City of Clovis and surrounding area are not within a Tsunami Hazard Area. Therefore, there are no proposed Infill Rezone Program sites within a flood hazard, tsunami, or seiche zone. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.8.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if 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" (*CEQA Guidelines* Section 15065(a)(3)). The geographic scope for cumulative hydrology and water quality impacts is the extent of the watersheds located in Clovis, as described above in Section 4.8.1, *Setting*. This geographic scope is appropriate for hydrology and water quality because water quality impacts are localized in the watershed where the impact occurs.

As discussed throughout this analysis, development facilitated by the proposed project would increase the demand for water, which is supplied through imported and ground water. Any project associated with new residential development would be subject to project-specific environmental review and mitigation pursuant to CEQA. It is anticipated that the City's review processes would adequately mitigate potential environmental impacts related to the construction and occupancy of new housing units. Cumulative development would not result in a significant cumulative impact with the implementation of each development project. The project's impacts to groundwater supplies and groundwater management efforts would be less than significant as it is within the planned population growth of Clovis and therefore within its planned water usage. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to groundwater as it would comply with applicable water conservation measures, groundwater management plans, and regional sustainability goals and is within the planned projected water usage for the city.

Cumulative development would generally increase impermeable surface area and increase runoff into the Kings subbasin watershed. Development would potentially increase peak flood flows, alter drainage patterns, and increase pollutants in stormwater. However, cumulative development would also be required to adhere to all applicable State and local regulations designed to control erosion and protect water quality, including the CMC, NPDES Construction General Permit and MS4 General Permit, FMFCD and Basin Plan policies. All construction sites larger than one acre in size would be required to prepare and submit a SWPPP, thereby reducing the risk of water degradation on and off site from soil erosion and other pollutants, and smaller developments would still be required to adhere to any permit requirements imposed by the applicable policies and ordinances discussed under Impacts HYD-1 through HYD-4, above.

As discussed above under Impacts HYD-1 through HYD-4, development facilitated by the proposed project would increase impervious surface areas. However, compliance with relevant water quality regulations, BMPs, and policies would reduce the risk of water degradation from soil erosion and other pollutants related to construction and operational activities. Construction and operation of development facilitated by the project would not violate any water quality standards or Waste

[16] City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php. Accessed May 2025.

Discharge Requirements or otherwise substantially degrade water quality. The project's water quality and groundwater recharge impacts would be less than significant. Development facilitated by the proposed project would comply with NPDES, MS4, and City requirements related to stormwater runoff and water quality and consequently would not contribute to cumulative impacts to peak runoff, flooding, groundwater recharge, or water quality. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative impact related to water quality.

As discussed under Impact HYD-4, Clovis is located within the 100-year flood hazard area. However, the city prohibits development within the 100-year flood zone and dam inundation areas unless adequate mitigation is provided against flood hazards. Clovis is not within a zone at risk of inundation by flood or seiche and therefore are not at risk of release of pollutants due to inundation. Projects would be analyzed and mitigated on a case-by-case basis and would be designed to avoid or mitigate potential impacts related to flooding. Cumulative impact related to flooding or seiche would therefore be less than significant. As discussed under Impact HYD-4, development facilitated by the proposed project would not impede or redirect flood flows or risk release of pollutants due to inundation. Projects would be required to adhere to all applicable building and fire codes, zoning requirements, and design standards related to flood flows and project inundation. Impacts would be less than significant. The proposed project would not have a cumulatively considerable contribution to a significant cumulative impact related to flood hazard or inundation risks in the greater watershed or groundwater basin. Therefore, cumulative impacts to hydrology and water quality would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.9 Land Use and Planning

This section of the Environmental Assessment (EA) analyzes the consistency of the proposed rezoning of 20 infill parcels and land use designation amendments with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects and identifies environmental effects that would arise from such inconsistencies.

4.9.1 Setting

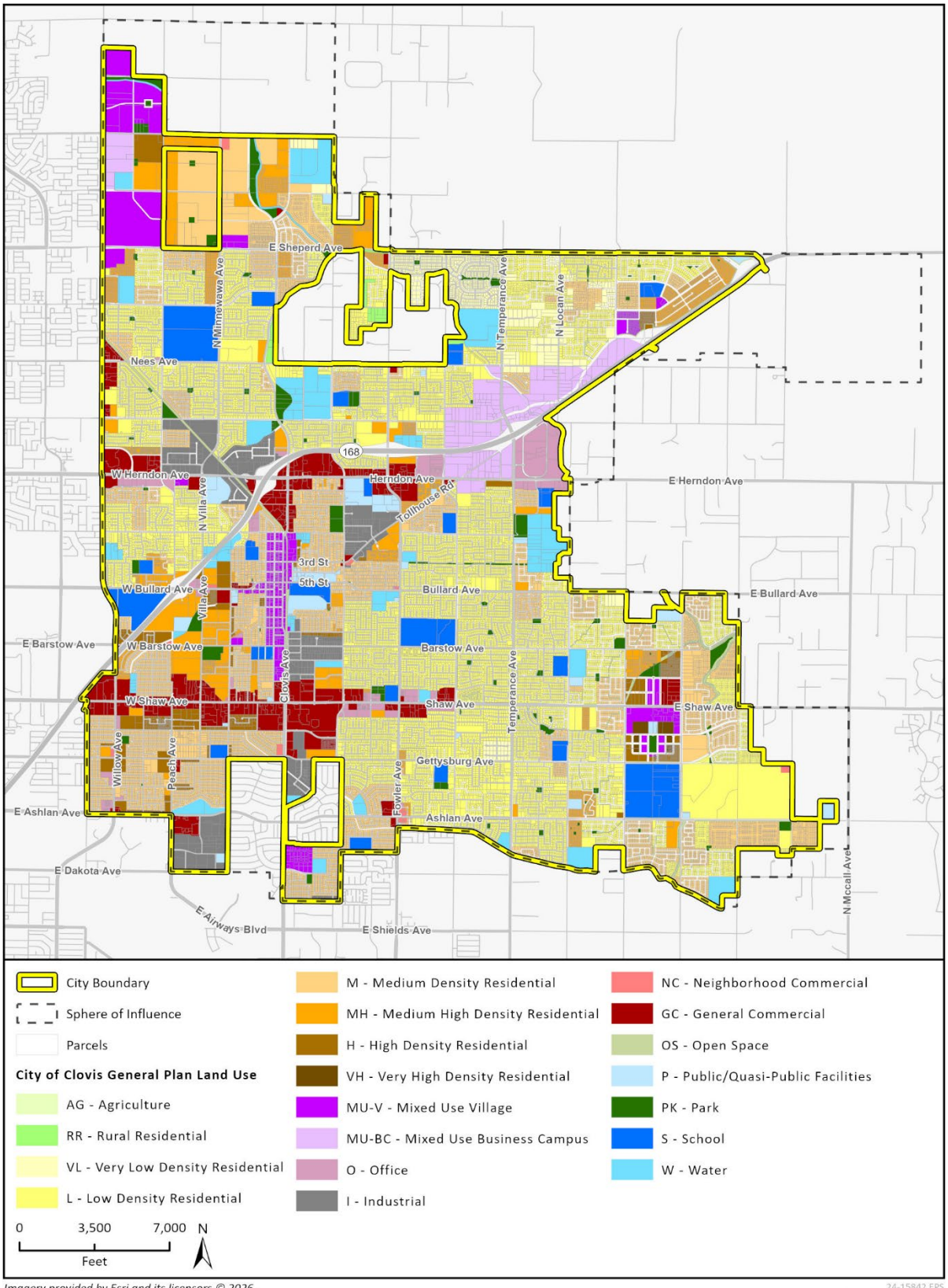
a. Existing Land Uses

The project is composed of urban and rural residential and agricultural uses, with a majority of the project falling in low density residential, medium density residential, and rural residential land use designations. The City of Clovis encompasses approximately 18,066 acres (28 square miles), and is comprised of a number of land uses, with agricultural, rural residential, and single-family residential making up the majority as shown in Figure 4.9-1. Figure 4.9-2 shows the existing Zoning in the city. Commercial and industrial uses are found primarily along the City's major corridors (e.g., Shaw, Clovis, and Herndon Avenues). Table 4.9-1 lists the proposed Infill Rezone Program sites' existing land use and zoning designations.

Table 4.9-1 Existing Land Use Designations and Zoning

Site ID*	APN	Address	Existing General Plan Land Use Designation	Existing Zone District
3	49102042	270 W Herndon Ave	GC	P-C-C
63	56303207	1933 Alluvial Ave	L	R-1-7500
72	56008207	437 W Nees Ave	L	R-1-7500
108	49123124	125 & 135 N Clovis Ave	GC	C-2
110	49906074	236 & 256 W Santa Ana Ave	M	R-1
115	55457044S	1671 Leonard Ave	M	R-1
157	55803359S	De Wolf & Richmond Ave	MU-V	P-C-C
161	43043316	2930 Willow Ave	O	C-P
167	55128004	1871 Shaw Ave	O	C-P
168	55128003	1853 Shaw Ave	O	C-P
197	55849230	1497 N Locan Ave	VL	R-1-AH
217	49954013ST	885 Gettysburg Ave	I	M-1
589	55026023	2403 Bullard Ave	L	R-A
590	55458036S	3959 Shaw Ave	M	R-1
592	56303131	1160 N Fowler Ave	L	R-A
595	49817202	939 & 947 Sunnyside Ave	L	R-1
596	49817201	965 & 975 Sunnyside Ave	L	R-1
597	49817203	925 Sunnyside	L	R-1
598	49938442	2560 Fowler Ave	L	R-1
599	49938441	2612 Fowler Ave	L	R-1

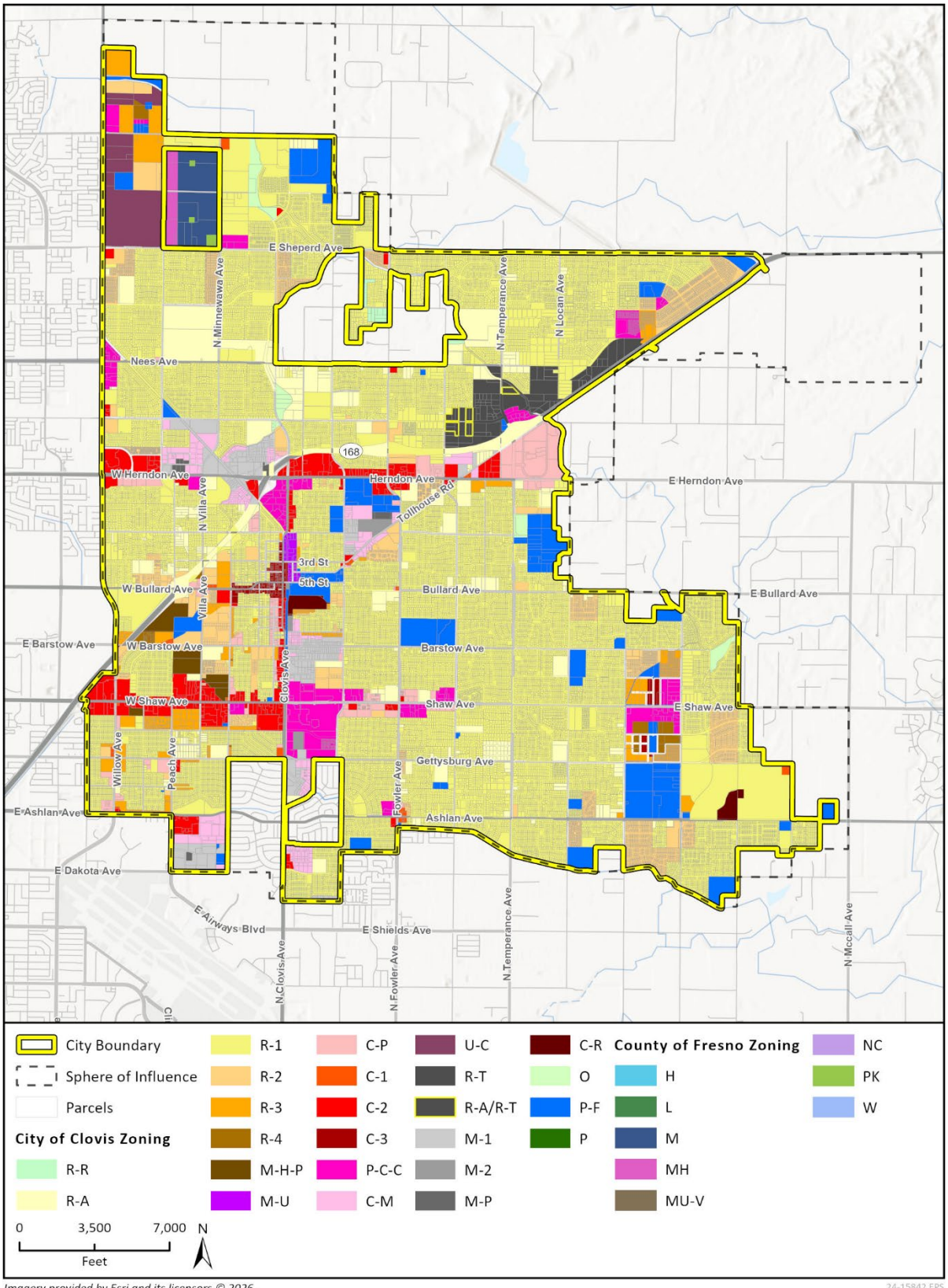
Figure 4.9-1 Existing Land Uses in Clovis



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Additional data provided by City of Clovis, 2025; Fresno County, 2025.

24-15842 EPS
Fig X Current GPLU Map

Figure 4.9-2 Existing Zoning in Clovis



Imagery provided by Esri and its licensors © 2026.
Additional data provided by the City of Clovis, 2025; Fresno County, 2025.

24-15842 EPS
Fig X Current Zoning Map

4.9.2 Regulatory Setting

State, regional and local laws, regulations, plans, or guidelines that are potentially applicable to the project are summarized below. There are no federal regulations that are applicable to this section.

a. State Regulations

California Housing Element Law

California Housing Element law (Government Code Sections 65580 to 65589.8) includes provisions related to the requirements for housing elements of local government General Plans. Among these requirements are an assessment of housing needs and an inventory of resources and constraints relevant to meeting these needs. Additionally, to assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, this section of the Government Code calls for local jurisdictions to plan for, and facilitate the construction of, their fair share of the region's projected housing needs, known as the Regional Housing Needs Allocation (RHNA). The City of Clovis adopted its 6th cycle 2023-2031 Housing Element on December 17, 2024.

To accommodate the 4th cycle Housing Element RHNA goal for lower income households as stated in Chapter 2*, Project Description*, the rezoning of 20 infill properties is necessary to provide sufficient housing development on sites that are adequate for accommodating lower income households.

General Plan Law (California Government Code Section 65300)

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires that each city and county adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its project area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, and safety elements, plus air quality for Valley cities, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated and consistent with the land use element.

Zoning authority originates from city and county police power and from the State's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan.

California Complete Streets Act (Assembly Bill 1358)

On September 30, 2008, Assembly Bill (AB) 1358, the California Complete Streets Act, was signed into law and became effective January 1, 2011. AB 1358 places the planning, designing, and building of complete streets into the larger planning framework of the general plan by requiring jurisdictions to amend their circulation elements to plan for multimodal transportation networks.

Sustainable Communities and Climate Protection Act (Senate Bill 375)

The Sustainable Communities and Climate Protection Act (Senate Bill (SB) 375) supports the State's climate goals by helping reduce greenhouse gas emissions through coordinated transportation, housing, and land use planning. Under the Act, the California Air Resources Board (CARB) set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010 and updated them in 2018. Each of the regions must prepare a Sustainable Community Strategy (SCS), as an integral part of its regional transportation plan, which contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet CARB's air quality targets. The Act establishes some incentives to encourage implementation of the development patterns and strategies included in a SCS. Developers can get relief from certain environmental review requirements under the California Environmental Quality Act (CEQA) if their new residential and mixed-use projects are consistent with a region's SCS that meets the targets[1].

b. Regional and Local Regulations

Fresno Council of Governments

The Fresno Council of Governments (COG) represents the cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma, and the County of Fresno. Fresno COG is the federally recognized metropolitan planning organization (MPO) for this region. Fresno COG fosters intergovernmental communication and coordination, undertakes comprehensive regional planning with an emphasis on transportation, provides for citizen involvement in the planning process, and supplies technical services to its member governments. Fresno COG's primary functions are transportation planning and programming.

As the region's MPO, Fresno COG cooperates with other COGs in the valley, San Joaquin Valley Air Pollution Control District, California Department of Transportation (Caltrans), and other agencies in preparing regional planning documents. Fresno COG has developed regional plans to achieve specific regional objectives. The plan most applicable to the project is discussed below.

Regional Transportation Plan/Sustainable Communities Strategy

Fresno COG has adopted a Regional Transportation Plan (RTP) to help coordinate development of the region's transportation improvements over the next 20 years. On July 28, 2022, Fresno COG adopted the 2011 Regional Transportation Plan: Long-Range Transportation Vision for the Fresno County Region for 2022 to 2046. The RTP guides how and where people and goods will travel by identifying both existing and needed transportation facilities, and sets policies for a wide variety of transportation options and projects based on available and projected funding.

The RTP and SCS will continue addressing the region's mobility needs through a long range vision towards 2046. The document is organized into chapters and addresses public participation,

[1] California Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28

environmental justice, sustainable communities strategy, and an action plan. New requirements for reducing greenhouse gas emissions from transportation sources under SB 375 are integrated into the development of the latest RTP/SCS.

San Joaquin Valley Blueprint

Rising to meet the San Joaquin Valley's most pressing issues, the eight MPOs (including Fresno COG) representing the eight counties in the San Joaquin Valley initiated the San Joaquin Valley Regional Blueprint (Valley Blueprint) planning process in 2006 to develop and help implement a vision for growth in the valley to the year 2050. The Valley Blueprint is a vision for the future of the San Joaquin Valley, in which less land is consumed for development, more resources are preserved for future generations, distinctive communities are enhanced, and more travel choices are available. On April 1, 2009, the San Joaquin Valley Regional Policy Council, the decision-making body for the valley wide process, approved Scenario B+ and the 12 Smart Growth Principles and Preferred Growth Scenario, concluding the third year of the Valley Blueprint planning process and setting the stage for the transition to the implementation phase of the Valley Blueprint, which began soon after in 2009.

Scenario B+ was adopted as the Preferred Blueprint Growth Scenario for the San Joaquin Valley to the year 2050. This preferred scenario serves as guidance for the valley's local jurisdictions with land use authority as they update their general plans. The 12 Smart Growth Principles represent the core values of the valley and are being used as the basis of future Blueprint planning and implementation. While each COG developed its own goals, objectives, and guiding principles, the 12 Smart Growth Principles were intended to reflect a regional perspective. The 12 Smart Growth Principles establish a benchmark for Blueprint-related decision making and provide guidance for achieving the Valley Blueprint.

Fresno Yosemite International Airport Land Use Compatibility Plan

In 1997, the Airport Land Use Commission (ALUC) of Fresno County adopted the Fresno Yosemite International Airport and Environs Plan. Subsequently, in June 2012, ALUC amended the existing plan and renamed it the Airport Land Use Compatibility Plan (ALUCP). The Clovis City Council adopted the ALUCP on December 12, 2018, and it went into effect on December 12, 2018. The ALUCP is a land use compatibility plan that is intended to protect the public from adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures or activities adversely affect navigable space. The ALUCP identifies standards for development in the airport's project area based on noise contours, safety zones, and building heights. ALUC is authorized under state law to assist local agencies in ensuring compatible land uses in the vicinity of airports. Primary areas of concern for ALUC are noise, safety hazards, and airport operational integrity.

The Fresno Yosemite International Airport is just outside the city's southwestern boundary. A small portion of the southwestern boundary is within the Airport Influence Area (AIA) of the Fresno Yosemite International Airport. Portions of the southwestern boundary also fall within Zone 6 of the safety compatibility and noise contour zones of this airport.

City of Clovis General Plan

The current General Plan was last comprehensively updated in 2014. The General Plan functions as a guide for future development and city land use decisions. The General Plan is a "constitution" for local decision making that addresses the range of immediate, mid- and long-term issues with which the community is concerned, including but not limited to environmental sensitivity and

preservation, public services, public safety, local transportation needs, sustainability, housing, and economic vitality. The 2014 General Plan is intended to allow land use and policy determinations to be made within a comprehensive framework that incorporates public health, safety, and quality of life considerations in a manner that recognizes that resource limitations and the fragility of the community's natural environment. Policies from the Land Use Element, Circulation Element, Open Space and Conservation Element, and Housing Element would be most applicable to the project.

The action items presented in the Infill Rezone Program, as discussed further in Chapter 2, *Project Description,* require the rezoning and land use designation amendment of 20 Infill Rezone Program sites. The following are policies from the relevant General Plan Elements that would be applicable to the project.

Land Use Element

- **Policy 3.6 Mix of Housing Types and Sizes.** Development is encouraged to provide a mix of housing types, unit sizes, and densities at the block level. To accomplish this, individual projects five acres or larger may be developed at densities equivalent to one designation higher or lower than the assigned designation, provided that the density across an individual project remains consistent with the General Plan.
- **Policy 3.8 Land Use Compatibility.** Within Urban Centers, new development that is immediately adjacent to properties designated for rural residential and agricultural uses shall bear the major responsibility of achieving land use compatibility and buffering.
- **Policy 5.1 Housing Variety in Developments.** The Clovis General Plan has been planned to provide a variety of housing product types suitable to each stage of a person's life. Each development should contribute to the sizes and types within the standards appropriate to the land use designation. This policy does not apply to projects smaller than five acres.

Circulation Element

- **Policy 1.4 Jobs and Housing.** Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles traveled and effectively utilize the existing transportation infrastructure.
- **Policy 3.2 Neighborhood Compatibility.** Periodically review and update design standards to ensure that new and redesigned streets are compatible with the context of adjacent neighborhoods.

Open Space and Conservation Element

- **Policy 1.1 Parkland Standard.** Provide a minimum of 4 acres of public parkland for every 1,000 residents.

Housing Element

- **Policy H-1.1 Housing Production Target.** Maintain an adequate supply of appropriately zoned land to support the production of at least 8,977 housing units in Clovis between 2023 and 2031 to accommodate the local and regional housing needs.
- **Policy H-1.2 Remove Barriers to Housing Production.** Work to ensure that local policies and standards do not unreasonably constrain the production of affordable housing units.

- **Policy H-2.6 No Net Loss of Housing Stock.** Ensure that sites being redeveloped for housing do not result in a net reduction in housing units, consistent with Government Code Section 66300(d).

City of Clovis Municipal Code

The City of Clovis Municipal Code establishes regulations that implement the City's General Plan. Title 9, Development Code, regulates the distribution and intensity of land uses in such categories as residential, commercial, and industrial. Regulations establish minimum lot size; building height and setback limits; fence heights; parking; and other development parameters within each land use.

City of Clovis Specific Plans and Master Plans

The City of Clovis contains several specific plans and master plans aimed at providing specific design and policy guidelines for communities throughout the city. Implications for the proposed rezones are analyzed by the goals and policies of the following adopted master and specific plans:

- Harlan Ranch Master Plan
- Heritage Grove Master Plan and Design Guidelines
- Home Place Master Plan
- Loma Vista Community Center Master Plan
- Parks Master Plan
- Heritage Grove City Center Village Master Plan
- Dry Creek Preserve Master Plan
- Central Clovis Specific Plan
- Herndon-Sheperd Specific Plan
- Loma Vista Specific Plan
- Shaw Avenue Specific Plan
- Urban Greening Master Plan

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The analysis in this section focuses on the compatibility of land uses identified in the project with existing and planned land uses within Clovis, as well as consistency with any applicable land use plans, policies, or regulations.

Significance Thresholds

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, an impact related to land use and planning would be significant if the proposed project would:

1. Physically divide an established community
2. 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

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project physically divide an established community?

Impact LU-1 THE PROJECT INVOLVES IMPLEMENTING A REZONING PROGRAM ON 20 SITES, MAINLY IN DEVELOPED AREAS OF THE CITY, AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The project would involve the Infill Rezone Program that would allow for approximately 1,303 housing units in accordance with the Judgment, and up to a maximum of 1,651 housing units. The project would not involve any actual physical development. The project aims to rezone and redesignate parcels that are within infill areas and are mostly surrounded by existing developed parcels. The rezoning and land use changes of these sites would not result in the construction of barriers, such as new roads, that would divide the existing communities surrounding the Infill Rezone Program sites, as there is existing roads and infrastructure serving these areas.

The project is designed to support the city in meeting its low-income RHNA target and would promote higher density development in vacant, underdeveloped, or underutilized properties, thereby locating people closer to existing employment, goods and services within an established community. Of the Infill Rezone Program sites, nine sites are currently vacant, nine are used for residential, and two are used for commercial. Increased density throughout the city, as indicated in the City General Plan, would help create more unified, cohesive neighborhoods as future development occurs.

While the project would not introduce development directly, the rezoning and land use changes of 20 sites would result in future higher density development that could require some utilities and infrastructure improvements. This would potentially result in a temporary limit on access to isolated areas during construction; however, the project would not exceed the City's population and housing projections as discussed in Section 4.11, *Population and Housing*, and would not require an unplanned demand for infrastructure and utility improvements that may divide an established neighborhood. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	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?

Impact LU-2 THE PROJECT WOULD NOT RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY LAND USE PLAN AND POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As set forth by State law, the General Plan serves as the primary planning document for the City and all subordinate documents and plans are required to be consistent with the General Plan. The project would amend the City of Clovis General Plan Land Use Element by allowing for higher density housing on 20 Infill Rezone Program sites throughout the city to facilitate affordable housing development. This change in density, upon approval, will be consistent with City land use plans and would not be in conflict with land use policies or regulations that mitigate environmental effects.

The project would facilitate higher density development; however, it would not exceed the buildout projections described in the General Plan, as discussed in Section 4.11, *Population and Housing*. The project plans to rezone and redesignate 20 sites, which would introduce up to 1,651 new housing units and 4,640 new residents, for a total of 133,761 Clovis residents after the project. This increase in population would require additional resources and potential land use changes in the future; however, Land Use Policy 1.2 states that the City shall be open to potential changes in land use, circulation, and development standards to reposition areas identified in the Land Use Map if necessary for revitalization and redevelopment, which aligns with the project's housing goals and growth projections.

While the project would not introduce development, future development allowed by the project would be reviewed for consistency with the City's development standards set forth in the City of Clovis Municipal Code as part of the design review process. The project would not remove or modify any policies or measures from the General Plan that are intended for environmental protection and would not conflict with any General Plan policies or measures that are intended for environmental protection.

Therefore, the project would not cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, and potential impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.9.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if 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"[2]. The geographic scope for cumulative land use and planning impacts includes the geographic area of the City of Clovis. Development that is considered part of the cumulative analysis includes buildout of the City's General Plan.

Cumulative land use and planning impacts, such as the potential for conflicts with adjacent land uses and consistency with adopted plans and regulations, are typically site- and project-specific. Subsequent projects allowed by the project may result in site-specific land use conflicts. However, because the exact size and nature of future developments and associated infrastructure improvements are not known at this time, it would be speculative to predict when impacts may occur. The project would not include any features that would physically divide an established community, and as such, would not contribute to cumulative impacts.

The project would remain consistent with the General Plan land use goals, as well as the Housing Element's planned growth and RHNA target. Additionally, these projects would generally reduce motor vehicle trips, trip lengths, and associated environmental impacts by increasing housing development for a larger population near transit, jobs, services, and open spaces. Because the project's impacts related to land use compatibility and consistency with local plans would be less than significant, the project's contribution to cumulative land use impacts would be less than significant.

[2] CEQA Guidelines Section 15065[a][3]

Mitigation Measures

No mitigation measures are required.

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4.10 Noise

This section analyzes noise-related impacts associated with development facilitated by the project, including temporary and permanent increases in ambient noise levels, the generation of groundborne vibration or noise, and the exposure of workers or residents to excessive airport noise. Transportation data used in this section for both existing conditions and buildout of the proposed project were provided by Kittelson (Transportation Analysis) prepared for the proposed project in June 2025.

4.10.1 Setting

Noise Overview

Sound is a vibration that transmits through a medium (such as a gas, liquid, or solid) created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds.

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler, et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as the doubling of vehicle traffic volumes, results in a noise level increase of three dB, whereas dividing the energy in half results in a three dB decrease.[1]

Human perception of noise has no simple correlation with sound energy, i.e., the perception of sound is not linear in terms of dBA or in terms of sound energy. Two sources, each containing the same sound energy, do not "sound twice as loud" as one source. It is widely accepted that the average healthy human ear can detect changes (either increases or decreases) of three dBA, which is recognized as being barely perceptible to most people. Similarly, a change of five dBA is readily perceptible and a change of 10 dBA sounds twice (or half) as loud.[2]

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs, and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used in this analysis are the equivalent continuous noise level (L_{eq}) and the maximum noise level (L_{max}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time. Typically, L_{eq} is equivalent to a one-hour period, even when measured for shorter durations as the noise level of a 10- to 30-minute period would be the same as the hour if the noise source is relatively steady. L_{max} is the highest Root Mean Squared (RMS) sound pressure level within the sampling period.

[1] Crocker, Malcolm J. (Editor). 2007. Handbook of Noise and Vibration Control Book, ISBN: 978-0-471-39599-7, Wiley-VCH, October.
[2] Ibid.

Propagation

Sound from a small, localized source (approximating a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of six dBA for each doubling of the distance away from the source. Other sources of noise, such as a road or railroad, are not a single, stationary point source of sound but rather, emanate noise from a line ("line" source). The drop-off rate for a line source is three dBA for each doubling of distance away from the source.

The propagation of noise is also affected by the absorption characteristics of the ground: a hard site, such as a parking lot or smooth body of water, provides no absorption/attenuation and the changes in noise levels with distance result simply from the geometric spreading of the source (i.e., three or six dBA reduction per doubling of distance for a point source or line source, respectively). Conversely, a soft site, such as soft dirt, grass, or scattered bushes and trees, may provide additional absorption/attenuation, potentially reducing noise levels an additional 1.5 dBA per doubling of distance away from the source.[3]

Noise levels may also be reduced by intervening structures. The amount of reduction provided by the "shielding" of these features depends on the size of the structure/s, the location of the structure/s relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line of sight between a noise source and receiver will provide at least a five-dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011).

Vibration Overview

Vibration levels are usually expressed as a single-number measure of vibration magnitude in terms of velocity or acceleration, which describes the severity of the vibration without the frequency variable. The peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration signal, usually measured in inches per second. Since it is related to the stresses experienced by buildings, PPV is often used in monitoring and controlling construction vibration. Although PPV is appropriate for evaluating the potential of building damage, it is not suitable for evaluating human response. It takes some time for the human body to respond to vibrations. In a sense, the human body responds to an average vibration amplitude (Federal Transit Administration [FTA] 2018). Because vibration waves are oscillatory, the net average of a vibration signal is zero. Thus, the RMS amplitude is used to describe the "smoothed" vibration amplitude (FTA 2018). The RMS of a signal is the square root of the average of the squared amplitude of the signal, usually measured in inches per second. The average is typically calculated over a one-second period. The RMS amplitude is always less than the PPV and is always positive. Decibel notation is used to compress the range of numbers required to describe vibration. The abbreviation "VdB" is used in this analysis for "vibration decibels" to reduce the potential for confusion with sound decibels.

Sensitive Receptors

The project area consists of 20 Infill Rezone Program sites within the existing City of Clovis boundaries. Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The Clovis General Plan identifies "schools, hospitals, senior housing and

[3] California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. Accessed June 2025: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf

convalescent facilities, residential uses, places of worship, libraries, and passive outdoor recreation areas" as noise-sensitive land uses within the City.[4] The primary noise source in the City of Clovis is vehicular traffic along State Route (SR)-168, Herndon Avenue, Shaw Avenue, Clovis Avenue and other arterial roadways. Other noise sources include overhead aircraft related to the Fresno-Yosemite Airport, located south of the Clovis city limits.

4.10.2 Regulatory Setting

a. Federal Regulations

Federal noise standards established by the United States (U.S.) Department of Housing and Urban Development (HUD) are applicable to residential projects that receive HUD assistance. These standards are presented in 24 Code of Federal Regulations (CFR) Part 51. New construction proposed in high noise areas (exceeding 65 dBA day-night average sound level (L_{dn})) must incorporate noise attenuation features to maintain acceptable interior noise levels. A goal of 45 dBA L_{dn} is set forth for interior noise levels and attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction, any building will provide sufficient attenuation to achieve an interior level of 45 dBA L_{dn} or less if the exterior level is 65 dBA L_{dn} or less. Approvals in a "normally unacceptable noise zone" (exceeding 65 dBA, but not exceeding 75 dBA) require a minimum of five dBA of additional noise attenuation for buildings having noise sensitive uses (e.g., residences) if the day-night average is greater than 65 dBA, but does not exceed 70 dBA, or a minimum of 10 dBA of additional noise attenuation if the day-night average is greater than 70 dBA, but does not exceed 75 dBA.

There are additional federal regulations that influence the audible landscape, especially for projects where federal funding is involved. For example, the FHWA requires abatement of highway traffic noise for highway projects through rules in the CFR (23 CFR Part 772), the FTA, and Federal Railroad Administration (FRA). Each agency recommends thorough noise and vibration assessments through comprehensive guidelines for any highway, mass transit, or high-speed railroad projects that would pass by residential areas.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the Environmental Protection Agency. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is not addressed further in this analysis.

b. State Regulations

California Building Code

California Code of Regulations Title 24, Building Standards Administrative Code, Part 2, Chapter 12, and the California Building Code codify the State noise insulation standards. These noise standards apply to new construction in California to control interior noise levels as they are affected by

[4] Clovis, City of. 2014a. City of Clovis General Plan. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.phphttps://cityofclovis.com/wp-content/uploads/2018/10/Clovis-General-Plan-2014.pdf

exterior noise sources and interior noise sources from separate areas. The regulations specify that interior noise levels shall not exceed 45 dBA community noise equivalent level (CNEL)/L_{dn} in any habitable room, as well as specifying sound transmission class requirements for walls, floors, and ceilings around sleeping units.

California Green Building Code

California Green Building Standards Code 2022 (CALGreen) Section 5.507.4, Acoustical Control, regulates construction of non-residential uses within the 65 dBA CNEL/L_{dn} contour of an airport, freeway, expressway, railroad, industrial noise source, or other fixed source. According to Section 5.507.4.1-2 "buildings exposed to a noise level of 65 dBA L_{eq} (1-hr) during any hour of operation shall employ sound-resistant assemblies as determined by a prescriptive method or performance method."

Projects may demonstrate compliance through the prescriptive method if wall and roof-ceiling assemblies exposed to the noise source meet a composite sound transmission class rating of at least 50 or a composite outdoor/indoor transmission class rating of no less than 40, with exterior windows of a minimum sound transmission class of 40 or outdoor/indoor transmission class of 30. Projects may demonstrate compliance through the performance method if wall and roof-ceiling assemblies exposed to the noise source are constructed to provide an interior noise environment that does not exceed 50 dBA L_{eq} (1-hr) in occupied areas during hours of operations.

c. Local Regulations

City of Clovis General Plan

Table 4.10-1 presents the land use compatibility chart for community noise adopted by the State of California as part of its General Plan Guidelines and modified by the City of Clovis in its General Plan Update. This table provides urban planners with a tool to gauge the compatibility of new land uses relative to existing and future noise levels. This table identifies normally acceptable, conditionally acceptable, and clearly unacceptable noise levels for various land uses. A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements.

Table 4.10-1 Land Use Compatibility Matrix

	CNEL						
Land Uses	**<**	**55**	**60**	**65**	**70**	**75**	**80>**
Amphitheater, concert hall, auditorium, meeting hall	B	B	C	C	D	D	D
Mobile home	A	A	B	C	C	D	D
Hospital, library, school, faith/religious uses	A	A	B	C	C	D	D
Hotel, motel, transient lodging	A	A	B	B	C	C	D
Single family, multifamily, faith/religious uses	A	A	B	B	C	D	D
Parks	A	A	A	B	C	D	D
Office building, research & development, professional office, city office building, and hotel	A	A	A	B	B	C	D
Amusement park, miniature golf, go-cart track, health club, equestrian center	A	A	A	B	B	D	D
Golf courses, nature centers, cemeteries, wildlife reserves, wildlife habitat	A	A	A	A	B	C	C
Commercial retail, bank, restaurant, movie theater	A	A	A	A	B	B	C
Automobile service station, auto dealer, manufacturing, warehousing, wholesale, utilities	A	A	A	A	B	B	B
Agriculture	A	A	A	A	A	A	A

Zone A. Clearly Compatible. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Zone B. Normally Compatible. New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Zone C. Normally Incompatible. New construction or development should normally be discouraged. If new construction or development does proceed, a detailed analysis or noise reduction requirements must be made and needed noise insulation features must be included in the design.

Zone D. Clearly Incompatible. New construction or development should generally not be undertaken.

CNEL = community equivalent noise level

Source: Clovis General Plan, 2014

City of Clovis Municipal Code

Section 9.22.080 of the City of Clovis Municipal Code (CMC) specifies maximum exterior noise limits that are not to be exceeded for various land use types. These noise limits, which apply at the property line, are shown in Table 4.10-2.

Table 4.10-2 Maximum Exterior Noise Standards

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

1. If the ambient exceeds the resulting standard, the ambient shall be the standard.
2. It is unlawful for any person to create any noise, or to allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person, which causes the noise level when measured on any property measured at the property line, to exceed either of the following within the incorporated area of the City:
   a. The noise standard for the applicable zone for any fifteen (15) minute period;
   b. A maximum impulsive noise equal to the value of the noise standard plus twenty (20) dBA for any period of time (measured using A-weighted slow response). Impulsive noise which repeats four (4) or more times in any hour between 10:00 p.m. and 7:00 a.m. shall be measured as continuous sound and meet the noise standard for the applicable zone.

dBA = A-weighted decibels; L_{eq} = equivalent noise level

Source: City of Clovis Municipal Code, Section 9.22.080, Table 3-1 (City of Clovis 2024).

Section 5.27.604 of the CMC contains regulations on noise produced by construction activities, stating "construction activities are only permitted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times "be in strict compliance with the permit" (City of Clovis 2024).

Neither the Clovis General Plan nor the CMC provides a quantitative construction noise threshold. Therefore, the limits specified in the FTA *Transit Noise and Vibration Impact Assessment Manual* (2018) were used to evaluate the project's potential construction noise impacts. These construction noise limits are shown in Table 4.10-3.

Table 4.10-3 FTA Construction Noise Criteria

Land Use	dBA L_{eq} (8-hour)	
	Day (7:00 a.m. to 10:00 p.m.)	Night (10:00 p.m. to 7:00 a.m.)
Residential	80	70
Commercial	85	85
Industrial	90	90

dBA = A-weighted decibels; L_{eq} = equivalent noise level

Source: FTA 2018

Based on the criteria shown in Table 4.10-3, construction noise would be significant if it were to exceed 80 dBA L_{eq} for an eight-hour period for residential uses, applied at the project property line. Additionally, construction noise would be considered significant if it were to occur outside of the allowable days and hours specified in Section 5.27.604 of the CMC.

Section 9.22.100 of the CMC addresses vibration, stating "vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks) are exempt from the provisions of this section" (City of Clovis 2024). In absence of a quantitative vibration threshold, vibration limits used in this analysis to determine potential vibration impacts to surrounding

receptors during construction are based on thresholds for vibration damage potential established in the *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018). These vibration limits are shown in Table 4.10-4.

Table 4.10-4 FTA Vibration Damage Potential Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second

Source: FTA 2018

For a conservative analysis, construction vibration impacts would be significant if vibration levels exceed 0.2 in/sec PPV at the nearest offsite residential structures to the Infill Rezone Program site. This is the level at which minor architectural (i.e., non-structural) damage may occur to buildings of standard residential construction.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

As discussed in Chapter 2, *Project Description*, the proposed project is a plan to accommodate forecasted growth and existing and future need for housing. The following discussion describes the methodology used to evaluate the significance of potential noise and vibration impacts related to the rezoning of the 20 Infill Rezone Program sites.

Construction Noise

The primary source of temporary noise associated with the proposed project would be construction activities associated with accommodated housing development. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders.[5] Each phase of construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels than others and some may have high-impact intermittent noise levels.[6] Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, or equipment location. In typical construction projects, grading activities typically generate the highest noise levels because grading involves the largest equipment and covers the greatest area.

[5] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment. Accessible at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

[6] Ibid.

Foundation excavation and construction is often the second loudest phase, followed by paving and building construction.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle, or percent of operational time, of the activity to determine the L_{eq} of the operation.[7]

For assessment purposes, noise levels for common construction equipment provided in the FTA *Transit Noise and Vibration Impact Assessment* (2018) guidance document were used to analyze potential noise levels associated with future development under the Housing Element. The FTA provides typical noise levels at 50 feet from various types of equipment. Construction noise was also estimated using the FHWA's Roadway Construction Noise Model (RCNM) (2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. Using RCNM, construction noise levels were estimated at a distance of 50 feet from future development.

On-site Operational Noise

Stationary noise sources (i.e., on-site operational noise) for future development facilitated by the proposed project were analyzed in context of typical mechanical equipment on residential development such as heating, ventilation, and air conditioning (HVAC) units.

Off-site Operational Noise

The transportation analysis, on which the noise analysis is based, evaluates reasonably anticipated development that is expected to occur by 2035 as a result of the proposed project.[8] The reasonably anticipated development is based on the acreage of land designated for each type of land use, allowable densities and intensities for each land use designation, and reasonably expected levels of development through the life of the proposed project.

Groundborne Vibration

Development carried out under the proposed project would not include substantial vibration sources associated with operation. Construction activities have the greatest potential to generate groundborne vibration affecting nearby noise-sensitive receptors. Construction vibration levels that could occur due to development carried out under the proposed project are based on reference vibration levels published by the FTA.

Significance Thresholds

In accordance with Appendix G of the *California Environmental Quality Act* (*CEQA) Guidelines*, the proposed project's noise and vibration impacts would be significant if it would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Generate excessive groundborne vibration or groundborne noise levels; or

[7] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment. Accessible at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf
[8] Kittelson & Associates. 2025. Transportation Analysis. June 2025.

3. 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, expose people residing or working in the project area to excessive noise levels.

The following discussion identifies specific thresholds used to analyze the general CEQA thresholds listed above.

Construction Noise

Although the CMC has established hours of construction in Section 5.27.604, the City of Clovis has not adopted a quantitative threshold for evaluating construction noise impacts. Therefore, this analysis relies on the reasonable criteria provided by the FTA for assessing construction noise impacts based on the potential for adverse community reaction in its *Transit and Noise Vibration Impact Assessment Manual*. For residential uses, the daytime noise threshold is 80 dBA L_{eq} for an eight-hour period.

Operational Noise

The City has adopted noise standards in the CMC that regulate operational stationary noise sources in the City. Operational noise would result in a significant impact if it exceeds the ambient base noise levels established for residential/noise-sensitive uses as shown in Table 4.10-2.

Groundborne Vibration

The City's Municipal Code or General Plan does not have vibration thresholds. Therefore, this analysis applies the following vibration thresholds established by the FTA for potential structural damage to buildings. The FTA thresholds in Table 4.10-4 are used to assess the potential structural damage to buildings from construction vibration. A significant impact would be identified if construction facilitated by the project would generate excessive vibration levels at surrounding receptors. Groundborne vibration levels exceeding 0.12 in/sec PPV would have the potential to result in cosmetic damage to buildings extremely susceptible to vibration damage (i.e., historic buildings), and groundborne vibration levels exceeding 0.2 in/sec PPV would have the potential to result in cosmetic damage to non-engineered timber and masonry buildings (i.e., residential buildings).

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 **CONSTRUCTION OF INDIVIDUAL PROJECTS CARRIED OUT UNDER THE PROPOSED PROJECT WOULD TEMPORARILY INCREASE NOISE LEVELS, POTENTIALLY AFFECTING NEARBY NOISE-SENSITIVE LAND USES. DEVELOPMENT CARRIED OUT UNDER THE PROPOSED PROJECT WOULD ALSO INTRODUCE NEW NOISE SOURCES AND CONTRIBUTE TO INCREASES IN OPERATIONAL NOISE. IMPLEMENTATION OF MITIGATION MEASURE (MM) NOI-1 WOULD REDUCE CONSTRUCTION NOISE LEVELS; HOWEVER, CONSTRUCTION NOISE IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE EVEN WITH MITIGATION. OPERATIONAL NOISE WOULD NEED TO CONFORM TO EXISTING CITY REQUIREMENTS AND THEREFORE OPERATIONAL IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

Construction

Construction noise from individual development facilitated by the proposed project would temporarily increase ambient noise levels on and adjacent to individual construction sites, including noise from construction traffic. Since the project does not propose any specific development projects, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects. However, areas of Clovis adjacent to the proposed Infill Rezone Program sites, upzoning areas, and additional parcels would be exposed to the highest levels of construction noise for the longest duration, especially in areas where Infill Rezone Program sites, upzoning areas, and additional parcels are more concentrated. Construction noise associated with buildout facilitated by the proposed project would occur over the project's planning period (2035).

Construction activities that would generate noise include but are not limited to construction traffic and hauling, demolition, and construction itself. Table 4.10-5 illustrates typical noise levels associated with various common types of construction equipment at a distance of 50 feet, which is representative of the exposure of adjacent noise-sensitive receptors to construction noise. Noise from stationary sources of equipment typically drops off at a rate of about six dBA per doubling of distance; therefore, noise levels would be about six dBA lower than shown in the table at 100 feet from source construction site and 12 dBA lower at a distance of 200 feet from source construction site.

Table 4.10-5 Typical Noise Levels for Construction Equipment

	Estimated Noise Levels at Nearest Sensitive Receptors (dBA Leq)		
Equipment	**50 feet**	**100 feet**	**200 feet**
Air Compressor	81	75	69
Backhoe	80	74	68
Concrete Mixer	85	79	73
Dozer	85	79	73
Grader	85	79	73
Jackhammer	88	82	76
Paver	89	83	77
Pile-drive (Impact)	101	95	89
Pile-driver (Sonic)	95	89	83
Saw	76	70	64
Scraper	89	83	77
Truck	88	82	76

Source: FTA 2018

As shown in Table 4.10-5, the loudest piece of construction equipment is a pile-driver, which could cause noise levels to approach 101 dBA L_{eq} at a distance of 50 feet. Pile-drivers are used to install deep foundation piers and are not typically used for construction of residential development. However, project-level details are not currently available for future projects that would be facilitated by the proposed project, and it cannot be guaranteed that future construction would not involve use of a pile-driver. Therefore, this sound level is considered to provide a conservative analysis. Accordingly, construction noise associated with buildout facilitated by the project would likely exceed ambient noise levels and may temporarily disturb people at neighboring properties.

Section 5.27.604 of the CMC contains regulations on noise produced by construction activities, stating "construction activities are only permitted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times be in strict compliance with the permit" (City of Clovis 2024).

Compliance with Section 5.27.604 of the CMC would restrict the timing of construction activities authorized by a City permit to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 9:00 a.m. to 5 p.m. on Saturday and Sundays (City of Clovis 2024). In addition, implementation of and adherence to the following existing policies in the Environmental Safety Element of the General Plan would ensure continued application of the City's existing timing restrictions on construction activity, or modification of those standard restrictions as necessary to protect noise-sensitive receptors. While the project may involve revisions to the Environmental Safety Element, these existing policies would remain in effect:

Goal 3: An environment in which minimized noise contributes to the public's health, safety, and welfare.

Policy 3.3: New residential. When new residential development is proposed adjacent to land designated for industrial or commercial uses, require the proposed development to assess potential noise impacts and fund feasible noise-related mitigation measures.

Policy 3.4: Acoustical study. Require an acoustical study for proposed projects that have the potential to exceed acceptable noise thresholds or are exposed to existing or future noise levels in excess of the thresholds in the city's noise ordinance.

Implementation of Goal 3, Policy 3.3 and 3.4 would reduce construction noise impacts associated with future discretionary projects carried out under the proposed project. However, project-level details are not currently available for future projects that would be facilitated by the proposed project. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Construction noise levels associated with future projects may exceed the FTA's daytime construction noise limits, and impacts would be potentially significant and mitigation is required.

Implementation of MM NOI-1 below, as well as implementation of applicable goals and policies of the City's General Plan would reduce potential impacts from noise during construction by reducing noise source impacts and creating sound barriers where required/necessary. However, as exact details of future project-specific construction activities are unknown at this time, construction noise could still exceed the daytime significance threshold or potentially need to occur during the more sensitive nighttime hours. Consequently, although implementation of MM NOI-1 would reduce construction noise impacts, it cannot be guaranteed that construction noise impacts would be reduced to below the significance threshold of 80 dBA L_{eq} during the daytime at residential uses and other sensitive receptors in all cases. Therefore, the proposed project's construction noise impacts would remain significant and unavoidable.

Operation

Stationary Noise

Stationary and other sources of noise in the City of Clovis include those associated with the standard operation of land uses. These sources could include, but are not limited to, landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, HVAC units), garbage collection activities, and other stationary and area sources such as people's voices and amplified music. Noise generated by residential uses are generally short-term and intermittent in nature. The project would provide for an increase in residential development throughout the city. Residential development tends to have lower noise levels compared to other uses, such as industrial or commercial uses.

The City would have the discretion to condition the approval of a new project to meeting the noise standards in the development code. Mitigation measures include equipment design, equipment selection, equipment location, the design of equipment enclosures, construction of sound walls, and limiting the hours of operation. The Environmental Safety Element includes the following goals and policies that pertain to operational stationary noise:

Goal 3: An environment in which minimized noise contributes to the public's health, safety, and welfare.

Policy 3.1: Land use compatibility. Approve development and require mitigation measures to ensure existing and future land use compatibility as shown in the Noise Level Exposure and Land Use Compatibility Matrix and the city's noise ordinance.

Policy 3.3: New residential. When new residential development is proposed adjacent to land designated for industrial or commercial uses, require the proposed development to assess potential noise impacts and fund feasible noise-related mitigation measures.

Policy 3.4: Acoustical study. Require an acoustical study for proposed projects that have the potential to exceed acceptable noise thresholds or are exposed to existing or future noise levels in excess of the thresholds in the city's noise ordinance.

Policy 3.5: Site and building design. Minimize noise impacts by requiring appropriate site, circulation, equipment, and building design, and sound walls, landscaping, and other buffers.

Policy 3.6: Noise impacts. Minimize or eliminate persistent, periodic, or impulsive noise impacts of business operations.

Policy 3.7: Mixed-use buildings. Require that mixed-use structures be designed to prevent transfer of noise and vibration between uses.

Policy 3.8: Existing uses. Require the use of noise abatement devices for existing uses that exceed acceptable noise thresholds.

Policy 3.14: Control sound at the source. Prioritize using noise mitigation measures to control sound at the source before buffers, soundwalls, and other perimeter measures.

Implementation of CMC Chapter 5.27.6 and implementation of Goal 3 and Policies 3.1, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 and 3.14 would reduce potential impacts associated with new noise-producing land uses by identifying mitigation that would reduce noise associated with new stationary noise sources below acceptable noise standards. As a result, stationary operational noise would not exceed the City's standard for allowable noise exposure at residential sensitive receptors of 55 dBA $L_{eq(15\text{-}min)}$ during daytime hours and 50 dBA $L_{eq(15\text{-}min)}$ during nighttime hours. Therefore, on-site operational impacts from the project would be less than significant.

Traffic Noise

The transportation analysis, on which the traffic noise analysis is based, evaluates vehicle miles traveled associated with the project (see Section 4.13, *Transportation*). As shown in Table 4.10-6, vehicle miles traveled in Clovis would increase by approximately four percent with the project compared to the no project scenario. A four percent increase in traffic on a roadway would equate to an approximate increase of 0.2 dBA. Therefore, noise level increases of this size would not result in noise levels that are above the "normally unacceptable" category for land uses adjacent to these corridors, including residential, school, and commercial uses. Traffic noise impacts would be less than significant.

Table 4.10-6 Traffic Noise Increase

	Vehicle Miles Traveled
Clovis Sphere of Influence	2,153,575
Clovis Sphere of Influence with Project	2,235,892
Change in Vehicle Trips	+82,317
Percent Change in Vehicle Trips (%)	4%
Estimated Traffic Noise Increase from Increase in Vehicle Trips	0.2 dBA

Source: Kittelson & Associates. 2025. *Transportation Analysis.* June 2025.

Compliance with applicable goals and polices noted above, on-site operational impacts and traffic noise impacts would be less than significant without mitigation.

Mitigation Measures

NOI-1 Measures to Reduce Construction Noise

To minimize noise during construction, the City of Clovis shall require construction contractors to implement the following measures for construction activities conducted within the City for the 20 Infill Rezone Program sites. Construction plans submitted to the City shall include construction noise analysis and identify these measures on demolition, grading, and construction plans submitted to the City. The City of Clovis Building Division shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits.

- **Mufflers.** During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards.
- **Stationary Equipment.** All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.
- **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.
- **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations.
- **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities, where feasible.
- **Noise Disturbance Coordinator.** The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator and the City shall be posted at the construction site.

- **Temporary Noise Barriers.** Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) or when the anticipated construction duration is greater than is typical (e.g., two years or greater) and there are sensitive receptors within 500 feet of the construction site. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least one pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.

Significance after Mitigation

Significant and unavoidable for construction.

Less than significant for operation and traffic noise.

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF INDIVIDUAL DEVELOPMENT FACILITATED BY THE PROJECT COULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION, POTENTIALLY AFFECTING ADJACENT SENSITIVE LAND USES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

The construction of individual development facilitated by the proposed project could intermittently generate strong vibration on and adjacent to construction sites. Typical construction equipment that produces vibration include pile drivers, vibratory rollers for paving, caisson drills, bulldozers, loaded trucks, and jackhammers. Table 4.10-7 lists groundborne vibration levels from various types of construction equipment at various distances.

Table 4.10-7 Vibration Levels for Typical Construction Equipment

Equipment		Approximate Vibration Level (in/sec PPV)			
		25 feet from Source	50 feet from Source	100 feet from Source	200 feet from Source
Caisson Drilling		0.089	0.031	0.011	0.004
Jackhammer		0.035	0.012	0.004	0.002
Large Bulldozer		0.089	0.031	0.011	0.004
Loaded Truck		0.076	0.027	0.010	0.003
Pile Driver (impact)	Upper range	1.519	0.537	0.190	0.067
	Typical	0.644	0.228	0.081	0.028
Pile Driver (sonic)	Upper range	0.734	0.260	0.092	0.032
	Typical	0.170	0.060	0.021	0.008
Small Bulldozer		0.003	0.001	<0.001	<0.001
Vibratory Roller		0.21	0.074	0.026	0.009

Source: FTA 2018.

Based on Table 4.10-7, buildings and structures could experience the strongest vibration during the use of pile-drivers and vibratory rollers. Vibration levels from pile-drivers could approach 1.519 in/sec PPV at a distance of 25 feet from the source and 0.190 in/sec at 100 feet, and vibration levels from vibratory rollers could approach 0.21 in/sec PPV at a distance of 25 feet and 0.026 at 100 feet. Pile-drivers are used to install deep foundation piers and vibratory rollers are used to compact soil, gravel, or asphalt. Pile-drivers and vibratory rollers are not used for every construction project. However, project-level details are not currently available for future projects that would be facilitated by the proposed project, and it cannot be guaranteed that future development would not involve use of pile-drivers or vibratory rollers. Therefore, vibration levels from these pieces of equipment are considered to provide a conservative analysis.

In terms of impacting residents, compliance with CMC Section 5.27.604 would restrict the timing of construction activities to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday (except from June 1st to September 15th, the permitted hours for construction activity are 6:00 a.m. to 7:00 p.m. Monday through Friday) and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays. This requirement for new development would protect residents from exposure to vibration during normal sleeping hours. In terms of impacting structures, the threshold for historic structures is 0.12 in/sec PPV, and the threshold for non-historic buildings at 0.2 in/sec PPV.[9] As shown in Table 4.10-7, vibration levels associated with pile-drivers and vibratory rollers operating at a distance of 25 feet could exceed the threshold for non-historic structures and pile-drivers operating at a distance of up to 100 feet could exceed the threshold for historic and non-historic structures. Table 4.10-8 summarizes the distances at which construction equipment would exceed vibration thresholds.

Table 4.10-8 Distances at Which Vibration Levels for Typical Construction Equipment Exceed Vibration Thresholds

	Distance (feet) at Which Vibration Level (in/sec PPV) Exceeds Threshold[1]		
Equipment	Historic Structures (in feet)	Timber/Masonry Buildings[2] (in feet)	Engineered Concrete/ Masonry Buildings (in feet)
Pile-Driver	135	100	75
Vibratory Roller	40	25	25
Dozer/Large Earthmoving Equipment	20	15	15

[1] The threshold for historic structures is 0.12 in/sec PPV, and the threshold for non-historic buildings at 0.2 in/sec PPV (FTA 2018).

[2] Most residential buildings consist of non-engineered timber/masonry buildings.

in/sec PPV = inches per second peak particle velocity

Because most Infill Rezone Program sites, rezoning areas, and additional parcels are located near or adjacent to existing structures, it is possible that construction of development facilitated by the project could generate vibration that exceeds applicable thresholds. In addition, as discussed in Section 4.4, *Cultural Resources,* historic-age structures are located throughout the City. Accordingly, future construction facilitated by the project may exceed applicable groundborne vibration thresholds. Impacts would be potentially significant and mitigation is required.

Implementation of MM NOI-1 and MM NOI-2 would reduce potential impacts from groundborne vibration to less than significant levels by requiring proper buffer distances to vibration-sensitive receptors depending on the type of construction equipment or requiring alternative construction

[9] Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment. Accessible at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf

equipment to reduce vibration. Accordingly, construction vibration impacts would be less than significant with mitigation.

Operation

The project would primarily facilitate residential development, which does not typically generate vibration during operation. Commercial development facilitated by the project is not anticipated to involve industrial, high-intensity uses that could result in vibration during operation, such as mining operations or manufacturing uses. Therefore, project operational vibration impacts would be less than significant.

Mitigation Measures

Implement MM NOI-1 (as described above).

NOI-2 Measures to Reduce Construction Vibration

Prior to issuance of a building permit for a project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities.

- Pile driving during construction within 135 feet of fragile structures such as historical resources
- Pile driving during construction within 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings)
- Pile driving during construction within 75 feet of engineered concrete and masonry (no plaster)
- Use of a vibratory roller within 40 feet of fragile historical resources or 25 feet of any other structure
- Use of a dozer or other large earthmoving equipment within 20 feet for a fragile historical structure or 15 feet of any other structure

This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 in/sec peak particle velocity (PPV) for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If necessary, construction vibration monitoring shall be conducted to verify FTA vibration thresholds are not exceeded.

Significance after Mitigation

Less than significant with mitigation measures for construction.

Less than significant for operations.

Threshold 3:	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?

Impact NOI-3 DEVELOPMENT FACILITATED BY THE PROJECT WOULD BE LOCATED OUTSIDE OF NOISE CONTOURS ASSOCIATED WITH NEARBY AIRPORTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

There are no airports located within the City of Clovis city limits. The closest public or public use airport to the Infill Rezone Program sites is the Fresno-Yosemite International Airport. The airport is located approximately 0.4 miles south of the City and approximately 0.75 miles from the closest Infill Rezone Program site (site 161). The Fresno County Airport Land Use Compatibility Plan (ALUCP) Airport Influence Area and Safety Zone Exhibit D1 shows a southwest portion of the City of Clovis is located within the Traffic Pattern Zone. Infill Rezone Program sites 110, 161, 217, 598, and 599 are located within this Zone. This safety zone is related to airspace risk and does not influence maximum residential density. There are no Infill Rezone Program sites that are located within the future (year 2022) noise contours of the airport shown on Exhibit D2 of the Fresno County Airport Land Use Compatibility Plan. While new development facilitated by project would be exposed to aircraft noise, the City's location outside noise contours associated with the nearby airport indicates that noise exposure to sensitive land uses would be within acceptable levels from airport noise. Therefore, the project would not expose people residing or working in the housing sites, rezoning areas, or additional parcels to excessive aircraft noise. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.10.4 Cumulative Impacts

Construction Noise

Construction noise generated by projects carried out under the proposed project, in combination with construction activities for other cumulative projects that may be constructed simultaneously could, without mitigation, substantially increase noise levels in the vicinity of future projects. Goals, policies and mitigation measures have been identified to help reduce noise from construction equipment from future projects carried out under the proposed project. Therefore, unless construction of cumulative projects, including those carried out under the proposed project, occur in close proximity to each other and simultaneously, noise from individual construction projects has a small chance of combining to create significant cumulative impacts. Although this scenario is unlikely, and policies, actions, and mitigation measures would be implemented to the extent feasible, the potential remains for a cumulatively considerable increase in construction noise from projects carried out under the proposed project. The proposed project could result in a substantial contribution to this cumulatively significant impact. Therefore, the cumulative impact related to construction noise would be significant and unavoidable.

Operational Stationary Noise

Development carried out under the proposed project would introduce new stationary noise sources to the ambient noise environment in and around the project area, including new mechanical ventilation equipment. These sources may combine with noise from other nearby cumulative projects to result in higher noise levels. However, operational noise from these sources is localized

and rapidly attenuates within an urbanized setting due to the effects of intervening structures and topography that block the line of sight, and due to other noise sources closer to receptors that obscure project-related noise. Implementation of the CMC noise standards would ensure that noise from new stationary sources as part of cumulative development would be within acceptable levels. Therefore, the cumulative impact related to operational stationary noise would be less than significant.

Operational Mobile Noise

As discussed in Impact NOI-1, traffic noise increases from development facilitated by the proposed project would contribute to noise level increases that would not exceed impact criteria and therefore would not be cumulatively considerable. Therefore, in combination with traffic noise for other cumulative projects, the cumulative impact related to operational traffic noise would be less than significant.

Groundborne Vibration and Noise

Although there could be other cumulative projects simultaneously under construction near a development project carried out under the proposed project, the potential for construction groundborne vibration and noise impacts exists within a limited area (e.g., within approximately 25 feet for a vibratory roller). Since no two construction cumulative projects would both be within 25 feet of a given sensitive structure, cumulative groundborne vibration and noise impacts would be less than significant.

Airport Noise

Aircraft-related noise impacts occur only in the vicinity of airports or airstrips. Although citywide growth facilitated by the proposed Infill Rezone Program could increase the number of people who are exposed to aircraft-related noise impacts, such impacts would be localized in nature. In addition, new residential development and other development would not result in a direct increase to aircraft operations that would increase noise exposure to aircraft overflight patterns within and outside the City. Development facilitated by the proposed project would have no contribution to any cumulative impact related to airport hazards or noise. Impacts related to airport or airstrip noise would not be cumulatively considerable and cumulative impacts would be less than significant.

Mitigation Measures

Implement mitigation measures NOI-1 and NOI-2.

Significance after Mitigation

Less than significant for operations. Less than significant with mitigation measures for construction.

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4.11 Population and Housing

This section analyzes impacts related to population and housing growth associated with development facilitated by the Infill Rezone Program project.

4.11.1 Setting

a. City of Clovis Existing and Forecasted Population and Housing

The California Department of Finance (DOF) takes inventory on current housing stock, including single and multifamily housing units, and mobile home housing units, excluding accessory dwelling units. Table 4.11-1 provides the DOFs 2025 estimates of population and housing for Clovis and Fresno County as a whole. As of January 2025, Clovis has an estimated 2025 population of 129,121 and an estimated 47,817 housing units. [1] The DOF estimated the average household size in Clovis was 2.70 persons, whereas the County average was 2.95 persons per household.[2] The housing unit vacancy rate of the city (4.1 percent) is lower than that of Fresno County overall (5.6 percent).

Table 4.11-1 Current Population and Housing Stock Estimates for Clovis

	City of Clovis	Fresno County
Population (#of people)	129,121	1,037,053
Average Household Size (persons/household)	2.70	2.95
Total Housing Units (# of units) [1]	47,817	352,020
Vacant Housing Units	1,960 (4.1%)	19,713 (5.6%)

Source: California Department of Finance. 2025.

The City of Clovis's 2014 General Plan outlines long-term growth expectations based on adopted land use designations and planning assumptions. According to Table LU-1 of the General Plan, full buildout of the project area, which includes the city limits, its Sphere of Influence (SOI), and surrounding project areas, is projected to accommodate approximately 107,100 dwelling units, a population of 294,300, and 106,900 jobs.[3] Within the city limits alone, buildout is expected to support 46,000 dwelling units, 126,800 residents, and 63,200 jobs, while the SOI is projected to add another 22,600 units, 61,800 residents, and 15,000 jobs.[4]

To supplement the General Plan's projections, the 2024 Fresno Council of Governments (Fresno COG) Growth Projections report for 2023 through 2060 provides updated regional forecasts for employment. According to this report, the number of jobs within the Clovis SOI is expected to grow from 40,550 in 2022 to 51,050 by 2060, representing a 26 percent increase over the 38-year period. These projections support regional and local planning efforts, including the Sustainable Communities Strategy and updates to the Housing Element and General Plan.

[1] California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Accessed June 2025: https://dof.ca.gov/forecasting/demographics/estimates-e1/
[2] California Department of Finance. E-1 Population and Housing Estimates for Cities, Counties, and the State – January1 2024 and 2025. Accessed June 2025: https://dof.ca.gov/forecasting/demographics/estimates-e1/
[3] City of Clovis. General Plan land Use Element Table LU-1. Accessed June 2025: https://cityofclovis.com/wp-content/uploads/2018/10/Table-LU-1.pdf
[4] Fresno Council of Governments. Fresno County 2023-2060 Growth Projections. Accessed June 2025: https://agendas.fresnocog.org/wp-content/uploads/2024/10/2024-Fresno-COG-2023-2060-Growth-Projections-Draft.pdf

b. Projected Population Growth

In October 2024 the Fresno COG completed population growth projections through 2060 to assist with updating the Fresno COG Regional Transportation Plan (RTP) and the Sustainable Communities Strategy (SCS). The Fresno COG projections cover the SOIs of each of the county's 15 cities and the unincorporated area outside the cities' SOIs. Fresno COG's overall county population projection is lower than both the 2024 DOF projections and the previous Fresno COG projections for 2050 (prepared in 2020). To support the RTP/SCS process, Fresno COG disaggregated the countywide population projection to the city SOI level using a population cohort survival model that accounted for age- and race-adjusted birthrate and death rate factors to estimate the natural change in population, as well as in-migration and out-migration patterns. Fresno COG also accounted for each city's long-term development capacity based on adopted general plans. These lower projections are largely due to updated data on birth and mortality, as well as jurisdiction specific development capacity, and building activity.

Table 4.11-2 shows Fresno COG's population projections in five-year increments from 2022 through 2060. Fresno COG projections suggest a continuation of the historic trend of an increasing percentage of population growth occurring in Fresno County's bigger cities, compared with the unincorporated areas. Between 2022 and 2060, 96.7 percent of the population change is projected to occur in cities' SOIs, of which 47 percent is expected to occur within the city of Fresno, and 26 percent is expected to occur within the city of Clovis.

4.11.2 Regulatory Setting

a. Federal Regulations

There are no applicable federal regulations on population and housing that are applicable to the project.

b. State Regulations

California Housing Law

California Housing Element law (Government Code Sections 65580 to 65589.8) requires that local jurisdictions outline the housing needs of their community, the barriers or constraints to providing that housing, and actions proposed to address these concerns over an eight-year planning period. In addition, Housing Element law requires each city and county to accommodate its "fair share" of the region's projected housing need over the Housing Element planning period. Cities and counties must demonstrate that adequate sites are available to accommodate this need, and that the jurisdiction allows for development of a variety of housing types. This housing need requirement is known as the Regional Housing Needs Allocation (RHNA) and apportions to each jurisdiction a projected need. The City of Clovis 2023-2031 Housing Element was certified by the California Department of Housing and Community Development (HCD) on December 17, 2024. [5]

[5] City of Clovis. Sixth Cycle Housing Element. 2024. Accessed May 2025: https://cityofclovis.com/planning-and-development/planning/planning-projects/housing-element-update/

Table 4.11-2 Fresno County Population Forecasts (2022 to 2060)

Cities (within SOIs)	2022	2025	2030	2035	2040	2045	2050	2055	2060	Percent of Total Change 2023-2060
Clovis	126,960	129,050	136,500	142,490	148,310	153,300	156,650	158,000	157,380	25.8%
Coalinga	17,290	17,300	17,530	17,770	17,990	18,190	18,320	18,370	18,350	0.9%
Firebaugh	8,420	8,410	8,670	8,830	8,990	9,120	9,210	9,250	9,230	0.7%
Fowler	7,310	7,660	8,240	8,910	9,550	10,110	10,480	10,630	10,560	2.8%
Fresno	592,280	595,370	605,800	617,840	629,520	639,540	646,260	648,980	647,730	47.0%
Huron	6,170	6,230	6,260	6,390	6,520	6,630	6,710	6,740	6,720	0.50%
Kerman	16,830	17,360	18,510	19,650	20,750	21,700	22,340	22,600	22,480	4.8%
Kingsburg	12,750	13,210	13,750	14,550	15,340	16,010	16,460	16,650	16,560	3.2%
Mendota	12,500	12,530	130,70	13,400	13,710	13,980	14,170	14,240	14,210	1.5%
Orange Cove	9,590	9,600	9,670	9,780	9,890	9,990	10,050	10,070	10,060	0.4%
Parlier	15,030	15,040	15,060	15,200	15,340	15,450	15,530	15,560	15,550	0.4%
Reedley	25,290	25,830	25,900	26,740	27,550	28,250	28,710	28,900	28,820	3.0%
Sanger	27,040	27,040	27,540	27,940	28,330	28,670	28,900	28,990	28,940	1.6%
San Joaquin	3,670	3,610	3,640	3,670	3,700	3,720	3,740	3,750	3,740	0.1%
Selma	26,540	26,650	28,250	29,150	30,030	30,790	31,290	31,490	31,400	4.1%
Subtotal Cities	**907,671**	**914,890**	**938,390**	**962,301**	**985,520**	**1,005,450**	**1,018,820**	**1,024,220**	**1,021,730**	**96.7%**
Unincorporated	102,880	103,050	103,280	104,290	105,280	106,120	106,680	106,910	106,800	3.3%
Total County	**1,010,550**	**1,017,950**	**1,041,670**	**1,066,610**	**1,090,820**	**1,111,570**	**1,125,490**	**1,131,120**	**1,128,530**	**100.0%**

Source: Fresno Council of Governments. 2025.

Regional Housing Needs Allocation Plan

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of future housing growth needs for all income groups, as determined by the DOF. The regional councils of government (COGs), including Fresno COG , are then tasked with distributing the State-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the RHNA process. The RHNA represents the minimum number of housing units each community is required to plan for through a combination of: 1) zoning "adequate sites" at suitable densities to provide affordability; and 2) housing programs to support production of below-market rate units. Table 4.11-3 shows Fresno County's allocation from the 2013 RHNA Plan distributed among the four income categories. These categories include: very low (up to 50 percent of area median income); low (between 51 and 80 percent of area median income); moderate (between 81 and 120 percent of area median income); and above moderate income. The City of Clovis is responsible for accommodating a total of 8,977 housing units within the 6th Cycle Housing Element.

Table 4.11-3 Fresno COG Unincorporated Area Housing Needs Allocations

Jurisdiction	Very Low	Low	Moderate	Above Moderate	Total
Clovis	2,926	1,549	1,448	3,054	**8,977**
Coalinga	157	96	89	224	**566**
Firebaugh	102	46	66	229	**443**
Fowler	94	57	47	141	**339**
Fresno	9,440	5,884	5,638	15,904	**36,866**
Huron	45	45	55	174	**319**
Kerman	285	134	168	476	**1,063**
Kingsburg	248	161	150	323	**882**
Mendota	129	68	97	348	**642**
Orange Cove	66	49	86	268	**469**
Parlier	147	94	108	384	**733**
Reedley	403	183	211	666	**1,463**
Sanger	412	193	245	644	**1,494**
San Joaquin	39	28	36	97	**200**
Selma	393	165	233	701	**1,492**
Unincorporated County	706	391	370	883	**2,350**
Total	**15,592**	**9,143**	**9,047**	**24,516**	**58,298**

Source: Freno COG RHNA Plan 2022. 2025.

The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375, Steinberg)

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a SCS as part of the RTP, with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB

375, the SCS must: (1) identify the general location of land uses, residential densities, and building intensities within the region; (2) identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; (3) identify areas within the region sufficient to house an eight-year projection of the regional housing need; (4) identify a transportation network to service the regional transportation needs; (5) gather and consider the best practically available scientific information regarding resource areas and farmland in the region; (6) consider the state housing goals; (7) establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a feasible way to do so; and (8) comply with air quality requirements established under the Clean Air Act.

The City of Clovis is located in the jurisdiction of Fresno COG, a Joint Powers Agency established under California Government Code Section 6502 et seq. Pursuant to federal and State law, Fresno COG serves as a COG, a Regional Transportation Planning Agency, and the MPO for Fresno County. Fresno COG is responsible for the RTP, and meeting HCD's RHNA in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element every four to eight years. SB 375 requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

Assembly Bill 1763

AB 1763, effective January 1, 2020, amends the State Density Bonus Law (Government Code Section 65915) to allow for taller and denser 100 percent affordable housing developments, especially those near transit, through the creation of an enhanced affordable housing density bonus.

California Housing Accountability Act

This State law, originally enacted in 1982 and last amended in 2017, prevents localities from disapproving proposed developments that comply with "all applicable, objective general plan, zoning, and subdivision standards and criteria," unless they find that the development would have an unavoidable impact on public health or safety that can only be mitigated by rejecting the project or reducing its size.[6] Compliance with objective standards and criteria is defined as "substantial evidence that would allow a reasonable person to conclude" that a project complies. The Housing Accountability Act also prevents localities from disapproving or reducing the size of developments that have a minimum amount of affordable housing (either 20 percent of units for lower-income households or 100 percent of units for moderate-income households), except under specific circumstances. Mixed-use developments with at least two-thirds of their square footage devoted to residential use also qualify for this protection.

[6] California Government Code. § 65589.5. Accessed June 2025: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330^

Senate Bill 35

In 2017, California enacted SB 35 to streamline the approval of affordable housing projects. This law applies in localities that are not meeting their RHNA goals for construction of above-moderate income housing units or units for households below 80 percent of the area median income (AMI). These thresholds under SB 35 apply to the City of Clovis. Applicable localities are required to streamline the approval of eligible housing projects by providing a ministerial approval process. To qualify for streamlining, a project must meet all of a range of criteria related to affordability, including but not limited to the number of units, residential zoning, floor area dedicated to residential uses, environmental constraints, demolition of residential units, historic buildings, and consistency with objective zoning standards. The California Environmental Quality Act (CEQA) review is not required for eligible projects because they are subject to a ministerial approval process.

Housing Crisis Act

The Housing Crisis Act of 2019 (SB 330) seeks to speed up housing production in the next half decade by eliminating some of the most common entitlement impediments to the creation of new housing, including delays in the local permitting process and cities enacting new requirements after an application is complete and undergoing local review—both of which can exacerbate the cost and uncertainty that sponsors of housing projects face. In addition to speeding up the timeline to obtain building permits, the bill prohibits local governments from reducing the number of homes that can be built through down-planning or down-zoning or the introduction of new discretionary design guidelines. The bill is in effect as of January 1, 2020, and expires on January 1, 2030.

SB 330 also regulates demolition of existing housing. It prohibits urbanized jurisdictions from approving a housing development that requires demolition of residential units unless the project creates at least as many units as would be demolished. Local jurisdictions also are prohibited from approving a project that would demolish occupied or vacant “protected units,” unless the project meets several criteria (e.g., replacing all protected units, providing relocation benefits, and giving a right of first refusal to displaced residents for comparable units in the new development). Protected units are defined as subject to a covenant, ordinance, or law that restricts rent to levels affordable to people and families of lower or very low income; subject to rent control; or occupied by low or very low-income households; among other factors. These requirements for demolition do not supersede local demolition controls that are more protective of lower income households.

c. Local Regulations

Fresno Council of Governments

The Fresno COG represents Fresno County and the cities of Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma. As a regional planning agency, Fresno COG serves as a collaborative forum for addressing regional issues related to transportation, economic development, community planning, and environmental sustainability.

Regional Transportation Plan

Fresno COG’s most recent Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) was adopted in 2022 and outlines a long-range vision through 2046. This plan addresses the region’s growing population and evolving transportation needs while aiming to reduce

greenhouse gas emissions and promote sustainable development. The RTP/SCS is structured around key elements including policy direction, investment strategies, air quality compliance, and financial planning. The plan emphasizes multimodal transportation options, transit-oriented development, and equity in access to mobility. Fresno COG is currently in the process of developing the 2026 RTP/SCS, with public engagement and draft materials available through its dedicated planning portal.

Regional Housing Needs Allocation Plan

The Fresno County RHNA Plan is a state-required document updated every eight years. It guides cities and counties in planning for future housing needs as part of their general plans. The 2023–2031 RHNA Plan is Fresno COG's latest housing allocation strategy, developed in coordination with the HCD. The HCD assigns RHNA targets to Fresno COG, which then distributes these housing unit allocations to jurisdictions throughout Fresno County using a defined methodology. According to the 2023–2031 RHNA Plan, the City of Clovis is projected to need 8,977 new housing units during this cycle.

City of Clovis General Plan Housing Element

The Housing Element is one of the required elements of the Clovis General Plan, and the most recent version was certified by HCD on December 17, 2024, covering the eight year period of 2023-2031. The Housing Element assesses current and projected housing needs and sets out policies and proposals for the improvement of housing. Additionally, the Housing Element ensures the provision of adequate sites for housing to meet the needs of all economic segments of the City as determined by the City's RHNA described above. As described in Chapter 2, *Project Description*, the need to rezone for at least 1,284 affordable housing units was a result of the Judgment related to the carryover of unmet housing units from the City's 4th cycle Housing Element that were not accommodated in the City's 5th cycle Housing Element, and this infill rezoning program is independent of any rezoning programs required to fulfill the City's RHNA for the current 6th cycle Housing Element. The following are policies from the relevant General Plan Elements that would be applicable to the project.

Housing Element

Policy H-1.1 Housing Production Target. Maintain an adequate supply of appropriately zoned land to support the production of at least 8,977 housing units in Clovis between 2023 and 2031 to accommodate the local and regional housing need.

Policy H-2.6 No Net Loss of Housing Stock. Ensure that sites being redeveloped for housing do not result in a net reduction in housing units, consistent with Government Code Section 66300(d).

City of Clovis Municipal Code

The City of Clovis Municipal Code establishes regulations and requirements for each zone. Title 9, Development Code, regulates the distribution and intensity of land uses in such categories as residential, commercial, and industrial. The Development Code establishes allowable uses, minimum lot size, building height and setback limits, parking and density within each Zoning District.

4.11.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The proposed project does not involve specific development projects and so the project itself would not result in direct physical changes to population or housing. However, effects on population and housing could occur as a result of development facilitated by the proposed land use and zoning changes throughout Clovis. Future development projects could replace existing housing units or add additional units, increasing Clovis's population. Population growth could result in physical changes related to transportation, air quality, noise, and public services and utilities, as well as other environmental topics and resource areas. Population growth and housing are studied in this section. Other physical impacts are analyzed under the other sections analyzing environmental topics in this Environmental Assessment (EA).

Significance Thresholds

In accordance with Appendix G of the *CEQA Guidelines*, the proposed project would result in a significant impact on the environment related to population and housing if it would:

1. 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); or
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Pursuant to the provisions of GC § 65759, and in substantial conformance with the criteria, standards, and procedures of CEQA enacted in 1970, as amended (Public Resources Code, § 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations Title 14 § 15000 et seq.) this EA considers the project's growth-inducing impacts, and the applicable CEQA Guidelines provide that the EA "should not assume that growth is necessarily beneficial, detrimental, or of little significance." The underlying purpose of the proposed Housing Element Implementation project is to accommodate housing needs, which includes needs as a result of population growth and existing growth in Clovis. Even substantial growth is not a significant impact if it accommodates growth projections for the city that can be accommodated by existing or planned facilities and services, and is consistent with the Clovis General Plan, as well as State and regional policies and regulations. As such, a significant impact for purposes of this threshold is whether the updates to the Housing Element will induce unplanned growth.

b. Project Impacts and Mitigation Measures

Threshold 1:	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)?

Impact POP-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD FACILITATE DEVELOPMENT OF AN ASSUMED 1,303 ADDITIONAL HOUSING UNITS IN THE CITY AND ADD AN ESTIMATED 3,662 RESIDENTS. GROWTH RESULTING FROM THE PROJECT IS ANTICIPATED AND WOULD NOT INVOLVE SUBSTANTIAL UNPLANNED POPULATION GROWTH. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Development under the proposed project could add an assumed 1,303 additional residential units (up to 1,651 in the maximum potential buildout) in the city compared to existing conditions. In order to facilitate affordable housing development in the city consistent with the provisions of the court judgment, the project will rezone and redesignate 20 sites to allow for an increase in permitted densities (see Chapter 2, *Project Description*). This additional housing would lead to an estimated increase of approximately 3,662 residents in the city with a maximum potential increase of 4,640 residents.

As discussed in Chapter 2, *Project Description*, the need for at least 1,284 affordable housing units was a result of a court judgment related to the City's 4th and 5th cycle Housing Element and the rezoning and redesignation is independent of any rezoning programs from the current 6th cycle Housing Element. The HCD requires local jurisdictions to identify sufficient housing sites to cover the jurisdiction's RHNA. According to State law, a housing element must address the City's fair share of the regional housing need and specific State statutory requirements and must reflect the vision and priorities of the local community. The City was unable to meet its 4th Cycle Housing Element RHNA for lower income households. This shortfall triggered a statutory requirement under California housing law to rezone sufficient land within the first year of the 5th cycle to accommodate the unmet need.[7] The Judgment in 2024 determined the City failed to rezone sufficient property during the 5th cycle to accommodate the unmet need carried over from the 4th cycle. Accordingly, the project is separate and independent from the rezone program as part of the City's 6th Cycle 2023 – 2031 Housing Element. This rezoning to meet the minimum of 1,284 housing units was planned for in previous housing element cycles.

Fresno COG's more recent estimates have the Clovis population at 166,160 by the year 2050, 57 percent of the total buildout anticipated by the City's General Plan. The total increase in city residents from development facilitated by the project is 4,640 residents. This would increase the existing 129,121 population to 133,761 residents, well under the Clovis General Plan 2014 buildout calculations at a total buildout of 294,000. Population growth facilitated by the project would equal 1.6 percent of the total capacity of the city under the framework of the existing General Plan.

The project would not involve the extension of roads or other infrastructure since project development would be constructed within City limits and connected to existing infrastructure systems in the area on infill sites. The proposed rezoning is intended to meet the RHNA of a prior housing element based on accommodating projected population increases in the region at the time. The project is not driving newly anticipated growth, but facilitating development that was expected to occur, regardless of the rezoning, ensuring the city can respond appropriately to anticipated regional housing needs. Additionally, the total population growth of the project is only 1.6 percent

[7] California Government Code § 65583(c)(1). California Legislative Information. Accessed June 2025: https://codes.findlaw.com/ca/government-code/gov-sect-65583/

of the total anticipated buildout of the city under the existing General Plan. This would have a less than significant impact.

Threshold 2:	Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact POP-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT RESULT IN THE DISPLACEMENT OF SUBSTANTIAL NUMBERS OF PEOPLE OR HOUSING. THE PROPOSED PROJECT WOULD FACILITATE THE DEVELOPMENT OF NEW HOUSING AT HIGHER DENSITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Nine of the Infill Rezone Program sites are vacant; there are no existing housing units or temporary housing accommodations on those project sites. Therefore, the project would not displace existing housing units or people on these sites. Another nine of the sites are currently occupied with low density uses such as single family homes on a large lot. Two of the sites contain buildings currently used for commercial businesses. Development facilitated as a result of the project on sites with existing units would replace any existing residences at greater densities than with previous zoning and land use designations. Existing Housing Element programs and policies, such as Policy H-2.6 No Net Loss of Housing Stock, which ensures that sites being redeveloped for housing do not result in a net reduction in housing units, consistent with state law[8], reduce the impact on displacement of people due to future housing development by requiring replacement of any housing being replaced. The project sites would be rezoned and redesignated to ensure that development would occur at higher densities than under existing zoning and General Plan Land Use designations. There would be a less than significant impact on substantial numbers of existing people or housing being displaced from development facilitated by the project.

Mitigation Measures

No mitigation measures are required.

4.11.4 Cumulative Impacts

The geographic scope of cumulative impacts of population and housing is the entire region, as housing availability in the City of Clovis can affect if people need to move to neighboring areas in the region to find housing. Therefore, this cumulative impact analysis is based on Fresno COG's 2022 RTP/SCS and Fresno County's most recent RTP/SCS. The proposed Infill Rezone Program would accommodate projected citywide population and housing growth under the City's 4th cycle Housing Element. By its nature, the impact analysis under Impact POP-1, discussed above, considers cumulative impacts associated with population growth throughout the city and consistent with the Clovis General Plan. The proposed project incorporates regional growth anticipated by Fresno COG's 4th housing cycle RHNA projections and thus considers cumulative growth. The proposed project would therefore not considerably contribute to a significant impact associated with unplanned population growth.

Implementation of the proposed project would accommodate the need for affordable housing as required by the terms of a judgment entered in the *Martinez v. City of Clovis* case in March 2024. The proposed project would result in an overall net increase of affordable housing units in the city, as discussed in Chapter 2, *Project Description*, and would not result in substantial displacement of people or housing. The project would directly result in the demolition of some existing housing units

[8] California Government Code § 66300(d). (2023). *California Legislative Information*. Accessed June 2025: https://codes.findlaw.com/ca/government-code/gov-sect-66300/

within the city; however, development facilitated by the project would allow for more units beyond what was demolished on each of those Infill Rezone Program sites. The 20 Infill Rezone Program sites were selected to minimize the loss of existing housing and to promote the growth of affordable housing. Continued implementation of existing City regulations and the 2023-2031 Housing Element would also preserve existing housing stock and assist those at risk of displacement. As a result, implementation of the proposed project would not considerably contribute to a significant cumulative impact from the displacement of substantial numbers of existing housing units or people.

Mitigation Measures

No mitigation measures are required.

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4.12 Public Services and Recreation

This section assesses potential impacts related to public services, including fire and police protection, public schools, parks and recreation facilities from the rezoning facilitated by the project. Impacts on water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.16, *Effects Found Not to be Significant*.

4.12.1 Setting

a. Fire Services and Emergency Medical Services

Clovis Fire Department

The Clovis Fire Department (CFD) participates in a statewide mutual-aid system that provides fire department resources throughout the State of California. On a local basis, CFD provides fire protection to the City of Clovis and supplements protection through an automatic aid agreement with the Fresno Fire Department west and south of the City's Sphere of Influence (SOI) and the Fresno County Fire Protection District (FCFPD) to the north and east of the City's SOI.

The CFD represents 20 square miles and approximately 123,665 residents. The CFD operates six fire stations and one training center. Each station contains a minimum staffing capacity of 19 staff members per shift, including one battalion officer, six captains, six engineers, and six firefighters. A summary of the station locations and equipment is provided in Table 4.12-1.

Table 4.12-1 Clovis Fire Department Stations

Station	Address	Equipment
Station 1	633 Pollasky Avenue	Truck, Reserve Truck
Station 2	2300 Minnewawa Avenue	Engine, Reserve Engine, Urban Search and Rescue Unit
Station 3	555 North Villa Avenue	Engine, Reserve Engine
Station 4	2427 Armstrong Avenue	Engine, Water Tender, Brush Engine
Station 5	790 North Temperance Avenue	Engine, Hazmat Unit, OES Engine
Station 6	2388 Encino Avenue	Engine

Source: City of Clovis Emergency Services, 2025

The CFD 2022-2027 Strategic Plan indicates the CFD has a response time goal of arrival within four minutes or less for 90 percent of calls.

Fresno County Fire Protection District

The FCFPD provides fire services on the City's fringe and unincorporated areas in the City's SOI. FCFPD is one of five special districts in Fresno County that provides fire protection to the unincorporated areas of the county. There are currently two FCFPD fire stations that serve the project area. One is in the City (Station 85) and one outside of the SOI (Station 86). A summary of the equipment and staffing at these two stations is provided in Table 4.12-2.

Table 4.12-2 Fresno County Fire Protection District Equipment Summary

Station	Address	Equipment
North Clovis Station 85	1392 Nees Avenue	Type I, Triple Combination Pumper (Fire Engine), ¾ Ton Common Vehicle
Clovis Lakes Station 86	4925 N Nelson Avenue	Type I, Triple Combination Pumper (Fire Engine), Type I, Heavy Water Tender

Source: Fresno County Fire Protection District, 2025

b. Police Services

The Clovis Police Department (CPD) provides police protection services for Clovis. The department is comprised of 219 employees, of which 116 are sworn officers. The department includes a Patrol Division, Communications Division, Investigations Division, Youth Services Division, Support Services Division, Animal Services Division, and Administration Division, working with the community to address crime and quality of life issues. The City of Clovis Police Department 2024 End of Year Report indicates the CPD has an average response time of 3.1 to 4.5 minutes.

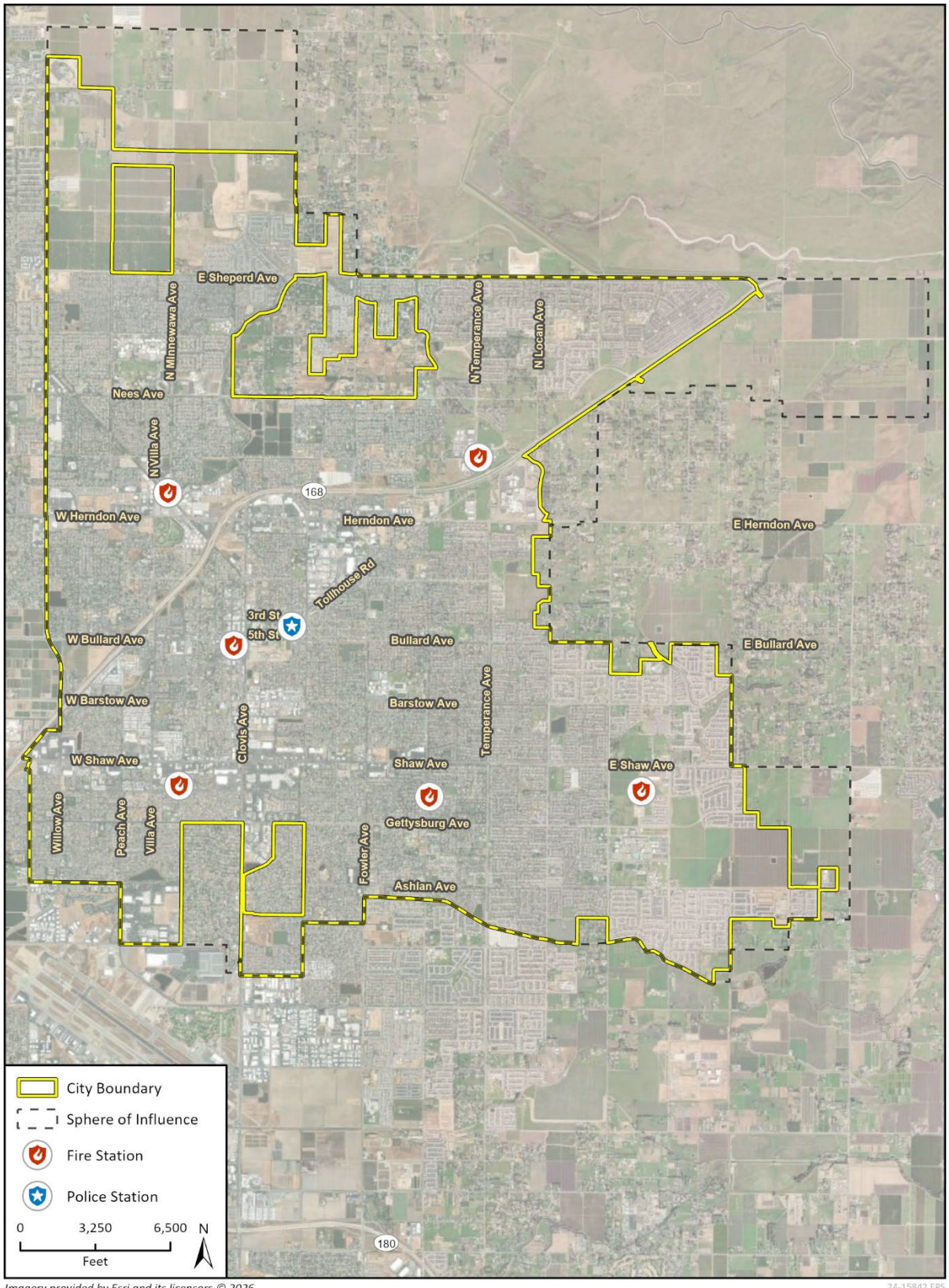
c. Schools

The Clovis Unified School District (CUSD) operates 18 elementary schools (K-5th grade), three middle schools (6th-8th grade), three high schools (9th-12th grade), and five alternative education/other schools (community day schools, Special Day Class (SDC) schools, charter, continuation, and coeducational schools) within the City of Clovis. CUSD operates 15 grade schools and two middle and high schools within the City of Fresno. The Fresno County Office of Education operates an additional elementary school, Clovis Global Academy, within city limits. There are also six private schools operating in the city. Table 4.12-3 lists the schools, location, and 2023-2024 enrollment for all schools in Clovis. The locations of these schools are shown on Figure 4.12-2. In addition to the schools listed below, the Terry P. Bradley Educational Center opened for the 2025-2026 school year. The Terry P. Bradley Educational Center is CUSD's fourth educational center, and is home to Clovis South High School, Phillip V. Sanchez Intermediate School, and a future elementary school, with an estimated capacity of 1,500 middle school and 2,500 high school students. Elementary school capacity is not yet known.

The District's school building capacity in 2024 was determined to be 22,040 for grades TK-6, 6,486 for grades 7-8, 12,494 for grades 9-12, and 342 for SDC Severe[1]. With the addition of the Terry Bradley Education Center, CUSD's capacity for grades 7-8 increases to 7,986, and grades 9-12 increases to 14,994. CUSD spans across the City of Clovis and the City of Fresno. For the purposes of this project, this analysis focuses on schools in Clovis. However, CUSD schools within the City of Fresno are available for students living within Clovis city limits which would support student capacity. Table 4.12-3 shows each schools enrollment and Table 4.12-4 breaks down the facility capacity for each grade level within the City of Clovis.[2]

[1] School Facilities Needs Analysis. https://files.smartsites.parentsquare.com/6245/clovis_usd_sfna_2025.pdf
[2] Table 4.12-3 only represents CUSD capacity within the City of Clovis; however, CUSD schools within the City of Fresno would be available to students within Clovis city limits if Clovis schools are over capacity.

Figure 4.12-1 Fire and Police Stations



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Additional data provided by City of Clovis, 2025.

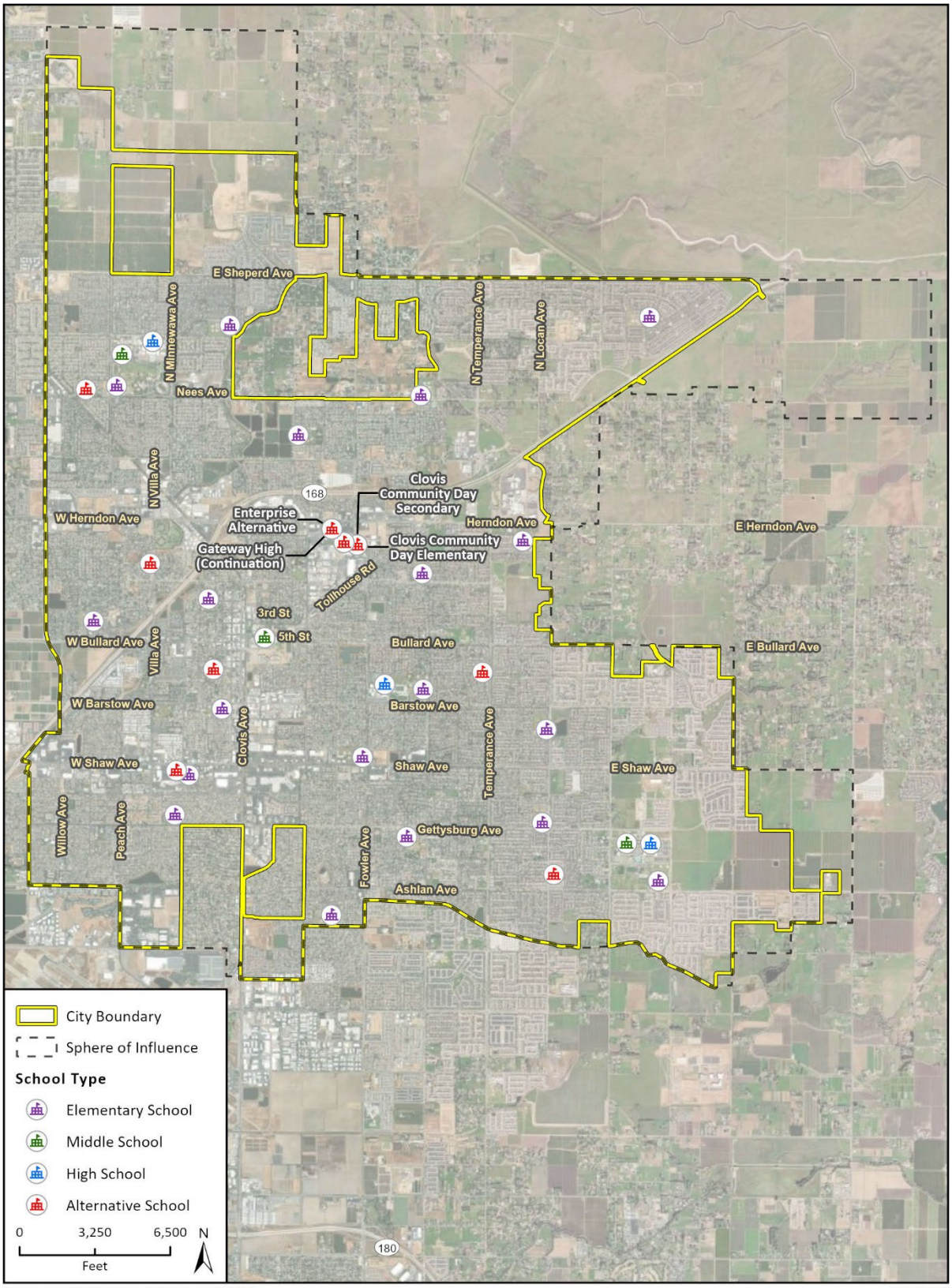
24-15842 EPS
Fig X Fire and Police Stations

Table 4.12-3 Schools and Enrollment for Clovis, 2023-2024

School Name	Address	2023-2024 Enrollment
Clovis Global Academy	44 Shaw Avenue	268
Clovis Community Day Elementary	1715 David E Cook Way	4
Clovis Community Day Secondary	1715 David E Cook Way	38
Woods (Harold L.) Elementary	700 Teague Avenue	748
Reagan Elementary	3701 Ashlan Avenue	762
Bud Rank Elementary	3650 Powers Avenue	748
Clovis Online School	1655 David E Cook Way	667
Enterprise Alternative High School	1550 Herndon Avenue	52
Gateway High School	1550 Herndon Avenue	233
Buchanan High School	1560 North Minnewawa Ave.	2,668
Clovis East High School	2940 Leonard A Avenue	2,632
Clovis High	1055 Fowler Avenue	2,302
Cole Elementary	615 West Stuart Ave.	592
Dry Creek Elementary	1273 North Armstrong Avenue	735
Jefferson Elementary	1880 Fowler Avenue	532
Tarpey Elementary	2700 Minnewawa Avenue	652
Sierra Vista Elementary	510 Barstow Avenue	532
Weldon Elementary	150 DeWitt Avenue	532
Clark Intermediate	902 Fifth Street	1,276
Miramonte Elementary	1590 Bellaire Avenue	532
Mickey Cox Elementary	2191 Sierra Avenue	662
Gettysburg Elementary	2100 Gettysburg Avenue	592
Red Bank Elementary	1454 Locan Avenue	626
Alta Sierra Intermediate	380 West Teague Avenue	1,302
Garfield Elementary	1315 North Peach Avenue	565
Cedarwood Elementary	2851 Palo Alto Avenue	701
Clovis Elementary	1100 Armstrong Avenue	730
Reyburn Intermediate	2901 DeWolf Avenue	1,381
Century Elementary	965 North Sunnyside Avenue	592
Freedom Elementary	2955 Gettysburg Avenue	748
Charlie Keyan Armenian Community School	108 North Villa Avenue	N/A
Valley Crescent School	547 West Nees Avenue	N/A
Clovis Christian School	3105 Locan Avenue	N/A
Spectrum Center Clovis	30 W Shaw Avenue Clovis, CA 93612	N/A
Our Lady of Perpetual Help	836 Dewitt Avenue	N/A
Sierra View Christian Academy	3268 Wrenwood Avenue	N/A
Total 36		23,752 (excluding schools without attendance data)

Source: Clovis Unified School District

Figure 4.12-2 Public Schools in Clovis[3]



Imagery provided by Esri and its licensors © 2026.
Additional data provided by City of Clovis, 2025.

24-15842 EPS
Fig X Schools

Table 4.12-4 Clovis Unified School District Facility Capacity in the City of Clovis

Grade Level	Facilities Capacity	District Enrollment (2024)	Over Capacity?
TK-6	10,859	11,472	Yes
7-8	3,959	4,596	Yes
9-12	7,602	8,305	Yes
Special Day Class (SDC) Severe	342	1,395	Yes

d. Parks and Recreational Facilities

The City categorizes its parks and recreational facilities based on type, acreage, and population served. These classifications are listed in Table 4.12-5. The City owns and/or operates 12 area parks, 11 basin parks, 5 community parks, 65 neighborhood parks, and 10 pocket parks, for a total of 323 acres of park space provided by the City. The City also has an agreement with CUSD that allows for the use of school recreational facilities by Clovis residents outside of school hours.

Basin parks operated by the Fresno Metropolitan Flood Control District (FMFCD) are also available for the City's recreational needs. The uses of basin parks are limited to dry periods, due to their first priority as flood control facilities, and only acreages available for recreational purposes are listed in Table 4.12-6. Recreational opportunities are provided to residents through a contractual agreement between FMFCD and the City. There are currently three basin parks in the City that are approximately to 21.13 acres in total.

The State has an established parkland-to-population recommendation of 4.0 acres of parkland per 1,000 persons. The City's 2024 population was estimated to be 129,121 and maintains approximately 2.2 acres of parkland per 1,000 persons.

Clovis Recreation (CAR) Department also provides recreational programs including adult and youth sports programs, leagues, and drop-in games. CAR provides basketball, softball, indoor co-ed soccer, floorball, and inline hockey leagues at the City of Clovis Recreation Center and Rotary Park. Additional recreational facilities include a batting range at Sierra Bicentennial Park and a 27,000-square foot skate park at Letterman Park.

In addition to these facilities, the City maintains 28 miles of trails, including the Clovis Old Town trail, Dry Creek Trail, Enterprise Trail, and PG&E Trail. The City also partners with the Fresno Irrigation District under the Master Clovis Trails and Right-of-Way Use Agreement and Memorandum of Interpretation, which allows the City to connect existing trails and extend the trail system by using canal banks.

The City's current inventory of parks and recreational facilities are outlined in Table 4.12-5 and listed in Table 4.12-6 City Parks.

[3] Two schools (Enterprise Alternative High School and Gateway High School) share the same campus, resulting in the depiction of 34 schools in Figure 4.12-2 compared to the 36 schools listed in Table 4.12-4.

Table 4.12-5 Park Classifications

Classification	Acres (per 1,000 population)	Size Range (acres)	Population Served	Service Radius
Pocket Park	–	Up to 1	Up to 500	Sub neighborhood
Neighborhood Park	1	1-2	500-2,500	¼ mile
Area Park	1-2	3-20	2,000-10,000	¼ - ½ mile
Community Park	2-5	15-100	10,000-50,000	½ - 3 miles
Regional Park	5	100+	Entire population	Within ½ hour
School Park (Clovis Unified School District Campuses)	–	20-40	Varies	Neighborhood to community-wide
Basin Park	–	Varies	Varies	Neighborhood to community-wide

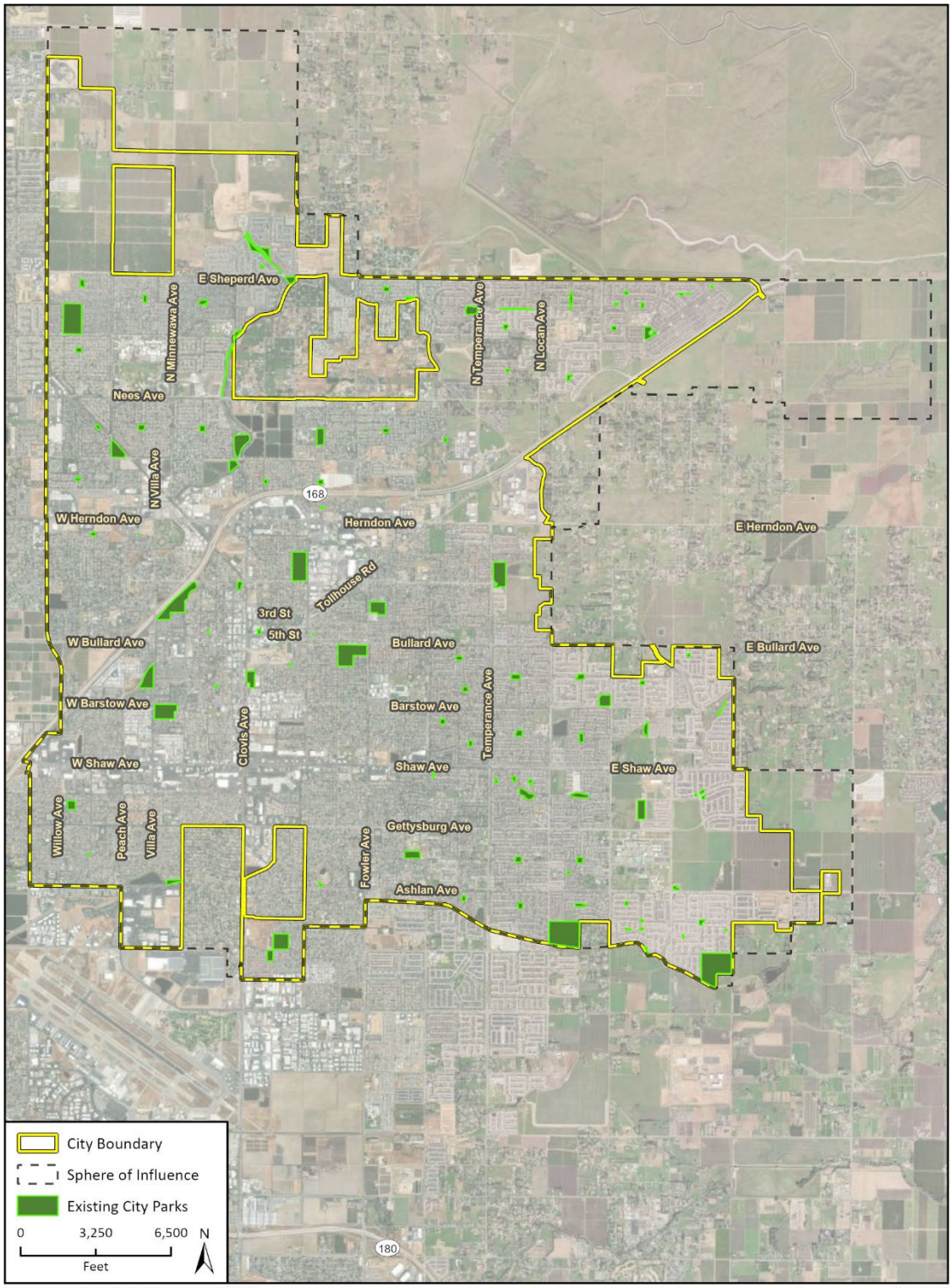
Table 4.12-6 City Parks

Park	Park Area (acres)
Deauville	3.67
Town & Country	0.58
Town & Country	1.06
Pinnacles	1.05
Northwood Estates	0.49
Rancho Paloma II	0.98
Century	5.00
Cambridge Colony	1.34
Quail Hollow	1.43
Williamsburg Manor II	0.65
Sierra Bicentennial	17.69
Bean	0.72
Treasure Ingmire	1.44
Fox Run	1.94
Rotary	13.30
Westcal	1.03
Monte Vista 21	1.02
Letterman	8.73
Monte Vista 10	0.99
Silverton 2	0.84
California Countrywood	1.67
Thorburn	3.87
San Gabriel	2.98
Helm and Holland	0.17
Basin 1E	0.42
Gettysburg	4.76
Summit 5	1.41

Park	Park Area (acres)
Summit 4	1.18
Seville Estates 2	0.79
Westcal II	2.64
Kiwanis	0.27
Fifth/Harvard	0.18
Music	0.17
Los Arbolitos	2.86
Cell Tower	1.27
Village Green	6.22
Pasa Tiempo	5.27
Basin DP	32.62
Basin DO	31.40
Basin BW	10.04
Basin BC	23.43
Basin 5F	7.69
Basin 5B5C	19.39
Basin 4E	19.99
Basin 4D	4.96
David McDonald	12.29
Dry Creek	9.37
Bermuda Triangle	1.03
European Parc	1.27
Tract 5486	0.37
Tract 5486	0.64
Harlan Ranch	3.70
Sun River	0.35
Countryside	1.05
Portland	0.35
Railroad	6.51
Tract 6107	0.60
Tract 6086	0.21
Tract 6107	0.42
Sierra View	0.85
Palmina	1.56
East West	1.40
Gallery	0.49
Tract 5194	1.08
Cottonwood	2.95
Blackhorse Estates II	0.65
Monte Vista 31	0.93

Park	Park Area (acres)
Monte Vista 26	0.30
TR 5605	0.30
Pump House	0.78
Wawona Ranch Dry Creek Trail	1.85
Chadwick	0.24
Helm Ranch	2.01
Regent	0.36
Santerra	0.12
Wooten	1.97
Deauville East	0.92
Descanso	0.41
Bloom Field	3.20
Pasa Tiempo North	1.60
Arrowhead	0.29
Bunny	0.28
Regent	0.30
Dry Creek Trailhead	2.10
Tract 5486	0.44
Tenaya Sun Ranch	0.06
Bullard/Fifth Couplet	0.10
Liberty	0.67
Johnboy	0.79
Tract 4532	0.42
Tract 4532	0.77
Tract 4998	0.62
Soledad	0.99
Lennar	1.50
Birchwood Estates	0.64
Linear	1.54
Total	**323.24**

Figure 4.12-3 City Parks



4.12.2 Regulatory Setting

a. State Regulations

Fire Protection

California Fire and Building Code

The State of California provides minimum standards for building design through the California Building Code (CBC), which is located in Part 2 of Title 24, California Building Standards Code, of the California Code of Regulations (CCR). The CBC is based on the International Building Code but has been amended for California conditions. It is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Every three years, the California Fire Code is reviewed and modified where applicable and adopted by the California Building Standards Commission. The California State Fire Marshals Office has adopted the most recent California Fire Code (CFC). The City of Clovis Municipal Code 4.4.101 and 4.4.102 contains these standards, which are adopted or modified as necessary to ensure the safety of the community based on unique climatic, geological or topographical conditions. Commercial and residential buildings are plan-checked by Prevention personnel within CFD for compliance with the CFC. Typical fire safety requirements of the CFC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California Code of Regulations

The CCR, Title 5 Education Code, governs all aspects of education within the State. California State Assembly Bill (AB) 2926 – School Facilities Act of 1986 – was enacted by the State of California in 1986 and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees which may be collected under this and any other school fee authorization are $1.50 per square foot ($1.50/ft^2) for residential development and $0.25/ft^2 for commercial and industrial development. AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government code. Under this statute, payment of statutory fees by developers serves as total mitigation under the California Environmental Quality Act (CEQA) to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

California Fire Service and Rescue Emergency Aid System

Clovis Fire Department participates in the California Fire Service and Rescue Emergency Mutual Aid System through which the California Governor's Office of Emergency Service (OES), Fire and Rescue Division is responsible for the development, implementation and coordination of the California Fire Service and Rescue Emergency Mutual Aid Plan (Mutual Aid Plan) (Governor's Office of Emergency Services, Fire and Rescue Division 2023). The Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and State levels, and divides the State into six mutual aid regions to facilitate the coordination of mutual aid. Clovis is located in Region V.

Through the Mutual Aid Plan, the OES is informed of conditions in each geographic and organizational area of the state, and the occurrence or imminent threat of disaster.

California Governor's Office of Emergency Services (Cal OES)

In 2009, the State of California passed legislation creating the Cal OES and authorized it to prepare a Standard Emergency Management System (SEMS) program (Government Code (GC) Section 8607; Title 19 CCR Section 2401 et seq.), which sets forth measures by which a jurisdiction should handle emergency disasters. In California, SEMS provides the mechanism by which local government requests assistance. Non-compliance with SEMS could result in the state withholding disaster relief from the non-complying jurisdiction in the event of an emergency disaster. Cal OES coordinates the state's preparation for, prevention of, and response to major disasters, such as fires, floods, earthquakes and terrorist attacks. During an emergency, Cal OES serves as the lead state agency for emergency management in the state. It also serves as the lead agency for mobilizing the state's resources and obtaining federal resources. Cal OES coordinates the state response to major emergencies in support of local government. The primary responsibility for emergency management resides with local government. Local jurisdictions first use their own resources and, as they are exhausted, obtain more from neighboring cities and special districts, the county in which they are located, and other counties throughout the state through the statewide mutual aid system. California Emergency Management Agency (Cal-EMA) maintains oversight of the state's mutual aid system.

Public Schools

Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as the Greene Act), enacted in 1998, is a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions and may be eligible for additional State funding through the Office of Public School Construction.

The Greene Act permits the local district to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. The Act also sets a maximum level of fees a developer may be required to pay. Pursuant to GC Section 65996, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to less than significant.

Parks and Recreation

Quimby Act (California Government Code Section 66477)

California GC Section 66477, also known as the Quimby Act, was enacted by the California legislature in 1965. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative tract map or parcel map.

b. Local Regulations

City of Clovis General Plan

Clovis's General Plan was adopted in August 2014 and consists of the Land Use, Economic Development, Circulation, Housing, Public Facilities and Services, Environmental Safety, Open Space and Conservation, and Air Quality Elements. All elements bear equal weight, and no element has legal precedence over another. California GC Section 65583(c) requires the Housing Element to maintain internal consistency with other General Plan Elements. The following public services and recreation policies are applicable to the project as part of the Land Use, Circulation, Environmental Safety, Open Space and Conservation, and Public Facilities and Services Elements[4]:

Land Use Element

The Land Use Element describes existing land use patterns and provides the physical framework for land use and development in the City. The Land Use Element also contains policies to improve the City's visual quality and livability, including its compatibility between neighborhoods, mixed-use areas, commercial areas, and industrial areas. It describes the economic context and sets out goals and policies to ensure new development is planned in coordination with infrastructure, public services, and recreation.

Policies

- **Policy 3.7:** Development is encouraged to provide a mix of housing types, unit sizes, and densities at the block level. To accomplish this, individual projects five acres or larger may be developed at densities equivalent to one designation higher or lower than the assigned designation, provided that the density across an individual project remains consistent with the General Plan.
- **Policy 5.1:** The Clovis General Plan has been planned to provide a variety of housing product types suitable to each stage of a person's life. Each development should contribute to a diversity of housing sizes and types within the standards appropriate to the land use designation.

Circulation Element

The Circulation Element describes the existing transportation patterns and provides the framework for transportation development in the City. The Circulation Element also contains goals, policies, and specific measures to improve the City's efficiency and safety of the City's transportation system.

Policies

- **Policy 1.4:** Encourage infill development that would provide jobs and services closer to housing, and vice versa, to reduce citywide vehicle miles traveled and effectively utilize the existing transportation infrastructure.
- **Policy 3.4:** Minimize roadway width as feasible to serve adjacent neighborhoods while maintaining sufficient space for public safety services.

[4] City of Clovis General Plan, 2014.

Environmental Safety Element

The Environmental Safety Element focuses on the protection of the community from environmental and man-made hazards, specifically regarding natural disasters, hazardous materials, and noise. The Environmental Safety Element also establishes goals, policies, and specific measures to support public services, such as law enforcement, fire protection, and emergency medical services, to minimize danger to residents, workers, and visitors.

Policies

- **Policy 1.2:** Maintain a water system to provide adequate peak water supply and system redundancy for firefighting services.
- **Policy 1.5:** Locate and design critical and public facilities to minimize their exposure and susceptibility to flooding, seismic and geological effects, fire, and explosions. Ensure critical use facilities can remain operational during an emergency.

Open Space and Conservation Element

The Open Space and Conservation Element describes existing open space, parks, productive agricultural areas, and environmental resources, and establishes goals for the maintenance and provision of new and existing state parks. The element also contains goals, policies, and specific measures to preserve and enhance open space, parks, water quality, and recreation.

Policies

- **Policy 1.1:** Provide a minimum of 4 acres of public parkland for every 1,000 residents.
- **Policy 1.2:** Upgrade and rehabilitate existing parks as necessary to meet the needs of the community and as the financial resources of the city allow.
- **Policy 1.3:** Provide a variety of parks and recreation facilities in underserved and growing areas of the community.
- **Policy 1.8:** Require new development to provide pocket and neighborhood parks, dedicate land for area parks, and pay impact fees for community and regional parks. Require new development to establish lighting and landscape maintenance districts to fund operations and maintenance.

Public Facilities and Services Element

The Public Facilities and Services Element defines the nature and types of public facilities, services, and activities necessary to maintain a high quality of life in Clovis. The Element aligns funding resources with the level of service the community expects, and contains goals, policies, and specific measures to maintain public safety, quality of schools, and other valued public facilities.

Policies

- **Policy 1.1:** New development shall pay its fair share of public facility and infrastructure improvements.
- **Policy 3.4:** Partner with public and private educational institutions to jointly use facilities for both civic and educational purposes.
- **Policy 6.1:** Maintain staffing, facilities, and training activities to effectively respond to emergency and general public service calls.

City of Clovis Municipal Code

The City of Clovis Municipal Code identifies land use categories, development standards, and other general provisions that ensure consistency between the City's General Plan and proposed development projects. The following provisions from the City's municipal code focus on park service impacts associated with new development projects and are relevant to the project:

- **Chapter 3.4, Section 3.4.03 (Park Acquisition and Development Fees):** Requires developers to pay a fee for new residential developments, hotels, motels, assisted living facilities, commercial, professional, and industrial buildings. The park acquisition and development fees are based on land use type and are adjusted annually to reflect actual land acquisition and construction costs. Fees go to acquiring and furnishing future parks and recreational facilities. Refer to Table 4.12-7 for the 2025 Parks Acquisition and Development Fees.

Table 4.12-7 Park Acquisition and Development Fees

Land Use Type	Fee	
All Residential	$6,147	per unit
Retail	$0.75	per building square foot
Office	$1.63	per square foot
Industrial	$0.53	per building square foot

Source: City of Clovis Master Development Fee Schedule, 2024-2025

City of Clovis Parks Master Plan

The City of Clovis Parks Master Plan adopted in March 2018 provides guidance in the provision of park services to best develop, promote, utilize, manage, and maintain a functional park system for the City of Clovis. The Master Plan provides a strategic action plan for the next 5 to 10 years, which identifies methods to develop public-private partnerships to improve the parks and trails systems, and address future growth of the City and identify opportunities that will expand the City Parks Division and address the needs of the growing community in Clovis.

4.12.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The project involves the rezoning and redesignating of 20 Infill Rezone sites to satisfy RHNA requirements from the City of Clovis 4th cycle Housing Element as required by the Judgment. The following discussion describes the methodology used to evaluate the significance of impacts to public services and recreation from population growth facilitated by the project.

This analysis considers whether the proposed rezoning, including future development accommodated by the project, would result in impacts related to the provision of public services and recreation. Public services information was acquired through review of relevant documents from the CFD, CPD, and CUSD. The determination that the project would or would not result in substantial adverse effects concerning public services considers the relevant policies and regulations established by State, local, and regional agencies, the project's compliance with such policies, and

whether the project would create the need for new or expanded facilities, the construction of which could result in environmental impacts.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to public services and recreation from implementation of the project would be significant if it would:

1. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for any of the public services:
   a. Fire protection;
   b. Police protection;
   c. Schools;
   d. Parks; or
   e. Other public facilities;
2. 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; or
3. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Impacts related to thresholds 1(a), 1(b), 1(c), 1(d), 1(e) for libraries, 2 and 3 are analyzed below. Impacts related to other public facilities (Threshold 1(e)) for water, wastewater and landfills are addressed in Section 4.16, *Effects Found Not to be Significant*.

b. Project Impacts and Mitigation Measures

Threshold 1a:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

IMPACT PSR-1 FUTURE DEVELOPMENT FACILITATED BY THE PROJECT WOULD RESULT IN AN INCREASE OF POPULATION AND BUILDING CAPACITY WITHIN CLOVIS. THIS WOULD INCREASE DEMAND FOR FIRE PROTECTION SERVICES, WHICH COULD RESULT IN THE NEED FOR NEW OR EXPANDED FIRE PROTECTION FACILITIES. NONETHELESS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Fire protection services in Clovis are provided by the CFD which operates out of six fire stations. The project would not expand the current service area but would result in an increased population within the existing service area. The increase in residents associated with the project could increase demand for fire protection and emergency medical services such that additional staff, equipment, or facilities would be needed to meet this goal.

Development facilitated by the project would increase calls for service for issues including, but not limited to, emergency medical service, structure or vegetation fires, and traffic collisions. The direct effect on CFD would include evaluation of staffing and resource deployment to accommodate the

increase in call volume throughout the community. In 2023, CFD responded to 13,242 incidents[5] annually for approximately 123,665 residents which is approximately 0.1 incidents per resident (13,242 / 123,665 = 0.1). Therefore, development facilitated by the project is estimated to induce an additional 464 annual incidents (4,640 maximum additional residents x 0.1 incidents per resident = 464). While an increase in population could result in 2.7 percent more incidents per year, the project would increase population incrementally within planned amounts and across the 20 Infill Rezone sites as new development is proposed, which would not result in the need to construct new or expanded facilities beyond what was planned for in the Clovis General Plan. Additionally, population growth and demand for public services is acknowledged and addressed in the Clovis General Plan Environmental Safety Element.

Therefore, the project would not result in significant environmental impacts associated with the need for the provision of new or physically altered fire protection facilities, and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 1b:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

IMPACT PSR-2 DEVELOPMENT FACILITATED BY THE PROJECT WOULD INCREASE THE POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES. HOWEVER, THIS INCREASE WOULD NOT REQUIRE ADDITIONAL AND/OR EXPANDED POLICE PROTECTION FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.11, *Population and Housing*, development facilitated by the project would add an estimated 3,662 residents or a maximum 4,640 new residents to the City, increasing Clovis's population from 129,121 to 133,761. Based on the CPD's current staffing level of approximately 116 sworn officers, the officer/resident ratio would drop from 0.81 to approximately 0.78 sworn officers per 1,000 residents. The City currently does not have standards set for its service ratio.

Policy 6.1 in the Clovis General Plan Public Facilities and Services Element requires the City to maintain staffing, facilities, and training activities to effectively respond to emergency and general public service calls. Additional demand for police service would be accommodated through the planned expansion of policy personnel and facilities to continue to maintain adequate police protection services. Policy 6.2 of the Public Facilities and Services Element requires the City to conduct service level studies to analyze crime and emergency service performance data to evaluate the effectiveness of prevention and reduction strategies, and to allocate resources accordingly. Police protection service levels would continue to be evaluated and maintained by CPD in accordance with existing policies, procedures and practices as development occurs over the lifetime of the project. The project would not result in a population above the Clovis General Plan projected

[5] Clovis Fire Department. SOC and Annual Report. 2023. Accessed October 2025: https://www.clovisca.gov/services/fire/about/soc_annual_report.php

buildout, nor would it concentrate development in a single location; therefore, the project would not result in a need for additional police facilities beyond what is currently planned.

The project itself would not result in the need for new or expanded police facilities; therefore the impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 1c: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

IMPACT PSR-3 DEVELOPMENT ACCOMMODATED BY THE PROJECT WOULD RESULT IN AN INCREASE IN STUDENT ENROLLMENT IN CLOVIS, BUT WOULD NOT RESULT IN NEW SCHOOLS BEYOND WHAT IS PLANNED OR RESULT IN SUBSTANTIAL ADVERSE PHYSICAL IMPACTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would incrementally increase the population across the city, but it would not result in a population above the Clovis General Plan projected buildout, nor would it concentrate development in a single location; therefore, the project would not result in a need for additional or expansion of schools within the City of Clovis or CUSD as there would only be an incremental increase in students at any given school within CUSD. Implementation of the project would add an estimated 1,303 dwelling units and 3,662 new residents, in which some of those residents would be school-aged children. Based on student generation rates from CUSD[6], the project could generate an estimated 253 students, including 159 elementary school students, 33 middle school students, and 61 high school students. Although CUSD schools within the City of Clovis are over capacity, CUSD has available capacity at other schools within the district, including schools in the City of Fresno. CUSD policy is to identify available space for students in nearby schools when the closest school is at capacity. With the opening of the Terry Bradley Education Center in Fresno County, CUSD has capacity for 1,068 middle school students and 2,145 high school students prior to project approval. CUSD manages enrollment through district-wide policies, including boundary adjustments and student transfers, ensuring that all students have access to a school within the district, even if not at a specific preferred site. Table 4.12-8 shows the breakdown of student generation from the project by grade level and estimated available capacity after the project.

Table 4.12-8 Estimated Student Generation From Project

Grade Level	Students Per Household	Dwelling Units	Total Students Generated	District Available Capacity in Clovis	Exceeds Capacity?
TK through 6	0.1213	1,303	159	0	Yes
7 through 8	0.0250	1,303	33	0	Yes
9 through 12	0.0462	1,303	61	0	Yes

Source: Clovis Unified School District

[6] School Facilities Needs Analysis. https://files.smartsites.parentsquare.com/6245/clovis_usd_sfna_2025.pdf

As shown in Table 4.12-8, enrollment capacity for CUSD schools in Clovis city limits as of school year 2023 to 2024 would not accommodate the estimated 253 students assumed as part of the project, as middle and high school facilities prior to the project are over capacity. However, in addition to CUSD's enrollment management strategies described above and opening of the Terry Bradley Educational Center, CUSD would also offset the project's potential impact to schools by implementing developer fees which reduce potential student impacts from development activity. Any development facilitated by the project would be subject to these State-mandated school impact fees and collected at the time of building permit issuance. Pursuant to Section 65995.5 of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." The fees for 2025 are summarized in Table 4.12-9.

Table 4.12-9 2025 Clovis Unified School District Developer Fee Collection Rates

Grade Level	Fee Rate per Square Foot
Residential Construction (Level 2)	$5.86
Residential Additions/Remodels (Level 1)	$5.17
Commercial/Industrial	$0.84

Source: Clovis Unified School District

CUSD is the agency responsible for providing adequate classrooms and the City of Clovis does not have authority to require CUSD to construct additional classrooms or schools within city limits. CUSD is a government agency independent from the City of Clovis with separate jurisdictional boundaries, responsibilities, and governing board. Because they are governed independently from the City of Clovis (School Board compared to Clovis City Council), the City does not have the authority to require CUSD to take any actions such as building new schools. Therefore, as described above, existing laws and regulations such as the development impact fees would require funding for the provision or expansion of new school facilities to offset impacts from new residential development, and CUSD policies for accommodating new students within the District would provide sufficient student capacity for the anticipated student growth from the project. Therefore, through compliance with applicable regulations and the payment of developer fees, development facilitated by the project would have a less than significant impact.

Mitigation Measures

No mitigation measures are required.

Threshold 1e:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, or the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

IMPACT PSR-4 DEVELOPMENT UNDER THE PROJECT WOULD INCREMENTALLY INCREASE THE CITY POPULATION AND INCREASE THE USE OF EXISTING PUBLIC FACILITIES, SUCH AS LIBRARIES. IMPACTS RELATED TO THE PROVISION OF NEW OR PHYSICALLY ALTERED PUBLIC FACILITIES WOULD BE LESS THAN SIGNIFICANT.

The Clovis Regional Library is the main library in the City of Clovis, and is part of the 38-library Fresno County library system. The Clovis Regional Library is open Monday through Friday from 9 am to 9 pm, Saturday from 9 am to 5 pm, and Sunday from 12 pm to 5 pm. The library is 8,627 square feet and provides Wi-Fi services, a recycling site for e-waste, and laptop checkout services. The existing library will be replaced with a newly constructed approximately 26,000 square feet building located in Landmark Square. The new library will include a multi-use community room, quiet rooms, and a dedicated teen room, as well as an anticipated outdoor seating area. Construction is anticipated to be complete by 2027. As discussed in Section 4.11, *Population and Housing*, development facilitated by the project would potentially increase Clovis's population from 129,121 to 133,761 persons, a 3.6 percent increase of the City's 2024 population. Given that not all new residents would visit the library frequently, the increase in monthly visitation would be lower than 3.6 percent, which would be statistically insignificant. Therefore, project impacts to public facilities (libraries) would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 1d:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?
Threshold 2:	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?
Threshold 3:	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

IMPACT PSR-5 DEVELOPMENT UNDER THE PROJECT WOULD INCREMENTALLY INCREASE THE CITY'S POPULATION AND INCREASE THE USE OF EXISTING PARKS AND RECREATIONAL FACILITIES AND REDUCE THE CITY'S PARKLAND TO POPULATION RATIO. HOWEVER, IMPACTS RELATED TO THE PHYSICAL DETERIORATION OF PARKLAND OR RECREATIONAL FACILITIES, AND THE NEED TO CONSTRUCT NEW FACILITIES WOULD BE LESS THAN SIGNIFICANT.

The project would facilitate an increase of up to 3,662 residents, resulting in a potential increase in the use of parks and recreational facilities throughout Clovis. The city currently has 285 acres of parkland, with a parkland to population ratio of 2.2 acres per 1,000 residents, in addition to access to CUSD recreational facilities after school hours. While the project would not directly introduce

development, future development associated with the project would result in an increase in the City population to 133,760 residents and a parkland ratio of 2.13 acres per 1,000 residents. The current and projected population to parkland ratio is far below the State recommendation of 5.0 acres of parkland per 1,000 residents. The City of Clovis would not be able to achieve this goal as the City is made up primarily of agricultural and residential uses and lacks the amount of undeveloped land the City would need to be developed into parkland to meet the goal.

As future residential development projects are approved, parkland in-lieu fees (pursuant to the Quimby Act) would be required by the Clovis Municipal Code Section 3.4.03 as part of the individual projects. Funding for maintenance of new and existing facilities is provided through property assessments and taxes. Park and recreational facility maintenance and acquisition needs in the city are evaluated with respect to population growth, locational needs, and budget. The project would not preclude implementation or expansion of any parkland, trails, or recreation facility.

Any project associated with new or expanding parkland or recreation facilities would be subject to project-specific environmental review and mitigation pursuant to CEQA and pay any required recreational impact fee to pay for new parks. While the project would increase the number of people visiting parks and recreational facilities, the incremental increase across the city would not result in the need to construct new or expanded facilities beyond what was planned for in the Clovis General Plan. Therefore, the project would result in less than significant substantial physical deterioration of existing parkland or substantial adverse physical impacts associated with the provision of new or physically altered parkland.

Mitigation Measures

No mitigation measures are required.

4.12.4 Cumulative Impacts

Fire Protection

Cumulative development would increase the population such that there is an increase in reported incidents, leading to longer response times unless the Fire Department increases staffing. As described above under Impact PSR-1, with continued implementation of General Plan policies and Fire Code requirements, it is not anticipated that a new fire station beyond what is planned for is needed to serve cumulative development in Clovis. Because the project would not exceed the projected population growth planned for in the General Plan, the project would not have a cumulatively considerable impact on city fire protection. Therefore, the cumulative impacts related to fire protection facilities would be less than significant, and the project's contribution to these impacts would not be cumulatively considerable.

Police Protection

Cumulative development would increase population such that there would be an increase in reported incidents leading to longer response times. Overall, although additional staffing may be needed in the future, this project's impact on police protection would not be cumulatively considerable since the project would not exceed the projected population growth planned for in the General Plan and associated increase in police services to meet that demand or result in the need for more facilities to be built. Therefore, the cumulative impacts related to police facilities would be less than significant, and the proposed project's contribution to these impacts would not be cumulatively considerable.

Schools

Cumulative development would increase the number of children attending CUSD schools. CUSD is currently over capacity for elementary, middle, high, and SDC schools, and project implementation would add to this facility shortage. However, to offset the project's potential impact to schools, the CUSD implements developer fees which reduce potential student impacts from development activity. Furthermore, compliance with Senate Bill 50 would require future development in Clovis to pay school impact fees established to offset potential impacts from new development. Additionally, the increase in population associated with the project would only increase the existing population by 3.6 percent, which would not result in the need for the expansion of existing schools or the development of new schools that have not already been accounted for by CUSD and General Plan population projections. CUSD also plans to open a new education center which would provide additional space for middle and high schools. The project itself would not have a significant impact, however, due to the contribution to middle and high schools in Clovis that are already over capacity, the project's contribution to this impact would be cumulatively considerable.

Parks and Recreational Facilities

Cumulative development would increase demand for park and recreational facilities. As described in Impact PSR-5 above, the project would increase the population of Clovis thereby reducing the ratio of parkland within the city limits to parkland ratio to approximately 2.13 acres per 1,000 residents, which is below the State recommendation of five acres of parkland per 1,000 people. However, new development projects would have to adhere to Clovis Municipal Code Section 3.4.03 which requires development to provide Quimby parkland in-lieu fees and park improvement impact fees, which would ensure any cumulative significant impacts to park and recreational facilities would be reduced to less than significant. Recreational facilities such as libraries would potentially see an increase in visitations due to the cumulative development associated with the project; however, given that the project would only increase the population by 3.6 percent and not all new residents would utilize the library, the project would not have a considerable impact on the existing facility. Future growth and demand for parks and recreational facilities associated with the project would also not exceed the projected population growth planned for in the City of Clovis General Plan, and therefore, cumulative impacts related to new or expanded park and recreation facilities, or the physical deterioration of existing park and recreation facilities, would be less than significant. The project would not have a cumulatively considerable contribution to a significant cumulative impact regarding park and recreation facilities.

Mitigation Measures

No mitigation measures are required.

4.13 Transportation

This section analyzes impacts related to transportation associated with development facilitated by the Infill Rezone Program project.

4.13.1 Setting

This section describes the existing roadway, transit, bicycle and pedestrian components of the Clovis transportation system.

a. Roadway System

The network of roadways in and around Clovis consists of highways, arterials, collectors and local streets. Figure 4.13-1 presents the existing General Plan Circulation Diagram and the roadway classifications in the city.

Highways

State Route (SR) 168 is a divided four-lane highway running northeast to southwest through the city. It provides a connection from the intercity Fresno area to the Sierra Nevada Mountain range. Access points to SR 168 within Clovis are located at Shaw Avenue, Bullard Avenue, Herndon Avenue, Fowler Avenue, Temperance Avenue, Owens Mountain Parkway and Shepherd Avenue. Most sections of SR 168 in the city have limited access but sections near Owens Mountain Parkway and Shepherd Avenue have at-grade intersections. The speed limit is generally set at 65 mph within the city.

Arterials

Clovis's arterial streets are the primary movers of traffic and provide a high level of mobility between freeways, expressways, other arterials, and collector roadways. Arterials are designed to move large volumes of traffic and provide connections between major residential, employment, and activity centers. Arterial streets typically have more right-of-way and a higher degree of access control than collector roadways. Most arterials in Clovis have four travel lanes, and opposing traffic may be separated by a median.

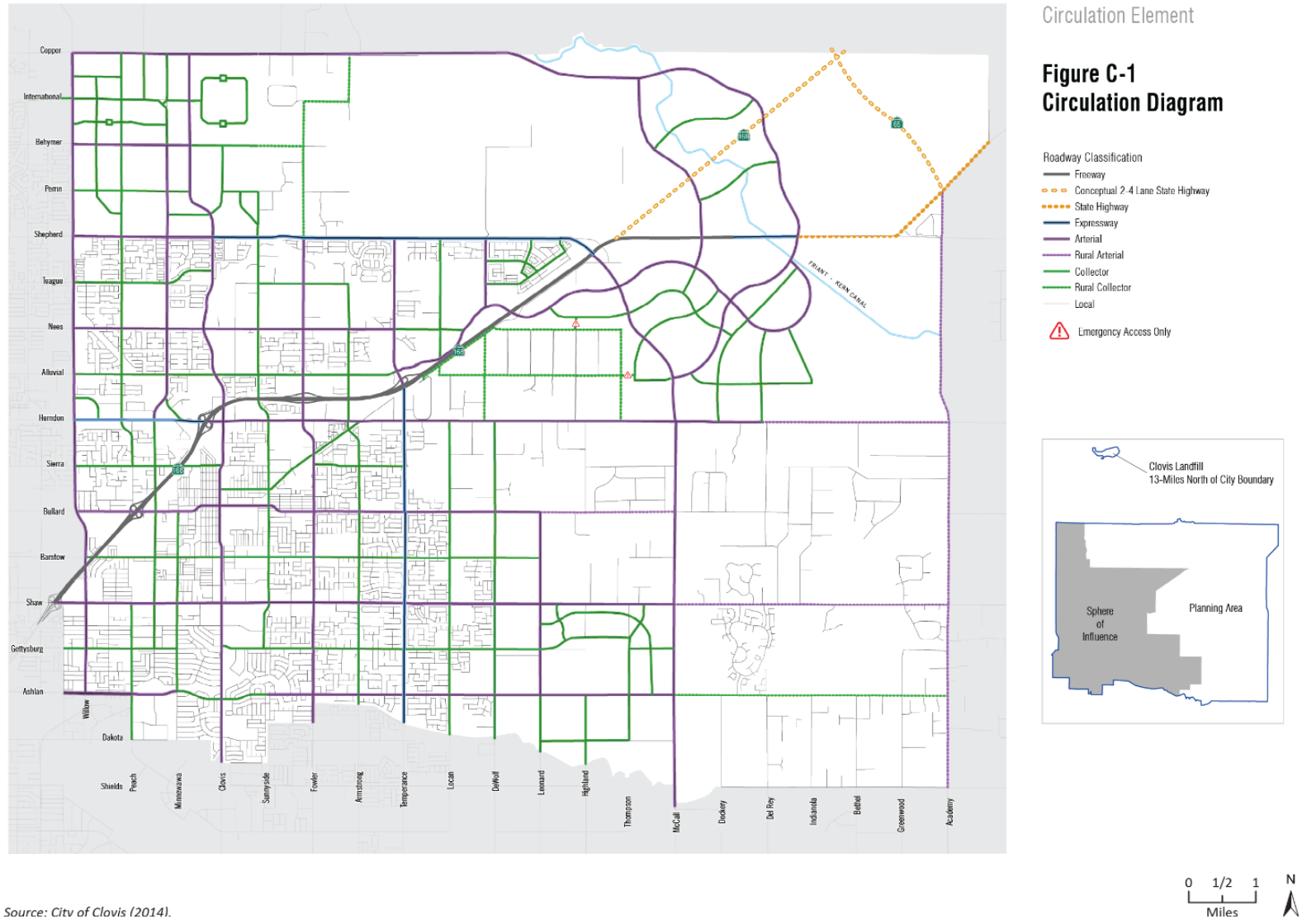
Collectors

Collector streets provide for relatively short distance travel between and within neighborhoods and are not designed to handle long-distance through-traffic. Driveway access to collectors is less restricted than on arterials. Speed limits on these streets are typically lower than those found on arterials. Collector streets differ from local streets in their ability to handle through traffic movements between arterials.

Local Streets

The remainder of Clovis’s roadways are considered local streets that are designed to provide direct roadway access to abutting land uses and serve short distance trips within neighborhoods. Traffic volumes and speed limits on local streets are low, and these roadways have no more than two travel lanes.

Figure 4.13-1 Existing General Plan Circulation Diagram



Source: City of Clovis (2014).

Source: Clovis General Plan (2014)

b. Transit Service

This section summarizes current and proposed public transit services that connect destinations within the City of Clovis as well as around the region. This section includes a review of bus and passenger rail transit facilities.

Public Bus Transit

Public bus transit in the city is provided by Clovis Transit and Fresno Area Express (FAX). The William H. "Harry" Armstrong Transit Center, located at 785 Third Street, which opened in 2024, serves as the primary local and regional transit hub.

Local Transit Service

Clovis Transit provides local fixed-route service via a door-to-door paratransit service for eligible passengers with disabilities, offering free public transportation within Clovis. These services help connect residents to key destinations in Clovis, Tarpey, and parts of Fresno. All Clovis Transit buses are equipped with mounted bike racks that accommodate two bicycles.

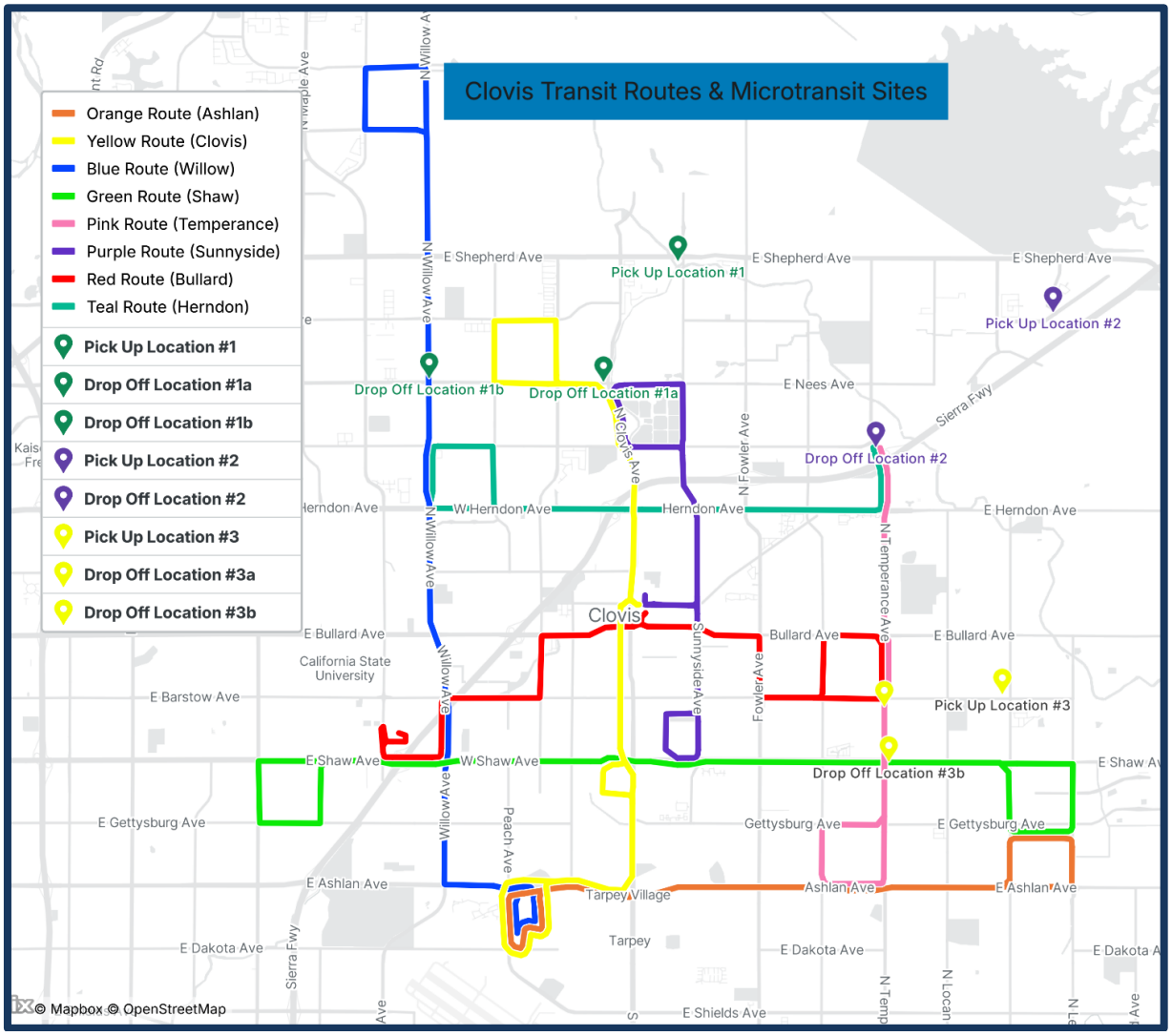
The fixed-route service encompasses eight color-coded routes in Clovis as shown in Table 4.13-1 and Figure 4.13-2. The new routes run east/west and north/south on 30-minute headways, with multiple transfer points designed to enhance efficiency and reliability of service. The routes provide vital connections to key destinations, including educational institutions (such as high schools and colleges), medical facilities, social services, recreational centers - including the Clovis Senior Activity Center- and a variety of shopping locations. Additionally, a complementary microtransit service is available for passengers in outlying communities, facilitating their connection to the fixed-route system. Microtransit rides can be booked from three microtransit stops - located at the Dry Creek Trailhead, Harlan Ranch Park, and Pasa Tiempo Park - to designated bus stops.

Table 4.13-1 Clovis Transit Routes

Route/Service	Operating Hours	Frequency	Days Provided
Green Route (Shaw Avenue)	6:00 AM – 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No service	No service	Sunday
Orange Route (Ashlan Avenue)	6:00 AM – 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	60 minutes	Saturday
	No service	No service	Sunday
Red Route (Bullard Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Teal Route (Herndon Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Pink Route (Temperance Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Purple Route (Sunnyside Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Yellow Route (Clovis Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Blue Route (Willow Avenue)	6:00 AM - 7:00 PM	30 minutes	Monday - Friday
	7:30 AM - 3:30 PM	30 minutes	Saturday
	No Service	No Service	Sunday
Microtransit Sites	6:00 AM - 7:00 PM	Per Request	Monday - Friday
	7:30 AM - 3:30 PM	Per Request	Saturday
	No Service	No Service	Sunday

Source: Clovis Transit and Fresno Area Express, (2025).

Figure 4.13-2 Clovis Transit Routes



Regional Transit Service

The FAX routes are operated by the City of Fresno Transportation Department, providing public transit services throughout Fresno and extending into the City of Clovis as part of the broader Fresno-Clovis metropolitan area. Currently, several FAX routes serve Clovis, including Route 9 (Shaw), which runs along Shaw Avenue with stops like Sierra Vista Mall, and Route 28 (Ventura-Kings Canyon), which connects downtown Fresno to the Fresno County Department of Social Services (DSS) on Peach and Dakota. This site serves as a transfer point for FAX and Clovis Transit.

- **FAX Route 9 (Shaw Avenue):** Connects Clovis to major destinations along Shaw Avenue, including Fashion Fair Mall, Fresno State University, and the River Park shopping area. Service operates on weekdays from 5:50 AM to 11:51 PM, and on Saturdays from 6:35 AM to 11:51 PM and Sundays from 6:35 AM to 7:03 PM.
- **FAX Route 28 (Ashlan Avenue):** Provides service along Ashlan Avenue, connecting Clovis residents to areas in Fresno, including Manchester Center and western Fresno neighborhoods. Route 28 runs weekdays, typically from around 5:37 AM to 11:56 PM, and on Saturdays from

6:40 AM to 11:55 PM, and Sundays from 6:40 AM to 7:03 PM, with buses departing every 30 minutes from Manchester Transit Center to areas near Clovis Avenue.

All FAX buses are equipped with front-mounted bike racks that accommodate two bicycles.

Passenger Rail Service

While Clovis does not currently have a dedicated passenger rail station, residents can access rail services through the Fresno Amtrak Station. The Fresno Amtrak Station (approximately nine miles from Downtown Clovis) is served by the Amtrak San Joaquin route, providing connections between Bakersfield and Oakland/Sacramento. An Amtrak Thruway motorcoach connection in Bakersfield offers service to the Los Angeles metropolitan area.

The City of Fresno is also a designated station along the future California High Speed Rail system, which will connect San Francisco to Los Angeles via the Central Valley. The planned Fresno station, located in downtown Fresno (about 10 miles from Downtown Clovis), will enhance regional connectivity for Clovis residents, offering high-speed transit options within the state. Future expansions of regional rail services, such as the Altamont Corridor Express (ACE) extension to Merced, may further improve rail connectivity for Clovis commuters.

c. Bicycle Facilities

This section describes the bicycle circulation system in the City of Clovis. Caltrans classifies and defines bicycle facilities. Caltrans designates four classes of bicycle facilities: Classes I, II, III, and IV. Figure 4.13-3 illustrates and describes the bicycle facility classifications.

Figure 4.13-4 displays the existing and proposed bike facilities throughout Clovis. The city provides several types of bike facilities such as trails, paseos, bike lanes, and bicycle wayfinding/signage. The existing bike network includes 59 miles of Class II bike lanes, primarily located on major arterials and collectors in the city. Off-street bicycle facilities include trails (Old Town Trail, Dry Creek Trail, Enterprise Trail, and Sierra Gateway Trail), paseos, and sidewalks. The city has 12.5 miles of off-street trails and paseos.

The Clovis Active Transportation Plan (ATP)[1] proposed an additional 130 miles of bicycle network comprised of different bicycle facilities to be added to the existing network. In addition to bicycle lanes and trails, the proposed network also includes Neighborhood Greenways. These are sometimes referred to as “Bicycle Boulevards,” which are local streets designated and designed to prioritize bicycle use.

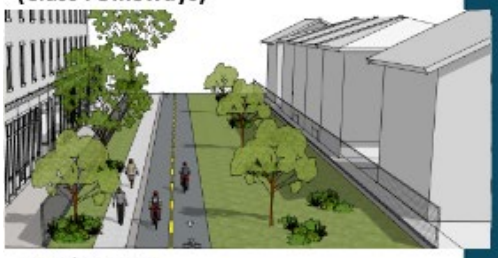
The city has made progress in expanding its bike network (see Figure 4.13-4); however, many of these facilities are on roadways with high traffic volumes and posted speeds greater than 40 mph. The Multi-Jurisdictional Local Road Safety Plan (LRSP)[2] noted that bicyclists account for three percent of total reported collisions but nine percent of fatal and severe injury collisions. As such, the LRSP presented the following recommendations to improve bicycle safety within the City of Clovis:

- Install bike lanes,
- Install bike lane extensions through intersections, and
- Install bike boxes.

[1] Clovis Active Transportation Plan. 2023. Accessible at: https://www.clovisca.gov/services/planning_development/engineering/active_transportation_plan/index.php
[2] Multijurisdictional Local Road Safety Plan.2022. Accessible at: https://www.fresnocog.org/wp-content/uploads/2022/06/26012_Fresno-COG-MLRSP_Report-FINAL-April-update_Part1-1.pdf

Figure 4.13-3 Types of Bicycle Facilities

Multi-Use Paths (Class I Bikeways)



A path physically separated from motor vehicle traffic by an open space or barrier, used by bicyclists, pedestrians, joggers, skaters, and other non-motorized travelers.
Because the availability of uninterrupted rights-of-way is limited, this type of facilities may be difficult to locate and expensive to build relative to other types of bicycle and pedestrian facilities, but inexpensive compared to new roadways. Prime locations for bike paths are areas such as power-line easements, utility easements, canal banks, river levees, drainage easements, railroad or highway rights-of-way, or regional community parks.

Bicycle Lanes (Class II Bikeways)



A travel lane on a roadway that has been set aside by striping and pavement markings for the preferential or exclusive use of bicyclists. Bicycle lanes are intended to promote an orderly flow of bicycle and motor vehicle traffic. This type of facility is established by using the appropriate striping, legends, and signs.

Bicycle Routes (Class III Bikeways)



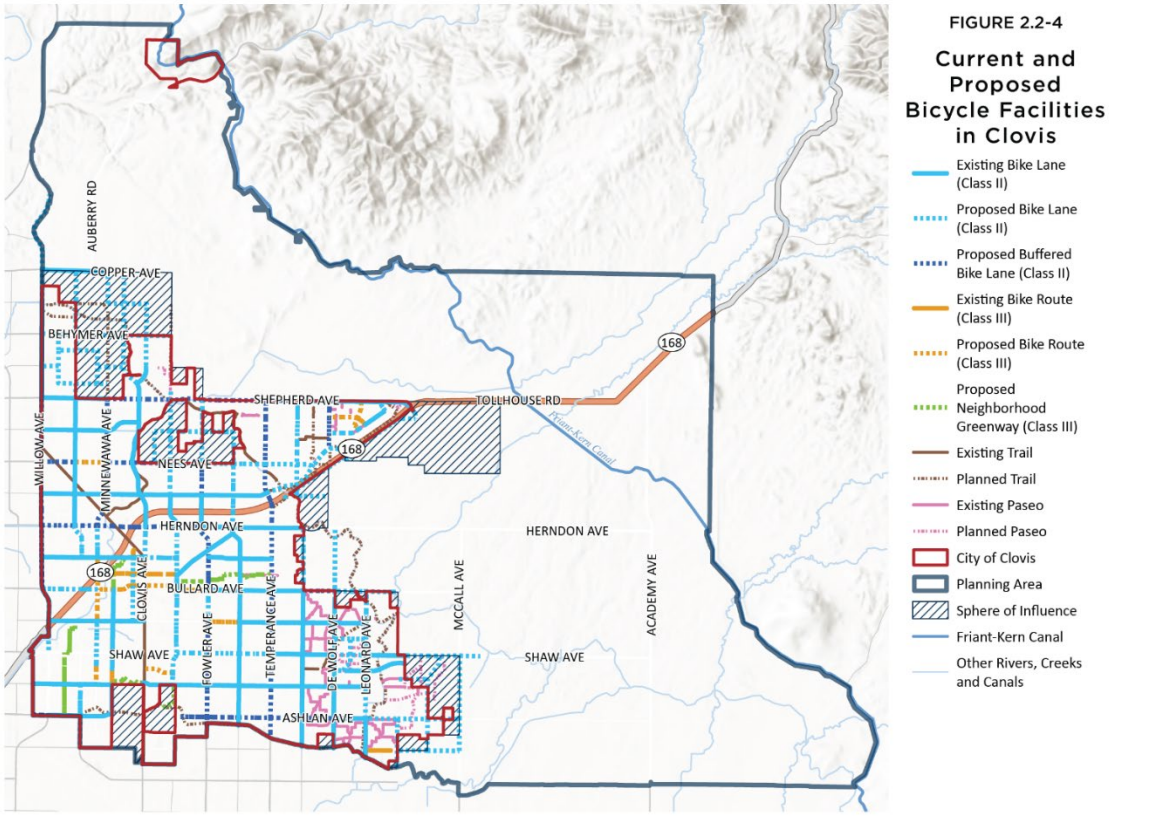
Bicycle routes designated by signage where bicyclists share travel lanes with motor vehicle traffic. Bicycle routes must be of benefit to the bicyclists and offer a higher degree of service than adjacent streets. Class III bikeways are often designated on low-volume local residential streets. Additionally, many cities have installed an enhanced type of Class III Bicycle Route, referred to as a "Bicycle Boulevard." Bicycle Boulevards are generally installed on relatively low-volume streets and often include elements to facilitate bicycle travel, such as reorienting stop signs to reduce delays to cyclists, and/or through the inclusion of traffic calming measures.

Separated Bikeway (Class IV Bikeways)



A class IV bikeway is for the exclusive use of bicycles and includes a separation between the bikeways and adjacent vehicle traffic. The physical separation may include flexible posts, grade separation, inflexible physical barriers or on-street parking. Separated bikeways generally operate in the same direction as vehicle traffic on the same side of the roadway. However, two-way separation bikeways can also be used, usually in lower speed environments (35 miles per hour or less).

Figure 4.13-4 Existing and Proposed Bicycle Facilities



ırce: City of Clovis Active Transportation Plan (1/24/25).

d. Pedestrian Facilities

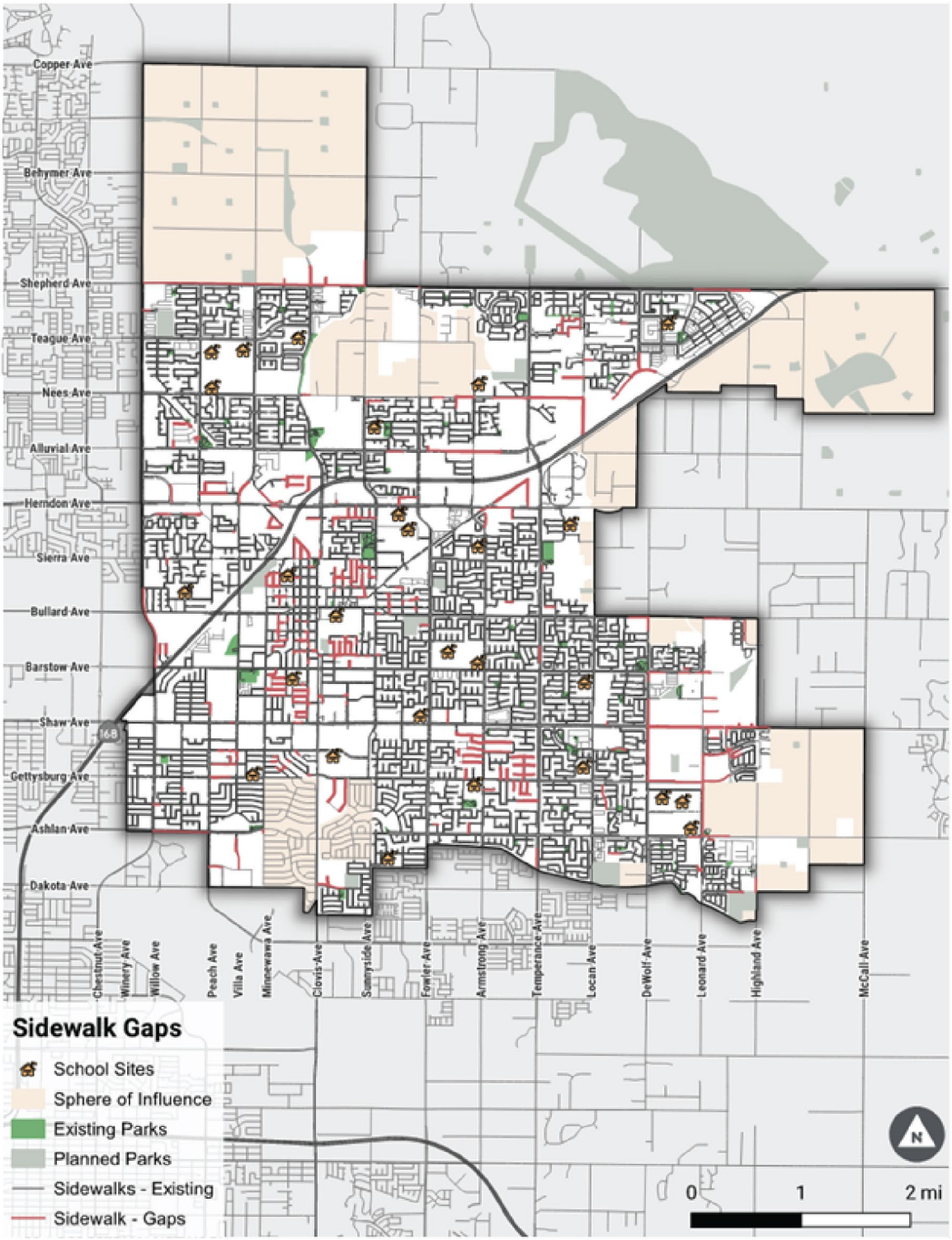
Sidewalks are generally included on most roadways within the city, providing pedestrian access to residential, commercial, employment and school areas. Locations in the city where sidewalk infill is needed are primarily located in southwest and southeast Clovis. Figure 4.13-5 shows the locations of existing and missing sidewalks identified in the Clovis ATP.

The City of Clovis ATP noted that pedestrian connectivity would be improved by installing additional pedestrian crossings along arterials, where currently people have to walk more than a quarter mile to cross the street at a marked crosswalk. In addition to the lack of high-visibility crosswalks along arterials, there is a lack of infrastructure (i.e., advance stop bars and median refuge islands) that limit safe pedestrian mobility at signalized and unsignalized intersections.

Trails and Paseos

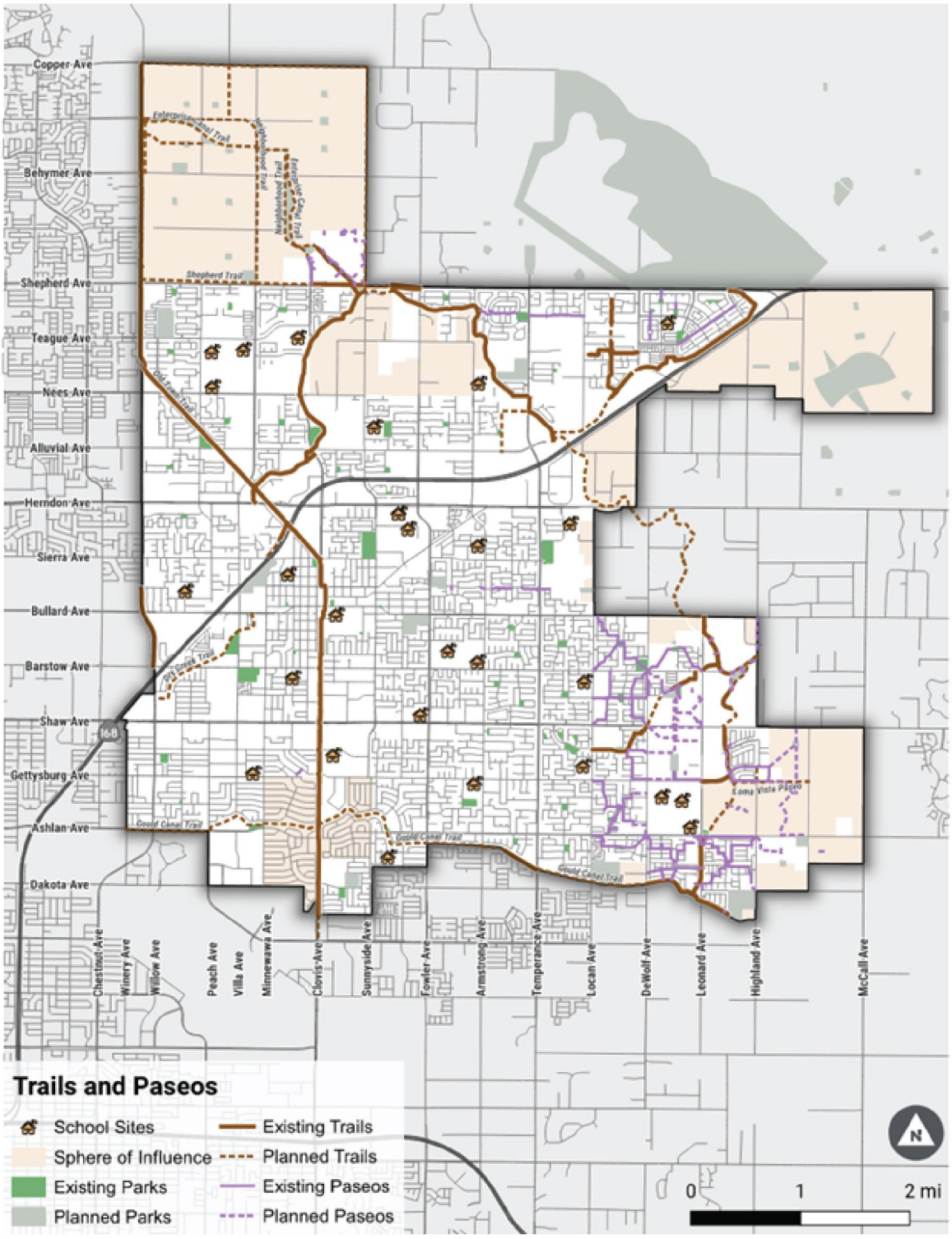
Trails and paseos are important to both the bicycle and pedestrian networks, since they provide an off-street travel option through tree-lined linear parks. The existing and planned trails and paseos are shown in Figure 4.13-6. The City of Clovis is dedicated to expanding its trail and paseo networks to provide more opportunities for the public. The city is partnering with the Fresno Irrigation District to allow people to walk along irrigation canals. The city has also identified potential locations to install mid-block crossings to increase trail connectivity throughout the city.

Figure 4.13-5 Critical Gaps in Sidewalk System



Source: City of Clovis Active Transportation Plan (2023).

Figure 4.13-6 Existing and Planned Trails and Paseos



Source: City of Clovis Active Transportation Plan (2023).

4.13.2 Regulatory Setting

The General Plan, along with a variety of City, regional, State, and Federal plans, legislation, and policy directives provide guidelines for the safe operation of streets and transportation facilities in Clovis. While the City has primary responsibility for the maintenance and operation of local transportation facilities in its jurisdiction, Clovis staff works on a continual basis with responsible regional, State, and Federal agencies including County of Fresno, the Fresno Council of Governments, the California Department of Transportation (Caltrans), the Federal Highway Administration, and others to maintain, improve, and balance the competing transportation needs of the community and the region.

a. Federal Regulations

Federal Highway Administration

The Federal Highway Administration (FHWA) is the agency of the United States (US) Department of Transportation (DOT) responsible for the federally funded roadway system, including the interstate highway network and portions of the primary state highway network, such as SR 168 and SR 41.

Federal Transit Administration

The Federal Transit Administration (FTA) is an authority that provides financial and technical assistance to local public transit systems, including buses, subways, light rail, commuter rail, trolleys, and ferries. The FTA is funded by Title 49 of the United States Code, which states the FTA's interest in fostering the development and revitalization of public transportation systems.

b. State Regulations

Senate Bill 743

Senate Bill (SB) 743, passed in 2013, resulted in several statewide California Environmental Quality Act (CEQA) changes. It required the California Governor's Office of Planning and Research (OPR) to establish new metrics for determining the significance of transportation impacts of projects within transit priority areas (TPAs) and allows OPR to extend use of the metrics beyond TPAs. OPR selected vehicle miles traveled (VMT) as the preferred transportation impact metric and applied their discretion to require its use statewide. This legislation also established that aesthetic and parking effects of residential, mixed-use residential, or employment center projects on an infill site within a TPA are not significant impacts on the environment. The revised CEQA Guidelines that implement this legislation became effective on December 28, 2018, and state that vehicle level of service (LOS) and similar measures related to vehicle delay shall not be used as the sole basis for determining the significance of transportation impacts for land use projects, and that as of July 1, 2020, this requirement shall apply statewide.

The OPR "Technical Advisory on Evaluating Transportation Impacts in CEQA" (December 2018) includes specifications for VMT methodology and recommendations for significance thresholds, screening of projects that may be presumed to have less than significant impacts, and mitigation.

Screening criteria include:

- **Small projects:** The Technical Advisory concludes that, absent any information to the contrary, projects that generate 110 trips per day or less may be assumed to cause a less-than-significant transportation impact.
- **Projects near transit stations:** Projects located within ½ mile of an "existing major transit stop" or an "existing stop along a high-quality transit corridor" would have a less-than-significant impact on VMT.
- **Affordable residential development:** Projects consisting of a high percentage of affordable housing may be assumed to cause a less-than-significant transportation impact on VMT because they may improve jobs-housing balance and/or otherwise generate less VMT than market-based units.
- **Redevelopment projects:** If a proposed redevelopment project leads to a net overall decrease in VMT (when compared against the VMT of the existing land uses), the project would lead to a less-than-significant transportation impact.
- **Local-serving retail:** Trip lengths may be shortened and VMT reduced by adding "local-serving" retail opportunities that improve retail destination proximity. Page 17 of the Technical Advisory generally describes retail development including stores less than 50,000 square feet as local-serving. In May 2020, OPR staff indicated during online webinars that any retail building that is 50,000 square feet or less may be considered local-serving.

Other key guidance includes:

- VMT is the most appropriate metric to evaluate a project's transportation impact.
- OPR recommends tour- and trip-based travel models to estimate VMT, but ultimately defers to local agencies to determine the appropriate tools.
- OPR recommends measuring VMT for residential and office projects on a "per rate" basis. Specifically, OPR recommends VMT per capita for residential projects and VMT per employee for office projects.
- OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold.[3] In other words, an office project that generates VMT per employee that is more than 85 percent of the regional VMT per employee could result in a significant impact. OPR notes that this threshold is supported by evidence that connects this level of reduction to the State's emissions goals (pages 10-11).
- For retail projects, OPR recommends measuring the net decrease or increase in VMT in the planning area with and without the project. The recommended impact threshold is any increase in total VMT.
- Lead agencies ultimately have the discretion to set or apply their own significance thresholds, provided they are based on significant evidence.
- Cities and counties still have the ability to use measures of delay such as LOS for other plans, studies, or network monitoring. However, according to CEQA section 15064.3, Determining the Significance of Transportation Impacts, "effect on automobile delay shall not constitute a significant environmental impact."

[3] Governor's Office of Planning and Research. (2018). *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Sacramento, CA: State of California. Accessible at: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Caltrans Vehicle Miles Traveled-Focused Transportation Impact Study Guide

The Caltrans "Vehicle Miles Traveled-Focused Transportation Impact Study Guide" (TISG), dated May 20, 2020, was prepared to provide guidance to Caltrans districts, lead agencies, tribal governments, developers, and consultants regarding Caltrans' review of VMT impact analysis for land use projects and land use plans. Caltrans seeks to reduce single occupancy vehicle trips, provide a safe transportation system, reduce per capita VMT, increase accessibility to destinations via cycling, walking, carpooling, and transit, and reduce greenhouse gas (GHG) emissions. The TISG notes that, for land use projects and plans, automobile delay is no longer considered a significant impact on the environment under CEQA. Caltrans' primary review focus for a land use project's transportation impacts is now VMT. The TISG generally endorses the OPR "Technical Advisory," including the thresholds in that document. Caltrans may review VMT thresholds, methodology, and mitigations.

Caltrans Interim Land Development and Intergovernmental Review (LDIGR) Safety Review Practitioners Guidance

The Interim LDIGR Safety Review Practitioners Guidance (July 2020) was developed to provide immediate direction about the safety review while final guidance is being developed. This interim guidance does not establish thresholds of significance for determining safety impacts under CEQA. The guidance notes that the significance of impacts should be determined with careful judgment on the part of a public agency and based, to the greatest extent possible, on scientific and factual data consistent with Caltrans' CEQA guidance contained in Caltrans' Standard Environmental Reference. The guidance notes that Caltrans traffic safety staff will use available data to determine if the proposed project may influence or contribute to locations identified by traffic safety Investigations generated by network screening or initiated by Caltrans.

c. Regional Regulations

Fresno Council of Governments Regional Transportation Plan and Sustainable Community Strategy

The Fresno County Council of Governments (Fresno COG) is a voluntary association of local governments and a regional planning agency comprised of 16 member jurisdictions, including the City of Clovis. The Fresno COG's purpose is to establish a consensus on the needs of the Fresno County area and further action plans for issues related to the Fresno County region. The current Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS) produced by Fresno COG was adopted in 2022. The RTP/SCS sets forth regional transportation policy and provides capital program planning for all regional, state, and federally funded projects. The RTP addresses GHG emission reductions and other air emissions related to transportation, with the goal of preparing for future growth in a sustainable way. The plan specifies how funding will be sourced and financed for the region's planned transportation investments, ongoing operations, and maintenance.

Fresno County Transportation Authority and Measure C.

The Fresno County Transportation Authority (FCTA) is a regional agency that was created to administer the voter-passed Measure C program in 1986. Measure C was a 20-year program that achieved a half-cent sales tax for transportation expenditures and infrastructure. After its 20-year duration, the program was extended for another 20 years in 2006 and named the Measure C

Extension Expenditure Plan. Through this funding, the FCTA established goals and core values for utilizing these funds for not only building roads but also completion of added bike lanes; expansion of Fresno and Clovis transit; and support for transit, ridesharing, and vanpools.

Fresno County Congestion Management Process

As the designated Congestion Management Agency (CMA) for Fresno County, Fresno COG is responsible for updating the County's Congestion Management Process (CMP) and monitoring its implementation. The Fresno County CMP identifies four general objectives: (1) optimize the transportation facilities through efficient system management; (2) invest in strategies that reduce travel demand, improve system performance, increase safety, and provide effective incident management; (3) reduce VMT by encouraging alternative modes of transportation and promotion of sustainable land use development; and (4) improve public transit, extend bicycle and pedestrian systems, and promote car-sharing and bike-sharing programs to facilitate the development of an integrated multi-modal transportation system in the Fresno region.

d. Local Regulations

Clovis General Plan

The City of Clovis adopted a comprehensive General Plan Update on August 28, 2014 and a General Plan Amendment to the Circulation Element in 2022 to address statewide transportation planning requirements. The amended General Plan Circulation Element includes the following goals:

1. A context-sensitive and "complete streets" transportation network that prioritizes effective connectivity and accommodates a comprehensive range of mobility needs.
2. A roadway network that is well planned, funded, and maintained.
3. A multimodal transportation network that is safe and comfortable in the context of adjacent neighborhoods.
4. A well-planned and maintained pedestrian circulation network that promotes increased use of the City's bicycle, and transit, and pedestrian facilities in order to reduce commuting by single-occupancy vehicles whenever possible.
5. A complete system of trails and pathways accessible to all residents focusing on connectivity between adjacent neighborhoods, parks, trails, and goods and services.
6. Safe and efficient goods movement with minimal impacts on local roads and neighborhoods.
7. A regional transportation system that connects Clovis to the San Joaquin Valley region.
8. Improve and enhance the circulation network in a manner that reduces VMT through improved connectivity by focusing on modes of transportation that promotes the reduction in the use of single-occupancy vehicles whenever possible.

Clovis Transportation Impact Analysis Guidelines

The City of Clovis adopted guidelines for transportation impact analysis in July 2020. The Transportation Impact Analysis (TIA) Guidelines document provides guidance to City of Clovis staff, applicants, and consultants on the requirements to evaluate transportation impacts for projects in the city for the purpose of determining impacts under CEQA. It provides guidance for the two types of analysis that normally comprise a TIA report (1) CEQA Analysis, and (2) Local Transportation Analysis.

For the CEQA VMT analysis, the TIA guidelines define the quantitative methodology, significance thresholds, and mitigation measures for conducting the transportation analysis in accordance with the requirements of SB 743 primarily based on VMT metrics. For land development projects, VMT per capita or VMT per employee are used to determine impacts. The guidelines document defines specific methodologies, criteria and thresholds for several project types, and discusses potential mitigation measures that can be considered to reduce VMT.

Clovis Active Transportation Plan

The 2022 ATP defines a clear vision for the city's active transportation network and proposes a framework for implementing projects, programs, and policies to turn the vision into a reality. The ATP identifies strategies to improve safety and accessibility for active forms of travel such as walking and bicycling. It supplements other long-range plans and will help the City create a sustainable and multi-modal transportation network.

The ATP includes the following goals.

1. Improve the safety of people walking and bicycling.
2. Develop a well-connected network of trails, walkways, and bikeways.
3. Create a network that allows people of all socioeconomic circumstances the ability to travel safely throughout the city without a car.
4. Increase access to recreation by providing access to trails, walkways, and bikeways.
5. Increase the share of people who walk or ride a bicycle to get to work, school, shopping, and other activities

The ATP includes a list of project recommendations with specific locations, facility types and priority for implementation to improve walking and bicycling infrastructure throughout Clovis.

Fresno-Clovis Metropolitan Area Transit Short Range Transit Plan (SRTP)

The Fresno-Clovis Metropolitan Area (FCMA) SRTP was adopted on June 29, 2023. It presents a bi-annual short-term operational, financial, and capital improvements plan for two transit providers: FAX and Clovis Transit. The purpose of the SRTP is to promote a comprehensive, coordinated, and continuous planning process for transit service in the FCMA over the planning horizon.

4.13.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The analysis assesses how the city's transportation system would operate with the implementation of the project. The potential impacts were identified based on a set of significance criteria based on the 2025 CEQA Guidelines. This section describes assumptions and methods used to assess potential impacts on the transportation system.

Vehicle Miles Traveled

VMT is determined by multiplying the number of vehicular trips by the trip distance in miles. For example, one vehicle that travels 10 miles in a day generates 10 VMT. For the purposes of this

analysis, VMT is expressed on a daily basis for a typical weekday. VMT values in this analysis represent the full length of a given trip and are not truncated at jurisdiction boundaries. Additionally, these VMT values are for trips beginning or ending in the city (i.e., are associated with land uses within Clovis). Trips passing through the city without stopping are not included in these VMT estimates, as the city has little or no control over such trips.

Although the absolute amount of VMT may be reported, transportation impact analysis is typically based on VMT expressed as an efficiency metric. VMT efficiency metrics, such as VMT per resident and VMT per employee, allow the VMT performance of different land use quantities to be compared. Such metrics provide a measure of travel efficiency and help depict whether people are traveling by vehicle more or less over time, across different areas, or across different planning scenarios. A per-capita or per-employee decline in VMT compared to a baseline condition indicates that the land use patterns and transportation network are operating more efficiently.

Two measures of VMT are used in this analysis:

- VMT per capita for residential land uses. Includes VMT for all trips produced by a dwelling unit's residents, such as to work, school, or shop, on a typical weekday.
- VMT per employee for non-residential land uses. Includes trips made by employees at the non-residential land use on a typical weekday, not including visitors to the non-residential land use such as customers, patients, or deliveries.

Travel Demand Model

Forecasts of regional travel by various modes, regional average VMT per capita and VMT per employee values are determined using the Fresno COG regional travel model. The travel demand model is a set of mathematical procedures and equations that represent the variety of transportation choices that people make, and how those choices result in trips on the transportation network.

The Fresno COG regional travel model is an activity-based model that simulates the County's population, based on detailed Census data, and models the daily activity patterns of each simulated individual along with resulting travel demand. The daily activity patterns in the travel model are based on a statistical analysis of a household travel survey, where a representative sample of households were asked to track all daily activities and trips by all members of their household. A simulated travel tour might consist of, for example, travel from the home to the gym to work to supermarket to home in a typical weekday. The travel model was calibrated to these surveyed travel patterns, and also validated by its ability to replicate counted traffic volumes, transit ridership, and total Fresno County VMT from the Highway Performance Measurement System (HPMS) which is based on traffic counts.

The model presumes that future background travel options and behaviors remain similar to current conditions and does not explicitly account for potential changes associated with disruptive trends, emerging technologies, and changes in travel preferences. The model also does not assume a significant increase in working at home compared to 2019 baseline conditions.

Land Use

The Fresno travel model requires land uses to be defined for each geographic area in the county. The model defines land uses in micro-analysis zones (MAZs) which represent subareas of neighborhoods similar to Census blocks. The model also aggregates land uses to the more traditional transportation analysis zones (TAZs) which are typically bounded by major arterial or

collector streets and are generally closer to the scale of Census tracts. The model land use inputs include numbers of households and employees by employment category, as well as enrollment at schools.

The future land use forecasts are consistent with the current General Plan land use map, as are the Fresno COG RTP/SCS forecasts for the 2046 horizon year from the most current RTP/SCS adopted in 2022. Table 4.13-2 summarizes the effect of the project on population, number of households, and employment based on the assumed land uses for each modeled scenario.

Table 4.13-2 Clovis Sphere of Influence Land Use Summary

Land Use	2019 Baseline[1]	2019 Plus Project	2046 Cumulative with Project
Households	42,877	46,297	55,810
Population	144,067	154,195	182,576
Employment	36,537	36,537	44,568

[1] The 2019 land use inputs used by Fresno COG to establish VMT thresholds are 5 percent lower than the updated 2019 land use inputs used as a base for the project increment.

VMT Metrics and Thresholds

For land use plans such as specific plans, community plans, and general plan updates, consistent with OPR's recommendations, the city requires comparing the applicable VMT thresholds (such as VMT per capita and/or VMT per employee) under existing conditions with the applicable VMT metrics for the expected horizon year for the land use plan. If there is a net increase in the applicable VMT metrics under horizon year conditions, then the project will have a significant impact.

The VMT per capita includes all trips made by residents, including their trips while away from home, but does not include trips visiting residences (e.g., trips made by delivery vans). The regional average VMT per capita is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by Fresno County residents, and dividing by the county population.

The VMT per employee includes trips made by employees to and from their workplaces, including trips to and from points other than the employees' homes, but does not include visitors to the employment sites. The regional average VMT per employee is calculated by summing the vehicle mileage (excluding trips made by transit, bicycle or walking) for all trips made by Fresno County employees, and dividing by the total number of employees in the county.

Consistent with the City's TIA Guidelines, two measures of VMT are used in this analysis:

1. **VMT Per Capita.** Includes VMT for trips produced by a dwelling unit's residents, such as to work, school, or shop, and with one end of the trip at the home, on a typical weekday. This metric is normally used for residential land uses.
2. **VMT PER Employee.** Includes all trips with one end at the land use, including trips by both employees, customers, and deliveries, on a typical weekday. This metric is normally used for non-residential land uses.

For informational purposes the total VMT, which includes all trips with at least one end in the planning area on a typical weekday, was provided.

Significance Thresholds

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, an impact related to transportation would be significant if the proposed project would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities
2. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)
4. Result in inadequate emergency access

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

IMPACT T-1 THE PROJECT WOULD NOT CONFLICT WITH ADOPTED PLANS OR POLICIES ADDRESSING THE CIRCULATION SYSTEM, INCLUDING ROADWAY, TRANSIT, BICYCLE, AND PEDESTRIAN FACILITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The project would not conflict with adopted programs, plans, policies, or ordinances that address the circulation system, including transit, bicycle, and pedestrian facilities. The proposed Infill Rezone Program sites are served by the city's existing and planned transportation system. The General Plan incorporates future networks and policies related to supporting transit, bicycle, and pedestrians in the city and Sphere of Influence. These networks are consistent with regional and local planning efforts supporting these modes of travel. The additional housing would potentially add traffic to streets which could affect conflicts with bicycle and pedestrian movements. However, the Infill Rezone Program sites will be implemented consistently with city standards and polices, and therefore there will be no conflicts with adopted programs, plans or polices. Therefore, there would be a less than significant impact.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

IMPACT T- 2 IMPLEMENTATION OF THE PROJECT WOULD CONTRIBUTE TO VMT PER CAPITA INCREASING ABOVE THE REGIONAL IMPACT THRESHOLD. WITH MITIGATION, IMPACTS WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

Based on Appendix G of the CEQA Guidelines, the project could result in a significant transportation impact if it would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)(1), which states for land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact." CEQA Guidelines § 15064.3, subdivision (b)(4) states, "A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle

miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence."

For land use plans such as specific plans, community plans, and general plan updates, consistent with OPR's recommendations, the city requires comparing the applicable VMT thresholds (such as VMT per capita and/or VMT per employee) with the applicable VMT metrics for the expected horizon year for the land use plan. If there is a net increase in the applicable VMT metrics under horizon year conditions, then the project will have a significant impact.

VMT was calculated for the Clovis area including current city limits and the sphere of influence (SOI). Table 3 summarizes the total citywide VMT for the 2019 baseline, the applicable threshold, and the baseline VMT with the project. As shown in the table, conditions with the Infill Rezone Program project would result in decreased VMT per capita and slightly increased VMT per employee in comparison to the 2019 baseline condition in Clovis. Residential VMT per capita would decrease by 2.7 percent, from 16.1 to 15.7, but would still be above the regional impact threshold of 14.0. Non-residential VMT per employee would increase by 0.4 percent, from 24.6 to 24.7, and would still be above the regional impact threshold of 22.3.

Table 4.13-3 Vehicle-Miles of Traveled Results

Units	2019 Fresno County	2019 Clovis SOI	2019 Clovis SOI Plus Project
VMT Per Capita			
Population	1,010,400	144,067	154,195
Residential VMT	16,267,400	2,153,575	2,235,892
VMT per Capita	16.1	16.1	15.7
Impact Threshold	14.0	14.0	14.0
VMT Per Employee			
Employees	404,100	36,537	36,537
Employee VMT	10,345,340	900,158	901,600
VMT per Employee	25.6	24.6	24.7
Impact Threshold	22.3	22.3	22.3
Total VMT	**51,389,619**	**5,451,855**	**5,554,389**

Source: Kittelson & Associates, 2025, applying Fresno COG travel model.

As individual land use development projects are implemented, consistent with the Infill Rezone Program, a focused project-specific VMT analysis may determine if the VMT per capita or per employee for that individual project exceeds the impact threshold.

The General Plan includes goals and policies intended to reduce VMT. The overarching goal for the Circulation Element is "a comprehensive and well-maintained multimodal circulation system that provides for the safe and efficient movement of people and goods, as well as encourages reductions in Vehicle Miles Traveled (VMT) through well-planned pedestrian connections and improved connectivity." The following is a list of policies added to the Circulation Element that would promote a reduction in VMT:

- **Policy 2.6 Vehicle Miles Traveled.** Development projects shall comply with the City's Transportation Analysis Guidelines and provide the appropriate VMT mitigation measures as determined through the analysis.

- **Policy 2.7 VMT Mitigation Fee Program.** Evaluate the feasibility of a VMT mitigation fee program and explore opportunities for establishing an in-lieu mitigation fee to offset VMT impacts from development.
- **Policy 2.8 Partner with Local Agencies And Stakeholders.** Partner with other local and regional agencies and stakeholders to explore VMT mitigation measures at the regional scale.
- **Policy 8.1 Transportation Demand Management.** Develop Transportation Demand Management (TDM) measures that promote, enhance, and make available feasible alternative modes of transportation to residents, employees, and visitors.
- **Policy 8.2 Transit Routes.** As development occurs in the City's growth areas, continue to evaluate transit routes to determine the most efficient methods of transporting people between residential neighborhoods and goods and services.
- **Policy 8.3 Bicycle Lanes.** Partner with any local bicycle advocacy groups to improve the design, location, and functionality of bicycle lanes to encourage safe and efficient travel lanes.
- **Policy 8.4 Connectivity between residential and commercial.** Continue to explore opportunities for increased non-vehicular connectivity between new and existing residential development and commercial uses.
- **Policy 8.5 Community Outreach and Education.** Explore the feasibility of a community outreach and education program that promotes and highlights opportunities for safe and efficient non-vehicular modes of transportation for commuting and recreation.
- **Policy 8.6 Employer Commute Programs.** Work with businesses to encourage commuter programs and infrastructure that promotes alternative modes of transportation reducing the use of single-occupancy vehicles, such as additional bicycle racks/lockers, on-site shower facilities, and perks for employees who commute.

Implementing the goals and policies presented above are intended to promote accessibility, encourage non-vehicle transportation modes, expand transit services, and develop TDM program requirements that reduce VMT associated with new development. When implemented, these types of policies can influence social behaviors by presenting a resident/employee with more transportation choices. The more times non-motorized transportation choices are selected as a method of travel, the more reduction in VMT per capita will be observed within the population.

While these policies can help to reduce the VMT per capita and VMT per employee, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the city as a whole. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this impact. This impact will remain significant and unavoidable.

Mitigation Measures

T-2a Street Network

For individual development projects within the Infill Rezone Program that will include an internal street network, provide a well-connected street network, particularly for non-motorized connections. Characteristics of street network connectivity include short block lengths, numerous three and four-way intersections, and minimal dead-ends (cul-de-sacs). Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in

VMT. The CAPCOA Handbook[4] Measure T-17 uses increased vehicle intersection density as a proxy for street connectivity improvements. The CAPCOA Handbook estimates that VMT can be reduced up to 30 percent if a development provides a street grid that has much greater density (up to about three times) of streets and street intersections than the average American street grid density of 36 street intersections per square mile.

T-2b Bicycle Network

For individual development projects within the Infill Rezone Program, contribute to increasing the length of the area bicycle network, including separated trails available to bicycles as well as on-street bike lanes. The CAPCOA Handbook Measure T-20 estimates that a 20 percent increase in bike network mileage could reduce citywide VMT by 0.01 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so this increase in bike network would reduce daily VMT by approximately 430. Note that these VMT reductions would occur citywide and would not exclusively affect project trips.

T-2c Transit Service

For individual development projects within the Infill Rezone Program, contribute to implementation of expanded transit service in Clovis, including potentially extending service to the project areas. Implementation of expanded transit service would require both capital expenditures for support facilities, including construction of transit stops and facilitating extensions of future transit routes. The CAPCOA Handbook Measure T-25 estimates that a 25 percent increase in transit service hours could reduce citywide VMT by 0.3 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so the expanded transit network would reduce daily VMT by approximately 12,850. Note that these VMT reductions would occur citywide and would not exclusively affect project trips.

Significance after Mitigation

Significant and unavoidable.

Threshold 3:	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)?

IMPACT T-3 DEVELOPMENT ASSOCIATED WITH THE PROJECT WOULD NOT INCREASE HAZARDS DUE TO GEOMETRIC DESIGN AND INCOMPATIBLE USES. THROUGH COMPLIANCE WITH APPLICABLE REGULATIONS, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Implementation of the proposed project would increase the number of users on the city's transportation system. There will be a need to ensure that hazards are not increased with the construction of new facilities and the addition of new users.

It is noted that the project is at a programmatic-level, which does not include actual design or construction of facilities. Hazards are typically assessed at the project-level when an actual design and construction of a circulation facility is proposed. Future development projects would be analyzed and evaluated in detail through the review process for those later projects. The city's design and construction standards and specifications provide for coordinated and standardized

[4] California Air Pollution Control Officers Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, December, 2021. Accessible at: https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf

development of city facilities, including roadways. The standards apply to, regulate, and guide the design and preparation of plans, and the construction of streets, highways, alleys, drainage, traffic signals, site access, and related public improvements.

The General Plan Circulation Element contains policies in support of safe circulation by all modes, including requirements that roadways are designed consistent with city standards, designed to provide adequate emergency access and address safety concerns. The Circulation Element includes policies to minimize the number and enhance safety at vehicular conflict points (Policy 3.7), and to partner with advocacy groups to improve design, location, and functionality of bicycle lanes to encourage safe travel (Policy 8.3).

Implementation of General Plan policies would ensure that each future project would have a less than significant impact related to hazards.

Mitigation Measures

No mitigation measures are required.

Threshold 4:	Would the project result in inadequate emergency access?

IMPACT T-4 DEVELOPMENT ASSOCIATED WITH THE PROJECT WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. THROUGH COMPLIANCE WITH CITY DEVELOPMENT STANDARDS, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

It is noted that the project is at a programmatic-level, which does not include actual site design or construction of facilities. The city's design and construction standards and specifications provide for coordinated and standardized development of city facilities, including roadways. The standards apply to, regulate, and guide the design and preparation of plans, and the construction of streets, highways, alleys, drainage, traffic signals, site access, and related public improvements, and ensure that emergency access to each site meets applicable standards.

The General Plan Circulation Element contains policies in support of safe circulation by all modes, including requirements that roadways are designed consistent with city standards, designed to provide adequate emergency access and address safety concerns. The Circulation Element includes policies to minimize the number and enhance safety at vehicular conflict points (Policy 3.7), and to partner with advocacy groups to improve design, location, and functionality of bicycle lanes to encourage safe travel (Policy 8.3).

Implementation of city standards for individual site development would ensure that each future project would have a less than significant impact related to emergency access.

Mitigation Measures

No mitigation measures are required.

4.13.4 Cumulative Impacts

VMT was calculated for the Clovis area including current city limits and the SOI. Table 4.13-4 summarizes the total citywide VMT for the 2019 baseline, the applicable threshold, and the future cumulative 2046 VMT with the RTP/SCS and the project. As shown in the table, cumulative conditions with the Infill Rezone Program project would result in decreased VMT per capita and VMT per employee in comparison to the 2019 baseline condition in Clovis. Residential VMT per

capita would decrease by 4.4 percent, from 16.1 to 15.4, but would still be above the regional impact threshold of 14.0. Non-residential VMT per employee would decrease by 10.6 percent, from 24.6 to 22.0, and would be below the regional impact threshold of 22.3.

While the General Plan policies can help to reduce the VMT per capita and VMT per employee, it is not anticipated that they would be sufficient to achieve the reduction of 13% below existing baseline for the city as a whole. The following mitigation measures would be required in conjunction with the development of land use and infrastructure projects in order to mitigate the VMT impacts to the extent feasible. However, there are no feasible mitigation measures that would fully mitigate this impact. This impact will remain significant and unavoidable.

Table 4.13-4 Cumulative Vehicle-Miles of Travel Results

Units	2019 Fresno County	2019 Clovis SOI	2046 RTP/SCS Clovis SOI Plus Project
VMT Per Capita			
Population	1,010,400	144,067	182,576
Residential VMT	16,267,400	2,153,575	2,609,846
VMT per Capita	16.1	16.1	15.4
Impact Threshold	14.0	14.0	14.0
VMT Per Employee			
Employees	404,100	36,537	44,568
Employee VMT	10,345,340	900,158	979,232
VMT per Employee	25.6	24.6	22.0
Impact Threshold	22.3	22.3	22.3
Total VMT	**51,389,619**	**5,451,855**	**8,747,093**

Source: Kittelson & Associates, 2025, applying Fresno COG travel model.

Mitigation Measures

Implement mitigation measures T-2a, T-2b, and T-2c.

Significance after Mitigation

Significant and unavoidable.

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4.14 Tribal Cultural Resources

This section evaluates the project's potential impacts relating to tribal cultural resources (TCRs) and cultural places. Public Resources Code (PRC) Section 21074 (a)(1)(A) and (B) defines TCRs as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe." Additionally, TCRs are those resources identified by California Native American tribes in consultation with lead agencies during tribal consultation [Senate Bill (SB) 18 and Assembly Bill (AB) 52 consultation]. Cultural places are defined as "a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine" (PRC Section 5097.9). The analysis in this section is based on a Cultural Resources Technical Report prepared by Rincon Consultants (Rincon) and the results of the City's SB 18 and AB 52 consultation. The Cultural Resources Technical Report and Consultation letters are provided in Appendix C and Appendix D of this Environmental Assessment (EA).

4.14.1 Setting

The 20 Infill Rezone Program sites are located within the Clovis City limits within the Central Valley. This region has been described as one of the largest intermontane basins extending 650 km from the Siskiyou to the Tehachapi mountains.[1] No single chronological framework covers the entirety of the Central Valley, but California prehistoric cultural chronology of the Central Valley is presented following Rosenthal et al. (2007), Moratto (1984), and Burns et al. (2012), which ultimately divides the chronology into five major periods: the Paleoindian (11,550–8,550 BCE), Lower Archaic (8,550–5,550 BCE), Middle Archaic (5,550–550 BCE), Upper Archaic (550 BCE–CE 1,100), and Emergent Period (CE 1,000 to Historic contact). Refer to Section 4.4, *Cultural Resources*, for more information on these time periods.

The project site is located in the traditional territory of the Penutian-speaking Yokuts, which includes San Joaquin Valley and surrounding foothills.[2,3] Three geographical divisions of the Yokuts are the Northern Valley, Southern Valley, and Foothill Yokuts. The distinction between the three groups is primarily based on language dialect.[4] The project is located at the approximate boundary between the ethnographic territories of the Northern and Southern Valley Yokuts, though more likely located within the ethnographic territory of the Southern Valley Yokuts, who occupied the southern San Joaquin Valley south of the San Joaquin River, to the foot of the Tehachapi Mountains. More specifically, the vicinity of the project site was likely within the territory of the Tachi.[3]

The Yokuts established large permanent village settlements, or closely associated smaller settlements. Residential structures were most often of two types: single-family dwellings and larger communal residences that housed 10 families or more. Villages frequently included mat-covered granaries and a sweathouse.[4,5] The closest known village sites to the project site were "Golon", near the present-day community of Huron (approximately 16 miles south of the project site); and

[1] Rosenthal, Jeffrey, Gregory White, and Mark Sutton. 2007.The Central Valley: A View from the Catbird's Seat. In California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar. AltaMira Press, Lanham Maryland.
[2] Kroeber, Alfred L. 1925 Handbook of the Indians of California. Bulletin 78, Bureau of American Ethnology, Smithsonian Institution. Government Printing Office, Washington, D.C. Reprinted 1976 by Dover Publications, Inc., New York.
[3] Wallace, William J. 1978 "Southern Valley Yokuts." In "California," edited by Robert F. Heizer, pp. 448–461. Handbook of North American Indians, Vol. 8, William C. Sturtevant, general editor, Smithsonian Institution, Washington.
[4] Mithun, Marianne 2001 The Languages of Native North America. Reprinted. Originally published 1999. Cambridge University Press, New York.
[5] Sutton, Mark Q., Jille K. Gardner, Kenneth W. Gobalet, and Nancy Valente 2016 "Archaeological Investigations at the Manifold Site (CA-KER-4220), Buena Vista Lake, Southern San Joaquin Valley, California." Pacific Coast Archaeological Society Quarterly, Vol. 52 (4), pp. 15-82.

"Udjiu", in a location later known as Posa de Chine or Poso Chane (approximately 18 miles south of the project site).[3] Most of the western San Joaquin Valley is regarded as too arid to have supported permanent village sites, though the area was likely used for hunting and utilized for travel.[6] The western periphery of the San Joaquin Valley was spanned by a major Native American trail, known by the Spanish name El Camino Viejo.[7] El Camino Viejo stretched from modern-day Los Angeles to Alameda County, and Cantua Creek served as a campsite along the route. Prominent intersecting east-west trails were likely found along Panoche Creek (20 miles north of project site) and Los Gatos Creek (16 miles south of project site), connecting Yokuts communities to their western neighbors through the Coast Range.[3] The Fresno Slough and other waterways also served as travel corridors by tule raft.[3,6]

The basic economic unit among the Yokuts was the nuclear family. The nuclear family was linked to totemic lineages based on patrilineal descent. Totem symbols were passed from father to offspring. Families that shared the same totem formed an exogamous lineage. Totems were associated with one of two moieties. This moiety division played a role during ceremonies and other social events. Yokuts were split into self-governing local groups that included several villages. Each group had a chief who directed ceremonies, mediated disputes, handled punishment of those doing wrong, hosted visitors, and provided aid to the impoverished. In certain cases, settlements had two chiefs, one for each moiety. Other political positions included the chief's messenger and the spokesman.[3]

Shamans were an important part of Yokut village life. A Yokut Shaman gained power through a dream or vision. If, after this vision, the man accepted the role as shaman, he would pray, fast, and acquire talismans to aid him in his future work. Shamans had the ability to heal the sick and served a primary role in religious life.[3]

Yokuts subsistence strategy was based on a mixed economy focused on fishing, collecting, and hunting small game. Fishermen employed tule rafts and caught fish with nets, spears, basket traps, and bow and arrows. They often gathered mussels and hunted turtles in lakes, rivers, and streams. Wild seeds and roots contributed a large portion to the Yokuts diet. Tule roots were gathered, dried, and pounded into a flour that was prepared as a mush. Tule seeds and grass and flowering herb seeds were prepared in the same way. Leaves and stems of certain plants, such as clover and fiddleneck, were also collected. Acorns, a staple of most California Native Americans, were not readily available in the ethnographic territory of the Yokuts. Some Yokuts tribes traded for acorns with neighboring groups, such as the Salinan and Chumash to the west, the Foothill Yokuts to the east, and the Kawaiisu and Kitanemuk to the southeast.[2] Waterfowl was frequently hunted with snares, nets, and bow and arrow. Land mammals and birds contributed a smaller part of the Yokuts diet. Small game was occasionally taken in snares or traps or shot with bow and arrow.[3,5]

Yokuts technology depended primarily on tule. Stems of the plant served as the raw material for baskets, cradles, boats, housing, and many other items. Manos and metates were used to process food and animal hides.[8,5] Tools such as knives, projectile points, and scraping tools were made from imported lithic materials, because stone was not readily available in the Central Valley. Some tools, such as bead drills, could be made from obsidian obtained from some distance or obtained through trade (Sutton et al. 2016). Marine shells secured through trade with coastal groups were used as shell money and personal adornment items, such as Olivella beads.[5,3]

[6] Gayton, A.H. 1945 Yokuts and Western Mono Social Organization. American Anthropologist 47(3):409-426.
[7] Davis, James 1961 Trade Routes and Economic Exchange Among the Indians of California. Reports of the University of California Archaeological Survey 54.
[8] Barton, Amber, Maria Del Carmen Guzman, and Breeann Romo 2010 The Preliminary Results of the 2008 Archaeological Investigations at the Bead Hill Site (KRE-450), Buena Vista Lake, California. SCA Proceedings 24: 1-12.

4.14.2 Regulatory Setting

a. Federal Regulations

American Indian Religious Freedom Act and Native American Graves and Repatriation Act

The American Indian Religious Freedom Act (AIRFA), enacted in 1978, is a federal law that affirms and protects the rights of American Indians, Alaska Natives, and Native Hawaiians to practice their traditional religions. Prior to AIRFA, many Indigenous religious practices-such as ceremonies, access to sacred sites, and possession of sacred objects-were restricted or even banned by federal policy. AIRFA recognizes the inherent right of Indigenous peoples to believe, express, and exercise their traditional religions, and it protects their access to sacred sites, the use and possession of sacred objects, and the freedom to conduct ceremonial rites. AIRFA requires federal agencies and institutions receiving federal funds (such as museums and universities) to return Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony to lineal descendants and culturally affiliated tribes or Native Hawaiian organizations. The law also mandates consultation with tribes and descendants when remains or cultural items are discovered on federal or tribal lands and establishes processes for planned excavations and inadvertent discoveries.

b. State Regulations

Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the California Native American Heritage Commission (NAHC). As noted in the California Office of Land Use and Climate Innovation (LCI)'s Tribal Consultation Guidelines, "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." [9] SB 18 refers to PRC Section 5097.9 to define cultural places as:

- A Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)

Assembly Bill 52

AB 52 expanded the California Environmental Quality Act (CEQA) by defining a new resource category, "tribal cultural resources." AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a TCR, when feasible (PRC Section 21084.3).

[9] Office of Land Use and Climate Innovation. 2005. Tribal Consultation Guidelines. Available: https://lci.ca.gov/docs/011414_Updated_Guidelines_922.pdf (accessed May 2025).

PRC Section 21074 (a) defines TCRs as either of the following:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
    a. Included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR).
    b. Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Assembly Bill 978

In 2001, AB 978 expanded the reach of Native American Graves Protection and Repatriation Act of 1990 and established a state commission with statutory powers to assure that federal and state laws regarding the repatriation of Native American human remains and items of patrimony are fully complied with. In addition, AB 978 also included non-federally recognized tribes for repatriation

California Register of Historic Resources

The CRHR was established in 1992 and codified in PRC Section 5020, 5024 and 21085. The law creates several categories of properties that may be eligible for the CRHR. Certain properties are included in the program automatically, including: properties listed in the National Register of Historic Places (NRHP); properties eligible for listing in the NRHP; and certain classes of State Historical Landmarks. Determining the CRHR eligibility of historic and prehistoric properties is guided by California Code of Regulations (CCR) Section 15064.5(b) and PRC Section 21083.2 and 21084.1. Cultural resources, under CRHR guidelines, are defined as buildings, sites, structures, or objects that may have historical, architectural, archaeological, cultural, or scientific importance. A cultural resource may be eligible for listing on the CRHR if it:

- is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- is associated with the lives of persons important in our past;
- embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values; or
- has yielded, or may be likely to yield, information important in prehistory or history.

c. Local Regulations

City of Clovis General Plan

The City's 2014 General Plan includes several policies relevant to the project and the protection of TCRs. Such policies include:

Open Space and Conservation Element

Goal 2: Natural, agricultural, and historic resources that are preserved and promoted as key features for civic pride and identity.

> **Policy 2.9 National and State Historic Resources.** Preserve historical sites and buildings of state or national significance in accordance with the Secretary of Interior Standards for Historic Rehabilitation.
>
> **Policy 2.12 Public Education.** Support public education efforts for residents and visitors about the unique historic, natural, and cultural resources in Clovis.

Public Facilities and Services Element

Goal 4: Community facilities and programs that connect members of all ages and abilities to a broad range of cultural, informational, and recreational resources.

> **Policy 4.1 Cultural Facilities.** Encourage the establishment of a broad range of facilities and events that expose Clovis residents to a variety of cultures, the arts, history, and technology.

4.14.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

Given the programmatic nature of this EA, all future housing developments would require project-level tribal cultural analysis to identify the potential presence of TCRs. The Cultural Resources Technical Report (Appendix C) which supports this analysis utilized a background and archival research, CHRIS records search, and a NAHC Sacred Lands File (SLF) search. More information about the background archival research and CHRIS records search can be found in Section 4.4, *Cultural Resources*.

Rincon contacted the NAHC on April 9, 2025, to request a SLF search, as well as a contact list of Native Americans culturally affiliated with the project area. On April 9, 2025, the NAHC responded to Rincon's SB 18 contacts request and SLF request, stating that the results of the SLF search were negative. See Appendix D for the NAHC response, including Tribal contacts list(s).

Rincon did not conduct any outreach to the Native American contacts in the area. The City conducted tribal outreach in accordance with SB 18 and AB 52 as seen below.

Senate Bill 18 and Assembly Bill 52 Consultation

On March 26, 2025, the City sent SB 18 and AB 52 notification letters via certified mail to 11 Native American tribal contacts from eight distinct tribes identified by the NAHC as being traditionally and culturally affiliated with the Place of Use. The tribes that were contacted include the following:

- Amah Mutsun Tribal Band
- Kitanemuk & Yowlumne Tejon Indians
- Northern Valley Yokut / Ohlone Tribe
- Picayune Rancheria of the Chukchansi Indians
- Table Mountain Rancheria
- Traditional Choinumni Tribe
- Tule River Indian Tribe
- Wuksachi Indian Tribe/Eshom Valley Band

The City also sent AB 52 letters to tribes who have submitted written requests to be notified of any potential development within the City. These tribes include:

- Santa Rosa Rancheria Tachi-Yokut Tribe
- Table Mountain Rancheria
- Torres-Martinez Desert Cahuilla Indians

Under SB 18 and AB 52, tribes have 90 and 30 days to respond and request consultation, respectively. As of the writing of this EA, the City has received two responses, one from the Traditional Choinumni Tribe and the other from the Table Mountain Rancheria. No responses were received from the other nine groups notified.

On April 2, 2025, the Traditional Choinumni Tribe responded to the City's letter stating that they are always concerned regarding the potential unearthing of cultural resources during construction. If a cultural resource were to be discovered, all work must stop and a professional archaeologist would need to assess findings and make the appropriate mitigation recommendations. They had no other concerns with the project at this time.

On April 30, 2025, the Table Mountain Rancheria tribe responded to the City's letter stating that they declined participation in consultation at this time but would like to be notified if any cultural resources are identified.

Significance Thresholds

According to Appendix G of the *CEQA Guidelines*, impacts related to TCRs would be significant if the proposed project would:

1. Cause a substantial adverse change in the significance of a TCR, defined in PRC 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) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or
    b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC 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. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k), or b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Impact TCR-1 NO KNOWN TCRS HAVE BEEN IDENTIFIED WITHIN THE INFILL REZONE PROGRAM SITES. HOWEVER, THE PROJECT MAY CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A PREVIOUSLY UNKNOWN OR UNIDENTIFIED TCR DUE TO GROUND DISTURBANCE DURING PROJECT CONSTRUCTION ACTIVITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

The project itself would not generate any development or impacts to TCRs. Any future project resulting in development made possible by this upzoning project may be subject to project-level CEQA analysis and may require future, project-specific consultation with tribal groups. As such, project-level mitigation measures may arise through subsequent SB 18 and/or AB 52 consultation undertaken as part of CEQA analysis for future development projects.

Additionally, as identified by the Cultural Resources Technical Report discussed in Section 4.4, *Cultural Resources,* no TCRs listed or eligible for listing in the CRHR were identified. On April 9, 2025, as a part of the Cultural Resources Technical Report, the NAHC conducted a SLF search for the project area. The SLF search did not identify the presence of known TCRs within or in the vicinity of the Infill Rezone Program sites.

As discussed above, only two out of 11 contacted tribes responded to the City's SB 18 and AB 52 letters alerting tribes of the project. Both tribes that responded wished to be notified if any TCRs were discovered during excavation of future development projects. There is always the potential to uncover buried archaeological and TCRs during ground disturbing activities, which could potentially be considered TCRs eligible for listing in the CRHR or a local register or be considered TCRs. Should project construction activities encounter and damage or destroy a TCR or resources, impacts would be potentially significant. Mitigation Measure (MM) TCR-1 would ensure that TCRs are preserved in the event they are uncovered during construction and would reduce impacts regarding disrupting TCRs to a less than significant level. Implementation of MM TCR-1 would ensure that consultation with local Native Americans would occur if resources of Native American origin are unearthed during construction, and that implementing a mitigation plan would be implemented if a previously unknown TCR is discovered during project construction. This would reduce impacts to TCRs to less than significant with mitigation.

Mitigation Measure

TCR-1 Inadvertent Discoveries During Construction

In the event that cultural resources of Native American origin are identified during grading or construction, all earth disturbing work within a 50-foot radius of the find shall be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the find; an appropriate Native American representative, based on the nature of the find, is consulted; and mitigation measures are put in place for the disposition and protection of any find pursuant to Public Resources Code Section 21083.2. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource (TCR) and thus significant under the California Environmental Quality Act, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s) prior to continuation of any earth disturbing work within the vicinity of the find. The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for TCRs include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery through capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measures.

Significance after Mitigation

Less than significant with mitigation measure incorporated.

4.14.4 Cumulative Impacts

The geographic scope for cumulative impacts related to TCRs is the regional area. This geographic scope is appropriate because TCRs have the potential to extend across large areas.

Projects developed following the upzoning of Infill Rezone Program sites in conjunction with past, present, and reasonably foreseeable future projects, would result in ground disturbance in locations where TCRs have currently not been identified but have the potential to occur. As such, cumulative development could adversely impact TCRs. However, TCR evaluations and SB 18 and/or AB 52 consultations would be completed by the appropriate jurisdiction on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures, monitoring during ground disturbance within culturally sensitive areas, and preparation of mitigation plans for the inadvertent discovery of TCRs, would address impacts related to TCRs associated with future development. Therefore, cumulative development would have a less-than-significant cumulative impact involving substantial adverse changes in the significance of a TCR.

Mitigation Measures

Implement mitigation measure TCR-1.

Significance after Mitigation

Less than significant with mitigation measures.

4.15 Utilities and Service Systems

This section analyzes the effects of the proposed project on utilities and service systems. It considers potential impacts to water supply and infrastructure, wastewater conveyance and treatment facilities, stormwater and drainage facilities, solid waste disposal, electricity and natural gas, as well as telecommunications facilities.

4.15.1 Setting

a. Water

The City of Clovis (City) relies upon groundwater, surface water, treated wastewater and recycled water for water supply. Potable water is supplied by underground aquifers and the City's Surface Water Treatment Plant (SWTP).[1]

Groundwater

The City boundaries lie within the Kings Groundwater Subbasin, a part of the San Joaquin Basin Hydrologic Area. The Kings Subbasin has been identified as critically overdrafted in the City's Urban Water Management Plan (UWMP).[2] The City's water system includes over 30 wells with a combined capacity of approximately 37,690 gallons per minute (gpm), with an additional 4,750 gpm planned in the coming years. In 2020, the City extracted 12,105 acre-feet (AF) of groundwater and performed 5,316 AF of intentional recharge activities.

To comply with the Sustainable Groundwater Management Act (SGMA), the City collaborated with other agencies in the subbasin to develop the North Kings Groundwater Sustainability Plan (NKGSP). This plan outlines the subbasin's characteristics and provides a roadmap for achieving sustainable aquifer management by 2040.[3] The net impact in 2020 was positive, contributing to slowing or reversing groundwater level declines. The City remains committed to recharge efforts, as reflected in its projected intentional groundwater recharge activities. In 2020, recharge was 5,316 AF, while the City's 30-year average groundwater recharge quantity is approximately 8,412 acre-feet per year (AFY).[4]

Surface Water

Fresno Irrigation District

Surface water is supplied to the City through an agreement with the Fresno Irrigation District (FID) by which the City receives a portion of FID's entitlement to Kings River Water proportional to the amount of FID land that lies within the City. FID is a member of the Kings River Water Association which holds water rights licenses for all of the Kings River and storage rights licenses on Kings River

[1] City of Clovis. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php
[2] City of Clovis. 2020. 2020 Urban Water Management Plan update. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520
[3] North Kings Groundwater Sustainability Agency. 2025. 2025 Groundwater Sustainability Plan. Accessible at: https://northkingsgsa.org/groundwater-sustainability-plan/
[4] City of Clovis. 2020. 2020 Urban Water Management Plan update. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520

reservoirs. FID is entitled to water based upon a prorated monthly schedule determined by the natural flow of the Kings River. Surface water is treated before delivery to customers at the SWTP.

Two additional water districts are located within the City's General Plan boundaries: Garfield Water District and International Water District.

Water Banking Facilities

Two banking facilities have been constructed in Central Fresno County: Waldron Pond and the Boswell Groundwater Banking Facility. The City entered into an agreement with FID to help finance the construction of the Waldron Banking Facilities, a dedicated water banking project. Under this agreement, the City is entitled to receive up to 90% of the annual yield (approximately 9,000 AF).

The purpose of these facilities is to reserve surplus water supplies, thereby making it available to the City as needed during dry periods. Excess that is not withdrawn from the aquifer will restore groundwater levels in the region. The City will have access to surplus water banked at the Boswell Groundwater Banking Facility whereby up to 4,500 AFY of surface water.

Wastewater and Recycled Water Supply

Clovis Water Reuse Facility

The City constructed a Water Reuse Facility, a wastewater treatment plant, that began service in 2009. The facility produces a disinfected, tertiary-treated water supply, which is used for both landscaping and agricultural uses.

Regional Wastewater Treatment Plant Exchange

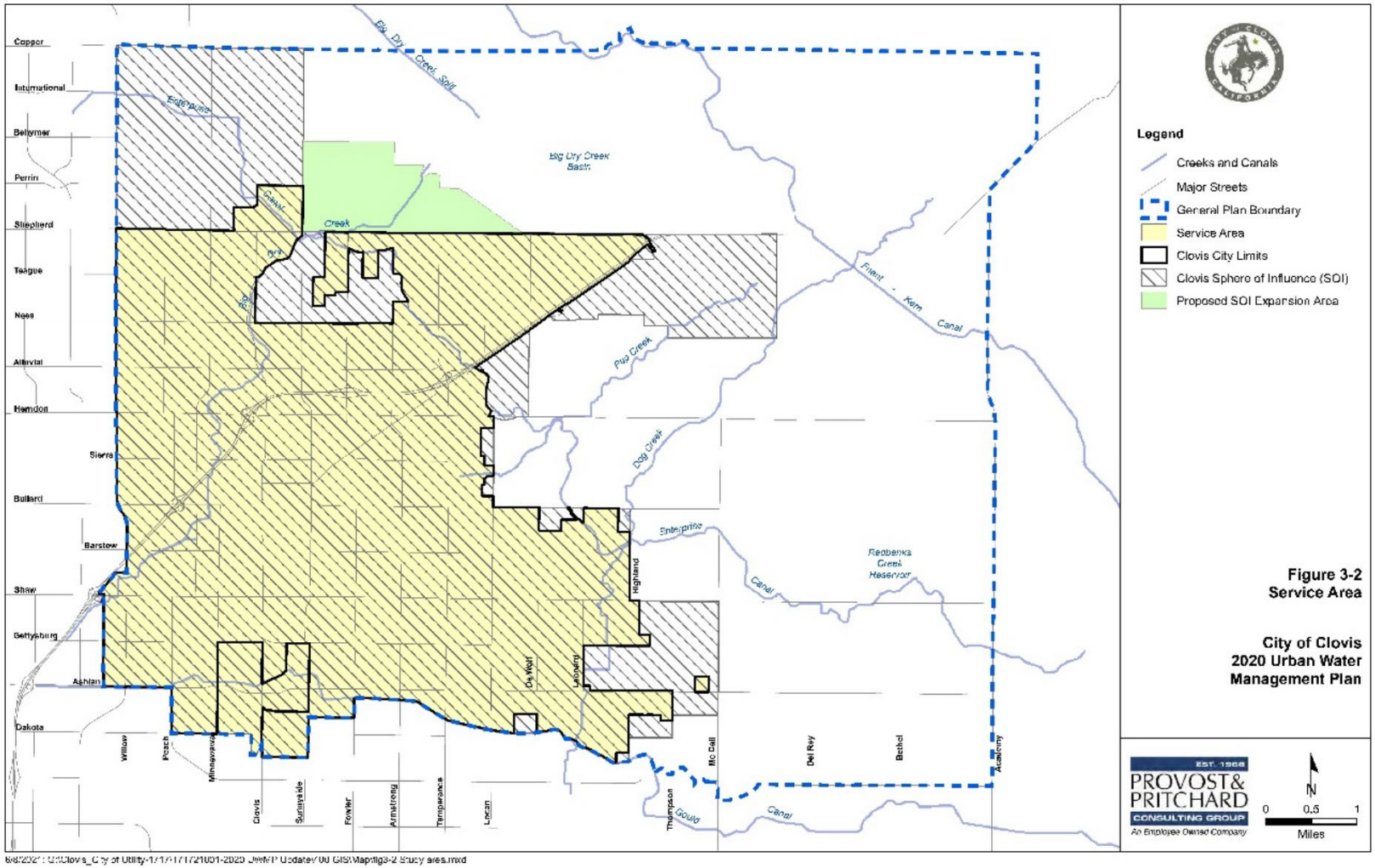
A large portion of the City of Clovis' wastewater is treated at the Fresno-Clovis Regional Wastewater Reclamation Facility (RWRF), located southwest of the City of Fresno. It is approximately 16 miles by trunk sewer to the City. Currently, the water is treated to the secondary level and then some is spread in percolation ponds and some is used directly on non-food crops. The Fresno-Clovis RWRF serves approximately 510,000 residents in the Fresno/Clovis area.[5] In 2016 the RWRF had a treatment capacity of 88 million gallons per day (mgd), making it the fourth largest municipal wastewater facility in Northern California.

Water Service

The City's Public Utilities Department (PUD) is the sole municipal water purveyor to approximately 106,000 residents in the City and sphere of influence (SOI). The City's PUD also provides water to Tarpey Village, a small unincorporated county island with a population of 3,609.[6] The applicable service boundaries and City water distribution system are shown in Figure 4.15-1 below.

[5] Environmental Protection Agency. City of Fresno Reclamation Facility. 2016. Accessed November 2025: https://www.epa.gov/sites/default/files/2016-05/documents/wrrf_fresno_v2_may_12.pdf
[6] U.S. Census. 2019. Tarpey Village , CA. Accessible at: https://censusreporter.org/profiles/16000US0677960-tarpey-village-ca/

Figure 4.15-1 City of Clovis Water System Service Area



Current and Projected Water Demand and Supply

Current and Projected Use

The majority of water demand within the City's service area is for residential uses. Commercial, institutional, industrial, and landscape uses account for approximately 15 percent of the total water usage. Table 4.15-1 below shows the Actual Volume of current and projected potable and non-potable water use in the city.

Table 4.15-1 Current (2020) and Future Potable and Non-potable Water Use

Use Type	2020 Water Use (AF)	Projected 2030 (AF)	Projected 2035 (AF)	Projected 2040 (AF)
Single Family	16,638	18,558	20,353	22,237
Multi-Family	2,434	2,715	2,978	3,226
Commercial	2,518	3,346	3,670	4,026
Institutional	703	934	1,025	1,124
Industrial	267	355	389	427
Landscape	1,102	1,465	1,607	1,763
Other	76	101	111	122
Losses	1,090	1,449	1,589	1,743
Groundwater Recharge	5,316	8,400	8,400	8,400
Total	**30,144**	**37,324**	**40,122**	**43,198**

Source: Clovis UWMP. 2020.

Current and Projected Water Supply

Current and future supplies through 2040, as included in the 2020 UWMP, are shown in Table 4.15-2. The future supply projections assume normal surface water entitlements from the FID and incorporated water districts based on the most recent 30-year averages and anticipated growth rates for the City.

Table 4.15-2 Current (2020) and Future Potable and Non-potable Water Supply

Water Supply	2020 Water Supply (AF)*	Projected 2030(AF)	Projected 2035 (AF)	Projected 2040 (AF)
Groundwater	12,105	10,753	10,076	9,400
Surface Water	18,039	27,584	32,508	39,400
Storage Supply	0	13,500	13,500	13,500
Recycled	710	5,500	6,300	9,400
Transfers (Garfield)	N/A	1,100	1,650	1,750
Transfers (International WD)	N/A	500	1,000	1,200
Total	**30,854**	**58,937**	**65,034**	**74,650**

Source: Clovis UWMP. 2020.

*The 2020 UMWP identifies 2020 as a dry year supply. The actual 2020 supply (Total Right or Safe Yield) for the service area consisting of surface water, groundwater, supply water from storage and recycled water for 2020 was 53,748 AF.

As shown, water supply is projected to increase to 74,650 AFY in 2040. Water demand is projected to increase to 43,198 AFY in 2040. The City has identified adequate water supply to meet water demands as projected for 2040 in the 2020 UWMP.

Water Conservation

The City of Clovis UWMP provides mitigation measures for potential water shortages focused on both increasing supply and reducing demand. Methods to increase water supply in the City require the construction of new facilities and thus have a lead time of at least one year before production is increased. Demand reduction techniques are considered more feasible and immediate solutions to a potential water shortage.

Water Supply Contingency Plan

The Urban Water Management Planning Act (UWMPA) requires that each UWMP include a Water Shortage Contingency Analysis (WSCP). The WSCP includes actions an urban water supplier will take during water supply shortages, including scenarios where supplies are reduced by more than 50 percent. It must also define specific water supply conditions associated with each shortage level in compliance with California Water Code Sections 10632 and 10635.

The City's 2020 WSCP classifies water shortages in four stages and details target demand reductions and necessary actions for each stage.[7] In addition to these action levels, the City is required to establish mandatory prohibitions on certain water uses during shortages and implement consumption reduction measures at the most restrictive levels.

b. Wastewater

Wastewater Service

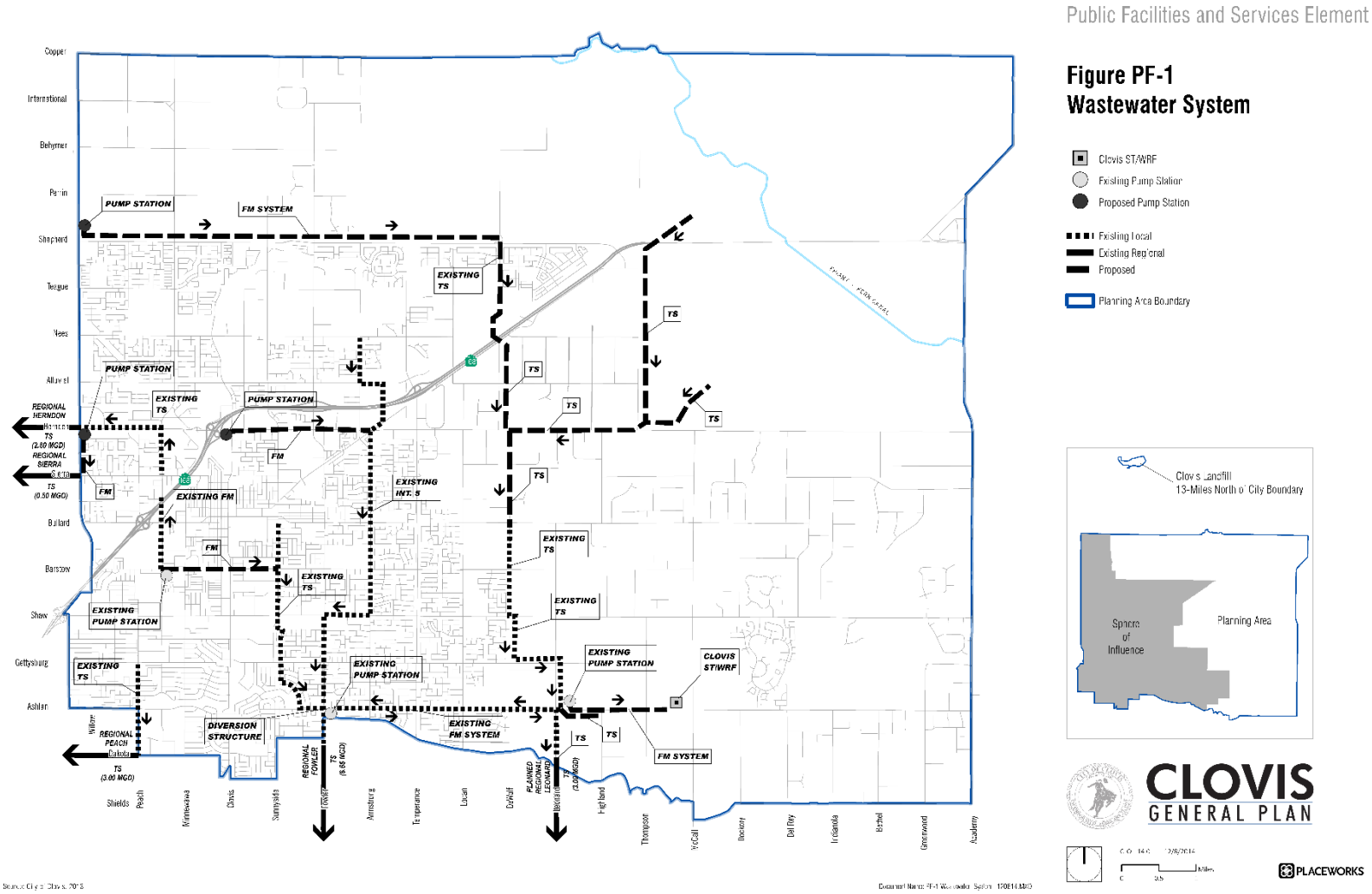
The City's PUD provides wastewater collection services within the City limits. The Clovis Wastewater Collection System Master Plan describes the sewer system infrastructure within the City and covers a service area of just over 23,500 acres and seven major service areas.[8] These seven major wastewater service areas also represent the City's entire water service area. According to the 2020 UWMP, under existing conditions, the Herndon, Fowler, Sierra, and Peach service areas discharge into the City's regional trunks, which convey flows to the RWRF. Flow from the remaining three service areas (Northwest, Northeast, and Southeast) are conveyed to the Clovis Water Reuse Facility. Herndon, Fowler, Sierra, and Peach service areas will continue to discharge to regional trunk sewers and on to the Fresno-Clovis RWRF.

Wastewater Infrastructure

The wastewater collection and treatment infrastructure serving the City is provided by the PUD. According to the 2017 Wastewater Collection System Master Plan, the City generates an average daily flow of 7.018 mgd (7,861 AFY).[9] Wastewater system map is shown in Figure 4.15-2.

[7] City of Clovis. Water Supply Contingency Plan. 2020. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-WSCP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520
[8] City of Clovis. 2017. Wastewater Collection System Master Plan. Clovis, CA: City of Clovis
[9] Ibid.

Figure 4.15-2 Clovis Wastewater Service Area



Source: 2014 Clovis General Plan. Public Facilities and Services Element.

Fresno-Clovis Regional Water Reclamation Facility

The majority of wastewater within the City is currently discharged to the Fresno-Clovis RWRF in southwest Fresno. The RWRF is owned and operated by the City of Fresno and currently has a treatment capacity of approximately 68 mgd.[10] By an agreement with the City of Fresno, the City is entitled to 9.3 mgd of this capacity. The City may also acquire additional capacity at the RWRF, if required. In 2020, 6,213 AF was treated at the RWRF.

Water Refuse Facility

The City operates the Water Reuse Facility to treat and disperse wastewater. In 2020, 2,496 AF of wastewater was treated at the Water Reuse Facility.[11] Water is used for irrigation of public and private landscape within the service area.

Wastewater Treatment Capacity

The City's Wastewater Master Plan provides estimates for current and projected wastewater treatment capacity. Construction and financing of major sewer trunk lines, treatment capacity and recycled water transmission to serve growth is funded in the City with development impact fees included in Clovis Municipal Code (CMC) Section 6.4.03.

The City's 2014 General Plan Environmental Impact Report (EIR) examined the current and planned treatment capacity of the Water Refuse Facility and the RWRF as shown in Table 4.15-3 below.

Table 4.15-3 Wastewater Treatment Capacity

Treatment Facility	2008 Available Treatment Capacity (mgd)	Planned Treatment Capacity (mgd)
Clovis Water Refuse Facility	2.8	8.4
Fresno-Clovis RWRF	9.3	12.2
Total	**12.1**	**20.6**

Source: City of Clovis 2014 General Plan EIR.

According to the 2014 General Plan EIR, wastewater generated in the City was treated at regional wastewater treatment facilities. At that time, wastewater generation was estimated at approximately 7.0 mgd, based on flow metering data collected between June 2013 and May 2014. With a population of 102,188, the per capita generation rate was about 69 gallons per person per day. The General Plan EIR evaluated a conservative estimate per person (85 for single-family and 95 for multi-family), and 0.2 gallons per square foot for non-residential and determined that total wastewater generations was approximately 11.15 mgd and projected the 2035 Scenario to generate about 19.7 mgd of wastewater.

[10] City of Fresno. Fresno-Clovis Regional Wastewater Reclamation Facility. Accessed November 2025: https://www.fresno.gov/publicutilities/sewer-wastewater/wastewater-facilities-infrastructure/#regional-wastewater-reclamation-facility
[11] City of Clovis. 2020. 2020 Urban Water Management Plan update. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-UWMP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=202507181312520

c. Stormwater

The storm drain system within the City is operated and maintained by the Fresno Metropolitan Flood Control District (FMFCD). The FMFCD service area includes both the Fresno and Clovis urban areas which are protected by three dams and seven large detention basins, and is served by a system of more than 700 miles of pipeline and more than 150 stormwater retention basins. FID canal system facilitates groundwater recharge during dry periods, providing an annual average of over 45,000 AF across approximately 100 basins.[12]

d. Solid Waste

The City PUD collects solid waste; recycling and organic materials collection is provided under contract by Mid Valley Disposal. Solid waste generated within the City is delivered to the City's landfill, American Avenue Disposal Site, and Avenal Regional Landfill. Construction debris and waste is hauled by City contractors, self-hauled by homeowners and businesses, or residual waste from recycling operations going to other landfills.

The City employs the "single stream" method of recycling in which all recyclable material (other than organic waste) goes into one collection receptacle. Recycling and organics are collected by the City's contract service. The Integrated Waste Management Act (2000) requires all local jurisdictions to divert 50 percent of total annual solid waste tonnage to be recycled. The City's total solid waste disposal amount in 2024 was approximately 100,178 tons.[13]

Construction and Demolition Debris

Construction and demolition debris within the City must adhere to CMC Chapter 6.3.1. Applicants must submit a Waste Management Plan to the Compliance Official unless they use an Authorized Construction and Demolition Debris Collector.

Hazardous Waste Disposal

The Clovis Dropoff Center, located at 79 North Sunnyside Avenue, allows residents to dispose of household hazardous materials such as batteries, motor oil, and household paints free of charge.

e. Telecommunications, Electricity and Natural Gas

Telecommunications services in Clovis are provided by private companies, such as AT&T, Xfinity, Viasat, Verizon, and other providers which provide internet and phone services.

Pacific Gas & Electric Company (PG&E) is the primary provider of electricity and natural gas. PG&E services approximately 5.2 million residents throughout Northern and Central California with electric service and 4.3 million residents with natural gas.[14] Natural gas and electricity are addressed in greater detail in Section 4.5, *Energy*.

[12] Fresno Metropolitan Flood Control District. About Fresno Metropolitan Flood Control District. Accessed October 2025: https://www.fresnofloodcontrol.org/
[13] CalRecycle. 2024. Disposal Reporting. Accessible at: https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial
[14] Natural Gas and California. CPUC. Accessed October 2025: https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california

4.15.2 Regulatory Setting

a. Federal Water Regulations

Clean Water Act

The federal Clean Water Act, enacted by Congress in 1972 and amended several times since, is the primary federal law that regulates water quality in the United States. It forms the basis for several State and local laws throughout the country. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. Environmental Protection Agency the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers (USACE). At the state and regional levels in California, the act is administered and enforced by the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs).

b. State Water Regulations

Senate Bill 610

In 2001, California adopted Senate Bill (SB) 610, thereby amending California Water Code. Under this law, certain types of development projects are now required to provide detailed water supply assessments to planning agencies. Any project that is subject to CEQA and would demand more than 75 AFY of water, or an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project, is subject to SB 610 and is required to prepare a Water Supply Assessment (WSA). The primary purpose of a WSA is to determine whether the identified water supply or water supplier will be able to meet projected demands for the project, in addition to existing and planned future uses, over a 20-year projection and with consideration to normal, dry, and multi-dry water years.

Senate Bill 221

Whereas SB 610 requires a written assessment of water supply availability, SB 221 requires lead agencies to obtain an affirmative written verification of sufficient water supply prior to approval of certain specified subdivision projects. For this purpose, water suppliers may rely on an UWMP if the update to the General Plan (including a Housing and Safety Element Update) is accounted for within the UWMP, a WSA or other acceptable information that constitutes "substantial evidence." "Sufficient water supply" is defined in SB 221 as the total water supplies available during normal, single-dry and multiple-dry water years within the 20-year (or greater) projection period that are available to meet the projected demand associated with the General Plan Update, in addition to existing and planned future uses. WSAs are required for residential projects of more than 500 units or a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space. Because the proposed project is a plan and not a subdivision project, it does not require affirmative written verification of sufficient water supply.

California Safe Drinking Water Act

The California Safe Drinking Water Act (SDWA) (Health & Safety Code Section 116270 et seq.; 22 Cal. Code Regs. Section 64400 et seq.) regulates drinking water more rigorously than the federal law. Like the Federal SDWA, California requires that primary and secondary maximum contaminant levels be established for pollutants in drinking water; however, some California maximum contaminant levels are more protective of health. The Act also requires the SWRCB to issue domestic water supply permits to public water systems.

Implementation of the federal SDWA is delegated to the State of California. The SWRCB enforces the federal and state SDWAs and regulates more than 7,500 public water systems across the state. The SWRCB's Division of Drinking Water oversees the State's comprehensive Drinking Water Program. The Drinking Water Program is the agency authorized to issue public water systems permits.

Sustainable Groundwater Management Act

In September 2014, the governor signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The SGMA gives local agencies the power to sustainably manage groundwater and requires groundwater sustainability plans to be developed for medium- and high-priority groundwater basins, as defined by the Department of Water Resources (DWR).

Urban Water Management Planning Act

In 1983, the California Legislature enacted the UWMPA (Water Code, Section 10610 et seq.), which requires urban water suppliers to develop water management plans to actively pursue the efficient use of available supplies. Every five years, water suppliers are required to develop UWMPs to identify short-term and long-term water demand management measures to meet growing water demands.

Porter-Cologne Water Quality Control Act (California Water Code)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code Section 13000, *et seq*.) includes provisions to address requirements of the Clean Water Act. These provisions include National Pollutant Discharge Elimination System (NPDES) permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State, including groundwater and surface water, must be protected for the use and enjoyment by the people of the State.

In California, the NPDES program is administered by the SWRCB through the RWQCB and requires municipalities to obtain permits that outline programs and activities to control wastewater and stormwater pollution. The federal Clean Water Act prohibits discharges of stormwater from construction projects unless the discharge follows an NPDES permit. The SWRCB is the permitting authority in California and adopted an NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities, otherwise known as the Construction General Permit (Order 2009-0009, as amended by Orders 2010-0014-DWQ and 2012-006-DWQ). The Order applies to construction sites that include one or more acre of soil disturbance. Construction

activities include clearing, grading, grubbing, excavation, stockpiling, and reconstruction of existing facilities involving removal or replacement. The Construction General Permit requires that the landowner and/or contractor file permit registration documents prior to commencing construction and then pay a fee annually through the duration of construction. These documents include a notice of intent, risk assessment, site map, stormwater pollution prevention plan (SWPPP), and signed certification statement. The SWPPP must include measures to ensure that: all pollutants and their sources are controlled; non-stormwater discharges are identified and eliminated, controlled, or treated; site Best Management Practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges; and BMPs installed to reduce or eliminate pollutants after construction are completed and maintained. The Construction General Permit specifies minimum BMP requirements for stormwater control based on the risk level of the site. The Permit also specifies minimum qualifications for a qualified SWPPP developer and qualified SWPPP practitioner.

c. Local Water Regulations

Urban Water Management Plan

The City has adopted a 2020 UWMP, as required by California Water Code (CWC) sections 10610 to 10656 and WSCP (CWC Section 10632 and 10635). The UWMP was created in order to maintain efficient use of urban water supplies, continue to promote conservation programs and policies, ensure that sufficient water supplies are available for future beneficial use, including drought response. The WSCP addresses the City's water system in a multiple dry year condition, the City will need to enact this WSCP to reduce demands through a variety of conservation efforts as demonstrated in the WSCP.

Clovis Municipal Code

CMC Chapter 6.5, Water System, addresses water connections and extensions, restrictions, water conversation and waste prevention, and water fees.

City of Clovis General Plan

The following goals and policies of the City's General Plan related to water are applicable to the project.

Public Facilities and Services Element

Goal 1: Reliable and cost-effective infrastructure systems that permit the city to sustainably manage its diverse water resources and needs.

Policy 1.1: New development shall pay its fair share of public facility and infrastructure improvements.

Policy 1.2: Require that new development demonstrate contractual and actual sustainable water supplies adequate for the new development's demands.

Policy 1.3: Prior to annexation, the city must find that adequate water supply and service and wastewater treatment and disposal capacity can be provided for the proposed annexation. Existing water supplies must remain with the land and be transferred to the City upon annexation approval.

Policy 1.4: The City may require developments to install onsite or offsite facilities that are in excess of a development's fair share. However, the City shall establish a funding mechanism for future development to reimburse the original development for the amount in excess of the fair share costs.

Policy 1.5: Use recycled water to reduce the demands for new water supplies. Support the expansion of recycled water infrastructure throughout Clovis and require new development to install recycled water infrastructure where feasible.

Policy 1.6: Periodically update water, recycled water, wastewater, and stormwater master plans and require all new development to be consistent with the current master plans.

Policy 1.7: Stabilize groundwater levels by requiring that new development water demands not exceed the sustainable groundwater supply.

Policy 1.8: Protect existing and future water, wastewater, and recycled water facilities from encroachment by incompatible land uses that may be allowed through discretionary land use permits or changes in land use or zoning designations.

Open Space and Conservation Element

Goal 3: A built environment that conserves and protects the use and quality of water and energy resources.

Policy 3.3: Prohibit the use of new private wells in new development.

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

Policy 3.5: Encourage new development and substantial rehabilitation projects to exceed energy and water conservation and reduction standards set in the California Building Code.

d. Federal Stormwater Regulations

Clean Water Act Section 402

Section 402 of the Clean Water Act requires that all construction sites on an acre or greater of land, as well as municipal, industrial and commercial facilities discharging wastewater or stormwater directly from a point source (e.g., pipe, ditch, or channel) into a surface water of the United States must obtain permission under the NPDES permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

According to federal regulations, NPDES permit coverage for stormwater discharges associated with construction activity can be obtained through individual State permits or general permits. Individual permitting involves the submittal of specific data on a single construction project to the appropriate permitting agency that will issue a site-specific NPDES permit to a project. NPDES coverage under a general permit involves the submittal of a Notice of Intent by the regulated construction project that they intend to comply with a general permit to be developed by USEPA or a state with delegated permitting authority.

Cobey-Alquist Floodplain Management Act

The Cobey-Alquist Floodplain Management Act (Water Code Section 8400-8435) gives support to the National Flood Insurance Program by encouraging local governments to plan, adopt, and enforce land use regulations for floodplain management, to protect people and property from flooding hazards. The Act also identifies requirements that jurisdictions must meet to receive State financial assistance for flood control.

e. State Stormwater Regulations

California Construction Stormwater Permit

The California Construction Stormwater Permit (Construction General Permit), adopted by the SWRCB, regulates construction activities that include soil disturbance of at least one acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater, authorized non-stormwater discharges, and all discharges that contain a hazardous substance in excess of reportable quantities established at 40 Code of Federal Regulations (CFR) 117.3 or 40 CFR 302.4, unless a separate NPDES Permit has been issued to regulate those discharges.

The Construction General Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters
- Develop and implement a Stormwater Pollution Protection Plan which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards
- Perform inspections and maintenance of all BMPs.

Typical BMPs contained in Stormwater Pollution Protection Plans are designed to minimize erosion during construction, stabilize construction areas, control sediment and pollutants from construction materials, and address post construction runoff. The Stormwater Pollution Protection Plan also includes a plan for inspection and maintenance of all BMPs, as well as procedures for altering or increasing BMPs based on changing project conditions.

California Green Building Standards Code

The California Green Building Standards Code (24 CCR, Part 11) includes mandatory measures for residential and nonresidential development. For example, Section 4.106.2 requires residential projects that disturb less than one acre and are not part of a larger common plan of development to manage stormwater drainage during construction through on-site retention basins, filtration systems, and/or compliance with a stormwater management ordinance. Section 5.106.1 requires newly constructed nonresidential projects and additions of less than one acre to prevent the pollution of stormwater runoff from construction through compliance with a local ordinance or implementing BMPs that address soil loss and good housekeeping to manage equipment, materials, and wastes. Section 5.303 sets measures for indoor water use for non-residential development requiring metering devices to conserve water.

f. Local Stormwater Regulations

Clovis General Plan

The following goals and policies of the City of Clovis General Plan related to stormwater are applicable to the project.

Open Space and Conservation Element

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

Policy 3.1: Encourage the use of low impact development techniques that retain or mimic natural features for stormwater management.

Policy 3.2: Minimize the use of non-point source pollutants and stormwater runoff.

g. Federal Wastewater Regulations

Clean Water Act Section 401

Under Section 401 of the Clean Water Act, the RWQCBs have regulatory authority over actions in waters of the United States and/or the State of California through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the Clean Water Act, described above). Section 401 of the Clean Water Act provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find that the proposed discharge would comply with State water quality standards, including those protecting beneficial uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued. This water quality certification is generally required for projects requiring Section 404 authorization involving the discharge of dredged or fill material to wetlands or other waters of the United States.

Clean Water Act Section 402

Section 402 of the Clean Water Act requires that all construction sites on an acre or greater of land, as well as municipal, industrial and commercial facilities discharging wastewater or stormwater (as noted above in the stormwater section) directly from a point source, such as a pipe, ditch, or channel, into a surface water of the United States must obtain permission under the NPDES permit. All NPDES permits are written to ensure that the surface water receiving discharges will achieve specified water quality standards.

h. State Wastewater Regulations

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water comes into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

The California Department of Public Health sets specific requirements for treated effluent reuse, or recycled water, through Title 22 of the California Code of Regulations (CCR). These requirements are primarily set to protect public health. Title 22 CCR, Division 4, Chapter 3, Sections 60301 through 60355 are used to regulate recycled wastewater and are administered jointly by the California Department of Public Health and the RWQCBs. Title 22 contains effluent requirements for four levels of wastewater treatment, from un-disinfected secondary recycled water to disinfected tertiary recycled water. Higher levels of treatment have higher effluent standards, allowing for a greater number of uses under Title 22, including irrigation of freeway landscaping, pasture for milk animals, parks and playgrounds, and vineyards and orchards for disinfected tertiary recycled water.

California Plumbing Code

The California Plumbing Code is codified in Title 24, CCR, Part 5. The Plumbing Code contains regulations including, but not limited to, plumbing materials, fixtures, water heaters, water supply and distribution, ventilation, and drainage. More specifically, Part 5, Chapter 4, contains provisions requiring the installation of low flow fixtures and toilets. Existing development will also be required to reduce its wastewater generation by retrofitting existing structures with water efficient fixtures (SB 407 [2009] Civil Code Sections 1101.1 et seq.).

i. Local Wastewater Regulations

City of Clovis Municipal Code

Chapter 6.4 of the CMC addresses restrictions, fees, and development related to the public sewer system for the City. CMC Section 6.4.02 stipulates that any building or structure connected to a septic tank or cesspool must be connected to the public sewer system within three years of the sewer becoming available. CMC Section 6.4.03 permits the imposition of charges for sewer connections, including fees to support the construction of sewer mains and house branches extending from the mains to property lines. The specific fee amounts are outlined in the City's Master Development Fee Schedule.

Clovis General Plan

The following goals and policies of the City of Clovis General Plan related to wastewater are applicable to the project.

Public Facilities and Services Element

Policy 1.1: New development shall pay its fair share of public facility and infrastructure improvements.

Policy 1.3: Prior to annexation, the city must find that adequate water supply and service and wastewater treatment and disposal capacity can be provided for the proposed annexation. Existing water supplies must remain with the land and be transferred to the City upon annexation approval.

Policy 1.4: The City may require developments to install onsite or offsite facilities that are in excess of a development's fair share. However, the City shall establish a funding mechanism for future development to reimburse the original development for the amount in excess of the fair share costs

Policy 1.5: Use recycled water to reduce the demands for new water supplies. Support the expansion of recycled water infrastructure throughout Clovis and require new development to install recycled water infrastructure where feasible.

Policy 1.6: Periodically update water, recycled water, wastewater, and stormwater master plans and require all new development to be consistent with the current master plans.

Land Use Element

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

j. Federal Solid Waste Regulations

Title 40 of the Code of Federal Regulations

Title 40 of the CFR, Part 258 (Resource Conservation and Recovery Act RCRA, Subtitle D) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

k. State Solid Waste Regulations

California Department of Resources Recycling and Recovery

California Department of Resources Recycling and Recovery (CalRecycle) oversees, manages, and monitors waste generated in California. CalRecycle provides limited grants and loans to help California cities, counties, businesses, and organizations meet the State waste reduction, reuse, and recycling goals. It also provides funds to clean up solid waste disposal sites and co-disposal sites, including facilities that accept hazardous waste substances and non-hazardous waste. CalRecycle develops, manages, and enforces waste disposal and recycling regulations, including AB 939 and SB 1016, both of which are described below.

Assembly Bill 939

Assembly Bill (AB) 939 (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements as part of the integrated waste management plans. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing and stimulate the purchase of recycled products.

Senate Bill 1016

SB 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. CalRecycle reviews a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Assembly Bill 1826

In October 2014 Governor Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (although multifamily dwellings are not required to have a food waste diversion program). Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. This law phases in the mandatory recycling of commercial organics over time, while also offering an exemption process for rural counties. In particular, the minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

California's Short-Lived Climate Pollutant Reduction Strategy (SB 1383)

Signed into law in September 2016, SB 1383 establishes methane emissions reduction targets for California in a statewide effort to reduce emissions of short-lived climate pollutants. The targets are to reduce organic waste disposal 50 percent by 2020 and 75 percent by 2025. The law also grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. Enforcement of these targets began January 1, 2022.

I. Local Solid Waste Regulations

Countywide Integrated Waste Management Plan

The Countywide Integrated Waste Management Plan (WMP) is mandated by state law under AB 939. The Countywide Integrated WMP outlines the waste management infrastructure for Fresno County and its incorporated cities, including Clovis, Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Mendota, Orange Cove, Parlier, Reedley, San Joaquin, Sanger, and Selma. The plan details countywide infrastructure and administrative processes, summarizes current solid waste management practices, and provides an overview of key elements such as Source Reduction and Recycling, Household Hazardous Waste, and Non-disposal Facilities. It also includes financing information for implementing the Countywide WMP.

City of Clovis Municipal Code

Chapter 6.3, Garbage and Rubbish, of the CMC establishes comprehensive standards for solid waste management and recycling. The CMC outlines regulations governing solid waste collection, residential green waste recycling, landfill liner development fees, and related provisions for waste disposal. Chapter 6.3.1, Recycling and Diversion of Construction and Demolition Debris, specifies requirements for diverting construction and demolition materials from landfills, including diversion thresholds, waste management plans, and reporting obligations. Additionally, Section 9.24.110 prescribes design and construction standards for solid waste and recyclable material storage areas in development projects. Section 9.40.160 introduces developmental and operational standards for recycling facilities, including collection and processing facilities.

Clovis General Plan

The following are relevant policies of the Clovis 2014 General Plan that are related to solid waste regulation in Clovis.

Public Facilities and Services Element

Policy 2.1: Promote solid waste source reduction, reuse, and recycling; composting; and the environmentally-safe transformation of wastes.

Policy 2.2: Meet the state's current and future waste diversion goals through the city's recycling and diversion programs.

Policy 2.3: Increase recycling by commercial, industrial, and multifamily generators.

Policy 2.4: Encourage citywide participation in green waste reduction and household hazardous waste disposal programs.

Policy 2.5: Maintain at least 15 years of ongoing landfill capacity.

Policy 2.6: Protect existing or planned solid waste facilities from encroachment by incompatible land uses that may be allowed through discretionary land use permits or changes in land use or zoning designations

m. Federal and State Telecommunication Regulations

The California Public Utilities Commission (CPUC) develops and implements policies for the telecommunication industry. The Communications Division is responsible for licensing, registration and the processing tariffs of local exchange carriers, competitive local carriers, and non-dominant interexchange carriers. It is also responsible for registration of wireless service providers and franchising of video service providers. The Division tracks compliance with commission decisions and monitors consumer protection and service issues and Commission reliability standards for safe and adequate service. The Communications Division is responsible for oversight and implementation of the six public purpose Universal Service Programs.[15]

4.15.3 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

The analysis in this section focuses on impacts related to water supplies, wastewater, solid waste, and storm water conveyance, as well as electric power, natural gas, or telecommunications facilities. Electric power and natural gas is discussed in greater detail in Section 4.5, *Energy*.

Significance Thresholds

The following thresholds are based on *CEQA Guidelines* Appendix G. For purposes of this EA, impacts related to water supplies, wastewater, solid waste, storm water conveyance, electric power, natural gas or telecommunications facilities are considered significant if implementation of the proposed project would:

[15] Universal Service. CPUC. Accessed October 2025: https://www.cpuc.ca.gov/-/media/cpuc-website/about-cpuc/documents/transparency-and-reporting/fact_sheets/universal_service_v_031723.pdf

1. 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;
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the projects' projected demand in addition to the provider's existing commitments;
4. 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; or
5. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTIL-1 DEVELOPMENT FACILITATED BY THE PROJECT MAY REQUIRE THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WATER, WASTEWATER TREATMENT, STORMWATER DRAINAGE, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS FACILITIES IN CLOVIS. WHILE NEW CONNECTIONS TO EXISTING UTILITY SERVICE SYSTEMS WOULD BE REQUIRED, SUCH CONNECTIONS WOULD NOT RESULT IN DISTURBANCE BEYOND INDIVIDUAL DEVELOPMENT SITES AND ADJACENT INFRASTRUCTURE CORRIDORS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The City's 2014 General Plan EIR evaluates impacts to utilities and service systems resulting from a 2035 population growth scenario and a complete buildout scenario. The 2035 scenario refers to a population increase to 188,224 persons which is higher than the maximum planned population increase of the project to 133,761 residents. The General Plan EIR found the following conclusions regarding impacts to utilities and service systems in the 2035 population growth scenario, separated by utility type including, water, wastewater, storm drainage, solid waste, and all other utilities.

The project would not in and of itself involve any development or significant change to utilities. As discussed in Section 4.11, *Population and Housing*, the additional 1,303 units proposed in the project's Infill Rezone Program would increase the City's population by approximately 3,662 new residents. The maximum potential unit increase is 1,651, leading to a maximum potential population increase of 4,640 residents. In this maximum scenario the population could increase from 129,121 current residents to 133,761 residents, which remains at 45 percent of the City's total buildout capacity of 294,300 analyzed under the 2014 General Plan EIR.[16] The potential additional 4,640 residents that could result from future housing development from in the Infill Rezone Program would only make up 1.6 percent of the overall buildout capacity. This increase would not trigger the need for new utilities or service systems beyond what is currently planned.

[16] City of Clovis. 2014. 2014 General Plan Update EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

Water

The 2014 General Plan EIR found that development could have potentially significant impacts on the ability for the City to have sufficient water supplies.[17] However, in 2020, the City updated its UWMP in accordance with the UWMPA. The purpose of the UWMP is to maintain efficient use of urban water supplies, continue to promote conservation programs and policies, ensure that sufficient water supplies are available for future beneficial use, and provide a mechanism for response during water drought conditions. The UWMP stated that the City is expected to grow by a population of approximately two percent each year, projected to reach a population of approximately 150,000 by the year 2030. This projection is higher than the anticipated maximum population increase to 133,761 residents that could result from increased housing development following the project.

A Water Service Analysis (WSA) was conducted and included as Appendix E of this EA. For Multifamily Residential, the Infill Rezone Program, if developed to maximum buildout would account for 9.6 percent of the total demand in 2030. A summary of the water demand as a result of the project is shown in Table 4.15-4 below.

Table 4.15-4 Planned Water Demand with Infill Rezone Program

Use Type	UWMP 2030 Projection (AF)	Project Demands (AF)	Percent of UWMP MFR Demand
Multi-Family	2,715	259	9.6
Total	**2,715**	**259**	**9.6**

The WSA details that the City's adherence to their planning documents and consistent development of these water supplies and infrastructure is critical for the City's continued growth and development and will provide operational reliability into the future. The WSA concludes that if demand is as projected, the City will have sufficient water to meet dry year demands of all dry year event types. Therefore, impacts to water supplies would be less than significant.

Wastewater

Planned expansions of wastewater treatment facilities, as described in the City's Wastewater Master Plan (for up to 20.7 mgd), would be sufficient to meet the wastewater generation by its 2035 Scenario (19.7 mgd).[18] The Infill Rezone Program would not cause a population increase substantially greater than projected in the 2035 population growth scenario but would place additional usage on existing facilities. Using the conservative estimate of 95 gallons per day for multi-family residential, there would be an additional need for 440,800 gallons per day for the units planned for as a result of the judgment. This would require 20.14 mgd capacity which is below the projected capacity with planned expansions. The change in wastewater demand from the population increase facilitated by the Infill Rezone Program potential future development would not exceed the capacity of the proposed infrastructure. Therefore, impacts to wastewater would be less than significant.

Storm Drainage

The FMFCD service consists of a system of more than 700 miles of pipeline and more than 150 stormwater retention basins. New drainage areas are required when a city expands their SOI. Any

[17] City of Clovis. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php
[18] City of Clovis. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

future project facilitated by the Infill Rezone Program would be within the current City boundary and be subject to meeting current stormwater requirements. Therefore, impacts to storm drainage would be less than significant.

Other Utilities

Other utilities including electricity, natural gas, telephone, and cable would have a less than significant impact in a 2035 scenario as existing and/or proposed facilities would be able to accommodate project-generated utility demands.[19]

For all future housing development projects, developers would be responsible for funding infrastructure improvements that are required to mitigate development impacts and have not been previously identified as part of a capital improvement program covered by development impact fees. Consistent with applicable State law, the City's development fees will ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan (California Government Code Section 66001(g)). All future housing developments would require specific, project-level assessment. Therefore, with implementation of regulations, General Plan policies, and mitigation measures listed in the General Plan EIR, impacts to utilities and service systems would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 DEVELOPMENT FACILITATED BY THE INFILL REZONE PROGRAM WOULD PLACE INCREASED DEMAND ON WATER SUPPLY IN NORMAL AND DROUGHT YEARS. WHILE PROJECTIONS CONSIDERED IN THE UWMP ARE SLIGHTLY LESS THAN THOSE AFFORDED BY IMPLEMENTATION OF THE INFILL REZONE PROGRAM, SUFFICIENT WATER SUPPLY EXISTS TO SERVE THE POPULATION DUE TO CONSERVATION EFFORTS DURING MULTIPLE DRY YEARS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The City's 2014 General Plan EIR evaluates impacts to Utilities and Service Systems resulting from a 2035 population growth scenario and a complete buildout scenario. The 2035 scenario refers to a population increase to 188,224 persons which is higher than the maximum planned population increase of the project to 133,761 residents. The 2020 UMWP projected potable water demand of 65,034 AFY, lower than the General Plan EIRs anticipated demand of 71,798 AFY.

The 2020 UWMP has estimated and shown that it will be able to meet a 2035 demand of 65,034 AFY. The City would have adequate water supply to meet the demand caused by population growth as a result of the Infill Rezone Program. However, future drought and the critically overdrafted status of the Kings Sub-basin creates uncertainty whether the City would be able to secure water supplies greater than those currently forecast for 2035 Buildout Scenario. The City has prepared the

[19] City of Clovis. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

WSCP to address urban water shortage contingencies, pursuant to state law, to promote drought resiliency, even in multiple dry-year scenarios.[20]

The WSCP found that there are sufficient water supplies available to serve the reasonably foreseeable future housing development during normal, dry and multiple dry years with WSCP actions.[21]

The prepared WSA analyzed the Infill Rezone Program project against the UWMP and WSCP and concluded that if demand is as projected, the City will have sufficient water to meet dry year demands of all dry year event types. Therefore, impacts to water supplies during drought conditions would be less than significant.

Mitigation Measures

No mitigation measures are required.

Threshold 3:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-3 DEVELOPMENT FACILITATED THE INFILL REZONE PROGRAM WOULD NOT REQUIRE THE RELOCATION OR CONSTRUCTION OF NEW OR EXPANDED WASTEWATER TREATMENT FACILITIES IN CLOVIS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

By an agreement with the City of Fresno, the City is entitled to 9.3 mgd of wastewater treatment capacity at the RWRF. The City may also acquire additional capacity at the RWRF, if required. Planned expansions of wastewater treatment facilities of the Clovis Water Reuse Facility, as described in the City's Wastewater Master Plan (for up to 20.7 mgd), would itself be sufficient to meet the wastewater generation by its 2035 Scenario (19.7 mgd).[22] Using the same conservative estimate of 95 gallons per day for multi-family residential as the 2014 General Plan EIR, there would be an additional need for 440,800 gallons per day for the units planned for as a result of the Judgment. This would require 20.14 mgd capacity which is below the projected capacity with planned expansions.

The Infill Rezone Program would not cause a population increase substantially greater than projected in the 2035 population growth scenario but would place additional usage on existing facilities. The change in wastewater demand from the population increase facilitated by the Infill Rezone Program would not exceed the capacity of the proposed infrastructure. Therefore, impacts to wastewater would be less than significant.

Mitigation Measures

No mitigation measures are required.

[20] City of Clovis. Water Supply Contingency Plan. 2020. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Water/2020-WSCP-Adopted-July-2021_reduced.pdf?t=202507181312520&t=20250718131252

[22] City of Clovis. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

Threshold 4:	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?
Threshold 5:	Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact UTIL-4 DEVELOPMENT FACILITATED BY THE INFILL REZONE PROGRAM WOULD NOT GENERATE SOLID WASTE IN EXCESS OF STATE OR LOCAL STANDARDS, OR IN EXCESS OF THE CAPACITY OF LOCAL INFRASTRUCTURE. THE PROJECT WOULD NOT IMPAIR THE ATTAINMENT OF SOLID WASTE REDUCTION GOALS AND WOULD COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Three existing facilities could accommodate project-generated solid waste for the 2035 buildout scenario analyzed under the 2024 General Plan EIR and the City's landfill would be able to accommodate at least an additional two decades of solid waste generation after two of the three landfills reach end of life in 2031. The 2014 General Plan policies related to solid waste would help the City meet the state mandated diversion goals in the Integrated Waste Management Act by minimizing the amount of solid waste generated by residents and businesses. Additionally, solid waste disposal within the City limits would continue to be subject to the provisions of the CMC Chapters 6.3 and 6.3.1 and Section 9.24.110.

Additionally, development would be required to comply with General Plan policies which reduce or mitigate impacts on utilities and utility expansion. The solid waste disposal increase as a result of development facilitated by the Infill Rezone Program would have a less than significant impact for local solid waste infrastructure.

Finally, future development as a result of the Infill Rezone Program could lead to the generation of additional solid waste, but not in excess of infrastructure capacity or federal, state, and local standards and reduction goals due to the small increase in population spread across the City.

Mitigation Measures

No mitigation measures are required.

4.15.4 Cumulative Impacts

A project's environmental impacts are "cumulatively considerable" if 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" (*CEQA Guidelines* Section 15065[a][3].).

Water

The analysis provided under Impact UTL-2 and UTIL-3 is cumulative in nature and considers water demand associated with development within the City's PUD service area. Cumulative development within Clovis will continue to increase demands on water supplies. There would be sufficient existing water supplies to accommodate anticipated cumulative development and achieve full buildout of the housing opportunity sites for other nearby cities under normal and dry year conditions by relying on the estimated surplus and implementation of ongoing conservation measures. Therefore, the proposed project would not have a cumulatively considerable contribution to a significant cumulative impact regarding water supply services.

Wastewater

As discussed above under Impact UTIL-1, new wastewater service connections would be installed as needed, on a project-specific basis; this would occur for non-residential developments within the cumulative scenario as it would for residential developments under the proposed project.

Solid Waste

The three existing solid waste facilities could accommodate generated solid waste for the 2035 population growth scenario under the 2014 General Plan growth assumptions. The City of Clovis Landfill would be able to accommodate at least an additional two decades of solid waste generation after two of the three landfills the City uses reach end of life in 2031. Therefore, the proposed project would not have a considerable cumulative impact on solid waste.

Electricity and Natural Gas

The geographic scope for cumulative electricity and natural gas impacts is the PG&E service area of central and northern California. This geographic scope is appropriate because the local providers are responsible for transmitting electricity and natural gas to all land uses within their service areas, including those that would occur on the housing opportunity sites. Development considered part of the cumulative analysis includes buildout of local General Plans.

PG&E is subject to the requirements set forth and/or enforced by the CPUC. The need for electric and natural gas infrastructure would be addressed on a case-by-case basis for each cumulative project, and would be subject to CPUC requirements, similar to those applicable to the proposed project. Therefore, cumulative impacts related to electric power and natural gas transmission facilities would be less than significant. Therefore, the proposed project would not have a cumulatively considerable contribution to a cumulative impact regarding electricity and natural gas.

Telecommunication

The geographic scope for cumulative telecommunications impacts is the telecommunication provider service area. This geographic scope is appropriate because local providers are responsible to provide adequate telecommunication infrastructure to all land uses within its service area, including the housing opportunity sites.

As discussed above under Impact UTIL-1, project implementation requires connections to existing utility infrastructure to meet the needs of site residents and tenants. Cumulative development in the City would increase demand for telecommunications infrastructure. All future development would be required to provide adequate telecommunications infrastructure on a project-by-project basis and would be subject to the same requirements as development projects on the Infill Rezone Program sites. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

Mitigation Measures

No mitigation measures are required.

4.16 Effects Found Not to be Significant

California Environmental Quality Act (CEQA) Guidelines Section 15128 requires the Environmental Assessment (EA) to briefly describe any possible effects that were determined not to be significant and were therefore not discussed in detail in the EA. This section includes the checklist questions listed in Appendix G of the *CEQA Guidelines* and a brief discussion of environmental impacts that were determined to have no impact on the included resources.

4.16.1 Agricultural and Forestry Resources

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?

The City of Clovis is a highly urbanized city, and farmland maps prepared by the California Department of Conservation (CDOC) show that the 20 Infill Rezone Program sites do not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] The Infill Rezone sites are categorized as Farmland of Local Importance, Rural Residential Land of Urban and Built-up Land.

Pursuant to Action Item 4 of the court judgment, the project will amend the land use designation of 20 proposed Infill Rezone Program sites to High or Very High Density Residential and rezone them to the R-3 or R-4 zone districts to support affordable housing units within the city. Since the proposed housing developments would be located on parcels designated for residential use, the project would not impact agricultural or forestry resources. Additionally, the updated Housing Element policies would not affect agricultural lands or forestry areas. The project would not lead to the conversion of farmland to non-agricultural uses, nor would it conflict with existing agricultural zoning or Williamson Act contracts. Furthermore, it would not result in the conversion of forestland, timberland, or timber production zones. Therefore, the project would have no impact on agricultural or forestry resources.

[1] California Department of Conservation. 2025. California Important Farmland Finder. Available: https://maps.conservation.ca.gov/dlrp/ciff/app/#data_s=id%3Awidget_647_output_config_default_geocode_0_0%3A0. Accessed June 2025.

4.16.2 Geology and Soils

Would the project:

a. 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?
   - Strong seismic ground shaking?
   - Seismic-related ground failure, including liquefaction?
   - Landslides?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

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

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

The city of Clovis is not located in an Alquist-Priolo Fault Zone and there are no active faults present in the City of Clovis.[2] Areas of the San Joaquin Valley in Fresno County are not considered conducive to liquefaction due to soil types that are either too coarse or too high in clay content.[3] The topography of the 20 Infill Rezone Program sites is also flat and does not exhibit an elevation that would be conducive to landslide activity.

Although no physical development is included as part of the project, the rezoning of the 20 sites would facilitate development at greater densities. The sites are located on infill properties that are either undeveloped or have existing development with limited structures. The project does not propose development that would involve construction or grading activities in and of itself, and would therefore not result in soil erosion or loss of topsoil. As the topography of the sites are relatively flat and in areas of the city surrounded by existing development, any future development facilitated by the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Nor would any future project require the use of septic or alternative wastewater disposal systems. Therefore, there would be no impact to geology and soils.

[2] City of Clovis. Clovis General Plan EIR. Accessed June 2025: https://cityofclovis.com/planning-and-development/planning/master-plans/general-plan/environmental-impact-report/
[3] Ibid.

4.16.3 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?

The California Geological Survey Mineral Resources Program classifies Mineral Resource Zones (MRZs), or production and consumption lands with identified nonfuel mineral resources (i.e. limestone, gold, silver, copper, sand, gravel, and stone).[4] The City of Clovis is mapped as MRZ-3 by the California Geological Survey, which means the significance of mineral deposits cannot be determined from available data.[5] There are no actively used mineral resources or mining operations within the City of Clovis. There are no mineral resource sectors identified in or near any of the 20 Infill Rezone Program sites. The nearest resource sector is Sector S-11b, 1.1 miles northwest of city limits near the San Joaquin River.[6] Therefore, the project would not interfere with mining operations or the loss of availability of known mineral resources, therefore there would be no impact to mineral resources.

4.16.4 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 concentrations from a wildfire or the uncontrolled spread of a wildfire?
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

There are no Very High Fire Hazard Severity Zones (VHFHZS) within or near the city limits of Clovis.[7] The nearest VHFHSZ is located approximately 50 miles southeast of Clovis. County emergency response plans are updated regularly and would reflect the most recent population estimates and growth projections. Implementation of the project would not substantially impair adopted emergency response or emergency evacuation plans as the proposed Infill Rezone Program sites would be accessed by existing roadways and would not impair the use of emergency evacuation

[4]Mineral Resources Program. Accessed May 2025: https://www.conservation.ca.gov/cgs/minerals/program#:~:text=The%20CGS%20Mineral%20Resources%20Program,mining%20activities%20throughout%20the%20state.
[5] California Division of Mines and Geology. 1999, April 1. Open File Report 99-02: Update of Mineral Land Classification: Aggregate Materials in the Fresno Production-Consumption Region, California
[6] California Division of Mines and Geology. 1999, April 1. Open File Report 99-02: Update of Mineral Land Classification: Aggregate Materials in the Fresno Production-Consumption Region, California
[7] California Department of Forestry & Fire Protection (CALFIRE). 2025. Fire Hazard Severity Zones. Available: https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed June 2025.

routes through the modification of roadways. Therefore, there would be no impact related to wildfire.

Development facilitated by the project would be constructed in accordance with federal, state, regional, and local requirements, which are intended to ensure the safety of residents and structures to the extent feasible. Compliance with these standard regulations would be consistent with the Clovis General Plan Public Facilities and Services Element, Fresno County Local Hazard Mitigation Plan, and the Fresno County Office of Emergency Services.

Future development from the project would be developed in areas of the city zoned for residential development that are not located in a VHFHZS. Development in the city would be required to conform with the latest fire code, including provisions for emergency access. The increase in population associated with the project would not result in significant impacts to evacuation routes or plans in the event of a wildfire, and proposed policies in the Environmental Safety Element and the Public Facilities and Services Element would increase coordination between safety and law enforcement agencies in the event of an emergency.

Additionally, the project would not impair emergency response or evacuation plans and would not involve the installation of infrastructure that may exacerbate fire risk or expose people or structures to significant risks associated with wildfire hazards. Accordingly, there would be no potential impacts.

5 Other CEQA Required Discussions

This section discusses the potential growth-inducing impacts and irreversible environmental impacts associated with the implementation of the proposed project.

5.1 Growth Inducement

Section 15126(d) of the California Environmental Quality Act (CEQA) Guidelines requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

As discussed in Section 4.11, *Population and Housing*, while development facilitated by the proposed project would directly generate population growth, the City of Clovis (City) and the State of California have established the need for additional housing in Clovis. The proposed project would fulfill the requirements of the court judgment of facilitating the development of at least 1,284 housing dwelling units. To meet the objectives of the Regional Housing Needs Allocation (RHNA) carryover of the 4th cycle Housing Element and provide sufficient capacity for housing development, the proposed project specifies Infill Rezone Program sites for residential development and identifies implementation programs and zoning policies to encourage additional housing. Therefore, the proposed project would align with the City's RHNA determination and the State statutory requirements, which are established based on anticipated and desired growth within the city.

Overall, full buildout under the proposed project could facilitate an estimated population growth of approximately 1,303 residential units (up to 1,651 in the maximum potential buildout) and an additional 3,622 residents (up to 4,640 residents) compared to the 2014 Program Environmental Impact Report (PEIR) cumulative assumptions for growth forecasted in the 2014 City's General Plan and Development Code Update. Growth anticipated under the proposed project is intended to meet regional housing needs over the long term, as it includes State-mandated housing goals. The proposed project would be consistent with State requirements for the RHNA. The State requires that all local governments adequately plan to meet the housing needs of their communities. Given that the State is in an ongoing and protracted housing crisis due to an insufficient housing supply, the additional units under the proposed project would further assist in addressing the existing crisis and meeting the housing needs of the City without exceeding planned population growth in the City.

5.1.2 Economic Growth

Development facilitated by the project would generate temporary employment opportunities during construction. Because construction workers would be expected to be from the existing regional work force, project construction would not be growth-inducing from an employment

standpoint. The proposed project would not induce substantial economic expansion to the extent that direct physical environmental effects would result.

5.1.3 Removal of Obstacles to Growth

As discussed in Chapter 2, *Project Description*, the identified sites are to be rezoned for multifamily housing. The Infill Rezone Program sites are located within city limits and can be served by existing infrastructure. As discussed in Section 4.13, *Transportation,* and Section 4.15, *Utilities and Service Systems* of this EA, existing infrastructure would be adequate to serve development facilitated by the Infill Rezone Program. No new water, sewer, or other utility infrastructure would be required, and no new roads would be required. Because the project would facilitate development on undeveloped, underdeveloped and underutilized lots within urbanized areas, project implementation would not remove obstacles for growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(c) requires a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The project would facilitate infill residential development on undeveloped and underdeveloped sites in the City. Construction and operation of development facilitated by the project would involve an irreversible commitment of construction materials and non-renewable energy resources. Development would involve the use of building materials and energy, some of which are non-renewable resources, to construct new residential buildings and associated infrastructure and landscaping. Consumption of these resources would occur with any development in the region and are not unique to the proposed project.

Operation of development facilitated by the project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design would offset this demand to some degree by reducing energy demands of the project. As described in Section 4.5, *Energy*, development facilitated by the project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, *California's Energy Efficiency Standards for Residential and Nonresidential Buildings*) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated residential buildings, and the Green Building Standards Code requires solar access, natural ventilation, and stormwater capture. Consequently, development facilitated by the project would not use unusual amounts of energy or construction materials. Therefore, impacts related to consumption of non-renewable and renewable resources would be less than significant. Consumption of these resources would occur with any development in the region and is not unique to the proposed project.

5.3 Mandatory Findings of Significance

Following each environmental impact discussion in Chapter 4, *Environmental Impact Analysis*, is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure could cause a significant environmental impact in another issue area, this impact is discussed and evaluated as a

secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the project in conjunction with the build-out of the City General Plan.

CEQA Guidelines Section 15065 also requires the following specific Mandatory Findings of Significance be addressed as part of the environmental review for the project:

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;
- Project impacts are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects); and
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly.

Besides air quality, noise, cultural resources, greenhouse gas emissions, public services, and transportation, the impact areas addressed by this Mandatory Findings of Significance section would be less than significant. Potential adverse environmental effects to human beings are discussed in Section 4.2, *Air Quality,* Section 4.4, *Cultural Resources*, Section 4.6, *Greenhouse Gas Emissions*, Section 4.10, *Noise,* and Section 4.13, *Transportation*. Furthermore, as discussed above, each environmental analysis section of the EA concludes with a discussion of the project's contribution to cumulative effects.

The Executive Summary of this EA summarizes all impacts and mitigation measures that apply to the project.

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6 Alternatives

As required by the *California Environmental Quality Act* (*CEQA) Guidelines* Section 15126.6, this chapter examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Chapter 2, *Project Description*, the project objectives are as follows:

- Ensure compliance with the Judgment issued by the Fresno County Superior Court on March 19, 2024, in the *Martinez v. City of Clovis* case, by implementing Action Item 4: Infill Rezone Program.
- Provide capacity to meet the State-required Regional Housing Needs Allocation (RHNA) carryover for lower income households related to the 4th and 5th Cycle Housing Element.
- Ensure that housing development that is affordable to lower income households is achievable, through associated amendments to the Zoning Map of the Development Code.
- Disperse housing sites throughout the City of Clovis (City) to ensure that no single neighborhood or area is overburdened or impacted.
- Encourage the development of additional housing and increase the overall availability of affordable housing by ensuring that development can occur at adequate densities by amending the Land Use Element of the General Plan.

This chapter analyses three alternatives including the required "no project" alternative that involves changes to the project that may reduce the project-related environmental impacts identified in this EA. Considering these alternatives provides a reasonable range of options to aid decision makers and the public in understanding the general implications of revising or eliminating certain components of the Infill Rezone Program.

The following alternatives are evaluated in this EA:

1. Alternative 1: No Project
2. Alternative 2: Alternative Candidate Sites
3. Alternative 3: Reduced Number of Rezone Sites at Higher Densities

Table 6-1 below, provides a summary comparison of the proposed project and each of the alternatives considered. Detailed descriptions of the alternatives and the potential environmental impacts of each alternative are included in the impact analysis sections below. Impacts to be found not significant by the proposed project are found in Section 4.16, *Effects Found Not to be Significant*. Chapter 4, *Environmental Impact Analysis* is comprised of analysis of environmental impact on each identified resource in greater detail.

Table 6-1 Comparison of Project Alternatives' Buildout Characteristics

	Proposed Project	Alternative 1	Alternative 2	Alternative 3
Total maximum housing units	1,651*	95	1,284	1,284
Change in total maximum dwelling units compared to project	N/A	-1,556	-367	-367
Total additional residents (2.81/unit)**	4,640	267	3,608	3,608
Percent change in total population potential over General Plan EIR total buildout scenario (294,000 residents)	1.6	0.09	1.2	1.2

*The project is proposing an assumed density of 1,303 units; however, 1,651 is the maximum potential buildout of the sites under the new zoning designations.

**2.81 residents per housing unit estimate is used by the California Department of Finances Population Estimates for Fresno County.

6.1 Alternative 1: No Project Alternative

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA and as required for the EA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative typically would proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (2) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing zoning and General Plan land use designations on the Infill Rezone Program sites, and assumed full buildout under those existing designations. The analysis of this alternative assumes compliance with applicable City-required development regulations and typical development measures.

6.1.1 Description

The No Project Alternative assumes there is no change in zoning or General Plan land use designations for the 20 Infill Rezone Program sites. The future full buildout of the Infill Rezone Program sites would be controlled by the existing zoning and General Plan land use designations. This assumption assumes that infill residential development might still occur, where allowed, but would fall short of the required 1,284 units.

6.1.2 Impact Analysis

Buildout of the 20 Infill Rezone Program sites under existing zoning would allow for a maximum potential buildout of 95 housing units, or an additional 267 residents, as shown in Table 6-2. This alternative would still allow for additional housing units within the City, approximately 95 units under existing zoning. However, it would not accomplish the objectives identified for the project, pursuant to the Judgment. It would not accomplish the project objectives of at least 1,284 new housing units. Additionally, reduction in maximum allowable density compared to the project as proposed would likely not allow future development to be affordable to lower income households.

Table 6-2 Infill Rezone Program Sites with Current Zoning

Site ID	Existing Zoning	Density Allowance (du/ac)	Min Parcel Size (square feet)	Unit Potential*
3	P-C-C	0	0	0
63	R-1-7500	–	7,500	22
72	R-1-7500	–	7,500	19
108	C-2	0	0	0
110	R-1	2.1	–	3
115	R-1	2.1	–	5
157	P-C-C	0	0	0
161	C-P	0	0	0
167	C-P	0	0	0
168	C-P	0	0	0
197	R-1-AH	–	24,000	8
217	M-1	0	0	0
589	R-A	–	18,000	19
590	R-1	2.1	–	6
592	R-A	–	18,000	5
595	R-1	2.1	–	1
596	R-1	2.1	–	2
597	R-1	2.1	–	1
598	R-1	2.1	–	2
599	R-1	2.1	–	2
Total Units				**95**

du/ac = dwelling units per acre

*unit assumptions are rounded up to the nearest whole number

a. Impacts Compared to Proposed Project

Alternative 1 assumes there would be no change to the existing zoning of the 20 Infill Rezone Program sites. Residential development could still occur on some of these sites; however, impact on environmental resources was analyzed under the 2014 General Plan EIR. Compared to the proposed project, impacts to environmental resources found not to be significant would also not be impacted by Alternative 1.

b. Cumulative Impacts

The proposed project was determined to have a cumulatively considerable contribution to cumulative impacts as discussed in Section 4, *Environmental Impact Analysis*. Alternative 1 would have fewer impacts to resources found significant and unavoidable, including air quality, greenhouse gas (GHG) emissions and noise, compared to the proposed project. This would be a result of development being at a lower density and consistent with development proposed in the City's General Plan. Impacts to biological resources, cultural resources, and tribal cultural resources would be similar to or less than the proposed project as on site land disturbance would still occur

and be subject to the same mitigation measures, similar to the proposed project. Alternative 1 would have fewer impacts to environmental resources than the Infill Rezone Program.

6.2 Alternative 2: Alternative Infill Rezone Program Sites

6.2.1 Description

This alternative assumes there exists an alternative 20 vacant and under-utilized sites across the City that are similar or equal to the 20 Infill Rezone Program sites. Current development standards would similarly be rezoned to allow for increased densities beyond what was analyzed in the 2014 General Plan EIR. Sites would be developed with strictly residential uses, in infill locations, similar to the proposed project. This assumption creates an alternative scenario that would relocate identified project impacts to other parts of the City compared to the proposed project.

Alternative 2 assumes that alternative Infill Rezone Program sites would accommodate the exact number of new dwelling units required by the Judgment, or 1,284 new dwelling units and approximately 3,608 new residents. This would equate to approximately 367 less units and approximately 1,032 less new residents than the maximum of the proposed project. Like the proposed project, this alternative also proposes various amendments to the Zoning Ordinance, General Plan Land Use Element, and ancillary amendments to other planning documents, as necessary for clarification. This alternative would meet the project objectives, however; the proposed Infill Rezone Program sites have been identified in accordance with the Judgment and applicable state housing element law, and any alternative sites would require additional analysis to determine potential compliance with the Judgment and housing element law and would delay the implementation of the project as currently proposed.

6.2.2 Impact Analysis

a. Impacts Compared to Proposed Project

Impacts to environmental resources found not to be significant would also not be impacted by Alternative 2. The impacts under this conceptual alternative, assuming that such sites exist, would have similar environmental impacts as the Infill Rezone Program with a slight reduction in potential residents (around 0.4 percent), but on different and unidentified locations. Identifying alternative sites than those selected for the project would also require revisiting the agreement of the Judgment.

b. Cumulative Impacts

The Infill Rezone Program was determined to have a cumulatively considerable contribution to cumulative impacts as discussed in Section 4, *Environmental Impact Analysis*. Based on the analysis herein, Alternative 2 would have similar impacts to aesthetics, air quality, energy, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services and recreation, transportation, tribal cultural resources, and utilities and service systems as the Infill Rezone Program. Impacts to biological resources, cultural resources, including historical buildings, could have the potential to be greater than the proposed project, as the Infill Rezone Program sites were selected with an effort to avoid these resources.

6.3 Alternative 3: Reduced Sites at Higher Densities

6.3.1 Description

Under Alternative 3, the project would be implemented across a reduced number of sites, at higher densities, in order to meet the project objectives under the Judgment. This alternative conceptualizes the project proceeding with only 10 of the project sites with the largest acreages being included to meet the 1,284 units required by the Judgment. This assumption is made because larger sites might have a greater chance of being developed because the value of the developed sites would be largest and larger parcels allow for more flexible development designs and greater number of units.

This alternative would accommodate the exact number of new dwelling units required by the Judgment, or 1,284 new dwelling units and approximately 3,608 new residents. This would equate to approximately 367 less units and approximately 1,032 less new residents than the maximum of the proposed project. Like the proposed project, this alternative also proposes various amendments to the Zoning Ordinance, General Plan Land Use Element, and ancillary amendments to other planning documents, as necessary for clarification.

6.3.2 Impact Analysis

a. Impacts Compared to Proposed Project

In order to meet the objectives of the project, development across reduced sites would need to be denser with associated higher maximum heights. Table 6-3 below shows an alternative scenario for the project with the largest 10 sites with the required density to meet the unit objective. The 10 sites would all need to be rezoned to R-4 zoning with an assumed 29.2 units per acre, which exceeds the assumed 25.1 units per acre the City believes is a safe assumption for the sites.

Table 6-3 Reduced Infill Rezone Program Sites with Higher Densities

Site No.	Acreage	Assumed units under Alternative 3	Density assumption for Alternative 3 (dwelling units per acre)
3	8.06	235	29.2
63	3.78	110	29.2
72	3.19	93	29.2
115	2.31	67	29.2
157	7.24	211	29.2
197	4.5	131	29.2
217	1.8	53	29.2
589	8.01	234	29.2
590	3.02	88	29.2
592	2.09	61	29.2
Total	**44.00**	**1,284**	

Impact under Alternative 3 would reduce significant impacts on some resources, as development would be facilitated across fewer sites. Impacts to environmental resources found not to be significant or less than significant would also be impacted by Alternative 3, some to a lesser degree. Impacts to aesthetics would be greater due to the larger mass of the buildings at the 10 sites. Additionally, allowing greater densities beyond what is proposed for the Infill Rezone Program sites would require higher densities that may make it difficult or expensive (parking structures) to meet parking requirements. Impacts to land use and planning, and utility service and systems might also have a greater impact than the Infill Rezone Program, as development would place a more concentrated burden on existing facilities potentially beyond what was analyzed under the 2014 General Plan EIR with existing land use designations.

b. Cumulative Impacts

Based on the analysis herein, Alternative 3 would have fewer impacts to air quality, energy, GHG emissions, noise, and transportation than the proposed project since construction would occur across fewer sites and higher density development is more energy efficient. The higher density would likely result in reduced vehicle miles traveled per resident. However, impacts would likely remain significant and unavoidable. Impacts to biological resources, cultural resources, and tribal cultural resources would be similar to or less than the proposed project. Overall, impacts under Alternative 3 would be similar to the proposed project or incrementally greater and significant and unavoidable in terms of aesthetics, but was determined to not be cumulatively considerable.

6.4 Alternatives Considered but Rejected

The following summaries include those alternatives considered, but ultimately rejected for inclusion in the analysis as they would not meet the project objectives, would not substantially reduce impacts compared to the proposed project, or were determined to be infeasible.

- Increase the allowable densities for R-3 and R-4 zones. This alternative was rejected as it would impact all R-3 and R-4 zoned sites, including those already developed, making It difficult to determine the actual increase in housing that this alternative would allow. It would have also concentrated the added housing in the areas of the City already at a higher density, potentially surpassing infrastructure capacity at those locations with the higher density. This alternative was not evaluated to determine if it complies with or satisfies the requirements of the Judgment or the City's housing element.
- Allow residential development in other zones not currently permitted. This has the potential to create incompatible uses such as housing in industrial zones. This alternative was rejected for that reason. Additionally, impacts to infrastructure, such as utilities and service systems, would be far greater in areas not currently supporting residential use.
- Allow an increase in allowable number of accessory dwelling units in residential zones. This would require a substantial number of homeowners (642 at two extra units per lot up to 1,284 at one extra unit per lot) to take advantage of this opportunity in order to reach the required 1,284 additional housing units. It is not reasonable to assume this development would occur; however, the affordability of the alternative sites is less likely to be affordable to lower-income households compared to higher density developments. This alternative was not evaluated to determine if it complies with or satisfies the requirements of the Judgment or the City's housing element.

6.5 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 6-4 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed project for each of the issue areas studied.

Table 6-4 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Alternative Candidate Sites	Alternative 3: Reduced Rezone Sites at Greater Densities
Aesthetics	LTS	+	=	-
Air Quality	SU	-	=	+
Biological Resources	LTSM	+	=/-	+
Cultural Resources	SU	+	=/-	+
Energy	LTS	-	=	+
Greenhouse Gas Emissions	SU	-	=	+
Hazards and Hazardous Materials	LTS	=	=	=
Hydrology and Water Quality	LTS	=	=	+
Land Use and Planning	LTS	=	=	-
Noise	SU	+	=	+
Population and Housing	LTS	+	=	=
Public Services and Recreation	LTS	+	=	=
Transportation	SU	+	=	+
Tribal Cultural Resources	LTSM	=	=	=
Utilities and Service Systems	LTS	+	=	-

NI = No Impact; LTS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and Unavoidable

\+ Superior to the proposed project (reduced level of impact)

\- Inferior to the proposed project (increased level of impact)

= Similar level of impact to the proposed project

Alternative 2 would generally result in similar environmental impacts to all resources compared to the proposed project. Alternative 2 would develop on alternative locations, so impacts to biological, cultural, and tribal resources may experience more significant impact depending on the site selected.

Alternative 3 would reduce the number of Infill Rezone Program sites, therefore, development would need to occur at greater densities than proposed in order to meet the project objectives. This alternative would reduce impacts related to air quality, biological and cultural resources, energy, GHG emissions, hydrology and water quality, noise, and transportation. It has similar impacts to population and housing, public services and recreation, but increase impacts to aesthetics, land use and planning, and utilities and service systems.

Based on the analysis of alternatives in this section, the No Project Alternative 1 would be the environmentally superior alternative as it would lessen the severity of most impacts of the proposed project. Because the No Project Alternative would not generate new population within the City above existing buildout projections, impacts to population and housing, public services and recreation, and utilities and service systems would be eliminated. In addition, significant but mitigable impacts related to aesthetics, air quality, GHG, and noise would be reduced compared to the proposed project. However, this alternative would not meet the project objectives, as it would not increase the opportunities or encourage the development of housing in the City.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* Section 15126.6[e]). However, because the proposed project is necessary to bring the City's housing element into compliance with the Judgment, and this is an EA in accordance with Government Code section 65759, and not an EIR, CEQA does not apply and no such identification of the environmentally superior alternative is required to be made.

Nevertheless, Alternative 3 would be the environmentally superior alternative as it would lessen the severity of the majority of impacts of the proposed project by developing less housing across fewer sites and at greater densities. Impact to resources that are significant and unavoidable would still be considered significant and unavoidable. Alternative 3 would require reaching another agreement to ensure it meets the requirement of the Judgment which would delay the project.

The proposed Infill Rezone Program project would meet all four of the project objectives identified in Chapter 2, *Project Description*, as it would provide a framework for accommodating a total of 1,303 units (maximum of 1,651), which satisfies the 1,284 units required by the court judgment and housing element, and is not substantially more impactful than any of the other alternatives. Therefore, the proposed project is the preferred project, although it is not the environmentally superior alternative.

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7 References

7.1 Bibliography

Executive Summary

Air Quality and Land Use Handbook: A Community Health Perspective. April 2005. Accessible at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf California Air Pollution Control Officers Association (CAPCOA), *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, December, 2021. Accessible at: https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf.

California Code of Regulations, Title 14, § 15126.4(b)(1). (2025). Consideration and discussion of mitigation measures proposed to minimize significant effects. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-9/section-15126-4/

Introduction

None.

Project Description

Court Judgment in *Martinez v. City of Clovis* entered on March 19, 2024. Accessed April 2025: https://www.clovisca.gov/services/planning_development/planning/projects/infill_rezone_program.php#docaccess-54fc38050d7bda918714894e83c3417350ae0a817720abf5d68df687d03f2931

_____ 2014. Land Use Element Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/land_use_element.php (accessed March 2026)

_____ Title 9 Development Code. 2025. Accessed April 2025: https://www.codepublishing.com/CA/Clovis/html/Clovis09/Clovis09.html

Environmental Setting

None.

Aesthetics

California Department of Transportation (Caltrans). 2019. California State Scenic Highway System Map. Accessible at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (accessed April 2025).

_____ List of eligible and officially designated State Scenic Highways. 2024. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways (accessed May 2025)

Clovis, City of. July 5 2006. City of Clovis Design Guidelines. Steven White, P.E.

_____ Clovis Municipal Code. Article 3 (Development and Operational Standards), Division 9.22 (Performance Standards), Section 9.22.050

_____ Clovis Municipal Code. (Exterior Light and Glare). https://www.codepublishing.com/CA/Clovis/#!/Clovis09/Clovis0922.html#9.22.050 (accessed May 2025)

_____ Drought Tolerant Plants. 2008. Accessible at: https://cms2.revize.com/revize/clovis/documents/Services/Public%20Utilities/Parks/Drought-Tolerant-Plant-List.pdf

Air Quality

California Air Resources Board (CARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Available at https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf

_____ 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April. http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf (accessed January 2022)

_____ 2016. Ambient Air Quality Standards. Last Modified May 4, 2016. https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf. (accessed January 2022)

_____. 2025a. Top 4 Summary. https://arb.ca.gov/adam/topfour/topfourdisplay.php

_____. 2025b. Overview: Diesel Exhaust & Health. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health

California Department of Conservation (DOC). 2000. A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos. August. https://ww2.arb.ca.gov/sites/default/files/classic//toxics/asbestos/ofr_2000-019.pdf

California Department of Transportation (Caltrans). 2023. Traffic Census Program. https://dot.ca.gov/programs/traffic-operations/census

California Department of Public Health. 2022. Coccidioidomycosis in California Provisional Monthly Report January-December 2022. December. https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/CocciinCAProvisionalMonthlyReport.pdf

Clovis, City of. 2014. General Plan and Development Code Update Draft Program Environmental Impact Report Volume 1: Draft PEIR and Appendix A (SCH # 2012061069). https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

Los Angeles County Health Department. 2013. Preventing Work-Related Coccidioidomycosis (Valley Fever). Available at http://publichealth.lacounty.gov/acd/docs/ValleyFeverPreventionforWorkFlyer.pdf

San Joaquin Valley Air Pollution Control District (SJVAPCD). 2004. Rule 8021 Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities. Adopted November 15, 2001, Amended August 19, 2004. www.valleyair.org/rules/currntrules/r8021.pdf.

_____ 2015. *Guide for Assessing and Mitigating Air Quality Impacts*, March 19, 2015. https://www.valleyair.org/transportation/GAMAQI-2015/FINAL-DRAFT-GAMAQI.PDF

_____. 2020. 2020 Reasonably Available Control Technology (RACT) Demonstration for the 2015 8-Hour Ozone Standard. Adopted June 18, 2020. https://ww2.valleyair.org/media/3xrdxpvl/2020-ract-demonstration.pdf

_____. 2022. 2022 Plan for the 2015 8-Hour Ozone Standard. Adopted December 15, 2022. https://ww2.valleyair.org/media/0zdlenk3/04-proposed-2022-plan-for-the-2015-8-hour-ozone-standard.pdf

_____. 2023. 2023 Maintenance Plan and Redesignation Request for the Revoked 1-Hour Ozone Standard. Adopted June 15, 2023. https://ww2.valleyair.org/media/itoegkch/03-adopted-2023-maintenance-plan-and-redesignation-request-for-the-revoked-1-hour-ozone-standard.pdf

_____. 2024. 2024 Plan for the 2012 PM2.5 Standards. Adopted June 20, 2024. https://ww2.valleyair.org/media/gw5bacvj/2024-pm25-plan.pdf

_____. 2025. Ambient Air Quality Standards & Valley Attainment Status. https://ww2.valleyair.org/air-quality-information/ambient-air-quality-standards-valley-attainmnet-status/

United States Environmental Protection Agency (USEPA). 2021. “Criteria Air Pollutants.” https://www.epa.gov/criteria-air-pollutants

_____ 2022. Learn About Asbestos. https://www.epa.gov/asbestos/learn-about-asbestos

Biological Resources

California Department of Fish and Wildlife. 2025a. California Natural Diversity Database, Rarefind V. 5.3.0 (accessed April 2025).

_____ 2025c. California Sensitive Natural Communities. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline (accessed April 2025).

_____ 2025b. California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System. http://bios.dfg.ca.gov (accessed April 2025).

_____ 2025c. California Sensitive Natural Communities. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline (accessed April 2025).

_____. 2025b. California Natural Diversity Database (CNDDB) Biogeographic Information and Observation System. http://bios.dfg.ca.gov (accessed April 2025).

CNPS. Rare Plant Program. 2025. Inventory of Rare and Endangered Plants of California (online edition, v9.5.1). California Native Plant Society, Sacramento, CA. http://www.rareplants.cnps.org (accessed April 2025).

Clovis, City of. 2014. Clovis General Plan and Development Code Update Draft PEIR. Prepared by Placeworks. Accessed April 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

_____ 2014. Clovis General Plan and Development Code Update Draft PEIR. Prepared by Placeworks.https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php (Accessed April 2025)

USFWS. 2025a. Information for Planning and Consultation (IPaC). http://ecos.fws.gov/ipac/ (accessed April 2025).

_____ 2025b. Critical Habitat Portal. Retrieved from: http://criticalhabitat.fws.gov (April 2025).

_____ 2025c. National Wetlands Inventory. Retrieved from: http://www.fws.gov/wetlands/ (April 2025).

Cultural Resources

California Public Resources Code, § 5024.1(a). https://california.public.law/codes/public_resources_code_section_5024.1 (Accessed July 2025)

_____ § 5097.5. (2025). Protection of archaeological and historical resources on public lands. Accessible at: https://california.public.law/codes/public_resources_code_section_5097.5

California Code of Regulations, Title 14, § 15126.4(b)(1). (2025). Consideration and discussion of mitigation measures proposed to minimize significant effects. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-9/section-15126-4/

_____ Title 14, § 15064.5(b)(1). (2025). Determining the significance of impacts to archaeological and historical resources. Accessible at: https://regulations.justia.com/states/california/title-14/division-6/chapter-3/article-5/section-15064-5/

California Office of Historic Preservation. 1995:2. Instructions for Recording Historical Resources. Department of Parks and Recreation, Sacramento, California.

City of Clovis. 2014. Draft Program Environmental Impact Report, General Plan and Development Code Update. https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php (Accessed July 2025)

Fresno County Landmarks. 2025. https://www.fresnolandmarks.com/ (Accessed June 2025)

Kroeber, Alfred L. 1925. Handbook of the Indians of California. Bulletin 78, Bureau of American Ethnology, Smithsonian Institution. Government Printing Office, Washington, D.C. Reprinted 1976 by Dover Publications, Inc., New York.

Mithun, Marianne. 2001. The Languages of Native North America. Reprinted. Originally published 1999. Cambridge University Press, New York.

Wallace, William J. 1978. Southern Valley Yokuts." In "California," edited by Robert F. Heizer. *Handbook of North American Indians,* Vol. 8, pp. 448–461. Smithsonian Institution, Washington.

Energy

Alternative Fuels Data Center. U.S. Department of Energy. 2025. Accessed May 2025: https://afdc.energy.gov/stations#/find/nearest?country=US&fuel=BD&location=california

California Air Resources Board (CARB). 2025. Accessible at: https://ww2.arb.ca.gov/our-work/programs/fuels-enforcment-program/california-reformulated-gasoline

California Department of Finance (DOF). Population Estimates for Cities, Counties, and the State 2021-2025. 2023. Accessed June 2025: https://dof.ca.gov/Forecasting/Demographics/Estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2025-with-2020-census-benchmark/

CEC. 2022. Accessed May 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1

_____ 2023. Accessed June 2025: http://www.ecdms.energy.ca.gov/elecbycounty.aspx

_____ 2023. Accessed May 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1

_____ 2022 Integrated Energy Policy Report Update. 2023. Accessed June 2025: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2022-integrated-energy-policy-report

_____ 2024. Accessed June 2025: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0

California Gas and Electric Utilities (CGEU) 2024. Accessed June 2025: https://www.pge.com/pipeline/en/reference-library/regulatory/cgr.html

California Public Resources Code Section 25301[a]). Accessed June 2025: https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=25301

California Fuel Cell Partnership 2025 Accessed May 2025: https://h2fcp.org/stationmap

Department of Finance (DOF). 2023. Accessed May 2025: https://dof.ca.gov/forecasting/demographics/estimates/e-4-population-estimates-for-cities-counties-and-the-state-2021-2025-with-2020-census-benchmark/

U.S. Energy Information Administration (EIA). 2022. State Rankings. Accessed June 2025: https://www.eia.gov/state/rankings/

_____ 2022. Transportation Energy. Accessed June 2025: https://www.eia.gov/energyexplained/use-of-energy/transportation.php

_____ 2023. Accessed June 2025: https://www.eia.gov/state/seds/seds-data-complete.php

_____ 2023. Accessed June 2025: https://www.eia.gov/energyexplained/diesel-fuel/use-of-diesel.php

_____ 2023. Accessed May 2025: https://www.eia.gov/energyexplained/us-energy-facts/data-and-statistics.php

_____ 2023. Accessed June 2025: https://www.eia.gov/state/analysis.php?sid=CA

Environmental Protection Agency & National Highway Traffic Safety Administration. 2012.77 Federal Register [FR] 62624 et seq. October 15, 2012, Table I-1. Accessed July 2025: https://www.govinfo.gov/content/pkg/FR-2012-10-15/pdf/2012-21972.pdf

U.S. Environmental Protection Agency. Location Efficiency and Housing Type. 2011.Accessed May 2025: https://www.epa.gov/sites/default/files/2014-03/documents/location_efficiency_btu.pdf

PG&E. 2022. Accessed June 2025: https://www.pge.com/en/about/corporate-responsibility-and-sustainability/taking-responsibility/clean-energy-solutions.html

PlugShare 2025. https://www.plugshare.com/directory/us/california/clovis (Accessed May 2025)

Greenhouse Gas Emissions

California Air Resources Board (CARB). 2011. Advanced Clean Cars Summary. https://ww2.arb.ca.gov/sites/default/files/2019-12/acc%20summary-final_ac.pdf

_____. 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf

_____. 2020. EMFAC Off-Model Adjustment Factors for Carbon Dioxide (CO2) Emissions to Account for the SAFE Vehicles Rule Part One and the Final SAFE Rule. https://ww2.arb.ca.gov/sites/default/files/2023-02/emfac_off_model_co2_adjustment_factors_06262020-final.pdf

_____. 2021. GHG 1990 Emissions Level & 2020 Limit. https://ww2.arb.ca.gov/ghg-2020-limit

_____. 2022a. 2022 Scoping Plan for Achieving Carbon Neutrality. Adopted November 16, 2022. https://ww2.arb.ca.gov/sites/default/files/2023-04/2022-sp.pdf

_____. 2022b. Appendix D, Local Actions, of the 2022 Scoping Plan for Achieving Carbon Neutrality. https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp-appendix-d-local-actions_0.pdf

_____. 2025. Current California GHG Emission Inventory Data. https://ww2.arb.ca.gov/ghg-inventory-data

California Climate Change Center (CCCC). 2006. Climate Scenarios for California. https://research.fit.edu/media/site-specific/researchfitedu/coast-climate-adaptation-library/united-states/west-coast-amp-hawaix27i/california---statewide/CCCC.--2006.--Climate-Scenarios-for-California.pdf

California Department of Food and Agriculture. 2020. "California Agricultural Production Statistics." https://www.cdfa.ca.gov/statistics/

California Department of Water Resources. 2018. Indicators of Climate Change in California. May 2018. https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf

California Energy Commission (CEC). 2022a. 2022 Building Energy Efficiency Standards. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency

_____. 2022b. 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings: For the 2022 Building Energy Efficiency Standards Title 24, Part 6, and Associated Administrative Regulations in Part 1. https://www.energy.ca.gov/publications/2022/2022-building-energy-efficiency-standards-residential-and-nonresidential

_____. 2022c. Energy Commission Adopts Updated Building Standards to Improve Efficiency, Reduce Emissions From Homes and Businesses. https://www.energy.ca.gov/news/2024-09/energy-commission-adopts-updated-building-standards-expanding-requirements-heat#:~:text=SACRAMENTO%20%E2%80%93%20The%20California%20Energy%20Commission,climate%20and%20public%20health%20goals.

California Natural Resources Agency. 2009. 2009 California Climate Adaptation Strategy. March 2009. http://resources.ca.gov/docs/climate/Statewide_Adaptation_Strategy.pdf

Caltrans. 2022. 2022 Annual Average Daily Traffic. https://dot.ca.gov/programs/traffic-operations/census

Clovis, City of. 2014a. General Plan EIR. https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

_____. 2014b. General Plan. https://www.clovisca.gov/services/planning_development/planning/general_plan/air_quality_element.php

_____. 2023. Active Transportation Plan. https://www.clovisca.gov/services/planning_development/engineering/active_transportation_plan/index.php

Fresno Council of Governments' (FresnoCOG). 2022. 2022 Regional Transportation Plan/Sustainable Communities Strategy. Adopted July 28, 2022. https://www.planfresno.com/sustainable-communities-strategies-fall-outreach/

IPCC. 2021. Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S. L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M. I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T. K. Maycock, T. Waterfield, O. Yelekçi, R. Yu and B. Zhou (eds.)] Cambridge University Press. https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf

National Aeronautics and Space Administration. 2020. "Global Climate Change – Vital Signs of the Planet – Sea Level." https://climate.nasa.gov/vital-signs/sea-level/

National Oceanic and Atmospheric Administration. 2025. "Global Climate Report for Annual 2025" State of the Climate. January 2025. https://www.ncei.noaa.gov/access/monitoring/monthly-report/global/202501

Parmesan, C. August 2006. Ecological and Evolutionary Responses to Recent Climate Change.

San Joaquin Valley Air Pollution Control District (SJVACPD). 2009a. Guidance for Valley Land-us Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA. December.

_____ 2009b. Final Staff Report Addressing Greenhouse Gas Emissions Impacts Under the California Environmental Quality Act. December. https://www.valleyair.org/Programs/CCAP/12-17-09/1%20CCAP%20-%20FINAL%20CEQA%20GHG%20Staff%20Report%20-%20Dec%2017%202009.pdf

State of California. 2018. California's Fourth Climate Change Assessment Statewide Summary Report. August 27, 2018. http://www.climateassessment.ca.gov/state/

U.S. EPA. 2021a. Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gases. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-atmospheric-concentrations-greenhouse-gases

_____. 2021b. Climate Change Indicators: Global Greenhouse Gas Emissions. Last updated April 2021. https://www.epa.gov/climate-indicators/climate-change-indicators-global-greenhouse-gas-emissions

_____. 2021c. Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2019. April 2021. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2019

World Meteorological Organization. 2022. Greenhouse Gases. https://wmo.int/topics/greenhouse-gases

Hazards and Hazardous Materials

California Department of Forestry and Fire, 2025. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0 (accessed September 2025).

City of Clovis. 2014a. General Plan, Environmental Safety and Public Facilities and Services Elements. https://www.clovisca.gov/services/planning_development/planning/projects/general_plan_update/index.php. (Accessed May 2025).

United States Environmental Protection Agency (EPA). 2024. Overview of the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). https://www.epa.gov/asbestos/overview-asbestos-national-emission-standards-hazardous-air-pollutants-neshap (accessed May 2025).

_____.2024a. Learn About Asbsestos. https://www.epa.gov/asbestos/learn-about-asbestos#:~:text=into%20the%20air.-,Health%20Effects%20From%20Exposure%20to%20Asbestos,of%20developing%20harmful%20health%20effects. (accessed May 2025).

_____. 2024b. Learn About Lead. https://www.epa.gov/lead/learn-aboutlead#:~:text=Adults%20exposed%20to%20lead%20can,in%20both%20men%20and%20women). (accessed May 2024).

Department of Toxic Substances Control (DTSC). EnviroStor Database. Accessed October 2025: https://www.envirostor.dtsc.ca.gov/public/search?CMD=search&city=Clovis&zip=&county=&case_number=&business_name=&FEDERAL_SUPERFUND=True&STATE_RESPONSE=True&VOLUNTARY_CLEANUP=True&SCHOOL_CLEANUP=True&CORRECTIVE_ACTION=True&tiered_permit=True&evaluation=True&operating=True&post_closure=True&non_operating=True&inspections=True&inspectionsother=True

Federal Motor Carrier Safety Administration. 2024. National Hazardous Materials Route Registry – By State: California. https://www.fmcsa.dot.gov/regulations/hazardous-materials/national-hazardous-materials-route-registry-state (accessed July 2025).

Fresno Council of Governments. 2023. Fresno County Airport Land Use Compatibility Plan Appendix D. https://www.fresnocog.org/wp-content/uploads/2025/01/Appendix-D-Fresno-Yosemite-Intern9ational-Airport-FAT.pdf.

State Water Resources Control Board (SWRCB). 2025. GeoTracker Database. https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=clovis

Hydrology and Water Quality

California Department of Water Resources (CDW). 2020. California's Groundwater Update 2020. Available: https://data.cnra.ca.gov/dataset/calgw_update2020/resource/d2b45d3c-52c0-45ba-b92a-fb3c90c1d4be. (Accessed May 2025)

California Regional Water Quality Control Board Central Valley Region. 2018. Water Quality Control Plan for the Tulare Lake Basin Third Edition. Available: https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/tularelakebp_201805.pdf (Accessed May 2025)

City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.phphttps://cityofclovis.com/wp-content/uploads/2018/10/Clovis-General-Plan-2014.pdf. (Accessed May 2025)

_____.2021. Urban Water Management Plan 2020 Update. Available: https://www.clovisca.gov/services/public_utilities/water/index.php#docaccess-513243771b4f1a89a630a287eeb11767f2aa5d4613bf20a797e0ac1fb6f18507. Accessed May 2025

_____. 2022. Water Supply Assessment. Available: https://files.ceqanet.lci.ca.gov/284041-1/attachment/gDuLMfphVf0CVi4YLFaTxWXwlFzitTVx4MCkw3XPL1aBFVntkQPWFjBmrJLt9ZOPUYPcyNKKb8oFGlE50. Accessed October 2025.

_____.2025. Water. Available: https://www.clovisca.gov/services/public_utilities/water/index.php

Federal Emergency Management Agency (FEMA). 2025. FEMA Flood Map Service Center. Available: https://msc.fema.gov/portal/search?AddressQuery=Clovis. Accessed June 2025.

Fresno Metropolitan Flood Control District. 2025. Development in Fresno/Clovis. Available: https://www.fresnofloodcontrol.org/development-in-fresno-clovis/ (Accessed June 2025)

Land Use and Planning

California Public Resources Code Sections 21155, 21155.1, 21155.2, 21159.28

City of Clovis. 2014. General Plan. Available: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.phphttps://cityofclovis.com/wp-content/uploads/2018/10/Clovis-General-Plan-2014.pdf. (Accessed May 2025)

Noise

California Department of Transportation (Caltrans). 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. (CT-HWANP-RT-13-069.25.2) https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf (accessed June 2025).

_____. 2020. *Transportation and Construction Vibration Guidance Manual*.: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf (accessed June 2025).

Clovis, City of. 2014a. *City of Clovis General Plan.* https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php (accessed June 2025).

_____. 2014b. City of Clovis General Plan Environmental Impact Report. Accessible from: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.phphttps (accessed June 2025).

_____. 2025. *City of Clovis Municipal Code*. May 12, 2025. Accessible from: https://www.codepublishing.com/CA/Clovis/ (Accessed June 2025)

Crocker, Malcolm J. (Editor). 2007. *Handbook of Noise and Vibration Control Book*, ISBN: 978-0-471-39599-7, Wiley-VCH, October.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf (accessed June 2025).

Kittelson & Associates. 2025. *Transportation Analysis.* June 2025.

Population and Housing

California Department of Finance. E-1 Population and Housing Estimates for Cities, Counties, and the State – January1 2024 and 2025. Accessed June 2025: https://dof.ca.gov/forecasting/demographics/estimates-e1/

_____.E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2025. Accessed June 2025: https://dof.ca.gov/forecasting/demographics/estimates-e1/

California Government Code. § 65589.5..Accessed June 2025: https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201920200SB330^

_____.§ 65583(c)(1). California Legislative Information. Accessed June 2025: https://codes.findlaw.com/ca/government-code/gov-sect-65583/

_____.§ 66300(d). (2023). *California Legislative Information*. Accessed June 2025: https://codes.findlaw.com/ca/government-code/gov-sect-66300/

City of Clovis. General Plan land Use Element Table LU-1. Accessed June 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/land_use_element.php#docaccess-1ccfb3580a11f4c0ae8949222fe6e07fbbc27a6c11e3a0117d8e964f4d6c6cf7

_____.Sixth Cycle Housing Element. 2024. Accessed May 2025: https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php#docaccess-7aed989b23068609d870bcd34c8bbf403c50c07dcbf90d2afd7926d01e63e4f9

Fresno Council of Governments. Fresno County 2023-2060 Growth Projections. Accessed June 2025: https://agendas.fresnocog.org/wp-content/uploads/2024/10/2024-Fresno-COG-2023-2060-Growth-Projections-Draft.pdf

Public Services and Recreation

Clovis, City of. 2014. General Plan. https://www.clovisca.gov/services/planning_development/planning/general_plan/index.php

Clovis Fire Department. SOC and Annual Report. 2023. Accessed October 2025: https://www.clovisca.gov/services/fire/about/soc_annual_report.php

Clovis Unified School District. 2025. School Facilities Needs Analysis. https://files.smartsites.parentsquare.com/6245/clovis_usd_sfna_2025.pdf

Transportation

California Air Pollution Control Officers Association (CAPCOA), Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, December, 2021. Accessible at: https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf

Clovis, City of. Clovis Active Transportation Plan. 2023. Accessible at:, https://www.clovisca.gov/services/planning_development/engineering/active_transportation_plan/index.phpGovernor's Office of Planning and Research. (2018). Technical Advisory on Evaluating Transportation Impacts in CEQA. Sacramento, CA: State of California. Accessible at: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Fresno COG. 2022. Multijurisdictional Local Road Safety Plan. Accessible at:, https://www.fresnocog.org/wp-content/uploads/2022/06/26012_Fresno-COG-MLRSP_Report-FINAL-April-update_Part1-1.pdf

Tribal Cultural Resources

Barton, Amber, Maria Del Carmen Guzman, and Breeann Romo 2010 The Preliminary Results of the 2008 Archaeological Investigations at the Bead Hill Site (KRE-450), Buena Vista Lake, California. SCA Proceedings 24: 1-12.

Davis, James 1961 Trade Routes and Economic Exchange Among the Indians of California. Reports of the University of California Archaeological Survey 54.

Gayton, A.H. 1945 Yokuts and Western Mono Social Organization. American Anthropologist 47(3):409-426.

Kroeber, Alfred L. 1925 Handbook of the Indians of California. Bulletin 78, Bureau of American Ethnology, Smithsonian Institution. Government Printing Office, Washington, D.C. Reprinted 1976 by Dover Publications, Inc., New York.

Mithun, Marianne 2001 The Languages of Native North America. Reprinted. Originally published 1999. Cambridge University Press, New York.

Office of Land Use and Climate Innovation. 2005. Tribal Consultation Guidelines. Available: https://lci.ca.gov/docs/011414_Updated_Guidelines_922.pdf (accessed May 2025).

Sutton, Mark Q., Jille K. Gardner, Kenneth W. Gobalet, and Nancy Valente 2016 "Archaeological Investigations at the Manifold Site (CA-KER-4220), Buena Vista Lake, Southern San Joaquin Valley, California." Pacific Coast Archaeological Society Quarterly, Vol. 52 (4), pp. 15-82.

Rosenthal, Jeffrey, Gregory White, and Mark Sutton. 2007.The Central Valley: A View from the Catbird's Seat. In California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar. AltaMira Press, Lanham Maryland.

Wallace, William J. 1978 "Southern Valley Yokuts." In "California," edited by Robert F. Heizer, pp. 448–461. Handbook of North American Indians, Vol. 8, William C. Sturtevant, general editor, Smithsonian Institution, Washington.

Utilities and Service Systems

California Public Utilities Commission(CPUC). Natural Gas and California. Accessed October 2025: https://www.cpuc.ca.gov/industries-and-topics/natural-gas/natural-gas-and-california

CalRecycle. 2024. Disposal Reporting. Accessible at: https://www2.calrecycle.ca.gov/RecyclingDisposalReporting/Reports/JurisdictionDisposalAndBeneficial

Clovis, City of. 2014. City of Clovis General Plan EIR. Accessible at: https://www.clovisca.gov/services/planning_development/planning/general_plan/environmental_impact_report.php

_____.2020 Urban Water Management Plan Update. 2020. Accessible at: https://www.clovisca.gov/services/public_utilities/water/index.php#docaccess-513243771b4f1a89a630a287eeb11767f2aa5d4613bf20a797e0ac1fb6f18507

_____. Water Supply Contingency Plan. 2020. Accessible at: https://www.clovisca.gov/services/public_utilities/water/index.php#docaccess-e72e52d63e6a743057c5ba29347416d15ea22fbc90c340520384b67e581f21ae

_____.2017. Wastewater Collection System Master Plan. Clovis, CA: City of Clovis

Fresno, City of. Fresno-Clovis Regional Wastewater Reclamation Facility. Accessed November 2025: https://www.fresno.gov/publicutilities/sewer-wastewater/wastewater-facilities-infrastructure/#regional-wastewater-reclamation-facility

Environmental Protection Agency. City of Fresno Reclamation Facility. 2016. Accessed November 2025: https://www.epa.gov/sites/default/files/2016-05/documents/wrrf_fresno_v2_may_12.pdf

Fresno Metropolitan Flood Control District. About Fresno Metropolitan Flood Control District. Accessed October 2025: https://www.fresnofloodcontrol.org/

North Kings Groundwater Sustainability Agency. 2025. 2025 Groundwater Sustainability Plan. Accessible at: https://northkingsgsa.org/groundwater-sustainability-plan/

U.S. Census. 2019. Tarpey Village , CA. Accessible at: https://censusreporter.org/profiles/16000US0677960-tarpey-village-ca/

7.2 List of Preparers

This environmental assessment (EA) was prepared by the City of Clovis, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EA are listed below.

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Appendix A

Air Quality (AQ) 1

City of Clovis Rezone Detailed Report

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8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	City of Clovis Rezone
Construction Start Date	1/1/2026
Operational Year	2031
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	21.4
Location	Clovis, CA, USA
County	Fresno
City	Clovis
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2437
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	1,651	Dwelling Unit	54.3	1,584,960	0.00	0.00	4,623	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	23.1	22.5	29.2	54.7	0.06	1.24	8.35	9.00	1.14	3.96	5.11	—	12,628	12,628	0.35	0.67	26.8	12,861
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	22.6	21.9	27.3	47.6	0.06	1.12	8.35	8.67	1.03	1.98	2.48	—	11,743	11,743	0.44	0.70	0.77	11,963
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	16.0	15.5	17.1	32.5	0.03	0.68	5.89	6.10	0.63	1.40	1.67	—	8,430	8,430	0.26	0.47	8.26	8,585
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.91	2.84	3.12	5.93	0.01	0.12	1.07	1.11	0.11	0.25	0.31	—	1,396	1,396	0.04	0.08	1.37	1,421

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	3.82	3.21	29.2	29.4	0.06	1.24	7.76	9.00	1.14	3.96	5.11	—	6,717	6,717	0.27	0.06	0.41	6,742

2027	5.99	5.62	15.1	52.1	0.04	0.37	7.06	7.43	0.34	1.68	2.02	—	11,536	11,536	0.34	0.63	26.8	11,758
2028	5.71	5.19	14.3	49.5	0.04	0.33	7.06	7.39	0.31	1.68	1.99	—	11,349	11,349	0.34	0.63	24.0	11,568
2029	23.1	22.5	14.7	54.7	0.04	0.32	8.35	8.67	0.30	1.98	2.28	—	12,628	12,628	0.35	0.67	25.0	12,861
2030	22.8	22.2	14.4	51.9	0.04	0.30	8.35	8.65	0.28	1.98	2.26	—	12,426	12,426	0.33	0.42	22.1	12,582
2031	18.3	18.2	7.21	17.0	0.02	0.22	1.38	1.59	0.20	0.32	0.52	—	3,010	3,010	0.09	0.03	2.98	3,024
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	5.79	5.39	27.3	47.6	0.06	1.12	7.06	7.47	1.03	1.68	2.48	—	10,945	10,945	0.41	0.67	0.77	11,155
2027	5.48	4.91	15.8	45.1	0.04	0.37	7.06	7.43	0.34	1.68	2.02	—	10,767	10,767	0.41	0.65	0.70	10,973
2028	5.23	4.69	15.0	42.8	0.04	0.33	7.06	7.39	0.31	1.68	1.99	—	10,596	10,596	0.39	0.65	0.62	10,801
2029	22.6	21.9	15.6	47.3	0.04	0.32	8.35	8.67	0.30	1.98	2.28	—	11,743	11,743	0.44	0.70	0.65	11,963
2030	22.0	21.7	15.0	45.1	0.04	0.30	8.35	8.65	0.28	1.98	2.26	—	11,557	11,557	0.39	0.67	0.57	11,767
2031	21.8	21.5	14.3	43.0	0.04	0.28	8.35	8.64	0.25	1.98	2.23	—	11,381	11,381	0.36	0.65	0.51	11,585
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	2.71	2.32	17.1	20.5	0.03	0.68	2.72	3.39	0.63	1.05	1.67	—	4,465	4,465	0.17	0.10	1.45	4,501
2027	3.95	3.69	11.1	32.5	0.03	0.26	4.97	5.24	0.24	1.18	1.43	—	7,845	7,845	0.26	0.47	8.26	7,999
2028	3.79	3.40	10.5	31.0	0.03	0.24	4.99	5.22	0.22	1.19	1.41	—	7,741	7,741	0.26	0.45	7.43	7,888
2029	11.0	10.5	10.5	32.1	0.03	0.22	5.51	5.73	0.21	1.31	1.52	—	8,165	8,165	0.26	0.46	7.24	8,316
2030	16.0	15.5	10.4	32.4	0.03	0.22	5.89	6.10	0.20	1.40	1.60	—	8,430	8,430	0.26	0.47	6.84	8,585
2031	9.12	9.05	2.83	7.88	0.01	0.07	1.19	1.26	0.06	0.28	0.34	—	1,781	1,781	0.05	0.04	1.18	1,796
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.49	0.42	3.12	3.74	0.01	0.12	0.50	0.62	0.11	0.19	0.31	—	739	739	0.03	0.02	0.24	745
2027	0.72	0.67	2.02	5.93	0.01	0.05	0.91	0.96	0.04	0.22	0.26	—	1,299	1,299	0.04	0.08	1.37	1,324
2028	0.69	0.62	1.91	5.66	0.01	0.04	0.91	0.95	0.04	0.22	0.26	—	1,282	1,282	0.04	0.07	1.23	1,306
2029	2.00	1.92	1.91	5.86	0.01	0.04	1.01	1.05	0.04	0.24	0.28	—	1,352	1,352	0.04	0.08	1.20	1,377
2030	2.91	2.84	1.90	5.92	0.01	0.04	1.07	1.11	0.04	0.25	0.29	—	1,396	1,396	0.04	0.08	1.13	1,421
2031	1.66	1.65	0.52	1.44	< 0.005	0.01	0.22	0.23	0.01	0.05	0.06	—	295	295	0.01	0.01	0.19	297

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	52.9	50.2	28.9	285	0.69	1.28	58.2	59.4	1.24	14.7	16.0	714	81,795	82,508	61.1	2.76	146	85,004
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	44.2	42.1	30.5	135	0.63	1.23	58.2	59.4	1.21	14.7	16.0	714	76,028	76,742	61.0	2.89	14.9	79,145
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	48.4	46.1	29.9	195	0.65	1.25	57.4	58.6	1.23	14.5	15.8	714	77,728	78,442	61.1	2.83	69.7	80,882
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	8.84	8.41	5.46	35.6	0.12	0.23	10.5	10.7	0.22	2.65	2.88	118	12,869	12,987	10.1	0.47	11.5	13,391

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.45	4.90	17.5	186	0.62	0.39	58.2	58.5	0.36	14.7	15.1	—	63,553	63,553	1.12	2.34	135	64,413
Area	45.2	44.7	0.87	94.0	< 0.005	0.04	—	0.04	0.03	—	0.03	0.00	250	250	0.01	< 0.005	—	251
Energy	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	17,849	17,849	1.91	0.11	—	17,931
Water	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Waste	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4

Total	52.9	50.2	28.9	285	0.69	1.28	58.2	59.4	1.24	14.7	16.0	714	81,795	82,508	61.1	2.76	146	85,004
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.34	4.85	20.0	131	0.57	0.39	58.2	58.5	0.36	14.7	15.1	—	58,037	58,037	1.08	2.47	3.50	58,805
Area	36.6	36.6	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	17,849	17,849	1.91	0.11	—	17,931
Water	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Waste	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Total	44.2	42.1	30.5	135	0.63	1.23	58.2	59.4	1.21	14.7	16.0	714	76,028	76,742	61.0	2.89	14.9	79,145
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	6.35	4.84	19.0	144	0.58	0.39	57.4	57.7	0.36	14.5	14.9	—	59,613	59,613	1.10	2.41	58.3	60,418
Area	40.9	40.6	0.43	46.4	< 0.005	0.02	—	0.02	0.02	—	0.02	0.00	124	124	0.01	< 0.005	—	124
Energy	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	17,849	17,849	1.91	0.11	—	17,931
Water	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Waste	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Total	48.4	46.1	29.9	195	0.65	1.25	57.4	58.6	1.23	14.5	15.8	714	77,728	78,442	61.1	2.83	69.7	80,882
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.16	0.88	3.47	26.3	0.11	0.07	10.5	10.5	0.07	2.65	2.72	—	9,870	9,870	0.18	0.40	9.66	10,003
Area	7.46	7.41	0.08	8.46	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	20.4	20.4	< 0.005	< 0.005	—	20.5
Energy	0.22	0.11	1.91	0.81	0.01	0.15	—	0.15	0.15	—	0.15	—	2,955	2,955	0.32	0.02	—	2,969
Water	—	—	—	—	—	—	—	—	—	—	—	22.8	23.5	46.3	0.08	0.05	—	63.4
Waste	—	—	—	—	—	—	—	—	—	—	—	95.3	0.00	95.3	9.53	0.00	—	333
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.88	1.88
Total	8.84	8.41	5.46	35.6	0.12	0.23	10.5	10.7	0.22	2.65	2.88	118	12,869	12,987	10.1	0.47	11.5	13,391

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.44	3.96	3.64	0.01	0.16	—	0.16	0.15	—	0.15	—	657	657	0.03	0.01	—	659

Demoliti	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.08	0.72	0.67	< 0.005	0.03	—	0.03	0.03	—	0.03	—	109	109	< 0.005	< 0.005	—	109
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.03	0.51	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	89.0	89.0	< 0.005	< 0.005	0.31	90.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.42	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	79.1	79.1	< 0.005	< 0.005	0.01	80.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.7	15.7	< 0.005	< 0.005	0.03	16.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.60	2.60	< 0.005	< 0.005	< 0.005	2.64

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.41	0.34	3.20	3.16	0.01	0.14	—	0.14	0.13	—	0.13	—	581	581	0.02	< 0.005	—	583
Dust From Material Movement	—	—	—	—	—	—	0.84	0.84	—	0.43	0.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.58	0.58	< 0.005	0.02	—	0.02	0.02	—	0.02	—	96.1	96.1	< 0.005	< 0.005	—	96.5
Dust From Material Movement	—	—	—	—	—	—	0.15	0.15	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.60	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	104	104	< 0.005	< 0.005	0.36	106
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	10.5	10.5	< 0.005	< 0.005	0.02	10.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.73	1.73	< 0.005	< 0.005	< 0.005	1.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.42	1.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.62	3.04	27.2	27.6	0.06	1.12	—	1.12	1.03	—	1.03	—	6,599	6,599	0.27	0.05	—	6,621
Dust From Material Movement	—	—	—	—	—	—	3.59	3.59	—	1.42	1.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.09	0.92	8.20	8.31	0.02	0.34	—	0.34	0.31	—	0.31	—	1,989	1,989	0.08	0.02	—	1,995

Dust From Material Movement	—	—	—	—	—	—	1.08	1.08	—	0.43	0.43	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	0.17	1.50	1.52	< 0.005	0.06	—	0.06	0.06	—	0.06	—	329	329	0.01	< 0.005	—	330
Dust From Material Movement	—	—	—	—	—	—	0.20	0.20	—	0.08	0.08	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.04	0.68	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	119	119	< 0.005	0.01	0.41	121
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.05	0.55	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	105	105	< 0.005	0.01	0.01	107
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.17	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	32.9	32.9	< 0.005	< 0.005	0.05	33.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.45	5.45	< 0.005	< 0.005	0.01	5.54
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	1.04	1.37	< 0.005	0.04	—	0.04	0.04	—	0.04	—	253	253	0.01	< 0.005	—	254
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.19	0.25	< 0.005	0.01	—	0.01	0.01	—	0.01	—	41.9	41.9	< 0.005	< 0.005	—	42.1
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.33	4.20	3.01	32.9	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,265	6,265	0.26	0.31	0.63	6,364
Vendor	0.18	0.11	3.86	1.69	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,282	2,282	0.05	0.34	0.14	2,386
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.45	0.29	3.54	0.00	0.00	0.67	0.67	0.00	0.16	0.16	—	686	686	0.02	0.03	1.12	697
Vendor	0.02	0.01	0.40	0.17	< 0.005	< 0.005	0.06	0.07	< 0.005	0.02	0.02	—	241	241	0.01	0.04	0.24	252
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.05	0.65	0.00	0.00	0.12	0.12	0.00	0.03	0.03	—	114	114	< 0.005	0.01	0.18	115
Vendor	< 0.005	< 0.005	0.07	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	39.9	39.9	< 0.005	0.01	0.04	41.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.71	9.24	0.02	0.24	—	0.24	0.22	—	0.22	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.16	0.13	1.22	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	4.57	4.47	2.20	37.6	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,910	6,910	0.18	0.28	22.1	7,020
Vendor	0.19	0.12	3.50	1.57	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,229	2,229	0.05	0.33	4.67	2,333
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.07	3.77	2.73	30.5	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,136	6,136	0.26	0.31	0.57	6,235
Vendor	0.18	0.11	3.72	1.64	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,234	2,234	0.05	0.33	0.12	2,333
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.95	2.87	1.75	22.1	0.00	0.00	4.56	4.56	0.00	1.07	1.07	—	4,539	4,539	0.15	0.22	6.82	4,615
Vendor	0.13	0.08	2.60	1.14	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,594	1,594	0.04	0.23	1.44	1,666
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.54	0.52	0.32	4.03	0.00	0.00	0.83	0.83	0.00	0.19	0.19	—	752	752	0.02	0.04	1.13	764
Vendor	0.02	0.02	0.47	0.21	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	264	264	0.01	0.04	0.24	276
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.18	0.99	8.92	12.9	0.02	0.30	—	0.30	0.28	—	0.28	—	2,397	2,397	0.10	0.02	—	2,406
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.85	0.71	6.39	9.26	0.02	0.22	—	0.22	0.20	—	0.20	—	1,717	1,717	0.07	0.01	—	1,723
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.17	1.69	< 0.005	0.04	—	0.04	0.04	—	0.04	—	284	284	0.01	< 0.005	—	285
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.36	4.08	1.94	35.0	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,776	6,776	0.18	0.28	19.9	6,884
Vendor	0.17	0.12	3.40	1.53	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,175	2,175	0.05	0.33	4.12	2,278
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	3.89	3.58	2.48	28.3	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,019	6,019	0.24	0.31	0.52	6,117
Vendor	0.16	0.11	3.61	1.60	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,179	2,179	0.05	0.33	0.11	2,278
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.82	2.60	1.57	20.6	0.00	0.00	4.57	4.57	0.00	1.07	1.07	—	4,465	4,465	0.15	0.20	6.16	4,534
Vendor	0.12	0.08	2.52	1.11	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,559	1,559	0.04	0.23	1.27	1,631
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.52	0.48	0.29	3.77	0.00	0.00	0.83	0.83	0.00	0.20	0.20	—	739	739	0.02	0.03	1.02	751
Vendor	0.02	0.02	0.46	0.20	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	258	258	0.01	0.04	0.21	270
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	1.15	0.97	8.58	12.9	0.02	0.28	—	0.28	0.25	—	0.25	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.82	0.69	6.13	9.22	0.02	0.20	—	0.20	0.18	—	0.18	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.12	1.68	< 0.005	0.04	—	0.04	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	4.10	3.82	1.72	32.7	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,651	6,651	0.16	0.28	17.8	6,756
Vendor	0.16	0.10	3.27	1.50	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,117	2,117	0.05	0.31	3.63	2,215
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	3.68	3.37	2.25	26.4	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	5,909	5,909	0.24	0.31	0.46	6,007
Vendor	0.16	0.09	3.48	1.57	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,121	2,121	0.05	0.31	0.09	2,216
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.65	2.43	1.41	19.1	0.00	0.00	4.56	4.56	0.00	1.07	1.07	—	4,371	4,371	0.13	0.20	5.48	4,439
Vendor	0.12	0.07	2.42	1.09	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,513	1,513	0.04	0.22	1.12	1,582
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.48	0.44	0.26	3.49	0.00	0.00	0.83	0.83	0.00	0.19	0.19	—	724	724	0.02	0.03	0.91	735
Vendor	0.02	0.01	0.44	0.20	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	251	251	0.01	0.04	0.18	262
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.39	12.9	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.12	0.94	8.39	12.9	0.02	0.26	—	0.26	0.24	—	0.24	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.80	0.67	5.99	9.20	0.02	0.19	—	0.19	0.17	—	0.17	—	1,712	1,712	0.07	0.01	—	1,718
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	1.09	1.68	< 0.005	0.03	—	0.03	0.03	—	0.03	—	283	283	0.01	< 0.005	—	284
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	3.89	3.61	1.66	30.4	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	6,533	6,533	0.16	0.08	15.8	6,576
Vendor	0.16	0.10	3.18	1.48	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,056	2,056	0.04	0.31	3.16	2,152
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	3.27	3.16	2.00	24.6	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	5,805	5,805	0.21	0.28	0.41	5,895
Vendor	0.16	0.09	3.38	1.54	0.02	0.03	0.59	0.62	0.03	0.16	0.19	—	2,061	2,061	0.04	0.31	0.08	2,154
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	2.52	2.32	1.23	17.8	0.00	0.00	4.56	4.56	0.00	1.07	1.07	—	4,294	4,294	0.13	0.20	4.88	4,362
Vendor	0.11	0.07	2.36	1.08	0.01	0.02	0.42	0.44	0.02	0.12	0.14	—	1,470	1,470	0.03	0.22	0.98	1,537
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.46	0.42	0.22	3.25	0.00	0.00	0.83	0.83	0.00	0.19	0.19	—	711	711	0.02	0.03	0.81	722
Vendor	0.02	0.01	0.43	0.20	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	243	243	< 0.005	0.04	0.16	254
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.10	0.92	8.12	12.8	0.02	0.24	—	0.24	0.22	—	0.22	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.64	1.01	< 0.005	0.02	—	0.02	0.02	—	0.02	—	188	188	0.01	< 0.005	—	188
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.12	0.18	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	31.1	31.1	< 0.005	< 0.005	—	31.2

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	3.11	3.03	1.74	22.9	0.00	0.00	6.47	6.47	0.00	1.52	1.52	—	5,710	5,710	0.18	0.28	0.36	5,799
Vendor	0.15	0.09	3.29	1.52	0.02	0.03	0.59	0.62	0.02	0.16	0.18	—	1,998	1,998	0.04	0.30	0.07	2,087
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.25	0.24	0.13	1.83	0.00	0.00	0.50	0.50	0.00	0.12	0.12	—	463	463	0.01	0.01	0.47	465
Vendor	0.01	0.01	0.25	0.12	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	156	156	< 0.005	0.02	0.09	163
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.33	0.00	0.00	0.09	0.09	0.00	0.02	0.02	—	76.6	76.6	< 0.005	< 0.005	0.08	77.1
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	25.9	25.9	< 0.005	< 0.005	0.02	27.0
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.19. Paving (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.75	0.63	6.13	9.88	0.01	0.21	—	0.21	0.19	—	0.19	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.75	0.63	6.13	9.88	0.01	0.21	—	0.21	0.19	—	0.19	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.26	2.03	< 0.005	0.04	—	0.04	0.04	—	0.04	—	310	310	0.01	< 0.005	—	311
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.23	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	51.4	51.4	< 0.005	< 0.005	—	51.6
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.36	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	81.1	81.1	< 0.005	< 0.005	0.18	81.6
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.29	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	72.1	72.1	< 0.005	< 0.005	< 0.005	73.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.06	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	15.3	15.3	< 0.005	< 0.005	0.02	15.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.54	2.54	< 0.005	< 0.005	< 0.005	2.55
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.21. Architectural Coating (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipm	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.79	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.33	0.47	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	55.9	55.9	< 0.005	< 0.005	—	56.1
Architectural Coatings	7.01	7.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.01	0.01	0.06	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.26	9.26	< 0.005	< 0.005	—	9.29
Architectural Coatings	1.28	1.28	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.82	0.76	0.34	6.53	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,330	1,330	0.03	0.06	3.56	1,351
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.74	0.67	0.45	5.29	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,182	1,182	0.05	0.06	0.09	1,201
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.28	0.17	2.24	0.00	0.00	0.53	0.53	0.00	0.13	0.13	—	513	513	0.02	0.02	0.64	521
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.05	0.03	0.41	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	84.9	84.9	< 0.005	< 0.005	0.11	86.2
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.23. Architectural Coating (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.78	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.78	1.11	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.09	0.07	0.56	0.79	< 0.005	0.01	—	0.01	0.01	—	0.01	—	95.4	95.4	< 0.005	< 0.005	—	95.7

Architect Coatings	11.9	11.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	15.8	15.8	< 0.005	< 0.005	—	15.8
Architectural Coatings	2.18	2.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.78	0.72	0.33	6.07	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,307	1,307	0.03	0.02	3.16	1,315
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.65	0.63	0.40	4.93	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,161	1,161	0.04	0.06	0.08	1,179
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.50	0.46	0.25	3.56	0.00	0.00	0.91	0.91	0.00	0.21	0.21	—	859	859	0.03	0.04	0.98	872
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.09	0.08	0.04	0.65	0.00	0.00	0.17	0.17	0.00	0.04	0.04	—	142	142	< 0.005	0.01	0.16	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.25. Architectural Coating (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.78	1.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.12	0.10	0.78	1.10	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	16.7	16.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.38	0.54	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	65.8	65.8	< 0.005	< 0.005	—	66.1
Architectural Coatings	8.25	8.25	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.9	10.9	< 0.005	< 0.005	—	10.9
Architectural Coatings	1.51	1.51	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.69	0.67	0.29	5.70	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,285	1,285	0.03	0.02	2.80	1,293
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.62	0.61	0.35	4.58	0.00	0.00	1.29	1.29	0.00	0.30	0.30	—	1,142	1,142	0.04	0.06	0.07	1,160
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.30	0.17	2.30	0.00	0.00	0.63	0.63	0.00	0.15	0.15	—	583	583	0.02	0.01	0.59	586
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.03	0.42	0.00	0.00	0.11	0.11	0.00	0.03	0.03	—	96.6	96.6	< 0.005	< 0.005	0.10	97.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	4,538	4,538	0.73	0.09	—	4,583
Total	—	—	—	—	—	—	—	—	—	—	—	—	4,538	4,538	0.73	0.09	—	4,583

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	4,538	4,538	0.73	0.09	—	4,583
Total	—	—	—	—	—	—	—	—	—	—	—	—	4,538	4,538	0.73	0.09	—	4,583
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	751	751	0.12	0.01	—	759
Total	—	—	—	—	—	—	—	—	—	—	—	—	751	751	0.12	0.01	—	759

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	13,311	13,311	1.18	0.03	—	13,348
Total	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	13,311	13,311	1.18	0.03	—	13,348
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	13,311	13,311	1.18	0.03	—	13,348
Total	1.23	0.61	10.5	4.46	0.07	0.85	—	0.85	0.85	—	0.85	—	13,311	13,311	1.18	0.03	—	13,348
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	0.22	0.11	1.91	0.81	0.01	0.15	—	0.15	0.15	—	0.15	—	2,204	2,204	0.20	< 0.005	—	2,210
Total	0.22	0.11	1.91	0.81	0.01	0.15	—	0.15	0.15	—	0.15	—	2,204	2,204	0.20	< 0.005	—	2,210

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	33.9	33.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	2.72	2.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	8.55	8.09	0.87	94.0	< 0.005	0.04	—	0.04	0.03	—	0.03	—	250	250	0.01	< 0.005	—	251
Total	45.2	44.7	0.87	94.0	< 0.005	0.04	—	0.04	0.03	—	0.03	0.00	250	250	0.01	< 0.005	—	251
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	33.9	33.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	2.72	2.72	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	36.6	36.6	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	6.19	6.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.50	0.50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.77	0.73	0.08	8.46	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	20.4	20.4	< 0.005	< 0.005	—	20.5
Total	7.46	7.41	0.08	8.46	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	20.4	20.4	< 0.005	< 0.005	—	20.5

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Total	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Total	—	—	—	—	—	—	—	—	—	—	—	138	142	280	0.50	0.30	—	383
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	22.8	23.5	46.3	0.08	0.05	—	63.4
Total	—	—	—	—	—	—	—	—	—	—	—	22.8	23.5	46.3	0.08	0.05	—	63.4

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Total	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Total	—	—	—	—	—	—	—	—	—	—	—	576	0.00	576	57.5	0.00	—	2,014
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	95.3	0.00	95.3	9.53	0.00	—	333
Total	—	—	—	—	—	—	—	—	—	—	—	95.3	0.00	95.3	9.53	0.00	—	333

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	11.4	11.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.88	1.88
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.88	1.88

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	4/9/2026	5.00	70.0	—
Site Preparation	Site Preparation	4/10/2026	6/5/2026	5.00	40.0	—
Grading	Grading	6/6/2026	11/7/2026	5.00	110	—

Building Construction	Building Construction	11/8/2026	2/9/2031	5.00	1,110	—
Paving	Paving	2/10/2031	5/26/2031	5.00	75.0	—
Architectural Coating	Architectural Coating	6/1/2029	9/9/2031	5.00	593	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38

Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	7.70	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	20.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	1,189	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	176	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	7.70	LDA,LDT1,LDT2

Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	238	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	3,209,544	1,069,848	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	60.0	0.00	—
Grading	—	—	330	0.00	—

Paving	0.00	0.00	0.00	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005
2029	0.00	204	0.03	< 0.005
2030	0.00	204	0.03	< 0.005
2031	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	0.00	0.00	0.00	0.00	82,317	82,317	82,317	30,045,705

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
3209544	1,069,848	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	8,120,932	204	0.0330	0.0040	41,533,746

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	64,513,896	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	1,068	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	32.1	annual days of extreme heat
Extreme Precipitation	1.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	88.7
AQ-PM	96.7
AQ-DPM	76.2
Drinking Water	47.6
Lead Risk Housing	54.2
Pesticides	0.00
Toxic Releases	64.2
Traffic	44.4
Effect Indicators	—
CleanUp Sites	70.2
Groundwater	0.00
Haz Waste Facilities/Generators	84.8
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	93.4
Cardio-vascular	61.8
Low Birth Weights	82.9
Socioeconomic Factor Indicators	—
Education	53.6
Housing	44.5
Linguistic	34.6
Poverty	75.7
Unemployment	60.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	25.79237777
Employed	68.92082638
Median HI	17.77235981
Education	—
Bachelor's or higher	27.90966252
High school enrollment	100
Preschool enrollment	1.873476197
Transportation	—
Auto Access	19.3763634
Active commuting	31.77210317
Social	—
2-parent households	53.52239189
Voting	27.71718209
Neighborhood	—
Alcohol availability	35.32657513
Park access	59.42512511
Retail density	77.28730912
Supermarket access	36.23764917
Tree canopy	23.29013217
Housing	—
Homeownership	20.76222251
Housing habitability	68.61285769
Low-inc homeowner severe housing cost burden	97.5875786
Low-inc renter severe housing cost burden	65.39201848

Uncrowded housing	74.48992686
Health Outcomes	—
Insured adults	43.11561658
Arthritis	8.9
Asthma ER Admissions	6.6
High Blood Pressure	15.4
Cancer (excluding skin)	15.0
Asthma	27.9
Coronary Heart Disease	9.8
Chronic Obstructive Pulmonary Disease	15.6
Diagnosed Diabetes	40.6
Life Expectancy at Birth	6.8
Cognitively Disabled	26.7
Physically Disabled	11.7
Heart Attack ER Admissions	23.7
Mental Health Not Good	39.0
Chronic Kidney Disease	14.8
Obesity	49.0
Pedestrian Injuries	50.1
Physical Health Not Good	38.5
Stroke	17.3
Health Risk Behaviors	—
Binge Drinking	45.1
Current Smoker	47.6
No Leisure Time for Physical Activity	36.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	82.0
Elderly	17.2
English Speaking	92.8
Foreign-born	4.0
Outdoor Workers	21.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	28.4
Traffic Density	38.4
Traffic Access	0.0
Other Indices	—
Hardship	55.2
Other Decision Support	—
2016 Voting	25.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	78.0
Healthy Places Index Score for Project Location (b)	25.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Consistent with Project Description. Population based on pph of 2.8 (DOF 2025).
Construction: Construction Phases	Conservatively assumes construction occurs in one phase, architectural coating starts in the middle of the building construction phase.
Operations: Hearths	No wood stoves or fireplaces
Operations: Water and Waste Water	WTP 100% aerobic

Appendix B

Air Quality (AQ) 2

City of Clovis Rezone - Site 3 Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	City of Clovis Rezone - Site 3
Construction Start Date	1/1/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	22.6
Location	270 W Herndon Ave, Fresno, CA 93650, USA
County	Fresno
City	Fresno
Air District	San Joaquin Valley APCD
Air Basin	San Joaquin Valley
TAZ	2429
EDFZ	5
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.29

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments Mid Rise	242	Dwelling Unit	8.06	232,320	0.00	0.00	678	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.8	10.5	11.7	21.5	0.03	0.41	1.22	1.63	0.37	0.29	0.66	—	4,106	4,106	0.15	0.12	5.09	4,152
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.7	10.4	29.2	29.3	0.05	1.24	19.8	21.0	1.14	10.1	11.3	—	5,390	5,390	0.22	0.12	0.13	5,410
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.11	3.89	9.21	13.8	0.02	0.34	1.58	1.92	0.31	0.62	0.93	—	2,708	2,708	0.10	0.07	1.19	2,733
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.75	0.71	1.68	2.53	< 0.005	0.06	0.29	0.35	0.06	0.11	0.17	—	448	448	0.02	0.01	0.20	453

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	10.8	10.5	11.7	21.5	0.03	0.41	1.22	1.63	0.37	0.29	0.66	—	4,106	4,106	0.15	0.12	5.09	4,152

Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	10.7	10.4	29.2	29.3	0.05	1.24	19.8	21.0	1.14	10.1	11.3	—	5,390	5,390	0.22	0.12	0.13	5,410
2027	10.6	10.3	11.2	19.7	0.03	0.36	1.22	1.58	0.33	0.29	0.62	—	3,937	3,937	0.16	0.12	0.12	3,978
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	4.11	3.89	9.21	13.8	0.02	0.34	1.58	1.92	0.31	0.62	0.93	—	2,708	2,708	0.10	0.07	1.19	2,733
2027	1.68	1.66	1.16	2.00	< 0.005	0.04	0.10	0.14	0.04	0.02	0.06	—	365	365	0.01	0.01	0.16	368
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.75	0.71	1.68	2.53	< 0.005	0.06	0.29	0.35	0.06	0.11	0.17	—	448	448	0.02	0.01	0.20	453
2027	0.31	0.30	0.21	0.36	< 0.005	0.01	0.02	0.03	0.01	< 0.005	0.01	—	60.4	60.4	< 0.005	< 0.005	0.03	60.9

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11.4	11.1	4.41	36.4	0.06	0.17	3.77	3.94	0.16	0.96	1.12	105	7,403	7,508	9.06	0.33	16.0	7,848
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.66	9.33	4.65	21.6	0.05	0.16	3.77	3.93	0.16	0.96	1.11	105	6,987	7,093	9.11	0.35	2.04	7,426
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.1	9.80	4.38	26.6	0.05	0.16	3.53	3.69	0.16	0.90	1.05	105	6,891	6,997	9.07	0.32	7.56	7,327
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.85	1.79	0.80	4.85	0.01	0.03	0.64	0.67	0.03	0.16	0.19	17.4	1,141	1,158	1.50	0.05	1.25	1,213

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.61	4.40	2.74	22.0	0.05	0.04	3.77	3.80	0.03	0.96	0.99	—	4,728	4,728	0.26	0.26	14.4	4,828
Area	6.64	6.58	0.13	13.7	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	36.7	36.7	< 0.005	< 0.005	—	36.8
Energy	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	2,616	2,616	0.28	0.02	—	2,628
Water	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Waste	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Total	11.4	11.1	4.41	36.4	0.06	0.17	3.77	3.94	0.16	0.96	1.12	105	7,403	7,508	9.06	0.33	16.0	7,848
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.11	3.87	3.11	21.0	0.04	0.04	3.77	3.80	0.03	0.96	0.99	—	4,349	4,349	0.32	0.28	0.37	4,442
Area	5.37	5.37	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Energy	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	2,616	2,616	0.28	0.02	—	2,628
Water	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Waste	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Total	9.66	9.33	4.65	21.6	0.05	0.16	3.77	3.93	0.16	0.96	1.11	105	6,987	7,093	9.11	0.35	2.04	7,426
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3.96	3.75	2.78	19.1	0.04	0.03	3.53	3.56	0.03	0.90	0.93	—	4,236	4,236	0.27	0.26	5.90	4,326
Area	6.00	5.96	0.06	6.78	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	18.1	18.1	< 0.005	< 0.005	—	18.2
Energy	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	2,616	2,616	0.28	0.02	—	2,628
Water	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Waste	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Total	10.1	9.80	4.38	26.6	0.05	0.16	3.53	3.69	0.16	0.90	1.05	105	6,891	6,997	9.07	0.32	7.56	7,327
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.72	0.68	0.51	3.49	0.01	0.01	0.64	0.65	0.01	0.16	0.17	—	701	701	0.05	0.04	0.98	716
Area	1.09	1.09	0.01	1.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	3.00	3.00	< 0.005	< 0.005	—	3.01
Energy	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	433	433	0.05	< 0.005	—	435
Water	—	—	—	—	—	—	—	—	—	—	—	3.45	3.55	7.00	0.01	0.01	—	9.58
Waste	—	—	—	—	—	—	—	—	—	—	—	14.0	0.00	14.0	1.40	0.00	—	48.9
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28
Total	1.85	1.79	0.80	4.85	0.01	0.03	0.64	0.67	0.03	0.16	0.19	17.4	1,141	1,158	1.50	0.05	1.25	1,213

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.72	2.29	20.7	19.0	0.03	0.84	—	0.84	0.78	—	0.78	—	3,427	3,427	0.14	0.03	—	3,438
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	1.13	1.04	< 0.005	0.05	—	0.05	0.04	—	0.04	—	188	188	0.01	< 0.005	—	188
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.02	0.21	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	31.1	31.1	< 0.005	< 0.005	—	31.2
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.42	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	79.1	79.1	< 0.005	< 0.005	0.01	80.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.49	4.49	< 0.005	< 0.005	0.01	4.56
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	3.74	3.14	29.2	28.8	0.05	1.24	—	1.24	1.14	—	1.14	—	5,298	5,298	0.21	0.04	—	5,316
Dust From Material Movement	—	—	—	—	—	—	19.7	19.7	—	10.1	10.1	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.10	0.09	0.80	0.79	< 0.005	0.03	—	0.03	0.03	—	0.03	—	145	145	0.01	< 0.005	—	146
Dust From Material Movement	—	—	—	—	—	—	0.54	0.54	—	0.28	0.28	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	24.0	24.0	< 0.005	< 0.005	—	24.1
Dust From Material Movement	—	—	—	—	—	—	0.10	0.10	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.48	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	92.2	92.2	< 0.005	< 0.005	0.01	93.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.62	2.62	< 0.005	< 0.005	< 0.005	2.66
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	0.44
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.96	1.65	15.0	17.4	0.03	0.65	—	0.65	0.59	—	0.59	—	2,960	2,960	0.12	0.02	—	2,970
Dust From Material Movement	—	—	—	—	—	—	7.08	7.08	—	3.42	3.42	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.82	0.96	< 0.005	0.04	—	0.04	0.03	—	0.03	—	162	162	0.01	< 0.005	—	163
Dust From Material Movement	—	—	—	—	—	—	0.39	0.39	—	0.19	0.19	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.02	0.15	0.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	26.8	26.8	< 0.005	< 0.005	—	26.9
Dust From Material Movement	—	—	—	—	—	—	0.07	0.07	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.04	0.42	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	79.1	79.1	< 0.005	< 0.005	0.01	80.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.49	4.49	< 0.005	< 0.005	0.01	4.56
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	0.76
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.28	1.07	9.85	13.0	0.02	0.38	—	0.38	0.35	—	0.35	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.73	0.61	5.63	7.41	0.01	0.22	—	0.22	0.20	—	0.20	—	1,370	1,370	0.06	0.01	—	1,375
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	0.11	1.03	1.35	< 0.005	0.04	—	0.04	0.04	—	0.04	—	227	227	0.01	< 0.005	—	228
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.74	0.69	0.36	5.97	0.00	0.00	0.95	0.95	0.00	0.22	0.22	—	1,034	1,034	0.03	0.04	3.59	1,052
Vendor	0.03	0.02	0.53	0.24	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	334	334	0.01	0.05	0.78	350
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.64	0.62	0.44	4.83	0.00	0.00	0.95	0.95	0.00	0.22	0.22	—	918	918	0.04	0.04	0.09	933
Vendor	0.03	0.02	0.57	0.25	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	335	335	0.01	0.05	0.02	350
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.38	0.36	0.23	2.81	0.00	0.00	0.53	0.53	0.00	0.13	0.13	—	543	543	0.02	0.03	0.88	553
Vendor	0.01	0.01	0.31	0.14	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.02	—	191	191	< 0.005	0.03	0.19	200
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.07	0.07	0.04	0.51	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	90.0	90.0	< 0.005	< 0.005	0.15	91.5
Vendor	< 0.005	< 0.005	0.06	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	31.6	31.6	< 0.005	< 0.005	0.03	33.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.23	1.03	9.39	12.9	0.02	0.34	—	0.34	0.31	—	0.31	—	2,397	2,397	0.10	0.02	—	2,405
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.07	0.06	0.57	0.78	< 0.005	0.02	—	0.02	0.02	—	0.02	—	145	145	0.01	< 0.005	—	146
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	24.1	24.1	< 0.005	< 0.005	—	24.2
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.60	0.55	0.40	4.47	0.00	0.00	0.95	0.95	0.00	0.22	0.22	—	899	899	0.04	0.04	0.08	914
Vendor	0.03	0.02	0.55	0.24	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	327	327	0.01	0.05	0.02	342
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.04	0.04	0.02	0.28	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	56.5	56.5	< 0.005	< 0.005	0.08	57.5
Vendor	< 0.005	< 0.005	0.03	0.01	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	19.8	19.8	< 0.005	< 0.005	0.02	20.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.36	9.36	< 0.005	< 0.005	0.01	9.51
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	3.28	3.28	< 0.005	< 0.005	< 0.005	3.43
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Paving (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.88	0.74	6.94	9.95	0.01	0.30	—	0.30	0.27	—	0.27	—	1,511	1,511	0.06	0.01	—	1,516
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.38	0.55	< 0.005	0.02	—	0.02	0.02	—	0.02	—	82.8	82.8	< 0.005	< 0.005	—	83.1
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.07	0.10	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	13.7	13.7	< 0.005	< 0.005	—	13.8
Paving	0.00	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.03	0.39	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	77.4	77.4	< 0.005	< 0.005	0.01	78.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.39	4.39	< 0.005	< 0.005	0.01	4.47
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.73	0.73	< 0.005	< 0.005	< 0.005	0.74
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	8.45	8.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	8.45	8.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.26	0.34	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40.0	40.0	< 0.005	< 0.005	—	40.1
Architectural Coatings	2.53	2.53	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.62	6.62	< 0.005	< 0.005	—	6.64
Architectural Coatings	0.46	0.46	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15	0.14	0.07	1.19	0.00	0.00	0.19	0.19	0.00	0.04	0.04	—	207	207	0.01	0.01	0.72	210
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.13	0.12	0.09	0.97	0.00	0.00	0.19	0.19	0.00	0.04	0.04	—	184	184	0.01	0.01	0.02	187
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.02	0.29	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	57.0	57.0	< 0.005	< 0.005	0.09	57.9
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.43	9.43	< 0.005	< 0.005	0.02	9.59

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Architectural Coating (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	8.45	8.45	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.14	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23.3	23.3	< 0.005	< 0.005	—	23.3
Architectural Coatings	1.47	1.47	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.85	3.85	< 0.005	< 0.005	—	3.86
Architectural Coatings	0.27	0.27	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.12	0.11	0.08	0.89	0.00	0.00	0.19	0.19	0.00	0.04	0.04	—	180	180	0.01	0.01	0.02	183
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.01	0.16	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	32.4	32.4	< 0.005	< 0.005	0.05	33.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.37	5.37	< 0.005	< 0.005	0.01	5.46
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.61	4.40	2.74	22.0	0.05	0.04	3.77	3.80	0.03	0.96	0.99	—	4,728	4,728	0.26	0.26	14.4	4,828
Total	4.61	4.40	2.74	22.0	0.05	0.04	3.77	3.80	0.03	0.96	0.99	—	4,728	4,728	0.26	0.26	14.4	4,828
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	4.11	3.87	3.11	21.0	0.04	0.04	3.77	3.80	0.03	0.96	0.99	—	4,349	4,349	0.32	0.28	0.37	4,442
Total	4.11	3.87	3.11	21.0	0.04	0.04	3.77	3.80	0.03	0.96	0.99	—	4,349	4,349	0.32	0.28	0.37	4,442
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.72	0.68	0.51	3.49	0.01	0.01	0.64	0.65	0.01	0.16	0.17	—	701	701	0.05	0.04	0.98	716
Total	0.72	0.68	0.51	3.49	0.01	0.01	0.64	0.65	0.01	0.16	0.17	—	701	701	0.05	0.04	0.98	716

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	665	665	0.11	0.01	—	672
Total	—	—	—	—	—	—	—	—	—	—	—	—	665	665	0.11	0.01	—	672
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	665	665	0.11	0.01	—	672
Total	—	—	—	—	—	—	—	—	—	—	—	—	665	665	0.11	0.01	—	672
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	110	110	0.02	< 0.005	—	111
Total	—	—	—	—	—	—	—	—	—	—	—	—	110	110	0.02	< 0.005	—	111

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,951	1,951	0.17	< 0.005	—	1,957
Total	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,951	1,951	0.17	< 0.005	—	1,957
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartment Mid Rise	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,951	1,951	0.17	< 0.005	—	1,957
Total	0.18	0.09	1.54	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,951	1,951	0.17	< 0.005	—	1,957
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	323	323	0.03	< 0.005	—	324
Total	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	323	323	0.03	< 0.005	—	324

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	4.97	4.97	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.27	1.21	0.13	13.7	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	36.7	36.7	< 0.005	< 0.005	—	36.8
Total	6.64	6.58	0.13	13.7	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	0.00	36.7	36.7	< 0.005	< 0.005	—	36.8
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	4.97	4.97	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.40	0.40	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	5.37	5.37	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00
Consumer Products	0.91	0.91	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.07	0.07	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.11	0.11	0.01	1.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.00	3.00	< 0.005	< 0.005	—	3.01
Total	1.09	1.09	0.01	1.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	0.00	3.00	3.00	< 0.005	< 0.005	—	3.01

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme Mid Rise	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Total	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts Mid Rise	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Total	—	—	—	—	—	—	—	—	—	—	—	20.8	21.5	42.3	0.08	0.05	—	57.9
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts Mid Rise	—	—	—	—	—	—	—	—	—	—	—	3.45	3.55	7.00	0.01	0.01	—	9.58
Total	—	—	—	—	—	—	—	—	—	—	—	3.45	3.55	7.00	0.01	0.01	—	9.58

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts Mid Rise	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Total	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Total	—	—	—	—	—	—	—	—	—	—	—	84.4	0.00	84.4	8.44	0.00	—	295
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	14.0	0.00	14.0	1.40	0.00	—	48.9
Total	—	—	—	—	—	—	—	—	—	—	—	14.0	0.00	14.0	1.40	0.00	—	48.9

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.66	1.66
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments Mid Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.28	0.28

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/1/2026	1/29/2026	5.00	20.0	—
Site Preparation	Site Preparation	1/30/2026	2/13/2026	5.00	10.0	—
Grading	Grading	2/14/2026	3/14/2026	5.00	20.0	—
Building Construction	Building Construction	3/15/2026	1/31/2027	5.00	230	—
Paving	Paving	2/1/2027	3/1/2027	5.00	20.0	—
Architectural Coating	Architectural Coating	8/1/2026	3/30/2027	5.00	172	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Demolition	Excavators	Diesel	Average	3.00	8.00	36.0	0.38
Demolition	Rubber Tired Dozers	Diesel	Average	2.00	8.00	367	0.40
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20

Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	15.0	7.70	LDA,LDT1,LDT2
Demolition	Vendor	—	4.00	HHDT,MHDT
Demolition	Hauling	0.00	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	7.70	LDA,LDT1,LDT2
Site Preparation	Vendor	—	4.00	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	7.70	LDA,LDT1,LDT2
Grading	Vendor	—	4.00	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—

Building Construction	Worker	174	7.70	LDA,LDT1,LDT2
Building Construction	Vendor	25.9	4.00	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	7.70	LDA,LDT1,LDT2
Paving	Vendor	—	4.00	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	34.8	7.70	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	4.00	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	470,448	156,816	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	—	—
Site Preparation	—	—	15.0	0.00	—
Grading	—	—	20.0	0.00	—
Paving	0.00	0.00	0.00	0.00	—

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Apartments Mid Rise	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments Mid Rise	1,316	1,188	990	456,792	5,329	4,810	4,006	1,849,003

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments Mid Rise	—
Wood Fireplaces	0
Gas Fireplaces	0
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	0
Conventional Wood Stoves	0
Catalytic Wood Stoves	0
Non-Catalytic Wood Stoves	0
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
470448	156,816	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments Mid Rise	1,190,349	204	0.0330	0.0040	6,087,926

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments Mid Rise	9,751,632	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments Mid Rise	157	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments Mid Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments Mid Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	31.1	annual days of extreme heat
Extreme Precipitation	1.40	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A

Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	82.5
AQ-PM	96.1
AQ-DPM	71.1
Drinking Water	96.7
Lead Risk Housing	68.2
Pesticides	0.00
Toxic Releases	69.7
Traffic	76.3
Effect Indicators	—
CleanUp Sites	78.3
Groundwater	63.7
Haz Waste Facilities/Generators	74.7
Impaired Water Bodies	23.9
Solid Waste	59.2
Sensitive Population	—
Asthma	94.3
Cardio-vascular	71.5
Low Birth Weights	56.9
Socioeconomic Factor Indicators	—
Education	56.7
Housing	62.4
Linguistic	59.0
Poverty	92.5
Unemployment	86.2

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	10.714744
Employed	48.29975619
Median HI	10.15013474
Education	—
Bachelor's or higher	14.23071988
High school enrollment	100
Preschool enrollment	1.873476197
Transportation	—
Auto Access	22.57153856
Active commuting	47.31168998
Social	—
2-parent households	12.89618889
Voting	2.361093289
Neighborhood	—
Alcohol availability	29.18003336
Park access	13.75593481
Retail density	92.23662261
Supermarket access	87.96355704
Tree canopy	40.66469909
Housing	—
Homeownership	6.172205826
Housing habitability	37.70050045
Low-inc homeowner severe housing cost burden	99.12742205
Low-inc renter severe housing cost burden	39.80495316

Uncrowded housing	26.21583472
Health Outcomes	—
Insured adults	38.36776594
Arthritis	64.8
Asthma ER Admissions	4.6
High Blood Pressure	74.3
Cancer (excluding skin)	87.6
Asthma	7.7
Coronary Heart Disease	51.0
Chronic Obstructive Pulmonary Disease	20.5
Diagnosed Diabetes	31.9
Life Expectancy at Birth	13.9
Cognitively Disabled	6.9
Physically Disabled	21.7
Heart Attack ER Admissions	37.4
Mental Health Not Good	8.5
Chronic Kidney Disease	64.9
Obesity	20.7
Pedestrian Injuries	88.5
Physical Health Not Good	17.6
Stroke	29.9
Health Risk Behaviors	—
Binge Drinking	55.6
Current Smoker	13.8
No Leisure Time for Physical Activity	10.8
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0

Children	25.4
Elderly	77.9
English Speaking	82.2
Foreign-born	32.9
Outdoor Workers	47.7
Climate Change Adaptive Capacity	—
Impervious Surface Cover	43.8
Traffic Density	43.8
Traffic Access	0.0
Other Indices	—
Hardship	83.6
Other Decision Support	—
2016 Voting	3.5

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	96.0
Healthy Places Index Score for Project Location (b)	9.00
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Land Use	Per Table 2-1 from the Project Description. Population based on pph of 2.8.
Construction: Construction Phases	Assumes architectural coating occurs simultaneously as building construction
Operations: Hearths	No fire places or wood stoves
Operations: Water and Waste Water	WTP 100% aerobic

Appendix C

Cultural Resources Technical Report



Clovis Infill Rezone Program Environmental Assessment Project

Cultural Resources Technical Report

prepared for

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Planning Division
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June 2025

RINCON CONSULTANTS

Confidentiality

The following document contains sensitive and confidential information concerning archaeological sites. This report should be held confidential and is not for public distribution. Archaeological site locations are exempt from the California Public Records Act, as specified in Government Code 6254.10, and from the Freedom of Information Act (Exemption 3), under the legal authority of both the National Historic Preservation Act (PL 102-574, Section 304[a]) and the Archaeological Resources Protection Act (PL 96-95, Section 9[a]). Sections of this report contain maps and other sensitive information. Distribution should be restricted appropriately.

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Appendices

Appendix A CHRIS Records Search Results [CONFIDENTIAL]
Appendix B NAHC Sacred Lands File Results [CONFIDENTIAL]

Executive Summary

The City of Clovis (City) retained Rincon Consultants Inc. (Rincon) to conduct a cultural resources study in support of the preparation of an Environmental Assessment (EA) for the City of Clovis Infill Rezone Program Project (project) in the City of Clovis, Fresno County, California. This study has been conducted in conformance with California Government Code Section 65759 to evaluate an increased capacity for affordable housing dwelling units in Clovis.

This study documents the methods and results of a cultural resources records search of the California Historical Resources Information System (CHRIS), a Sacred Lands File (SLF) search, and background research for each rezone site to analyze constraints for potential future development.

The field survey and background research identified two previously evaluated built environment resources: Helm Colonial Ditch (P-10-005511/CA-FRE-3344H) and Jefferson Canal (P-10-006140/CA-FRE-3615H). Both have been evaluated and determined ineligible for listing in the NRHP and CRHR, and therefore, are not historical resources as defined by CEQA Section 15064.5(a). Research also identified 11 rezone sites that include built environment resources that have not been previously evaluated for NRHP or CRHR eligibility. Although the project includes rezoning and amending the land use designations, and there are no specific development associated with the project, implementation of the project would guide future development. Potential future development facilitated by the project may include site preparation, demolition, and construction activities and could have the potential to result in the physical demolition, destruction, relocation, or alteration of potential historical resources. Historic-aged buildings, as well as parcels with buildings that may become age-eligible with the passage of time, may require further evaluation to determine if they are historical resources pursuant to CEQA and may be affected by a future project. Therefore, there is potential to impact historical resources.

This study did not identify any previously recorded archaeological resources in any of the proposed rezone sites. However, only one rezone site (157) has been previously surveyed, which took place in 2002. In addition, seven rezone sites are considered to have moderate to high potential for subsurface archaeological deposits. The absence of previously recorded prehistoric or historic-period archaeological resources within the immediate vicinity of the remaining rezone sites, along with the existing level of disturbance, suggests there is a low potential for encountering intact subsurface archaeological deposits. However, as these sites have not been previously studied, lack of evidence and sensitivity does not preclude the existence of archaeological resources within these rezone sites. Therefore, future development of any rezone site would have the potential to directly or indirectly impact subsurface archaeological resources through ground disturbing activities associated with construction. Rincon presents recommended mitigation measures for updated archaeological resources study and unanticipated archaeological resources to reduce impacts to less than significant levels.

1 Introduction

The City of Clovis (City) retained Rincon Consultants Inc. (Rincon) to conduct a cultural resources study in support of the preparation of an Environmental Assessment (EA) for the City of Clovis Infill Rezone Program Project (project) in the City of Clovis, Fresno County, California. This technical report documents the methods and results a cultural resources records search, archival and background research, and a Sacred Lands File (SLF) search. This study has been conducted in conformance with California Government Code Section 65759 to evaluate an increased capacity for affordable housing dwelling units in Clovis.

1.1 Project Site and Description

The project site includes 20 individual properties totaling 54 acres within the city of Clovis, Fresno County, California (Figure 1). The 20 rezoning sites are dispersed throughout the City and are largely vacant or are underutilized with low density residential development. Detailed information for each individual property, including Assessor's Parcel Number (APN), Quadrangle, Township, Range, and Section is included in Table 1.

The City is initiating the project as part of the City of Clovis v. Martinez Settlement Agreement and General Release (Settlement Agreement), effective February 20, 2024. The project consists of the rezoning of the 20 individual properties (Figure 2) and amending the land use designations of those properties. In order to ensure adequate sites to meet the City's Regional Housing Needs Allocation (RHNA) goals for lower income households, the rezoning of the 20 infill properties (rezoning sites) is necessary to provide sufficient housing development at locations that are adequate for accommodating lower income households. Amendments are to be made to the Land Use Element Map of the City of Clovis General Plan (2014) and revisions to the Zoning Map in the Title 9 Development Code of the Clovis Municipal Code. The process is separate from the 6th Cycle Housing Element Rezone Program.

Table 1 Rezone Site Locational Information

Site ID	Address	APN	Quadrangle	Township	Range	Section
3	270 W Herndon Ave	49102042	Clovis	13S	21E	6
63	1933 Alluvial Ave	56303207	Clovis	12S	21E	33
72	437 W Nees Ave	56008207	Clovis	12S	21E	30
108	125 & 135 N Clovis Ave	49123124	Clovis	13S	21E	4
110	236 & 256 W Santa Ana Ave	49906074	Clovis	13S	21E	17
115	1671 Leonard Avenue	55457044S	Clovis	13S	21E	12
157	None	55803359S	Clovis	12S	21E	26
161	2930 Willow Ave	43043316	Clovis	13S	21E	18
167	1871 Shaw Ave	55128004	Clovis	13S	21E	10
168	1853 Shaw Ave	55128003	Clovis	13S	21E	10
197	1497 N Locan Ave	55849230	Clovis	12S	21E	26
217	885 Gettysburg Ave	49954013ST	Clovis	13S	21E	16
589	2403 Bullard Ave	55026023	Clovis	13S	21E	3
590	3959 Shaw Ave	55458036s	Clovis	13S	21E	12
592	1160 N Fowler Ave	56303131	Clovis	12S	21E	33
595	939 & 947 Sunnyside Ave	49817202	Clovis	13S	21E	9
596	965 & 975 Sunnyside Ave	49817201	Clovis	13S	21E	9
597	925 Sunnyside	49817203	Clovis	13S	21E	9
598	2560 Fowler Ave	49938442	Clovis	13S	21E	16
599	2612 Fowler Ave	49938441	Clovis	13S	21E	16

1.1.1 Rezoning Sites

The following sections include details on the size and current use of the property, existing and proposed zoning and land use designations, and the number of housing units the site is assumed to accommodate pursuant to the settlement agreement. Table 2 details the unit potential for sites at both the maximum and assumed densities.

Table 2 Rezoning Sites

Site ID*	APN	Address	Size (Acres)	Vacant?	Existing General Plan Designation	Existing Zone	Existing Use
3	49102042	270 W Herndon Avenue	8.06	No	GC	R-A	Single-family residence; Sports facility; Tree lot
63	56303207	1933 Alluvial Ave	3.78	No	L	R-1-7500	Single family residence
72	56008207	437 W Nees Ave	3.19	No	L	R-1-7500	Single family residence
108	49123124	125 & 135 N Clovis Ave	1.25	Yes	GC	C-2	Vacant
110	49906074	236 & 256 W Santa Ana Ave	1.25	Yes	M	R-1	Vacant
115	55457044S	1671 Leonard Ave	2.31	Yes	M	R-1	Vacant
157	55803359S	De Wolf & Richmond Ave	7.24	Yes	MU-V	P-C-C	Vacant
161	43043316	2930 Willow Ave	1.67	Yes	O	C-P	Vacant
167	55128004	1871 Shaw Ave	1.04	Yes	O	C-P	Vacant
168	55128003	1853 Shaw Ave	1.3	Yes	O	C-P	Vacant
197	55849230	1497 N Locan Ave	4.5	No	VL	R-1-AH	Single family residence
217	49954013ST	885 Gettysburg Ave	1.8	No	I	M-1	Clovis Academy of Gymnastics & Dance
589	55026023	2403 Bullard Ave	8.01	No	L	R-A	Former Rogers Helicopter
590	55458036s	3959 Shaw Ave	3.02	No	M	R-1	Single-family residence
592	56303131	1160 N Fowler Ave	2.09	No	L	R-A	Single family residence
595	49817202	939 & 947 Sunnyside Ave	0.41	Yes	L	R-1	Vacant
596	49817201	965 & 975 Sunnyside Ave	0.72	Yes	L	R-1	Vacant
597	49817203	925 Sunnyside	0.41	No	L	R-1	Single family residence
598	49938442	2560 Fowler Ave	1.09	No	L	R-1	Single family residence
599	49938441	2612 Fowler Ave	1.18	No	L	R-1	Single family residence
Total			**54.32**				

Land Use Designations: GC = General Commercial; L = Low Density Residential; M = Medium Density Residential; MU-V = Mixed Use Village; O = Office; VL = Very Low Density Residential; I = Industrial

Zoning Districts: R-A & R-1-AH = Single Family Residential Very Low Density; R-1 & R-1-7500 = Single Family Residential Low Density Residential; C-2 = Community Commercial; P-C-C = Planned Commercial Center; C-P = Administrative and Professional Office; M-1 = Light Industrial

Rezone Site 3

Rezone Site 3 is located at 270 W Herndon Avenue, Clovis, California. The property is currently zoned R-A with a land use designation of 'General Commercial.' The project proposes the site be rezoned to R-3 with a new land use designation of 'High Density Residential.' The 8.06-acre site currently has one existing single-family residence, one existing commercial structure, and a tree lot, and is assumed to accommodate 193 units under the new zoning.

Rezone Site 63

Rezone Site 63 is located at 1933 Alluvial Avenue, Clovis, California. The property is currently zoned R-1-7500 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R- 3 with a new land use designation of 'High Density Residential.' The 3.78-acre site currently has one existing residence and is assumed to accommodate 91 units under the new zoning.

Rezone Site 72

Rezone Site 72 is located at 437 West Nees Avenue, Clovis, California. The property is currently zoned R-1-7500 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' The 3.19-acre site currently has one existing single-family residence and is assumed to accommodate 77 units under the new zoning.

Rezone Site 108

Rezone Site 108 is located at 125 & 135 North Clovis Avenue, Clovis, California. The property is currently zoned C-2 with a land use designation of 'General Commercial.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' The 1.25-acre site is currently vacant and is assumed to accommodate 30 units under the new zoning.

Rezone Site 110

Rezone Site 110 is located at 236 & 256 West Santa Ana Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Medium Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 1.25-acre site is currently vacant and is assumed to accommodate 30 units under the new zoning.

Rezone Site 115

Rezone Site 115 is located at 1671 Leonard Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Medium Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 2.31-acre site is currently vacant and is assumed to accommodate 55 units under the new zoning.

Rezone Site 157

Rezone Site 157 is located at intersection of De Wolf Avenue and Richmond Avenue in Clovis, California. Currently zoned P-C-C with a General Plan land use designation of 'Mixed Use-Village,' is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 7.24-acre site is currently vacant and is assumed to accommodate 174 units under the new zoning.

Rezone Site 161

Rezone Site 161 is located at 2930 Willow Avenue, Clovis, California. The property is currently zoned C-P with a land use designation of 'Office.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 1.67-acre site is currently vacant and is assumed to accommodate 40 units under the new zoning.

Rezone Site 167

Rezone Site 167 is located at 1871 Shaw Avenue, Clovis, California. The property is currently zoned C-P with a land use designation of 'Office.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential,' This 1.04-acre site is currently vacant and is assumed to accommodate 25 units under the new zoning.

Rezone Site 168

Rezone Site 168 is a located at 1853 Shaw Avenue, Clovis, California. The property is currently zoned C-P with a land use designation of 'Office.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 1.3-acre site currently vacant and is assumed to accommodate 31 units under the new zoning.

Rezone Site 197

Rezone Site 197 is located at 1497 North Locan Avenue, Clovis, California. The property is currently zoned R-1-AH with a land use designation of 'Very Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 4.5-acre site currently has one existing rural residence and is assumed to accommodate 108 units under the new zoning.

Rezone Site 217

Rezone Site 217 is located at 885 Gettysburg Avenue, Clovis, California. The property is currently zoned M-1 with a land use designation of 'Industrial.' Approximately 1.8 acres of the property is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' The 4.0-acre site currently has one existing business, Clovis Academy of Gymnastics & Dance, and is assumed to accommodate 43 units under the new zoning.

Rezone Site 589

Rezone Site 589 is located at 2403 Bullard Avenue, Clovis, California. The property is currently zoned R-A with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 8.01-acre site currently has the remains of a former helicopter business, Rogers' Helicopter, and is assumed to accommodate 192 units under the new zoning.

Rezone Site 590

Rezone Site 590 is located at 3959 Shaw Ave, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Medium Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 3.02-acre site currently has one single-family residence, and is assumed to accommodate 72 units under the new zoning.

Rezone Site 592

Rezone Site 592 is located at 1160 North Fowler Avenue, Clovis, California. The property is currently zoned R-A with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 2.09-acre site currently has one existing rural residence and is assumed to accommodate 50 units under the new zoning.

Rezone Site 595

Rezone Site 595 is located at 939 & 947 Sunnyside Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-4 with a new land use designation of 'Very High Density Residential.' This 0.41-acre site is currently vacant and is assumed to accommodate 10 housing units under the new zoning.

Rezone Site 596

Rezone Site 596 is located at 965 & 975 Sunnyside Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-4 with a new land use designation of 'Very High Density Residential.' This 0.72-acre site is currently vacant and is assumed to accommodate 18 units under the new zoning.

Rezone Site 597

Rezone Site 597 is located at 925 Sunnyside Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-4 with a new land use designation of 'Very High Density Residential.' This 0.41-acre site previously had an existing residence that was demolished in early 2025 and is assumed to accommodate 10 units under the new zoning.

Rezone Site 598

Rezone Site 598 is located at 2560 Fowler Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 1.09-acre site currently has an existing residence and is assumed to accommodate 26 housing units under the new zoning.

Rezone Site 599

Rezone Site 599 is located at 2612 Fowler Avenue, Clovis, California. The property is currently zoned R-1 with a land use designation of 'Low Density Residential.' It is proposed to be rezoned to R-3 with a new land use designation of 'High Density Residential.' This 1.18-acre site currently has an existing residence and is assumed to accommodate 28 units under the new zoning.

1.2 Personnel

Rincon Senior Archaeologist, Elaine Haynes, MA, Registered Professional Archaeologist (RPA), provided management oversight for this cultural resources study. Ms. Haynes meets the Secretary of the Interior's Professional Qualifications Standards for historic and prehistoric archaeology (National Park Service 1983). Archaeologist Alli Berry performed the cultural resources records search, completed the Native American outreach for this project, and is a contributing author on this report. Geographic Information Systems Analyst Kaylee Herbold prepared the figures found in this report. Principal Margo Nayyar, MA reviewed this report for quality assurance and control.

Figure 1 Regional Location

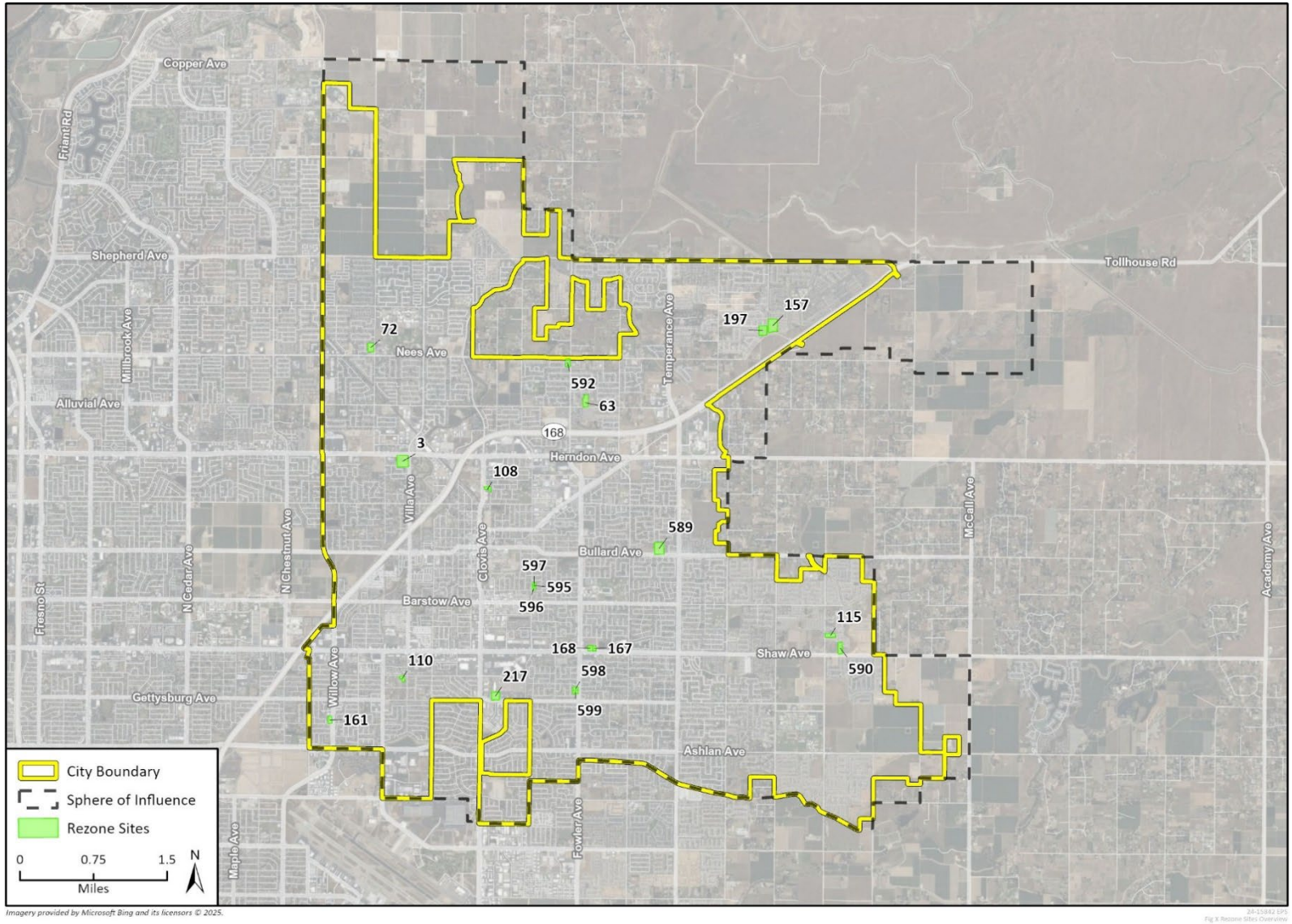


Figure 2a Rezone Site 3



Figure 2b Rezone Site 63



Figure 2c Rezone Site 72



Figure 2d Rezone Site 108



Figure 2e Rezone Site 110



Figure 2f Rezone Sites 115 and 550

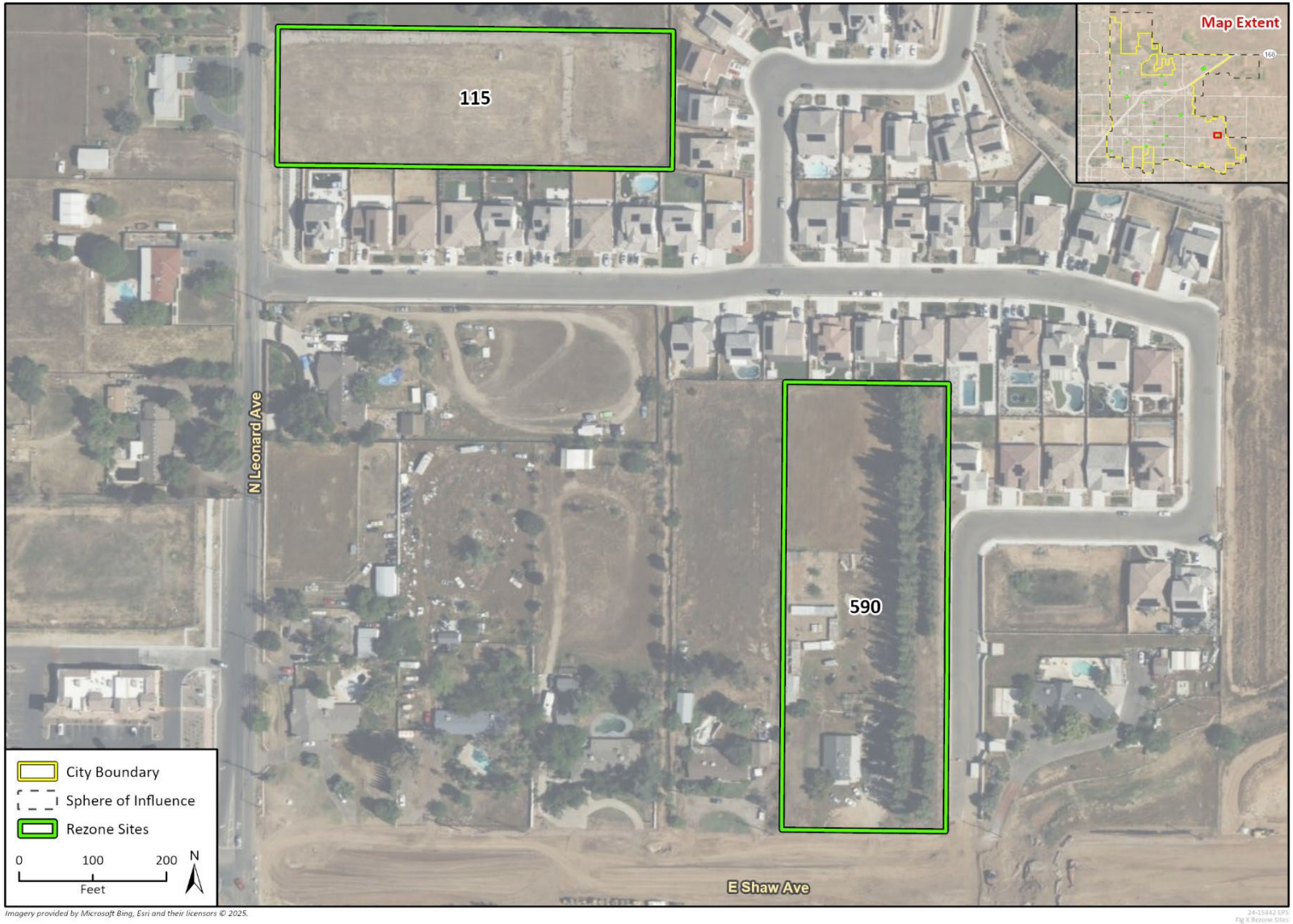


Figure 2g Rezone Sites 157 and 197

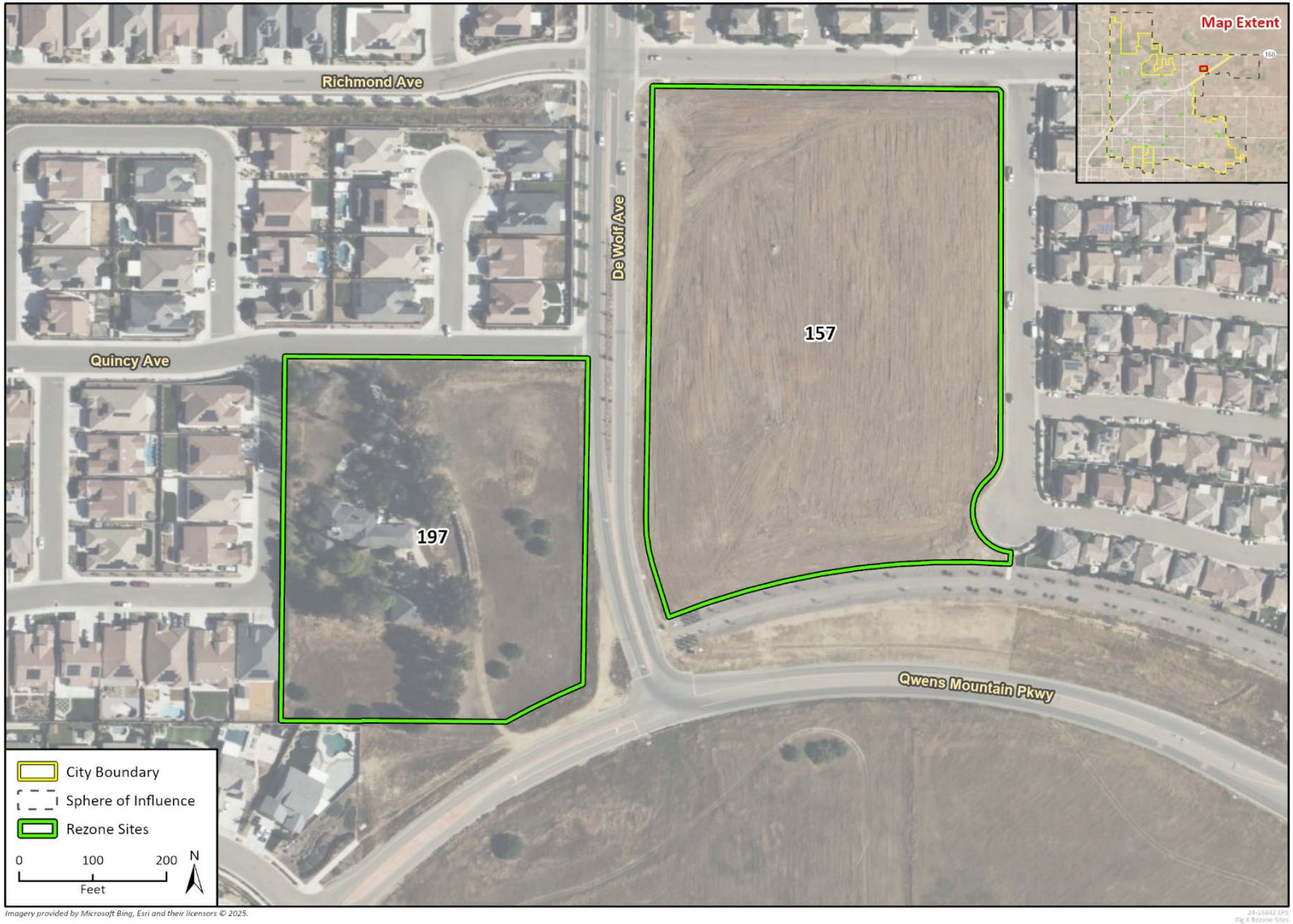


Figure 2h Rezone Site 161



Figure 2i Rezone Sites 167 and 168



Figure 2j Rezone Site 217



Figure 2k Rezone Site 589



Figure 2l Rezone Site 592



Figure 2m Rezone Sites 595, 596, and 597

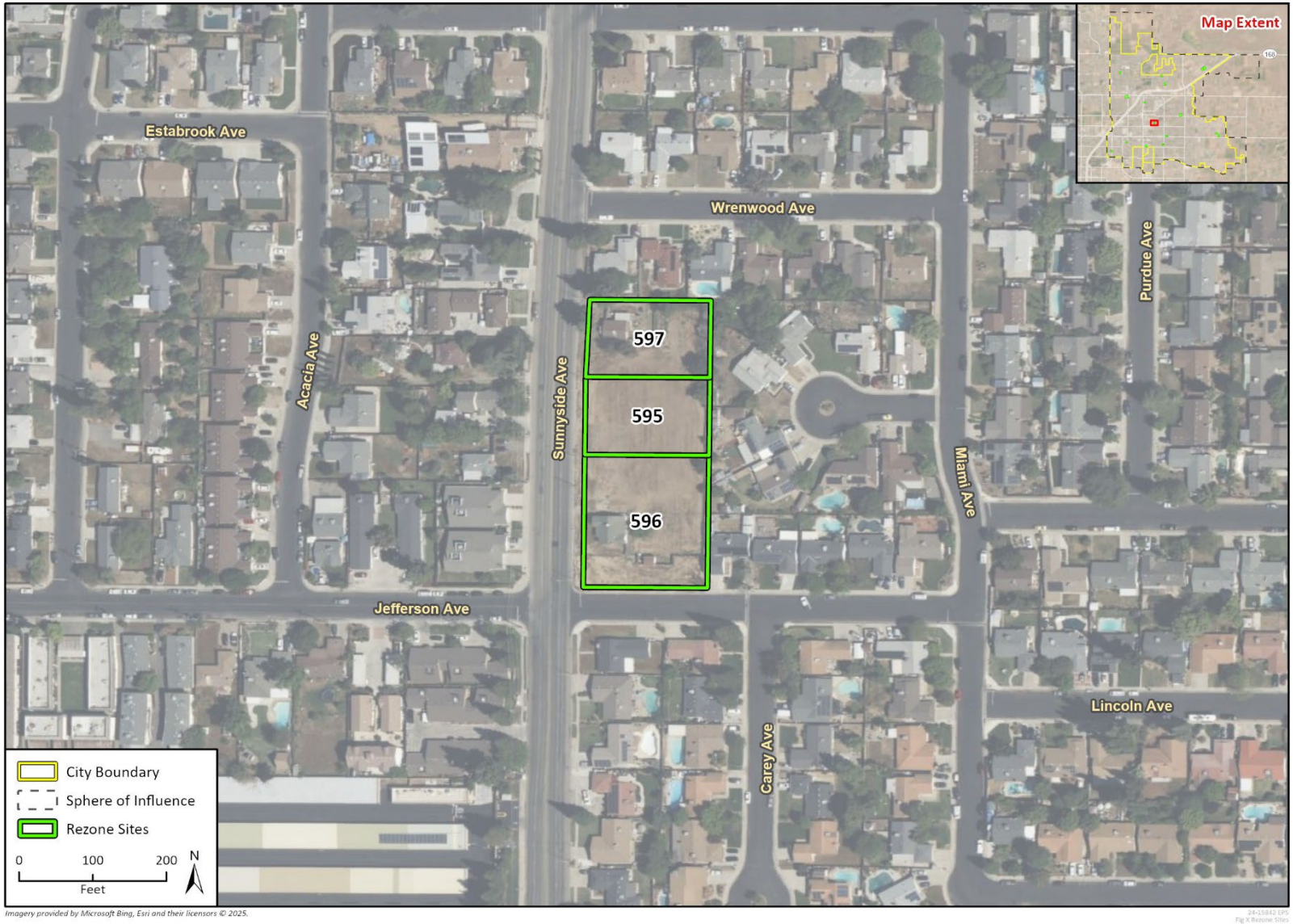
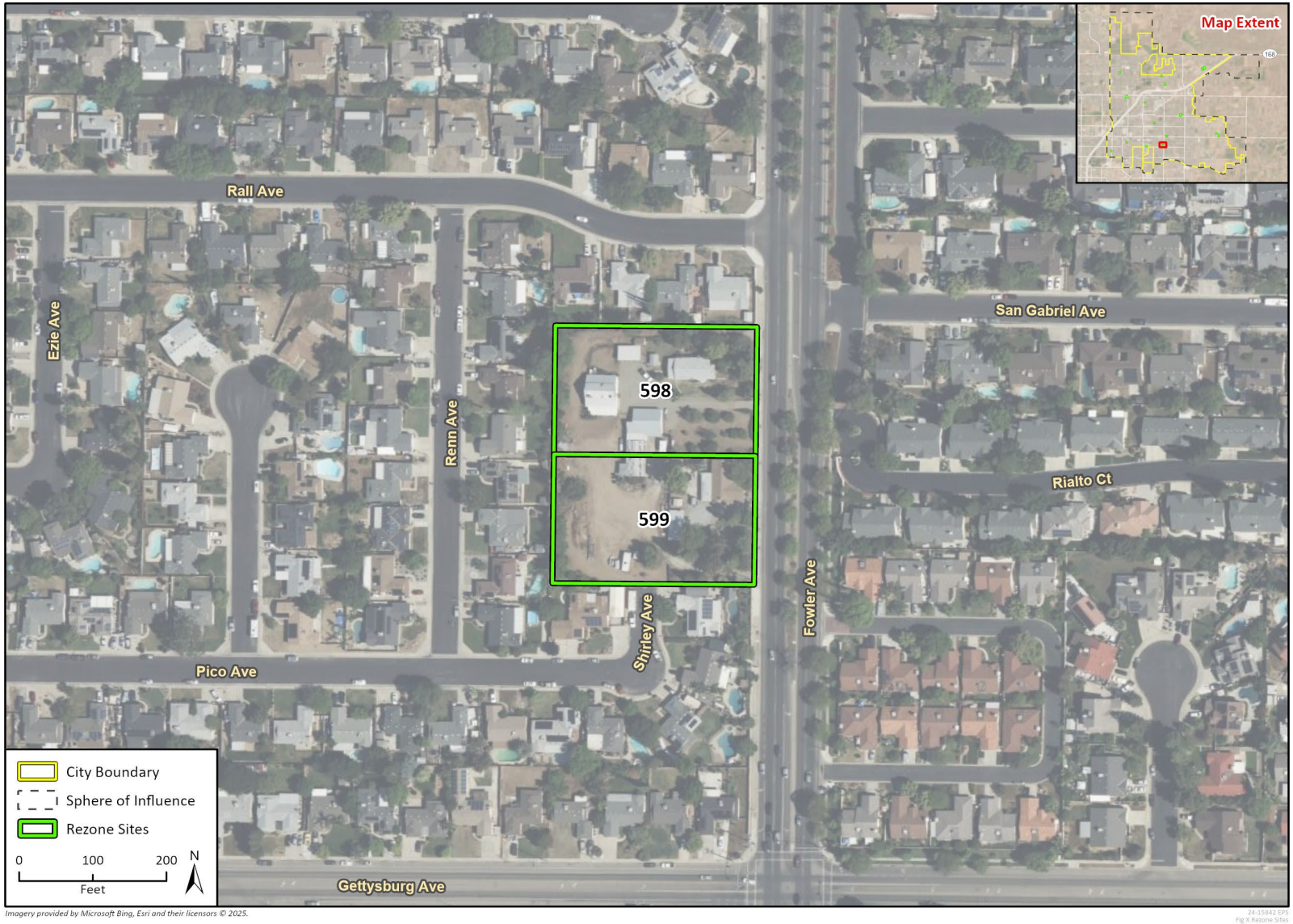


Figure 2n Rezone Sites 598 and 599



2 Regulatory Setting

This project is being conducted by the City to implement any programs necessary for statutory compliance with the settlement agreement, and as such, is exempt from CEQA, as set forth in Government Code section 65759 and CEQA Guidelines section 15282(s). This section presents a discussion of state laws, ordinances, regulations, and standards governing cultural resources for informational purposes only.

2.1 Government Code Section 65759

Section 65759 of the California Government Code states that CEQA does not apply to any action necessary to bring its general plan or relevant mandatory elements into compliance with any court order or judgement. However, the local agency shall prepare an initial study to determine the environmental effects of the proposed action necessary to comply with the court order. If as a result of the initial study, the local agency determines that the action may have a significant effect on the environment, the local agency shall prepare, within the time limitations specified in Section 65754, an environmental assessment, the content of which substantially conforms to the required content for a draft environmental impact report set forth in Article 9 (commencing with Section 15140) of Title 14 of the California Code of Regulations.

2.2 California Environmental Quality Act

California Public Resources Code (PRC) Section 21084.1 requires lead agencies to determine if a project could have a significant impact on historical or unique archaeological resources. As defined in PRC Section 21084.1, a historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources (CRHR), a resource included in a local register of historical resources or identified in a historical resources survey pursuant to PRC Section 5024.1(g), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant. PRC Section 21084.1 also states resources meeting the above criteria are presumed to be historically or cultural significant unless the preponderance of evidence demonstrates otherwise. Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR, as are California Historical Landmarks 770 and above; both are therefore historical resources under CEQA. Historical resources may include eligible built environment resources and archaeological resources of the precontact or historic periods.

CEQA Guidelines Section 15064.5(c) provides further guidance on the consideration of archaeological resources. If an archaeological resource does not qualify as a historical resource, it may meet the definition of a “unique archaeological resource” as identified in PRC Section 21083.2. PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) it contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, 2) has a special and particular quality such as being the oldest of its type or the best available example of its type, or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource does not qualify as a historical or unique archaeological resource, the impacts of a project on those resources will be less than significant and need not be considered further (CEQA Guidelines Section 15064.5[c][4]). CEQA Guidelines Section 15064.5 also provides guidance for addressing the potential presence of human remains, including those discovered during the implementation of a project.

According to CEQA, an impact that results in a substantial adverse change in the significance of a historical resource is considered a significant impact on the environment. A substantial adverse change could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR or a local register (CEQA Guidelines Section 15064.5[b][2][A]).

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a][b]).

The requirements for mitigation measures under CEQA are outlined in CEQA Guidelines Section 15126.4(a)(1). In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

2.2.1 California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 Section 4852. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (Public Resources Code, 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (Public Resources Code, 5024.1(b)). Unlike the NRHP however, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995:2).

A property is eligible for listing in the CRHR if it meets one of more of the following criteria:

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: Is associated with the lives of persons important to our past

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

2.3 California Senate Bill 18 of 2004

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill [SB] 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005); "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- A Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- A Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995).

2.4 California Health and Safety Code

Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined if the remains are subject to the Coroner's authority. If the human remains are of Native American origin, the coroner must notify the NAHC within 24 hours of this identification.

2.5 California Public Resources Code §5097.98

Section 5097.98 of the California Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code §7050.5, shall immediately notify those persons (i.e., the Most Likely Descendant [MLD]) that it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

3 Natural and Cultural Setting

This section provides background information pertaining to the natural and cultural context of the project site. It places the project site within the broader natural environment which has sustained populations throughout history. This section also provides an overview of regional indigenous history, local ethnography, and post-contact history. This background information describes the distribution and type of cultural resources documented within the vicinity of the project site to inform the cultural resources sensitivity assessment.

3.1 Natural Setting

The project site lies in the San Joaquin Valley with elevation ranging between 105 and 125 meters (344 to 410 feet) above mean sea level. None of the surrounding area retains its natural setting, with the various rezoning sites located in residential and commercial areas characterized by a mix of single-family homes, apartment complexes, and industrial buildings. The city of Clovis is situated between Dry Creek to the north, which runs roughly northeast to southwest, and Dog Creek to the east, which runs roughly north-south. Vegetation within the vicinity of the site consists of ornamental trees, including low ground cover and succulents, consistent with urban environmental settings and manicured landscapes.

3.2 Cultural Setting

3.2.1 Indigenous History

The Central Valley has been described as one of the largest intermontane basins extending 650 km from the Siskiyou to the Tehachapi mountains (Rosenthal et al. 2007). No single chronological framework covers the entirety of the Central Valley, but California prehistory is generally divided into three broad time periods: the Paleoindian Period (ca. 11,550 to 8,550 BCE), the Archaic Period (8,550 BCE to CE 1,100), and the Emergent Occupation (CE 1,000 to European Contact) (Fredrickson 1973, 1974), which has been updated and adjusted by Rosenthal et al. (2007) to further separate the Archaic Period into Lower (8,550 BCE to 5,550 BCE), Middle (5,550 BCE to 550 BCE), and Upper (550 BCE to CE 1,100). The prehistoric chronological sequence for the Central Valley presented below is based on Rosenthal et al. (2007) and Moratto (1984).

Paleoindian Period (11,550 to 8,550 BCE)

Little is currently known about the Paleoindian Period in the Central Valley. Geoarchaeological studies have demonstrated that erosion and deposition have buried or destroyed early archaeological deposits. Most claims of ancient human occupation have been dismissed by Moratto (1984) based on radiocarbon dating. This period is represented by isolated finds, and currently, the earliest accepted date of human occupation in the Central Valley ranges from 11,550 to 9,550 BCE and comes from fluted projectile points similar to Clovis points found at sites near Tracy Lake and the Tulare Lake Basin. Along with fluted projectile points, concave base points have been discovered along the Tulare Lake shoreline which was occupied during the Late Pleistocene (Rosenthal et al. 2007).

Lower Archaic (8,550 to 5,550 BCE)

Climate change at the end of the Pleistocene caused significant periods of alluvial deposition beginning around 9,050 BCE. These new alluvial deposits created a clear stratigraphic boundary between the Late Pleistocene and Holocene sediments. The Lower Archaic, like the Paleoindian Period, is represented only by limited isolated finds. Only one Lower Archaic site (KER-116) has been identified in the Central Valley proper and few in the foothills surrounding the valley (Rosenthal et al. 2007).

The relationship between foothill and valley floor adaptations is largely unknown during the Lower Archaic; however, it is suggested that the foothill sites may have been seasonally used during this time. More distinct adaptations are apparent in the Middle Archaic, and it is possible that these divergent traditions first emerged in the Lower Archaic (Rosenthal et al. 2007).

Middle Archaic (5,550 to 550 BCE)

The Middle Archaic began with substantial climate change to much warmer, drier conditions. Tulare Lake shrank and eventually disappeared. With this came new wetlands that created new habitats, and rising sea levels led to the creation of the Sacramento-San Joaquin Delta, creating new deposits. Fans and floodplains stabilized after an initial period of deposition in 5,550 BCE. Archaeological deposits dating to the Middle Archaic are rare in the Central Valley proper due to these geomorphic changes. The Middle Archaic record has revealed a pattern of organized subsistence strategies and increased residential stability. The archetypal pattern of the Middle Archaic has been identified as the Windmiller Pattern. This pattern is represented by extended burials oriented to the west and a sophisticated material culture (Rosenthal et al. 2007).

During this time, the mortar and pestle become more widespread, suggesting a shift toward more intensive subsistence practices and a higher reliance on acorn. Fishing technologies, such as bone gorges, hooks, and spears, also appear during the Middle Archaic, suggesting a new focus on fishing, especially in the Marsh Creek area. Several other technologies become apparent during this time. Baked-clay impressions of twined basketry, simple pottery, and other baked clay objects have been found at several sites. Personal adornment items also become more frequent. Exchange with outside groups is evidenced by the presence of obsidian, shell beads, and ornaments (Rosenthal et al. 2007, Moratto 1984, Burns et al. 2012). Trade also seemed to be focused on utilitarian items such as obsidian or finished obsidian tools from at least five separate sources (Moratto 1984).

Upper Archaic (550 BCE to CE 1,100)

The Upper Archaic began with the onset of the Late Holocene, marked by a cooler, wetter climate. The environmental conditions of the Upper Archaic were characterized by the return of lakes that had disappeared during the Middle Archaic and a renewed fan and floodplain deposition. The Upper Archaic is better represented in the archaeological record than earlier periods. Cultural diversity was more pronounced and is marked by contrasting material cultures throughout the valley (Rosenthal et al. 2007).

During this period, numerous specialized technologies were developed such as bone tools, and implements, manufactured goods such as Olivella and *Haliotis* beads and ornaments, well-made ceremonial blades, and ground-stone plummets. People living in the San Joaquin Valley region traded with neighboring groups for obsidian (Rosenthal et al. 2007).

Upper Archaic Period economies varied by region throughout the Central Valley. Economies were primarily focused on seasonal resources such as acorns, salmon, shellfish, rabbits, and deer (Rosenthal et al. 2007).

Emergent Occupation (CE 1000 to Historic)

The stable climatic conditions of the Upper Archaic continued into the Emergent Period. There has been sporadic research in the San Joaquin Valley on this time period, and thus only the Pacheco Complex on the western edge of the valley has been formally defined. After CE 1,000, many of the technologies witnessed during the Archaic disappeared to be replaced by cultural traditions witnessed at European contact. During the Emergent Period, the bow and arrow replaced the atlatl as the preferred hunting method sometime between CE 1,000 and 1,300 (Rosenthal et al. 2007).

Increased social complexity is evidenced by increased variation in burial types and offerings and larger residential communities. Grave offerings such as shell beads, ornaments, and ritually "killed" mortars and pestles are often found in burials. Pottery was frequently obtained through trade with groups living in the foothills to the east. The Panoche side-notched point became important in the western side of the San Joaquin Valley (Rosenthal et al. 2007). In addition to the side-notched point, the Panoche Complex featured large circular structures, flexed burials, marine shell beads, bone awls, milling stones, and mortars and pestles (Moratto 1984).

As with the Archaic Period, Emergent Period economies varied geographically, although throughout the Central Valley fishing and plant harvesting increased in importance. Most Emergent Period residential sites contain diverse assemblages of mammal and bird remains and large amounts of fish bone. After 1,000 years, the mortar and pestle become the dominant tool type and small seeds increase in archaeological deposits over time (Rosenthal et al. 2007).

3.2.2 Ethnographic Setting

The Project site is located in the traditional territory of the Penutian-speaking Yokuts, which includes San Joaquin Valley and surrounding foothills (Kroeber 1925, Wallace 1978). Three geographical divisions of the Yokuts are the Northern Valley, Southern Valley, and Foothill Yokuts. The distinction between the three groups is primarily based on language dialect (Mithun 2001). The Project is located at the approximate boundary between the ethnographic territories of the Northern and Southern Valley Yokuts, though more likely located within the ethnographic territory of the Southern Valley Yokuts, who occupied the southern San Joaquin Valley south of the San Joaquin River, to the foot of the Tehachapi Mountains. More specifically, the vicinity of the Project site was likely within the territory of the Tachi (Wallace 1978).

The Yokuts established large permanent village settlements, or closely associated smaller settlements. Residential structures were most often of two types: single-family dwellings and larger communal residences that housed 10 families or more. Villages frequently included mat-covered granaries and a sweathouse (Mithun 2001, Sutton et al. 2016). The closest known village sites to the Project site were "Golon," near the present-day community of Huron (approximately 16 miles south of the Project site); and "Udjiu", in a location later known as Posa de Chine or Poso Chane (approximately 18 miles south of the Project site) (Wallace 1978). Most of the western San Joaquin Valley is regarded as too arid to have supported permanent village sites, though the area was likely used for hunting and utilized for travel (Gayton 1945). The western periphery of the San Joaquin Valley was spanned by a major Native American trail, known by the Spanish name El Camino Viejo (Hoover et al. 2002; Davis 1961). El Camino Viejo stretched from modern-day Los Angeles to

Alameda County, and Cantua Creek served as a campsite along the route (Hoover et al. 2002). Prominent intersecting east-west trails were likely found along Panoche Creek (20 miles north of Project site) and Los Gatos Creek (16 miles south of Project site), connecting Yokuts communities to their western neighbors through the Coast Range (Heizer 1978; Arkush 1993). The Fresno Slough and other waterways also served as travel corridors by tule raft (Wallace 1978; Gayton 1945).

The basic economic unit among the Yokuts was the nuclear family. The nuclear family was linked to totemic lineages based on patrilineal descent. Totem symbols were passed from father to offspring. Families that shared the same totem formed an exogamous lineage. Totems were associated with one of two moieties. This moiety division played a role during ceremonies and other social events. Yokuts were split into self-governing local groups that included several villages. Each group had a chief who directed ceremonies, mediated disputes, handled punishment of those doing wrong, hosted visitors, and provided aid to the impoverished. In certain cases, settlements had two chiefs, one for each moiety. Other political positions included the chief's messenger and the spokesman (Wallace 1978).

Shamans were an important part of Yokut village life. A Yokut Shaman gained power through a dream or vision. If, after this vision, the man accepted the role as shaman, he would pray, fast, and acquire talismans to aid him in his future work. Shamans had the ability to heal the sick and served a primary role in religious life (Wallace 1978).

Yokuts subsistence strategy was based on a mixed economy focused on fishing, collecting, and hunting small game. Fishermen employed tule rafts and caught fish with nets, spears, basket traps, and bow and arrow. They often gathered mussels and hunted turtles in lakes, rivers, and streams. Wild seeds and roots contributed a large portion to the Yokuts diet. Tule roots were gathered, dried, and pounded into a flour that was prepared as a mush. Tule seeds and grass and flowering herb seeds were prepared in the same way. Leaves and stems of certain plants, such as clover and fiddleneck, were also collected. Acorns, a staple of most California Native Americans, were not readily available in the ethnographic territory of the Yokuts. Some Yokuts tribes traded for acorns with neighboring groups, such as the Salinan and Chumash to the west, the Foothill Yokuts to the east, and the Kawaiisu and Kitanemuk to the southeast (Kroeber 1925). Waterfowl was frequently hunted with snares, nets, and bow and arrow. Land mammals and birds contributed a smaller part of the Yokuts diet. Small game was occasionally taken in snares or traps or shot with bow and arrow (Wallace 1978, Sutton et al. 2016).

Yokuts technology depended primarily on tule. Stems of the plant served as the raw material for baskets, cradles, boats, housing, and many other items. *Manos* and *metate*s were used to process food and animal hides (Barton et al. 2010, Sutton et al. 2016). Tools such as knives, projectile points, and scraping tools were made from imported lithic materials, because stone was not readily available in the Central Valley. Some tools, such as bead drills, could be made from obsidian obtained from some distance or obtained through trade (Sutton et al. 2016). Marine shells secured through trade with coastal groups were used as shell money and personal adornment items, such as *Olivella* beads (Sutton et al. 2016, Wallace 1978).

3.2.3 Post-Contact Setting

Post-contact history for the state of California is generally divided into three periods: the Spanish Period (1769 to 1822), Mexican Period (1822 to 1848), and American Period (1848 to present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California begins with the establishment in 1769 of a settlement at San

Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican-American War, signals the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769-1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabríllo and Vizcaíno (Bancroft 1885).

By the eighteenth century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marks the beginning of California's historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769 (Hackel 1997).

Construction of missions and associated presidios was a major emphasis during the Spanish Period in California to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns; just three pueblos were established during the Spanish Period, only two of which were successful and remain as California cities: San José and Los Angeles (Gumprecht 1999).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914).

Mexican Period (1822-1848)

Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Hackel 1997).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Hackel 1997).

During the supremacy of the ranchos (1834 to 1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx

of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities (Chapman 1928).

American Period (1848- Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton, and evaded Californian soldiers in Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as United States territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were still desired, mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from Southern to Northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected many rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1994).

Local History

Since the community's founding in the final decade of the nineteenth century, life in Clovis has historically centered on the fertile farmlands that surround the city. The below history is excerpted from the *Draft Program Environmental Impact Report for the City of Clovis General Plan and Development Code Update* (Placeworks 2014).

> Clovis was founded following the construction of a freight stop along the recently completed San Joaquin Valley Railroad in 1891. As the agricultural potential of Fresno County began to be realized in the late nineteenth century, a number of individuals rapidly developed the railway to transport the region's grain, cattle, and timber longer distances. In close proximity to agriculture and the nearby Sierras, the new stop had an ideal location and was named after local farmer Clovis M. Cole, who sold a large portion of his wheat ranch in support of the railway.
>
> Another contributor to the growth of Clovis was the Fresno Flume and Irrigation Company. The company constructed the Shaver Log Flume that started at the Shaver Dam and traveled 42 miles into the valley to the present-day intersection of Fifth Street and Clovis Avenue. Here, the company constructed a 40-acre mill and finishing plant, which served as an impetus for the further development of Clovis as workers arrived to work at the plant.
>
> A number of businesses, churches, and schools soon developed in response to the increasing population and, by 1895, the community had its first post office. Italian immigrants brought grape production to Clovis with the first vineyards in the region. Clovis incorporated in 1912 and grew modestly into the 20th century, with its economy continuing to rely primarily on

agriculture. An unprecedented demand for canned food occurred with the onset of World War I, stimulating the local economy and growth in the City. As evidence of the City's changing status, Clovis High School was relocated to an ornate, Spanish-designed building in 1920.

Increased agricultural production required additional water, and the Central Valley Project (CVP) was undertaken in the early 1930s to provide irrigation and water management to the San Joaquin Valley. The CVP began as a New Deal project but was not completed until the early 1950s due to labor shortages caused by World War II. An original component of the CVP was the Friant-Kern Canal, which flows immediately northeast of Clovis. The City experienced a modest building boom in the years following World War II as a number of housing developments expanded away from the city center. Although residential growth has continued since that time, the City continues to maintain its small-town character.

4 Methods

This section presents the methods for each task completed during the preparation of this study.

4.1 Background and Archival Research

4.1.1 Archival Research

Rincon completed background and archival research in support of this study in May of 2025. A variety of primary and secondary source materials were consulted. Sources included, but were not limited to, historical maps, aerial photographs, and written histories of the area. The following sources were utilized to develop an understanding of the project site and its context:

- Historical aerial photographs accessed via NETR Online
- Historical U.S. Geological Survey topographic maps

4.1.2 California Historical Resources Information System Records Search

On April 21, 2025, Rincon received California Historical Resources Information System (CHRIS) records search results (Records Search File No. 25-160) from the South San Joaquin Valley Information Center (SSVIC) (Appendix A). The SSJVIC is the official state repository for cultural resources records and reports for the county in which the project falls. The purpose of the records search was to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.5-mile radius surrounding it. Rincon also reviewed the NRHP, CRHR, California Historical Landmarks list, and the Built Environment Resources Directory (BERD). Additionally, Rincon reviewed the Archaeological Determination of Eligibility (ADOE) list.

4.1.3 Sacred Lands File Search

Rincon contacted the NAHC on April 9, 2025, to request a Sacred Lands File (SLF) search, as well as a contact list of Native Americans culturally affiliated with the project area (Appendix B). Rincon did not conduct any outreach to the Native American contacts in the area to request information on potential cultural resources in the project vicinity that may be impacted by project development.

5 Findings

5.1 Background and Archival Research

5.1.1 California Historical Resources Information System Records Search

The CHRIS records search identified a total of 82 cultural resources studies within 0.5 miles of the project sites and 47 cultural resources within 0.5 miles of the project site, including 46 built environment resources and one archaeological resource. Resources include one prehistoric archaeological site, railroad segments, ranch and barn buildings, public buildings (i.e., libraries and churches), infrastructure elements (i.e., ditches and canals), and private single-family residences. Known studies and resources that occurred within 0.5-mile of the project site are included in Appendix A. Detailed findings per rezone sites are present below.

Rezone Site 3 – 270 West Herndon Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 63 – 1933 Alluvial Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 72 – 437 W. Nees Avenue

The CHRIS records search identified no previously conducted cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. One resource was identified during the CHRIS records search within the rezone site, and is detailed below.

Helm Colonial Ditch (P-10-005511/CA-FRE-3344H)

Resource P-10-005511, the Helm Colonial Ditch, was first recorded in 2005 by Wendy M. Nettles of Applied EarthWorks, Inc., who recorded and evaluated the West Branch. The West Branch of the Helm Colonial Ditch runs north to south paralleling N. Peach Avenue through the eastern edge of Rezone Site 72. The South Branch, which does not overlap Rezone Site 72, was then recorded and evaluated in 2019 by Carlos van Onna of Applied EarthWorks, Inc. The resource is described as a historical canal that originates from the Enterprise Canal near the intersection of Shepherd and Sunnyside Avenues north of Clovis. From the Enterprise Canal, the ditch meanders in a southwesterly direction paralleling Dry Creek until it reached the intersection of Teague and Clovis Avenues, where it splits into the South and West Branches. From the split, the South Branch continues parallel to Dry Creek in a southwesterly direction to Nees Avenue. The ditch then parallels Nees Avenue underground, then turns south to parallel Minnewawa Avenue. At Alluvial Avenue, the ditch cuts through the southeast to Herndon Avenue, then turns south to parallel Peach Avenue. Between Sierra and Bullard Avenues, the South Branch turns west and joins the Helm Canal. From the split, the West Branch continues west and then turns south at Peach Avenue. It continues along the western shoulder of Peach Avenue until it meets Herndon Avenue, where the ditch turns west,

paralleling Herndon Avenue to Maple Avenue. At Maple Avenue, the ditch turns south and joins the Helm Canal. Both branches are approximately 2 miles long.

Constructed sometime between 1911 and 1913, the Helm Colonial Ditch supplied irrigation water to, among other agricultural subdivisions, the Colonial Helm development. Both ditch and subdivision are named for William Helm—a prominent stockman, farmer, and financier in the early history of Fresno County. Major portions of this canal system have been piped underground over the past 40 years. Routine maintenance requires periodic cleanout of the open ditch, during which dredged soil is piled on each side of the ditch.

In 2019, Applied EarthWorks, Inc. evaluated the West Branch of the Helm Colonial Ditch and found it ineligible for the NRHP and CRHR. The State Historic Preservation Office concurred with this evaluation, and the resource record includes a status code 6Z: Found Ineligible for NRHP, CRHR, and local listing. Therefore, the West Branch of the Helm Colonial Ditch is not a historical resource as defined by CEQA Section 15064.5(a).

Rezone Site 108 – 125 & 135 N. Clovis Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 110 – 236 & 256 W. Santa Ana Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 115 – 1671 Leonard Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 157

The CHRIS records search identified one cultural resources study within the rezone site. The entirety of the rezone site had been previously surveyed in 2002. No resources were identified within the rezone site.

Rezone Site 161 – 2930 Willow Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 167 – 1871 Shaw Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 168 – 1853 Shaw Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 197 – 1479 N. Locan Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 217 – 885 Gettysburg Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 589 – 2403 Bullard Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 590 – 3959 Shaw Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 592 – 1160 N. Fowler Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 595 – 939 & 947 Sunnyside Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 596 – 965 & 975 Sunnyside Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 597 – 925 Sunnyside Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 598 – 2560 Fowler Avenue

The CHRIS records search identified no cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. No resources were identified within the rezone site.

Rezone Site 599 – 2612 Fowler Avenue

The CHRIS records search identified no previously conducted cultural resources studies within the rezone site. None of the rezone site has been previously surveyed. One previously recorded cultural resource was identified during the CHRIS search within the rezone site, and is detailed below.

Jefferson Canal (P-10-006140/CA-FRE-3615H)

Resource P-10-006140, the Jefferson Canal, was first recorded in 2012 by Randy Baloian of Applied EarthWorks, Inc. The Jefferson Canal runs east to west through the central portion of Rezone Site 599.The resource is described as a historical canal that originates from the Enterprise Canal near the intersection of Barstow and Leonard Avenues. It flows in a southwesterly direction until it turns west between Shaw and Gettysburg Avenues. Once it reaches Sierra Vista Parkway, the Jefferson canal splits. One branch continues west until it reaches Clovis Avenue. The other branch runs north along Sierra Vista Parkway until it turns west along Shaw Avenue. It then turns north along Clovis Avenue then angles northwest near the intersection with Scott Avenue. The canal then turns west near the intersection of Beverly Drive and Minnewawa Avenue then continues in this direction for approximately 0.4 miles. At this point, it angles south and continues for approximately 0.2 miles until it ends east of a Walmart Supercenter located at 323 W. Shaw Avenue. The total length of the Jefferson Canal is approximately 5 miles.

The Jefferson Canal was built sometime between 1907 and 1909 with an approximate length of 2 miles. The canal was then extended in the early 1920s and sometime between 1947 and 1964. The canal was originally above ground, but development of Clovis lead to the canal being piped under the surface.

In 2012, Applied EarthWorks, Inc. evaluated the Jefferson Canal and found it ineligible for the NRHP and CRHR. The same year, the Jefferson Canal was listed in the BERD with a code 6Y: Determined ineligible for the NRHP by consensus. Therefore, the Jefferson Canal is not a historical resource as defined by CEQA Section 15064.5(a).

5.1.2 Sacred Land File Search

On April 9, 2025, the NAHC responded to Rincon's SB 18 contacts request and SLF request, stating that the results of the SLF search were negative. See Appendix B for the NAHC response, including Tribal contacts list(s).

5.1.3 Aerial Imagery and Historical Topographic Maps Review

Rincon completed a review of historical topographic maps and aerial imagery to ascertain the development history of the project site. The development history of each Rezone Site is presented individually below.

Rezone Site 3 – 270 West Herndon Avenue

Historic topographic maps and aerial photographs of the property depict residential and agricultural uses from 1923 to circa 1980. Throughout this time buildings, structures and crops were added and removed. In circa 1980, the commercial building at 350 N. Villa Avenue was added to the site. The property has been used for residential and commercial purposes until the present. A cemetery has been located adjacent to the rezone site, east of N. Villa Avenue, since at least 1923. (NETR Online 2025a, 2025b)

Rezone Site 63 – 1933 Alluvial Avenue

Historical topographic maps and aerial photographs depict the rezone site as vacant and undeveloped up to 1962 followed by agricultural use up to 1984. During this time, two structures associated with the agriculture use appear on the property. After 1984, the property appears to

become a residence with new buildings and an added pool and associated driveway. (NETR Online 2025a, 2025b)

Rezone Site 72 – 437 W. Nees Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped up to 1957, when agricultural use starts. By 1964, an associated structure was constructed in the northeast corner of the rezone site, which was then demolished by 1982, and the agricultural fields were abandoned. At this time, the extant residential building and associated driveways and pool appear. (NETR Online 2025a, 2025b)

Rezone Site 108 – 125 & 135 N. Clovis Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped. By 1957, two residential buildings and associated structures appear within the western portion of the rezone site, which were then all demolished by 2009. No further buildings or structures appear within the rezone site up to the present (NETR Online 2025a, 2025b).

Rezone Site 110 – 236 & 256 W. Santa Ana Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped up to 1957, when two buildings and an associated driveway appear in the eastern half of the rezone site. The southern building was demolished in 1998 and the northern building was demolished in 2009. No further buildings or structures appear in the rezone site up to the present. (NETR Online 2025a, 2025b)

Rezone Site 115 – 1671 Leonard Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped until 1957. By 1957, the rezone site appears to be agricultural land with an associated structure appearing by 1964 near the eastern boundary with a second structure and orchard appearing by 1984, and a paved driveway appearing by 2002. The structures and agriculture are removed by 2020, and the rezone site remains vacant up to the present (NETR Online 2025a, 2025b).

Rezone Site 157

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped up to 1957 when it is then utilized as agricultural land. By 1972 a road appears in the northern portion of the rezone site. By 1998 the agricultural land was abandoned and the east to west running road is no longer visible. The rezone site has overgrown vegetation removed in 2012, but remains undeveloped with structures or buildings to the present. (NETR Online 2025a, 2025b)

Rezone Site 161 – 2930 Willow Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped. This is confirmed by aerial imagery from 1957 to 2022 which depicts the rezone site as vacant and undeveloped except for a line of trees that run parallel to W. Holland Avenue along the southern boundary from 1957 to 1962 (NETR Online 2025a, 2025b).

Rezone Site 167 – 1871 Shaw Avenue

Historical topographic maps and aerial photographs depict the rezone site as vacant and undeveloped until 1972 when two linear structures surrounded by agricultural land are depicted. The linear structures are no longer depicted by 1982. The property has remained vacant since. (NETR Online 2025a, 2025b)

Rezone Site 168 – 1853 Shaw Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped until 1946 when agricultural use appears on the site along with a south to north running road stemming from Shaw Avenue along the eastern edge of the rezone site. By 1972, the agricultural land appears abandoned, and by 1984, the south to north running road is no longer present. The rezone site remains in this condition to the present. (NETR Online 2025a, 2025b)

Rezone Site 197 – 1479 N. Locan Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped. A residential and ancillary building with dirt road were constructed by 1998. The property is mostly unchanged except for the removal of the oval dirt track in the southeast quadrant in 2009. (NETR Online 2025a, 2025b)

Rezone Site 217 – 885 Gettysburg Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1982, when two linear structures within the rezone site appear, one running east to west in the southern portion and the other running north to south along the eastern portion of the rezone site. These structures are removed by 2012, and the rezone site has remained vacant to the present. (NETR Online 2025a, 2025b)

Rezone Site 589 – 2403 Bullard Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped up to 1964 when two structures in the southwest portion of the rezone site appear. By 1984, both structures have been replaced with two different structures, both of which remain to the present. By 2010 a parking area is constructed in the eastern portion of the rezone site, with the remainder of the rezone site staying unchanged. (NETR Online 2025a, 2025b)

Rezone Site 590 – 3959 Shaw Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1957 when the rezone site is used as agricultural land. By 1974, one structure appears within the rezone site, which remains to the present. Between 2002 and 2022 multiple ancillary buildings in varying formations are built and demolished within the central portion of the rezone site. Some ancillary structures are still present today. (NETR Online 2025a, 2025b)

Rezone Site 592 – 1160 N. Fowler Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1957 when the rezone site appears as agricultural land. By 1982, one structure appears within the rezone site, which remains to the present. By 1998, an ancillary structure appears within the rezone

site, which is then removed by 2012. The rezone site remains unchanged to the present. (NETR Online 2025a, 2025b)

Rezone Site 595 – 939 & 947 Sunnyside Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1957 when a single structure in the western portion of the rezone site appears. By 1964 two additional structures appear in the western portion of the rezone site. All three structures are demolished by 2012, and the rezone site appears vacant to the present. (NETR Online 2025a, 2025b)

Rezone Site 596 – 965 & 975 Sunnyside Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1962 when a single structure appears in the western portion of the rezone site. By 1964, a total of three structures are located in the western portion of the rezone site, one of which is demolished by 1972. In 2002 one ancillary structure appears, which is demolished by 2009. By 2018, another structure is demolished, leaving only one structure at the rezone site which is still present. (NETR Online 2025a, 2025b)

Rezone Site 597 – 925 Sunnyside Avenue

Historical topographic maps and aerial photographs depict the rezone site vacant and undeveloped until a single structure in the western portion of the rezone site was constructed in 1957. The building was subsequently demolished in 2025 prior to August (NETR Online 2025a, 2025b)

Rezone Site 598 – 2560 Fowler Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1957 when three structures appear within the rezone site, which remain to the present (NETR Online 2025). By 2012, two small ancillary structures appear within the rezone site, both of which are demolished by 2022 (NETR Online 2025a, 2025b).

Rezone Site 599 – 2612 Fowler Avenue

Historical topographic maps and aerial imagery depict the rezone site vacant and undeveloped up to 1957 when agricultural use and a single structure appear in the southern portion of the rezone site as well as an irrigation canal. The irrigation canal is no longer present by 1962. By 1972, the agricultural land is abandoned and a new structure appears in the northeast corner of the rezone site. The rezone site remains unchanged to the present (NETR Online 2025a, 2025b).

5.1.4 Geologic and Soils Map Review

Geologically, the rezone sites are generally underlain by Quaternary age alluvium, lake, playa, and terrace deposits (California Department of Conservation 2015; Matthews and Burnett 1965). The California Department of Conservation (2015) and Matthews and Burnett (1965) identified geologic sediments within the project site as map units “Q.” These sediments are typically comprised of marine and nonmarine (continental) sedimentary rocks that may or may be unconsolidated or semi-consolidated. Additionally, these sediments consist mostly of alluvium. Because of the episodic nature of alluvial sedimentation, the sudden burial of artifacts is possible, and alluvial soils have an increased likelihood of containing buried archaeological deposits (Waters 1992).

Numerous soil series have been documented within the various project sites (California Soil Resource Lab n.d.). Soil series which comprised 80 to 95 percent of the soils within these project sites include the Atwater, Delhi, Greenfield, Handford, Ramona, Rocklin, San Joaquin, and the Visalia Series (California Soil Resource Lab 1999a, 1999b, 2003a, 2003b, 2003c, 2019, 2023). These soil series are described in further detail below, with the exception of the Visalia Series, as there is no available data for this series in the California Soil Resource Lab Soil Data Explorer tool. Other soil series within the project sites that comprise 20 percent of the project sites include the Dello, Grangeville, Himar, Dinuba, Snelling, Alamo, Foster, Chino, Chualar, Whitney, and the Exeter Series; no additional details pertaining to these soils series are provided here.

Table 3 Geological Soil Series within the Project Sites

Site ID	Address	APN	Elevation	Soil Series	Quarternary-Aged Alluvium Present	Buried A Horizon Soils Present
3	270 W Herndon Avenue	49102042	110-111 m	1) Delhi (85%); Hanford (6%); Dello (6%); Grangeville (1%); Himar (1%) Dinuba (1%) 2) Hanford (85%); Unnamed (15%)	Yes	No
63	1933 Alluvial Ave	56303207	115-116 m	1) San Joaquin (90%); Snelling (5%); Alamo (4%); Unnamed (1%) 2) San Joaquin (85%); Unnamed (15%)	Yes	No
72	437 W Nees Ave	56008207	111-112 m	Visalia (85%); Hildreth (3%); Unnamed (6%); Foster (2%); Chino (2%); Chualar (2%)	Yes	No
108	125 & 135 N Clovis Ave	49123124	111-112 m	Atwater (85%); Delhi (3%); Unnamed (12%)	Yes	No
110	236 & 256 W Santa Ana Ave	49906074	105-106 m	Hanford (85%); Unnamed (15%)	Yes	No
115	1671 Leonard Avenue	55457044S	119-122 m	Ramona (95%); Unnamed (5%) San Joaquin (85%); Unnamed (15%)	Yes	No
157	None	55803359S	124-125 m	Ramona (85%); Unnamed (15%)	Yes	No
161	2930 Willow Ave	43043316	104-105 m	Hanford (85%); Unnamed (15%)	Yes	No
167	1871 Shaw Ave	55128004	113 m	Greenfield (85%); Unnamed (15%)	Yes	No
168	1853 Shaw Ave	55128003	113 m	Greenfield (85%); Unnamed (15%)	Yes	No
197	1497 N Locan Ave	55849230	123-125 m	1) Ramona (85%); Unnamed (15%) 2) Rocklin (85%); Unnamed (15%)	Yes	No
217	885 Gettysburg Ave	49954013ST	109-110 m	Atwater (85%); Delhi (5%); San Joaquin (4%); Rocklin (4%); Whitney (2%)	Yes	No
589	2403 Bullard Ave	55026023	113-115 m	1) San Joaquin (85%); Exeter (10%); Unnamed (5%) 2) Ramona (85%); Unnamed (15%)	Yes	No
590	3959 Shaw Ave	55458036s	118-119 m	San Joaquin (85%); Unnamed (15%)	Yes	No
592	1160 N Fowler Ave	56303131	116-117 m	Ramona (85%); Unnamed (15%)	Yes	No
595	939 & 947 Sunnyside Ave	49817202	111 m	Ramona (80%); Unnamed (20%)	Yes	No
596	965 & 975 Sunnyside Ave	49817201	111 m	Ramona (80%); Unnamed (20%)	Yes	No
597	925 Sunnyside	49817203	111 m	Ramona (80%); Unnamed (20%)	Yes	No
598	2560 Fowler Ave	49938442	113 m	Delhi (85%); Hanford (6%); Dello (6%); Grangeville (1%); Himar (1%) Dinuba (1%)	Yes	No
599	2612 Fowler Ave	49938441	113 m	Delhi (85%); Hanford (6%); Dello (6%); Grangeville (1%); Himar (1%) Dinuba (1%)	Yes	No

The Atwater Series consist of very deep, well drained soils formed in granitic alluvium. This series generally occurs on gently undulating to rolling dunes in the eastern side of the San Joaquin Valley at elevations of less than 500 feet above means sea level. A typical soil profile of this series features soft and very friable pale to dark brown loamy sand from 0 to 24 inches; weak, slightly hard and very friable pale to dark brown sandy loam from 24 to 39 inches; and slightly hard and very friable yellowish brown to dark yellowish brown sandy loam from 39 to 60 inches below surface (California Soil Resource Lab 2003a). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The Delhi Series consist of very deep, excessively drained soils formed in wind modified material weathered from granitic sources. This series occurs on floodplains, alluvial fans and terraces in the eastern San Joaquin Valley as well as central valley and intermountain valleys in the western side of Southern California at elevations of 25 to 1,400 feet above mean sea level (California Soil Resource Lab 2023). A typical soil profile of this series features pale brown to brown loose sand from 0 to 21 inches; slightly lighter pale brown to brown loose sand from 21 to 40 inches; and light yellowish brown to yellowish brown loose sand from 40-70 inches. Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The Greenfield Series consists of alluvial soils formed from granitic and mixed rock sources. This series is commonly found along alluvial fans and terraces at elevations of 100 to 3,500 feet above mean sea level. A typical soil profile of this series features hard and friable pale to dark brown coarse sandy loam from 0 to 23 inches; weak and friable yellowish brown sandy loam with a thin patchy clay film from 23 to 51 inches; and soft, yellow stratified loamy sand, sandy loam, and fine sandy loam from 51 to 72 inches below surface (California Soil Resource Lab 2019). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The Hanford Series consist of coarse alluvium soils formed from granite along steam bottoms, alluvial fans, and floodplains. This series is commonly found in the San Joaquin Valley and valleys within central and southern California at elevations ranging between 150 to3,500 feet above mean sea level. A typical soil profile of this series features pale brown to dark brown, slightly hard and very friable fine sandy loam from 0 to 60 inches (California Soil Resource Lab 1999a). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The Ramona Series is part of the fine-loamy, mixed, thermic family of Typic Haploxeralfs formed in alluvium derived mostly from granitic and related rock sources. This series is on terraces and fans in the interior valleys of Central California and the western part of Southern California at elevations of 250 to 3,500 feet above mean sea level. A typical soil profile of this series features hard and very friable brown to dark brown sandy loam from 0 to 14 inches; hard and very friable brown to dark brown fine sandy loam from 14 to 23 inches; hard and friable brown to dark reddish brown loam from 23 to 29 inches; very hard and firm reddish brown to dark reddish brown sandy clay loam from 29 to 37 inches; very hard and firm yellowish red sandy clay loam from 37 to 68 inches; and hard and firm strong brown fine sandy loam from 68 to 74 inches (California Soil Resource Lab 2003b). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The Rocklin Series consists of moderately well to well drained soils formed in old alluvium from granitic rock sources. This series is located on nearly level to rolling dissected terraces and is found between 80 to 500 feet above mean sea level in the eastern edge of the San Joaquin Valley and up to 2,500 feet in the intermountain valleys of Southern California. A typical soil profile of this series

features hard and very friable light brown to dark brown fine sandy loam from 0 to 8 inches; hard and friable yellowish red loam from 8 to 24 inches; extremely hard and brittle reddish yellow indurated duripan from 24 to 28 inches; and very hard, dense, and brittle reddish yellow weakly cemented stratified sediments that crush to fine sandy loam from 28 to 60 inches (California Soil Resource Lab 2003c). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

The San Joaquin Series consists of alluvium derived from granitic rock along low terraces, with varying levels of duripan. This series is commonly found at elevations of 20 to 500 feet in the San Joaquin and Sacramento Valleys. A typical profile of this series features hard and friable brown to dark brown or reddish-brown loam from 0 to 16 inches; extremely hard and firm brown clay from 16 to 26 inches; brittle and light brown indurated duripan from 26 to 29 inches; and hard but brittle brown duripan from 29 to 60 inches below surface (California Soil Resource Lab 1999b). Buried A horizons are not identified in this series, according to the California Soil Resource Lab Soil Data Explorer tool.

5.1.5 Archaeological Sensitivity Summary

Geoarchaeological studies regarding pre-contact archaeological sites have established the following predictive variables: proximity to previously recorded archaeological sites, underlying geology, and proximity to freshwater sources (Meyer and Rosenthal 2007). Therefore, Rincon considered proximity to previously recorded archaeological sites, buildings, and structures identified during the records search to increase archaeological sensitivity. Additionally, previous disturbance from construction of extant buildings is considered to decrease archaeological sensitivity due to the destructive nature of related ground disturbing activities.

The archival research indicates the sediments mapped at surface within the rezone sites are generally conducive to the natural burial and preservation of archaeological resources given they were deposited during the Holocene, a period consistent with recorded human occupation of the region. The soils map indicates all rezone sites are mapped with soil profiles that lack buried A Horizon soil indicative of buried paleosurfaces. Only two rezone sites, 115 and 590, are in close proximity (i.e., within 500 feet) of a freshwater source, and one rezone site, 161, is in proximity to a previously recorded archaeological resource. These factors increase the sensitivity for subsurface archaeological resources in those three rezone sites. Finally, 11 of the rezone sites include previous construction, as evidenced by extant buildings and/or associated structures. However, of these, one (rezone site 3) includes a building from the historic-period constructed by 1923, which further increases the sensitivity for historic-period archaeological resources. In consideration of the factors above, a summary of archaeological sensitivity (low, medium, or high) in consideration of these factors is included in Table 4 below.

Table 4 Archaeological Sensitivity by Rezone Site

Site ID	Address	APN	Archaeological Sensitivity
3	270 W Herndon Avenue	49102042	High
63	1933 Alluvial Ave	56303207	Low
72	437 W Nees Ave	56008207	Low
108	125 & 135 N Clovis Ave	49123124	Moderate
110	236 & 256 W Santa Ana Ave	49906074	Moderate
115	1671 Leonard Avenue	55457044S	Moderate
157	None	55803359S	High
161	2930 Willow Ave	43043316	Moderate
167	1871 Shaw Ave	55128004	Moderate
168	1853 Shaw Ave	55128003	Low
197	1497 N Locan Ave	55849230	Low
217	885 Gettysburg Ave	49954013ST	Low
589	2403 Bullard Ave	55026023	Low
590	3959 Shaw Ave	55458036s	Low
592	1160 N Fowler Ave	56303131	Low
595	939 & 947 Sunnyside Ave	49817202	Low
596	965 & 975 Sunnyside Ave	49817201	Low
597	925 Sunnyside	49817203	Low
598	2560 Fowler Ave	49938442	Low
599	2612 Fowler Ave	49938441	Low

5.1.6 Built Environment Sensitivity Summary

The table below provides built dates for properties with buildings. Any property with buildings over 45 years of age or older will require additional study during future projects.

Table 5 Overview of Build Date for Properties by Rezone Site

Site ID*	APN	Address	Vacant?	Existing Use	Built Date
3	49102042	270 W Herndon Avenue	No	Single-family residence; Sports facility; Tree lot	c. 1965
63	56303207	1933 Alluvial Ave	No	Single family residence	1971
72	56008207	437 W Nees Ave	No	Single family residence	1978
108	49123124	125 & 135 N Clovis Ave	Yes	Vacant	NA
110	49906074	236 & 256 W Santa Ana Ave	Yes	Vacant	NA
115	55457044S	1671 Leonard Ave	Yes	Vacant	NA
157	55803359S	De Wolf & Richmond Ave	Yes	Vacant	NA
161	43043316	2930 Willow Ave	Yes	Vacant	NA
167	55128004	1871 Shaw Ave	Yes	Vacant	NA
168	55128003	1853 Shaw Ave	Yes	Vacant	NA
197	55849230	1497 N Locan Ave	No	Single family residence	1988
217	49954013ST	885 Gettysburg Ave	No	Clovis Academy of Gymnastics & Dance	c. 1980
589	55026023	2403 Bullard Ave	No	Former Rogers Helicopter	c. 1980
590	55458036S	3959 Shaw Ave	No	Single-family residence	c. 1965
592	56303131	1160 N Fowler Ave	No	Single family residence	1976
595	49817202	939 & 947 Sunnyside Ave	Yes	Vacant	NA
596	49817201	965 & 975 Sunnyside Ave	Yes	Vacant	NA
597	49817203	925 Sunnyside	No	Vacant	N/A
598	49938442	2560 Fowler Ave	No	Single family residence	1925
599	49938441	2612 Fowler Ave	No	Single family residence	1960

6 Conclusions

The constraints analysis included here is organized based on the cultural resources thresholds included in CEQA Guidelines Appendix G: Environmental Checklist Form:

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?
c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Threshold A broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, we have chosen to limit analysis under Threshold A to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Threshold B.

6.1 Historical Built Environment Resources

The field survey and background research identified two previously evaluated built environment resources: Helm Colonial Ditch (P-10-005511/CA-FRE-3344H) and Jefferson Canal (P-10-006140/CA-FRE-3615H). Both have been evaluated and determined ineligible for listing in the NRHP and CRHR, and therefore, are not historical resources as defined by CEQA Section 15064.5(a). Research also identified 11 rezone sites that include built environment resources that have not been previously evaluated for NRHP or CRHR eligibility.

Although the project includes rezoning and amending the land use designations, and there are no specific development associated with the project, implementation of the project would guide future development. Potential future development facilitated by the project may include site preparation, demolition, and construction activities and could have the potential to result in the physical demolition, destruction, relocation, or alteration of potential historical resources.

Historic-aged buildings, as well as parcels with buildings that may become age-eligible with the passage of time, may require further evaluation to determine if they are historical resources pursuant to CEQA and may be affected by a future project. Therefore, there is potential to impact historical resources.

6.1.1 Recommended Mitigation Measures

CUL-1a Identification of Historical Resources

A historical resources evaluation shall be prepared for projects carried out within the project area involving the demolition or physical alteration of a building, structure, object, or other built environment feature that is 45 years of age or older. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural

historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed rezone site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the South San Joaquin Valley Information Center. If the property is already a historical resource as defined by *CEQA Guidelines* Section 15064.5(a), the historical resources evaluation described above shall not be required. Properties requiring evaluation are included in Table 6.

Table 6 Properties Requiring Evaluation

Site ID*	APN	Address	Existing Use	Built Date	Age Eligible	45 Year Threshold
3	49102042	270 W Herndon Avenue	Single-family residence; Sports facility; Tree lot	c. 1965	Yes	NA
63	56303207	1933 Alluvial Ave	Single family residence	1971	Yes	NA
72	56008207	437 W Nees Ave	Single family residence	1978	Yes	NA
197	55849230	1497 N Locan Ave	Single family residence	1988	No	2033
217	49954013ST	885 Gettysburg Ave	Clovis Academy of Gymnastics & Dance	c. 1980	Yes	NA
589	55026023	2403 Bullard Ave	Former Rogers Helicopter	c. 1980	Yes	NA
590	55458036S	3959 Shaw Ave	Single-family residence	c. 1965	Yes	NA
592	56303131	1160 N Fowler Ave	Single family residence	1976	Yes	NA
598	49938442	2560 Fowler Ave	Single family residence	1925	Yes	NA
599	49938441	2612 Fowler Ave	Single family residence	1960	Yes	NA

CUL-1b Treatment of Historical Resources

If a project would to occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance).

Mitigation may include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits.

If historical resources are identified and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, Historic American Building Survey (HABS)-

Like report, interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1a and CUL-1b would reduce impacts to historical resources to the extent feasible by identifying and evaluating significant historical resources and managing avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards as applicable. Nonetheless, even with implementation of Mitigation Measures CUL-1a and CUL-1b, eligible historical resources could still be materially impaired by future development that would be carried out under the proposed project. It is possible that a future project could result in the demolition or substantial alteration of a historical resource. Therefore, even with mitigation impacts may not be reduced to a less than significant level, and the impact would remain significant and unavoidable.

6.2 Historical and Unique Archaeological Resources

This study did not identify any previously recorded archaeological resources in any of the proposed rezone sites. However, only one rezone site (157) has been previously surveyed, which took place in 2002. In addition, seven rezone sites are considered to have moderate to high potential for subsurface archaeological deposits. The absence of previously recorded prehistoric or historic-period archaeological resources within the immediate vicinity of the remaining rezone sites, along with the existing level of disturbance, suggests there is a low potential for encountering intact subsurface archaeological deposits. However, as these sites have not been previously studied, lack of evidence and sensitivity does not preclude the existence of archaeological resources within these rezone sites. Therefore, future development of any rezone site would have the potential to directly or indirectly impact subsurface archaeological resources through ground disturbing activities associated with construction. The following recommended mitigation measures are for archaeological resources studies and unanticipated archaeological resources. With adherence to these measures, Rincon recommends a finding of less-than-significant impact with mitigation for archaeological resources under CEQA.

6.2.1 Recommended Mitigation Measures

CUL-2a Archaeological Resource Study

For future projects involving ground disturbance on the Infill Rezone Program sites listed in Table 7 below the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the South San Joaquin Valley Information Center, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval.

If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall

be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.

Table 7 Properties Requiring an Archaeological Resources Study

Site ID*	APN	Address
3	49102042	350 N Villa Ave
63	56303207	1933 Alluvial Ave
72	56008207	437 W Nees Ave
108	49123124	125 & 135 N Clovis Ave
110	49906074	236 & 256 W Santa Ana Ave
115	55457044S	1671 Leonard Ave
157	55803359S	De Wolf & Richmond Ave
161	43043316	2930 Willow Ave
167	55128004	1871 Shaw Ave
168	55128003	1853 Shaw Ave
197	55849230	1497 N Locan Ave
217	49954013ST	885 Gettysburg Ave
589	55026023	2403 Bullard Ave
590	55458036S	3959 Shaw Ave
592	56303131	1160 N Fowler Ave
595	49817202	939 & 947 Sunnyside Ave
596	49817201	965 & 975 Sunnyside Ave
597	49817203	925 Sunnyside
598	49938442	2560 Fowler Ave
599	49938441	2612 Fowler Ave

CUL-2b Unanticipated Discovery of Archaeological Resources

In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative,

as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).

Significance After Mitigation

Implementation of Mitigation Measures CUL-2a and CUL-2b would reduce impacts to archaeological resources to less than significant levels by ensuring the avoidance of archaeological resources to the extent feasible, or by identifying, evaluating, and conducting data recovery archaeological resources that may be impacted by future projects in a timely manner. With implementation of these measures, impacts to archaeological resources would be less than significant.

6.3 Human Remains

No human remains are known to be present within the project site. However, the discovery of human remains is a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the County Coroner must be notified immediately. If the human remains are determined to be of Native American origin, the Coroner will notify the NAHC, which will determine and notify an MLD. The MLD has 48 hours from being granted site access to make recommendations for the disposition of the remains. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from subsequent disturbance.

Impacts would be less than significant without mitigation.

7 References

California Office of Historic Preservation

1995 *Instructions for Recording Historical Resources*. Department of Parks and Recreation, Sacramento, California.

2011 "California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register)," *California Office of Historic Preservation Technical Assistance Series #6*. Department of Parks and Recreation, Sacramento, California

Bancroft, Hubert How

1885 History of California, Volume III: 1825-1840. San Francisco, California: A.L. Bancroft & Co.

Barton, Amber, Maria Del Carmen Guzman, and Breeann Romo

2010 The Preliminary Results of the 2008 Archaeological Investigations at the Bead Hill Site (KRE-450), Buena Vista Lake, California*. SCA Proceedings* 24: 1-12.

Bean, Walton

1968 *California: An Interpretive History.* McGraw-Hill Book Company, San Francisco, California.

California Department of Conservation

2015 Geologic Map of California – Clovis, California. Electronic map at https://maps.conservation.ca.gov/cgs/gmc/, accessed April 2025.

California Soil Resource Lab

n.d. *SoilWeb – Clovis, California*. Online interactive map. https://casoilresource.lawr.ucdavis.edu/gmap/, accessed April 2025.

1999a *Soil Data Explorer – Hanford Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=hanford#osd, accessed January 2023.

1999b *Soil Data Explorer – San Joaquin Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=san%20joaquin#osd, accessed January 2023.

2003a *Soil Data Explore – Atwater Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=atwater#osd, accessed April 2025.

2003b *Soil Data Explorer – Ramona Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=ramona#osd, accessed April 2025.

2003c *Soil Data Explorer – Rocklin Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=rocklin#osd, accessed April 2025.

2019 *Soil Data Explorer – Greenfield Series.* https://casoilresource.lawr.ucdavis.edu/sde/?series=greenfield#osd, accessed January 2023.

2023 *Soil Data Explorer – Delhi Series.* casoilresource.lawr.ucdavis.edu/sde/?series=delhi#osd, accessed April 2025.

Chapman, R.N.

1928 Quantitative Analysis of Environmental Factors. *Ecology* 9: 111-122.

Davis, James

1961 Trade Routes and Economic Exchange Among the Indians of California. *Reports of the University of California Archaeological Survey* 54.

Dumke, Glenn S.

1994 The Boom of the 1880s in Southern California. Southern California Quarterly 76(1):99-114.

Gayton, A.H.

1945 Yokuts and Western Mono Social Organization. *American Anthropologist* 47(3):409-426.

Hackel, Steven W.

1997 Land, Labor, and Production: The Colonial Economy of Spanish and Mexican California. *California History* 76(2/3):111-146.

Kroeber, Alfred L.

1925 *Handbook of the Indians of California*. Bulletin 78, Bureau of American Ethnology, Smithsonian Institution. Government Printing Office, Washington, D.C. Reprinted 1976 by Dover Publications, Inc., New York.

Kyle, Douglas E.

2002 Historic Spots in California. Stanford, California: Stanford University Press.

Livingston, M.M.

1914 The Earliest Spanish Land Grants in California. Annual Publication of the Historical Society of Southern California 9(3):195-199.

Matthews, R.A., and Burnett, J.L.

1965 Geologic map of California: Fresno Sheet: California Division of Mines and Geology, Geologic Atlas of California GAM-05, scale 1:250,000. Electronic document at https://ngmdb.usgs.gov/ngm-bin/pdp/zui_viewer.pl?id=7654, accessed April 2025.

Mithun, Marianne

2001 *The Languages of Native North America.* Reprinted. Originally published 1999. Cambridge University Press, New York.

Moratto, Michael J.

1984 The Central Valley Region. *In California Archaeology,* pp. 167-216. Coyote Press, Salinas, California.

National Park Service

1983 Secretary of the Interior's Standards and Guidelines for Professional Qualifications in Archaeology and Historic Preservation. Department of the Interior.

1997 *National Register Bulletin-How to Apply the National Register Criteria for Evaluation.* Accessed online at https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. October 2022.

NETR Online

2025a Topographic maps dated 1923, 1946, 1947, 1955, 1956, 1965, 1974, 1982, 2012, 2015, 2021. https://www.historicaerials.com/viewer, accessed multiple.

2025b Aerial photographs dated 1957, 1961, 1964, 1972, 1974, 1982, 1984, 1998, 2002, 2005, 2009, 2010, 2012, 2018, 2020, 2022. https://www.historicaerials.com/viewer, accessed multiple.

Placeworks

2014 Draft Program Environmental Impact Report, General Plan and Development Code Update. Prepared for the City of Clovis. June. https://cityofclovis.com/wp-content/uploads/2018/10/Chapter-05-05-Cultural-Resources.pdf, accessed March 11, 2020.

Rolle, Andrew

2003 *California: A History.* Sixth printing. 1963. Harlan Davidson, Inc. Wheeling, Illinois.

Rosenthal, Jeffrey, Gregory White, and Mark Sutton

2007 The Central Valley: A View from the Catbird's Seat. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 147-164. AltaMira Press, Lanham Maryland.

Sutton, Mark Q., Jille K. Gardner, Kenneth W. Gobalet, and Nancy Valente

2016 "Archaeological Investigations at the Manifold Site (CA-KER-4220), Buena Vista Lake, Southern San Joaquin Valley, California." Pacific Coast Archaeological Society Quarterly, Vol. 52 (4), pp. 15-82.

Wallace, William J.

1978 "Southern Valley Yokuts." In "California," edited by Robert F. Heizer, pp. 448−461. *Handbook of North American Indians,* Vol. 8, William C. Sturtevant, general editor, Smithsonian Institution, Washington.

Waugh, John C.

2003 On the Brink of Civil War: The Compromise of 1850 and How it Changed the Course of American History. Wilmington, Delaware: Scholarly Resources Inc.

Waters, Michael R.

1992 Principles of Geoarchaeology: A North American Perspective. Tucson, Arizona: The University of Arizona Press.

Appendix A

CHRIS Records Search Results [CONFIDENTIAL]

Appendix B

NAHC Sacred Lands File Results [CONFIDENTIAL]

Appendix D

Tribal Consultation

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

Commissioner
Vacant

ACTING EXECUTIVE SECRETARY
STEVEN QUINN

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov

April 9, 2025

Alyssa Newcomb
Rincon Consultants, Inc.

Via Email to: anewcomb@rinconconsultants.com

Re: Native American Consultation, Pursuant to Senate Bill 18, Government Code §65352.3 and §65352.4, 24-15842 Clovis Infill Rezone Program Environmental Assessment Project, Fresno County

To Whom It May Concern:

Attached is a consultation list of tribes with traditional lands or cultural places located within the boundaries of the above referenced counties.

Government Code §65352.3 and §65352.4 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans.

The law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction. The NAHC believes that this is the best practice to ensure that tribes are consulted commensurate with the intent of the law.

The NAHC also believes that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

    - A listing of any and all known cultural resources that have already been recorded or are adjacent to the APE, such as known archaeological sites;
    - Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
    - Whether the records search indicates a low, moderate or high probability that unrecorded cultural resources are located in the APE; and
    - If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code §6254.10.

3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we are able to assure that our consultation list remains current.

If you have any questions, please contact me at my email address: melina.carlos@nahc.ca.gov

Sincerely,

Melina Carlos

Melina Carlos
Cultural Resources Analyst

Attachment

Appendix E

Water Supply Assessment

CITY OF CLOVIS

WATER SUPPLY ASSESSMENT: INFILL REZONE PROGRAM

CLOVIS, CA
MAY 2025

PREPARED FOR:
City of Clovis

PREPARED BY:
Provost & Pritchard Consulting Group
455 W. Fir Avenue, Clovis, CA 93611

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Heather Bashian, PE
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ABBREVIATIONS

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

1 INTRODUCTION

1.1 PURPOSE AND NEED FOR THE WATER SUPPLY ASSESSMENT

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

This WSA evaluates the adequacy of available water supplies for the proposed City of Clovis, Infill Rezone Program, located at various parcels throughout the City of Clovis, California. The Project would entail the rezoning on 54.32 acres across 20 parcels to create the capacity to provide approximately 1,303 affordable housing dwelling units, which is greater than the "500 residential units" trigger; therefore, a WSA is required.

The City of Clovis operates the water system to which the Project proposes to connect. This water system meets the standards for a "Public Water System" as set forth in CWC §10912(c); the City is therefore responsible for preparation of the required WSA in accordance with CWC §10910(b).

This WSA discusses the estimated water demands and water supply for the proposed Project. The Project is located in the City of Clovis (City) limits; the entire Project will be supplied water from the City.

1.2 RELIANCE ON A RELATED URBAN WATER MANAGEMENT PLAN

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

The 2020 Clovis UWMP covers the SOI for the City. This Project lies across 20 parcels within the City of Clovis (City) limits, within the City's SOI (Provost & Pritchard Consulting Group, 2021). Thus, in accordance with the CWC, the preparers have relied on information from the UWMP wherever possible in preparing the various elements of this Assessment.

1.3 DOCUMENT ORGANIZATION

This WSA is organized as follows:

- Section 2 describes the Project and its location.
- Section 3 describes the Project's potable and non-potable water demands in addition to those of other existing and planned uses, and variations from the numbers in the UWMP.
- Section 4 provides an overview of the City's primary water supplies.
- Section 5 discusses the adequacy of water supplies during normal years.
- Section 6 discusses the adequacy of water supplies during single-dry and multiple-dry years.
- Section 7 discusses operational reliability on a daily basis.
- Section 8 concludes whether supplies would be adequate during normal, dry-year, and multiple-dry years during a 20-year projection.
- Section 9 lists references cited in this WSA.

2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SETTING

The City limits currently encompasses 25.9 square miles. The City's Sphere of Influence (SOI) covers 34.9 square miles, while the City's General Plan (GP) encompasses approximately 74.3 square miles. The City's General Plan (Placeworks, 2014) identified three Urban Centers to focus growth, including Loma Vista, the Northwest area, and the Northeast area; this Project lies across 20 parcels, within the City of Clovis (City) limits. **Figure 2-1** identifies the location(s) of the Project in relation to the surrounding Clovis/Fresno region.

The Project would entail a General Plan Amendment and rezoning on 54.32 acres across 20 parcels to create the capacity to provide approximately 1,303 affordable housing dwelling units. The Project is a proposed High Density Residential (HDR) development. The Project site includes 54 gross acres bounded by the City's Sphere of Influence (SOI). The Project site encompasses 20 parcels, as listed in Table 2-1.

The Project area is currently designated in the City's General Plan, as various types of Residential, General Commercial, Office, Mixed-Use Village, and Industrial land uses.

Table 2-1. Existing Land Use Designation

Existing Land Use Designation	Site ID	APN	Existing Use	Units	Acreage
General Commercial	3	491-020-42	Single-Family Residential, Commercial business, Tree Lot	193	8.06
Low Density Residential	63	563-032-07	Existing Residence	91	3.78
Low Density Residential	72	560-082-07	Existing Building	77	3.19
Medium Density Residential	108	491-231-24	Vacant	30	1.25
Medium Density Residential	110	499-060-74	Vacant	30	1.25
Medium Density Residential	115	554-570-44S	Vacant	55	2.31
Mixed-Use Village	157	558-033-59S	Vacant	174	7.24
Office	161	430-433-16	Vacant	40	1.67
Office	167	551-280-04	Vacant	25	1.04
Office	168	551-280-03	Vacant	31	1.3
Very Low Density Residential	197	558-492-30	Existing rural residential home	108	4.5
Industrial	217	499-540-13ST	Commercial business – Clovis Academy of Gymnastics and Dance	43	1.8
Low Density Residential	589	550-260-23	Former Rogers	192	8.01
Medium Density Residential	590	554-580-36S	Single-Family Residential	72	3.02
Low Density Residential	592	563-031-31	Existing Rural Residential	50	2.09
Low Density Residential	595	498-172-02	Vacant	10	0.41
Low Density Residential	596	498-172-01	Vacant	18	0.72
Low Density Residential	597	498-172-03	Residence, Same Owner as 595 &	10	0.41
Low Density Residential	598	499-384-42	Existing Residence	26	1.09
Low Density Residential	599	499-384-41	Existing Residence	28	1.18
			Totals:	1,303	54.32

2.2 WATER SUPPLY AND DISTRIBUTION

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

The Project area is within both the water system's Pressure Zone 1 and Pressure Zone 2. Water will be delivered to the Project via the City's existing and planned distribution system. Table 2-2 shows the sites in Pressure Zone 1, and Table 2-3 the sites in Pressure Zone 2. The water distribution system is shown in full in the Water Master Plan Update, Phase III (WMP) (Provost & Pritchard Consulting Group, 2018), and in

detail for this area on Figure 2-2. Through other projects in the area being undertaken by others, the master-planned infrastructure is being constructed in the City's Sphere of Influence (SOI).

Table 2-2. Parcels in Pressure Zone 1

Site ID	APN
3	491-020-42
72	560-082-07
108	491-231-24
110	499-060-74
161	430-433-16
167	551-280-04
168	551-280-03
217	499-540-13ST
589	550-260-23
595	498-172-02
596	498-172-01
597	498-172-03
598	499-384-42
599	499-384-41

Table 2-3. Parcels in Pressure Zone 2

Site ID	APN
63	563-032-07
115	554-570-44S
157	558-033-59S
197	558-492-30
590	554-580-36S
592	563-031-31

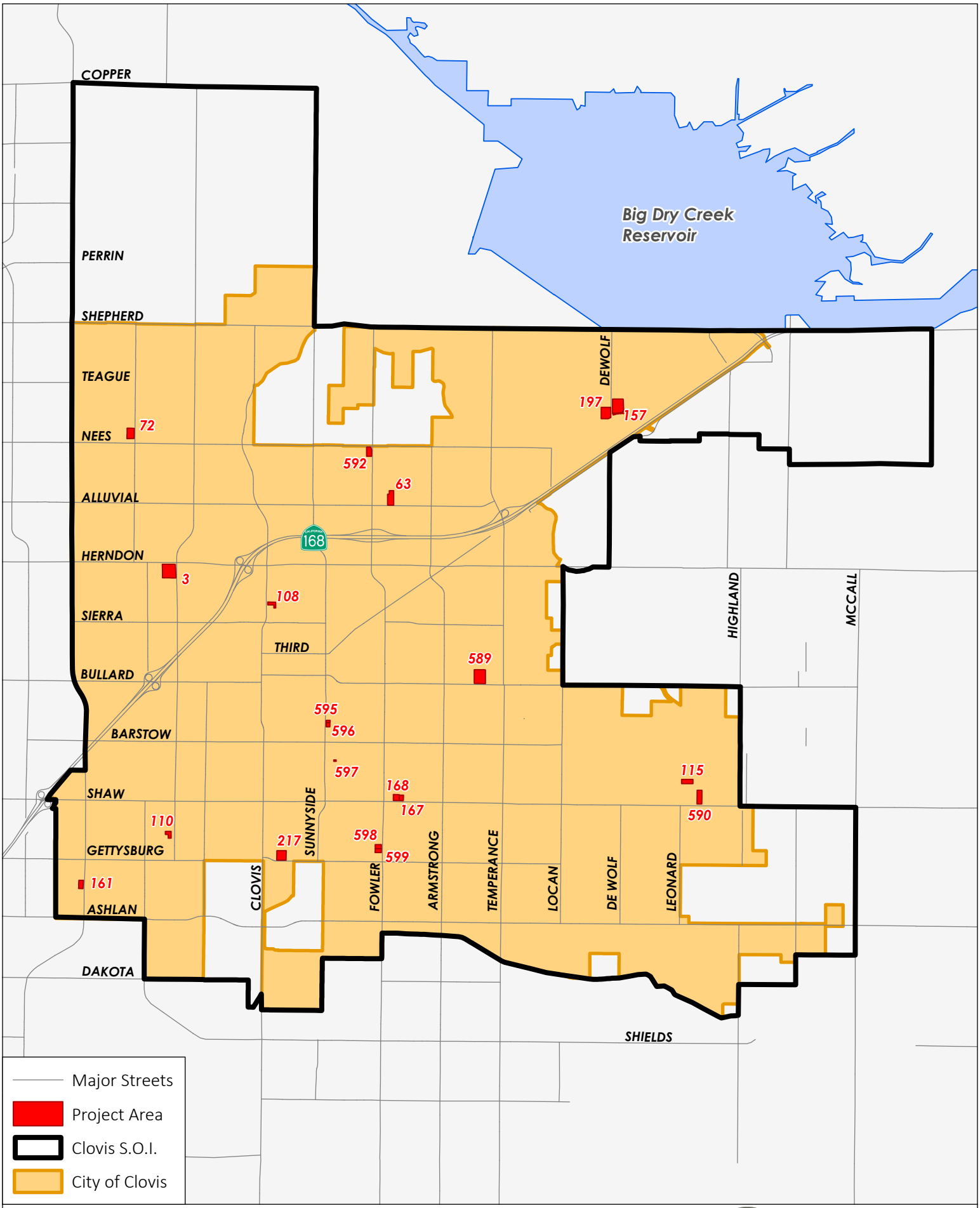
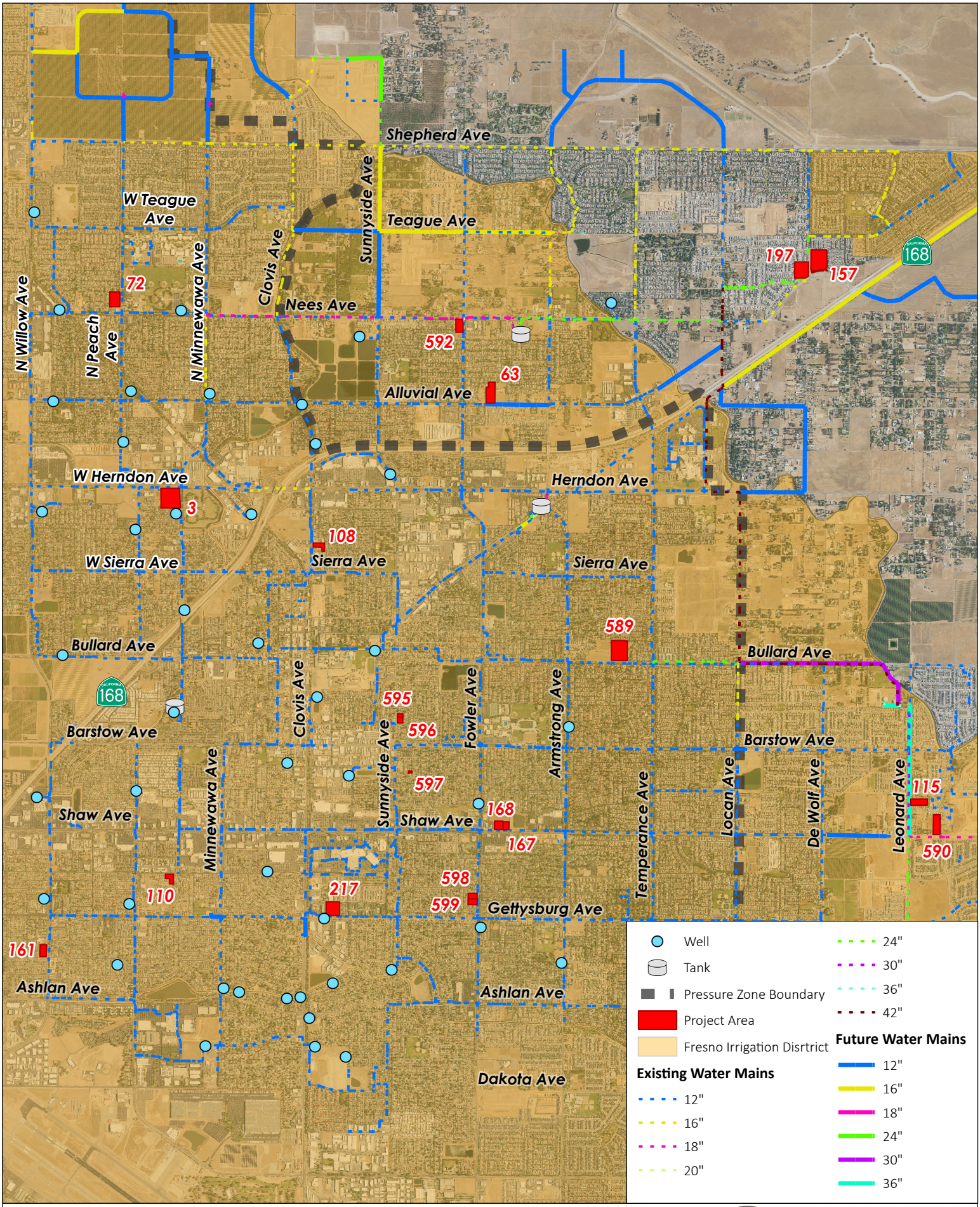


Figure 2-1: Project Location

Water Supply Assessment: Infill Rezone Program

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0 0.5 1
Miles

Figure 2-2: Potable Water Infrastructure

Water Supply Assessment: Infill Rezone Program

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3 WATER DEMANDS

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

3.1 PROJECT DEMANDS

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

Table 3-1. Planned Demand Estimates

Planned Land Use Designation	Site ID	APN	Unit Factor (AFY/acre)	Acreage	Demand (AFY)
General Commercial	3	491-020-42	2.9	8.06	23.37
Low Density Residential	63	563-032-07	2.5	3.78	9.45
Low Density Residential	72	560-082-07	2.5	3.19	7.98
Medium Density Residential	108	491-231-24	2.2	1.25	2.75
Medium Density Residential	110	499-060-74	2.2	1.25	2.75
Medium Density Residential	115	554-570-44S	2.2	2.31	5.08
Mixed-Use Village	157	558-033-59S	5	7.24	36.20
Office	161	430-433-16	2.7	1.67	4.51
Office	167	551-280-04	2.7	1.04	2.81
Office	168	551-280-03	2.7	1.3	3.51
Very Low Density Residential	197	558-492-30	2.9	4.5	13.05
Industrial	217	499-540-13ST	1.0	1.8	1.80
Low Density Residential	589	550-260-23	2.5	8.01	20.03
Medium Density Residential	590	554-580-36S	2.2	3.02	6.64
Low Density Residential	592	563-031-31	2.5	2.09	5.23
Low Density Residential	595	498-172-02	2.5	0.41	1.03
Low Density Residential	596	498-172-01	2.5	0.72	1.80
Low Density Residential	597	498-172-03	2.5	0.41	1.03
Low Density Residential	598	499-384-42	2.5	1.09	2.73
Low Density Residential	599	499-384-41	2.5	1.18	2.95
			Totals:	54.32	154.68

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

Table 3-2. Proposed Demand Estimates

Proposed Land Use Designation	Site ID	APN	Unit Factor (AFY/acre)	Acreage	Demand (AFY)
High Density Residential	3	491-020-42	4.7	8.06	37.88
High Density Residential	63	563-032-07	4.7	3.78	17.77
High Density Residential	72	560-082-07	4.7	3.19	14.99
High Density Residential	108	491-231-24	4.7	1.25	5.88
High Density Residential	110	499-060-74	4.7	1.25	5.88
High Density Residential	115	554-570-44S	4.7	2.31	10.86
High Density Residential	157	558-033-59S	4.7	7.24	34.03
High Density Residential	161	430-433-16	4.7	1.67	7.85
High Density Residential	167	551-280-04	4.7	1.04	4.89
High Density Residential	168	551-280-03	4.7	1.3	6.11
High Density Residential	197	558-492-30	4.7	4.5	21.15
High Density Residential	217	499-540-13ST	4.7	1.8	8.46
High Density Residential	589	550-260-23	4.7	8.01	37.65
High Density Residential	590	554-580-36S	4.7	3.02	14.19
High Density Residential	592	563-031-31	4.7	2.09	9.82
Very High Density Residential	595	498-172-02	7.3	0.41	2.99
Very High Density Residential	596	498-172-01	7.3	0.72	5.26
Very High Density Residential	597	498-172-03	7.3	0.41	2.99
High Density Residential	598	499-384-42	4.7	1.09	5.12
High Density Residential	599	499-384-41	4.7	1.18	5.55
			Totals:	54.32	259.31

While the proposed land use is residential, the intensity of the residential development is greater than the GP land uses; therefore, the proposed water demand estimates are greater than the planned estimates. The increase in total water demand for the Project area is 104.63 AFY. This increase is attributable to the proposed HDR designation having a higher WDF than that of the originally planned land use designations shown in Table 3-1. Despite the increase in demands for the Project area, the proposed increase amounts to 0.65% of the excess supply for year 2030 the City has in a normal year as shown in Table 7-2 of the 2020 UWMP[1].

Project water demands were calculated in 5-year increments, as shown in Table 3-3, assuming 10 percent of the development by 2025 and the balance by 2035.

[1] The excess supply in a normal year in 2030 is shown in the UWMP as 16,113 AFY; the total demand planned for the area is 154.68 AFY while the proposed demand is 259.31 AFY, yielding an increased demand of 104.63 AFY or 0.65% of the excess supply (104.63/16,113 = 0.65%).

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

	2025	2030	Total
Estimated Demand (AFY)	25.93	233.38	259.31

3.2 DEMANDS OF OTHER EXISTING AND PLANNED DEVELOPMENT

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

Table 3-4. Planned Water Demands by Use Type

Use Type	UWMP Projected Demands in 2030 (AFY)	Proposed Project Demands in 2030	
		Project Demands (AFY)	% of UWMP MFR Demands
MFR	2,715	259.31	9.6%
Totals	2,715	259.31	9.6%

Comparing the total proposed Project water demands in Table 3-2 with the total water demand area analyzed in the UWMP and shown in Table 3-4, the Project makes up a very small portion of the overall water anticipated to be delivered by the City to similar types of uses; however, it is worth noting the additional demands beyond the original planned land use (104.63 AFY) accounts for 3.9% of the MFR projected demands shown in the 2020 UWMP for year 2030.

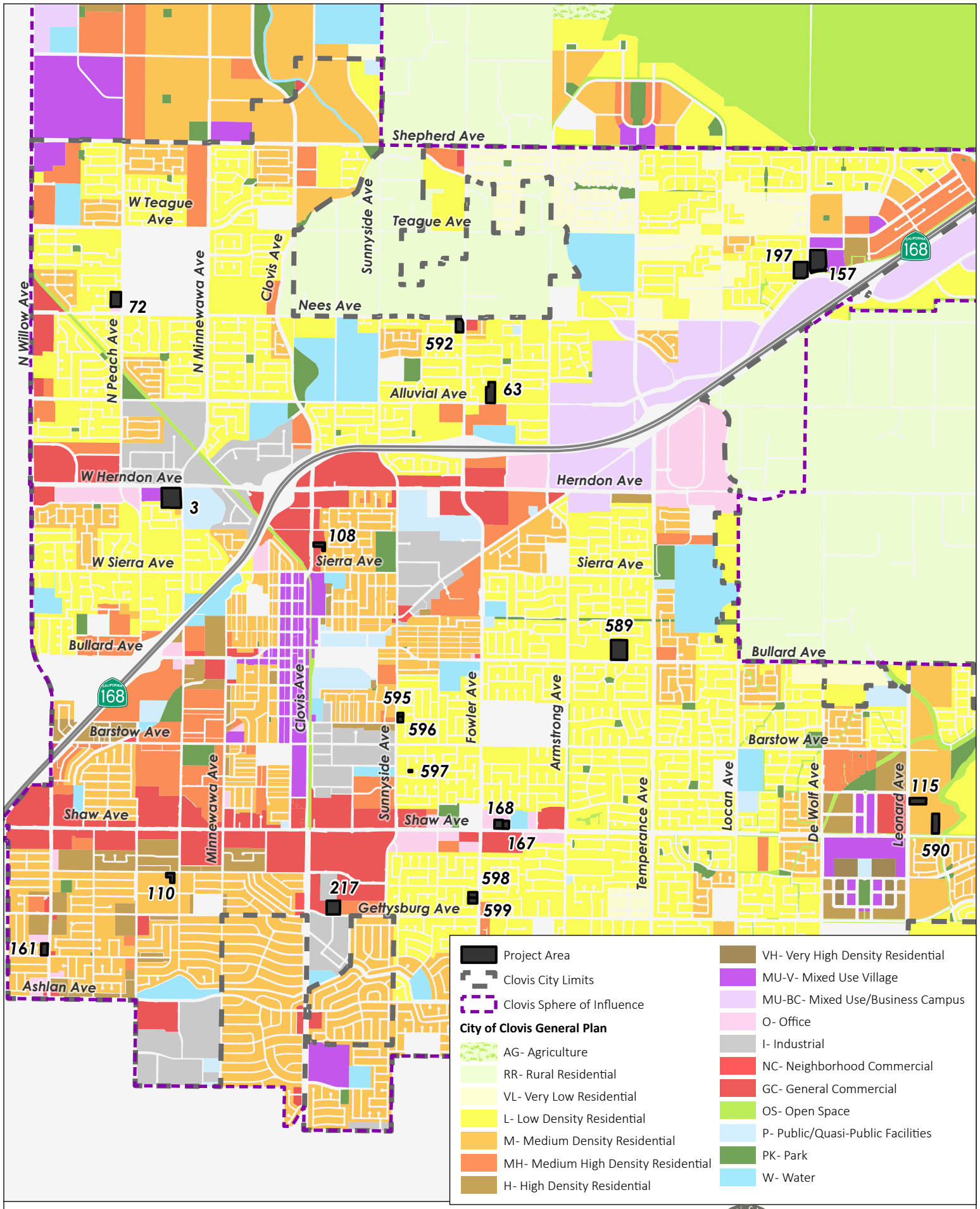


Figure 3-1: Land Use Plan in Project Area

Water Supply Assessment: Infill Rezone Program

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4 OVERVIEW OF WATER SUPPLIES

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

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

4.1 SURFACE WATER

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

4.1.1 KINGS RIVER

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

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

4.1.2 CENTRAL VALLEY PROJECT WATER ALLOCATION: FRIANT DIVISION

The water obtained from the CVP comes from the diversion and storage of water from the San Joaquin River behind Friant Dam. The total available water on the San Joaquin River has been estimated at 2,200,000 acre-feet (AF). Of that, 800,000 AF have been designated as Class I supply (Bureau of Reclamation, 2005). Class I supply is considered to be dependable in most years with shortages only in very dry years. Class II water is in excess of Class I and is therefore much less dependable. FID has a contract with the United States Bureau of Reclamation (USBR) for 75,000 AF of Class II water from this source (Bureau of Reclamation, 2005). The agreement between the City and FID requires the District to make available to the City the proportional share of all surface water available to the District although it does not allow the City to directly receive FID's CVP supplies. Therefore, FID is required to make a like

amount of Kings River (or any other surface) water available to the City for its proportional share of Class II CVP supplies. FID's Class II contract has received an average 13,577 AFY with the actual number ranging from zero to the full 75,000 AF depending upon the nature of each water year over that period. Table 4-1 lists the projected surface water volume through 2040.

4.1.3 GARFIELD WATER DISTRICT

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

4.1.4 INTERNATIONAL WATER DISTRICT

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

4.2 SUPPLY FROM STORAGE

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

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

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

4.3 GROUNDWATER

The City is located within the Kings Groundwater sub-basin, a part of the Tulare Lake Hydrogeologic Basin as described in the Department of Water Resources Bulletin 118 (Department of Water Resources, 2003).

The groundwater basin is in overdraft and has been for many years. However, it has not been adjudicated.

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

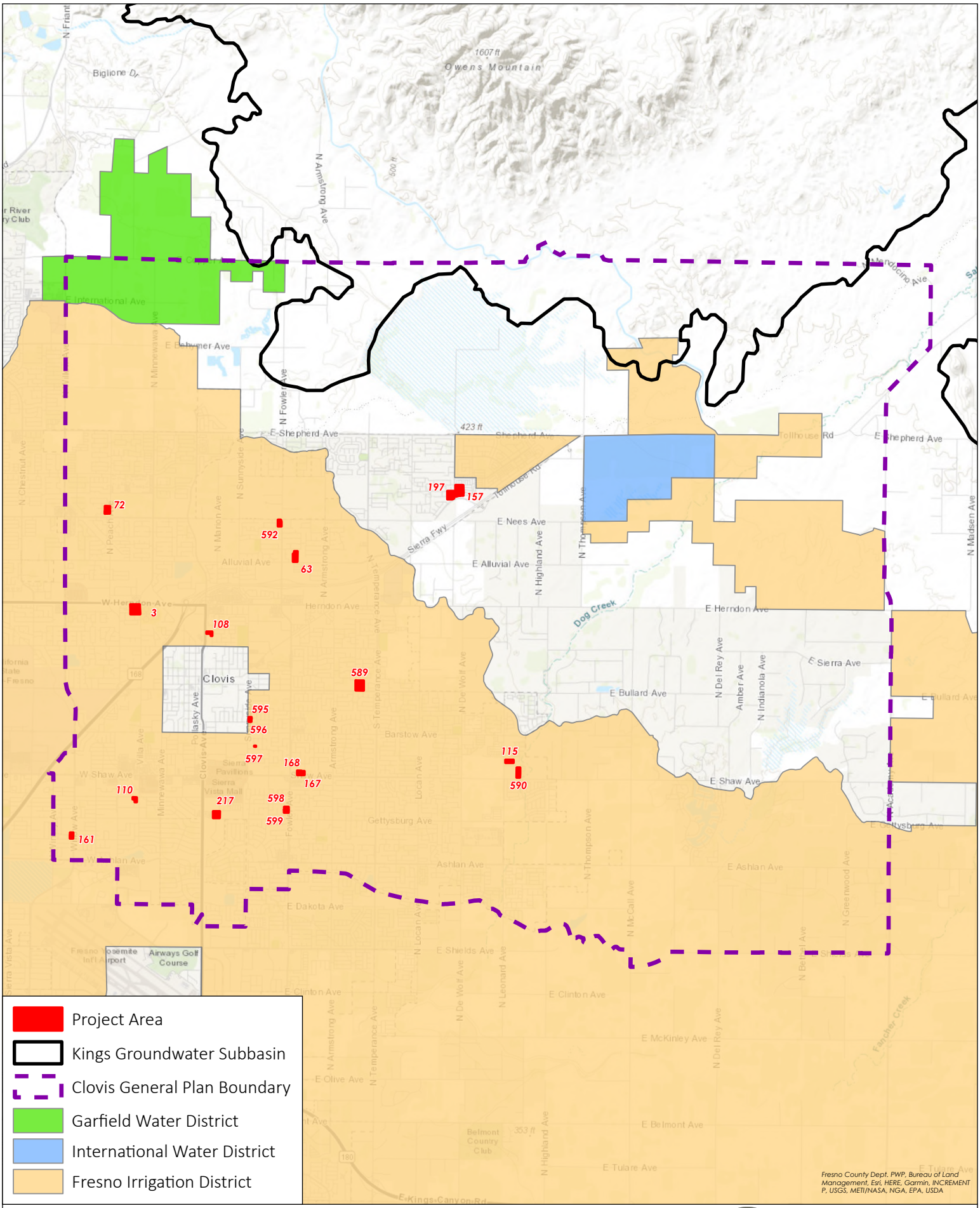


Figure 4-2: Irrigation and Water Districts

Water Supply Assessment: Infill Rezone Program

PROVOST& PRITCHARD

4.4 RECYCLED WATER

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

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

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

To affect that increase in use, the City now requires all new development of public landscape near recycled water transmission lines to use recycled water. Additional actions include extending the recycled water distribution system to discharge at groundwater recharge facilities and reducing the cost of recycled water. The UWMP indicates planned use of recycled water supply will be 9,400 AFY by 2040 (UWMP Table 6-13). With a planned[2] recycled water transmission main in Shepherd Avenue, it is possible this Project may use recycled water for landscape irrigation, but the City will make final determination of that at a later date.

4.5 EXCHANGES

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

4.6 WATER SUPPLY SUMMARY

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

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

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

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

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

Notes:

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

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

5 NORMAL YEAR WATER OPERATIONS

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

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

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

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

6 SINGLE-DRY AND MULTIPLE-DRY YEAR WATER SUPPLIES

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

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

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

6.1 WATER YEAR EFFECTS ON WATER SOURCES

6.1.1 KINGS RIVER SURFACE WATER

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

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

6.1.2 FRIANT CVP SURFACE WATER

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

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

6.1.3 SUPPLY FROM STORAGE

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

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

6.1.4 GROUNDWATER

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

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

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

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

6.1.5 RECYCLED WATER

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

6.2 CHANGES IN WATER SOURCE RELIABILITY OVER THE PLANNING HORIZON

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

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

6.3 SUMMARY OF SINGLE-DRY AND MULTIPLE-DRY YEAR RELIABILITY OVER THE PLANNING HORIZON

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

The supplies that would be available during single-dry and multiple-dry years in 2030 (at assumed Project buildout) are summarized in Table 6-1. As shown, adequate supplies would be available to supply the City and along with the estimated Project demand of 259.3 AFY, under all studied conditions. Further, the excess demand associated with the Project (104.6 AFY), over the originally planned land use, accounts for 13.7 percent of the excess supply without conservation and 1.7 percent of excess supply with conservation in the most critical year analyzed – the Single Dry Year. The City has a Water Shortage Contingency Plan (WSCP) (Provost & Pritchard Consulting Group 2021) in place that could be partially or fully implemented if needed or mandated. The 'demand with conservation' values are reduced to reflect implementation of various stages of the WSCP, as discussed in the UWMP.

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

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

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

6.4 CLIMATE-BASED RELIABILITY FACTORS

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

7 OPERATIONAL RELIABILITY

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

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

8 CONCLUSIONS

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

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

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

8.1 CONCLUSIONS INCLUDING ADDITIONAL WSAs

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

Table 8-1. Summary of Project Water Supplies and Demand Including WSAs

2020 UWMP Supply and Demand Comparison Results	Normal Year (2030)	Single-Dry Year	Multiple-Dry Year				
			Year 1	Year 2	Year 3	Year 4	Year 5
Excess/<Deficit> in Supply	16,113	763	11,783	9,752	5,486	762	15,168
Excess/<Deficit> in Supply with Conservation	--	6,228	15,185	15,614	14,341	13,112	17,235
Additional Demands Associated with WSAs prepared since 2020 UWMP							
Home Place Master Plan (Approved March 2021)	No Additional Demands Associated with Home Place Master Plan WSA						
Tract 6205 SOI Expansion (Approved May 2024)	256	256	256	256	256	256	256
Tract 6343 (Approved May 2024)	79	79	79	79	79	79	79
Vista Ranch SOI Expansion	439	439	439	439	439	439	439
Infill Rezone Program	105	105	105	105	105	105	105
Excess/<Deficit> in Supply including Additional Demands from WSAs	**15,234**	**<116>**	**10,904**	**8,873**	**4,607**	**<117>**	**14,289**
Excess/<Deficit> in Supply with Conservation including Additional Demands from WSAs	**--**	**5,481**	**14,438**	**14,867**	**13,594**	**12,365**	**16,488**

The demands in Table 8-1 include those demands noted in the UWMP, the additional demands associated with the Project evaluated in this WSA (105 AFY), as discussed in Section 2.2, and the additional demands discussed in the previously prepared WSAs. Similarly, the noted Excess/Deficit reflects the difference between these summated demands and the total supply noted in the UWMP. This approach accounts for the additional demands associated with the proposed land use type above the demands associated with the originally planned land use type. The project creates a deficit of supply in the Single-Dry year and Year 4 of the Multiple-Dry Year. Scenarios in the amount of 116 AFY and 117 AFY if conservation measures are not implemented. Assuming conservation measures would be implemented and effective, the deficit can be mitigated through conservation measures.

9 REFERENCES

Bureau of Reclamation. (2005, June). Upper San Joaquin River Basin Storage Basin Investigation. https://www.usbr.gov/mp/sccao/storage/docs/initial-alt-info/ta-iai-03-vol2-water-ops-ta.pdf.

Department of Water Resources. (2003). *Bulletin 118 - California's Groundwater.* Sacramento.

Placeworks. (2014). *General Plan, City of Clovis.* Clovis.

Provost & Pritchard Consulting Group. (2018). *City of Clovis, Water Master Plan Update, Phase III.* Clovis.

Provost & Pritchard Consulting Group. (2021). *City of Clovis, 2020 Urban Water Management Plan Update.* Clovis.

4 Mitigation Monitoring and Reporting Program

This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Assessment (Final EA), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

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Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Air Quality							
GP EIR MM 3-1							
Prior to issuance of any construction permits, development project applicants shall prepare and submit to the City of Clovis Planning Division a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the SJVAPCD adopted thresholds of significance, as identified in the Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI), the City of Clovis Planning Division shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division. Mitigation measures to reduce construction-related emissions could include, but are not limited to: ▪ Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3, Tier 4, or more stringent emission limits, applicable for engines between 50 and 750 horsepower. A list of construction equipment by type and model year shall be maintained by the construction contractor onsite, which shall be available for City review upon request. ▪ Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. ▪ Use of alternative-fueled or catalyst-equipped diesel construction equipment, if available and feasible. ▪ Clearly posted signs that require operators of trucks and construction equipment to minimize idling time (e.g., 5-minute maximum). ▪ Preparation and implementation of a fugitive dust control plan that may include the following measures: ▫ Disturbed areas (including storage piles) that are not being actively utilized for construction purposes shall be effectively stabilized using water, chemical stabilizer/suppressant, or covered with a tarp or other suitable cover (e.g., revegetated). ▫ Onsite unpaved roads and offsite unpaved access roads shall be effectively stabilized using water or chemical stabilizer/suppressant. ▫ Land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and demolition activities shall be effectively controlled utilizing application of water or by presoaking. ▫ Material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained when materials are transported offsite. ▫ Operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or	**Requirements:** Ensure construction-related air quality impacts are in conformance with SJVAPCD methodology and that impacts are below adopted thresholds by implementing construction-phase air quality mitigation measures and entering into a VERA with SJVAPCD. **Documentation**: A construction air quality technical assessment, fugitive dust control plan, construction documents incorporating required air quality mitigation measures, onsite equipment inventory list, and an executed VERA with SJVAPCD, if applicable, shall be submitted to the City.	Prior to issuance of any construction permits. Air quality mitigation measures shall be implemented throughout construction.	The Applicant will ensure projects incorporate necessary mitigation measures into construction documents to reduce air pollutant emissions during construction activities to below SJVAPCD adopted thresholds of significance.	City of Clovis Planning Division.			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.) ▫ Following the addition of materials to or the removal of materials from the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. ▫ Within urban areas, trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. ▫ Any site with 150 or more vehicle trips per day shall prevent carryout and trackout. ▫ Limit traffic speeds on unpaved roads to 15 mph. ▫ Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than 1 percent. ▫ Install wheel washers for all exiting trucks or wash off all trucks and equipment leaving the project area. ▫ Adhere to Regulation VIII's 20 percent opacity limitation, as applicable. Enter into a Voluntary Emissions Reduction Agreement (VERA) with the San Joaquin Valley Air Pollution Control District (SJVAPCD). The VERA shall identify the amount of emissions to be reduced, in addition to the amount of funds to be paid by the project applicant to the SJVAPCD to implement emission reduction projects required for the project.							
GP EIR MM 3-2							
Prior to discretionary approval, applicants for phased development projects (i.e., construction would overlap operation/opening of the project) involving residential land uses shall coordinate with the San Joaquin Valley Air Pollution Control District (SJVAPCD) or the City of Clovis (City) in conjunction with the SJVAPCD in preparation of a health risk assessment (HRA) for construction activities. If the construction HRA identifies risk impacts that exceed the standards as determined by the SVJAPCD at the time the project is considered, it shall identify measures to reduce these impacts to below these standards. Recommended measures may include those identified in GP EIR MM 3-1. The recommendations of the construction HRA shall be incorporated into all construction management plans which shall be submitted to the City and verified by the City's Planning Division.	**Requirements** The Applicant shall prepare a construction HRA in coordination with SJVAPCD or the City of Clovis in conjunction with SJVAPCD for phased residential development projects where construction would overlap with operation or occupancy. If the construction HRA identifies health risks exceeding applicable SJVAPCD standards, the Applicant shall incorporate mitigation measures into all applicable construction management plans submitted to the City. **Documentation:** A construction HRA and construction management plans incorporating identified mitigation measures.	Prior to project approval at the time of project consideration. Required mitigation measures shall be implemented throughout construction.	The City of Clovis Planning Division shall review the construction HRA and verify incorporation and implementation of required mitigation measures during construction.	City of Clovis Planning Division			
GP EIR MM 3-4							
Prior to discretionary project approval, the City of Clovis (City) shall evaluate new development proposals for sensitive land uses (e.g., residential, schools, day care centers) within the City for potential incompatibilities with regard to the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective.[1] Applicants for sensitive land uses that are within the recommended buffer distances shall submit a health risk assessment (HRA) to the City prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the San Joaquin Valley Air Pollution Control District (SJVAPCD). The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6	**Requirement:** The Applicant shall prepare a project-specific HRA for sensitive land uses located within recommended buffer distances in accordance with OEHHA guidelines and SJVAPCD policies. If the HRA identifies applicable SJVAPCD thresholds will be exceeded, the Applicant shall identify mitigation measures to reduce risks and incorporate such measures into the project design, site development plans, and building plans submitted to the City. **Documentation:** A project-specific HRA and project plans incorporating identified mitigation measures, including	Prior to project approval by the Planning Division and included on building plans.	The City of Clovis Planning Division shall review the HRA and verify incorporation of required mitigation measures into project and building plans.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
years. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), the appropriate noncancer hazard index exceeds 1.0, or the thresholds established by the SJVAPCD at the time a project is considered, the applicant shall be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk impacts may include but are not limited to the following: ▪ Placement of air intakes away from high-volume roadways and/or truck loading zones. ▪ Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters. ▪ Heating, ventilation, and air conditioning systems for units that are installed with MERV filters shall maintain positive pressure within the building's filtered ventilation system to reduce infiltration of unfiltered outdoor air. Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning Division.	building plans reflecting air intake design and filtration requirements.						
Biological Resources							
GP EIR MM 4-1 Biological Assessment and Focused Surveys							
GP EIR MM 4-1 Biological Assessment and Focused Surveys. The City shall require for future development or redevelopment projects that disturb vegetated, vacant land pursuant to prepare a biological resources survey. The survey shall be conducted by a qualified biologist. The biological resources survey shall include, but not be limited to: • Analysis of available literature and biological databases, such as the California Natural Diversity Database, to determine sensitive biological resources that have been reported historically from the proposed development project vicinity. • Review of current land use and land ownership within the proposed development project vicinity. • Assessment and mapping of vegetation communities present within the proposed development project vicinity. • Evaluation of potential local and regional wildlife movement corridors. • General assessment of potential jurisdictional areas, including wetlands and riparian habitats o If the proposed development project site supports vegetation communities that may provide habitat for special status plant or wildlife species, a focused habitat assessment shall be conducted by a qualified biologist to determine the potential for special status plant and/or animal species to occur within or adjacent to the proposed development project area. o If one or more special status species has the potential to occur within the proposed development project area, focused species surveys shall be conducted to determine the presence/absence of these species to	**Requirements:** The Applicant shall retain a qualified biologist to prepare a biological resources survey for projects that disturb vegetated, vacant land. If suitable habitat for special-status species is identified, the Applicant shall conduct focused habitat assessments and species-specific focused surveys, and additional preconstruction surveys if required due to delayed initiation of construction. **Documentation:** A biological resources survey letter report or biological resources technical report prepared by a qualified biologist.	Prior to project approval. Additional preconstruction surveys shall be conducted if required prior to the start of construction.	A qualified biologist shall conduct the required biological resources survey and any focused or preconstruction surveys and the City of Clovis Planning Division shall review the biological resources survey and verify completion of any required focused or preconstruction surveys.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
adequately evaluate potential direct and/or indirect impacts to these species. ○ If construction activities are not initiated immediately after focused surveys have been completed, additional preconstruction special status species surveys may be required, in accordance with the California Endangered Species Act and Federal Endangered Species Act, to assure impacts are avoided or minimized to the extent feasible. If preconstruction activities are required, a qualified biologist will perform these surveys as required for each special status species that is known to occur or has a potential to occur within or adjacent to the proposed development project area. The results of the biological survey shall be presented in a biological resources survey letter report (for proposed development projects with no significant impacts) or biological resources technical report (for proposed development projects with significant impacts that require mitigation to reduce the impacts to below a level of significance) and submitted to the City's Planning Director.							
GP EIR MM 4-2 Resource Impact Avoidance/Minimization							
Project applicants shall avoid potential impacts to sensitive or protected biological resources. Avoidance may include: • establishing appropriate no-disturbance buffers (consultation with relevant regulatory agencies may be required to establish suitable buffer areas) • initiating construction at a time when special status or protected animal species will not be vulnerable to project-related mortality (e.g. outside the avian nesting season or bat maternal or wintering roosting season). Minimizing impact by measures such as: ○ exclusion and/or silt fencing; ○ relocation of impacted resources; ○ construction monitoring by a qualified biologist; ○ training program by a qualified biologist for construction personnel on sensitive biological resources.	**Requirements:** The Applicant shall implement feasible avoidance and minimization measures to reduce impacts to sensitive or protected biological resources, as identified through project-specific biological resources surveys and any focused surveys. **Documentation**: Project plans, construction management plans, and biological documentation identifying and incorporating required avoidance and minimization measures.	Prior to and during construction, as applicable.	The City of Clovis Planning Division shall verify incorporation and implementation of required avoidance and minimization measures, and a qualified biologist shall conduct construction monitoring and training if required by the approved biological documentation.	City of Clovis Planning Division			
GP EIR MM 4-3 Compensatory Mitigation							
If project-related impacts cannot be avoided or minimized to less than significant in accordance with Mitigation Measure 4-3; feasible, compensatory mitigation shall be developed by a qualified biologist and implemented to reduce impacts to sensitive or protected biological resources. Mitigation may include but is not limited to: • Compensation for lost habitat or waters in the form of preservation or creation of in-kind habitat or waters, either onsite or offsite, protected by conservation easement; • Purchase of appropriate credits from an approved mitigation bank servicing the Clovis General Plan Update Area; • Payment of in-lieu fees.	**Requirements:** The Applicant shall develop and implement compensatory mitigation prepared by a qualified biologist, where avoidance and minimization measures are not sufficient. **Documentation:** A compensatory mitigation plan prepared by a qualified biologist and documentation of mitigation implementation.	Prior to project approval, or prior to initiation of ground-disturbing activities if mitigation requirements are determined following project approval.	The City of Clovis Planning Division shall review and approve compensatory mitigation documentation and verify implementation of required mitigation measures.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
GP EIR MM 4-4 Jurisdictional Wetlands							
The City shall require applicants of development projects that have the potential to affect jurisdictional resources, to contract with a qualified biologist to conduct a jurisdictional delineation following the methods outlined in the US Army Corps of Engineers Wetland Delineation Manual to map the extent of wetlands and nonwetland waters, determine jurisdiction, and assess potential impacts. The results of the delineation shall be presented in a wetland delineation letter report and shall be incorporated into the CEQA document(s) required for approval and permitting of the proposed development project. Applicants of development projects that have the potential to impact jurisdictional features shall obtain permits and authorizations from the US Army Corps of Engineers, California Department of Fish and Wildlife, and/or Central Valley Regional Water Quality Control Board. The agency authorization would include impact avoidance and minimization measures as well as mitigation measures for unavoidable impacts. Specific avoidance, minimization, and mitigation measures for impacts to jurisdictional resources shall be determined through discussions with the regulatory agencies during the proposed development project permitting process and may include monetary contributions to a mitigation bank or habitat creation, restoration, or enhancement.	**Requirements:** The Applicant shall retain a qualified biologist to prepare a jurisdictional delineation in accordance with the U.S. Army Corps of Engineers Wetland Delineation Manual to identify wetlands and nonwetland waters and assess potential impacts. If project impacts to jurisdictional resources are identified, the Applicant shall obtain all required permits and authorizations from the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and/or Central Valley Regional Water Quality Control Board, and shall implement all avoidance, minimization, and mitigation measures required by such authorizations. **Documentation:** A wetland delineation letter report and copies of all applicable regulatory permits and authorizations.	Prior to Planning approval and prior to issuance of permits affecting jurisdictional resources.	The City of Clovis Planning Division shall review the jurisdictional delineation and verify receipt and implementation of required regulatory permits and associated mitigation measures.	City of Clovis Planning Division			
Cultural Resources							
CUL-1 Identification of Historical Resources							
A historical resources evaluation shall be prepared prior to demolition or alteration for properties listed in Table 4.4-4 to evaluate existing structures on site. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualifications Standards (PQS) in architectural history or history. The qualified architectural historian or historian shall conduct an intensive-level evaluation in accordance with the guidelines and best practices promulgated by the State Office of Historic Preservation to identify potential historical resources within the proposed rezone site. Properties 45 years of age or older shall be evaluated within their historic context and documented in a report meeting the State Office of Historic Preservation guidelines. Evaluated properties shall be documented on applicable Department of Parks and Recreation Series 523 Forms. The report must be submitted to the City for review and concurrence. The final report must be submitted to the South San Joaquin Valley Information Center. If the property is already a historical resource as defined by CEQA Guidelines Section 15064.5(a), the historical resources evaluation described above shall not be required.	**Requirements:** The Applicant shall retain a qualified architectural historian or historian meeting the Secretary of the Interior's Professional Qualifications Standards to prepare a historical resources evaluation prior to demolition or alteration of applicable properties. **Documentation:** A historical resources evaluation report and completed DPR 523 forms submitted to the City for review and concurrence, and final submittal to the South San Joaquin Valley Information Center.	Prior to issuance of permits for demolition or alteration of a historical resource.	The City of Clovis Planning Division shall review and approve historical resource mitigation documentation and verify completion of required mitigation measures prior to issuance of demolition or alteration permits.	City of Clovis Planning Division			
CUL-2 Treatment of Historical Resources							
If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance). Mitigation may include avoidance, preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior's Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a	**Requirement:** For projects affecting a historical resource, the Applicant shall retain a qualified historic resources professional and implement mitigation measures consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. **Documentation:** A mitigation report and documentation of any additional site-specific mitigation measures submitted to the City for review and approval.	Prior to issuance of permits for demolition or alteration of a historical resource.	The City of Clovis Planning Division shall review and approve historical resource mitigation documentation and verify completion of required mitigation measures prior to issuance of demolition or alteration permits.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
significant adverse direct or indirect impact to historical resources.[2] A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits. If historical resources are identified and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, reports similar to Historic American Buildings Survey (HABS), interpretive signage, and relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.							
CUL-3 Archaeological Resources Study							
For future projects involving ground disturbance on any of the 20 Infill Rezone Program sites the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the South San Joaquin Valley Information Center, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval. If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.	**Requirement:** For projects involving ground disturbance, the Applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards to prepare a Phase I archaeological resources assessment and implement any additional archaeological testing, monitoring, avoidance, or mitigation measures, as required. **Documentation**: A Phase I archaeological resources assessment report and any subsequent archaeological reports or mitigation documentation submitted to the City for review and approval.	Prior to project approval. Additional archaeological measures shall be completed prior to or during construction, as applicable.	The City of Clovis Planning Division shall review archaeological documentation and verify completion of required mitigation and monitoring prior to or during construction, as applicable.	City of Clovis Planning Division			
CUL-4 Unanticipated Discovery of Archaeological Resources							
In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data	**Requirement:** If archaeological resources are encountered during ground-disturbing activities, the Applicant shall halt work within 50 feet of the discovery, retain a qualified archaeologist to evaluate the resource, consult with a Native American representative if the resource is prehistoric, and implement testing, data recovery, and mitigation as required. **Documentation:** Archaeological evaluation documentation, any required testing or data recovery plans, and final archaeological reports submitted to the City and the appropriate California Historical Resources Information System repository.	During ground-disturbing activities, as applicable.	The City shall review and approve archaeological evaluation and treatment documentation and verify completion of required mitigation and reporting.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).							
Greenhouse Gas Emissions							
GHG-1 Greenhouse Gas Emissions Reductions							
Development on the 20 Infill Rezone Program sites shall be encouraged to not include natural gas appliances or natural gas plumbing; shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	**Requirements:** The Applicant shall avoid the use of natural gas appliances and natural gas plumbing when feasible, and to design the project to comply with off-street electric vehicle requirements contained in the most recently adopted version of CALGreen Tier 2. **Documentation:** Project plans demonstrating compliance with applicable CALGreen Tier 2 off-street electric vehicle requirements, if implemented.	Prior to project approval and building permit issuance.	The City of Clovis Planning Division shall review project plans for consistency with applicable CALGreen Tier 2 off-street electric vehicle requirements, if implemented.	City of Clovis Planning Division			
Noise							
NOI-1 Measures to Reduce Construction Noise							
To minimize noise during construction, the City of Clovis shall require construction contractors to implement the following measures for construction activities conducted within the City for the 20 Infill Rezone Program sites. Construction plans submitted to the City shall include construction noise analysis and identify these measures on demolition, grading, and construction plans submitted to the City. The City of Clovis Building Division shall verify that grading, demolition, and/or construction plans submitted to the City include these notations prior to issuance of demolition, grading and/or building permits. • **Mufflers.** During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. • **Stationary Equipment.** All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. • **Equipment Staging Areas.** Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers. • **Smart Back-up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations. • **Electrically-Powered Tools and Facilities.** Electrical power shall be used to run air compressors and similar power tools and to	**Requirements:** For construction activities on the 20 Infill Rezone Program sites, the Applicant shall incorporate and implement required construction noise minimization measures in project plans and ensure that construction contractors comply with these measures during demolition, grading, and construction. **Documentation:** Construction noise analysis and demolition, grading, and construction plans identifying required noise minimization measures.	Prior to issuance of demolition, grading, and/or building permits and throughout construction.	The City of Clovis Building Division shall verify that construction plans include required noise minimization measures prior to permit issuance. The Applicant or their designee shall implement measures during demolition, grading, and construction at the project sites. Planning Division staff shall verify with the Building Division.	City of Clovis Building Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
power any temporary structures, such as construction trailers or caretaker facilities, where feasible. • **Noise Disturbance Coordinator.** The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator and the City shall be posted at the construction site. **Temporary Noise Barriers.** Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) or when the anticipated construction duration is greater than is typical (e.g., two years or greater) and there are sensitive receptors within 500 feet of the construction site. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least one pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.							
NOI-2 Measures to Reduce Construction Vibration							
Prior to issuance of a building permit for a project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. ▪ Pile driving during construction within 135 feet of fragile structures such as historical resources ▪ Pile driving during construction within 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings) ▪ Pile driving during construction within 75 feet of engineered concrete and masonry (no plaster) ▪ Use of a vibratory roller within 40 feet of fragile historical resources or 25 feet of any other structure ▪ Use of a dozer or other large earthmoving equipment within 20 feet for a fragile historical structure or 15 feet of any other structure This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed Federal Transit Administration (FTA) architectural damage thresholds (e.g., 0.12 in/sec peak particle velocity (PPV) for fragile or historical resources, 0.2 in/sec PPV for non-engineered timber and masonry buildings, and 0.3 in/sec PPV for engineered concrete and masonry). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If necessary, construction vibration monitoring shall be conducted to verify FTA vibration thresholds are not exceeded.	**Requirements:** For projects involving pile driving or vibration-intensive construction activities within prescribed distances of nearby structures, the Applicant shall retain a qualified acoustical consultant or engineer to prepare a groundborne noise and vibration analysis and implement required construction methods or monitoring to ensure vibration levels do not exceed applicable FTA thresholds. **Documentation:** A groundborne noise and vibration analysis and any required construction method revisions or vibration monitoring plans submitted to the City.	Prior to issuance of a building permit.	The City of Clovis Building Division shall review the groundborne noise and vibration analysis and verify implementation of required construction methods or vibration monitoring, as applicable.	City of Clovis Building Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Transportation							
T-2a Street Network							
For individual development projects within the Infill Rezone Program that will include an internal street network, provide a well-connected street network, particularly for non-motorized connections. Characteristics of street network connectivity include short block lengths, numerous three and four-way intersections, and minimal dead-ends (cul-de-sacs). Street connectivity helps to facilitate shorter vehicle trips and greater numbers of walk and bike trips and thus a reduction in VMT. The CAPCOA Handbook[3] Measure T-17 uses increased vehicle intersection density as a proxy for street connectivity improvements. The CAPCOA Handbook estimates that VMT can be reduced up to 30 percent if a development provides a street grid that has much greater density (up to about three times) of streets and street intersections than the average American street grid density of 36 street intersections per square mile.	**Requirements:** For projects that include an internal street network, the Applicant shall design the street network consistent with CAPCOA Handbook Measure T-17. **Documentation:** Site plans and circulation plans demonstrating compliance with street network connectivity design principles.	During project design and prior to project approval	The City of Clovis Planning Division shall review site and circulation plans to verify incorporation of required street network connectivity features. Planning Division staff shall coordinate with the Engineering Division Staff.	City of Clovis Planning Division			
T-2b Bicycle Network							
For individual development projects within the Infill Rezone Program, contribute to increasing the length of the area bicycle network, including separated trails available to bicycles as well as on-street bike lanes. The CAPCOA Handbook Measure T-20 estimates that a 20 percent increase in bike network mileage could reduce citywide VMT by 0.01 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so this increase in bike network would reduce daily VMT by approximately 430. Note that these VMT reductions would occur citywide and would not exclusively affect project trips.	**Requirements:** On project sites, the Applicant shall contribute to expansion of the bicycle network by providing or supporting separated bicycle facilities and/or on-street bicycle lanes, consistent with project design and site conditions. **Documentation:** Project plans or circulation plans identifying proposed bicycle facilities or contributions to the area bicycle network.	During project design and prior to project approval.	The City of Clovis Planning Division shall review project plans to verify that bicycle facilities or bicycle network contributions are identified, as applicable. Planning Division staff shall coordinate with the Engineering Division Staff.	City of Clovis Planning Division			
T-2c Transit Service							
For individual development projects within the Infill Rezone Program, contribute to implementation of expanded transit service in Clovis, including potentially extending service to the project areas. Implementation of expanded transit service would require both capital expenditures for support facilities, including construction of transit stops and facilitating extensions of future transit routes. The CAPCOA Handbook Measure T-25 estimates that a 25 percent increase in transit service hours could reduce citywide VMT by 0.3 percent. The total daily VMT generated in Clovis is approximately 4,285,900, so the expanded transit network would reduce daily VMT by approximately 12,850. Note that these VMT reductions would occur citywide and would not exclusively affect project trips.	**Requirements:** For projects sites, the Applicant shall contribute to implementation of expanded transit service by supporting transit facilities, transit stop improvements, and/or measures that facilitate extension of future transit routes, as applicable. **Documentation:** Project plans or improvement plans identifying proposed transit-related facilities, improvements, or contributions.	During project design and prior to project approval.	The City of Clovis Planning Division shall review project plans to verify that transit-related facilities or contributions are identified, as applicable. Planning Division staff shall coordinate with the Engineering Division Staff.	City of Clovis Planning Division			
Tribal Cultural Resources							
TCR-1 Inadvertent Discoveries During Construction							
In the event that cultural resources of Native American origin are identified during grading or construction, all earth disturbing work within a 50-foot radius of the find shall be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the find; an appropriate Native American representative, based on the nature of the find, is consulted; and mitigation measures are put in place for the disposition and protection of any find pursuant to Public Resources Code Section 21083.2. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource (TCR) and thus significant under the California Environmental Quality Act, a mitigation plan shall be prepared and implemented in	**Requirements:** If cultural resources of Native American origin are encountered during grading or construction, the Applicant shall halt work within 50 feet of the discovery, retain a qualified archaeologist to evaluate the find, consult with an appropriate Native American representative, and implement avoidance or other mitigation measures for the protection and disposition of the resource, as required. **Documentation:** Evaluation documentation, consultation records, and any required tribal cultural resource mitigation plan submitted to the City.	During grading or construction, as applicable, and prior to resumption of earth-disturbing activities in the vicinity of the find.	The City of Clovis shall review evaluation findings, consultation outcomes, and any required mitigation plan, and verify implementation prior to resumption of earth-disturbing activities.	City of Clovis Planning Division			

Mitigation Measure/Condition of Approval	Action Required	Timing	Monitoring Requirements	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
accordance with state guidelines and in consultation with local Native American group(s) prior to continuation of any earth disturbing work within the vicinity of the find. The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for TCRs include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery through capping in place, excavation and removal of the resource, interpretive displays, sensitive area signage, or other mutually agreed upon measures.							

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RESOLUTION 26-__

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CLOVIS APPROVING GENERAL PLAN AMENDMENT 2024-003 TO AMEND THE 2014 CLOVIS GENERAL PLAN LAND USE ELEMENT AND APPLICABLE SPECIFIC AND MASTER PLANS FOR APPROXIMATELY 54 ACRES OF PROPERTY LOCATED THROUGHOUT THE CITY OF CLOVIS FROM VARIOUS LAND USE DESIGNATIONS TO THE HIGH DENSITY RESIDENTIAL (20.1-30 DWELLING UNITS PER ACRE) AND VERY HIGH DENSITY RESIDENTIAL (25.1-43 DWELLING UNITS PER ACRE) LAND USE DESIGNATIONS

WHEREAS, the City of Clovis ("City"), 1033 Fifth Street, Clovis CA, 93619, initiated an application for General Plan Amendment (GPA) 2024-003 to amend the 2014 General Plan, Herndon-Shepherd Specific Plan (HSSP), Loma Vista Specific Plan (LVSP), Harlan Ranch Master Plan, and the Shaw Avenue Specific Plan (SASP); and

WHEREAS, the initiation of the project was required in conjunction with the terms of the judgment entered in the *Martinez v. City of Clovis* case, whereby the City is required to rezone properties as part of the Infill Rezone Program in order to bring the City's Housing Element into compliance with applicable state law, which includes approximately 54 acres (20 sites) throughout the City of Clovis; and

WHEREAS, the amendments to the specific/master plans only apply to nine (9) of the 20 sites; and

WHEREAS, to ensure consistency between the zoning and the General Plan land use designations of the 20 sites, the underlying general plan land use designations need to be modified so that the zoning and densities do not conflict; and

WHEREAS, the City proposes to amend the above mentioned plans for approximately 54 acres (20 sites) throughout the City and redesignate the land uses for 20 sites from various land use designations to the High Density Residential (20.1-30 dwelling units per acre (du/ac)) and Very High Density Residential (25.1-43 du/ac) land use designations, as shown in **Attachment A** ("Project") attached hereto and incorporated herein by reference; and

WHEREAS, the City of Clovis worked with Rincon Consultants, Inc. and prepared an Environmental Assessment (EA) for the Project pursuant to Government Code section 65759, which provides that the California Environmental Quality Act does not apply to discretionary actions necessary to bring the Housing Element into compliance with State law pursuant to a court order or judgment; and

WHEREAS, the EA for the Project, dated April 2026, contains a mitigation monitoring and reporting program and collectively makes up the EA for the Project; and

WHEREAS, the City published notice of the public hearing for GPA2024-003 in *The Business Journal* on June 12, 2026, more than 20 days prior to the City Council hearing in accordance with Government Code section 65484, subdivision (b)(2), and otherwise posted and provided written notice of the public hearing in accordance with applicable law; and

WHEREAS, the duly noticed public hearing was held by the City Council on July 6, 2026; and

WHEREAS, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the Project, which is on file with the City's Department of Planning and Development Services, and reviewed and considered those portions of the Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the recommendation(s) of the Clovis Planning Commission, the EA for the Projects, the written materials submitted with the request, and the verbal and written comments, testimony, and other evidence presented during the public hearing ("Administrative Record").

NOW, THEREFORE, BE IT RESOLVED, that the City of Clovis finds and determines as follows:

1. As fully detailed in the analysis in the staff report for this item and Administrative Record, the Project satisfies the following required findings for approval of a general plan amendment, as follows:

    a. GPA2024-003 is internally consistent with the goals, policies, and actions of the General Plan.

    b. GPA2024-003 would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

    c. There is a compelling reason for the amendment, namely that the amendment is required to ensure consistency between the General Plan and Zoning, to bring the City's Housing Element into compliance with applicable state law, and to comply with the judgment entered by the Court in the *Martinez v. City of Clovis* case.

2. The City Council hereby approves GPA2024-003 as described in **Attachment A** attached hereto.

* * * * *

The foregoing resolution was introduced and adopted at a regular meeting of the City Council of the City of Clovis held on August 10, 2026, by the following vote, to wit:

AYES:
NOES:
ABSENT:
ABSTAIN

DATED:

_____ Mayor

_____ City Clerk

Attachment A
General Plan Land Use Changes

Site ID	Assessor's Parcel Number	Address	Existing General Plan Land Use	Proposed General Plan Land Use	Specific Plan/Master Plan
3	49102042	270 W Herndon Ave	General Commercial	High Density Residential	Not Applicable (N/A)
63	56303207	1933 Alluvial Ave	Low Density Residential	High Density Residential	Herndon-Shepherd Specific Plan (HSSP)
72	56008207	437 W Nees Ave	Low Density Residential	High Density Residential	HSSP
108	49123124	125 & 135 N Clovis Ave	General Commercial	High Density Residential	N/A
110	49906074	236 & 256 W Santa Ana Ave	Medium Density Residential	High Density Residential	N/A
115	55457044S	1671 Leonard Ave	Medium Density Residential	High Density Residential	Loma Vista Specific Plan (LVSP)
157	55803359S	None	Mixed Use Village	High Density Residential	Harlan Ranch Master Plan
161	43043316	2930 Willow Ave	Office	High Density Residential	N/A
167	55128004	1871 Shaw Ave	Office	High Density Residential	Shaw Avenue Specific Plan (SASP)
168	55128003	1853 Shaw Ave	Office	High Density Residential	SASP
197	55849230	1497 N Locan Ave	Very Low Density Residential	High Density Residential	HSSP
217	49954013ST (portion)	885 Gettysburg Ave	Industrial	High Density Residential	N/A
589	55026023	2403 Bullard Ave	Low Density Residential	High Density Residential	N/A
590	55458036s	3959 Shaw Ave	Medium Density Residential	High Density Residential	LVSP

592	56303131	1160 N Fowler Ave	Low Density Residential	High Density Residential	HSSP
595	49817202	939 & 947 Sunnyside Ave	Low Density Residential	Very High Density Residential	N/A
596	49817201	965 & 975 Sunnyside Ave	Low Density Residential	Very High Density Residential	N/A
597	49817203	925 Sunnyside	Low Density Residential	Very High Density Residential	N/A
598	49938442	2560 Fowler Ave	Low Density Residential	High Density Residential	N/A
599	49938441	2612 Fowler Ave	Low Density Residential	High Density Residential	N/A

ORDINANCE 26-___

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF CLOVIS AMENDING AND CHANGING THE OFFICIAL ZONE MAP OF THE CITY OF CLOVIS IN ACCORDANCE WITH SECTION 9.08.020 OF THE CLOVIS MUNICIPAL CODE TO REZONE APPROXIMATELY 54 ACRES FROM VARIOUS ZONE DISTRICTS TO THE R-3 (MULTI-FAMILY HIGH DENSITY) AND R-4 (MULTI-FAMILY VERY HIGH DENSITY) ZONE DISTRICTS FOR 20 SITES LOCATED THROUGHOUT THE CITY OF CLOVIS

WHEREAS, the City of Clovis (City), 1033 Fifth Street, Clovis, CA 93619, initiated an application for Rezone (R) 2024-002 to amend the City's zoning map; and

WHEREAS, the initiation of the project was required in conjunction with the terms of the judgment entered in the *Martinez v. City of Clovis* case, whereby the City is required to rezone properties as part of the Infill Rezone Program in order to bring the City's Housing Element into compliance with applicable state law, which includes approximately 54 acres (20 sites) throughout the City; and

WHEREAS, the City proposes to amend the zoning map for approximately 54 acres (20 sites) throughout the City of Clovis and rezone the 20 sites from various zone districts to the R-3 (Multi-family High Density) and R-4 (Multi-family Very High Density) zone districts, as shown in **Attachment A** (Project) attached hereto and incorporated by reference; and

WHEREAS, the City worked with Rincon Consultants, Inc. and prepared an Environmental Assessment (EA) for the Project pursuant to Government Code section 65759, which provides that the California Environmental Quality Act does not apply to discretionary actions necessary to bring the Housing Element into compliance with State law pursuant to a court order or judgment; and

WHEREAS, the EA for the Project, dated April 2026, contains a mitigation monitoring and reporting program and collectively makes up the EA for the Project; and

WHEREAS, the City published notice of the public hearing for R2024-002 in *The Business Journal* on June 12, 2026, more than 20 days prior to the Planning Commission hearing in accordance with Government Code section 65484, subdivision (b)(2), and otherwise posted and provided written notice of the public hearing in accordance with applicable law; and

WHEREAS, the duly noticed public hearing was held by the City Council on July 6, 2026; and

WHEREAS, R2024-002 is in keeping with the intent and purpose of the City's Zoning Ordinance; and

WHEREAS, the City Council has had an opportunity to review and consider the entire Administrative Record relating to the Project, which is on file with the City's Department of Planning and Development Services, and reviewed and considered those portions of the Administrative Record determined to be necessary to make an informed decision, including, but not necessarily limited to, the staff report, the recommendation(s) of the Clovis Planning

Commission the written materials submitted with the request, and the verbal and written comments, testimony, and other evidence presented during the public hearing, which are incorporated herein by this reference (Administrative Record).

NOW, THEREFORE, BASED UPON THE ENTIRE RECORD OF THE PROCEEDINGS, THE CITY COUNCIL RESOLVES AND FINDS AS FOLLOWS:

1. As fully detailed in the analysis in the staff report for this item and Administrative Record, the Project satisfies the following required findings for approval of a rezone:

    a. The proposed amendment is consistent with the goals, policies, and actions of the General Plan;

    b. The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City; and

    c. The parcel is physically suitable (including absence of physical constraints, access, compatibility with adjoining land uses, and provision of utilities) for the requested zoning designations and anticipated land uses/ projects.

2. The City Council hereby approves R2024-002.

The City Council of the City of Clovis does ordain as follows:

Section 1 The official map of the city is amended in accordance with Section 9.08.020 and Chapter 9.86 of the Clovis Municipal Code by rezoning certain land in the City of Clovis, County of Fresno, State of California, to wit:

LEGAL DESCRIPTION:

See the attached **Attachment A**.

Section 2 This Ordinance shall go into effect and be in full force from and after thirty (30) days after its final passage and adoption.

APPROVED: August 10, 2026

_____ _____

Mayor City Clerk

* * * * * * * * * *

The foregoing Ordinance was introduced and read at a regular meeting of the City Council held on August 10, 2026, and was adopted at a regular meeting of said on _____, by the following vote, to wit:

AYES:
NOES:

ABSENT:
ABSTAIN:

DATED:

_____
City Clerk

ATTACHMENT A

LEGAL DESCRIPTION

Site #3



Description of Zoning Changes for Site:

Site #3 will adjust the zone district from the P-C-C (Planned Commercial Center) zone district to the R-3 (Multifamily High Density) zone district.

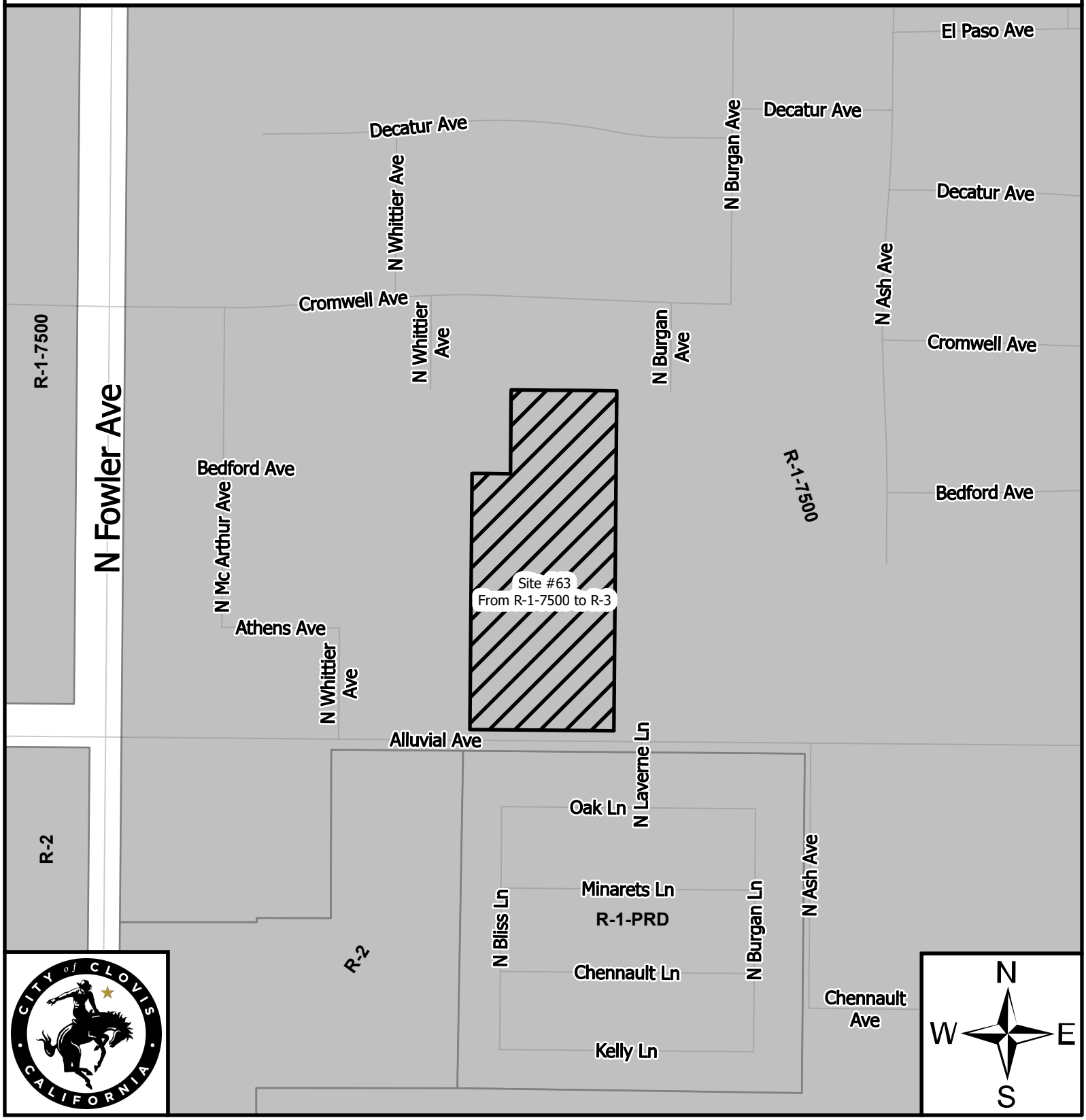
0 175 350 700 1,050

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #63



Description of Zoning Changes for Site:

Site #63 will adjust the zone district from the R-1-7500 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

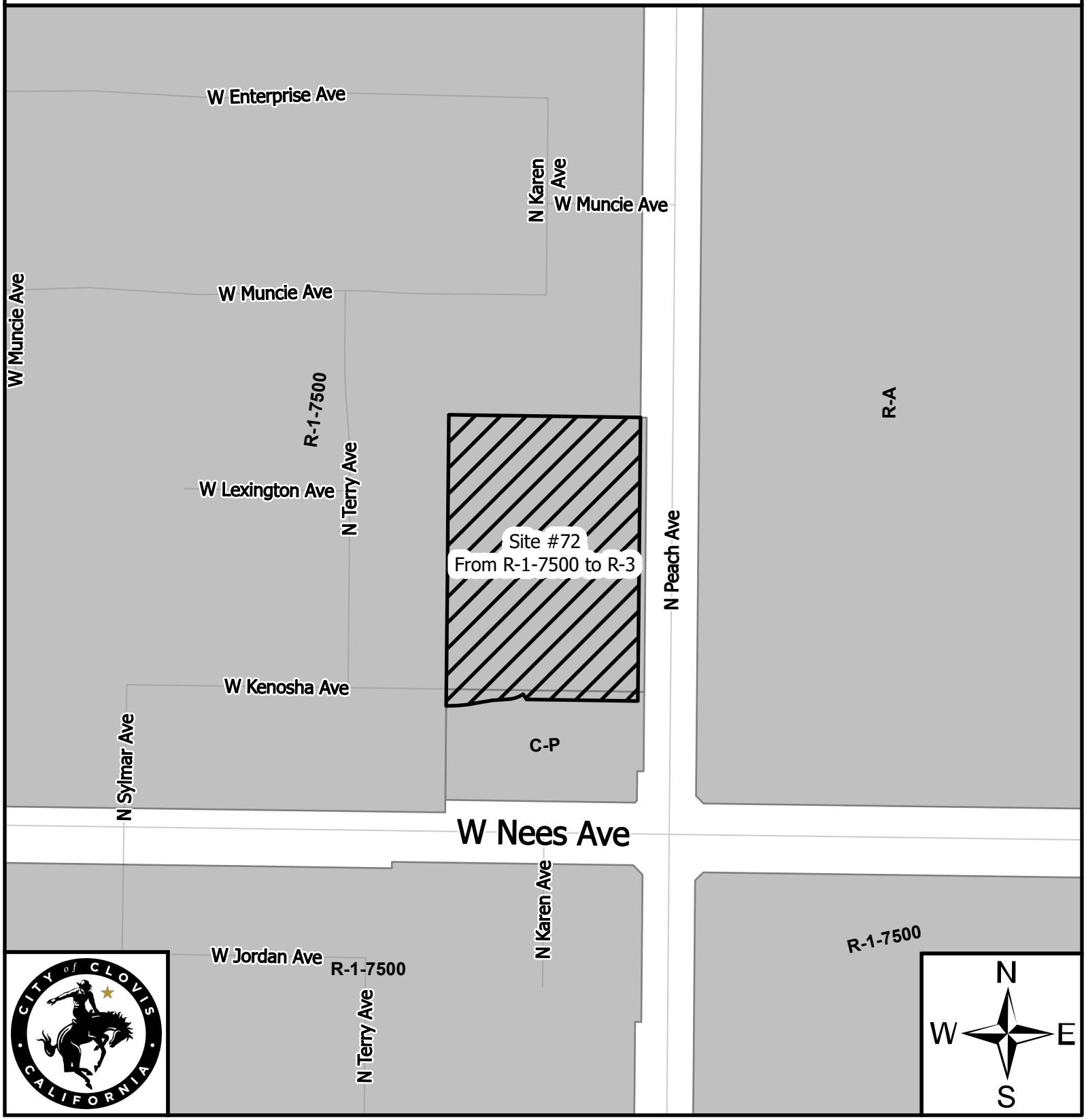
0 175 350 700 1,050

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #72



Description of Zoning Changes for Site:

Site #72 will adjust the zone district from the R-1-7500 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

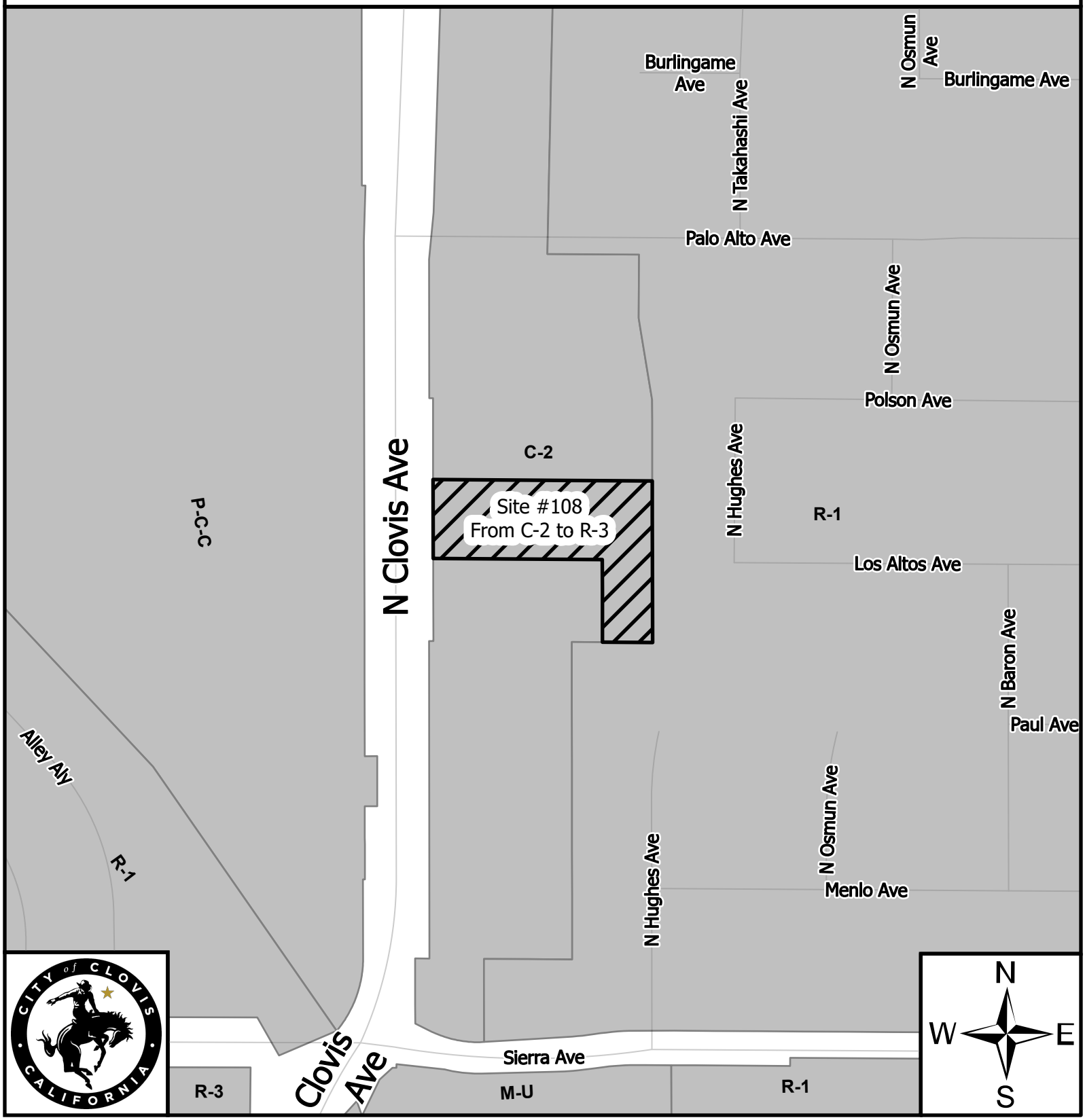
0 155 310 620 930

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #108



Description of Zoning Changes for Site:

Site #108 will adjust the zone district from the C-2 (Community Commercial) zone district to the R-3 (Multifamily High Density) zone district.

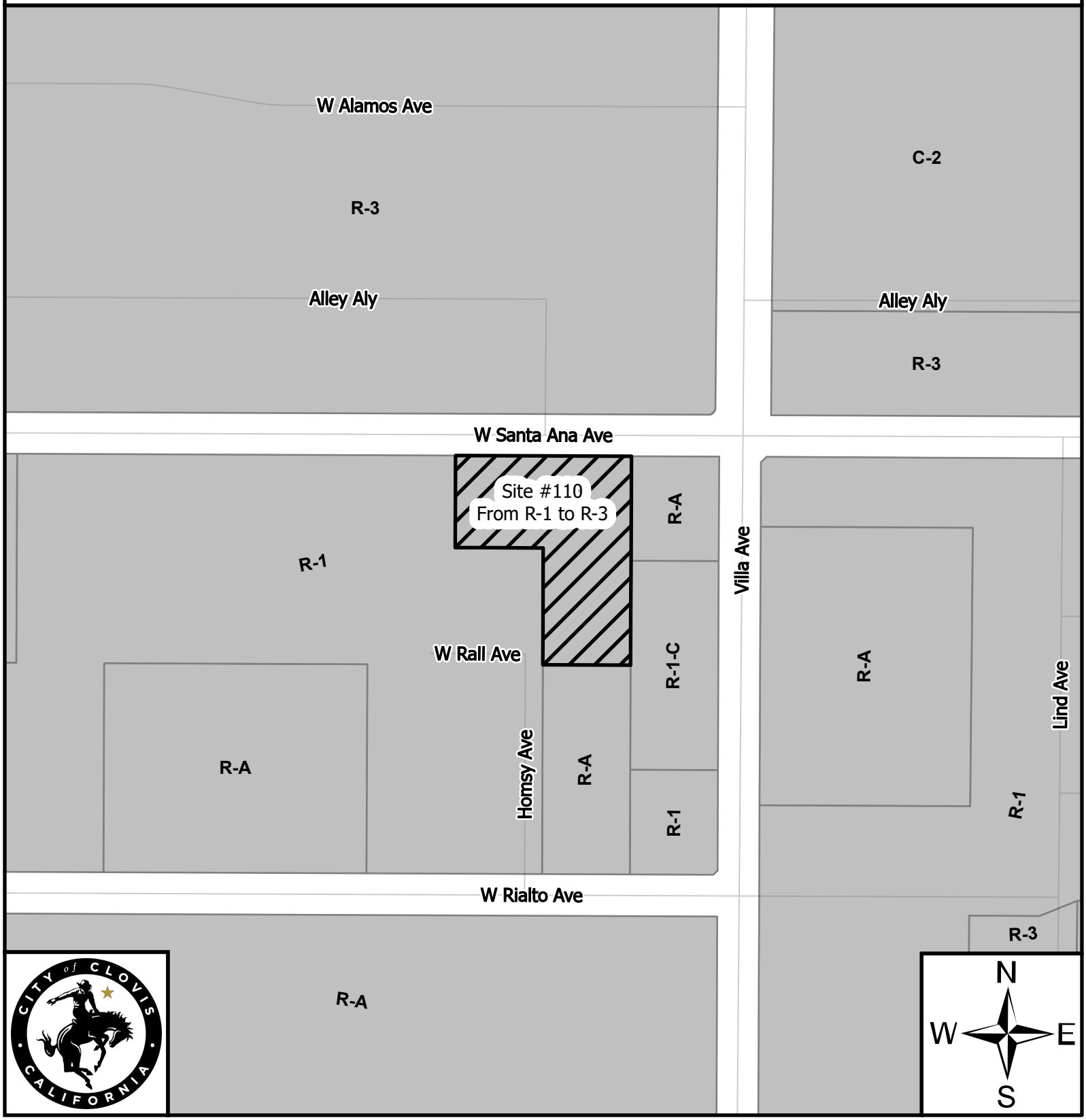
0 155 310 620 930

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #110



Description of Zoning Changes for Site:

Site #110 will adjust the zone district from the R-1 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

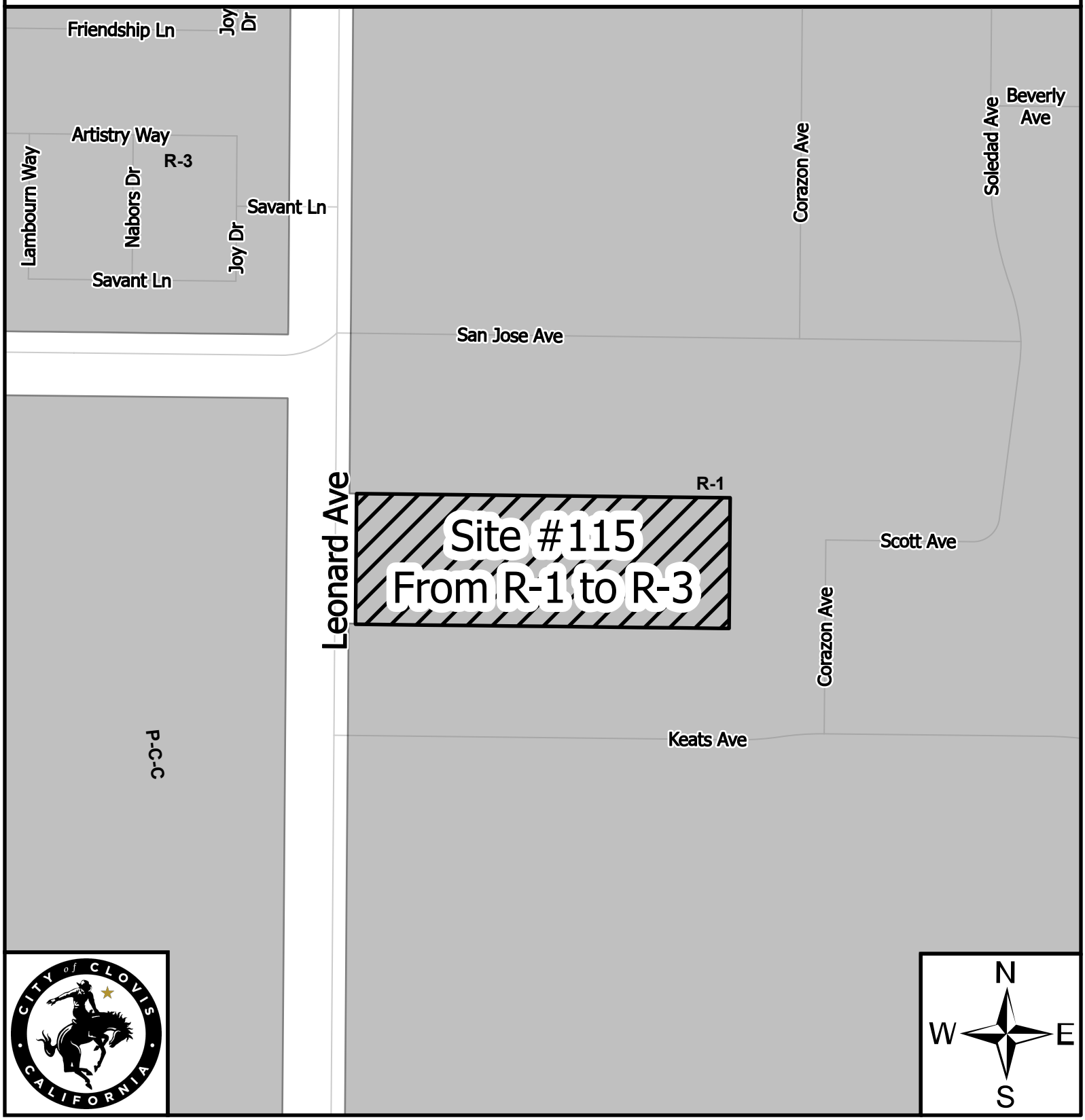
0 137.5 275 550 825

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #115



Description of Zoning Changes for Site:

Site #115 will adjust the zone district from the R-1 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

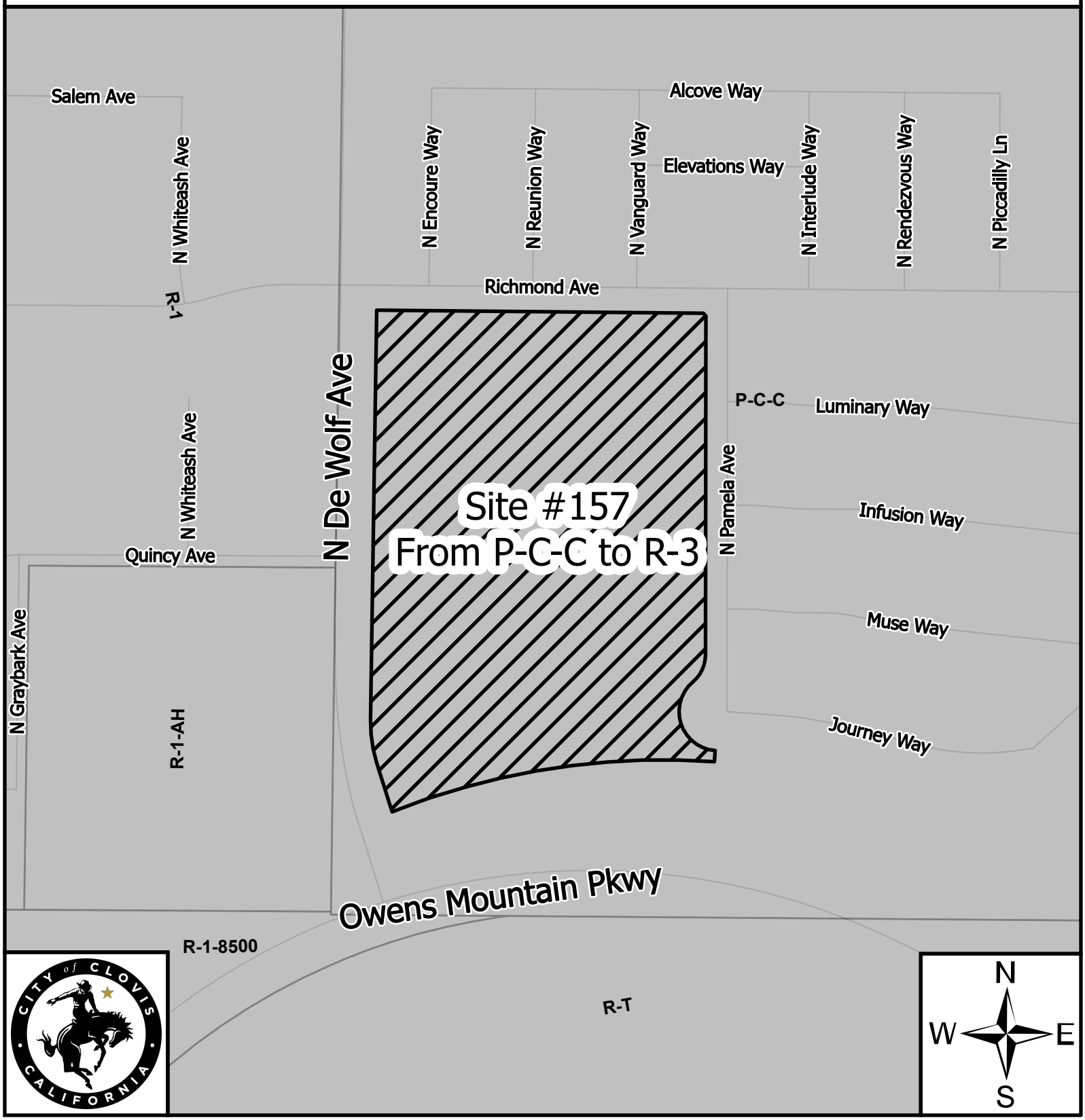
0 137.5 275 550 825

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #157



Description of Zoning Changes for Site:

Site #157 will adjust the zone district from the P-C-C (Planned Commercial Center) zone district to the R-3 (Multifamily High Density) zone district.

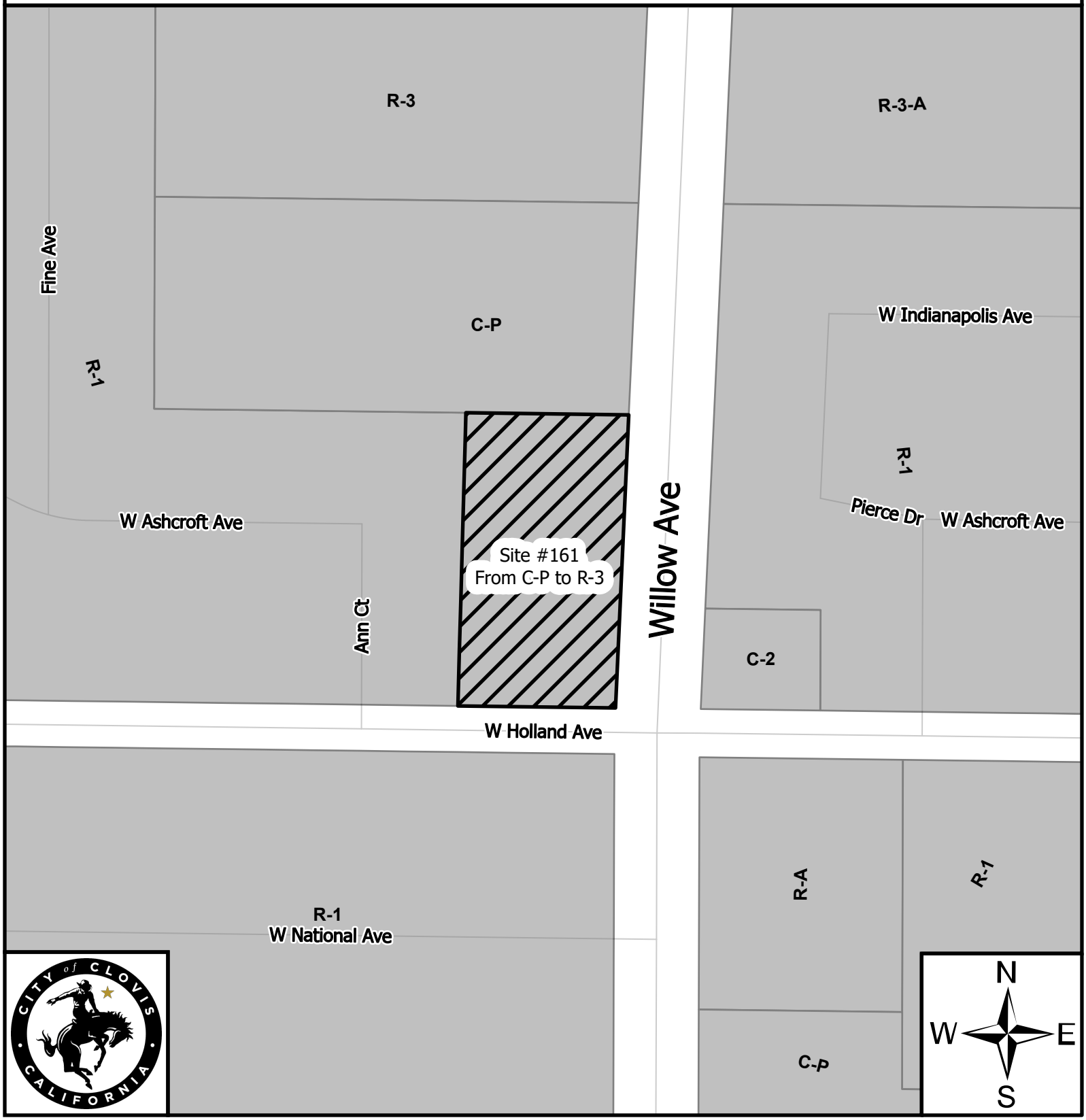
0 137.5 275 550 825

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #161



Description of Zoning Changes for Site:

Site #161 will adjust the zone district from the C-P (Administrative and Professional Office) zone district to the R-3 (Multifamily High Density) zone district.

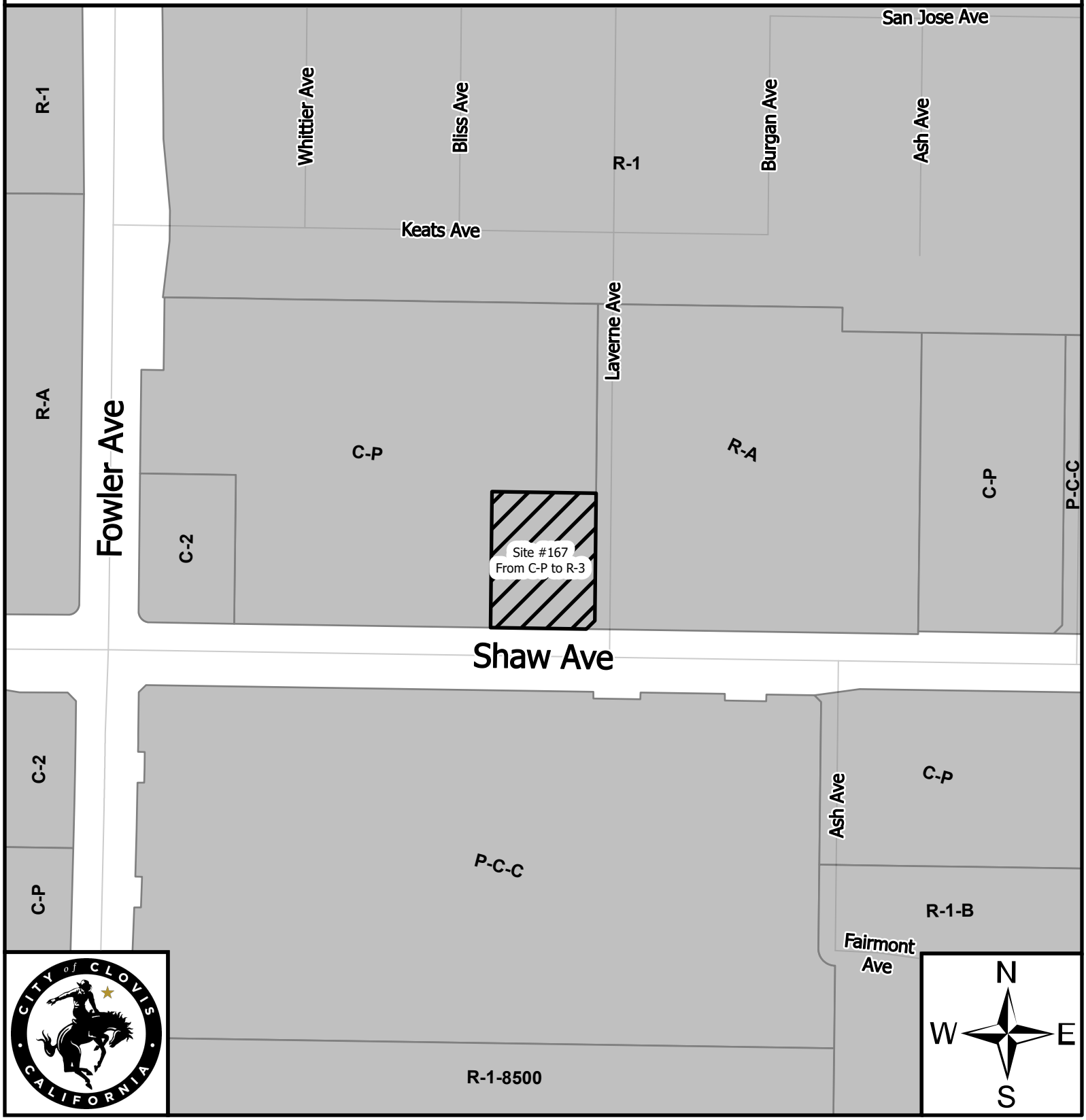
0 120 240 480 720

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #167



Description of Zoning Changes for Site:

Site #167 will adjust the zone district from the C-P (Administrative and Professional Office) zone district to the R-3 (Multifamily High Density) zone district.

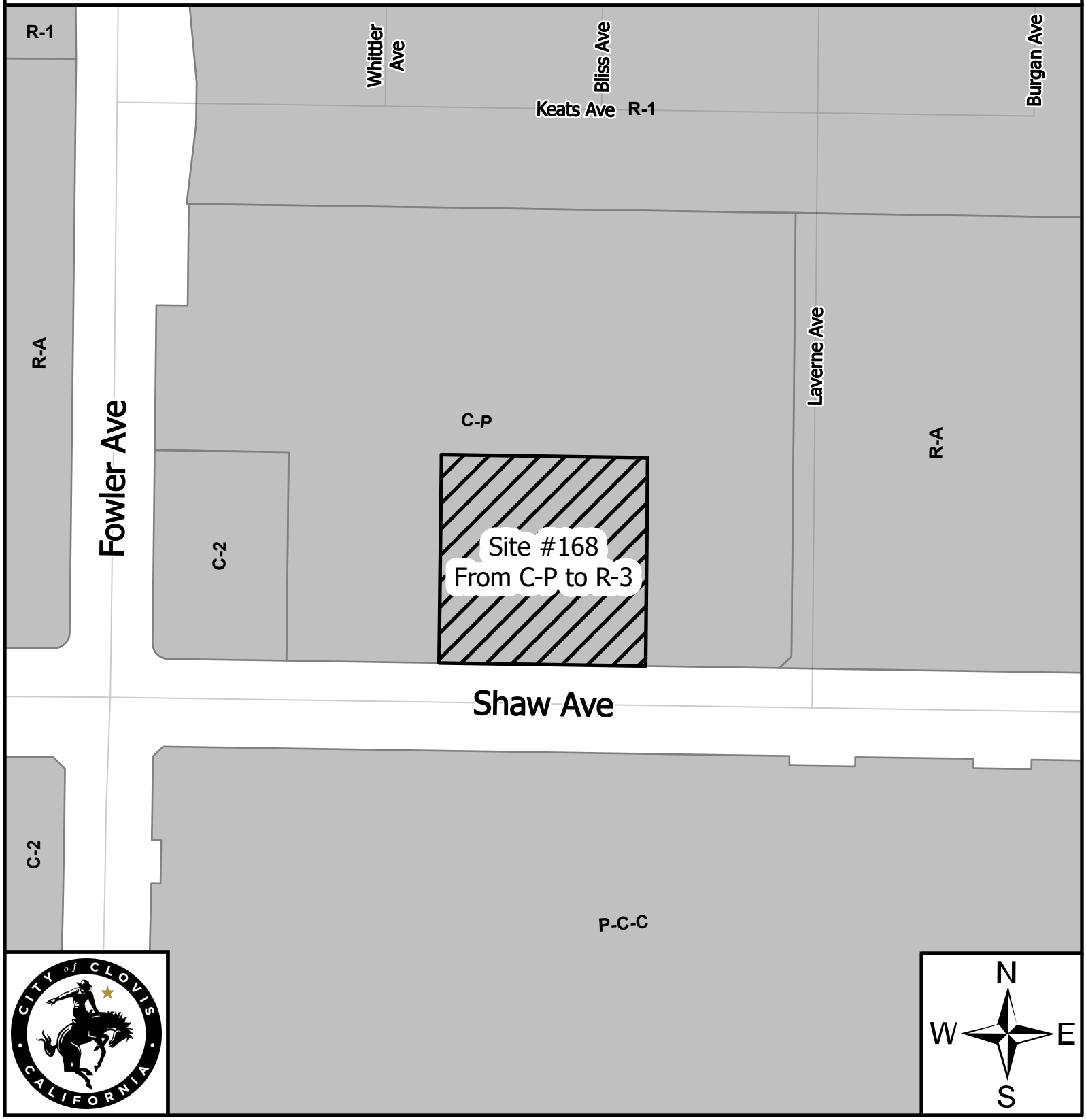
0 170 340 680 1,020

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #168



Description of Zoning Changes for Site:

Site #168 will adjust the zone district from the C-P (Administrative and Professional Office) zone district to the R-3 (Multifamily High Density) zone district.

0 120 240 480 720

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #197



Description of Zoning Changes for Site:

Site #197 will adjust the zone district from the R-1-AH (Single Family Residential Very Low Density) zone district to the R-3 (Multifamily High Density) zone district.

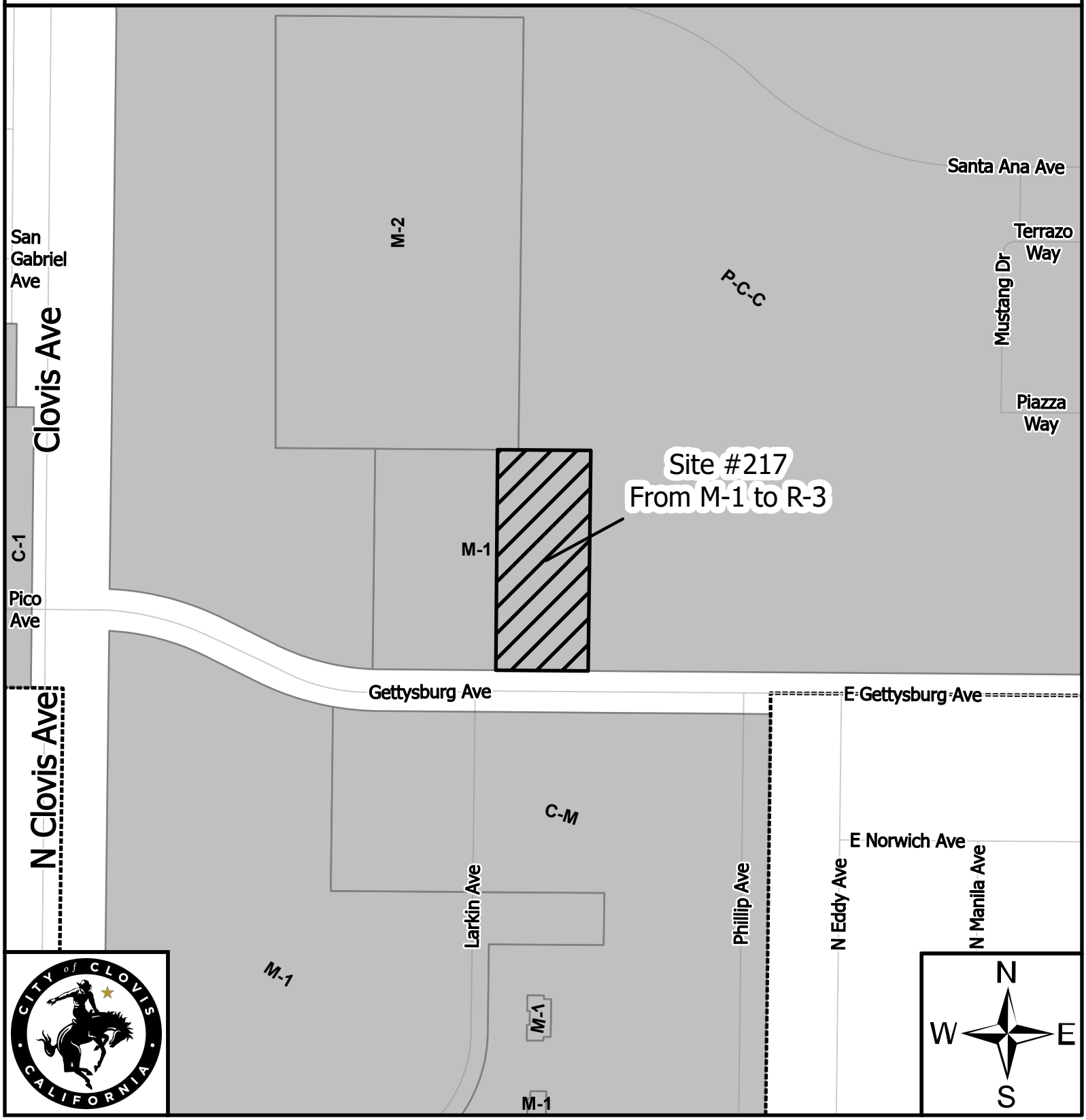
0 120 240 480 720

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #217



Description of Zoning Changes for Site:

Site #217 will adjust a portion of the zone district for the parcel from the M-1 (Light Industrial) zone district to the R-3 (Multifamily High Density) zone district.

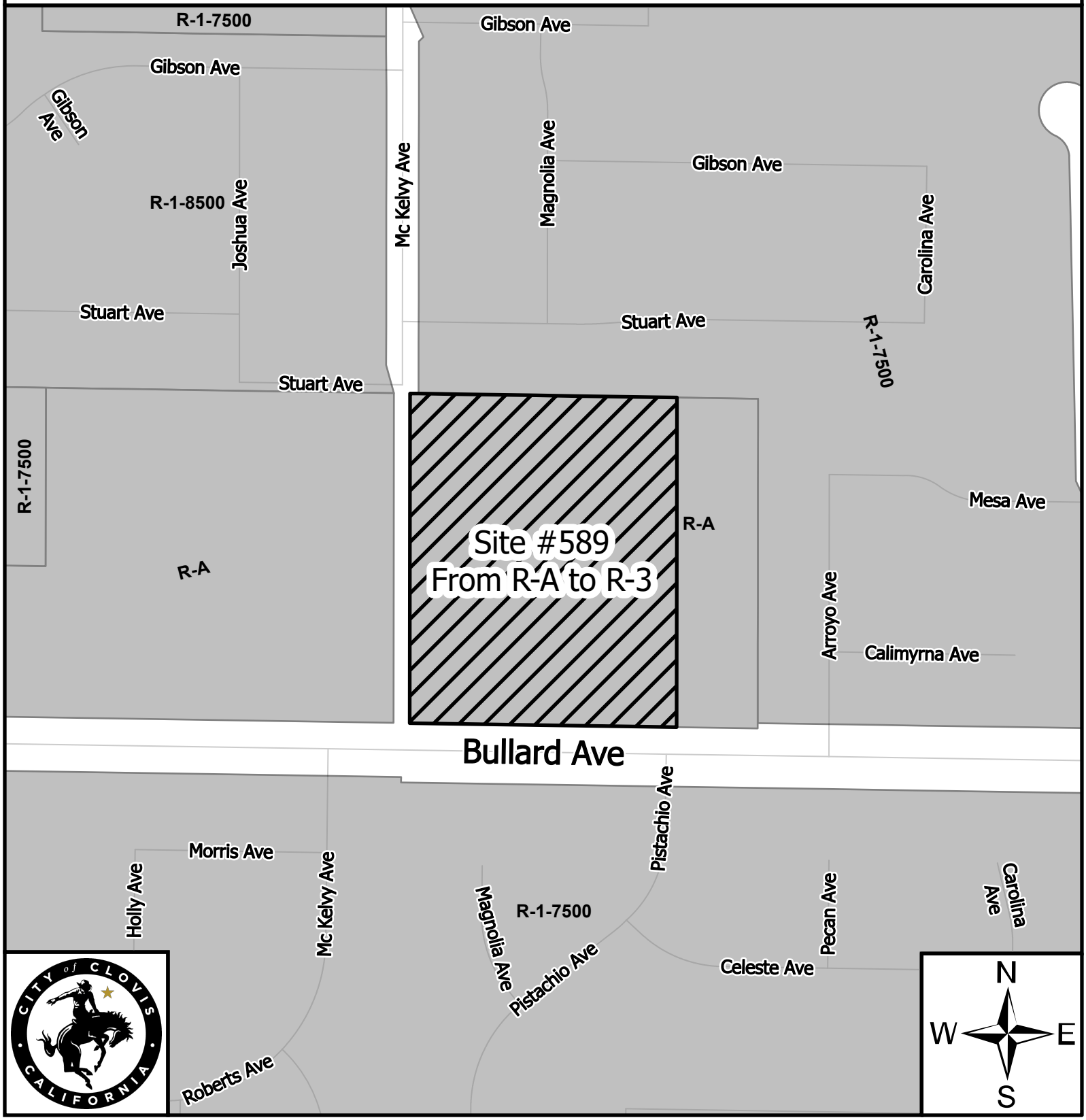
0 180 360 720 1,080

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #589



Description of Zoning Changes for Site:

Site #589 will adjust the zone district from the R-A (Single Family Residential Very Low Density) zone district to the R-3 (Multifamily High Density) zone district.

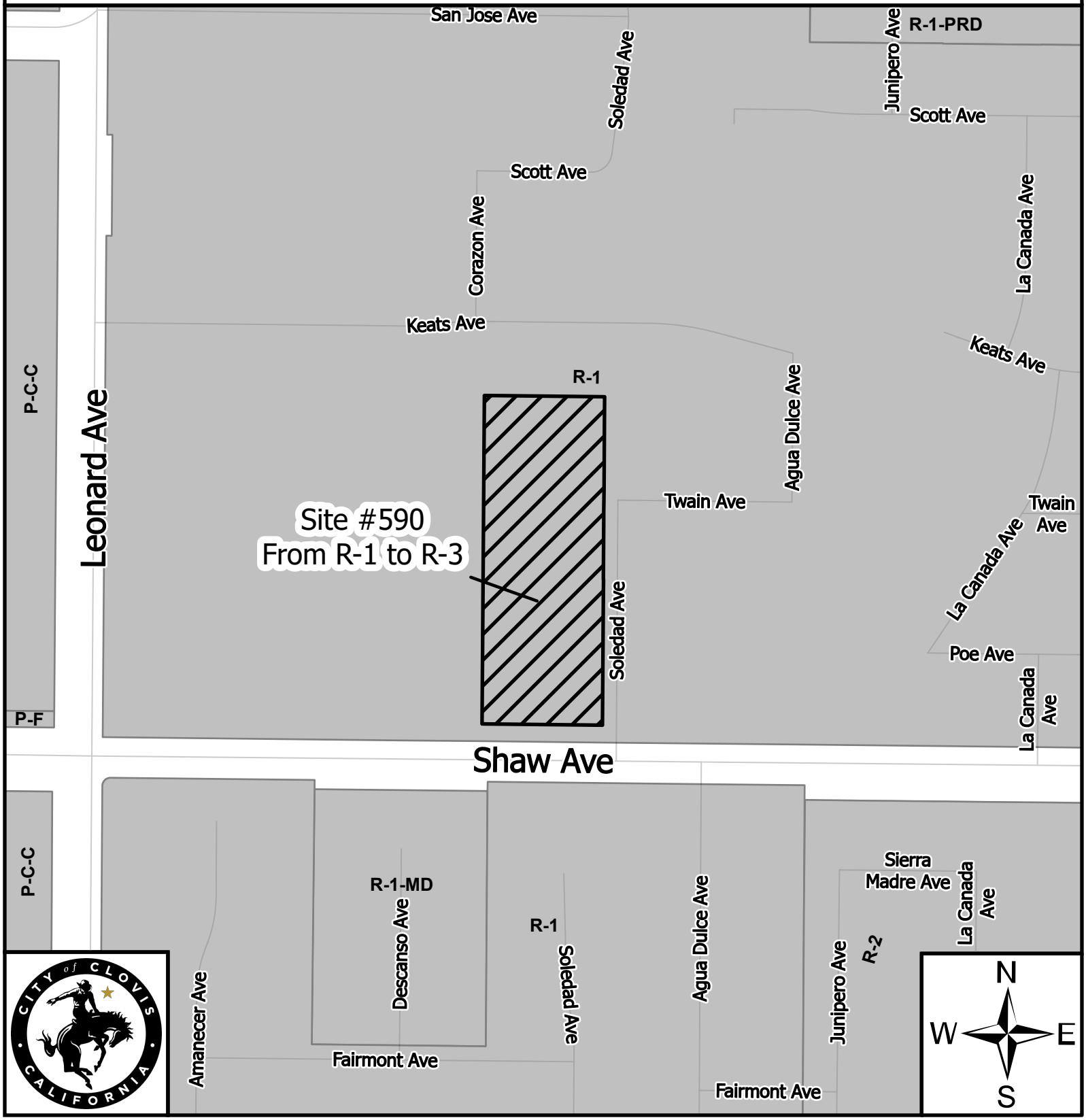
0 175 350 700 1,050

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #590



Description of Zoning Changes for Site:

Site #590 will adjust the zone district from the R-1 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

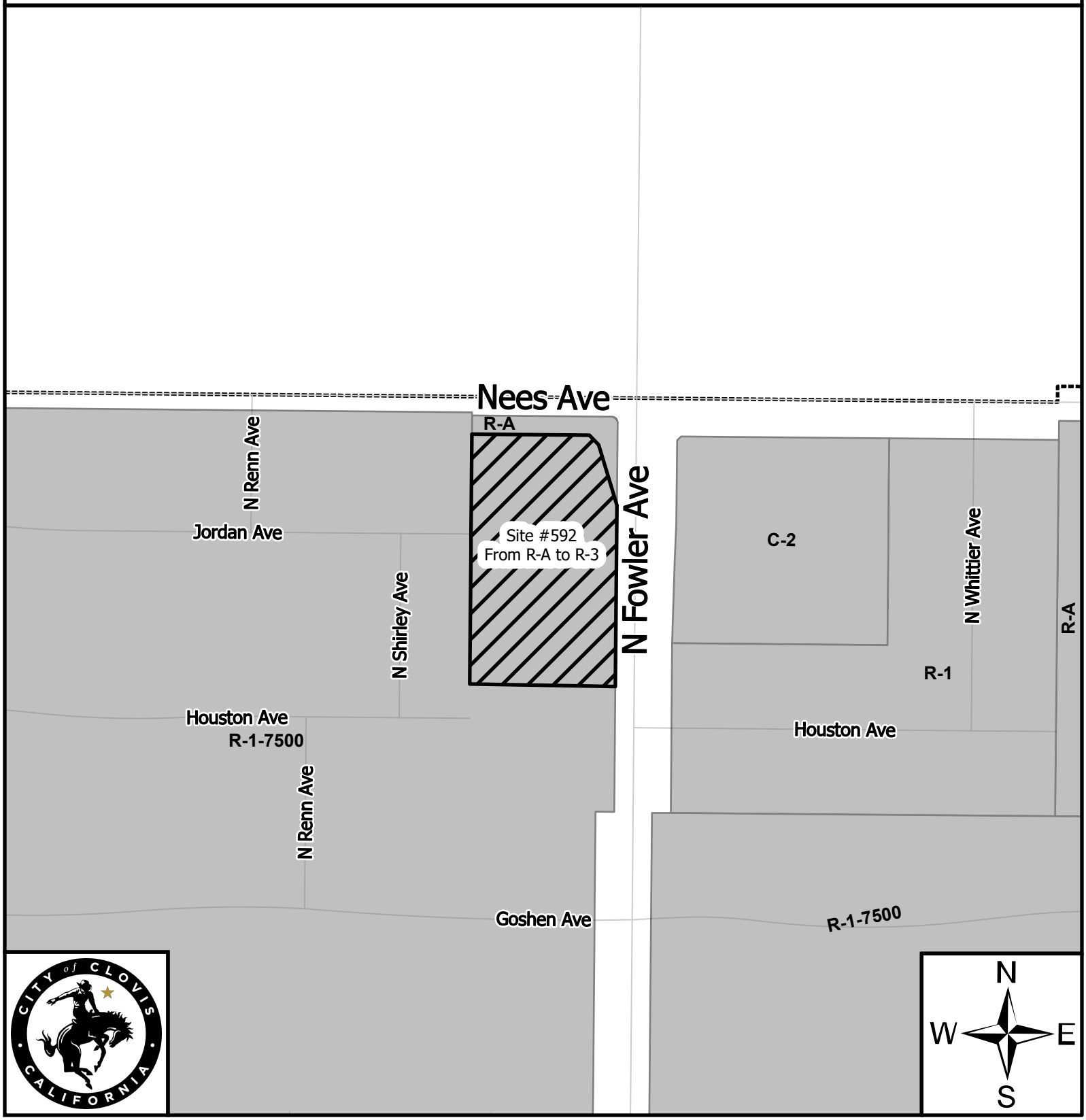
0 175 350 700 1,050

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Site #592



Description of Zoning Changes for Site:

Site #592 will adjust the zone district from the R-A (Single Family Residential Very Low Density) zone district to the R-3 (Multifamily High Density) zone district.

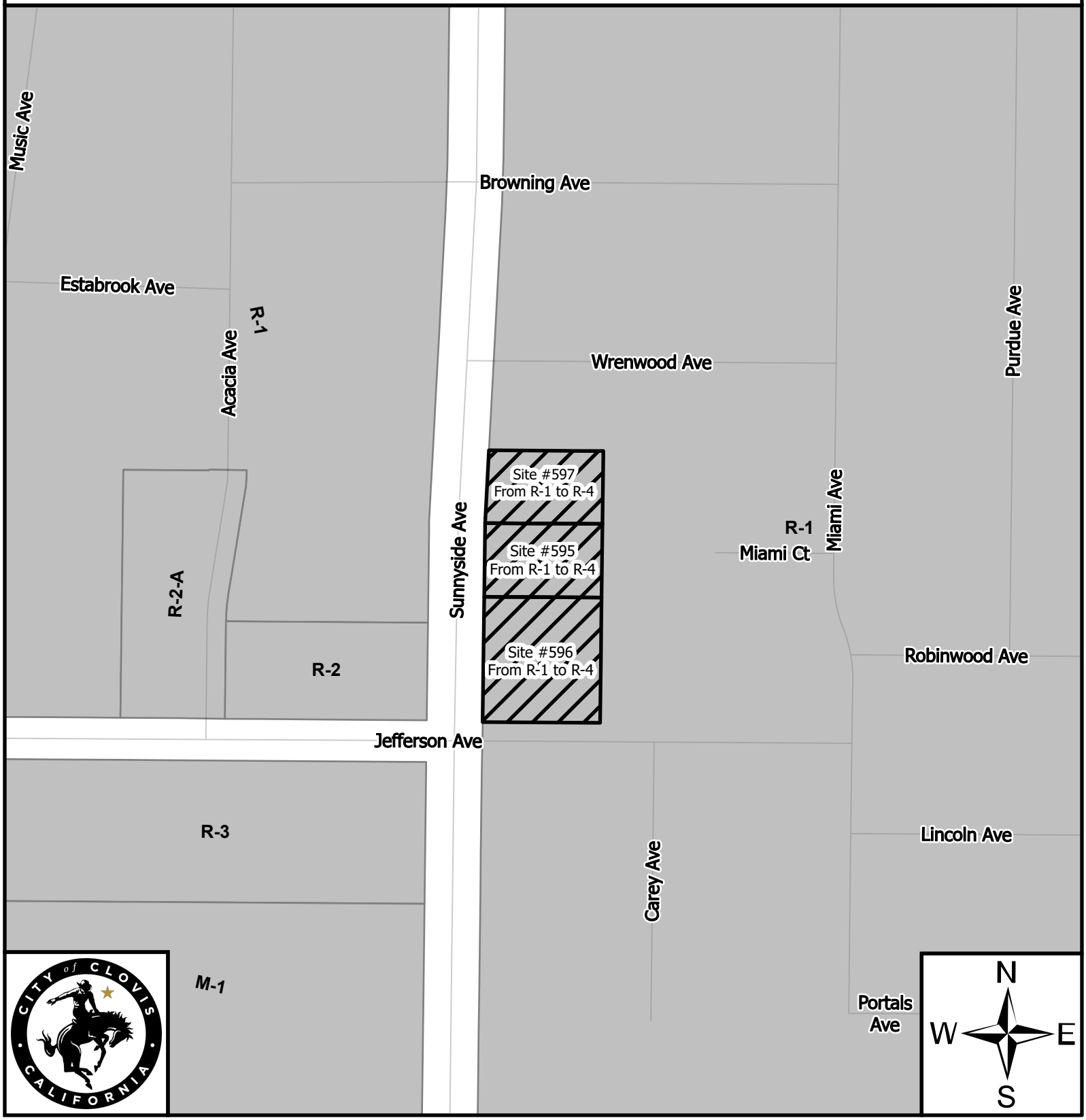
0 155 310 620 930

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Sites #595, 596, 597



Description of Zoning Changes for Site:

Sites #595, 596, 597 will adjust the zone district from the R-1 (Single Family Residential) zone district to the R-4 (Multifamily Very High Density) zone district.

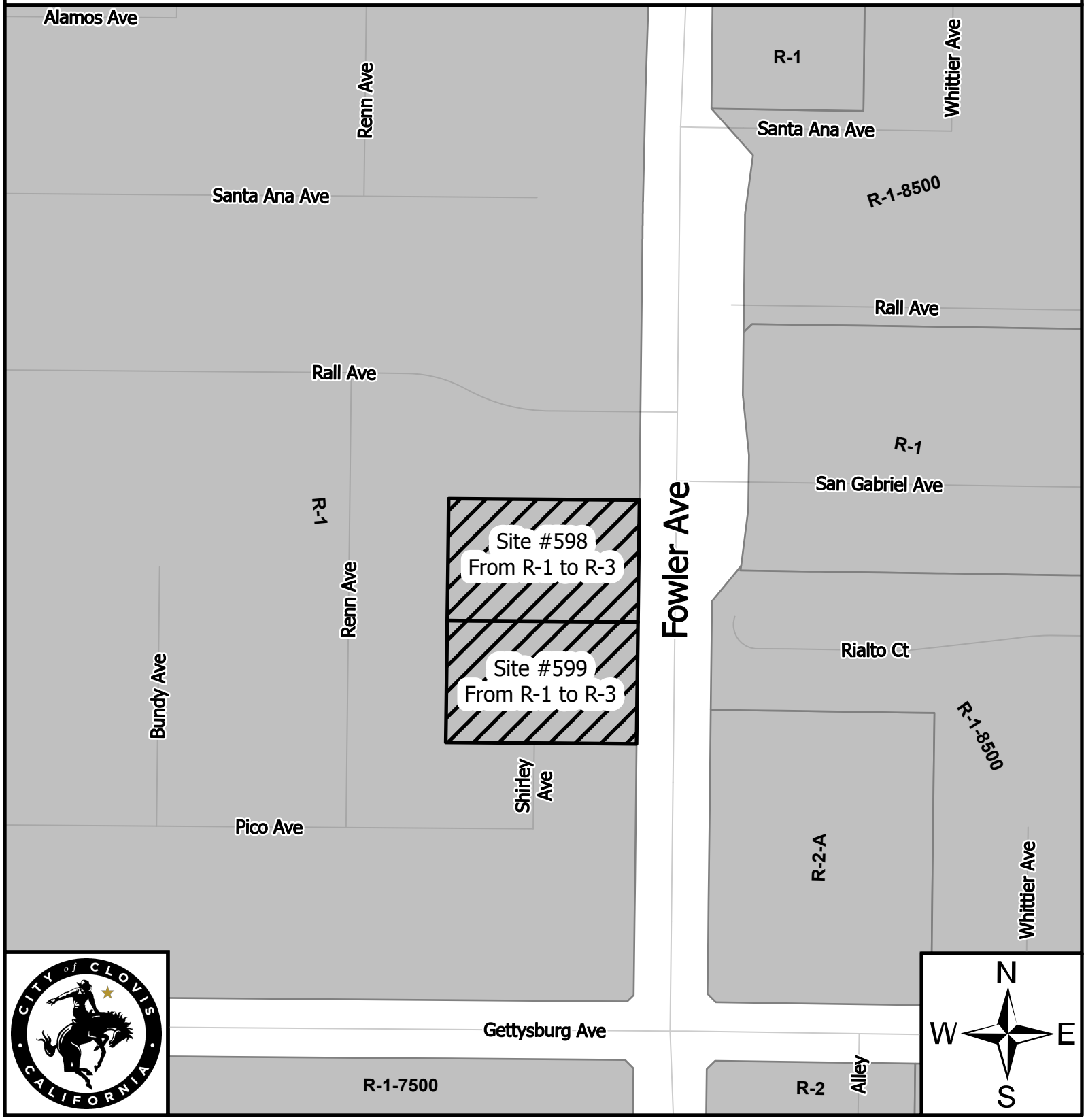
0 137.5 275 550 825

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

Sites #598, 599



Description of Zoning Changes for Site:

Sites #598, 599 will adjust the zone district from the R-1 (Single Family Residential) zone district to the R-3 (Multifamily High Density) zone district.

0 137.5 275 550 825

US Feet

Legend

- Rezone Site
- Clovis Streets
- City Boundary
- City of Clovis Zoning

E-FILED
3/26/2024 9:25 AM
Superior Court of California
County of Fresno
By: Alexandria Payne, Deputy

Scott G. Cross, SBN 199116
David J. Wolfe, SBN 137659
Matthew M. Lear, SBN 316582
LOZANO SMITH
7404 N. Spalding Avenue
Fresno, CA 93720-3370
Telephone: (559) 431-5600
Facsimile: (559) 261-9366

Attorneys for CITY OF CLOVIS, CLOVIS CITY COUNCIL and LUKE SERPA

Exempt from Filing Fee
Per Gov. Code § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF FRESNO

DESIREE MARTINEZ, an individual,

Petitioner/Plaintiff,

v.

CITY OF CLOVIS, CLOVIS CITY COUNCIL, LUKE SERPA, in his official capacity as City Manager of Clovis, and DOES 1-20,

Respondents/Defendants.

Case No. 19CECG03855

ASSIGNED FOR ALL PURPOSES TO:
Hon. Kristi Culver Kapetan

NOTICE OF ENTRY OF JUDGMENT PURSUANT TO STIPULATION

Complaint Filed: October 23, 2019
FAC Filed: December 16, 2019

NOTICE IS HEREBY GIVEN that on March 19, 2024, the Court entered and filed Judgment Pursuant to Stipulation in this case. A true and correct copy of said Judgment is attached hereto as Exhibit "A."

Dated: March 26, 2024

LOZANO SMITH

Scott G. Cross
David J. Wolfe
Matthew M. Lear
Attorneys for Respondents/Defendants
CITY OF CLOVIS, CLOVIS CITY COUNCIL and LUKE SERPA

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

PROOF OF SERVICE

I, **Stephen P. Scudder**, am employed in the County of Fresno, State of California. I am over the age of eighteen years and not a party to the within entitled cause; my business address is 7404 N. Spalding Avenue, Fresno, California 93720. My business e-mail address is: sscudder@lozanosmith.com.

On March 26, 2024, I served the attached **NOTICE OF ENTRY OF JUDGMENT PURSUANT TO STIPULATION** on the interested parties in said cause, by placing a true copy thereof enclosed in a sealed envelope addressed as follows and I caused delivery to be made by the mode of service indicated below:

Valerie Feldman
Public Interest Law Project
449 15th Street, Ste. 301
Oakland, CA 94612-2821
vfeldman@pilpca.org

Patience Milrod
985 N. Van Ness Avenue
Fresno, CA 93728
pm@patiencemilrod.com

Royce D. Stuteville
Stephanie H. Borchers
Central California Legal Services, Inc.
2115 Kern Street, Suite 200
Fresno, California 93721
rstuteville@centralcallegal.org
sborchers@centralcallegal.org

[ ] (***Regular U.S. Mail***) on all parties in said action in accordance with Code of Civil Procedure Section 1013, by placing a true and correct copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth above, at Lozano Smith, which mail placed in that designated area is given the correct amount of postage and is deposited at the Post Office that same day, in the ordinary course of business, in a United States mailbox in the County of Fresno.

[ ] (***By Federal Express/Overnight Mail***) on all parties in said action by depositing a true and correct copy thereof in a sealed envelope/packet for overnight mail delivery, with charges thereon fully paid, in a Federal Express collection box, at Fresno, California, and addressed as set forth above.

[ ] (***By Facsimile***) on all parties in said action by transmitting a true and correct copy thereof from our office facsimile machine to the facsimile machine numbers shown in this proof of service and/or the attached list. Following transmission, a Transmission Report was received from our fax machine indicating that the transmission had been transmitted without error.

[X] (***By Electronic Mail***) on all parties in said action by transmitting a true and correct to the persons at the email addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on March 26, 2024, at Fresno, California.

Stephen P. Scudder

4857-6784-8880 v.1.docx

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

EXHIBIT A

FILED
MAR 19 2024
SUPERIOR COURT OF CALIFORNIA
COUNTY OF FRESNO
BY _____ DEPUTY

Scott G. Cross, SBN 199116
David J. Wolfe, SBN 137659
Matthew M. Lear, SBN 316582
LOZANO SMITH
7404 N. Spalding Avenue
Fresno, CA 93720-3370
Telephone: (559) 431-5600
Facsimile: (559) 261-9366

RECEIVED
3/18/2024 9:55 AM
FRESNO COUNTY SUPERIOR COURT
By: Estela Gonzalez, Deputy

Attorneys for CITY OF CLOVIS, CLOVIS CITY COUNCIL and LUKE SERPA

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF FRESNO

DESIREE MARTINEZ, an individual,

Petitioners/Plaintiffs,

v.

CITY OF CLOVIS, CLOVIS CITY COUNCIL, LUKE SERPA, in his official capacity as City Manager of Clovis, and DOES 1-20,

Respondents/Defendants.

Case No. 19CECG03855

ASSIGNED FOR ALL PURPOSES TO:
Hon. Kristi Culver Kapetan

~~[PROPOSED]~~ JUDGMENT PURSUANT TO STIPULATION

Complaint Filed: October 23, 2019
FAC Filed: December 16, 2019

JUDGMENT

Pursuant to the foregoing Stipulation for Judgment between the Petitioner/Plaintiff Desiree Martinez and Respondents/Defendants City of Clovis, Clovis City Council, and Luke Serpa, and pursuant to the Court's authority under Code of Civil Procedure section 664.6:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that judgment be, and hereby is, entered in accordance with the terms of the Settlement Agreement which is attached as **Exhibit A** to the foregoing Stipulation for Judgment. This judgment expressly incorporates the terms of the parties' Settlement Agreement, including but not limited to the provisions of Government Code section 65759, which provides in part that the California Environmental Quality Act ("CEQA") "does not apply to any action necessary to bring [the City's] general plan or relevant mandatory elements of the plan into

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

compliance with any court order or judgment under this article." Pursuant to Section 65759, CEQA does not apply to any discretionary actions necessary to bring the Housing Element and any relevant mandatory elements of the General Plan into compliance with State law.

The Court retains jurisdiction over the parties at their request to enforce the Settlement Agreement until the terms are fulfilled or excused.

DATED: 3/19/24

Judge of the Superior Court

LOZANO SMITH
7404 N. Spalding Avenue Fresno, CA 93720-3370
Tel 559-431-5600 Fax 559-261-9366

EXHIBIT A

SETTLEMENT AGREEMENT AND GENERAL RELEASE

This Settlement Agreement and General Release ("Agreement") is entered effective on February 20, 2024 ("Effective Date"), by and between the City of Clovis, a California municipal corporation ("City") and Desiree Martinez ("Martinez") with respect to the following Recitals, which are a substantive part of this Agreement. City and Martinez are hereinafter sometimes referred to individually as the "Party" and together as the "Parties."

RECITALS

A. On October 23, 2019, Martinez, as Petitioner/Plaintiff, commenced an action against the City, Clovis City Council, and Luke Serpa, in his official capacity as the Clovis City Manager in the Superior Court of California, County of Fresno, as Case No. 19CECG03855 ("Action"). For purposes of this Agreement "City" includes the City of Clovis, Clovis City Council, and Luke Serpa, in his official capacity as the Clovis City Manager, as Respondents/Defendants listed in the Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief Respondent filed in the Action.

B. Martinez filed a First Amended Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief on December 16, 2019, in the Action against Respondents/Defendants.

C. On April 30, 2021, the Fresno County Superior Court issued an Order Granting Petition for Writ of Mandate in Part in the Action, and on June 1, 2021, the Court issued a Judgment for Writ of Mandate directing City within 120 days to adopt a Housing Element in substantial compliance with Government Code section 65754, and to implement Program 4 by rezoning an adequate number of sites to accommodate the City's unmet share of the Regional Housing Needs Assessment ("RHNA") for the 2008-2015 Housing Element planning period.

D. City and Martinez timely appealed the Court's Judgment.

E. On April 7, 2023, the Fifth District Court of Appeal issued its Opinion in Case No. F082914, on the appeal of City and cross-appeal of Martinez from the Judgment for Writ of Mandate entered by the Court on June 1, 2021. The Court of Appeal awarded costs to the Petitioner.

F. On May 17, 2023, the City filed a Petition for Review of the Court of Appeal Opinion with the California Supreme Court, which was denied by the Supreme Court on July 19, 2023. On June 6, 2023, the City filed a letter in the Supreme Court requesting depublication of the Court of Appeal's opinion.

G. On July 19, 2023, the California Supreme Court denied the City's petition for review, and denied the request for depublication.

H. On July 20, 2023, the Court of Appeal issued the Remittitur to the Superior Court.

I. On August 22, 2023, following remand by the Fifth District Court of Appeal, the Superior Court issued an Order overruling the City's Demurrer to Martinez's fourth and fifth causes of action in First Amended Petition.

J. On August 24, 2023, Petitioner filed and served a Memorandum of Costs on Appeal totaling $714.95 in the Fresno County Superior Court.

K. City filed and served an Answer to the First Amended Petition on November 1, 2023. Martinez's fourth, fifth, sixth, and eighth causes of action are at issue and remain to be tried. The Petitioner prevailed in part on the seventh cause of action, which was remanded in part for an evidentiary hearing on additional issues. Those causes of action pertain to Unlawful Land Use Discrimination, Violation of the Federal Fair Housing Act, the California Fair Employment and Housing Act, City's Duty to Affirmatively Further Fair Housing, and for Declaratory and Injunctive Relief.

L. The Court has held two Status Conferences, on October 19, 2023, and December 5, 2023, at which time the Parties informed the Court of ongoing settlement discussions over the various issues in this Action.

M. In accordance with Government Code section 65754, and as set forth in this Court's Order of April 30, 2021, the City has a mandatory obligation to bring its Housing Element into compliance within 120 days of the date of remittitur. Compliance necessarily includes implementing any programs in the Housing Element necessary for statutory compliance. These obligations are statutorily exempt from the California Environmental Quality Act ("CEQA"), as set forth in Government Code section 65759 and CEQA Guidelines (14 Cal. Code Regs.) section 15282, subdivision (s).

N. City and Martinez now desire to avoid the time and expense involved with further litigation in the Action and intend to compromise and settle all actual and potential issues and claims arising from or connected with the Action, the Judgment issued by the Court on June 1, 2021, and any rulings directed towards the Court contained in the April 7, 2023, Fifth District Court of Appeal Opinion and by way of the remittitur issued on July 20, 2023, and to set forth the terms and conditions of the settlement.

NOW, THEREFORE, in consideration of the mutual promises set forth herein, Martinez and City agree as follows:

1. Definitions. The terms below shall have the following meanings when used in this Agreement and any Exhibit attached hereto.

"Affordable" means that the cost of a housing unit (rent or sale price) does not exceed thirty percent (30%) of the state maximum household income adjusted for family size appropriate for the unit. The term "adjusted for family size appropriate for the unit" shall have the same meaning as provided in Health and Safety Code section 50052.5(c) as it may be amended, or in any successor statute.

"Affordable Housing" means a dwelling unit available at an Affordable rent or sold at an Affordable housing price. A dwelling unit designated for Affordable Housing shall remain affordable for the longest feasible duration (but not less than fifty-five years for rental units and forty-five years for for-sale units) from the date of recordation of a covenant or regulatory agreement or similar document recorded with the Fresno County Recorder's office. The recording must occur prior to the issuance of the Certificate of Occupancy. Affordable Housing Dwelling Units funded by a City Action Item program described in this Agreement within a multi-family housing project will be required to remain affordable for a minimum of fifty-five (55) years. Affordable Housing Dwelling Units funded by a City Action Item program within a single-family housing project will be required to remain affordable for a minimum of forty-five (45) years.

"Area Median Income" means area median income as periodically established by the Department of Housing and Community Development pursuant to Health & Safety Section 50093. (Gov. Code § 65589.5(h)(4).)

"Dwelling Unit" means one residential unit, either for sale or rent.

"Extremely Low-Income Household" means a household whose income does not exceed thirty percent (30%) of the Area Median Income, adjusted for household size, applicable to Fresno County, as set forth in Health and Safety Code section 50106, as it may be amended, or in any successor statute. Extremely Low-Income Household may also be referenced herein as an ELI Household.

"Gap Financing" means the amount of funding necessary to fill the gap between the funding required to develop and make available the Affordable Housing Dwelling Units and the resources commonly available to developers.

"Low-Income Household" means a household whose income does not exceed eighty percent (80%) of Area Median Income, adjusted for household size, applicable to Fresno County, as set forth in Health and Safety Code section 50079.5, as it may be amended, or in any successor statute. Low-Income Household may also be referenced herein as an LI Household.

"Very Low-Income Household" means a household whose income does not exceed fifty percent (50%) of the Area Median Income, adjusted for household size, applicable to Fresno County, as set forth in Health and Safety Code section 50105, as it may be amended, or in any successor statute. Very Low-Income Household may also be referenced herein as a VLI Household.

2. City Action Items. City shall take the following actions. Upon full execution of this Agreement by the Parties and their respective legal counsel, City shall immediately notify the California Department of Housing and Community Development ("HCD") of this Agreement and all City Action Item programs will be included in the City's 6th Cycle Housing Element (2023-2031).

a. **ACTION ITEM 1: CHANGES TO R-3 ZONE DISTRICT**: City shall amend its R-3 medium density zone district increasing the minimum permitted density from 15 units/acre to 20 units/acre.

i. The R-3 zone amendment ordinance shall be initiated by the City Council no later than the third regularly scheduled and held City Council meeting after Notice of Entry of the Stipulated Judgment (referenced in Section 9 below) is served on all parties.

ii. Completion of the R-3 zone amendment shall occur no later than July 31, 2024.

iii. The City will not initiate, nor approve, any action that would reduce the current capacity in the R-3 zone district.

iv. The R-3 zone allows for three story projects by right in accordance with Clovis Municipal Code section 9.10.030, Table 2-3 (R-3 Zone).

v. Reduced parking standards are available for affordable housing projects under the City's Density Bonus Ordinance in accordance with Clovis Municipal Code section 9.26.050.

vi. The following parking language, or something substantially similar as approved by HCD, will be included as a program (proposed program H8) in the City's 6th Cycle Housing Element:

"Review and update the Development Code to remove identified constraints on housing development, including reducing parking standards for multifamily housing to require no more than one parking space for studio and one-bedroom units and reducing open space requirements in the R-3 and R-4 zones. Initiate a comprehensive Development Code update to address inconsistencies between the Development Code and the General Plan land use designations and standards. [*Source: New Program*]

- Objective: Accelerate housing production by ensuring that the City's development standards facilitate rather than constrain new development.
- Timeframe: Review and amend development standards by June 2025; initiate Code update to address General Plan consistency by 2027.
- Responsible Department: Planning and Development Services Department (Planning Division)."

vii. During the month of April 2024, as part of the annual progress report to HCD, and each March thereafter until the amendment to the R-3 zone district is completed, City shall provide a written summary to the below entities ("Facilitator") describing City's efforts to complete such changes. Following delivery of the written summary, City and Facilitator may meet and confer to discuss progress and obstacles.

Central California Legal Services
2115 Kern St., Suite 200, Fresno, CA 93721
mkezirian@centralcallegal.org, sborchers@centralcallegal.org
Attention: Executive Director Michelle Kezirian, Litigation Director Stephanie Hamilton Borchers

Public Interest Law Project

449 15th Street, Ste. 301, Oakland, CA 94612-2821
vfeldman@pilpca.org
Attention: Valerie Feldman

Law Office of Patience Milrod
985 N. Van Ness Ave., Fresno, CA. 93728
pm@patiencemilrod.com
Attention: Patience Milrod

Dez Martinez
705 W. University Ave.
Fresno, CA 93705
wearenotinvisible2015@gmail.com

b. **ACTION ITEM 2: LOCAL HOUSING TRUST FUND**: City shall establish a Local Housing Trust Fund ("Housing Trust Fund") for Affordable Housing that meets the requirements of HCD, and shall contribute at least $1.8 million in general fund money to the Housing Trust Fund.

i. City shall establish a Local Housing Trust Fund ("Housing Trust Fund") for affordable housing meeting the requirements of the California Department Housing and Community Development ("HCD") and contribute at least $1.8 million of general fund money to the Housing Trust Fund.

ii. City Council adoption of the Housing Trust Fund shall occur no later than the third regularly scheduled and held City Council meeting after the Notice of Entry of the Stipulated Judgment is served on all parties.

iii. City shall make an initial contribution of $1 million to the Housing Trust Fund to be approved with the Fiscal Year (July 1 – June 30) 2024/2025 budget (July 2024).

iv. City shall budget no less than an additional $100,000.00 contribution to the Housing Trust Fund on an annual basis beginning in July 2025 (FY 2025-26) for a minimum period of eight (8) years, through FY 2032-33, and shall continue until units for the Regional Housing Need Allocation for lower income households in the 2008-2015 Housing Element planning period have been constructed (3,035 units).

v. Transfer of funds to the Housing Trust Fund shall be made based upon State Notice of Funding Availability ("NOFA") timing to maximize the opportunity for state matching funds.

vi. City contributions to the Housing Trust Fund required under this Action Item, including any State match, shall not be used to prefund Development Impact Fee Deferrals/Waivers required by Action Item 6 (Section 2.f. of this Agreement).

vii. Other funding and resources that will contribute to the Housing Trust Fund include: HCD's Permanent Local Housing Allocation Program (PLHA); In Lieu fees paid through a Mixed Income Housing Ordinance as identified in Action Item 5 (Section 2.e. of this Agreement); real property identified in Action Item 3 (Section 2.c. of this Agreement); additional discretionary City funding above the $1.8 million contribution identified herein; interest earned on funds in the account through the Local Agency Investment

Fund ("LAIF"). These funds must also be used for the production and preservation of Affordable Housing.

viii. City may contribute additional general fund or other monies into the Housing Trust Fund in its sole and absolute discretion. Any such contributions in addition to the contributions described above, including any State match resulting specifically from deposits made above and beyond the deposits required, may be used for any purpose authorized by applicable law including but not limited to prefunding Development Impact Fee Deferrals/Waivers as required by Action Item 6 (Section 2.f. of this Agreement).

ix. Other Affordable Housing programs for which the City receives funding but which will not be deposited in the Housing Trust Fund include but are not necessarily limited to: income received from affordable housing programs through the City's former Redevelopment Agency; Community Development Block Grant ("CDBG") funding; CalHOME grants; HOME grants. These additional affordable housing programs, when allowed by the program terms, may be available to augment the Housing Trust Fund on an Affordable Housing project.

x. The Housing Trust Fund, including any real property placed into the Housing Trust Fund, shall be used for production and preservation of permanent housing affordable to LI, VLI, and ELI households. Multi-family units will be required to remain affordable for a minimum of fifty-five (55) years and single-family units will be required to remain affordable for a minimum of forty-five (45) years.

xi. For all Affordable units created pursuant to or as a result of this Action Item 2, the City agrees to enter into affordability agreements and recorded covenants. The affordability agreements and covenants will prescribe requirements such as occupancy, resale, notices to the City of changed circumstances, City's right of first refusal, options to purchase, equity share, and related terms to ensure long term Affordability of all units.

xii. City shall monitor compliance with all Affordability covenants pursuant to an updated Affordable Housing Unit Compliance Monitoring Policy, attached hereto as Exhibit 1, in the same manner and with the same frequency as the City monitors other housing programs utilizing City funds or containing occupancy income restrictions.

xiii. During the month of April 2024, as part of the annual progress report to HCD, and each March thereafter until the Local Housing Trust Fund is fully established, City shall provide a written summary to the Facilitator describing City's efforts to establish the Trust Fund. Following delivery of the written summary, City and Facilitator may meet and confer to discuss progress and obstacles.

c. **ACTION ITEM 3: REAL PROPERTY DEDICATION**:

i. City shall dedicate to the Housing Trust Fund identified in Action Item 2, the following two (2) City owned properties: an approximate 0.89 acre parcel at 650 Fowler Avenue and an approximate 0.43 acre parcel at 354 Osmun Circle ("Initial Property Dedication").

A. The Initial Property Dedication will be dedicated to the Housing Trust Fund within thirty (30) days of creation of the Housing Trust Fund.

B. The Initial Property Dedication will be actively marketed for Affordable Housing development affordable to LI, VLI, or ELI households. The parties acknowledge that the 650 Fowler Avenue parcel will not be available for physical development until at least December 2024.

C. If the Initial Property Dedication does not result in an entitled, permitted Affordable Housing development on either or both parcels by December 31, 2025, City may choose to sell the unentitled and unpermitted parcel(s) included in the Initial Property Dedication. Any sale shall be at fair market value as established by an appraisal by an MAI appraiser and the proceeds of any sale shall be deposited into the Housing Trust Fund.

D. City shall provide a written summary of City's efforts to develop or sell the Initial Property Dedication to the Facilitator during the month of April 2024, as part of the annual progress report to HCD, and each March thereafter until the Initial Property Dedication is developed with affordable housing or sold. Following delivery of the written summary, City and Facilitator may meet and confer to discuss ways to eliminate hurdles to developing or selling the Initial Property Dedication.

ii. City shall either acquire or provide financing to an Affordable Housing developer to purchase a third parcel of real property that will accommodate not less than fifty (50) units of Affordable Housing. If the City acquires the parcel it shall be transferred into the Housing Trust Fund ("Additional Parcel Dedication").

A. City is currently actively identifying parcel(s) to acquire and actively identifying an Affordable Housing developer to enter into a development agreement for a specific parcel, and such efforts will continue following execution of this Agreement.

B. City shall use its best efforts to close escrow on a parcel and/or enter into a development agreement with an Affordable Housing developer no later than December 31, 2024.

C. If City provides financing to an Affordable Housing developer to purchase the Additional Parcel Dedication, City will require the parcel be used for the construction of Affordable Housing units affordable to LI, VLI, or ELI households.

D. During the month of April 2024, as part of the annual progress report to HCD, and each March thereafter until the Additional Parcel Dedication closes escrow and/or a development agreement is executed, City shall provide a written summary to the Facilitator of City's efforts to acquire a parcel and enter into a development agreement. Following delivery of the written summary, City and Facilitator may meet and confer to discuss ways to eliminate hurdles to acquiring a parcel or entering into a development agreement.

iii. For all Affordable units created pursuant to or as a result of this Action Item 3, the City agrees to enter into affordability agreements and recorded covenants prior to the issuance of the Certificate of Occupancy. The affordability agreements and covenants will prescribe requirements such as occupancy, resale, notices to the City of changed circumstances, City's right of first refusal, options to purchase, equity share, and related terms to ensure long term Affordability of all units.

iv. City shall monitor compliance with all Affordability covenants pursuant to the City's

updated Affordable Housing Unit Compliance Monitoring Policy, attached hereto as Exhibit 1, in the same manner and with the same frequency as the City monitors other housing programs utilizing City funds or containing occupancy income restrictions.

d. <u>ACTION ITEM 4: INFILL REZONE PROGRAM</u>: City shall complete an Infill Rezone Program.

i. The Infill Rezone Program is based upon a map and analysis of sites dated December 8, 2023, and delivered to Martinez's counsel on December 8, 2023 ("Sites Map and Analysis"). The Sites Analysis identified 24 parcels, comprising approximately 54 acres, to be re-zoned to R-3 or R-4 creating capacity to provide approximately 1,284 Affordable Housing Dwelling Units. The Sites Map and Analysis is on file with City and with Martinez's counsel, and is attached hereto as Exhibit 2.

ii. The Infill Rezone Program shall be separate, independent, and in addition to any rezone program through which the City is required to accommodate 100 percent of the Regional Housing Needs Assessment ("RHNA") for its 6th Cycle Housing Element (2024-2031), which is currently pending review and approval by HCD.

iii. The Infill Rezone Program shall be initiated by the City Council no later than the third regularly scheduled and held City Council meeting after Notice of Entry of the Stipulated Judgment is served on all parties. Prior to or concurrently with initiation of the Infill Rezone Program, City shall begin the preparation of an Initial Study in accordance with the requirements of Government Code section 65759.

iv. Formal noticing for the Infill Rezone Program shall begin within two (2) weeks after completion of the Initial Study, barring any need to comply with Government Code section 65759(b).

v. City shall use its best efforts to implement the Infill Rezone Program by January 31, 2025, and shall complete the program no later than June 30, 2025.

vi. The Parties recognize that during the Infill Rezone process some parcels may need to be removed and other parcels added, in order to create capacity for 1,284 additional multi-family dwelling units pursuant to this Action Item. If parcels need to be replaced or the unit count on any particular parcel needs to decrease, prior to making any change City shall both 1) provide not less than ten (10) days' notice to Facilitator, and 2) meet and confer regarding the proposed changes. Facilitator shall approve the change if City identifies another parcel of similar size and equal or greater capacity that will be rezoned to R-3 or R-4 prior to removing any of the identified 24 parcels, or decreasing the capacity on any of the identified parcels. Any other changes shall be approved at the discretion of Facilitator following meet and confer with the City.

vii. The parties recognize that there may be unforeseen delays in processing the Infill Rezone Program including legal challenges. In that regard, during the month of April 2024, as part of the annual progress report to HCD, and again in December 2024, and each March thereafter until the City Council has approved rezonings to create capacity for 1,284 units as required by the Infill Rezone Program, City shall provide a written summary to the Facilitator of City's efforts to complete the Infill Rezone Program. Any anticipated delays

beyond January 31, 2025, shall be set forth in the written summary. City and Facilitator shall meet and confer regarding any anticipated delays.

e. **ACTION ITEM 5: MIXED INCOME ZONING ORDINANCE**: City shall adopt a Mixed Income Zoning Ordinance, and shall include a Program to adopt the Ordinance in its 6th Cycle Housing Element that provides that the Ordinance will be adopted within twelve (12) months after Notice of Entry of the Stipulated Judgment is served on all parties, or February 28, 2025, whichever is earlier.

i. City shall retain Keyser Marston Associates ("Consultant"), or a company with comparable experience, under written Contract at City's cost to complete a Financial Feasibility Analysis ("Analysis") for a Mixed Income Zoning Ordinance. City shall approve the written contract within thirty (30) days after Facilitator's written approval of a scope of work for the Analysis as described below.

   A. The parties agree that time is of the essence for achievement of this Action Item 5, and that the Contract with Consultant shall incorporate provisions to expedite the process to the furthest degree possible, with the goal of concluding the Analysis and drafting the Mixed Income Zoning Ordinance for adoption no later than the end of the fourteenth (14) month of the planning period; that is, by February 28, 2025.

   B. The Analysis shall include an evaluation of a range of feasible affordable housing set-aside percentages ("Set-Aside Percentage") for new residential developments in the City of Clovis. The Analysis shall also evaluate feasible complementary mechanisms by which a residential housing developer may meet the required Set-Aside Percentage. Such mechanisms will include, but are not limited to, an in lieu fee ("In Lieu Fee"), land donation, and construction of Affordable Housing units on alternative sites.

   C. The In Lieu Fee analysis shall identify a per-unit or per-square-foot formula for fees sufficient to cover the need for Gap Financing, and to ensure that revenue generated by the In Lieu Fees is sufficient to facilitate the construction of enough Affordable Housing dwelling units to meet the Set Aside Percentage requirement for each new development.

ii. Key components of the Mixed Income Zoning Ordinance, in addition to the Set-Aside Percentage and alternatives, shall include the following:

   A. The adopted ordinance shall establish that in all new residential developments of more than ten (10) units in the City and in any area that may be annexed to the City in the future, a Set Aside Percentage of Affordable Housing units will be required, with fractional units rounded to the nearest whole number.

   B. The Set Aside Percentage shall be the highest percentage supported by the Analysis that does not exceed ten percent (10.0%), and shall be no less than five percent (5.0%) even if the highest percentage supported by the Analysis is less than five percent (5.0%).

   C. The Affordable Housing required by the Set Aside Percentage must be affordable to LI and VLI Households. For Affordable Housing rental units, the ordinance will require that at least fifty percent (50%) of the Affordable Housing units will be

affordable to VLI households and the balance of the Affordable Housing units will be affordable to LI households. One hundred percent (100%) of for-sale Affordable Housing units will be affordable at least to LI Households.

D. Affordable units within a multi-family housing project will be required to remain affordable for not less than fifty-five (55) years and single-family units affordable for not less than forty-five (45) years.

E. A requirement that affordability agreements and recorded covenants be entered into with the City for all Affordable units prior to issuance of a Certificate of Occupancy. The affordability agreements and covenants will prescribe requirements such as occupancy, resale, notices to the City of changed circumstances, City right of first refusal, options to purchase, equity share, and related terms to ensure long term Affordability of all units.

F. City shall monitor compliance with all Affordability covenants pursuant to the City's updated Affordable Housing Unit Compliance Monitoring Policy, attached hereto as Exhibit 1, in the same manner and with the same frequency as the City monitors other housing programs utilizing City funds or containing occupancy income restrictions.

G. City will prepare and present at a City Council meeting an annual report on the status of the Mixed Income Zoning Ordinance, including how many market rate developments are subject to the Mixed Income Zoning Ordinance, how each of these developments satisfied the requirements of the Ordinance, and a record of funds deposited in the Housing Trust Fund. The report will be provided to Facilitator at least ten (10) days prior to the report being presented at City Council.

iii. City shall use its best efforts to complete the Analysis and adopt the Mixed Income Zoning Ordinance within ten (10) months after issuing a notice to proceed to Consultant to begin the Analysis with adoption of the Ordinance no later than twelve (12) months after Notice of Entry of the Stipulated Judgment is served on all parties, or February 28, 2025, whichever is earlier. The Ordinance will be introduced, read, and adopted as an urgency measure, and will go into effect immediately.

iv. City shall meet and confer with Facilitator throughout the process for adopting the Mixed Income Zoning Ordinance. This includes:

A. Obtaining written approval (includes email) from Facilitator of the scope of the Analysis and methodologies to be used.

B. Requiring the Consultant to contact any regional affordable housing developer identified by Facilitator as able to provide important information for the Analysis.

C. Submitting draft(s) of the Analysis to Facilitator for comment at least twenty (20) days before circulation to the general public for comment.

D. Obtaining written approval (includes email) from Facilitator of the final Analysis before processing the Mixed Income Zoning Ordinance for approval before the Planning Commission and City Council.

E. Notifying Facilitator in writing (includes email) at least ten (10) days before any noticed public meetings. Noticed public meetings include community meetings initiated by the City, Planning Commission meetings, and City Council meetings.

F. Notifying Facilitator of any anticipated delays in obtaining the Analysis, conducting public meetings, and approving the Mixed Income Zoning Ordinance.

f. <u>ACTION ITEM 6: DEVELOPMENT IMPACT FEE DEFERRAL/WAIVER PROGRAM</u>: City shall adopt a Development Impact Fee Deferral/Waiver Program.

i. City shall present a written program deferring/waiving development impact fees ("Impact Fee Deferral/Waiver Program") to the City Council for approval no later than the third regularly scheduled and held City Council meeting after Notice of Entry of the Stipulated Judgment is served on all parties, and the Impact Fee Deferral/Waiver Program shall be approved/adopted by the City Council no later than the third regularly scheduled and held City Council meeting after Notice of Entry of the Stipulated Judgment.

ii. The Impact Fee Deferral/Waiver Program shall be available for up to fifty percent (50%) of City's major facility sewer and water fees for up to one hundred twenty (120) deed restricted Affordable Housing units per year. Affordable units constructed pursuant to the Mixed Income Zoning Ordinance shall not be included in this program. Any unused fee deferrals/waivers in a given year shall be carried over to the following year. The reduction shall be as follows:

   A. Low-income: 40%

   B. Very Low-income: 45%

   C. Extremely Low-income: 50%

iii. The Impact Fee Deferral/Waiver Program shall be calculated as a percentage of each development's major facility sewer and water fees, rather than as a prescribed dollar amount.

iv. The Impact Fee Deferral/Waiver Program shall begin as a zero-interest "residual receipts loan," payable in seventeen (17) years, or other term of years as may be required by senior financing. The residual receipts loans shall be as customarily defined in the industry. If the City receives any payments from a residual receipts loan, those payments shall be returned to the Impact Fee Deferral/Waiver Program or Housing Trust Fund and be available for additional affordable housing projects.

v. The Impact Fee Deferral/Waiver Program shall be marketed in the Spring of 2024 following City Council approval/adoption, and available for use starting July 1, 2024.

vi. For all Affordable Housing Dwelling Units benefiting from any fee deferral or waiver pursuant to this Action Item 6, the City agrees to enter into affordability agreements and recorded covenants. The affordability agreements and covenants will prescribe requirements such as occupancy, resale, notices to the City of changed circumstances, City's right of first refusal, options to purchase, equity share, and related terms to ensure long term Affordability of all units.

vii. City shall monitor compliance with all Affordability covenants pursuant to the City's updated Affordable Housing Unit Compliance Monitoring Policy, attached hereto as Exhibit 1, in the same manner and with the same frequency as the City monitors other housing programs utilizing City funds or containing occupancy income restrictions.

viii. City will prepare and present at a City Council meeting an annual report on the status of the Development Impact Fee/Deferral Waiver Program, including how many residential development projects received deferral/waiver of impact fees, and the number of units at each affordability level to be built as a result of the program. The report will be provided to Facilitator at least ten (10) days prior to the report being presented at City Council.

3. Sixth Cycle Housing Element. The parties agree to cooperate toward the City's adoption of a legally compliant 6th Cycle Housing Element.

4. General Release. In consideration of the promises set forth herein, and except as otherwise expressly stated in this Agreement, this Agreement is intended to be and shall act as a full and final settlement and release of all claims set forth in the First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief on file in the Action. Entry of this Agreement as a Stipulated Judgment shall be deemed by the Parties and the Court as having satisfied the terms of the Court's Order issued on April 30, 2021, and Judgment issued on June 1, 2021, any rulings directed towards the Court contained in the April 7, 2023, Fifth District Court of Appeal Opinion, and remittitur issued on July 20, 2023, the Court's August 22, 2023 Order Overruling Demurrer to First Amended Petition for Writ of Mandate After Remand, and any other Orders issued by the Court in this case. Upon entry of the Stipulated Judgment, the remaining fourth, fifth, sixth, seventh (in part), and eighth causes of action in the First Amended Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief shall be dismissed with prejudice.

5. Waiver of Rights Under Civil Code Section 1542. The parties expressly waive and release all rights and benefits afforded by Section 1542 of the California Civil Code and do so understanding and acknowledging the significance and consequence of such specific waiver of Section 1542. Section 1542 of the California Civil Code states as follows:

> ***A general release does not extend to claims that the creditor or releasing party does not know or suspect to exist in his or her favor at the time of executing the release and that, if known by him or her, would have materially affected his or her settlement with the debtor or released party.***

The Parties expressly waive the provisions of California Civil Code section 1542, and further expressly waive any right to invoke said provisions with respect to claims existing now or any time up to the date of the Parties' execution of this Agreement. Therefore, except as expressly provided in this Agreement, the Parties expressly acknowledge that this release is intended to include in its effect, without limitation, all claims and causes of action which they do not know or suspect to exist in their favor and that this release contemplates the extinguishment of all such claims and causes of action arising out of or connected with the Action. In connection with such waiver and relinquishment, the Parties acknowledge that they are aware that they, or their attorney(s), agent(s), or successor(s), may hereafter discover claims or facts in addition to or different from those which they now know or believe to exist with respect to the subject matter of, or any Party named in, this Agreement, but that it is their intention hereby fully, finally, and forever to settle and release all of the released matters. In furtherance of such

intention, each of the releases herein given shall be and remain in effect as a full and complete release notwithstanding the discovery or existence of any such additional or different claims or facts.

6. All Obligations Extinguished by Release. It is expressly understood and agreed that, except as to matters with respect to which the Court will retain jurisdiction pending complete performance (Sections 8 and 9), this Agreement is in full accord, satisfaction, discharge, and compromise of disputed claims up to the date of the Parties' execution of this Agreement, and that this Agreement has been executed with the express intention of effectuating the legal consequences provided for in Section 1541 of the California Civil Code, i.e., the extinguishing of all obligations as herein described. Section 1541 states as follows:

> ***Obligation Extinguished by Release. An obligation is extinguished by a release therefrom given to the debtor by the creditor, upon a new consideration, or in writing, with or without new consideration.***

7. No Admission of Liability. Each Party acknowledges and agrees that this Agreement effects the settlement of claims and potential claims that are contested, disputed, and denied and does not constitute an admission of liability by any Party for any purpose. Moreover, nothing contained in this Agreement, including without limitation the payment of any sums provided for in this Agreement shall be offered, admitted or construed as an admission by any Party of any liability or the amount of any liability to any other Party. Nothing in this Agreement shall be construed as an admission of any liability or wrongdoing of any kind with respect to any matters alleged in or related to the Action. Martinez hereby agrees that the execution, and performance, of this Agreement resolve any and all of her claims related to, or arising from, the City's 2015 Housing Element and the Action, and satisfy all of the City's obligations under the Court's Order issued on April 30, 2021, and the Judgment issued on June 1, 2021.

8. Attorneys' Fees and Costs. Martinez is the prevailing party in the Action, and is entitled to her reasonable attorneys' fees. Martinez's counsel agree to meet and confer with City in an effort to reach a resolution on the issue of attorneys' fees and costs incurred in the Superior Court. Only if such a meet-and-confer is unsuccessful will Martinez seek an award of reasonable attorneys' fees from the Court. Any such motion for an award of attorneys' fees and costs must be filed and served on the City's counsel no later than one hundred twenty (120) days from the date the Notice of Entry of the Stipulated Judgment is served on all parties, unless such time is further extended by a stipulation approved by the Court, or by a court order; the prevailing party on any attorneys' fees motion will be entitled to costs and attorneys' fees incurred in bringing and litigating the motion. The Court of Appeal awarded costs on appeal and City will pay the amount of costs requested in Martinez's Memorandum of Costs on Appeal filed and served on August 24, 2023. Payment shall be made to Central California Legal Services at the same time City remits payment of the agreed upon or court-ordered attorneys' fees.

9. Stipulated Judgment and Retention of Jurisdiction. Upon execution of this Agreement by all parties, the Parties shall jointly request the Court enter a Stipulated Judgment that incorporates this Agreement. The Parties agree, stipulate and request that the Fresno County

Superior Court shall maintain jurisdiction of the Action and the Parties until the obligations of the Parties under this Agreement have been fully performed or excused. The Fresno County Superior Court may enforce this Agreement pursuant to Code of Civil Procedure section 664.6.

10. Meet and Confer Before Seeking Court Relief. The Parties agree to make a good faith effort to meet and confer to resolve any concerns about the performance of any obligations under the terms of this Agreement before filing any request for enforcement of this Agreement with the Fresno County Superior Court. The Parties agree that for the purposes of this Agreement, good faith means: (1) providing written notice to the opposing party at least thirty (30) days prior to filing any motion to seek enforcement with the Court; (2) providing the opposing party an opportunity to cure during the thirty (30) day period; and (3) meeting with the opposing party's representatives and counsel within ten (10) days after providing said notice to attempt to resolve the dispute. The Parties, by stipulation, may modify or extend any of the deadlines or terms of this Agreement. Any party that successfully enforces the terms of this Agreement may recover attorneys' fees and costs expended in the enforcement from the opposing party.

11. Cooperation/Execution of Supplemental Documents. The Parties agree to cooperate fully, at their own cost and expense, in carrying out the terms and conditions of this Agreement, including taking further action that may be reasonably necessary to implement the Action Items or the terms of this Agreement.

12. Amendments; Waiver. No supplement, modification, or amendment to this Agreement will be binding unless executed in writing by each Party or a duly authorized representative or legal counsel of each Party. No waiver of any provisions of this Agreement will be deemed or will constitute a waiver of any other provision, whether or not similar, nor will any waiver constitute a continuing waiver. No waiver shall be binding unless executed in writing by the Party making the waiver.

13. Governing Law. This Agreement shall be interpreted, enforced, and governed by California law.

14. Binding Effect. The rights and obligations specified in this Agreement shall inure to the benefit of and bind the respective successors, heirs, next of kin, personal representatives, assigns, affiliates, and agents of the Parties.

15. Notices. All notices required or authorized pursuant to this Agreement shall be sent, in writing, via U.S. Mail or email to each of the following:

For City:

Scott Cross, City Attorney
Lozano Smith
7404 N. Spalding Avenue
Fresno, CA 93720

For Martinez:

Valerie Feldman
Public Interest Law Project
449 15th Street, Ste. 301
Oakland, CA 94612-2821
vfeldman@pilpca.org

Dez Martinez
705 W. University Ave.
Fresno, CA 93705
wearenotinvisible2015@gmail.com

City of Clovis
John Holt, City Manager
1033 Fifth Street
Clovis, CA 93612

Patience Milrod, Esq.
985 N. Van Ness Avenue
Fresno, CA 93728
pm@patiencemilrod.com

Michelle Kezirian, Executive Director
Stephanie Hamilton Borchers
Royce Stuteville
Central California Legal Services
2115 Kern Street, Suite 200
Fresno, CA 93721
mkezirian@centralcallegal.org
sborchers@centralcallegal.org
rstuteville@centralcallegal.org

Any Party may change the address(es) for notice purposes by providing prior notice of such change to the other Party as provided herein.

16. Execution in Counterparts. This Agreement may be executed in counterparts such that the signatures may appear on separate signature pages. Copies of signatures, including electronic copies of signatures, shall be deemed original signatures for all purposes. In addition, any Party may execute a copy of this Agreement that has been transmitted to the signing party by email or facsimile. A copy, facsimile or an original, with all signatures appended together, shall be deemed a fully executed Agreement.

17. Severability. If any provision of this Agreement as applied to any Party or to any circumstance is adjudged by a court to be void or unenforceable, the same shall in no way effect any other provision of this Agreement or the validity or enforceability of the Agreement as a whole, and the remaining provisions of the Agreement shall remain in full force and effect.

18. Voluntary Agreement; Opportunity to Consult Counsel. Each Party hereby affirms, acknowledges, and warrants that such Party has been adequately represented by competent legal counsel during the Action and the negotiation of this Agreement, and has completely reviewed the terms of this Agreement with such Party's own legal counsel and is fully informed and understands and appreciates the meaning and effect of this Agreement, and voluntarily accepts the benefits and obligations thereof.

19. Interpretation. This Agreement is the result of the combined efforts of the Parties and/or their respective attorneys and shall be construed according to its fair meaning and as if prepared by both Parties hereto. If any provision of this Agreement is found ambiguous, the

ambiguity shall not be resolved by construing this Agreement in favor of or against any Party, but by construing the terms according to their generally accepted meaning.

20. Headings and Captions. The headings appearing in this Agreement have been inserted for the purpose of convenience and ready reference. They do not purport to and shall not be deemed to define, limit, or extend the scope or intent of the sections or paragraphs to which they appertain.

21. Entire Agreement. This Agreement, together with the documents incorporated herein by reference and any exhibits referenced herein and attached hereto, constitutes the entire understanding and agreement among the Parties regarding the subject matters set forth in this Agreement, and supersedes any and all other discussions, agreements, negotiations or understandings, either oral or in writing, express or implied, between the Parties to the same, other than a court determination or settlement of the amount of attorneys' fees and costs. No other representations, covenants, undertakings, or other prior or contemporaneous agreements, oral or written, respecting such matters, which are not specifically incorporated herein, shall be deemed in any way to exist or bind any of the Parties. Each Party signing this Agreement represents and acknowledges that such Party has not executed this Agreement in reliance on any promise, representation, conduct or warranty of any other Party not expressly set forth in this Agreement.

22. Authority to Sign Agreement. Each of the signatories to this Agreement represents and warrants that he or she is competent and authorized to sign and enter into this Agreement on behalf of the Party to whom he or she purports to sign.

WHEREFORE, Martinez and City, by the respective signatures below, enter into this Agreement effective on the Effective Date provided above.

///

///

[Remainder of page is blank – signatures on page 17]

City of Clovis, a California Municipal Corporation

By: _____
John Holt, City Manager

ATTEST:

By: _____
~~Karey Cha~~, City Clerk
Andrew Haussler

APPROVED AS TO FORM:

By: _____
Scott G. Cross, City Attorney

Desiree Martinez

By: _____

APPROVED AS TO FORM:

Public Interest Law Project

By: _____
Valerie Feldman, Attorney for Desiree Martinez

Patience Milrod

By: Patience Milrod
Patience Milrod, Attorney for Desiree Martinez

Central California Legal Services

By: _____
Stephanie Hamilton Borchers, Attorney for Desiree Martinez

City of Clovis, a California Municipal Corporation

By: _____
John Holt, City Manager

ATTEST:

By: _____
Karey Cha, City Clerk

APPROVED AS TO FORM:

By: _____
Scott G. Cross, City Attorney

Desiree Martinez

By: _____

APPROVED AS TO FORM:

Public Interest Law Project

By: Val Fe
Valerie Feldman, Attorney for Desiree Martinez

Patience Milrod

By: Patience Milrod
Patience Milrod, Attorney for Desiree Martinez

Central California Legal Services

By: _____
Stephanie Hamilton Borchers, Attorney for Desiree Martinez

CITY OF CLOVIS POLICY FOR AFFORDABLE HOUSING UNIT COMPLIANCE MONITORING

EXHIBIT 1

City of Clovis

Policy for Affordable Housing Unit Compliance Monitoring

The City of Clovis will use this policy to develop and implement guidelines to monitor and preserve the affordability of the housing units developed by the following Affordable Housing Programs ("Programs"):

- Affordable Housing Trust Fund
- Mixed Income Zoning Ordinance
- Affordable Housing Development Impact Fee Deferral Program

1. Deed Restrictions/Affordability Covenants:
   All units developed by the Programs shall have deed restrictions recorded requiring the units to remain affordable, for the applicable income level and for the applicable affordability period - forty-five (45) years for ownership units, and fifty-five (55) years for multi-family rental units.

2. Annual Occupancy Restrictions and Certifications:
   The City shall conduct an annual occupancy review and certification process consisting of the following by each November for all Program units.

   Owner-Occupant Units:

   The City will require owner-occupants to annually certify occupancy during the affordability period by submitting utility bills or other documentation of proof or occupancy in the unit as the owner-occupant's primary place of residence.

   Rental Units:

   The City will require Owner/Developer/Property Manager to annually certify the income eligibility of the occupants during the affordability period by submitting income documentation or a third-party regulatory report such as TCAC or HCD annual reviews.

3. Required Noticing and Restrictions on Any Changes of Title or Occupancy:

   In all cases where there is a change in title, occupancy, or use of the unit, the Occupant/Owner/Developer/Property Manager must notify the City in writing of any change within 30 days. City and Occupant/Owner/Developer/Property Manager shall work together to ensure the unit is kept in compliance with the original Program terms and conditions such that it remains available as affordable housing for lower income households at the applicable income level for the duration of the affordability period. Changes in title, occupancy, or use of any unit must be in keeping with the objective of benefiting lower income households at the applicable income levels identified at the time of construction.

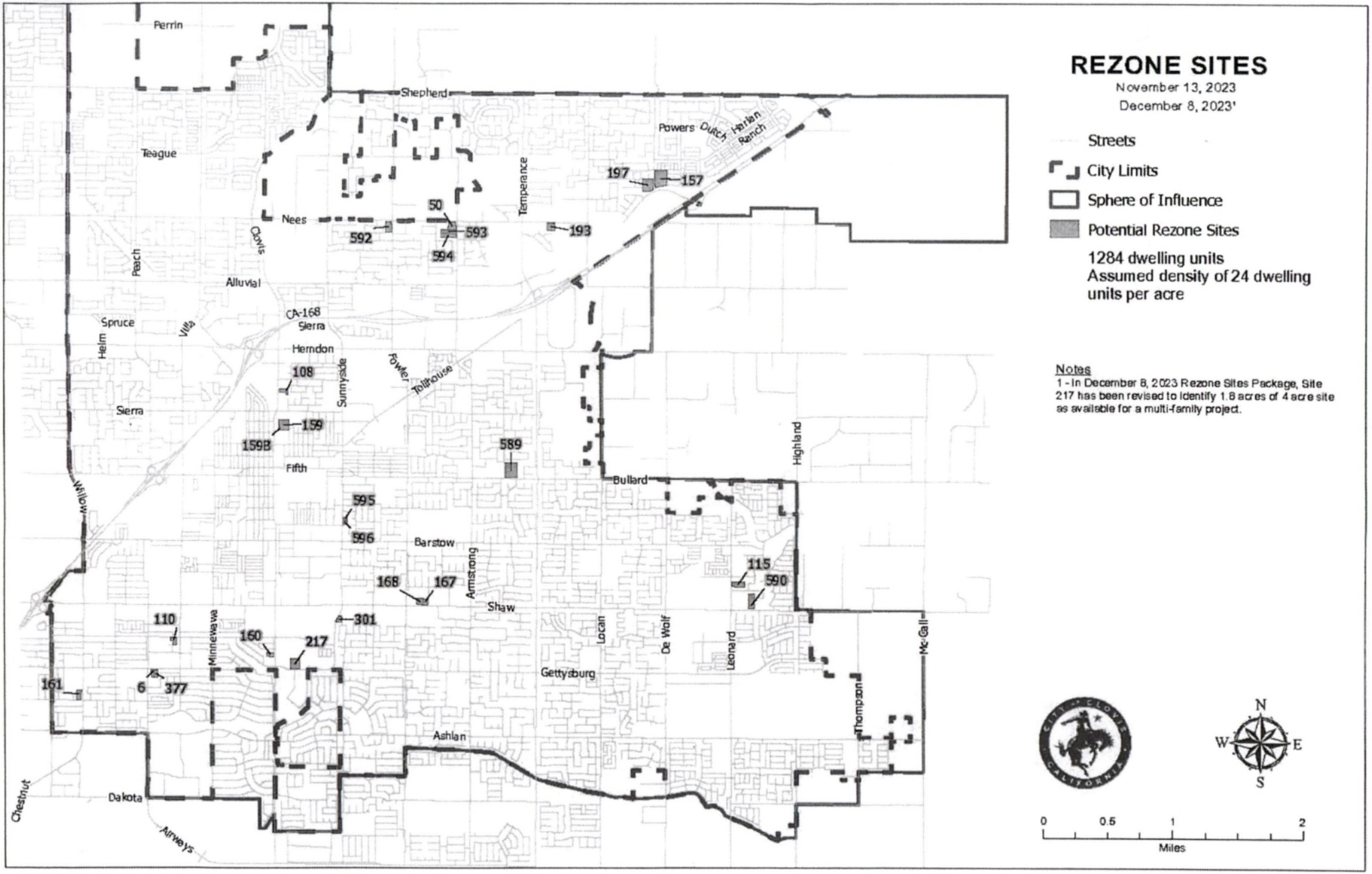
4. Consequence of Failure to Comply

If any occupant/owner/developer/property manager fails to comply with the applicable affordability requirements, the City will exercise its rights to enforce the affordability restriction and gain compliance, up to and including foreclosure and eviction. Following any foreclosure and/or eviction, the City shall maintain the unit as affordable and available to eligible lower income households for no less than the duration of the original affordability period, including, if necessary, recording a new deed restriction and/or affordability covenants.

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REZONE SITES MAP AND ANALYSIS

EXHIBIT 2


REZONE SITES
November 13, 2023
December 8, 2023'
Streets
City Limits
Sphere of Influence
Potential Rezone Sites
1284 dwelling units
Assumed density of 24 dwelling units per acre
Notes
1 - In December 8, 2023 Rezone Sites Package, Site 217 has been revised to identify 1.8 acres of 4 acre site as available for a multi-family project.
Perrin
Shepherd
Teague
Nees
Alluvial
Spruce
Herndon
Sierra
Fifth
Barstow
Shaw
Gettysburg
Ashlan
Dakota
Bullard
Powers
Dutch Harlan Ranch
Temperance
Peach
Clovis
Villa
Helm
Willow
Sunnyside
Fowler
Tollhouse
Highland
Armstrong
Minnewawa
Logan
De Wolf
Leonard
Thompson
McCall
Chestnut
Airways
CA-168
50
592
593
594
193
197
157
108
159
159B
589
595
596
168
167
115
590
110
301
160
217
161
6
377
0
0.5
1
2
Miles
N
W
E
S

						ASSUMED DENSITY (DU/AC)	24															
Site ID	APN	GP landuse Code	Zoning	Size	Existing Use	Units	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
6	49931154	GC	C-2	0.90	Vacant. Southern end - parking lot. Abuts Site 377 & Same Owner	22	N	N	N	Y	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y
50	56324504	L	R-1-7500	2.30	Vacant	55	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y
108	49123124	M	C-2	1.25	Vacant	30	N	Y	N	Y	Y	Y	N	Y	Y	N	Y	N	Y	Y	N	Y	Y
110	49906074	M	R-1	1.25	Vacant	30	N	N	Y	Y	Y	N	N	Y	Y	N	Y	N	Y	Y	N	Y	Y
115	554570445	M	R-1	2.31	Vacant	56	N	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y
157	558083595	MU-V	P-C-C	7.24	Vacant	174	N	N	N	N	N	Y	N	Y	N	N	N	N	Y	Y	N	Y	Y
159	49208092	MU-V	M-U	3.78	Primarily Vacant - 1 vacant bldg. (Marketed for MF) Abuts 159B & Same Owner	91	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y
159B	492010545	MU-V	M-U	0.42	Vacant - Abuts 159 & Same owner	10	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y
160	499134205	NC	C-P	1.08	Vacant	25	N	N	Y	Y	Y	N	N	Y	N	N	N	N	Y	Y	N	Y	Y
161	43043316	O	C-P	1.67	Vacant	40	N	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	Y	Y	Y
167	55128004	O	C-P	1.04	Vacant Abuts 168 - Same owner	25	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	Y
168	55128008	O	C-P	1.30	Vacant Abuts 167 - Same owner	31	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	Y
193	56406042	VL	R-A	2.10	Vacant	51	Y	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	N	Y	Y
301	49908121	O	C-P	0.94	Vacant	23	N	N	Y	Y	Y	N	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y
377	49931155	GC	C-2	0.81	Vacant. Southern end - parking lot. Abuts Site 6 & Same Owner	19	N	N	N	Y	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y
589	55026023	L	R-A	8.01	Former Rogers Helpicopter. Owner interested in MF Project.	192	Y	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	Y	Y	Y
590	554580345	M	R-1	3.02	SFR. Owner interested in MF	72	N	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y
593	56324505	L	R-1-7500	2.30	SFR. Owner interested in MF Abuts 594 - Same Owner	55	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y
594	56324506	L	R-1-7500	2.30	SFR. Owner interested in MF Abuts 593 - Same Owner	55	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y
595	49817202	L	R-1	0.41	Vacant Abuts 596 - Same Owner	10	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	Y	N	Y	Y
596	49817201	L	R-1	0.72	Vacant Abuts 595 - Same Owner	17	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	Y	N	Y	Y
NEW SITES ADDED 11-15-23 TO ACCOMMODATE 50+ UNITS																						
197	55849230	VL	R-1-AH	4.5	Existing rural residential home.	108	N	N	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y
217	49954013ST	I	M-1	1.80	Commerical business - Clovis Acadmeny of Gymnastics and Dance	43	N	N	Y	Y	Y	N	N	Y	N	N	N	N	Y	Y	N	Y	Y
592	56308131	L	R-A	2.09	Existing rural residential home.	50	N	N	N	N	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y
TOTAL				58.50		1,284																	

SITE 6

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
6	N	N	N	Y	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y



SITE 50

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
50	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y



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Displayed features: 1/1

Parcels - Clovis: 56324504

APN	56324504
Created By	BILLF
Created When	5/17/2019
Modified By	STEPHANIEA
Modified When	9/25/2019
NAME1	DA REAL ESTATE HOLDINGS LLC
NAME2	
ADDRESS1	1396 W HERNDON #101
ADDRESS2	FRESNO CA 93711
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	6/29/2021

SITE 108

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
108	N	Y	N	Y	Y	Y	N	Y	Y	N	Y	N	Y	Y	N	Y	Y



Percels - Clovis _Query result

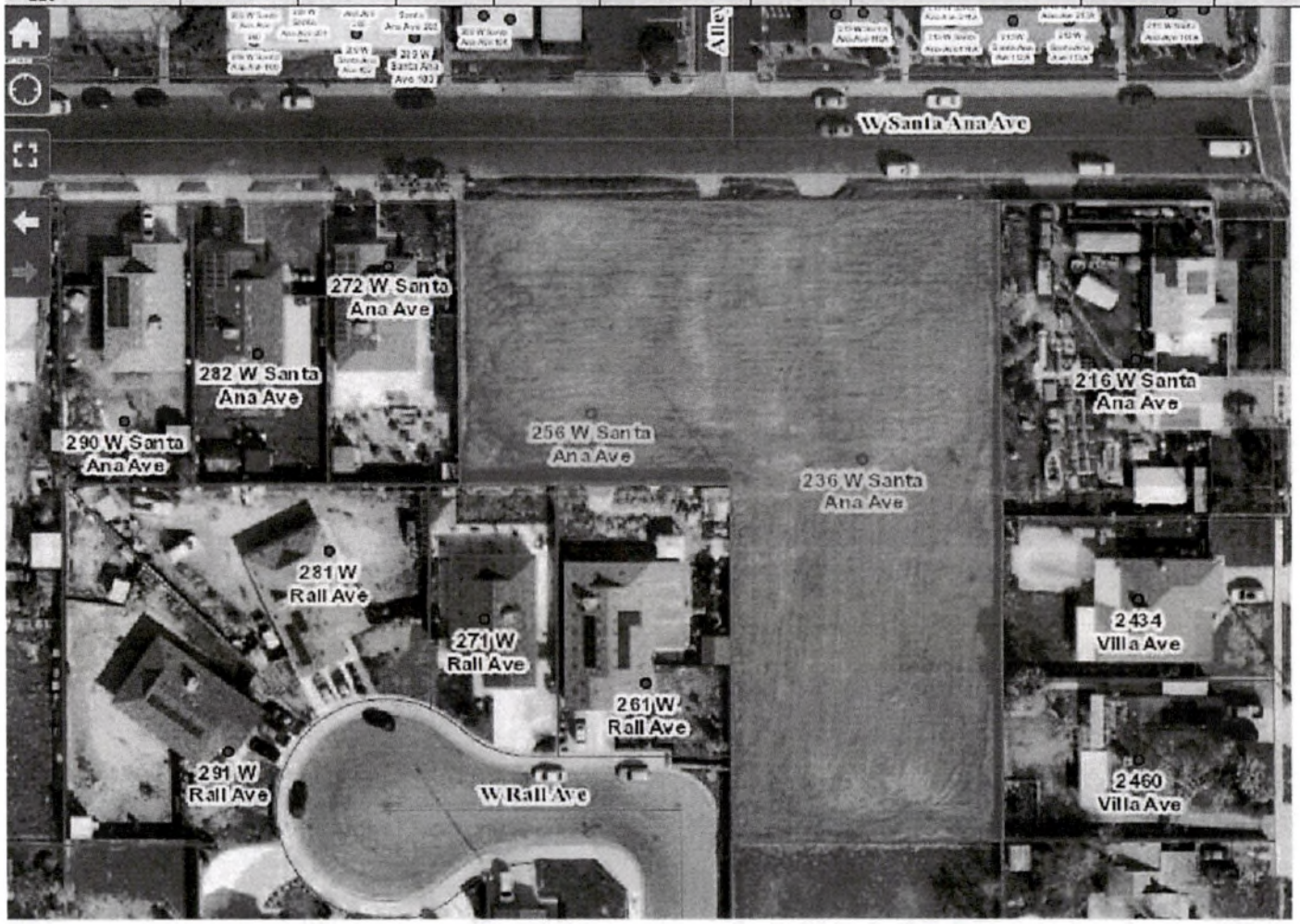
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Parcels - Clovis: 49123124

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Created When	5/17/2019
Modified By	STEPHANIEA
Modified When	9/25/2019
NAME1	JOHN GREGORY DEVELOPMENT CO INC
NAME2	
ADDRESS1	301 E HILLCREST
ADDRESS2	FRESNO CA 93720
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	6/26/2012
RECORDING_DATE1	6/26/2012
INSTRUMENT_NUMBER1	0089115
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	
RECORDING_DATE2	

SITE 110

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
110	N	N	Y	Y	Y	N	N	Y	Y	N	Y	N	Y	Y	N	Y	Y



Parcels - Clovis _Query result

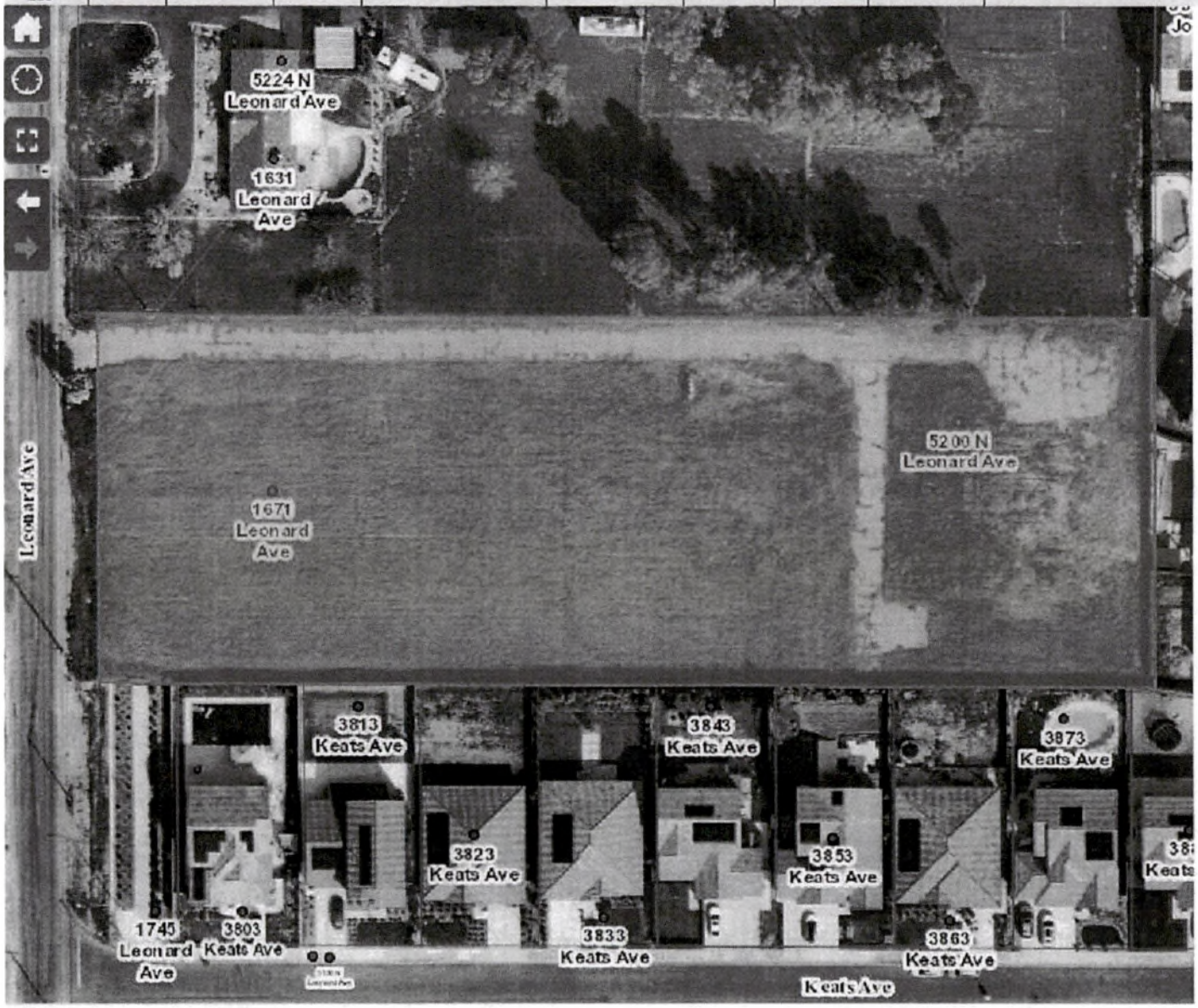
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Parcels - Clovis: 49906074

APN	49906074
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Created When	5/17/2019
Modified By	STEPHANIEA
Modified When	9/25/2019
NAME1	ATTIA AMIN KAMAL
NAME2	
ADDRESS1	P O BOX 3335
ADDRESS2	CLOVIS CA 93613
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	1/6/2015
RECORDING_DATE1	1/6/2015
INSTRUMENT_NUMBER1	0001414
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	12/31/1999
RECORDING_DATE2	

SITE 115

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
115	N	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y



Parcels - Clovis _Query result

Displayed features: 1/1

Parcels - Clovis: 55457044S

APN	55457044S
Created By	BILLF
Created When	5/17/2019
Modified By	STEPHANIEA
Modified When	6/1/2020
NAME1	SULTAN INTISAB & NOREEN INTISAB TRS
NAME2	
ADDRESS1	7301 N FANCHER
ADDRESS2	CLOVIS CA 93619
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	10/22/2019
RECORDING_DATE1	10/22/2019
INSTRUMENT_NUMBER1	0127046
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	10/22/2019
RECORDING_DATE2	
INSTRUMENT_NUMBER2	0000000
WORD_DESCRIPTION	1671 LEONARD CL
LOT_WIDTH	0.00
LOT_DEPTH	0.00

SITE 157

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
157	N	N	N	N	N	Y	N	Y	N	N	N	N	Y	Y	N	Y	Y



SITE 159

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
159	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y



SITE 159B

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
159B	N	Y	N	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y

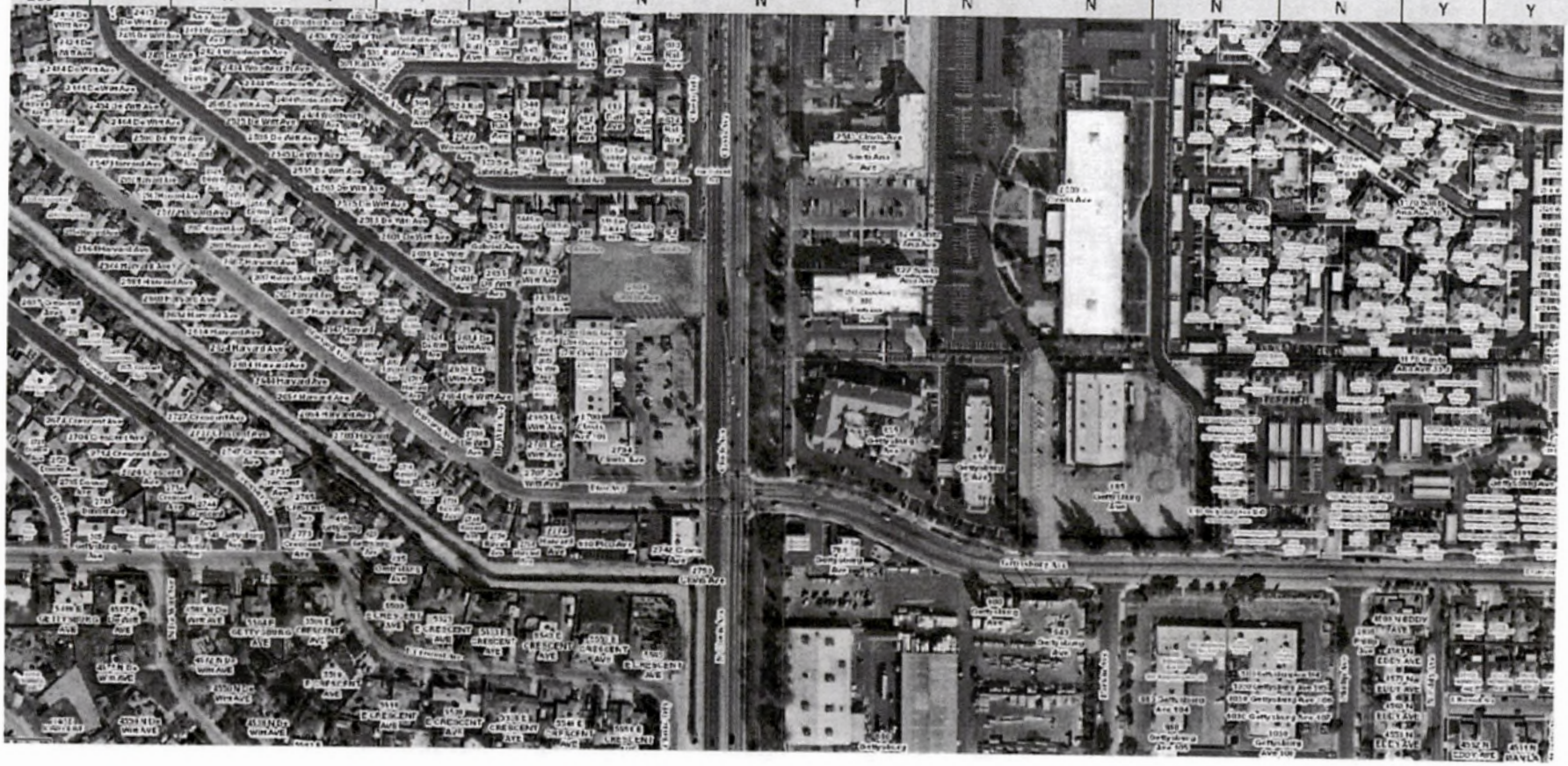


Parcels - Clovis 492010545

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INSTRUMENT_NUMBER2	000000
LOT_WIDTH	45.00
TOTAL_ASSESSED_VALUE	223,101
ASSESS_LAND_VAL	223,101
TFLVALUE	0
PERS_PROP_VAL	0
MOBILE_HOME_VAL	0
HOMEOWNER_EXEMP	0

SITE 160

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
160	N	N	Y	Y	Y	N	N	Y	N	N	N	N	Y	Y	N	Y	Y



SITE 161

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
161	N	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	Y	Y	Y



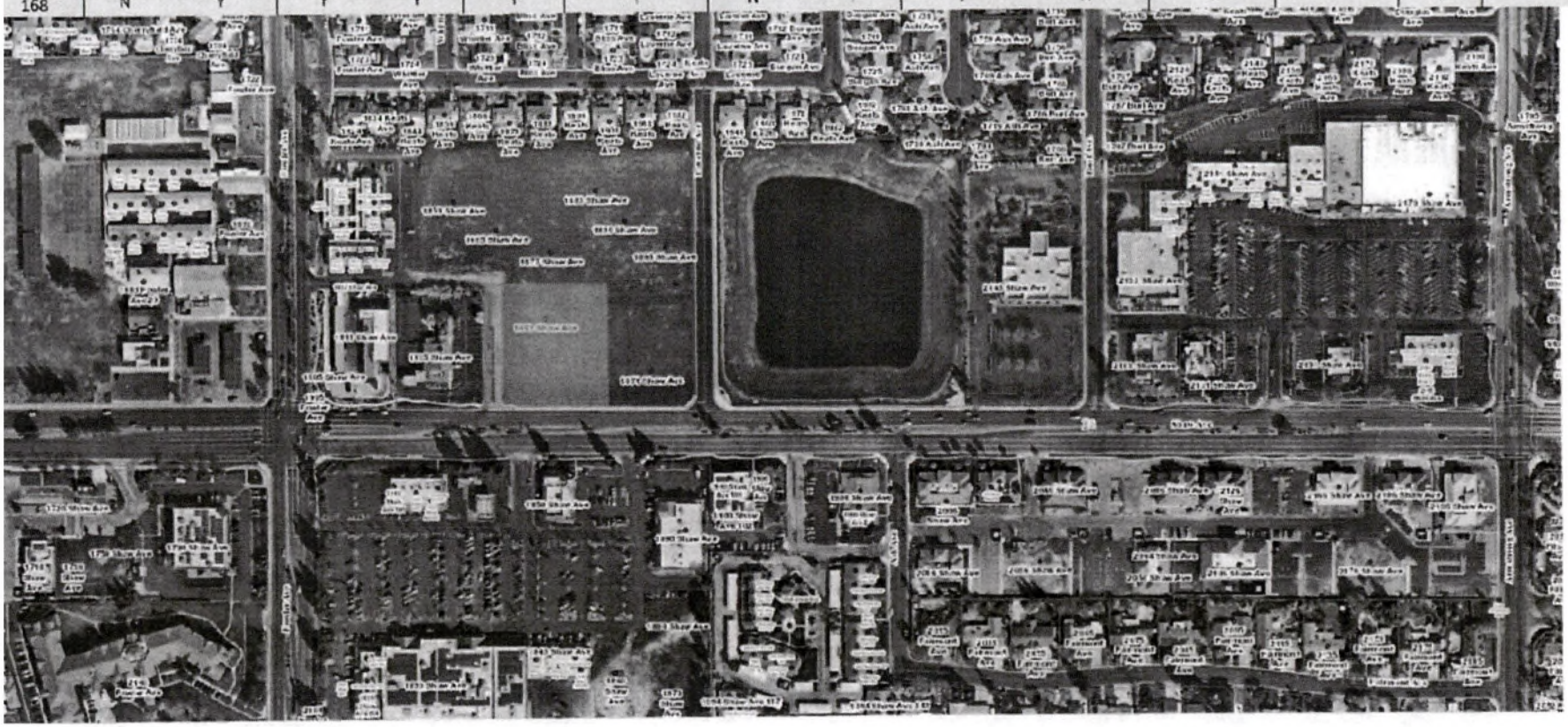
SITE 167

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
167	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	Y



SITE 168

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
168	N	Y	Y	Y	Y	Y	N	Y	Y	N	Y	Y	Y	Y	N	Y	Y



SITE 193

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
193	Y	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	N	Y	Y



Parcels - Clovis_Query result

Displayed features:1/1

Parcels Clovis: 56406042

APN	56406042
Created By	BILLF
Created When	5/17/2019
Modified By	STEPHANIEA
Modified When	9/25/2019
NAME1	DA REAL ESTATE LLC
NAME2	
ADDRESS1	1395 W HERNDON #101
ADDRESS2	FRESNO CA 93711
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	3/16/2021
RECORDING_DATE1	3/16/2021
INSTRUMENT_NUMBER1	0044751
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	
RECORDING_DATE2	
INSTRUMENT_NUMBER2	0000000
WORD_DESCRIPTION	2780 E NEES CL
LOT_WIDTH	210.00

SITE 197

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
197	N	N	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y



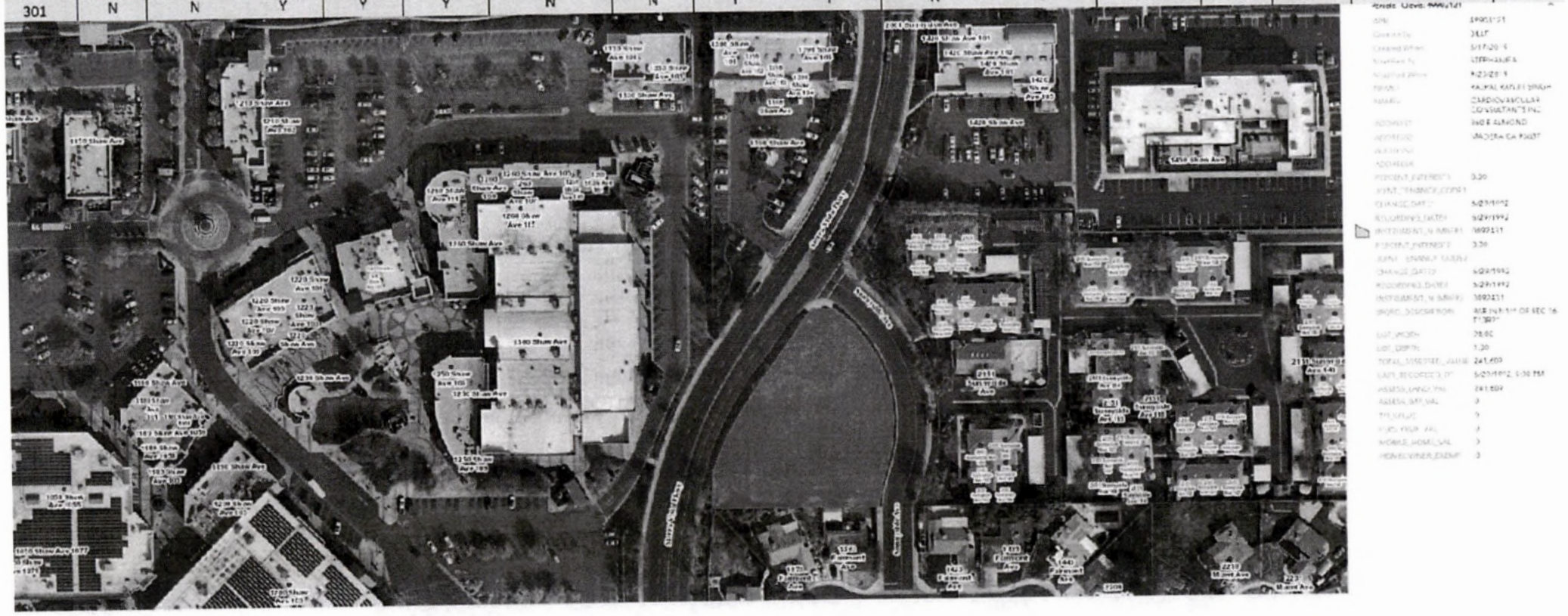
SITE 217 REVISED 12-8-23

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
217	N	N	Y	Y	Y	N	N	Y	N	N	N	N	Y	Y	N	Y	Y



SITE 301

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
301	N	N	Y	Y	Y	N	N	Y	Y	N	Y	N	Y	Y	Y	Y	Y



SITE 377

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
377	N	N	N	Y	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y



Tasks | Results

Parcels - Clovis_Query result

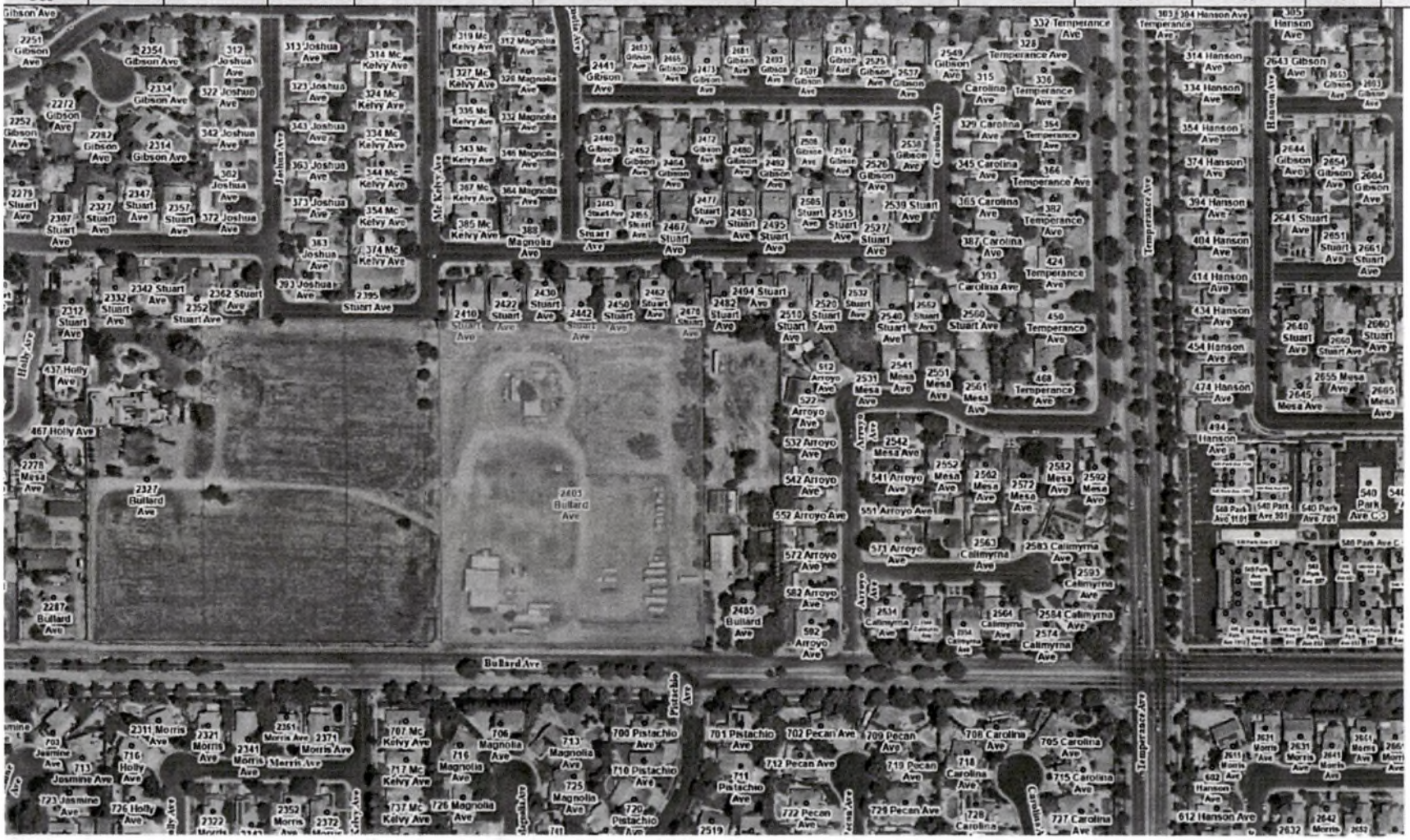
Displayed features:1/1

Parcels Clovis 49931155

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Created By	BILLF
Created When	5/7/2019
Modified By	STEPHANIEA
Modified When	2/27/2020
NAME1	DAVIS ROBERT KELSEY & BRENDA BERLENE
NAME2	
ADDRESS1	17922 E TOLLHOUSE
ADDRESS2	CLOVIS CA 93611
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	RS
CHANGE_DATE1	5/7/2019
RECORDING_DATE1	5/7/2019
INSTRUMENT_NUMBER1	0047485
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	
RECORDING_DATE2	
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WORD_DESCRIPTION	E115.50 FT OF PAR A PK 22/97 & OF PAR B

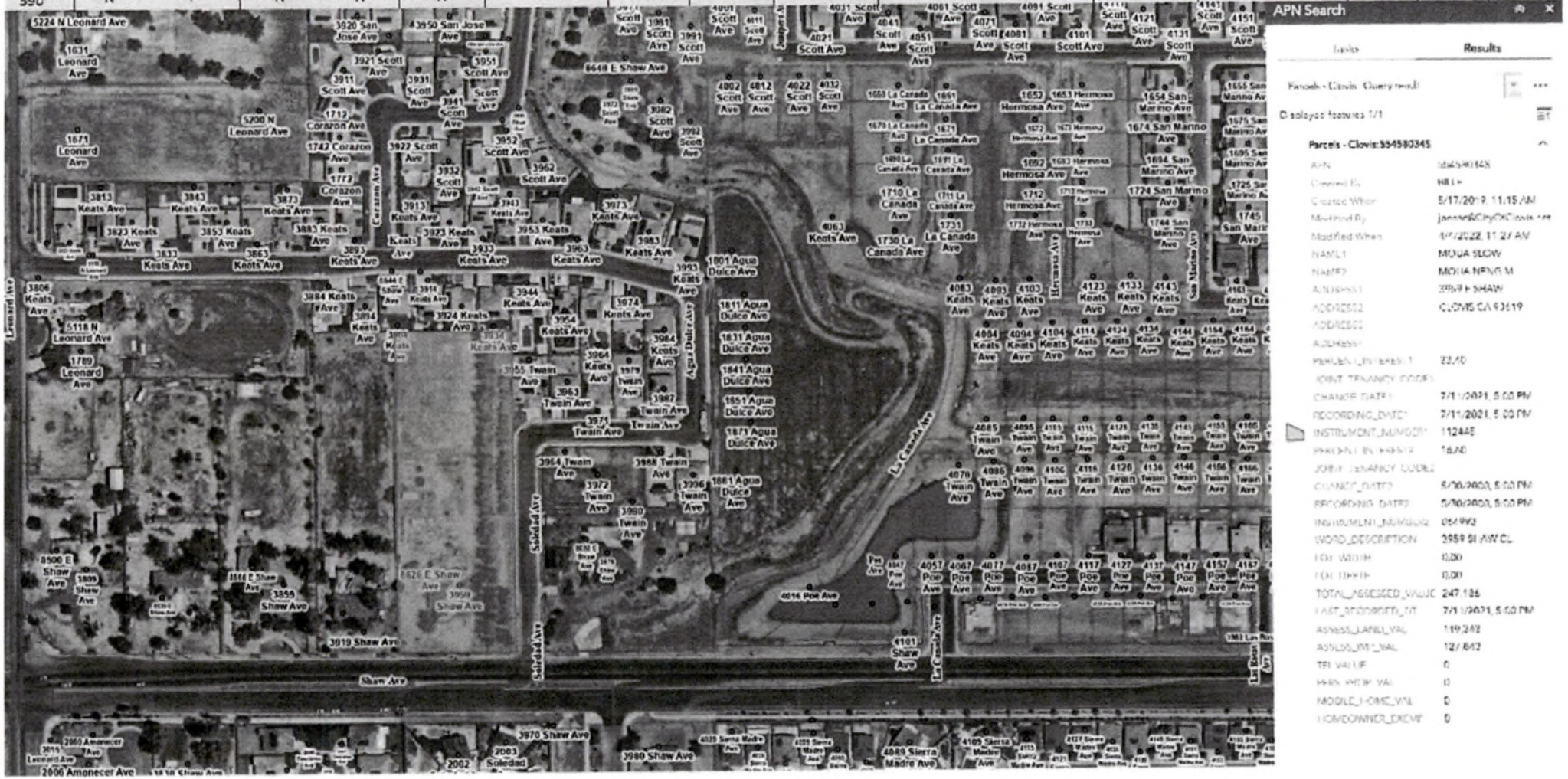
SITE 589

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
589	Y	N	N	Y	Y	Y	N	N	N	N	N	N	Y	Y	Y	Y	Y



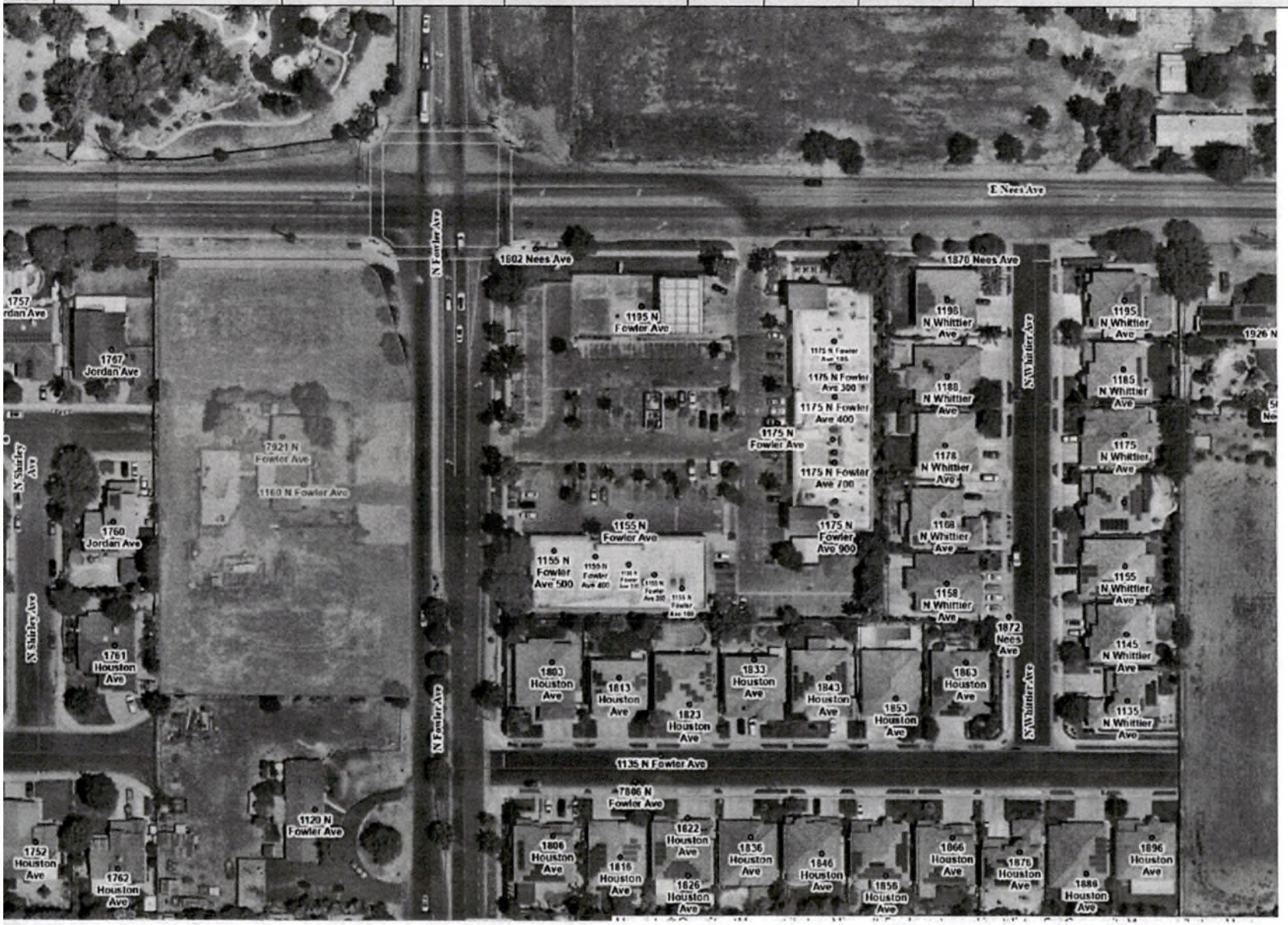
SITE 590

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
590	N	Y	N	N	N	Y	N	N	N	N	N	N	Y	Y	N	Y	Y



SITE 592

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
592	Y	N	N	N	N	Y	N	N	N	N	Y	N	Y	Y	N	Y	Y



Parcels - Clovis 56303131

APN	56303131
Created By	BELT
Created When	5/17/2019 11:15 AM
Modified By	STEPHANIEA
Modified When	9/29/2019 9:55 PM
NAME1	CUI XUEWEN S & DO YU HS
NAME2	SHI XIANGYANG & YANHUA WU HS
ADDRESS1	2038 E REVERE
ADDRESS2	FRESNO CA 93720
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	0.00
JOINT_TENANCY_CODE1	
CHANGE_DATE1	5/26/2021 5:00 PM
RECORDING_DATE1	5/26/2021 5:00 PM
INSTRUMENT_NUMBER1	087965
PERCENT_INTEREST2	0.00
JOINT_TENANCY_CODE2	
CHANGE_DATE2	5/26/2021 5:00 PM
RECORDING_DATE2	5/26/2021 5:00 PM
INSTRUMENT_NUMBER2	087965
MORE DESCRIPTION	1160 N FOWLER CL
LOT_WIDTH	209.00
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LAST RECORDED DT	5/26/2021 5:00 PM
ASSES_LAND_VAL	208,080
ASSES_IMP_VAL	343,332
TFI_VALUE	0
PERS PROP VAL	0
MOBILE HOME VAL	0
HOMEOWNER_EXEMP	0

SITE 593

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
593	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y



SITE 594

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
594	Y	N	N	N	N	Y	N	N	N	N	Y	Y	Y	Y	N	Y	Y



Parcels - Clovis_Query result

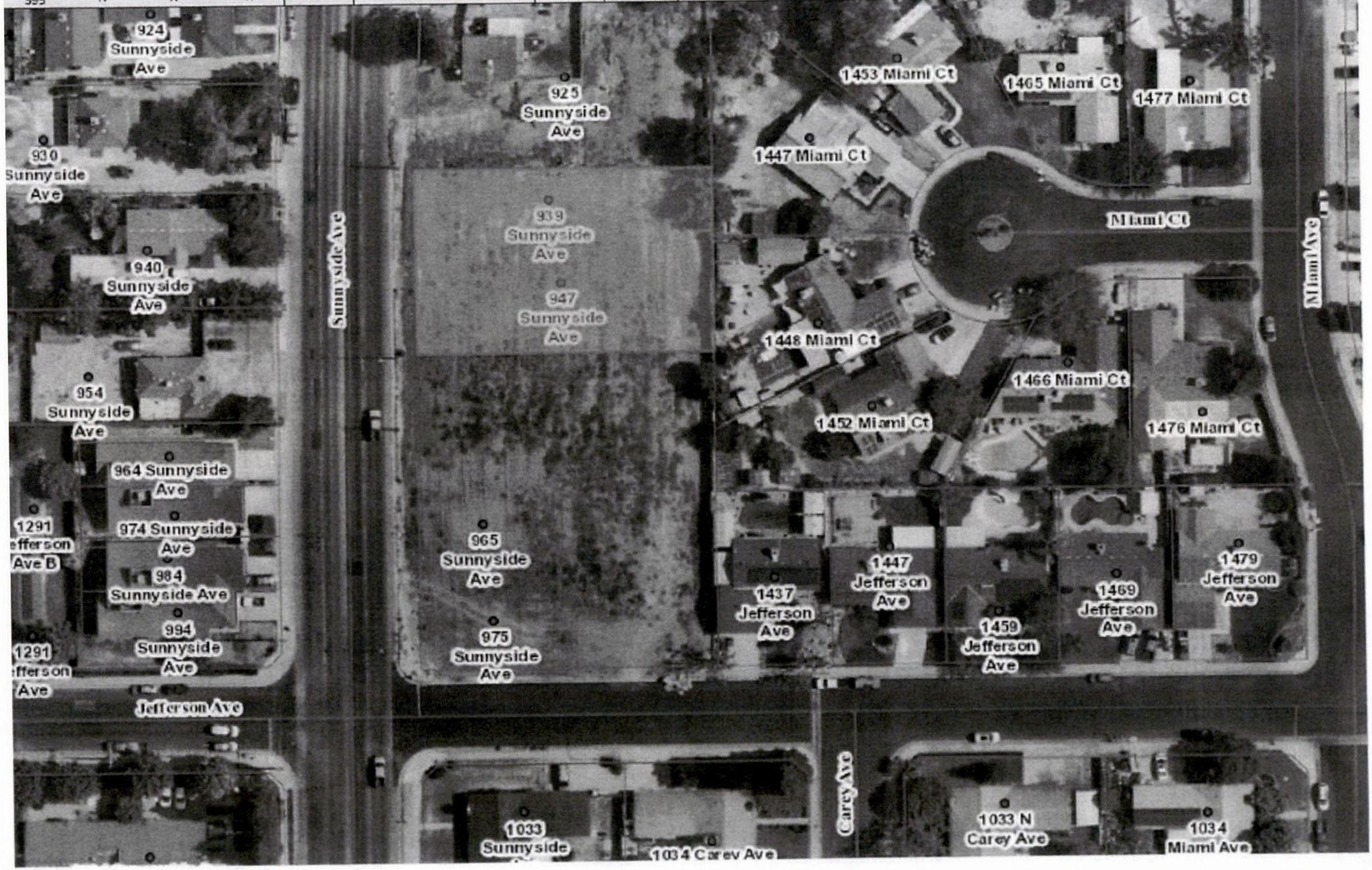
Displayed features: 1/1

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CreatedWhen	9/11/2019 11:15 AM
ModifiedBy	STEPHANIEA
ModifiedWhen	4/25/2019 11:13 PM
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NAME2	
ADDRESS1	
ADDRESS2	
ADDRESS3	
ADDRESS4	
PERCENT_INTEREST1	
JOINT_TENANCY_CODE1	
CHANGE_DATE1	
RECORDING_DATE1	
INSTRUMENT_NUMBER1	
PERCENT_INTEREST2	
JOINT_TENANCY_CODE2	
CHANGE_DATE2	
RECORDING_DATE2	
INSTRUMENT_NUMBER2	
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LOT_WIDTH	230.00
LOT_DEPTH	1.00
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LAST_RECORDED_DT	6/29/2021 5:00 PM
ASSESS_AND_VAL	520,200
ASSESS_MP_VAL	0
TP_VALUE	0
PARS_PROP_VAL	0
MARKET_HOMP_VAL	0
HOMEOWNER_EXEMP	0

SITE 595

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
595	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	Y	N	Y	Y



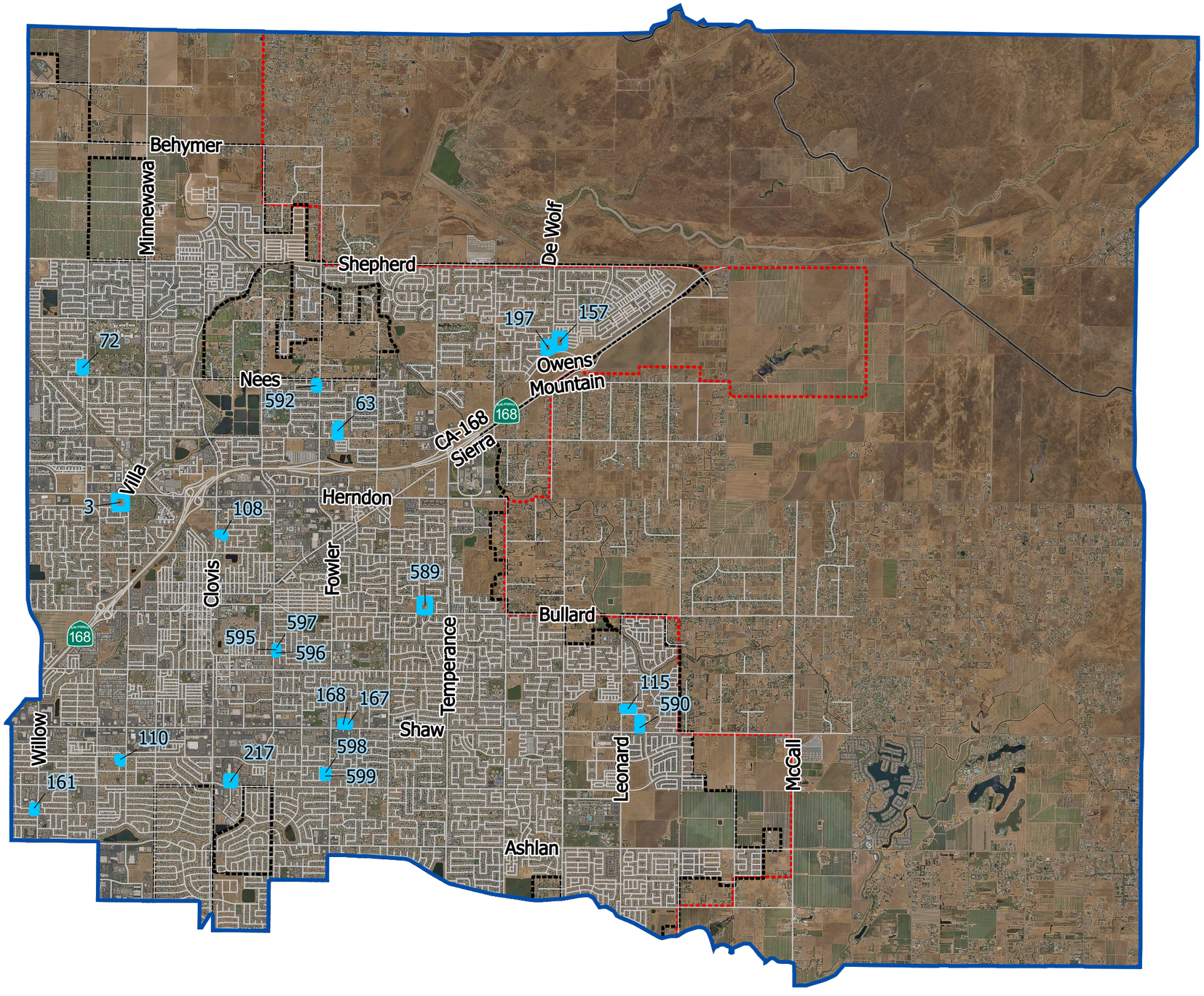
SITE 596

Site ID	Hospital (1 mile)	High School (1 mile)	Pharmacy (0.5 miles)	Existing Bus Stops (0.5 miles)	Future Bus Stops (0.5 miles)2	Park/Community Center (0.5 miles)	Library (0.5 miles)	Grocery (0.5 miles)	Medical Clinic (0.5 miles)	Middle School (0.5 miles)	Elementary School (0.5 miles)	Elementary School (0.25 miles)	Internet	TCAC/HCD Zone	Flood Zone	Water	Sewer
595	N	N	N	Y	Y	Y	Y	N	N	N	N	N	Y	Y	N	Y	Y



Infill Rezone Program Sites

April 23, 2026



Legend

- Streets
- City Limits
- Sphere of Influence
- Rezone Sites
- Planning Area Boundary

Notes:

- 1303 dwelling units proposed
- 1284 dwelling units required per court judgment

N
W E
S

0 0.5 1 2
Miles

Attachment 5

Site #3

November 7, 2025



Legend

Streets

Rezone Site

- 270 W Herndon Ave
- Assessor Parcel Number: 491-020-42
- Existing Land-Use Designation: General Commercial
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: P-C-C
- Proposed Zoning: R-3

N
W E
S

0 162.5 325 650

Feet

Site #63

November 7, 2025



Legend

Streets

Rezone Site

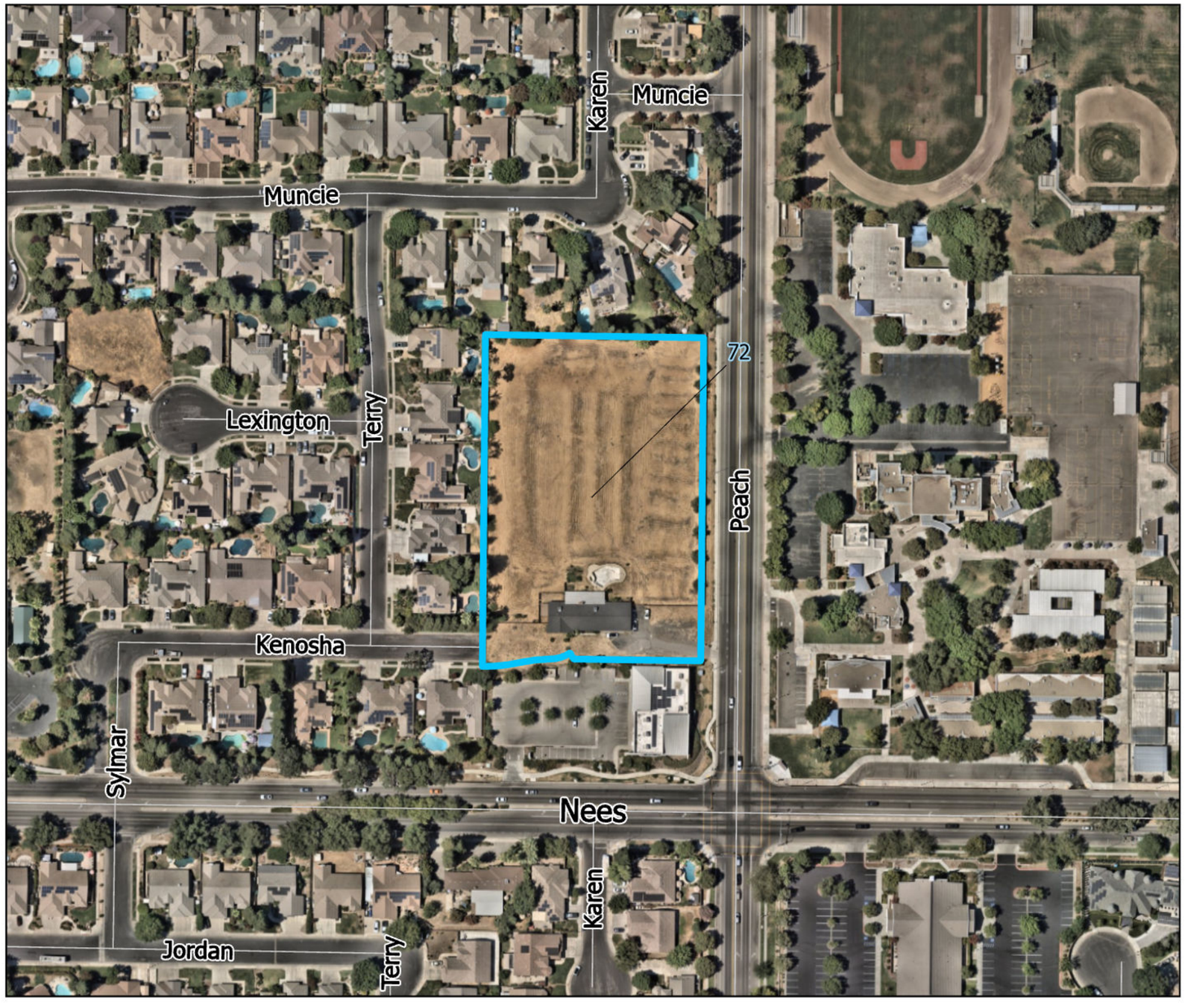
- 1933 Alluvial Ave
- Assessor Parcel Number: 563-032-07
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1-7500
- Proposed Zoning: R-3

N
W E
S

0 150 300 600
Feet

Site #72

November 7, 2025



Legend

- Streets
- Rezone Site

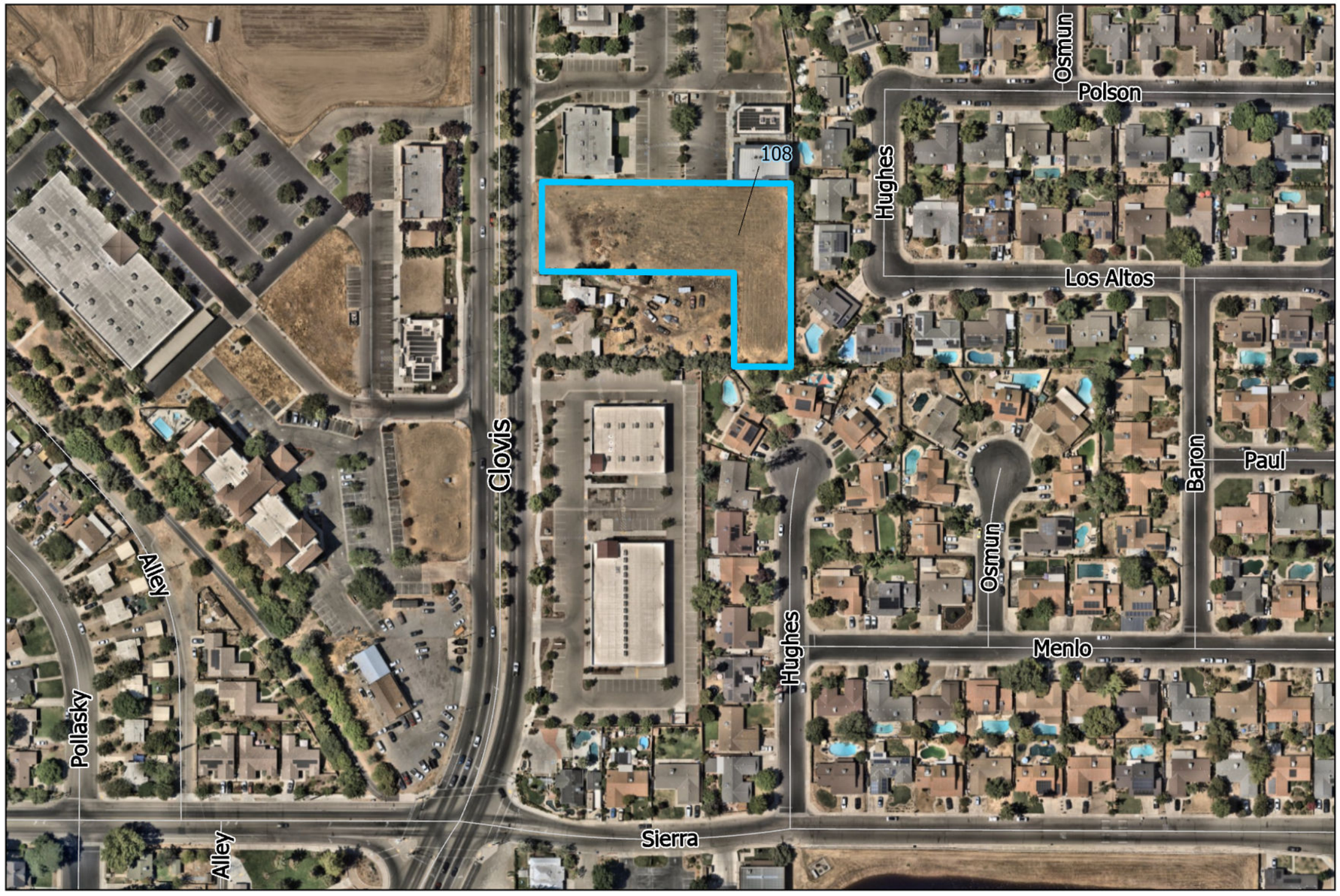
- 437 W Nees Ave
- Assessor Parcel Number: 560-082-07
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1-7500
- Proposed Zoning: R-3

N
W E
S

0 115 230 460
Feet

Site #108

November 7, 2025



Legend

- Streets
- Rezone Site

- 125 & 135 N Clovis Ave
- Assessor Parcel Number: 491-231-24
- Existing Land-Use Designation: General Commercial
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: C-2
- Proposed Zoning: R-3

0 100 200 400
Feet

Site #110

November 7, 2025



Legend

Streets

Rezone Site

- 236 & 256 W Santa Ana Ave
- Assessor Parcel Number: 499-060-74
- Existing Land-Use Designation: Medium Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-3

N
W E
S

0 80 160 320
Feet

Site #115

November 7, 2025



Legend

- Streets
- Rezone Site

- 1671 Leonard Ave
- Assessor Parcel Number: 554-570-44S
- Existing Land-Use Designation: Medium Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-3

CITY of CLOVIS CALIFORNIA

N W E S

0 120 240 480

Feet

Site #157

November 7, 2025



Legend

- Streets
- Rezone Site

- De Wolf Ave & Owens Mountain Pkwy
- Assessor Parcel Number: 558-033-59S
- Existing Land-Use Designation: Mixed Use Village
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: P-C-C
- Proposed Zoning: R-3

N
W E
S

0 195 390 780
Feet

Site #161

November 7, 2025



Legend

Streets

Rezone Site

- 2930 Willow Ave
- Assessor Parcel Number: 430-433-16
- Existing Land-Use Designation: Office
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: C-P
- Proposed Zoning: R-3

N
W E
S

0 90 180 360
Feet

Site #167

November 7, 2025



Legend

- Streets
- Rezone Site

- 1871 Shaw Ave
- Assessor Parcel Number: 551-280-04
- Existing Land-Use Designation: Office
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: C-P
- Proposed Zoning: R-3

N
W E
S

0 160 320 640
Feet

Site #168

November 7, 2025



Legend

Streets

Rezone Site

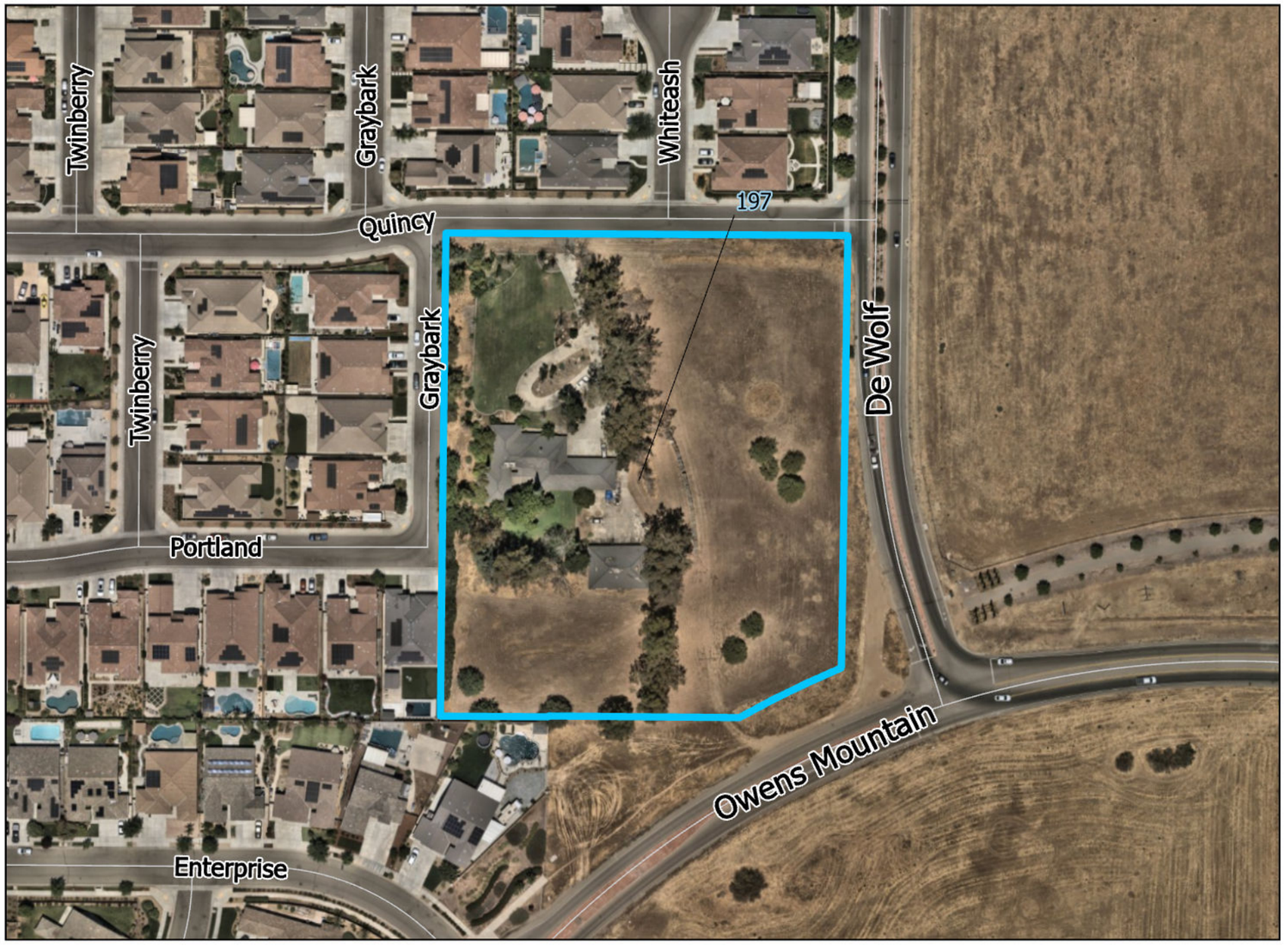
- 1853 Shaw Ave
- Assessor Parcel Number: 551-280-03
- Existing Land-Use Designation: Office
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: C-P
- Proposed Zoning: R-3

N
W E
S

0 0.02 0.04 0.08
Miles

Site #197

November 7, 2025



Legend

Streets

Rezone Site

- 1497 N Locan Ave
- Assessor Parcel Number: 558-492-30
- Existing Land-Use Designation: Very Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1-AH
- Proposed Zoning: R-3

N
W E
S

0 90 180 360
Feet

Site #217

November 7, 2025



Legend

Streets

Rezone Site

- 885 Gettysburg Ave
- Assessor Parcel Number: 499-540-13ST (Portion)
- Existing Land-Use Designation: Industrial
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: M-1
- Proposed Zoning: R-3

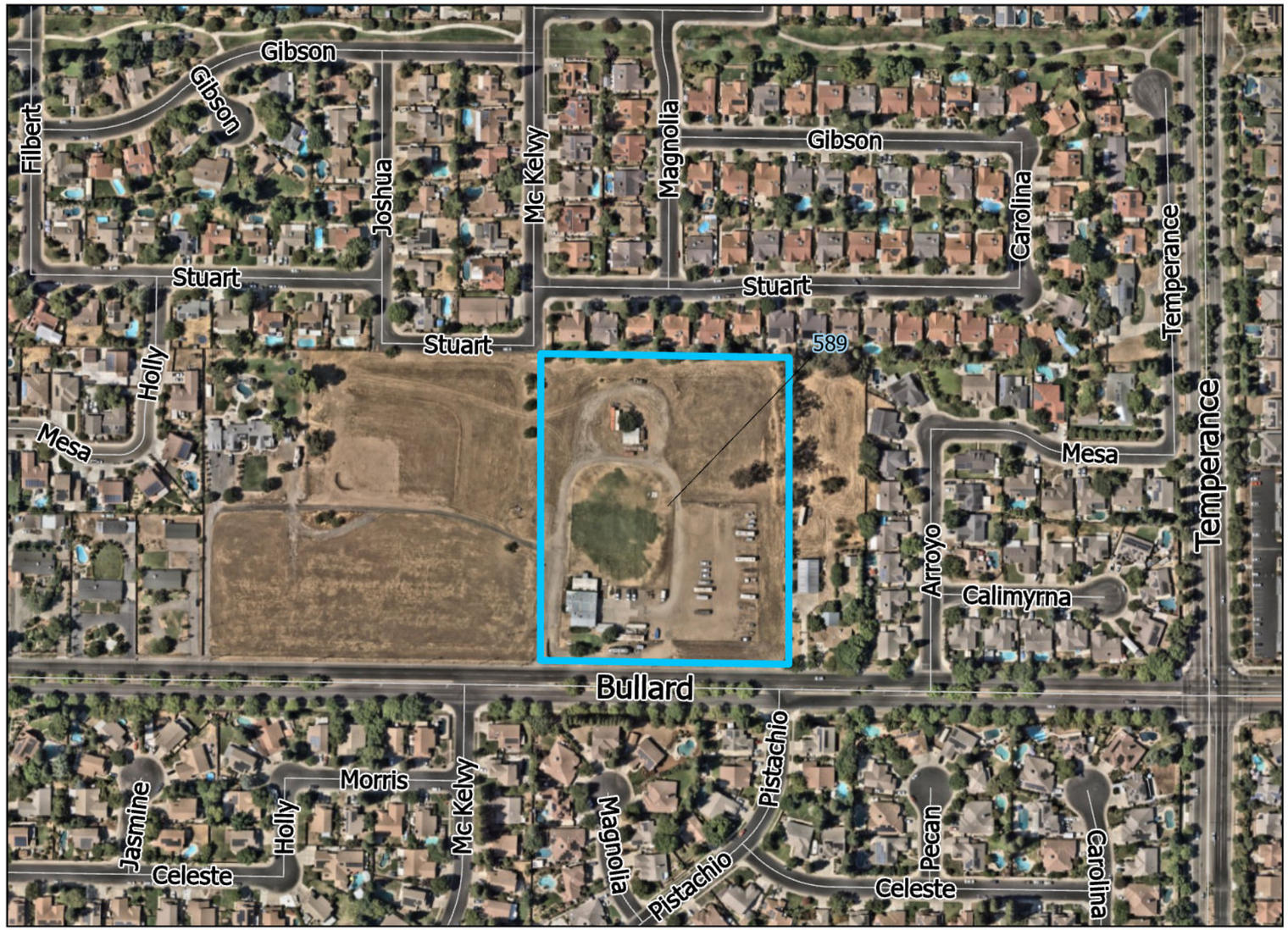
N
W E
S

0 0.03 0.06 0.12

Miles

Site #589

November 7, 2025



Legend

- Streets
- Rezone Site

- 2403 Bullard Ave
- Assessor Parcel Number: 550-260-23
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-A
- Proposed Zoning: R-3

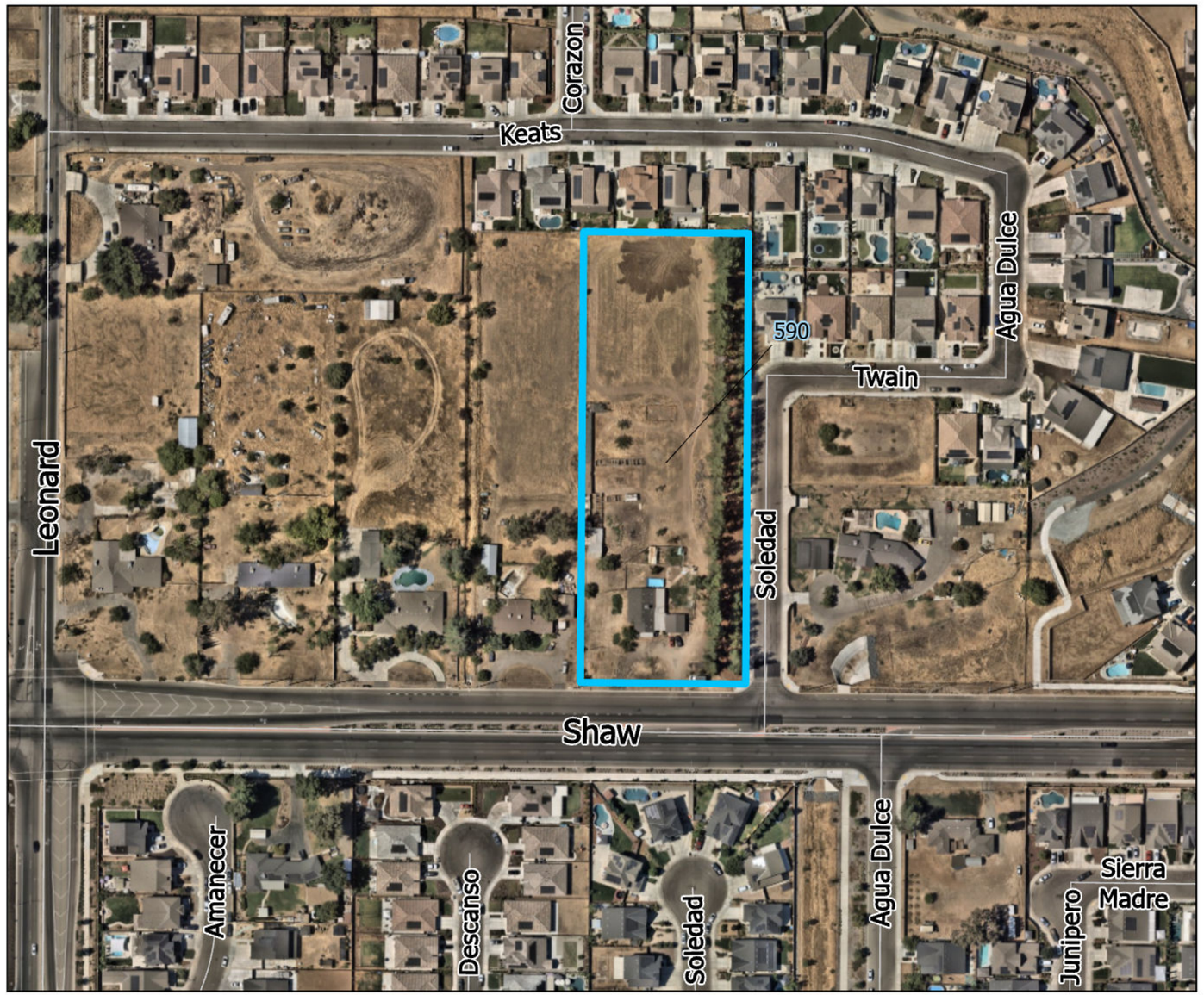
CITY of CLOVIS CALIFORNIA

N
W E
S

0 170 340 680
Feet

Site #590

November 7, 2025



Legend

- Streets
- Rezone Site

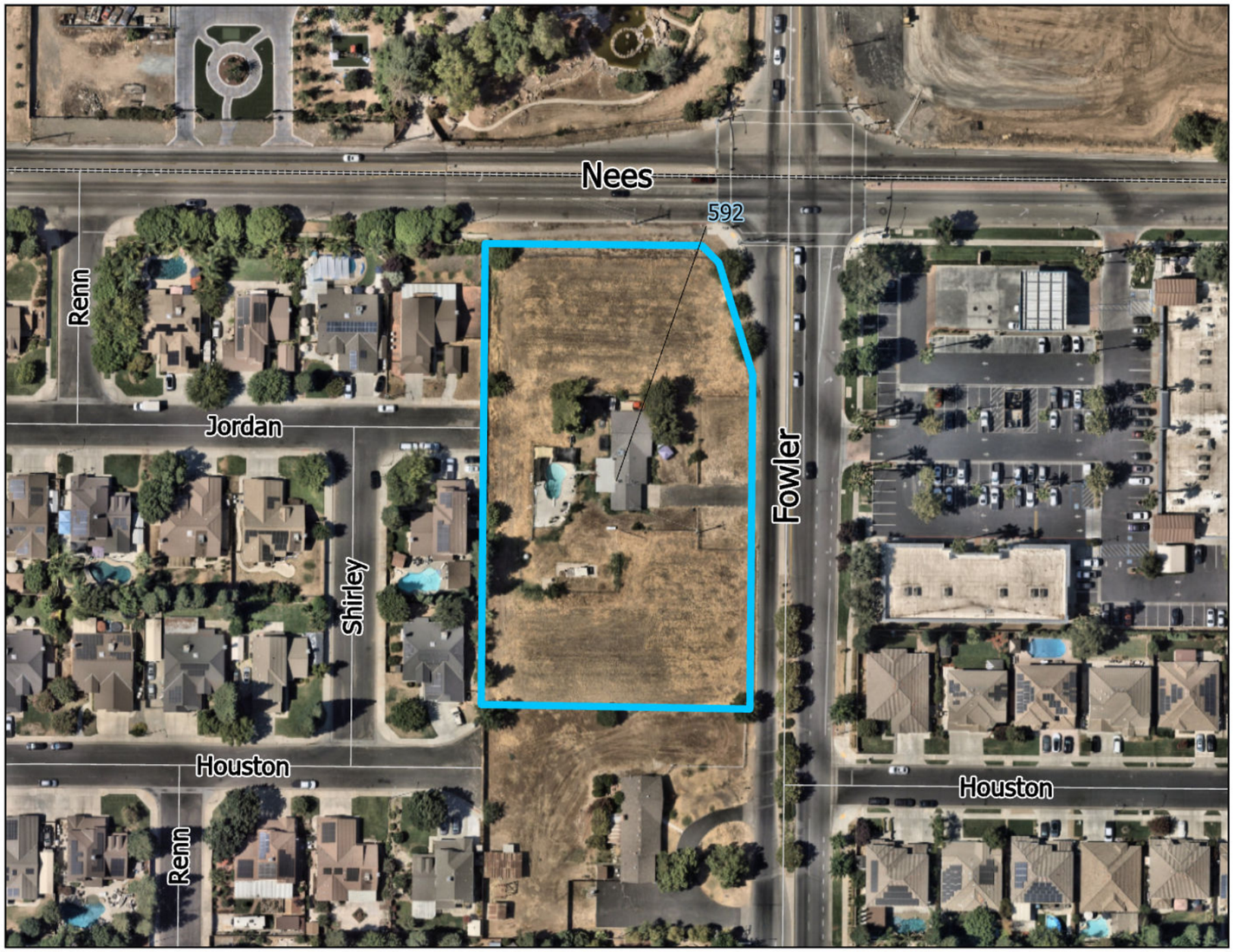
- 3959 Shaw Ave
- Assessor Parcel Number: 554-580-36S
- Existing Land-Use Designation: Medium Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-3

N
W E
S

0 120 240 480
Feet

Site #592

November 7, 2025



Legend

Streets

Rezone Site

- 1160 N Fowler Ave
- Assessor Parcel Number: 563-031-31
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-A
- Proposed Zoning: R-3

N
W E
S

0 75 150 300
Feet

Site #595

November 7, 2025



Legend

- Streets
- Rezone Site

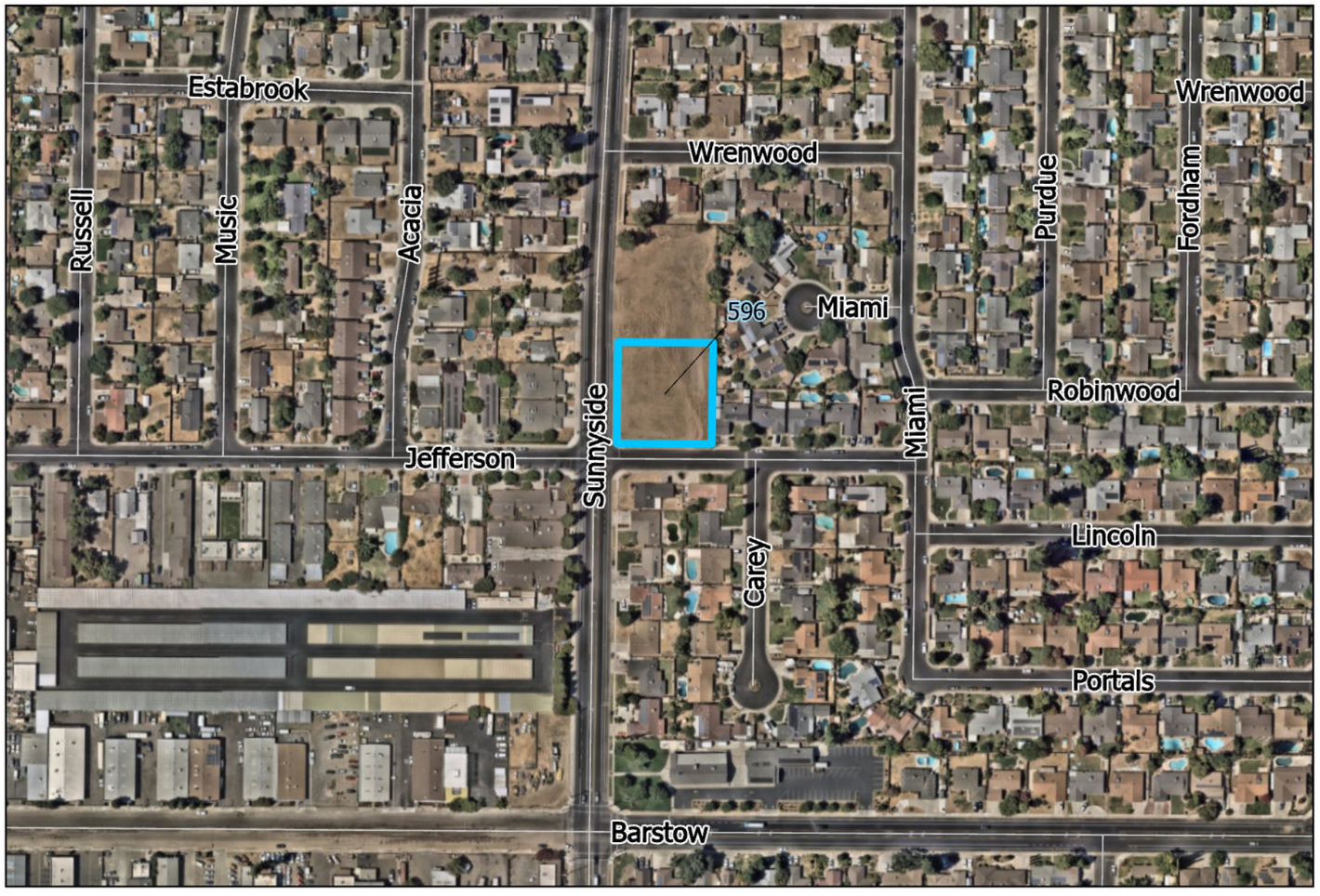
- 939 & 947 Sunnyside Ave
- Assessor Parcel Number: 498-172-02
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: Very High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-4

N
W E
S

0 120 240 480
Feet

Site #596

November 7, 2025



Legend

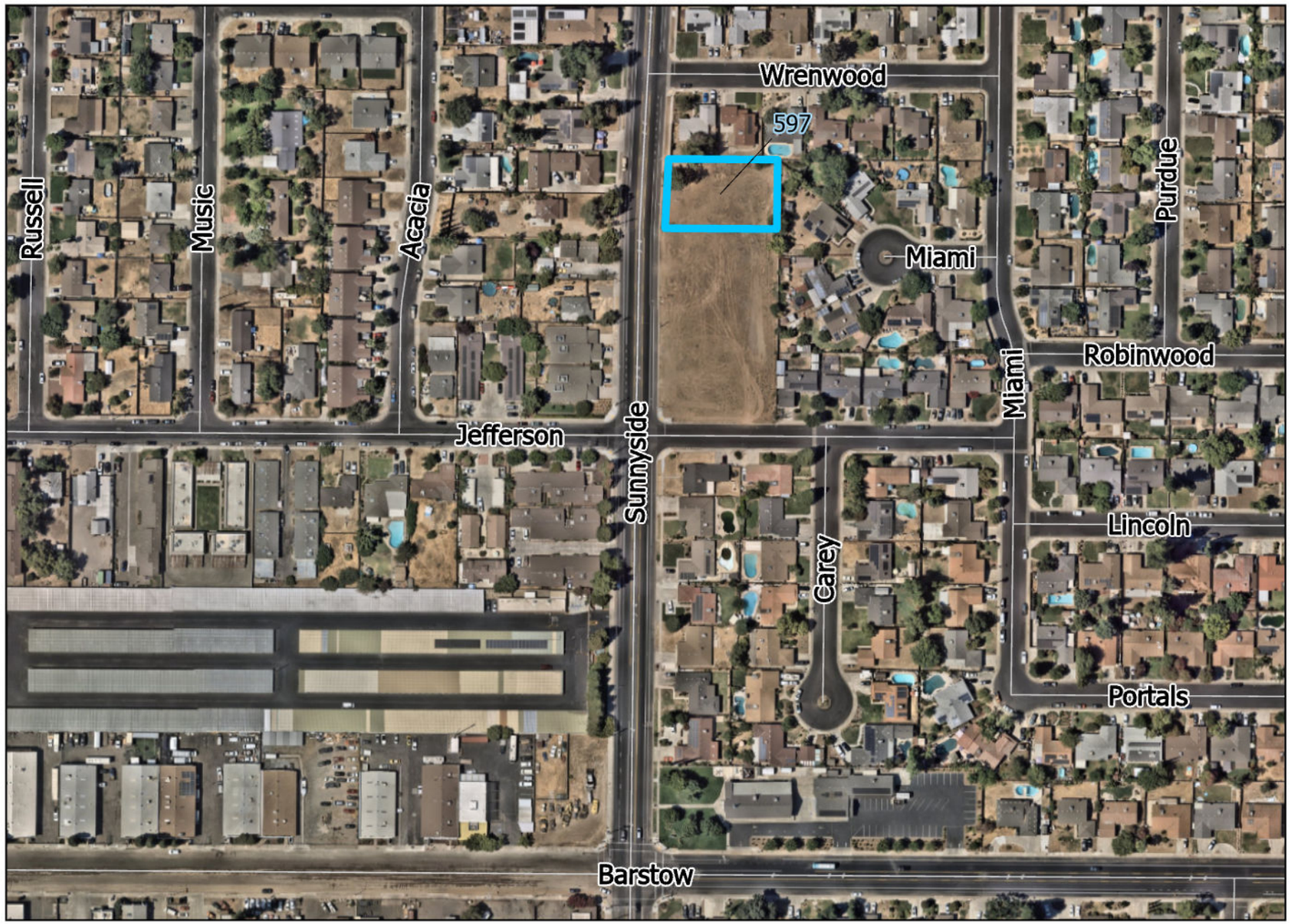
- Streets
- Rezone Site

- 965 & 975 Sunnyside Ave
- Assessor Parcel Number: 498-172-01
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: Very High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-4

0 170 340 680
Feet

Site #597

November 7, 2025



Legend

Streets

Rezone Site

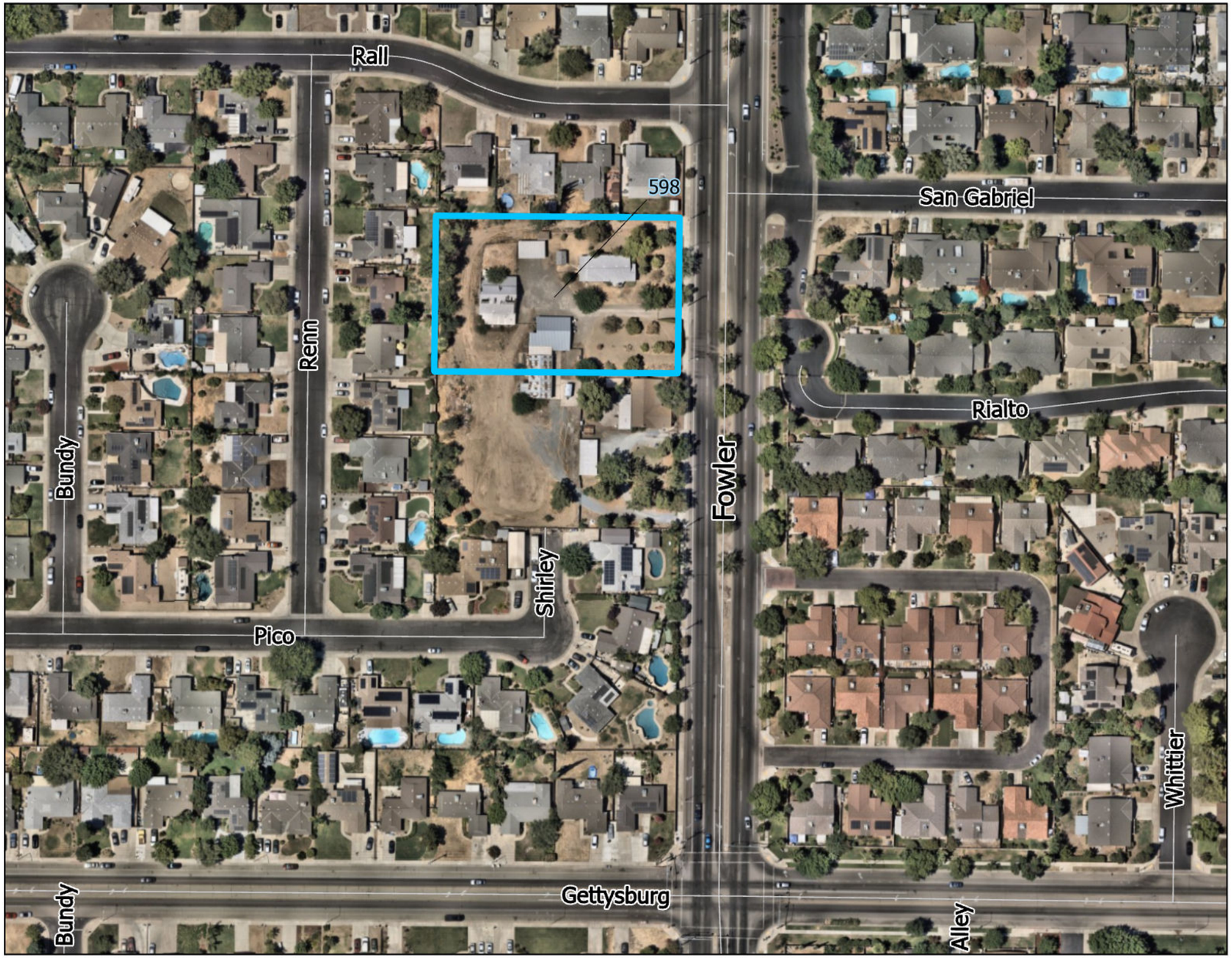
- 925 Sunnyside Ave
- Assessor Parcel Number: 498-172-03
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: Very High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-4

N
W E
S

0 140 280 560
Feet

Site #598

November 7, 2025



Legend

Streets

Rezone Site

- 2560 Fowler Ave
- Assessor Parcel Number: 499-384-42
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-3

N

W E

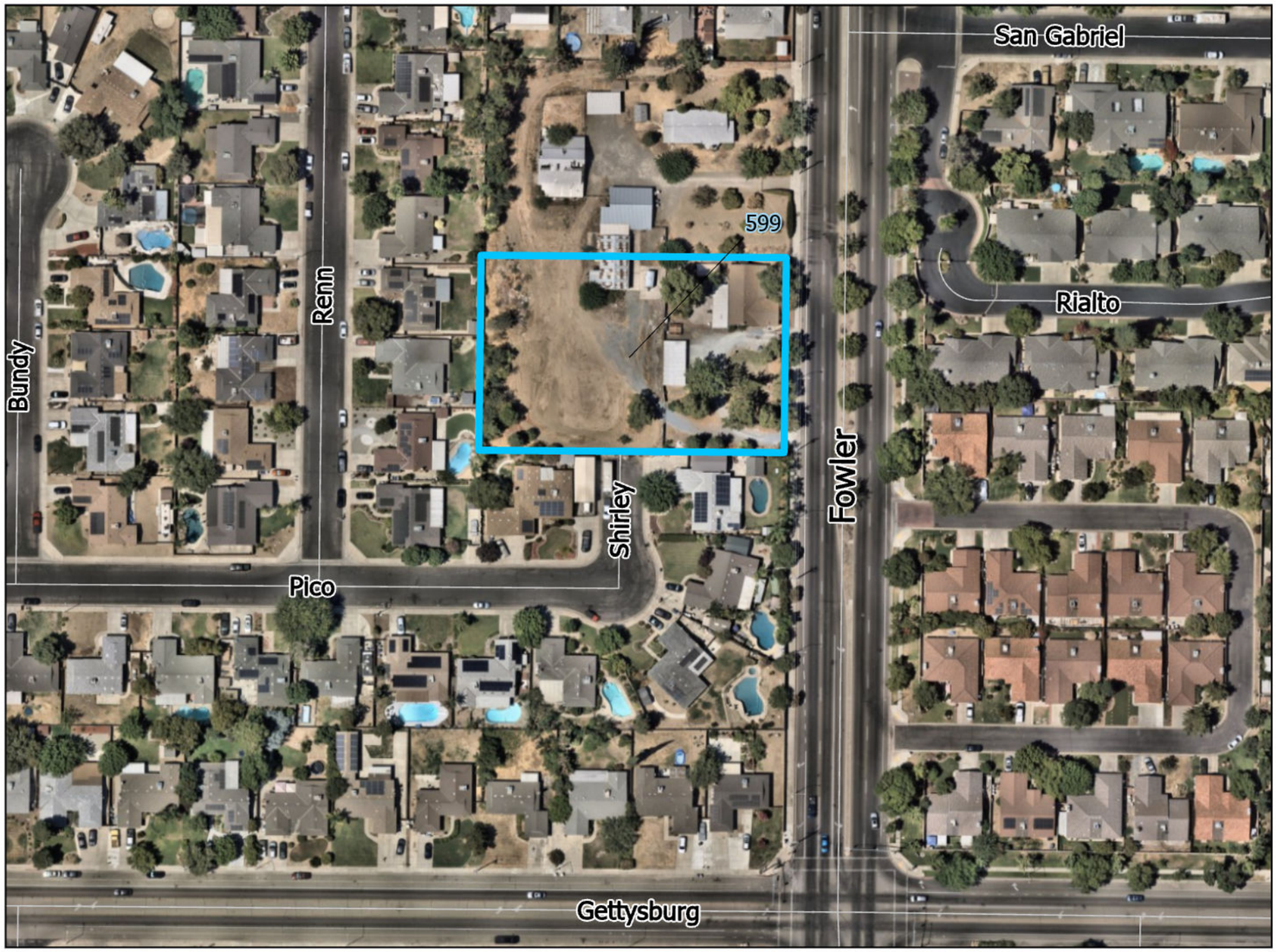
S

0 87.5 175 350

Feet

Site #599

November 7, 2025



Legend

- Streets
- Rezone Site

- 2612 Fowler Ave
- Assessor Parcel Number: 499-384-41
- Existing Land-Use Designation: Low Density Residential
- Proposed Land-Use Designation: High Density Residential
- Existing Zoning: R-1
- Proposed Zoning: R-3

N
W E
S

0 80 160 320
Feet

Infill Rezone Program
Site List

Site ID	APN	Address	Existing General Plan land use	Proposed General Plan land use	Existing Zoning	Proposed Zoning
3	49102042	270 W Herndon Ave	General Commercial	High Density Residential	P-C-C	R-3
63	56303207	1933 Alluvial Ave	Low Density Residential	High Density Residential	R-1-7500	R-3
72	56008207	437 W Nees Ave	Low Density Residential	High Density Residential	R-1-7500	R-3
108	49123124	125 & 135 N Clovis Ave	General Commercial	High Density Residential	C-2	R-3
110	49906074	236 & 256 W Santa Ana Ave	Medium Density Residential	High Density Residential	R-1	R-3
115	55457044S	1671 Leonard	Medium Density Residential	High Density Residential	R-1	R-3
157	55803359S	None	Mixed Use Village	High Density Residential	P-C-C	R-3
161	43043316	2930 Willow Ave	Office	High Density Residential	C-P	R-3
167	55128004	1871 Shaw Ave	Office	High Density Residential	C-P	R-3
168	55128003	1853 Shaw Ave	Office	High Density Residential	C-P	R-3
197	55849230	1497 N Locan Ave	Very Low Density Residential	High Density Residential	R-1-AH	R-3
217	49954013ST (portion)	885 Gettysburg Ave	Industrial	High Density Residential	M-1	R-3
589	55026023	2403 Bullard Ave	Low Density Residential	High Density Residential	R-A	R-3
590	55458036s	3959 Shaw Ave	Medium Density Residential	High Density Residential	R-1	R-3
592	56303131	1160 N Fowler Ave	Low Density Residential	High Density Residential	R-A	R-3
595	49817202	939 & 947 Sunnyside Ave	Low Density Residential	Very High Density Residential	R-1	R-4
596	49817201	965 & 975 Sunnyside Ave	Low Density Residential	Very High Density Residential	R-1	R-4
597	49817203	925 Sunnyside	Low Density Residential	Very High Density Residential	R-1	R-4
598	49938442	2560 Fowler Ave	Low Density Residential	High Density Residential	R-1	R-3
599	49938441	2612 Fowler Ave	Low Density Residential	High Density Residential	R-1	R-3

DIRK POESCHEL
Land Development Services, Inc.
923 Van Ness Avenue, Suite 200 • Fresno, California 93721
559/445-0374 • Fax: 559/445-0551 • email: dirk@dplds.com

September 15, 2025

Ms. McKencie Perez
Deputy City Planner
City of Clovis - Planning & Development Services
1033 Fifth St.
Clovis, CA 93612
mckenciep@clovisca.gov

SUBEJCT: Request for Removal from the Infill Rezone Program

Dear Ms. Perez:

On behalf of my client, Dr. Jaswant Basraon, we respectfully request that the property located at 1933 Alluvial Ave. (APN: 563-032-07) be removed from participation in the City of Clovis Infill Rezone Program. My client has carefully reviewed the program objectives and requirements and, after further consideration, has decided not to move forward at this time.

My client has carefully evaluated multiple approaches for developing a multifamily project that complements the RHNA-overlay property he owns to the west. However, without a means to blend densities, it is not feasible to produce a project that would be acceptable to the community and likely not the market.

We apologize for any inconvenience this change may cause to city staff or the ongoing planning process. We appreciate the city's efforts and the time already dedicated to this project.

Thank you and if you have any questions, please feel free to contact me.

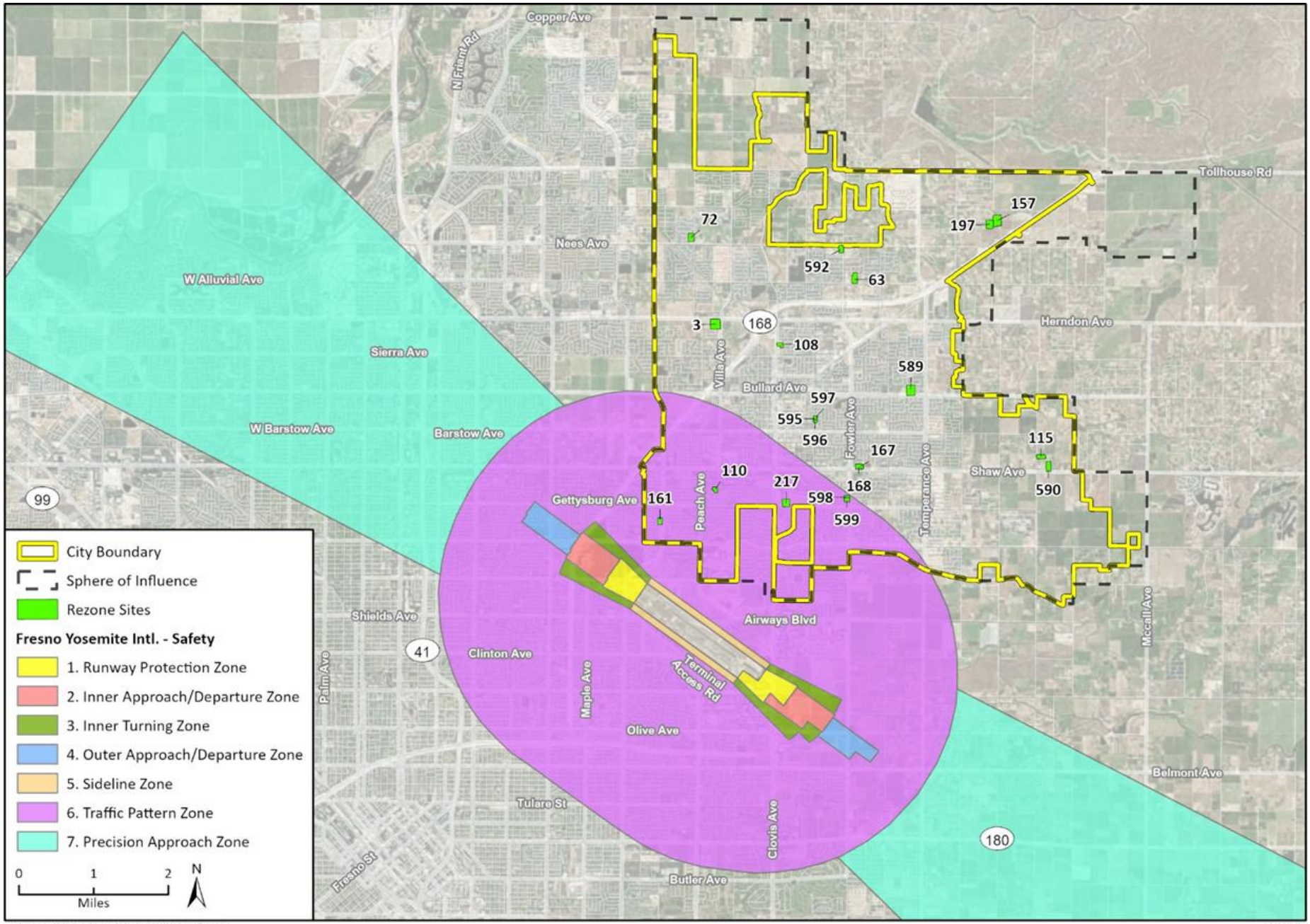
Sincerely,

Dirk Poeschel, AICP

cc: Dr. Jaswant Basraon

https://dplds.sharepoint.com/shared documents/current clients/basraon, jas 23-29/correspondence/removal from irp.docx

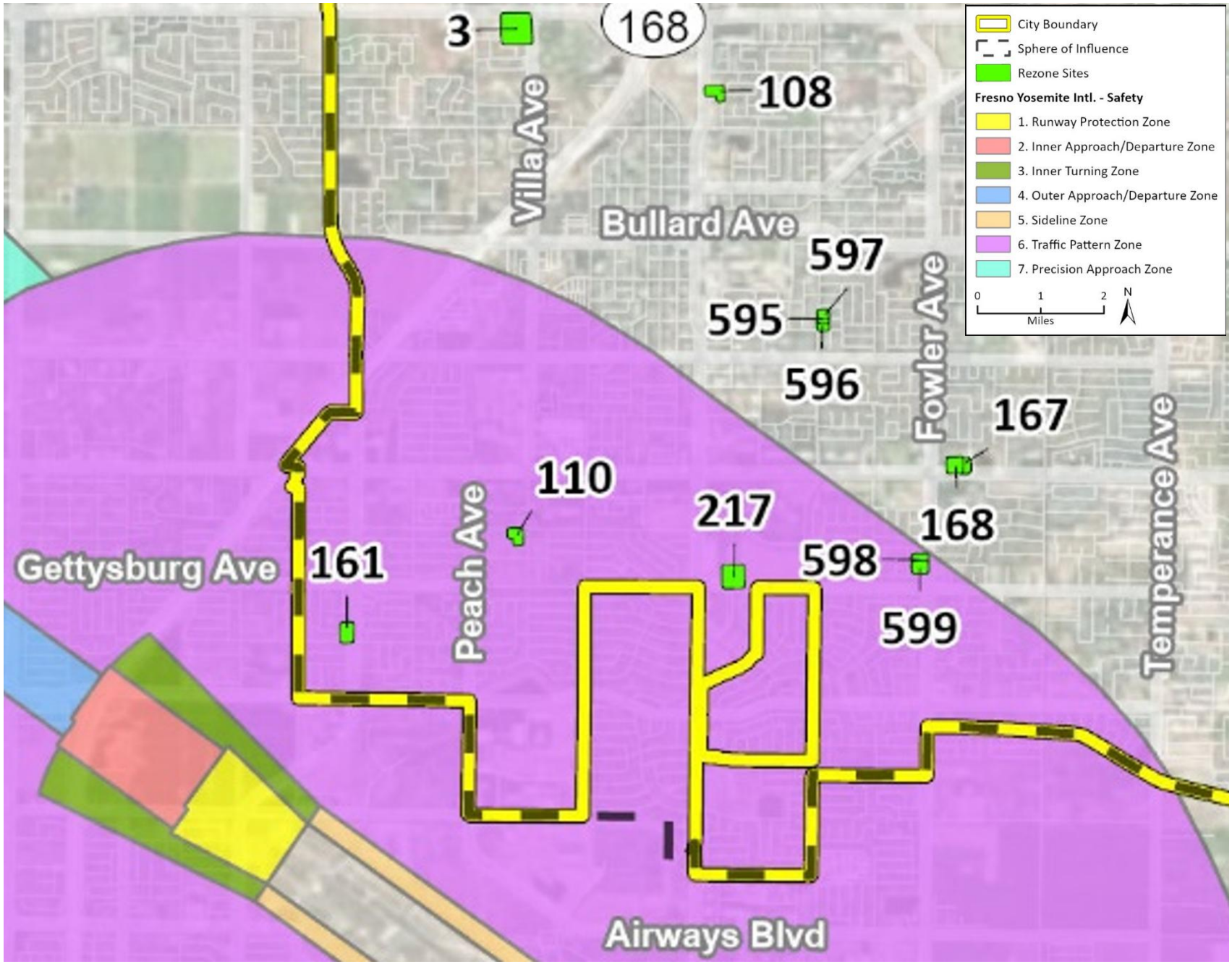
Airport Safety Compatibility Zones



Imagery provided by Microsoft Bing and its licensors © 2025.
Fresno Yosemite International Airport Authority, 2025.

Attachment 8

Airport Safety Compatibility Zones



April 7, 2026

McKencie Perez
Deputy City Planner
City of Clovis - Planning & Development Services
1033 Fifth Street | Clovis, CA 93612

SUBJECT: ALUC Consistency Determination Result for the City of Clovis Infill Rezone Program

Dear Ms. Perez,

This letter confirms that at the April 6, 2026, Fresno County Airport Land Use Commission meeting, the Commission approved a Finding of Consistency for the City of Clovis Infill Rezone Program with the Airport Land Use Compatibility Plan (ALUCP).

The project site is located within Zone 6, Traffic Pattern Zone (TPZ), of Fresno Yosemite International Airport. Within this zone, residential uses are permitted, provided development complies with applicable ALUCP safety, height, and airspace protection criteria.

Future development proposals for the approved sites are subject to review by the Fresno County Airport Land Use Commission prior to construction.

While no physical development is proposed at this time, future development within the Airport Influence Area will be subject to the following applicable standards and requirements:

Development Considerations:

- Development must comply with all applicable ALUCP safety, height, and airspace protection standards, including the requirement for an Airport Disclosure Notice
- Structures exceeding 100 feet in height will require additional airspace review and FAA notification
- New structures are prohibited on terrain that penetrates 14 CFR Part 77 surfaces and may require additional airspace analysis within the 50-foot terrain penetration buffer
- Final development plans shall be subject to review by the Fresno County Airport Land Use Commission prior to construction

Prohibited Uses:

- Uses that would introduce hazards to flight, including physical, visual, or electronic interference with aircraft operations
- Outdoor stadiums and other high-intensity uses
- Land uses that may attract hazardous wildlife, such as certain agricultural uses identified in FAA guidance

Please do not hesitate to contact me with any questions.

Rachel Hellett

Rachel Hellett
Staff, Fresno County Airport Land Use Commission
Associate Regional Planner
Fresno Council of Governments
2035 Tulare Street, Suite 201, Fresno, CA 93721

McKencie Perez

From: [redacted]
Sent: Thursday, November 20, 2025 1:02 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

Follow Up Flag: Follow up
Flag Status: Flagged

text-1755209425252 = Mel Hill
text-1755209464120 =
text-1755209498255 = [redacted] Stuart Avenue
textarea-1755209560293 = Will parcel 589 located on Bullard Avenue be designated as R-3 or R-4 for zoning purposes?
Parcel 589 - R-3 or R-4?
If zoned R-3, could this include multi-story buildings whether condos or apartments?
Client IP = 97.214.25.20

McKencie Perez

From: [redacted]
Sent: Thursday, November 20, 2025 7:46 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Joe Guerrero
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Stuart Ave
textarea-1755209560293 = Dear McKenzie Perez, MPA,

I am submitting this comment to formally and strongly oppose the inclusion of Site 589 in the Infill Rezone Program. I live directly adjacent to this parcel, and I want to express in the clearest possible terms that I do not support any level of development on Site 589 — not three stories, not two stories, not one story, and not any multi-family structure of any height or density.

Site 589 should be entirely removed from the list of identified rezone parcels.

My opposition is based on several significant and unavoidable impacts:

1. Site 589 is completely incompatible with the surrounding established neighborhood.

This is a long-standing, stable, single-family residential area with no apartments or multi-family units anywhere nearby.
Introducing a multi-family complex—of any height—is fundamentally inconsistent with the existing zoning pattern and would permanently disrupt the neighborhood's established identity, stability, and cohesion.

2. Any structure on Site 589 would create severe privacy violations.

Because the parcel sits directly behind our homes, any development would place dozens of windows, balconies, and pedestrian areas overlooking private backyards, bedrooms, and family spaces.

This is not a situation where minor mitigations are possible — the location makes privacy impacts impossible to avoid or lessen, regardless of the building height.

3. The location of Site 589 poses serious traffic, congestion, and safety concerns.

Our local streets were not designed for increased vehicle load or multi-family traffic. A development here would increase:

street parking overflow,

traffic near children walking and biking,

noise disturbances,

emergency access strain, and

overall congestion through narrow neighborhood streets.

This creates significant safety risks for families who rely on low-traffic residential roadways.

4. Schools and infrastructure cannot absorb additional density here.

Clovis Unified schools in this area are already heavily impacted. Additional units—whether high density or "moderate"—would strain classrooms, traffic flow, utilities, park space, and emergency services.

There is no viable way to mitigate these impacts at this location.

5. High-density redevelopment of Site 589 is unnecessary given better alternatives.

There are multiple parcels in Clovis already positioned for multi-family development—near commercial corridors, major arterials, and existing apartment zones.
Site 589 is surrounded on all sides by single-family homes and is one of the least appropriate locations in the city for multi-family rezoning.

Removing Site 589 will not prevent the City from meeting its state housing requirements.

6. Property values would be negatively impacted.

The placement of apartments immediately behind existing homes would devalue surrounding properties and undermine long-term investments made by families who purchased here under the expectation of consistent land use.

7. This parcel provides natural buffering and neighborhood continuity.

Currently, Site 589 acts as an important open-space buffer between properties. Developing it would permanently remove this buffer, crowd existing housing, reduce open sightlines, and diminish environmental quality (airflow, noise, light, and nighttime safety).

My Official Request

I respectfully but firmly request that the City:

REMOVE Site 589 entirely from the proposed rezoning list.
Not downsize it.
Not lower the building height.
Not redesign the proposal.
Remove it completely from consideration.

This parcel is simply not suitable—logistically, environmentally, or structurally—for any multi-family residential development.

Thank you for reviewing my comments and considering the very serious impacts this proposal would have on residents directly adjacent to Site 589.

Respectfully,
Joe Guerrero
Client IP = 76.20.72.170

McKencie Perez

From: noreply@revize.com
Sent: Thursday, November 20, 2025 7:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Jose Guerrero
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Stuart Ave
textarea-1755209560293 = Dear McKenzie Perez, MPA,

I am submitting this comment to formally and strongly oppose the inclusion of Site 589 in the Infill Rezone Program. I live directly adjacent to this parcel, and I want to express in the clearest possible terms that I do not support any level of development on Site 589 — not three stories, not two stories, not one story, and not any multi-family structure of any height or density.

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---

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---

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street parking overflow,

traffic near children walking and biking,

noise disturbances,

emergency access strain, and

overall congestion through narrow neighborhood streets.

This creates significant safety risks for families who rely on low-traffic residential roadways.

---

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Clovis Unified schools in this area are already heavily impacted. Additional units—whether high density or "moderate"—would strain classrooms, traffic flow, utilities, park space, and emergency services.

There is no viable way to mitigate these impacts at this location.

---

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Removing Site 589 will not prevent the City from meeting its state housing requirements.

---

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---

7. This parcel provides natural buffering and neighborhood continuity.

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Not downsize it.
Not lower the building height.
Not redesign the proposal.
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This parcel is simply not suitable—logistically, environmentally, or structurally—for any multi-family residential development.

Thank you for reviewing my comments and considering the very serious impacts this proposal would have on residents directly adjacent to Site 589.

Respectfully,
Your Name
Client IP = 76.20.72.170

McKencie Perez

From: Michael Peloquin <[redacted]>
Sent: Friday, November 21, 2025 11:58 AM
To: McKencie Perez
Cc: Adrian Cruz
Subject: Infill Rezone Program: Question

I recently received a notice regarding the above-referenced program. I reside at 3943 Keats Ave, which is adjacent to parcels 115 and 590 that are proposed for rezoning from R1 to R3.

I would like to inquire whether the City has already determined the type of housing intended for these parcels if the rezoning is approved. For example, are these parcels being considered for Section 8 or other affordable housing developments? Alternatively, is the plan to construct condominiums, townhomes, or similar residential units?

My understanding is that R1 zoning allows for approximately 10 units per acre, whereas R3 allows for approximately 20 units per acre. While the rezoning itself is not my primary concern, I am seeking clarification regarding whether the nearby parcels may be designated for low-income housing, as such a designation could potentially affect property values within the surrounding area.

Thank you for your time and consideration of this inquiry.

Best regards,
Michael Peloquin
Property Owner
[redacted] Keats Ave
Clovis, CA 93619

CC: Adrian Cruz

Co-Property Owner

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 21, 2025 2:01 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Doanh Tran
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Celeste Ave , Clovis CA93611
textarea-1755209560293 = I'm concerned if city will build apartments complex or low income housing units near my neighborhood because there will be more people and more cars in the area and that's not safe.
Client IP = 73.158.28.36

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 21, 2025 8:54 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Jesus Mercado
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Gibson Ave
textarea-1755209560293 = This is a great first step for the city and they should move forward approving all the 20 parcels to R3 or R4 zone districts. More dense housing will only help our city in the long run and I believe we should also allow more mixed use development on the east side of Clovis by Temperance to allow for more shops and continued cash flow to the City. This along with our expanded bus routes will truly create a city that thrives for the future.
Client IP = 93.152.210.169

McKencie Perez

From: nadine pourier blumenshine <[redacted]>
Sent: Saturday, November 22, 2025 2:04 PM
To: McKencie Perez
Subject: Infill Rezone Program

Hello,
I am unable to make the December 2 public meeting and want to provide comment.

I support the City of Clovis' efforts to create opportunities for affordable housing. I understand that some parcels will need to be re-zoned, and I agree with the re-zoning in order to provide parcels that will accommodate multi-family, affordable housing. I am happy that Clovis has been put in the position of providing opportunity for affordable housing for those of us who can't afford the expensive costs associated with renting or owning a home in Clovis, and look forward to my neighborhood welcoming more residents.

Please continue to keep Clovis residents informed.

Sincerely,
Nadine Pourier Blumenshine
[redacted] Bliss Ave.

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, November 26, 2025 4:32 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kristina L. Palmer
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Laverne Ave
textarea-1755209560293 = My husband and I bought our home June 1994. This lot at Shaw and Laverne has been empty and zoned for businesses. My concern is the impact to the schools, Jefferson, Clark, and Clovis High. My next concern is green space for families who live in this kind of housing. My other concern is increased traffic onto Laverne cul de sac. Increased traffic on Shaw. Since over build out at Loma Vista and Clovis East area Shaw is very congested and hard to merge either direction. I think this area needs to have 8am-5pm offices built. Housing with such huge population in such a small space will drastically impact the Clovis way of life. I plan to be a voice at all future meetings regarding this proposal. I was the main concerned neighbor who contacted Planning dept when the builder and land owner tried to have a meeting at Jefferson to pitch their proposal to the neighbors in 2019? My hope is that you survey the roads, schools, and impact to Clovis way of Life before making a decision. The final frustration is also crime and my property values lowering because of such an impactful proposal.
Client IP = 12.222.26.251

McKencie Perez

From: noreply@revize.com
Sent: Thursday, November 27, 2025 6:29 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Patricia Carreon
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] W Swift Ave 93612
textarea-1755209560293 = My daughter who lives with me would be interested in getting on a qualification list. Are you able to provide that information?
Client IP = 76.20.90.52

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 28, 2025 2:20 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Nancy Vogt
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Quincy Ave.
textarea-1755209560293 = Rezoning the parcel on DeWolf and Owens Mountain Road to allow multi-family, high density apartments to be built would strain streets and roads adjacent to the property beyond their limits, and already very high current usage, affecting the public safety.
Client IP = 97.136.172.230

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 28, 2025 3:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Pavlo Gurnyak
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Browning Ave Clovis CA 93611
textarea-1755209560293 = Low cost housing will bring more crimes to our city. Please do not destroy Old Town Clovis living - do not use parcels 108, 595, 596, 597.
Client IP = 73.192.166.57

McKencie Perez

From: Ryan Avedisian <[redacted]>
Sent: Wednesday, December 17, 2025 5:48 PM
To: McKencie Perez
Subject: Re: Planning Infill Rezone Program Form - contact us
Attachments: Image.jpeg

4:15 pm . Backed up clear to 168 . Owens parkway

Ryan Avedisian

[redacted]

Advantage Pools & Service

CSLB:199445

From: McKencie Perez <mckenciep@clovisca.gov>
Sent: Tuesday, December 2, 2025 1:14:07 PM
To: Ryan Avedisian <[redacted]>
Subject: RE: Planning Infill Rezone Program Form - contact us

Ryan – It is only related to density.

McKencie Perez
Deputy City Planner | MPA
Office: 559-324-2310
mckenciep@clovisca.gov

From: Ryan Avedisian <[redacted]>
Sent: Tuesday, December 2, 2025 9:50 AM
To: McKencie Perez <mckenciep@clovisca.gov>
Subject: Re: Planning Infill Rezone Program Form - contact us

Under the affordability talk will that include section 8 housing

Ryan Avedisian

[redacted]

Advantage Pools & Service

CSLB:199445

From: McKencie Perez <mckenciep@clovisca.gov>
Sent: Tuesday, December 2, 2025 11:36:18 AM
To: Ryan Avedisian [redacted]
Subject: RE: Planning Infill Rezone Program Form - contact us

Good morning,

Your comments have been received and will be considered by the Planning Commission and City Council.

There is no development proposed as part of this project; therefore, pricing is not available. For this project, the density is considered for affordability. If you have any questions, please feel free to give me a call.

Thank you,

McKencie Perez
Deputy City Planner | MPA
Office: 559-324-2310
mckenciep@clovisca.gov

From: noreply@revize.com <noreply@revize.com>
Sent: Friday, November 28, 2025 7:04 PM
To: McKencie Perez <mckenciep@clovisca.gov>
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ryan Avedisian
text-1755209464120 = [redacted]
text-1755209498255 = 1363 N. Twinberry Ave clovis Ca 93619
textarea-1755209560293 = What is criteria for affordable housing . Price points, density of homes or apartments ?
Client IP = 73.90.12.255
This e-mail may contain confidential and privileged material for the sole use of the intended recipient. Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply e-mail and delete all copies of this message.



McKencie Perez

From: noreply@revize.com
Sent: Friday, November 28, 2025 7:33 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us
Attachments: image.jpg

text-1755209425252 = Brad dennis
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Bedford ave Clovis 93611
textarea-1755209560293 = Wonder what this notice is about. What type of housing is this?
Client IP = 67.181.15.73

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 28, 2025 8:02 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Michael Murphy
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Fairmont Ave.
textarea-1755209560293 = Your message states property within 800 ft of our property maybe influenced by the proposed changes.. What property is 800 ft away? I don't see how we are impacted by the rezoning for now.
Client IP = 146.75.154.147

McKencie Perez

From: noreply@revize.com
Sent: Friday, November 28, 2025 9:20 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Terry Young
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] W Magill Ave
textarea-1755209560293 = I am concerned about the Villa and Herndon location. We have multiple traffic accidents at that location and it is already highly impacted by traffic. We were told the Nissan dealership ship would not affect us. We now have up to 30 vehicles parking in front of our homes. There is also two hotels approved on Magill. Peach and Villa are pathways for school age children with no sidewalks and the roads are both unsafe for them.
Client IP = 73.2.97.5

McKencie Perez

From: [redacted]
Sent: Friday, November 28, 2025 11:13 PM
To: McKencie Perez
Subject: Clovis Rezoning program

Hello McKencie,

My name is Jennie Daly and I am a resident of Harlan Ranch, I saw the notice of the infill rezone program regarding “high and/or very high density” affordable housing. I along with my neighbors are curious as to what exactly that means. Does this mean apartments? Does this mean section 8? Being that we are home owners in one of the highly esteemed and well kept neighborhoods in Clovis, we would hope that the City of Clovis would try to maintain the value of our community and make sure that any rezoning project would take that into account. Furthermore, how would this affect the population capacity of Bud Rank Elementary? Also, although inclusion is always welcome, we hope that this change in affordability does not allow people (that may potentially have different standards) to create unwanted behavior in the neighborhood.

I look forward to your response.

Thank you for your time,
Jennie Daly

McKencie Perez

From: noreply@revize.com
Sent: Saturday, November 29, 2025 9:48 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Merriam Osmondson
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Carey Ave Clovis, CA 93611
textarea-1755209560293 = When was the notice for the Infill Rezone program distributed?! My neighborhood near sunnyside & Jefferson is on the list and would be unable to accommodate the increase in traffic! High density?! What does that mean? This area would be more appropriate for a cottage type senior housing neighborhood.
Client IP = 67.172.162.115

McKencie Perez

From: noreply@revize.com
Sent: Saturday, November 29, 2025 6:24 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Matthew Silva
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Serena Avenue Clovis 93619
textarea-1755209560293 = To Whom It May Concern,

I am writing to express my firm and uncompromising opposition to the proposed rezoning of the remaining vacant parcels in our neighborhood to high-density apartment housing (sites 157/197 Harlan Ranch). This proposal represents a complete reversal of the development vision that was presented when this community was established, and it threatens to dismantle the safety, stability, and quality of life that residents have spent decades building and protecting.

When this neighborhood was developed, the vacant parcels were clearly promoted as future commercial sites intended for community-enhancing businesses such as cafés, restaurants, and small local shops. These assurances were not a minor detail—they were a central selling point and a key factor in the decision many of us made to invest our savings and our families' futures into this community. Any move to disregard those long-standing representations is not just disappointing—it is a profound breach of trust.

The consequences of forcing high-density housing into an area never designed for it are serious, predictable, and unacceptable:
• Public safety will be compromised. Concentrated population increases without appropriate infrastructure strain emergency services, heighten disturbances, and threaten the low-crime environment residents have worked hard to maintain.
• Property values will suffer. Homeowners invested under a clearly communicated land-use plan. Undermining that plan destabilizes financial security, erodes long-term equity, and disregards the commitments made to existing residents.
• Schools will be overloaded. Our elementary school is already operating near its limits. Adding a substantial influx of students will stretch resources past their breaking point and degrade educational quality for everyone.
• Quality of life will decline permanently. Increased traffic, congestion, noise, and disruption will fundamentally alter the character of the neighborhood. Once lost, the cohesive and peaceful community atmosphere cannot simply be restored.

Given these impacts, it is imperative that the City conduct a serious and impartial assessment of alternative locations that are appropriately equipped to handle high-density or affordable housing. Areas with stronger infrastructure, existing multi-family development, transit access, and compatible land-use patterns are far more suitable. Sound planning—not expedience—must guide decisions of this magnitude.

Residents of this community have upheld their end of the bargain. We invested heavily, maintained our properties, and built a stable and safe environment. We now expect the City to honor the commitments

made during development and to protect the integrity, security, and future of this neighborhood.

I strongly urge that this rezoning proposal be reconsidered in full. The long-term consequences for the community are too great to ignore.

Sincerely,

Matthew Silva

Harlan Ranch and long time Clovis resident
Client IP = 73.2.120.72

McKencie Perez

From: noreply@revize.com
Sent: Saturday, November 29, 2025 8:50 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Helena Silva
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Serena Avenue, Clovis, CA 93619
textarea-1755209560293 = I am writing as a homeowner and resident of the Harlan Ranch community to express my strong concern regarding the proposed rezoning of the parcel located at Owens Mountain Parkway and DeWolf Avenue from commercial use to high-density residential.

When many of us purchased our homes, we did so with the understanding—based on city planning documents, community discussions, and representations made by the builder/developer—that this parcel was designated for a small neighborhood shopping center. This planned commercial space was a key factor in our decision to invest in this community, as it was intended to provide walkable amenities and support the neighborhood's overall design.

The sudden proposal to shift this parcel to high-density housing represents a significant departure from what was originally communicated and expected. This change will have real and negative impacts on current residents, including:
• Reduced property values, as high-density developments are not consistent with the existing character of the neighborhood nor with the expectations set at the time of purchase.
• Increased traffic congestion and parking strain on streets that were not designed to support added density.
• Loss of the promised commercial amenities that would have benefited the entire community and supported local walkability.
• Erosion of trust between the city, developers, and residents when commitments and long-term plans are altered without adequate community input.

I respectfully request that the City uphold the original land-use designation and require the developer to adhere to the plans and commitments made when this neighborhood was built. At minimum, I ask that the City pause this rezoning process until a comprehensive community impact study is completed and residents have meaningful opportunity to provide input.

Our neighborhood depends on thoughtful, consistent planning that respects both the promises made to residents and the long-term vision for our community. I urge the City to protect that vision and deny the proposed rezoning.

Thank you for your consideration.
Client IP = 73.151.183.17

McKencie Perez

From: noreply@revize.com
Sent: Sunday, November 30, 2025 9:18 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Erin Crowe
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] n Hughes ave. Clovis, 93612
textarea-1755209560293 = My house backs up to one of these properties. This will only increase the amount of people walking around this area at night. I have already had someone walking around my backyard one night smoking weed, and knocked over my plants and broke them. I have seen young teenagers walking around the businesses and purposed property late at night and early in the morning. Not to mention the privacy factor. If a multi story unit is put in with windows on the side facing my house, these people will be able to see everything in my yard and will be able to see into my home. Lastly the property size is not even big enough. It would only be big enough for like 2-3 families to live. The lot is odd shaped and would be forced to build up against my property. Near this property is a bank and across the street is a planned luxury car lot! None of these businesses want this near their businesses. Crime will increase, so they better increase the budget for code enforcement, police, all the things that this WILL bring to our city.
Client IP = 104.28.123.93

McKencie Perez

From: noreply@revize.com
Sent: Sunday, November 30, 2025 3:53 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Leeanne Branham
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] RICHMOND AVE
textarea-1755209560293 = My concern is with parcels 157 and 197. I am concerned the 2 line, stop sign regulated roads at this intersection cannot handle the increased traffic from TWO high density housing additions at the same intersection. Already during rush hour we back up from dewolf almost to 168 going through that stop sign one at a time. And virtually everyone iscturing right, so to receive we would need 2 right turn lanes. Not possible onto a one lane each way Dewolf. To expand Dewold you would need to cut into each of these lots, decreasing number of units possible. Also this is the main entrance to all the neighborhoods along Dewolf. Detour required for construction would be both an inconvenience and a safety hazard for all these neighborhoods if emergency personnel needed to access. Why are you not looking at land east of temperance along Owen's Mountain Parkway that is already being developed? Still our general neighborhood but roads are already in progress to support development.
Client IP = 73.66.145.220

McKencie Perez

From: noreply@revize.com
Sent: Monday, December 1, 2025 8:52 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Sherry Louise Pedersen
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Sunnyside Avenue
textarea-1755209560293 = 595,596,597 sites. Why are these sites chosen to be very high density. I do not want my neighborhood to become crime ridden as so many of the high density housing projects become. I am very upset about this location. I have owned my property since 1984. How many apartments are allowed in these three zones?
Client IP = 192.145.118.62

McKencie Perez

From: noreply@revize.com
Sent: Monday, December 1, 2025 3:38 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Jeff Wolpert
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Palm Ave # 101
textarea-1755209560293 = Hi McKencie,
As you know I am representing Afrain Karimkhanzand at 3959 Shaw.
I understand her parcel is one being considered for infill. If this property is zoned for the higher density it would be likely sold to a affordable developer.
If all goes as planned will this property have a "By Right" overlay? Would the City and County have grants for such a project? State funds are short as I am sure you know.
I am planning on attending the meeting tomorrow, will you address these issues?
Client IP = 12.216.223.178

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 2, 2025 9:16 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ian King
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Heritage Avenue
textarea-1755209560293 = Is there any type of petition residents can sign to go against this rezoning. (Particularly for 197 and 157). If residents are not in favor of this rezoning what is City of Clovis doing to address this issue?
Client IP = 99.99.107.206

McKencie Perez

From: Susan Colby <[redacted]>
Sent: Tuesday, December 2, 2025 10:24 AM
To: McKencie Perez
Subject: Re: Assistance Again

Hello, we are in one of the areas where Infill Rezone Program is being considered. I tried to give my input on the suggested page but the submit button isn't working. So I am sending you my concerns. Please share them when this is brought up. Thank you.

I am VERY OPPOSED to any multi housing units to be built to my home. The proposed area is on Clovis Ave, between Palo Alto and Sierra. The lot is small and any housing units would be very crowded, not to mention surrounded by a school and commercial businesses. We live in a quiet, well established area and it needs to stay that way. Having a low income housing development will severely cause depreciation to my home and cause my family to deal with the noise that this will cause. Not to mention the safety issues that it will cause. Also there is also way too much traffic on Clovis Ave and Palo Alto and I am shocked that severe accidents haven't happened. By putting in a multi family development will increase the traffic. If the City approves this request, you an be sure my home will be up for sale and we will move. We are already dealing with a neighbor that causes chaos for us and we cannot bare anymore.

Thank you,

Susan Colby

> On Dec 2, 2025, at 10:08 AM, McKencie Perez <mckenciep@clovisca.gov> wrote:
>
> Good morning,
>
> Thank you for your email. If you would like to submit comments, please respond to this email with the comments. Once I receive that email, I will make sure they are provided to the Planning Commission and City Council.
>
> Thank you,
>
> <image001.png>
> **McKencie Perez**
> Deputy City Planner | MPA
> Office: 559-324-2310
> mckenciep@clovisca.gov
>
> **From:** Susan Colby [redacted]
> **Sent:** Saturday, November 29, 2025 12:21 PM
> **To:** Andrew Haussler <andrewh@clovisca.gov>
> **Subject:** Re: Assistance Again
>
> Hello,

I am not sure who else to reach out to, so I am sending my concern to you.

We received a post card regarding the Infill Rezone Program and I tried sending in my comments to my ABSOLUTE HATRED for this to happen near my home. Unfortunately the Submit button on the page is not working so I cannot submit my comments. I would really like the City Council to hear my opposition and why.

Thank you!

Susan Colby
This e-mail may contain confidential and privileged material for the sole use of the intended recipient. Any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended recipient (or authorized to receive for the recipient), please contact the sender by reply e-mail and delete all copies of this message.

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 2, 2025 6:22 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kayleigh Moranda
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Graybark Ave Clovis CA
textarea-1755209560293 = Putting this “project” right near Harlan ranch is a horrible idea. There is already poor traffic flow in this area with 1 lane each way and people speed down Quincy Ave going 40+mph in a neighborhood and 200+ additional homes would make this so much worse. It’s literally a danger to kids in this area. Find an area where it won’t be such a detriment to traffic with more space for this.
Client IP = 108.71.98.181

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 2, 2025 6:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Derek Thomason
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Goshen Ave. Clovis, CA 93611
textarea-1755209560293 = Putting high density housing on alluvial and nees avenues off of Fowler Avenue will add to our traffic problems and congestion. It will also have a negative impact on our property value. Why should we have two of these projects adjacent to our neighborhood?
Client IP = 45.131.194.166

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 2, 2025 7:39 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us
Attachments: Christopher_Bosworth_Rezoning_Objection 2.pdf

text-1755209425252 = Christopher Bosworth
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Corazon Ave, Clovis CA 93619
textarea-1755209560293 = Please see attached
Client IP = 23.113.44.151

Christopher Bosworth

1522 Corazzo Ave.

Clovis, CA 93619

[redacted]

December 03, 2025

Ms. McKencie Perez, MPA

Deputy City Planner

City of Clovis – Planning Division

1033 Fifth Street

Clovis, CA 93612

mckenciep@clovisca.gov

Re: Formal Objection to Rezoning of Parcels 115 and 590 Near Shaw & Leonard (Infill Rezone Program)

Dear Ms. Perez,

I am submitting this letter as a formal objection to the proposed rezoning of Parcels 115 and 590, located near Shaw and Leonard, as part of the City's Infill Rezone Program. I request that this letter be entered into the official public record for both the Planning Commission and City Council proceedings.

While the City must comply with the Martinez v. City of Clovis judgment, the specific selection of Parcels 115 and 590 is a discretionary choice made by the City—not a requirement of the court. The City's own presentation confirms this, stating that 24 parcels were initially identified, 10 property owners requested removal, and the City removed those parcels, while 6 additional parcels were added at the request of property owners. The final list of 20 parcels is entirely City-selected.

This proves that no individual parcel is mandatory, and the City retains full authority to remove or substitute parcels as needed. Therefore, Parcels 115 and 590 can be removed without jeopardizing compliance.

1. Parcels 115 and 590 Are Not "Strictly Necessary" Under Government Code §65759

The CEQA exemption under GC §65759 applies only to actions strictly necessary to bring the Housing Element into compliance. Because the City has already exercised discretion in adding and removing parcels, neither Parcel 115 nor Parcel 590 qualifies as “strictly necessary.”

Accordingly, the City cannot claim that these parcels must be included, CEQA exemptions may not apply, and a higher level of environmental review may be legally required.

2. Rezoning Conflicts With the General Plan Due to Major Infrastructure Deficiencies

The rezoning of Parcels 115 and 590 is incompatible with current General Plan standards, given the significant and longstanding infrastructure failures in the Shaw & Leonard corridor:

- The Shaw Avenue widening and underpass have been planned for over a decade and remain incomplete.

- Sidewalks remain missing or inadequate, forcing children and pedestrians to walk along dirt shoulders.

- Traffic congestion already exceeds capacity due to extensive residential growth and the recently developed commercial center.

- Insufficient roadway width and congestion negatively impact emergency response access and times.

Rezoning to R-3 or R-4 for Parcels 115 and 590 violates General Plan requirements tied to infrastructure and public safety.

3. The Environmental Assessment Must Fully Address Traffic, Safety, and Cumulative Impacts

The City presentation states that a “specialized Environmental Assessment (EA)” will be prepared. This EA must rigorously analyze roadway capacity, pedestrian safety, emergency access, cumulative impacts from nearby high-density housing, and added traffic from the new Shaw & Leonard commercial center.

Any EA that fails to address these known deficiencies would be incomplete and vulnerable to challenge.

4. Cumulative Impacts Make Parcels 115 and 590 Particularly Unsuitable

These parcels lie in an already overburdened area characterized by existing multi-family housing, a new commercial center with high-traffic businesses, heavy congestion, incomplete pedestrian pathways, and a decade of delayed roadway improvements.

Adding more high-density zoning will worsen traffic, reduce emergency access, increase safety risks, and negatively affect home values for residents who relied on the City's prior infrastructure commitments.

5. Formal Request for Removal of Parcels 115 and 590

For the reasons detailed above, I respectfully request that the City:

1. Remove Parcels 115 and 590 from the Infill Rezone Program.

2. Provide written justification demonstrating why these parcels are considered "strictly necessary" under GC §65759.

3. Demonstrate General Plan consistency.

4. Release the complete Environmental Assessment (EA) for public review.

Conclusion

The proposed rezoning of Parcels 115 and 590 is not required by the court, is inconsistent with the City's General Plan, and would impose serious burdens on a corridor that already lacks the infrastructure necessary to support additional density. The City should remove these parcels from the rezone list in the interest of public safety and responsible planning.

Sincerely,

Christopher Bosworth

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 2, 2025 8:23 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = John Chen
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Notting Hill Lane, Clovis Ca 93619
textarea-1755209560293 = I would like some info regarding parcels 197 and 157 with regards to what type of high density housing is proposed, whether they will be part of the Harlan Ranch Association, also how parking for such a plan would work in that location because there is already a shortage of parking for the Elevations homes as it is. Would want to see a feasibility study to show possible impacts to the area in regards to having that many more people in that area.
Client IP = 174.236.243.53

From: Jennifer Schantz <[redacted]>
Sent: Tuesday, December 2, 2025 8:37 PM
To: Vong Mouanoutoua <vongm@clovisca.gov>
Cc: Diane Pearce <dianep@clovisca.gov>; Lynne Ashbeck <lynnea@clovisca.gov>; Matt Basgall <mbasgall@clovisca.gov>; Drew Bessinger <drewb@clovisca.gov>
Subject: Concerned resident- I strongly do not support rezoning Shaw and Leonard

Dear Clovis city council,

I am not able to attend the council meeting on December 4th. As a homeowner, local business owner and voter, I want my voice heard on this matter.

As a homeowner in Loma Vista off of Shaw and Leonard, I do not support and strongly encourage the Clovis City Council to reconsider rezoning for residential at Shaw and Leonard. We do not need any more residential buildings in our neighborhood.

Traffic is already high, people drive fast up Leonard, accidents occur almost weekly at the four way stop, there are no side walks in some areas, and when we bought our home four and a half years ago, we were told that the shopping center was going to be walking and biking friendly, it is not.

There have been zero events at the park which was also promised to us and the walking/biking trail was supposed to extend 18 miles, all of which have not happened. This has been extremely disappointing. Instead we got a new huge housing development and dog creek is almost gone.

Having residential and/or apartments of any kind in the area of Shaw and Leonard makes no sense at all. We are neighborhoods, houses with farms, and orchards. This is the small town feel we love and what made us move to East Clovis.

Apartments and low income housing will absolutely bring down my home value which makes me extremely upset. We moved to east Clovis for the quiet small town feel. We moved away from the busy and trafficked areas south of here. Building more residential and/or apartments makes our quiet neighborhood noisy and the small town feel, very cramped and busy which ultimately increases traffic and crime. And decreases our home values.

Please stop rezoning and stop building residential on Shaw and Leonard. This is bad for our community, neighborhoods and our city.

Jennifer Martin-Schantz

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, December 3, 2025 9:36 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Joseph Payne
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Junipero Ave
textarea-1755209560293 = Myself and the community I live in really hopes that you guys reconsider the rezone of the SE areas. When purchasing a home in this area years ago, we were promised so much more than what we are receiving. We were told there would be a beautiful, never before done shopping center and restaurants at Shaw and Leonard only to receive fast food and low-quality retail that you could have drove down Shaw to go to already. There is already high-density residential housing and apartments that have been built in this area. Loma Vista was supposed to be so much more than what it has become. I won't even begin to describe how dangerous the roads in this area are. Lack of cross walks and infrastructure is a huge issue here, especially with kids having to walk to school. Anytime these issues are brought up, everyone just passes the blame onto either the school, city or developers. I really hope this is reconsidered and you guys begin to reevaluate what is happening in Loma Vista.
Client IP = 207.114.160.2

McKencie Perez

From: Kayleigh Moranda <[redacted]>
Sent: Wednesday, December 3, 2025 9:54 AM
To: McKencie Perez
Subject: Re: Planning Infill Rezone Program Form - contact us

Another thought is that that area does a disservice to people who are lower income. There is nothing walkable anywhere near (gas, grocery stores, food places, workplaces.etc). Could make it hard for lower income people being near Harlan ranch and on Dewolf/Quincy without access to anything.

On Wed, Dec 3, 2025 at 9:52 AM McKencie Perez <mckenciep@clovisca.gov> wrote:

> Good morning,
>
> Thank you for submitting comments, they have been received and will be considered by the Planning Commission and City Council.
>
> Thank you,

McKencie Perez
Deputy City Planner | MPA
Office: 559-324-2310
mckenciep@clovisca.gov

From: noreply@revize.com <noreply@revize.com>
Sent: Tuesday, December 2, 2025 6:22 PM
To: McKencie Perez <mckenciep@clovisca.gov>
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kayleigh Moranda
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Graybark Ave Clovis CA
textarea-1755209560293 = Putting this “project” right near Harlan ranch is a horrible idea. There is already poor traffic flow in this area with 1 lane each way and people speed down Quincy Ave going 40+mph in a neighborhood and 200+ additional homes would make this so much worse. It’s literally a danger to kids in this area. Find an area where it won’t be such a detriment to traffic with more space for

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, December 3, 2025 11:22 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Arielle Duncan
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Amity Lane, Clovis
textarea-1755209560293 = I'd like to express my concern for the two proposed locations at Shaw and Leonard. There are a significant amount of new homes in this area, as well as many new businesses. The roads and infrastructure can not keep up with the amount of traffic. Adding additional homes would create an even larger problem than we already have at this location. The roads need to be widened before any more businesses or homes are added, as well as traffic signals.
Client IP = 71.193.50.100

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, December 3, 2025 11:52 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Pamela Freitas
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Rall Ave
textarea-1755209560293 = Before any additional housing is even considered the area surrounding Clovis East school and the neighborhoods located on the east side of Leonard between Loma Vista and Gettysburg need sidewalks and crosswalks. The kids in these areas have no safe way to walk or bike to school. There have been multiple accidents involving either students or parents in the past 7 years. The fact that more housing is even being considered is irresponsible on the city's part. Let's make it safe for the kids to get to school and return home safely before we add more families to the mess.
Client IP = 73.116.106.176

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 7:48 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Jessica Hall
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Maine ave Clovis CA 93619
textarea-1755209560293 = I understand Clovis needs to comply with the CA ordinance about having low income housing. PLEASE consider the reasoning we just did for CUSD for overcrowding in schools. The current zoning plan with further strain the same school that all of our kids were just shuffled from/to! It may be easier to zone land that is on the outskirts where new schools can be built but is still Clovis proper? Be smart about it, come up with better ideas!

Client IP = 73.151.54.48

Briana Parra

From: Rebecca Simonian
Sent: Thursday, December 4, 2025 8:49 AM
To: Briana Parra
Subject: FW: Affordable Housing Development Plan

Follow Up Flag: Follow up
Flag Status: Completed

From: Esther Hicks <[redacted]>
Sent: Thursday, December 4, 2025 7:38 AM
To: Housing Program <housing@cityofclovis.com>; Vong Mouanoutoua <vongm@clovisca.gov>; Lynne Ashbeck <lynnea@clovisca.gov>
Subject: Affordable Housing Development Plan

Esther Hicks
1200 Scott Ave, Apt 137
Clovis, CA 93612
[redacted]
December 4, 2025

Clovis City Council
Clovis Housing Authority
1033 Fifth Street
Clovis, CA 93612

Dear Mayor, Councilmembers, and Housing Authority Members,

My name is Esther Hicks, and I am a resident of Clovis as well as a professional with a background in homeless services. Through my work and lived experience, I have developed a deep understanding of how housing policy affects individuals, families, and the broader community. I am writing to share my perspective regarding the structure of Clovis's low-income housing programs and to encourage policies that support long-term community stability, safety, and educational success.

Based on my experience in the field, I respectfully propose that Clovis prioritize two groups for low-income housing access:

(1) elderly residents living on fixed incomes, and
(2) individuals or families who are employed but earning up to 80% of the Area Median Income.

These groups often face significant financial challenges despite contributing greatly to the stability and continuity of our city. Ensuring that they have access to affordable housing provides needed support to

those with limited resources while also maintaining the strong neighborhood character that Clovis is known for.

Focusing eligibility on seniors and working households can help preserve neighborhood property values by encouraging predictable occupancy patterns and long-term commitment to the community. Residents with consistent routines, work schedules, or fixed-income stability tend to contribute to safer, more cohesive neighborhoods.

Additionally, this approach supports positive educational outcomes. Stable housing, especially for families who are employed, reduces school turnover, promotes consistent attendance, and improves parental engagement. These factors directly benefit local schools and help maintain the high standards that Clovis families rely on.

My intention in offering these recommendations is to encourage a thoughtful, balanced approach to housing policy—one that aligns with Clovis's long-standing goals of supporting seniors, strengthening working families, protecting property values, enhancing neighborhood safety, and promoting educational stability.

Thank you for considering my input and for your continued commitment to responsible community development. I appreciate your time and your service to our city.

Sincerely,

Esther Hicks

Briana Parra

From: Jeannie Gentile <[redacted]>
Sent: Thursday, December 4, 2025 9:04 AM
To: CityClerk
Subject: Low income apts., condos or ?

Sent from my iPhone
To Clovis City Council,
I live in Fresno and have a daughter in Clovis. I've always loved Clovis, especially Old Town.
This X homeless whoever she is, said she'd like to live in Clovis, but can't afford it, I'm sure on the system. Well guess what I can't either & I work very hard. So too bad, work, make more money, that's how. Not from taking from our taxes & expecting free.
I know Clovis fought this, but I read they would not let the city respond & passed it. I know it wouldn't have mattered, they just wanted to pass it.
I'm just so so sorry that it did pass & they will build through out the city, not just a few spots. She had no right & our judicial system had no right, to place that awful burden upon Clovis. I'm so sorry, it sickens me. God bless you all.
I love Clovis, I hate that this happened. I hope your Police Dept. can handle this change.
Sincerely,
Jeannie Gentile
Fellow human being

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 11:09 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Phana heng
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] highland Ave
textarea-1755209560293 = The area is already congested, roads not wide enough. Adding low income housing/apartments will only add to the problem. I am not for this. Actual houses built in the area is the best option. Not multiplex housing.
Client IP = 172.226.212.127

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 11:55 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Darius Williams
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Chennault Lane
textarea-1755209560293 = 1)what was the criteria for choosing plots.
2)Have any of the plots been chosen within 800 feet or zone, in the building planner, council, or mayors location? If so could you please identify the plot and who and if none have been chosen in their areas could you please explain why.
3) have they plots been distributed through zip codes equally so there is not oversaturation of "affordable housing" or is there more concentration in certain zip codes
4) Have the maximum amount of units allowed been identified for each plot. If so where could we locate that information.
Client IP = 99.67.67.115

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 12:35 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Greg Gillenwaters
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Agua Dulce Ave
textarea-1755209560293 = I have a big concern with two apartment complex's (115 and 590) being built around us. My wife and I worked hard for years to save up and buy a home in a quite family neighborhood and now a year after we finally realize our dream, two apartment buildings are now planned to go up right next to us. What will it do for property value, crime, traffic?
Client IP = 12.245.131.126

McKencie Perez

From: Manbir Gill <[redacted]>
Sent: Thursday, December 4, 2025 2:02 PM
To: McKencie Perez
Subject: Few quick questions regarding Infill Zoning sites

Good afternoon Ms. Perez
Congratulations to the city on this project after long drawn litigation and negotiations. As a Clovis citizen I understand both perspectives and would like to thank you and your team for being communicative and reachable.

I'm writing today to not criticize or complain or as a NIMBY or YIMBY, but a concerned citizen who wants best for all renters/ residents and watchful of the developers and builders.

1.) Is site 157 one of the 6 parcels whose owner or legal representative of the owning entity requested to be included / rezoned?

2.) Is site 197 one of the 6 parcels whose owner requested to be included/rezoned ?

In regards to site 157: a lot of people in this area have been hoping for last many years for a commercial complex to be built for services.

Please pardon me for saying, keeping aside the need for rezoning to meet the judgement needs, it solely serves the financial interest of the owning entity to change it from P-C-C to High Density Residential as the owner has been trying to sell this parcel at an Exborbitant price unsuccessfully for a few years now. It will be prudent and fair to the residents if two adjacent parcels (157 and 197)are NOT rezoned right next to each other as this would affect this neighborhood disproportionately by taking away the planned commercial complex. Please consider the viewpoint of the area residents as well, in addition to the whims and wishes of the owning entity whose sole goal is turn a BiG Profit with its sale after R-3 zoning.

Again, we fully understand the need for additional housing and city's situation regarding the litigation and hope to find a solution that benefits the society with more affordable housing for most folks.

Please share your thoughts.

Warm Regards
Manbir Gill
[redacted]

McKencie Perez

From: Alan Layne <[redacted]>
Sent: Thursday, December 4, 2025 3:52 PM
To: McKencie Perez
Subject: Clovis infill redone program. Citizen response

Sent from my iPhone
Site # 157 The site on Richmond and de wolf. I would like your guarantee that proper drainage will be approved by engineer ing department. 2nd that a high wall is included on Richmond and Pamela. I also would like the bus stop that has been paused to be at the corner of Richmond and N. Vanguard way. We are meeting with the head of the transit system. We also would like existing hazmat materials and soil removed and tested after removal. The other hazmat dump on Owen's mountain park way should be addressed also. If after rezoning a development application is submitted , I am requesting to be contacted to discuss the above issues .
From: Alan Layne
[redacted] N Vanguard Way
Clovis CA 93619
[redacted]

McKencie Perez

From: Renee Mathis
Sent: Thursday, December 4, 2025 2:56 PM
To: McKencie Perez
Subject: FW: Proposed rezoning

Renee Mathis
Director of Planning & Development Services
Office: 559-324-2351
ReneeM@clovisca.gov

From: Andrew Haussler <andrewh@clovisca.gov>
Sent: Thursday, December 4, 2025 2:39 PM
To: Renee Mathis <ReneeM@clovisca.gov>
Cc: Briana Parra <brianap@clovisca.gov>; Rebecca Simonian <rebeccas@clovisca.gov>
Subject: FW: Proposed rezoning

Please include with the comments on this item.

Andy

From: Stacey Johnson <[redacted]>
Sent: Thursday, December 4, 2025 2:29 PM
To: Council Districts <councildistricts@clovisca.gov>
Subject: Proposed rezoning

I live in the Loma Vista development. I am very much opposed to the two proposed high density housing projects. There is so much trraffic already that this would only cause major traffic concerns. I am so upset with the Leonard and Shaw intersection already. More traffic would make it much more of a traffic hazard than it already is. I think it is more than time to fix the intersection with a traffic light and widen the road. It is unbelievable that Shaw was widened from Leonard to McCall and then put in a traffic light there. The traffic there is mainly from homes. The traffic is so very congested at Shaw and Leonard and the road needs repairing, at the very least. I have seen so many fender benders and near accidents at the intersection. I have also seen young people trying to cross the intersection and an almost fatal accident with young people crossing the road on bikes and scooters. The mall has added much more traffic but I am so very happy to have the food and other businesses nearby. I moved to Clovis to live in a quieter and less congested neighborhood. Please reconsider the proposed high density housing. This is not the area to put in high density housing, it is too congested already and our "safe" community will certainly change with so many people. Please do not change our neighborhood. Thank you.

S. Johnson

McKencie Perez

From: Briana Parra
Sent: Thursday, December 4, 2025 3:17 PM
To: McKencie Perez
Cc: Renee Mathis
Subject: FW: Opposing to Loma Vista Neighborhood Rezoning

Here is another

Briana Parra, CMC | City Clerk
Clovis City Hall | Administration
1033 Fifth Street, Clovis, CA 93612
P. 559.324.2057
Brianap@clovisca.gov
https://www.clovisca.gov/

From: Rebecca Simonian <rebeccas@clovisca.gov>
Sent: Thursday, December 4, 2025 3:12 PM
To: Briana Parra <brianap@clovisca.gov>
Subject: FW: Opposing to Loma Vista Neighborhood Rezoning

From: Chelsea MacLane <[redacted]>
Sent: Thursday, December 4, 2025 3:08 PM
To: City Council <citycouncil@clovisca.gov>
Subject: Opposing to Loma Vista Neighborhood Rezoning

To whom this may concern,

My name is Chelsea MacLane, mother of three young girls. I am reaching out to take a stand against the rezoning of our Loma Vista neighborhood to build high density housing.

Not only will this bring down the value of our family and friends' homes, it will bring a large amount of traffic and danger to our children. The amount of traffic and incidents as it is have already been higher than the average neighborhood. I am asking to please put an end to this rezoning plan.

I fear there is not enough public knowledge on what is coming and not enough time to bring awareness for everyone to have an opportunity to voice their opinion. I will be spreading the word to our neighbors as best as I can.

Please let me know what other steps I can take to help stop the progress of the rezoning plans. Feel free to email or call me.

Most Appreciated,
Chelsea MacLane

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 6:12 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Andrew Golden
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Longford Way, Clovis, CA 93619
textarea-1755209560293 = Please do not put any high density or ultra high density housing in the parcels in and/or around Shaw/Leonord, Gettysburg/Leonard, Shaw/DeWolf, Gettysburg/DeWolf. The nearby shopping center is standardized fast food/low quality shopping and does not deliver on proposed/promised shopping center. Adding more dense housing to an already dense housing neighborhood will further devalue properties, traffic, and negatively impact the neighborhoods. I oppose any re-zoning actions in the aforementioned areas.
Client IP = 73.151.60.86

McKencie Perez

From: Amy Hall <[redacted]>
Sent: Thursday, December 4, 2025 9:39 PM
To: McKencie Perez
Subject: No apartments on Leonard and Fowler!

I bought my home brand new in 2020 and it backs up to the proposed apartment complex location on Leonard north of Shaw. This will not only lower the value of my home, but it will also make my property less enjoyable. The worst part is the traffic congestion that is already awful in the area will become worse. Its dangerous to pull out on to Leonard. You can't see traffic coming from the south and to add in more cars at this location would be incredibly dangerous. It's too high of a traffic area to be adding in apartments.
Sent from my iPhone

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 4, 2025 10:47 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ingrid O'Neal
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N De Wolf Avenue, Clovis, CA, 93629
textarea-1755209560293 = Dear Ms. Perez,
Would you please provide me with information about how these plans would affect our current rural way of life that I and my neighbors hope to maintain? My address is within the sphere of influence markings on the map. Thank you.
Client IP = 146.75.146.62

McKencie Perez

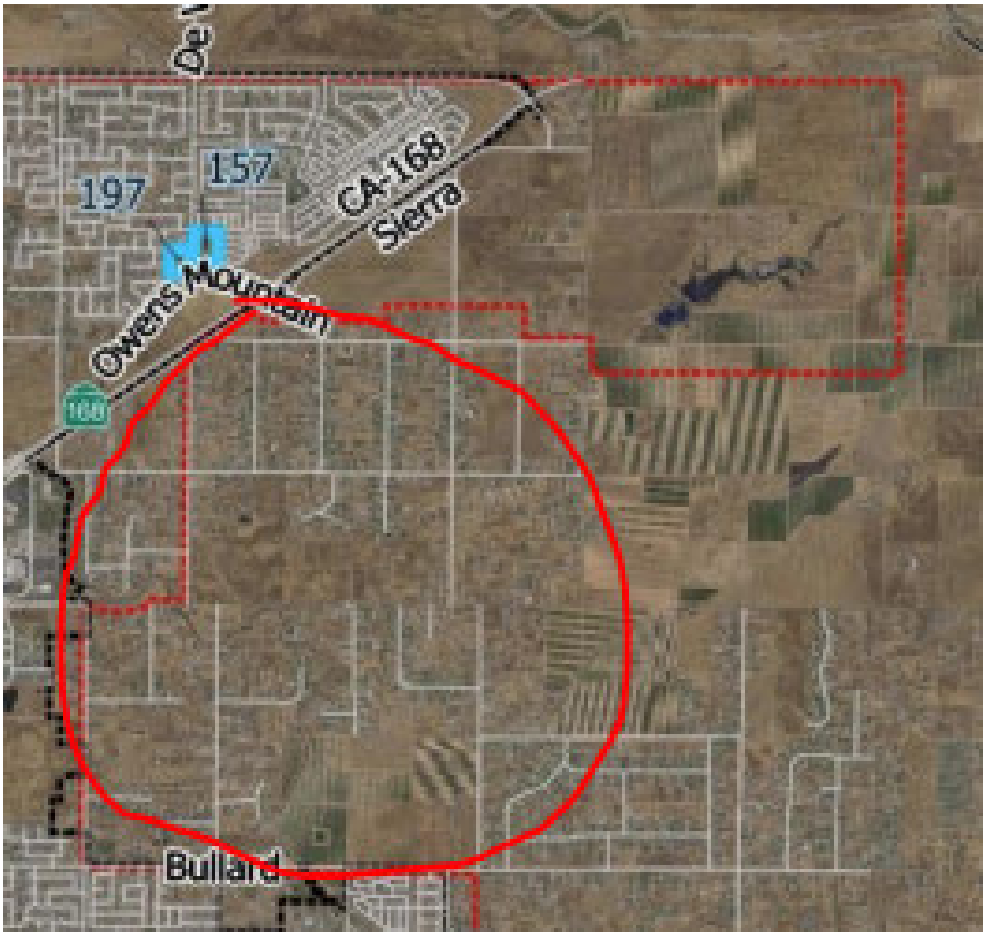
From: Mainou Her <[redacted]>
Sent: Friday, December 5, 2025 9:46 AM
To: McKencie Perez
Cc: kevinkerney@cusd.com; denverstairs@cusd.com; Kong Vang
Subject: Inquiry: Infill Rezone Impacts on Clovis Unified Attendance Zones

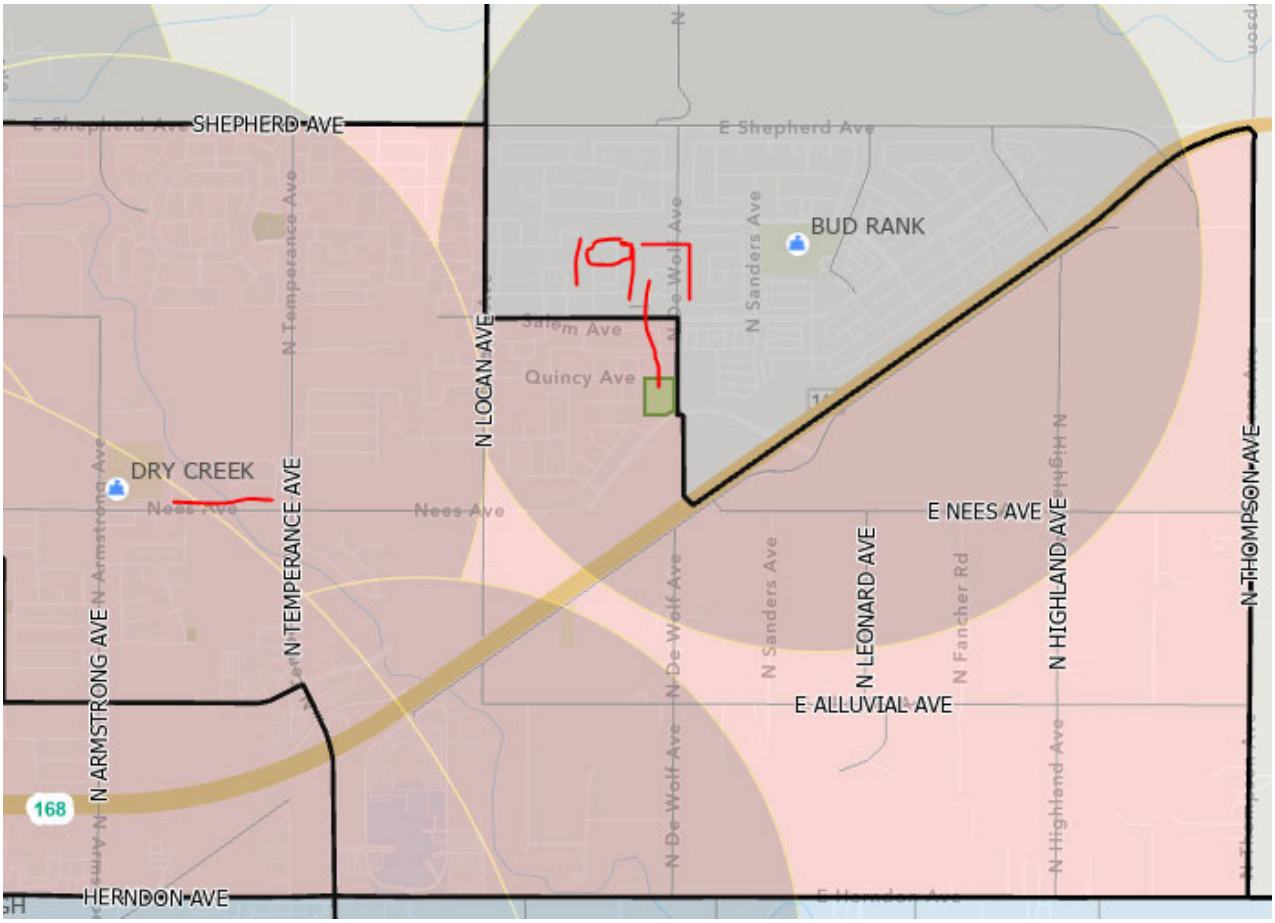
Dear Ms. Perez,

Thank you for the public information materials on the Clovis Infill Rezone program. I first learned about it through recent news coverage and then through the City's website.

I understand this rezoning stems from a legal compliance requirement tied to the 2019 Martinez legal judgment. However, one concern I would like clarification on concerns school attendance boundaries and enrollment impacts within the area highlighted in the attached image.

Although the closest rezone sites to my property are Sites 157 and 197, which sit across the 168 freeway. Our neighborhood, shown in the red circle on the attached map, falls within Clovis Unified's attendance zones, specifically the Buchanan area. Based on City mapping, some of the rezoned capacity appears to be designated for higher-density housing (apartments/townhomes, etc), which is likely to result in increased student generation.

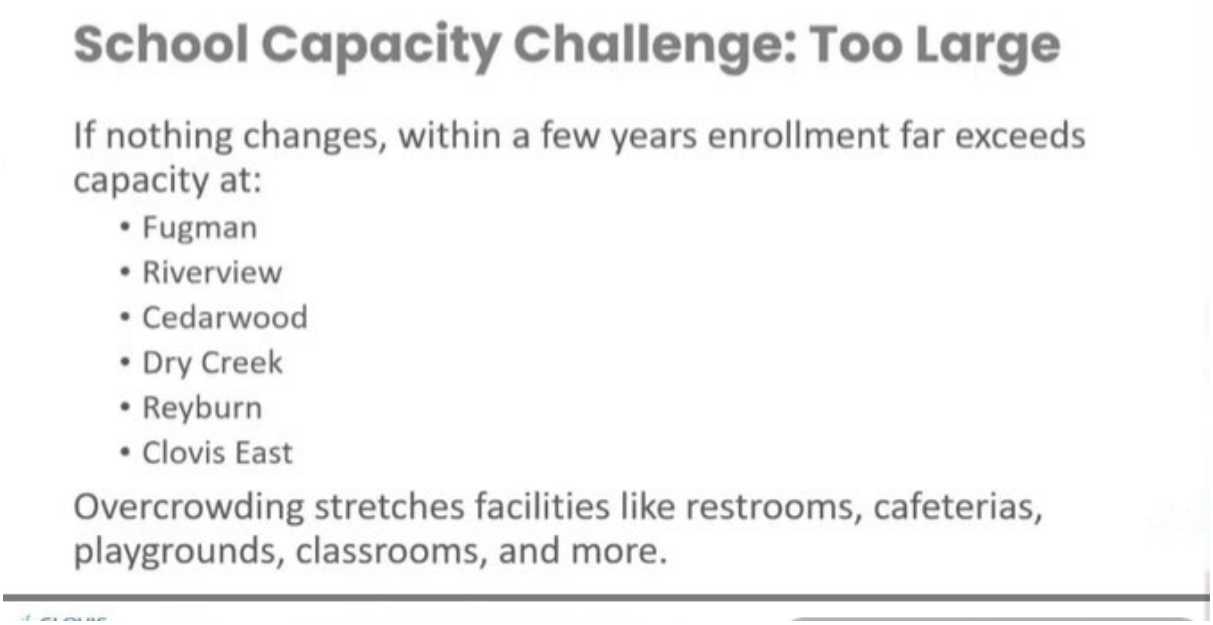




This raises a question I hope the City can address for my neighboring community:

Has the City consulted with Clovis Unified on how the rezoning could affect future enrollment or attendance boundaries over the next decade, particularly for the schools serving this circled area?

Given that CUSD recently completed its own rezoning process and publicly discussed projected housing and population impacts (including references around the 11:25 and 19:05 marks of a district presentation), it seems important for the school district to be a partner in these conversations, especially before rezoning effects become operational.



Projected Enrollment Over Next Decade

Area	New Single-Family Homes	New Apartments	Projected Population Growth
Buchanan Area	267	642	-512
Clovis East Area	5,562	1,825	2,038
Clovis High Area	519	399	-922
Clovis North Area	7,464	2,300	2,425
Clovis West Area	440	442	-366

I am copying Clovis Unified Assistant Superintendent for Buchanan Area, Kevin Kerney, and Assistant Superintendent of Facility Services, Denver Stairs, on this correspondence so they are aware of the request. Any clarification on whether the City has already coordinated with the District or intends to incorporate school capacity analysis moving forward would be greatly appreciated. My neighbors have expressed serious concerns that our community could be affected by the proposals shared with the public last year, which may shift us to the Clovis High area.

Thank you for your time and transparency as this process unfolds.

Sincerely,

Mai Her

McKencie Perez

From: Pine and Palm <[redacted]>
Sent: Friday, December 5, 2025 1:11 PM
To: McKencie Perez
Subject: Infill rezone - Leonard Ave, Loma Vista

McKencie Perez & City of Clovis Planning Division,

We are homeowners in the Loma Vista neighborhood, living at [redacted] Keats Ave, with our rear property line directly connected to the parcel at [redacted] Leonard Ave. My family has invested heavily in this neighborhood and we own two homes in Loma Vista. We expected to remain here long term, but that expectation has been shaken by the pattern of decisions the City of Clovis has made regarding this long-planned community.

In the past year alone, we have invested roughly $150,000 in our home, above just the purchase price, that shares a fence line with this parcel. We purchased another house nearby we felt would be a great investment due to the Loma Vista Master Plan that is seemingly being abandoned more and more each day.

I recognize that state housing law and recent litigation have placed the city under pressure to identify infill sites and increase zoning capacity for multi-family and affordable units. I also understand that the current infill rezone program includes multiple parcels across the city, not only this one.

When we purchased our home, the parcel behind us was designated for single-family residential under the adopted plans for the Loma Vista area. We relied on those adopted plans and zoning designations when selecting this lot and making substantial investments in our property.

My wife, Jerrissa Adkins, even worked as the new home sales agent for the builder Century Communities during that period selling this neighborhood and was instructed that this parcel behind us and many other of our neighbors was medium-density residential which influenced many buying decisions. Her professional reputation is now affected by the city's departure from the published planning information she was required to convey to buyers.

In addition, the nearby commercial centers have shifted toward uses that diverge from what was originally described in the long-term vision for Loma Vista. The cumulative effect is a noticeable change in how this neighborhood is beginning to feel and function, making the proposed up-zoning behind our fence line particularly impactful.

The most significant concern for our household is the prospect of three- or four-story buildings directly on our rear fence line, with upper-story units looking down into our yard and rear windows. That level of height and adjacency would materially alter the privacy, security, and daily use of our home. Several nearby parcels to the south and west are also being considered for similar up-zoning. If all are pursued simultaneously, this neighborhood becomes encircled by high-density designations, which is not consistent with the adopted planning documents or the expectations set when these homes were sold.

I also want to note that, due to my position as the CEO of a large cybersecurity and technology company, I am already subject to elevated personal security protocols, including routine security sweeps of my

residence and radius of areas. Introducing high-density development directly adjoining our yard materially changes the exposure profile for my family and heightens risks that are already managed at considerable cost. This is not even mentioning a triangulation of sites (directly south, west, and north) now rezoned around us which encapsulates this neighborhood with high/very high density zonings with some affordable designations.

Given the direct impacts to existing homes and the original planning expectations for this area, we request that the city remove this parcel from the current rezone proposal, pause any action on it, and redirect the zoning obligation to alternative locations that can meet state requirements with fewer conflicts and a more appropriate fit. I may even be open to purchasing the property if a re-zone could be granted to another use.

I appreciate the difficult position the city is in as it works to comply with state housing law and the recent settlement. At the same time, decisions made now will shape the character and livability of this neighborhood for decades. The long-standing vision for Loma Vista continues to erode due to inconsistent development patterns and city actions that do not align with what residents were told to expect.

My family and I will be following this process closely and plan to participate in all upcoming meetings and hearings. I ask that adjacent residents be treated as stakeholders in this process and that the city refrain from advancing unilateral decisions without direct consultation.

I look forward to hearing back regarding this.

Charles & Jerrissa Adkins

McKencie Perez

From: noreply@revize.com
Sent: Friday, December 5, 2025 1:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Victoria Reinhardt
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Heritage Ave
textarea-1755209560293 = I am very concerned about rezoning the two areas on Dewolf and Owens Mountain. I was a lifelong resident of Fresno and moved to Clovis to escape the increasing crime, homeless issues and traffic.
This is not the proper location of section 8 apartments. For many years I worked in areas in Fresno with large areas of section 8 apartments and have seen first hand what happens to the areas around section 8 apartments . Harlan Ranch does not want nor need this type of development. I am requesting that you reconsider these two areas.
Thank you
Victoria Reinhardt
Client IP = 98.255.30.36

From: Rosemarie Bezerra-Nader <[redacted]>
Sent: Friday, December 5, 2025 9:29 PM
To: McKencie Perez
Subject: REZONE

A high density development would best serve the greatest number of people and preserve existing neighborhoods by rezoning some of the many vacant parcels on International and Behymer, near Clovis Community College. Doing this would serve community college students and their families —— much like the communities around Fresno State do.

McKencie Perez

From: Kenneth Shipley <[redacted]>
Sent: Saturday, December 6, 2025 1:09 PM
To: McKencie Perez
Subject: Questions re: Infill Sites 197, 157

Hi McKencie, I have looked at the infill site map and am confused about the location of two of the sites.

1. On the map where the sites are identified in blue, Site 197 looks like it is just west of DeWolf--but the address listed on the Site List is 1497 N. Locan Ave. From the streets, it looks like Site 197 might be on the northeast corner of Locan and Quincy. Is Site 197 off DeWolf or off Locan? Can you give me the surrounding streets for Site 197?

2. On the map it looks like Site 157 (no address) is probably on the east side of DeWolf between Quincy and Owens Mountain. Would this be correct?

Sorry to bother you with the questions, but I have been curious and haven't really been able to tell where these two sites are. Thank you, Ken

McKencie Perez

From: noreply@revize.com
Sent: Saturday, December 6, 2025 2:42 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Vicki Knapp
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] La Canada Ave
textarea-1755209560293 = So let's impact are already full schools and play the school shuffle once again? Seriously you must consider school issues before building anything more in this area.
Client IP = 23.113.47.193

McKencie Perez

From: noreply@revize.com
Sent: Sunday, December 7, 2025 1:15 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Anthony Avila
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Graybark Ave Clovis CA 93619
textarea-1755209560293 = Re: Formal Objection to Proposed Rezoning — Site #197 (1497 N. Locan Ave, Clovis CA)
To: City of Clovis – Planning & Development Services
From: Residents of the Locan Avenue Neighborhood
Date: 12/07/2025

Dear Honorable Planning Commissioners and City Councilmembers,

We, the residents of the Locan Avenue neighborhood and surrounding areas, submit this formal objection to the proposed rezoning of Site #197 (1497 N. Locan Ave) as part of the Infill Rezone Program. While we recognize the City's obligations under State housing mandates and settlement agreements, California law is equally clear that rezoning actions must be internally consistent, properly supported by infrastructure, legally defensible under CEQA, and fully aligned with the General Plan. Rezoning this parcel fails to meet those requirements and exposes the City to significant legal and procedural risks.
To comply with California Government Code, CEQA, and the City's own adopted policies, we respectfully request that Site #197 be removed from the rezoning list.
Below are our principal concerns, including strengthened legal bases:
1. Traffic Safety & Roadway Capacity — Failure to Mitigate Required Impacts
Locan Avenue is a constrained corridor lacking shoulders, sidewalks, turning lanes, and safe bicycle/pedestrian infrastructure. A substantial increase in vehicle trips triggered by R-3/R-4 zoning would create predictable and unmitigated safety hazards.
Under CEQA Guidelines §15064.3, VMT and safety impacts must be analyzed using substantial evidence. Rezoning that introduces higher-density traffic onto an unsafe, substandard roadway—without funded improvements—cannot be exempted or cleared through a Negative Declaration.
Further, Government Code §65300.5 (internal consistency) requires that zoning actions align with circulation system capabilities. This rezoning would not.
2. Incompatibility With Existing Neighborhood Character — Potential "Spot Zoning"
High-density zoning within a predominantly rural-edge, low-density environment would constitute a dramatic and unsupported deviation from the prevailing land-use pattern.
California courts have repeatedly invalidated zoning actions where a parcel is "spot-zoned" without a legitimate public interest, or where the zoning is inconsistent with surrounding uses (e.g., Foothill Communities Coalition v. County of Orange, 2014).
Changing Site #197 to multifamily residential:
• Disrupts established development patterns
• Fails to provide the required density transition
• Does not serve a unique public necessity that would justify a zoning outlier
Such inconsistencies place the rezoning in conflict with Gov. Code §§65860, 65867.5, and the City's own General Plan consistency requirements.

3. General Plan Inconsistency — Violates Gov. Code §65860
The General Plan presently designates this portion of Locan Avenue for low-density or rural-edge uses. A high-density designation:
• Contradicts the Land Use Map
• Violates policies governing compatibility, transitions, and rural-edge preservation
• Requires a General Plan amendment
Under Gov. Code §65860, zoning must be consistent with the adopted General Plan. Courts have held repeatedly that inconsistency renders a rezoning action invalid.
A General Plan amendment to justify this parcel's upzoning would itself be inconsistent with long-standing policy frameworks on neighborhood character and infrastructure capacity—and would set a precedent for arbitrary, parcel-by-parcel upzoning.
4. Insufficient Water, Sewer & Drainage Infrastructure — Violates State Law on Public Service Adequacy
The area currently lacks sufficient:
• Sewer trunk capacity
• Water pressure and reliability
• Stormwater and drainage infrastructure designed for high-density uses
California Government Code §65860(c) and §66473.7 (SB 610/SB 221) require public services to be adequate, available, and funded at the time zoning decisions are made—not at some hypothetical future point.
Additionally, CEQA requires a full analysis of utility capacity (CEQA Guidelines §15126.2(a)). A rezoning predicated on unfunded or speculative future improvements is legally vulnerable.
Because no approved or funded Capital Improvement Program (CIP) projects exist for this area, the rezoning is noncompliant.
5. School Capacity Impacts — Must Be Analyzed Under CEQA & Gov. Code
Schools serving this area are at or near capacity. Increased density will worsen overcrowding unless substantial mitigation is identified.
School districts may impose impact fees, but fees alone are not sufficient CEQA mitigation where significant impacts remain (e.g., Mira Monte v. County of Ventura, 2021). CEQA requires substantial evidence demonstrating that enrollment impacts are mitigated or reasonably addressed—not assumed.
Proceeding without proper analysis violates CEQA and the statutory planning obligations under Gov. Code Title 7.
6. CEQA Violations — A Negative Declaration Cannot Legally Suffice
Based on site context and foreseeable impacts, the City cannot legally rely on a Negative Declaration or a blanket Infill Program EIR to cover this parcel.
A project-level CEQA review is required for:
• Traffic and safety impacts (Guidelines §15064.3)
• Pedestrian hazards on a sidewalk-deficient corridor
• Agricultural/urban interface conflicts
• Noise, light, and privacy impacts on rural residences
• Biological resource impacts on undeveloped land
• Air quality impacts in a non-attainment region
Attempting to rely on a streamlined CEQA pathway would expose the City to litigation due to the presence of fair argument triggers under Guidelines §15064(f)(1). If a fair argument of potential significant impact exists, an EIR is mandatory.
7. Agricultural & Rural-Use Conflicts — Creates New Legal Liabilities for the City
This area contains small-scale agriculture, equestrian uses, and rural-edge activities. High-density development adjacent to these uses will create foreseeable nuisance complaints.
California's Right-to-Farm Act (Civil Code §3482.5) is designed to protect agricultural operations; however, rezoning to high density adjacent to existing rural activities increases the City's exposure to

conflict, code enforcement burdens, and land-use disputes.
Placing incompatible uses side-by-side contradicts long-standing General Plan directives and violates the State's own guidance on avoiding land-use conflicts.
Formal Request
Based on the regulatory inconsistencies, infrastructure deficiencies, and legal vulnerabilities outlined above, we respectfully request that the City of Clovis:
Remove Site #197 (1497 N. Locan Ave) from the Infill Rezone Program.
Replace it with a parcel that meets General Plan designations, infrastructure capacity, and compatibility requirements.
Conduct a full, parcel-specific CEQA environmental review if the parcel remains under consideration.
We strongly support responsible, well-planned growth that complies with State law, CEQA, and the City's adopted General Plan. However, rezoning this parcel would create substantial legal, environmental, and public-safety challenges and would undermine long-standing planning principles.
We appreciate your attention and respectfully urge the City to reconsider the inclusion of Site #197.

Sincerely,
Residents of the Locan Avenue Neighborhood
Anthony Avila and Family
[redacted] N Graybark Ave, Clovis, CA 93619
[redacted]

Client IP = 104.28.116.67

McKencie Perez

From: noreply@revize.com
Sent: Sunday, December 7, 2025 6:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Marlene Ellsworth
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] W Enterprise Avenue
textarea-1755209560293 = Absolutely oppose the rezone at Peach and Nees. That corner is already so impacted with traffic from the Buchanan complex and the Muslim school. This rezone would further aggravate the situation. Plus just not a good idea adding dense housing across from an elementary school. There are plenty of other areas in Clovis to rezone, leave this one as residential.
Client IP = 73.151.50.156

McKencie Perez

From: noreply@revize.com
Sent: Monday, December 8, 2025 9:07 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Rob Rahal
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Whiteash Ave.
textarea-1755209560293 = Understanding that there is no construction planned, please consider traffic patterns prior to any construction. Also consider commercial before more housing. There's really nothing up this way. Thank you.
Client IP = 73.90.12.228

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, December 9, 2025 12:00 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ann Goodwin
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] leonard Avenue
textarea-1755209560293 = I own property north of parcel 115..corner of leonard and keats...I am curios if city will be building or will developers..

Client IP = 195.155.18.28

McKencie Perez

From: Leigh Trovato <[redacted]>
Sent: Tuesday, December 9, 2025 5:07 PM
To: McKencie Perez
Cc: Trovato Terry
Subject: Infill site 157 question

McKenzie

We received the meeting invite and cannot attend on December 15.

I have a few questions.

What is the difference between High Density and Very High Density?

What is the plan for the traffic on Owen's Mountain Parkway and DeWolf and DeWolf and Richmond?

What developer is planning for this infill?

Thank you.

-Leigh
[redacted] Salem Ave
Clovis, CA. 93619
[redacted]

Sent from my iPad

McKencie Perez

From: noreply@revize.com
Sent: Thursday, December 11, 2025 5:24 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Erin Darchuck
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] w Jordan Ave Clovis, 93611
textarea-1755209560293 = I saw there were other sites considered. As a neighborhood, can we petition site 72 from being rezoned?

Also, CUSD just redid boundaries. Our school got a lot of new students and there are many grades that are at capacity. With high-density housing going in, what is the plan for our school?

Also, how many units are proposed for this site?
Client IP = 67.181.12.49

McKencie Perez

From: noreply@revize.com
Sent: Saturday, December 13, 2025 8:56 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Vanessa
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] las rosas
textarea-1755209560293 = Shaw and Leonard has not yet begun the Shaw widening project. They are expected to widen Shaw avenue to 3 lanes from Dewolf to McCall. That will worsen traffic to the area. The 4 way stop on Shaw and Leonard is a nightmare and dangerous for pedestrians. Rezoning that area for high density homes will only worsen the traffic. Clovis east students are constantly crossing that 4 way stop intersection and I've seen many almost get hit. We need to prioritize improving the roads/pedestrian safety before any new high density housing is considered. Nearby elementary school red bank and cedarwood are already experiencing higher teacher to student ratios. This will worsen with more housing. In addition, Clovis east is experiencing the same over crowding. High density housing would not be a good fit for Shaw and Leonard.
Client IP = 73.41.171.225

McKencie Perez

From: Nico Moreno <[redacted]>
Sent: Monday, December 15, 2025 3:56 PM
To: McKencie Perez
Subject: Concerns About Proposed Rezoning Near Shaw & Leonard

Dear Council Members,

I am writing as a resident whose home backs directly onto the parcels proposed for high-density housing. I want to express my strong concerns about the safety, traffic, and privacy issues this project will create for families like mine.

Traffic on Leonard is already extremely heavy, and turning out from Keats Ave is often difficult and unsafe due to poor visibility and constant vehicle flow. Adding high-density housing will only increase congestion and make this intersection even more dangerous for drivers, pedestrians, and children.

This project also threatens the privacy and security of the homes that share a property line with the proposed site. As a parent of two young children, I rely on having a safe backyard for them to play in, and this development raises serious concerns about losing that sense of safety, privacy, and peace of mind.

Additionally, our neighborhood still has unfinished sidewalks, missing infrastructure, and unresolved safety issues that affect residents every day. Before considering new high-density housing, I believe it is crucial to address these existing problems. I respectfully ask how the City plans to ensure public safety and resolve current deficiencies before introducing development that will amplify these existing issues.

I ask the Council to reconsider this rezoning and prioritize the well-being of the families who already live here.

Thank you for your time and attention.

Sincerely,
Nico Moreno

McKencie Perez

From: noreply@revize.com
Sent: Saturday, December 20, 2025 3:11 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Nimool Garcia
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N. Graybark Ave. Clovis CA 93619
textarea-1755209560293 = As a homeowner and parent, I am concerned that rezoning to allow higher-density affordable housing will negatively impact my family and the stability of our neighborhood. Increased density places significant strain on local infrastructure, including roads, parking, schools, and emergency services, which are already operating near capacity. Rezoning may also alter the character of a low-density residential area, leading to increased crime, increased traffic, noise, and reduced privacy for existing residents. From a financial standpoint, rapid changes in zoning and housing density can introduce uncertainty into the local real estate market, potentially affecting property values and long-term home equity for families who have made substantial investments in their homes. Additionally, insufficient planning, funding, or property management of affordable housing developments can result in higher turnover rates and maintenance concerns, which may further impact neighborhood cohesion and community standards. For these reasons, I believe rezoning decisions should carefully weigh the long-term consequences for current residents, families, and the overall sustainability of the neighborhood.
Client IP = 73.151.169.25

McKencie Perez

From: Judy Cornaggia <[redacted]>
Sent: Wednesday, January 7, 2026 12:20 PM
To: McKencie Perez
Subject: Infill Rezone Program Harlan Ranch

Judy Drilling

[redacted] Richmond Ave.

Clovis, CA 93619

[redacted]

January 7, 2026

McKencie Perez, MPA

1033 Fifth Street
Clovis, CA 93612

RE: Opposition to Rezoning Sites Harlan Ranch #157 & #197 – [Infill Rezone Program]

Dear McKencie Perez,

I am writing to formally express my strong opposition to the proposed rezoning of **sites 157 & 197** from Single-Family Residential to High-Density Multi-Family. As a resident of Harlan Ranch living directly across from the site, I am concerned that this development is inconsistent with the neighborhood's character and the City's Comprehensive Plan.

My opposition is based on the following material impacts:

- **Infrastructure Strain:** Our current water, sewer, and stormwater systems are already under pressure. Adding high-density housing will exacerbate these issues and may lead to increased maintenance costs for current taxpayers.
- **Traffic and Pedestrian Safety:** Dewolf, Richmond Avenue, and Pamela are not designed to handle the surge in traffic and parking issues this development would generate. I am specifically concerned about the safety of children and elderly residents who walk in this area.
- **Neighborhood Character and Privacy:** The proposed height and scale of this building are incompatible with the existing low-density homes. Multi-story units will directly overlook my private yard, significantly diminishing the quiet enjoyment of my property.
- **School Overcrowding:** Local schools are already at or near capacity. The influx of residents from this high-density project will create a burden that current facilities cannot support.

While I understand the need for housing growth, I urge the Planning Commission to reject this specific rezoning request and instead explore locations where high-density infrastructure is already in place. In addition, Harlan Ranch home buyers were promised access to commerce in this location by the plan developers when purchasing homes in this community.

Thank you for your time and for considering the long-term impact this decision will have on our community.

Sincerely,

Judy Drilling

McKencie Perez

From: Cheryl Rusconi <[redacted]>
Sent: Saturday, January 17, 2026 2:12 PM
To: McKencie Perez
Subject: Proposed Rezoning of sites 157 and 197

Dear McKenzie Perez,

We are writing to express our opposition to the proposed rezoning of sites 157 and 197 from Single-Family Residential to High-Density Multi-Family. As homeowners in Harlan Ranch who live directly across from the proposed site, we believe this change is inconsistent with the surrounding neighborhood and the City's Comprehensive Plan.

This proposal raises several serious concerns, including increased strain on already burdened water, sewer, and stormwater infrastructure; traffic congestion and pedestrian safety risks on streets not designed for high-density use; and the incompatibility of a multi-story development with the existing low-density homes, which would negatively impact privacy and neighborhood character. Additionally, local schools are already at or near capacity and may not be able to accommodate the increase in residents this project would bring.

While we understand the need for housing growth, we respectfully urge the Planning Commission to deny this rezoning request and instead direct higher-density development to areas with appropriate infrastructure in place. We would also note that Harlan Ranch homeowners were originally advised that this area would provide access to neighborhood-serving commercial uses, not high-density residential development.

Thank you for your time and consideration of the long-term impact this decision will have on our community.

Sincerely,
Cheryl and Steve Rusconi

McKencie Perez

From: [redacted]
Sent: Sunday, January 18, 2026 12:12 AM
To: Planning
Cc: Lily Cha
Subject: Formal Objection to Proposed Infill Rezoning of Parcels at DeWolf Avenue, Richmond Avenue, and Owens Mountain Parkway
Attachments: Clovis_Open_Letter_Park_Designation.pdf

Dear City of Clovis Planning Division and Planning Commission Members,

I am submitting this letter as a formal objection to the proposed infill rezoning of two parcels located near the Harlan Ranch and Diamond Crest communities, specifically:

• The approximately 7-acre parcel at or near DeWolf Avenue and Richmond Avenue, and

• The approximately 4.5-acre parcel on the opposite side of DeWolf Avenue, near the DeWolf Avenue dead-end at Owens Mountain Parkway

(APNs to be confirmed by the City under the Infill Rezoning Program).

The proposed rezoning would allow high-density residential development of 20–30 units per acre, with buildings up to three stories, potentially introducing up to 345 additional households into an area that is already operating beyond reasonable infrastructure capacity.

Traffic, Safety, and CEQA Concerns

The existing roadway network—including DeWolf Avenue, Richmond Avenue, and Owens Mountain Parkway—is already congested, heavily parked, and unsafe for pedestrians. The addition of hundreds of new residential units would constitute a significant traffic impact under CEQA standards, particularly with respect to:

• Increased vehicle miles traveled (VMT)

• Reduced pedestrian and cyclist safety

• Emergency vehicle access constraints

• Cumulative impacts when combined with existing development

Children in the surrounding neighborhoods already face unsafe conditions crossing these streets. Approving this rezoning without meaningful traffic mitigation would knowingly increase the risk of injury or loss of life.

School Overcrowding

Elementary schools serving this area are already overcrowded and operating near or above capacity. The City cannot reasonably approve additional residential density without corresponding school infrastructure expansion. Failure to address this creates a foreseeable and significant public service impact.

Lack of Parks and Open Space

The neighborhoods surrounding these parcels consist of hundreds of homes with no nearby public park or usable green space. These parcels represent one of the last remaining opportunities to provide recreational space for children and families in this area. Converting this land to housing permanently eliminates that opportunity and undermines the City's obligation to provide balanced, humane development.

Request for Alternative Use

I respectfully but firmly request that the City of Clovis:

1. Deny the proposed residential rezoning, and

2. Designate these parcels for park, open space, or recreational use, consistent with responsible planning, public safety, and long-term community well-being.

Rezoning this land for additional housing instead of park use would intensify congestion, endanger children, overburden schools, and degrade quality of life. This outcome would be inconsistent with sound planning principles and the City's duty to protect its residents.

Thank you for considering this formal objection and the long-term consequences of this decision.

Sincerely,

Joyce Okeafor

Joyce Okeafor
Clovis, California
[redacted]

Date: January 17, 2026

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

Re: Formal Objection to Proposed Infill Rezoning and Request for Park Designation

This letter serves as a formal objection to the proposed infill rezoning of parcels located at DeWolf Avenue, Richmond Avenue, and Owens Mountain Parkway near the Harlan Ranch and Diamond Crest communities. The proposed development would add up to 345 residential units to an area already experiencing severe traffic congestion, school overcrowding, and lack of public park space. Existing roadways are unsafe for pedestrians, particularly children, and schools are operating at or beyond capacity. These parcels represent one of the last remaining opportunities to provide much-needed green space and recreational areas for hundreds of surrounding homes. Rezoning for additional housing would permanently eliminate this opportunity and exacerbate existing safety and infrastructure challenges. I respectfully request denial of the rezoning proposal and designation of this land for park or open-space use in alignment with responsible urban planning and community well-being. Respectfully,

Joyce Okeafor

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, January 21, 2026 3:48 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Annette Gettman
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Salem Avenue, Clovis
textarea-1755209560293 = I understand that the infill project needs to be done. That said, I am highly disappointed that the City would choose two parcels in the same area (literally across the street from each other) accounting for nearly 25% of the required units to satisfy the lawsuit. It seems our area is having to absorb more than its fair share.
There is already a lot of traffic in the area; adding so many units will make it unimaginable, especially since they will be located at the main entrance/exit of the neighborhood.
Additionally, there are two other parcels up for sale on Owens Mountain Parkway, just down the street from the parcels chosen. What are they zoned for? Do we need to worry about even more traffic, etc. in this small area?
It is very disappointing that the city would make this type of decision without any input from the residents of the area and the impact that it will have on us. Having an “informational” meeting to announce this is what has been decided and basically there is nothing we can do about it is unbelievable. I am proud to live in Clovis and have always supported (without question) whatever the City (and schools) have on the ballot; thinking the city officials know what is best for our wonderful City – unfortunately, my opinion has now changed.

[redacted]

McKencie Perez

From: Amy Hatcher
Sent: Monday, February 2, 2026 6:03 PM
To: McKencie Perez
Subject: Fw: Strong Opposition to Rezoning Lots 157 and 197 in the Infill Rezone Program

Just making sure you have this.

Amy

Get Outlook for iOS

From: Susan Thompson <[redacted]>
Sent: Thursday, January 15, 2026 4:33:28 PM
To: Amy Hatcher <ahatcher@clovisca.gov>
Cc: aaronim@clovisca.gov <aaronim@clovisca.gov>
Subject: Strong Opposition to Rezoning Lots 157 and 197 in the Infill Rezone Program

Dear Commissioner Hatcher,
I am writing as a concerned resident of Clovis to urge you to recommend denial of the proposed rezoning for Lots 157 and 197 as part of the City's Infill Rezone Program. While I recognize the legal obligations stemming from the Desiree Martinez v. City of Clovis settlement to accommodate additional housing capacity, I believe these specific parcels are poorly suited for high-density (R-3 or R-4) rezoning and would impose disproportionate harms on the surrounding established neighborhoods.
The Infill Rezone Program targets underutilized parcels to help meet state housing requirements by redesignating them for high- and very high-density residential uses. However, approving rezoning for Lots 157 and 197 would fundamentally change the character of the nearby single-family residential areas. These neighborhoods have long been defined by low-density homes, providing a sense of openness, privacy, and community cohesion that residents value highly. Introducing multi-family developments here would erode this suburban character, increase noise and activity levels, and create an incompatible transition that disrupts the established fabric of the area.
Traffic concerns are particularly acute for these lots. Their proximity to major thoroughfares and freeway access points means rezoning to high density could funnel significantly more vehicles into already congested residential streets. This influx would worsen peak-hour backups, heighten risks to pedestrians and children, and strain local roadways not designed for such volumes. Without assured major infrastructure improvements, these changes would degrade quality of life and safety for current residents.
Moreover, rezoning these specific parcels would contribute to an unfair concentration of high-density housing in certain parts of Clovis. The program includes 20 sites citywide, but approving Lots 157 and 197 would place an outsized burden on the neighborhoods immediately adjacent to them, while other areas remain less affected. This uneven distribution exacerbates inequities, overburdening local schools, parks, utilities, and emergency services in already impacted zones.
Additional issues include potential strains on infrastructure—such as water, sewer, and schools—that may not readily scale to support hundreds of new residents per site. Environmental effects, including loss of open space and increased stormwater runoff or pollution from denser development, further weigh against approval. Property values in surrounding homes could also suffer, impacting longtime homeowners' equity and the overall stability of the community.
I respectfully ask that you, as a representative on the Planning Commission, carefully consider these site-specific impacts and recommend against rezoning Lots 157 and 197. Alternatives, such as prioritizing other parcels with better compatibility or lower-density options where feasible, would better balance housing needs with neighborhood preservation.
Thank you for your time and dedication to thoughtful planning in Clovis. I would welcome the opportunity to discuss this further and can be reached at [redacted]. Please keep me updated on the status of the Infill Rezone Program and any upcoming hearings.

Sincerely,
Susan Thompson[redacted] Enterprise AvenueClovis, CA. 93619

McKencie Perez

From: Amy Hatcher
Sent: Monday, February 2, 2026 6:04 PM
To: McKencie Perez
Subject: Fw: Infill Rezone Program

And another one!
Amy

Get Outlook for iOS

From: Judy Cornaggia <[redacted]>
Sent: Thursday, January 29, 2026 8:51:17 AM
To: Amy Hatcher <ahatcher@clovisca.gov>
Cc: aaronim@clovisca.gov <aaronim@clovisca.gov>
Subject: Infill Rezone Program

Judy Drilling

3495 Richmond Ave.

Clovis, CA 93619
[redacted]

January 29, 2026

Commissioner Hatcher

1033 Fifth Street
Clovis, CA 93612

RE: Opposition to Rezoning Sites Harlan Ranch #157 & #197 – [Infill Rezone Program]

Dear Commissioner Hatcher,

I am writing to formally express my strong opposition to the proposed rezoning of **sites 157 & 197** from Single-Family Residential to High-Density Multi-Family. As a resident of Harlan Ranch living directly across from the site, I am concerned that this development is inconsistent with the neighborhood's character and the City's Comprehensive Plan.

My opposition is based on the following material impacts:

- **Infrastructure Strain:** Our current water, sewer, and stormwater systems are already under pressure. Adding high-density housing will exacerbate these issues and may lead to increased maintenance costs for current taxpayers.
- **Traffic and Pedestrian Safety:** Dewolf, Richmond Avenue, and Pamela are not designed to handle the surge in traffic and parking issues this development would generate. I am specifically concerned about the safety of children and elderly residents who walk in this area.

- **Neighborhood Character and Privacy:** The proposed height and scale of this building are incompatible with the existing low-density homes. Multi-story units will directly overlook my private yard, significantly diminishing the quiet enjoyment of my property.
- **School Overcrowding:** Local schools are already at or near capacity. The influx of residents from this high-density project will create a burden that current facilities cannot support.

While I understand the need for housing growth, I urge the Planning Commission to reject this specific rezoning request and instead explore locations where high-density infrastructure is already in place. In addition, Harlan Ranch home buyers were promised access to commerce in this location by the plan developers when purchasing homes in this community.

Thank you for your time and for considering the long-term impact this decision will have on our community.

Sincerely,

Judy Drilling

McKencie Perez

From: Amy Hatcher
Sent: Monday, February 2, 2026 6:04 PM
To: McKencie Perez
Subject: Fw: Clovis Infill sites #157 & #197

Last one!
Amy

Get Outlook for iOS

From: JC D <[redacted]>
Sent: Friday, January 30, 2026 3:40:39 PM
To: Amy Hatcher <ahatcher@clovisca.gov>
Subject: Clovis Infill sites #157 & #197

Hello City Commissioner Hatcher,

My name is Jennie Daly and I am a homeowner of Harlan Ranch, I have been following the information that has been made public regarding the infill rezone program for “high and/or very high density” affordable housing. We have been obtaining detailed information from other homeowners in the area who have taken time to do their research. So far it seems as if the parcels near Harlan Ranch (site# 157 and site# 197) have not been well thought out as to how it would impact our community and school system.

First and foremost, being that we are home owners in one of the highly esteemed and well kept neighborhoods in Clovis, we would hope that the City of Clovis would try to maintain the value of our community and make sure that any rezoning project would take that into account. High density housing will cause increased traffic coming off of the 168 which will greatly impact the flow on the single turn-lane onto DeWolf. The inevitable increase in population will also impact the facilities/parks at Harlan Ranch (which are financially maintained by the HOA, but yet are open to the public). This does not seem fair to the homeowners who pay into the HOA. Additionally, It is a known fact that with low-income housing comes several community struggles such as higher crime rates, more substance misuse in the area, and other unwanted activity in the neighborhood. Although inclusion is always welcome, we hope that this change in affordability does not allow people (that may potentially have different standards) to diminish the caliber that we uphold for the Harlan Ranch area.

Furthermore, how would this affect the population capacity of Bud Rank Elementary? And how would it potentially effect the academic level that Bud Rank currently maintains?

Another thought that has come up during homeowner discussions (if apartments are definitely going to happen), is the possibility of senior living apartments. This would avoid the impact on traffic, school, and crime. Has that been a topic of discussion?

Thank you,
Jennie Daly

Clovis resident of Harlan Ranch and physician at Valley Children’s Hospital.

McKencie Perez

From: Amy Hatcher
Sent: Thursday, February 5, 2026 7:17 PM
To: McKencie Perez
Subject: Fw: Rezoning of Sites 157 & 197

Here is another one I just got. Let me know if you don't need copies of these.

Thanks
Amy

Get Outlook for iOS

From: Barbara Hioco <[redacted]>
Sent: Thursday, February 5, 2026 1:56:10 PM
To: Amy Hatcher <ahatcher@clovisca.gov>
Cc: aaronim@clovisca.gov <aaronim@clovisca.gov>
Subject: Rezoning of Sites 157 & 197

February 5, 2026

Dear Commissioner Hatcher,

We are writing to formally express our strong opposition to the proposed rezoning of sites 157 & 197 from Single-Family Residential to High-Density Multi-Family. As residents and property owners within 800 feet of the proposed sites, we are concerned that this development is inconsistent with the neighborhood's character and the City's Comprehensive Plan.

Infrastructure Strain: Our current water, sewer, and stormwater systems are already under pressure. Adding high-density housing will exacerbate these issues and may lead to increased maintenance costs for current taxpayers.

Traffic and Pedestrian Safety: Dewolf, Richmond, and Quincy Avenues are not designed to handle the surge in traffic and parking issues this development would generate. We are specifically concerned about the safety of children and elderly residents who walk in this area. A pedestrian/bike trail crosses both Richmond and Quincy. Quincy has no stop signs, nor speed bumps nor flashing lights to slow traffic. There are only two speed limit signs on Quincy (one in each direction), neither of which can be easily seen by traffic entering from DeWolf or Locan.

Excessive Traffic &. Speeding in Residential Neighborhood: When the neighborhoods bordered by Richmond and Quincy were built, a group of concerned residents met with City of Clovis personnel regarding the traffic and excessive speeding occurring on the two streets. The City noted that the excessive speeds recorded were within an acceptable range, i.e. 15 mph above the 25 mph speed limit. This was an unacceptable answer. Drivers continue to travel well above the 25 mph speed limit. This will only continue to get worse with the added traffic from the proposed multi family, high density projects.

Neighborhood Character and Privacy: The proposed height and scale of these projects are incompatible with the existing low-density homes. Decisions to live in this area were based on the existing zoning. If purchasers knew that a zoning change of this significance would be made, decisions to invest in this area most likely would not have been made. It is not fair to residents who have made significant investments in their properties.

Overcrowding: Local schools are already at or near capacity. The influx of residents from this high-density project will create a burden that current facilities cannot support. While we understand the need for housing growth, we urge the Planning Commission to reject this specific rezoning request and instead explore locations where high-density infrastructure is already in place. In addition, home buyers were promised access to commerce in this location by the plan developers and confirmed by City representatives when purchasing homes in this community.

Thank you for your time and for considering the long-term impact this decision will have on our community.

Sincerely,

Barbara & August Hioco
[redacted] Maine Avenue, Clovis, CA 93619

McKencie Perez

From: Renee Mathis
Sent: Monday, February 9, 2026 11:41 AM
To: McKencie Perez; George González
Subject: FW: Infill Court Decision (Dez Martinez v. City of Clovis) Court-Mandated Housing Program

FYI

Renee Mathis
Director of Planning & Development Services
Office: 559-324-2351
ReneeM@clovisca.gov

From: Briana Parra <brianap@clovisca.gov>
Sent: Monday, February 9, 2026 9:49 AM
To: Renee Mathis <ReneeM@clovisca.gov>
Subject: FW: Infill Court Decision (Dez Martinez v. City of Clovis) Court-Mandated Housing Program

Sharing this with you.

Briana Parra
City Clerk
Office: 559-324-2060
brianap@clovisca.gov

From: Rebecca Simonian <rebeccas@clovisca.gov>
Sent: Monday, February 9, 2026 9:46 AM
To: Briana Parra <brianap@clovisca.gov>
Subject: FW: Infill Court Decision (Dez Martinez v. City of Clovis) Court-Mandated Housing Program

Comment sent to all Council:

Rebecca Simonian
Executive Assistant
Office: 559-324-2060
rebeccas@clovisca.gov

From: Grace Nelson <[redacted]>
Sent: Sunday, February 8, 2026 9:04 AM
To: Vong Mouanoutoua <vongm@clovisca.gov>; Diane Pearce <dianep@clovisca.gov>; Matt Basgall <mbasgall@clovisca.gov>; Lynne Ashbeck <lynnea@clovisca.gov>; Drew Bessinger <drewb@clovisca.gov>
Subject: Infill Court Decision (Dez Martinez v. City of Clovis) Court-Mandated Housing Program

Dear Ladies & Gentlemen:
I have been made aware of the Infill Court Decision (Dez Martinez vs. City of Clovis) that may directly affect me and my community in Clovis, CA, and more specifically Harlan Ranch, which is directly across the street from the potential rezoning project(s). As part of this effort, the City of Clovis has identified 20 properties for potential rezoning to R-3 (medium-high density residential), with a few sites proposed as R-4:

•• Site 115: Approximately 7 acres located at the southwest corner of Harlan Ranch, proposed to be rezoned to R-3, allowing up to 30 units per acre and three-story apartment development.
•• Additional nearby property: The northwest corner of Owens Mountain Parkway and DeWolf Avenue, immediately west of an existing home, is also proposed for R-3 zoning.

If this rezoning occurs, and the housing developments are built, it will greatly affect me and my community.

One option that has been discussed by me and other residents of Harlan Ranch is that any development at these sites be restricted to senior housing, which could help mitigate several potential impacts, including:

• Reduced traffic congestion
• No impact on local schools
• Lower demand on community amenities by non-residents
• Addressing the current shortage of senior housing in Clovis

Please consider building senior housing, above anything else, in the above-described locations.

Thank you for your attention,
Concerned Clovis, CA, Resident, Grace Nelon ([redacted])

2-1-26

To whom it may concern,

It has come to my family's attention that the outcome of Dee Martinez vs. City of Clovis was ruled against the city's favor. As a result, two lots near Harlan Ranch are being considered for construction of affordable housing.

I implore you to please reconsider these sites.

Nearby schools are already strained at capacity even with recent re-zoning not to mention this would likely have a negative impact on the quality of education. The traffic is manageable at rush hour but would become overwhelming. My family's last concern is the inevitable loss of property value to our home. I have worked tirelessly and sacrificed financially to finally be able to afford a home in one of the most well known and safest communities in the city. This proposal would either force us to leave where we finally found a safe neighborhood or, watch the value of our home decrease to a price much lower than we bought it for. I understand action must be taken by the city but, please reconsider utilizing these sites near Harlan Ranch to help protect the reputation of one of the city's most desirable, clean, and safest communities intact.

Regards,

Eric Tayian [redacted] N Regent 93619

McKencie Perez

From: Paul Halajian <[redacted]>
Sent: Tuesday, February 17, 2026 4:28 PM
To: McKencie Perez
Subject: Affordable housing in Clovis

McKencie:

I hope this finds you well.

I'm contacting you regarding the controversy regarding the proposed site for affordable housing at Owens Mountain and DeWolf Avenue. I live in Harlan Ranch and attended a Homeowners Association Board Meeting a few weeks ago where a resident made a presentation on this subject. I've been thinking about this since then and I wanted to share some thoughts with you regarding this controversial matter.

As an Architect, my firm has designed several affordable housing projects throughout the Valley. At the moment, we have a 4-story, (114) unit project under construction at the corner of Blackstone and Dakota in Fresno, a 3-story (80) unit project in Visalia, and we are just starting the renovation of an affordable senior housing project in Exeter. We are well-versed in this typology and understand the financial, political and development challenges associated with affordable housing. Furthermore, I am a proponent of affordable housing to address the daunting economic and social difficulties Californians face – including residents of Clovis. I wholeheartedly support the development of affordable housing in Clovis and believe that well-designed affordable housing can benefit the city as a whole.

From my work in the affordable housing marketplace, I have learned that site selection is one of the most critical issues contributing to a successful affordable housing development. Affordable housing necessarily relies on an infusion of public funding in the form of grants or tax credits to bridge the gap between a non-viable project and a viable one from a development standpoint. To be competitive in pursuing grant funding from the State of California, a site must meet the needs of its residents. The most competitive sites share the following qualities:

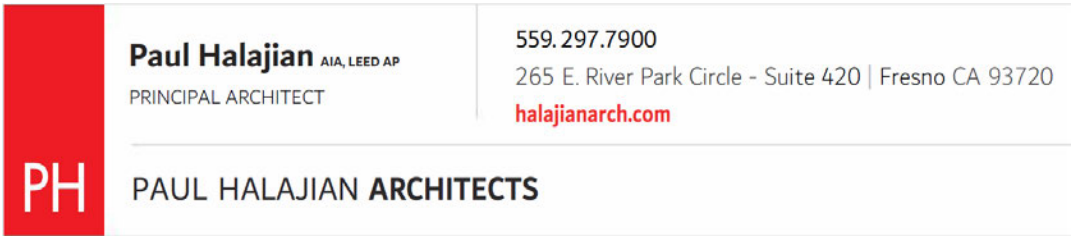
- served by mass transit
- connected to walkable/bikeable neighborhoods
- contribute to the creation of "complete streets"
- provide access to amenities (work, services, parks, schools, entertainment, etc.) without reliance on an automobile

The State places a high value on resilient, sustainable sites, preferring more urbanized locations over suburban areas that lack many of the attributes that support residents. A good example of this is our project at Blackstone and Dakota in Fresno. This project is situated on Fresno's Bus Rapid Transit (BRT) line that traverses the urbanized Blackstone Avenue Corridor. The BRT will connect resident of our project to downtown Fresno, Riverpark, and the new Fancher Creek commercial/retail center at Clovis Avenue and Tulare as well as schools, shopping, entertainment, work, etc.

Due to its location on the far edge of development in Clovis, removed from the services and amenities needed to support affordable housing, this reality suggests that a Harlan Ranch site would not be competitive for grant funding and would likely not be realized. While I welcome a mix of housing typologies in "my backyard", from experience, I believe that the Harlan Ranch site identified by the city for affordable housing would be passed over, and available funding would go towards sites proposed by other urban centers.

I encourage the city to identify sites better suited to creating affordable housing projects that meet the day-to-day needs of future residents. I'm more than willing to help the City of Clovis in any way I can, to meet this challenge. Please feel free to contact me if I can be of any service.

Best regards



McKencie Perez

From: Maria Spera <[redacted]>
Sent: Thursday, February 26, 2026 2:02 PM
To: George González; McKencie Perez
Cc: Renee Mathis; JASWANT BASRAON; Dirk Poeschel; Joyce Roach
Subject: Third Request – IRP Removal for 1933 Alluvial Ave.

Good afternoon George and McKencie,

After further discussion regarding the project constraints, my client, Dr. Jaswant Basraon, has requested that the subject property be removed from the Infill Rezone Program as soon as possible. This correspondence serves as our third formal request for removal from the program.

Please advise on what steps, if any, are required on our end to facilitate and confirm removal from the program. Additionally, we would appreciate notification on when the Infill Rezone Program is anticipated to proceed for review before the Planning Commission and City Council.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Best,

Maria Spera | Associate Planner
Land Development Services, Inc.
[redacted] Van Ness Ave., [redacted]
Fresno, Ca. 93721
Phone: [redacted]
[redacted]

McKencie Perez

From: Jason Horg <[redacted]>
Sent: Sunday, March 29, 2026 3:50 PM
To: McKencie Perez
Subject: Infill Rezone Program

Dear Deputy City Planner Perez,

I hope this email finds you well. I have been meaning to write you for some time now in regards to the Infill Rezone Program. Unfortunately given the busy nature of the year end with both the holidays and business, I like many was unable to attend the December meeting. I heard from a neighbor recently that there was an additional meeting held in February, but I was never informed unfortunately as I would have attended.

Our neighborhood, which is the Wilson Windsor development just west of DeWold and North of 168, were in the very middle of the recent CUSD redistricting and zoning mess a year or two back. My proposal, along with a few other similar proposals, was actually used in the final draft of that decision. I was shocked that CUSD was truly listening and looking for solutions, and realized just how sincere they were when Norm Anderson reached out to me to discuss my ideas and inform me they were using it. The reason I bring this up is because the same concerns that stopped CUSD from making changes to our area are still present in the proposal to build high density housing here.

Our traffic and roads present a major problem in the area. Because there is no road that runs cleanly or completely from East to West from Harlan Ranch area to Temperance or further west except Shepherd, everyone who lives in Harlan Ranch already uses our small residential streets to travel through the neighborhood, which causes all kinds of traffic and safety issues. This was well documented in the redistricting as a problem, including impact and speed limit test being done by the city, with discussion of speed bumps and other measures. DeWolf is a major problem as well given the setup currently, with constant traffic problems, and poor planning for the current amount of homes. The other common issue, and main issue, is we already have schools highly impacted from all of the building in the area. This was what got our area in a round of heated board meetings. Dry Creek is ridiculously impacted currently. I can't imagine how adding ultra high density housing such as apartments would possibly work in this area. We already have quite a bit of high density housing in an entire section of Harlan Ranch right across the road from us, the smaller homes without the yards and condensed properties.

As a Clovis homeowner and tax payer, I was not pleased to find out that children in our area were being pushed to other schools, while other kids not from the area were simultaneously being bussed in. I am all about people having equal access to education, but you can't accomplish this by punishing the children in the area whose families pay the taxes that support those schools, and would not be possible without. We could have bought the same home we worked hard to buy here for quite a bit less in neighboring CUSD school areas, such as Clovis West or Clovis East, but we worked hard and wanted to live here. The majority of the reason it has taken so long for me to reach out is because of the long hours I work to be able to pay for our home and the taxes that go with it. That is a choice we made as a family. I am well aware of the California and Federal housing rules, but don't agree with them. Look, I feel that I deserve to live on a golf course on the coast because my and my family's health is impacted by the valley air quality with allergies and asthma, and golf would help me relax, but no one is going to make that happen for me. I have to make that happen for me. We all have wants and feelings, but

unfortunately that is not how the world works. If you keep doing this to your tax paying residents, eventually you will have no revenue with which to pay for this city, the employee salaries, or the school district. I can't tell you the number of neighbors and friends who I have had conversations with that feel this very way. They all say the same, if this is what is going to happen, it is time to leave the area and probably the state. The novel Atlas Shrugged was a powerful warning from historical experience against this type of behavior.

I appreciate you taking the time to consider my concerns and suggestions. I would be happy to discuss and expand if you would like to set up a time to talk. Thank you for your time and attention to this matter. Have a great evening!

Sincerely,

McKencie Perez

From: noreply@revize.com
Sent: Sunday, April 26, 2026 8:58 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = David Zoldoske
text-1755209464120 = [redacted]
text-1755209498255 = 878 N Whittier Avenue
textarea-1755209560293 = Mr. McKencie, my property shares a common fenceline with the proposed high density development (#63) near Alluvial and Fowler Avenue - I have two questions, first has there been any direct discussion with owner about developing the property into apartments? and second, does the review process allow for public comments before the project would be approved? If so, what does that process look like?
Thank you for time and consideration
regards
David Zoldoske
Client IP = 76.137.216.252

Date: 4/27/2026

To: City of Clovis
Planning Department
McKencie Perez
Deputy City Planner | MPA

From: David Zoldoske, Homeowner

Subject: Planning Infill Rezone Concerns (Site ID 63-APN 56303207)

Mr. McKencie Perez, as a homeowner directly affected by recent zoning changes, I would like to share my concerns and desired outcomes for any proposed projects as they move forward for consideration:

1) That defined boundaries for existing single-family homes and the proposed R3 project(s) should be separated by an appropriate fence constructed of brick or similar material,

2) The height of said fence should be of sufficient height to provide a level of privacy and security expected in single-family homes (e.g. 7 to 8 feet, with 8 feet being preferable),

3) There should be sufficient setbacks from the fence line for any new structures so as not to cause a visual concern or annoyance,

4) Finally, and perhaps most importantly, any multi-story structurers facing existing properties and backyards SHOULD NOT have windows or balconies inundating the privacy of existing backyards of single-family homes.

I want to thank you in advance for your time and consideration in this important matter.

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, May 6, 2026 10:29 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Susan Colby
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Hughes Ave., Clovis, CA 93612
textarea-1755209560293 = We are very much OPPOSED to rezoning area 108 for multi housing structures. It is a small area with a bank and office building close. Furthermore, with the auto sales businesses going in across the street, the traffic on Clovis Ave will already be multiplied. Behind the proposed area are homes that have been there for 45 years. It is a well established neighborhood, very calm and quiet. Those that have homes that line up to the proposed property will suddenly have to start worrying about potential people coming over fences, debri, noise, etc. We already have a very disruptive person living on Clovis Ave (code enforcement is fining) for their space and disruptive behavior. Please do not approve this area for multi level low income housing. It will very likely drop the property values of the neighborhood also.
Client IP = 146.75.154.0

McKencie Perez

From: Christopher Valadez <[redacted]>
Sent: Thursday, May 7, 2026 6:39 PM
To: McKencie Perez
Subject: Public Comment on the Infill Rezone Program – Continued Opposition to Rezoning Sites Adjacent to Harlan Ranch (Specifically Site 115 and the Parcel at the Northwest Corner of Owens Mountain Parkway and DeWolf Avenue)

Re: Formal Public Comment on the Infill Rezone Program – Continued Opposition to Rezoning Sites Adjacent to Harlan Ranch (Specifically Site 115 and the Parcel at the Northwest Corner of Owens Mountain Parkway and DeWolf Avenue)

Dear Ms. Perez:

Thank you for the notification regarding the proposed Infill Rezone Program. As a homeowner and resident of Harlan Ranch (a master-planned community of over 1,500 single-family homes), I previously submitted written comments on February 3, 2026. I write now as continued formal public comment on the program in direct response to your notice, ahead of the May 28, 2026 Planning Commission hearing. I remain supportive of the City's efforts to comply with the *Martinez v. City of Clovis* judgment and the sixth-cycle Housing Element (certified December 2024), which require capacity for approximately 1,284–1,300 additional affordable units to address unmet lower-income RHNA obligations. However, I strongly oppose the proposed rezoning of peripheral sites adjacent to Harlan Ranch—specifically Site 115 (approximately 7 acres at the southwest corner, proposed for R-3 zoning allowing up to 30 units per acre and three-story apartments) and the parcel at the northwest corner of Owens Mountain Parkway and DeWolf Avenue—to high-density R-3 zoning. These sites are fundamentally incompatible with the area's character, infrastructure, and state planning priorities.2041

The City's own Infill Rezone Program documentation and the Housing Element describe these as "infill" sites, yet they fall far short of state definitions and preferences for true infill development. Harlan Ranch is a suburban, master-planned, low-density single-family community on the outskirts of Clovis, governed by a 2010 Master Plan and HOA CC&Rs that explicitly emphasize controlled density, family-oriented design, shared parks, playgrounds, and landscaping. Rezoning to R-3 (high-density, up to 30 du/ac with three-story buildings) would introduce an abrupt, incompatible scale—potentially 210+ units on Site 115 alone—that clashes with the neighborhood's low-density character and burdens HOA-funded amenities without proportional contribution from new residents.

These sites are **vehicle-dependent with limited transit**, resulting in high Vehicle Miles Traveled (VMT). Clovis Transit service in the eastern Harlan Ranch area remains limited (even with recent micro-transit additions), and residents rely heavily on personal vehicles for jobs, services, schools, and amenities. This directly contradicts HCD's *Sites Inventory Guidebook* best practices for lower-income RHNA sites, which prioritize proximity to transit, jobs, high-performing schools, healthcare, grocery stores, and amenities to promote walkability, reduce VMT, advance equitable housing, and support climate goals (consistent with SB 743). Peripheral edge locations like these score poorly on HCD suitability factors and fail to exemplify "true infill" as expanded under recent laws such as AB 130 (CEQA exemption for qualifying urban infill projects up to 20 acres) and SB 772 (expanding infill definitions to urbanized areas). In contrast, central/downtown parcels or those along major avenues better align with these mandates

and successful Clovis examples like Butterfly Gardens (supportive housing) and Solivita Commons (affordable family units).

Traffic and infrastructure impacts are already documented concerns. Owens Mountain Parkway, Shepherd Avenue, and nearby Highway 168/Owens Mountain interchanges experience peak-hour congestion and delays (exacerbated by events and growth), as noted in public comments, General Plan analyses, and media coverage of the program. Adding high-density units would worsen Level of Service, safety risks, and VMT without adequate mitigation. Local Clovis Unified School District schools serving the area face record enrollment pressures (approximately 43,000 students citywide) and capacity constraints, with new schools planned but not yet alleviating near-term strain from family-oriented units. These gaps undermine the legislative intent of the Housing Element Law (Gov. Code §§ 65580–65589.8) and *Martinez* requirements for adequate, suitable sites with realistic development potential (Gov. Code § 65583.2).

State law and the City's adopted plans require sites to be "adequate" and suitable, considering infrastructure, realistic capacity, neighborhood character, and Affirmatively Furthering Fair Housing (AFFH) principles. The 2010 Harlan Ranch Master Plan and General Plan prioritize low-density residential stability and family-oriented living in planned communities. Dense development here would undermine these policies, reduce quality of life for existing residents, and risk long-term incompatibility. Residents prefer—and the record supports—development that protects established neighborhoods while meeting housing goals.

Alternatives

I urge the City to:

1. **Prioritize more centrally located opportunity sites** from the Housing Element inventory (e.g., downtown or along major avenues). These better meet HCD criteria, reduce VMT, leverage existing transit/infrastructure, and align with AB 130/SB 772 infill preferences, minimizing legal and practical risks.
2. **If any peripheral/edge sites must be used**, restrict rezoning and development to **senior or age-restricted housing** only. This would address Clovis's senior housing shortage, reduce traffic impacts by an estimated 20–30% (fewer school/commute trips), eliminate school capacity strain, and lower demands on community amenities—fully consistent with HCD guidelines on special-needs housing and equitable distribution.

These alternatives are feasible, as the Housing Element identifies suitable central parcels and the program allows for tailored zoning/conditions. The City must fully evaluate them under state law to demonstrate compliance.

Risks of Under-Evaluating Alternatives

Selecting unsuitable peripheral sites without robust alternatives analysis exposes the City to significant risks:

- Further litigation or HCD findings of non-compliance (echoing *Martinez*, where inadequate zoning/density and site suitability led to the judgment).
- Delayed or unrealized affordable housing production.
- CEQA challenges, community opposition delays (already evident in public meetings), and infrastructure costs borne by taxpayers/residents.

- Undermining AFFH goals and efficient RHNA progress, potentially inviting enforcement actions under AB 1398 or related statutes.

A thorough record of alternatives analysis, traffic/school studies, and master-plan consistency review is essential to avoid these outcomes and ensure defensible, sustainable compliance.

I respectfully request that the City reconsider and exclude (or heavily condition) the Harlan Ranch-adjacent sites, prioritize truly suitable central infill alternatives, and provide a detailed written response addressing these points. This balanced approach will advance state mandates while preserving the character and livability of established communities like Harlan Ranch.

Thank you for your attention and for your service in balancing housing needs with community protection. I look forward to your response and continued public engagement.

Sincerely,

Christopher Valadez
Clovis, CA 93619
Harlan Ranch Homeowner

McKencie Perez

From: Andrew Haussler
Sent: Monday, May 11, 2026 7:54 AM
To: McKencie Perez
Cc: Renee Mathis; George González
Subject: FW: Public Comment Submission

For the file.

Thanks

Andrew Haussler
City Manager
Office: 559-324-2060
andrewh@clovisca.gov

From: No Reply <noreply@civicplus.com>
Sent: Sunday, May 10, 2026 10:00 AM
To: Andrew Haussler <andrewh@clovisca.gov>
Subject: Public Comment Submission

Submitted by: Susan Thompson
Email Address: [redacted]

Commented on event: https://clovisca.portal.civicclerk.com/event/51/overview
If you are having trouble viewing the URL above, cut and paste the string into your browser window.

User comment: I am writing as a concerned resident of Clovis to urge you to recommend denial of the proposed rezoning for Lots 157 and 197 as part of the City's Infill Rezone Program. While I recognize the legal obligations stemming from the Desiree Martinez v. City of Clovis settlement to accommodate additional housing capacity, I believe these specific parcels are poorly suited for high-density (R-3 or R-4) rezoning and would impose disproportionate harms on the surrounding established neighborhoods. The Infill Rezone Program targets underutilized parcels to help meet state housing requirements by redesignating them for high- and very high-density residential uses. However, approving rezoning for Lots 157 and 197 would fundamentally change the character of the nearby single-family residential areas. These neighborhoods have long been defined by low-density homes, providing a sense of openness, privacy, and community cohesion that residents value highly. Introducing multi-family developments here would erode this suburban character, increase noise and activity levels, and create an incompatible transition that disrupts the established fabric of the area. Traffic concerns are particularly acute for these lots. Their proximity to major thoroughfares and freeway access points means rezoning to high density could funnel significantly more vehicles into already congested residential streets. This influx would worsen peak-hour backups, heighten risks to pedestrians and children, and strain local roadways not designed for such volumes. Without assured major infrastructure improvements, these changes would degrade quality of life and safety for current residents. Moreover, rezoning these specific parcels would contribute to an unfair concentration of high-density housing in certain parts of Clovis. The program includes 20 sites citywide, but approving Lots 157 and 197 would place an outsized burden on the neighborhoods immediately adjacent to them, while other areas remain less affected. This uneven

distribution exacerbates inequities, overburdening local schools, parks, utilities, and emergency services in already impacted zones. Additional issues include potential strains on infrastructure—such as water, sewer, and schools—that may not readily scale to support hundreds of new residents per site. Environmental effects, including loss of open space and increased stormwater runoff or pollution from denser development, further weigh against approval. Property values in surrounding homes could also suffer, impacting longtime homeowners' equity and the overall stability of the community. I respectfully ask that you, as a representative on the Planning Commission, carefully consider these site-specific impacts and recommend against rezoning Lots 157 and 197. Alternatives, such as prioritizing other parcels with better compatibility or lower-density options where feasible, would better balance housing needs with neighborhood preservation. Thank you for your time and dedication to thoughtful planning in Clovis. I would welcome the opportunity to discuss this further and can be reached at [redacted]. Please keep me updated on the status of the Infill Rezone Program and any upcoming hearings.

McKencie Perez

From: noreply@revize.com
Sent: Saturday, May 16, 2026 8:27 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Peggy Davis
text-1755209464120 = [redacted]
text-1755209498255 = PO Box 3615
textarea-1755209560293 = Dear McKencie Perez,
I am a resident of Bonaventure Mobile Home Park at 1724 Minnewawa, Space 213. I am well aware of the need for better low-cost housing. Having lived here since 2007, I have come to know mobile homes well and realize that there was a huge code change in 1980. Most of the mobile homes here were built before then.
One basic problem with MHs is that they are on inadequate foundations. Because the ground underneath settles over time, the house goes "out of level". The walls and flooring starts to rise and fall in different places. The walls can crack, the countertops can buckle or crack. My point is, "mobile" homes are fairly ridiculous things to put in!
Years ago, we had a manager, Randall Guerra, who took it upon himself to have a new home put in whenever the park 'inherited' a MH from someone who passed away with no provisions made and often, in arrears on monthly rent, so the space could be filled by the park and then the new house sold to a new resident. Unfortunately, the park owners no longer make that effort, so the place gets more rundown every year just because these old MHs get older. Covid took Randall and we miss him.
I urge you to think about manufactured housing in the city's Infill program, but NOT mobile homes. I do think this is one of the few areas in the country where MHs are not going to blow away due to tornadoes (yet). I would not live in a MH anywhere else. But a good manufactured home, on a solid foundation, solar-equipped and wheelchair accessible would definitely beat a MH any day. I think the city could do these in a park-like setting, with a manager, and a wellness program, and do very well.
I am a semi-retired CPA and very interested in the Infill Rezone Program. I wish you success in making these improvements to the city attractive and useful. There are so many people who cannot afford decent housing, but if they could -- if more were available -- would be productive families, contributing to the city.
Blessings to you.
Client IP = 73.220.186.183

DIRK POESCHEL
Land Development Services, Inc.
923 Van Ness Avenue, Suite 200 • Fresno, California 93721
559/445-0374 • Fax: 559/445-0551 • email: dirk@dplds.com

May 18, 2026

City of Clovis Planning Commission
1033 Fifth St.
Clovis, CA 93612

SUBJECT: Request for Removal from Infill Rezone Program - APNs 563-032-07

Dear Chair and Honorable Commissioners:

On behalf of my client, Dr. Jaswant Basraon, I respectfully request removal of his property, identified by APN 563-032-07, from the city's Infill Rezone Program. At the beginning of this process, my staff and I discussed with the city's planning staff development options that would meet city goals while creating a project compatible with the surrounding neighborhood. Many months ago, my client proposed the blending of densities between the subject site and the property immediately to the west, which is identified as an RHNA site. We were advised by city staff that density blending would not be allowed.

After several months of continued discussions regarding density blending and the anticipated revisions to the multifamily development standards applicable to the project, City staff advised that blending the densities of the two sites could be considered if my client agreed to deed-restrict a portion of the units for low-income housing. We did not receive confirmation of the required number of deed-restricted units until recently. At that time, we were informed that 66 low-income deed-restricted units would be required under the city's Housing Element, plus an additional undefined number of units for the new Mixed Income Zoning Ordinance (MIZO) requirement. The project concept under consideration would have yielded a total of 164 dwelling units.

After carefully reviewing the current multifamily development standards and the cumulative obligations under the city's Housing Element and MIZO, our client has determined that the project is no longer economically feasible. Dr. Basraon entered this process with the intent of delivering a thoughtfully designed and compatible residential development. However, the combined regulatory requirements make it financially impractical to move forward.

We have previously submitted two written requests to staff seeking removal from the Infill Rezone Program. With this letter, we respectfully reiterate that request and ask the Planning Commission's support this request.

Thank you for your time and attention to this matter. Please feel free to contact me if you need any additional information.

Sincerely,

[redacted]

Dirk Poeschel, AICP

cc: Dr. Jaswant Basraon

McKencie Perez

From: Manbir Gill <[redacted]>
Sent: Thursday, May 21, 2026 12:05 PM
To: McKencie Perez
Subject: Clovis infill rezoning

Good afternoon Ms. Perez
Rezoning two adjacent parcels, 157 & 197 will unduly affect the surrounding area as many residents having been waiting and bought with the hope that the commercial lot will eventually have a small grocery/convenience store and services. Please consider our humble request as it is a food desert out there and no barber shops etc either.

Please consider rezoning the already residential (low density) to high density while leaving the commercial as such. It will allow services that will well serve that area in the long run.

Warm regards
Manbir S Gill
[redacted]

Sent from my iPhone

KROLL & ASSOCIATES, LLC.
URBAN DESIGN COMMUNITY VISIONING

May 22, 2026

Clovis Planning Commission
1033 Fifth Street
Clovis, California, 93612

SUBJECT: Planning Commission Consideration of the Infill Rezone Program Sites 595, 596, 597.

Chairman and Members of the Clovis Planning Commission:

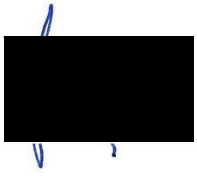
I represent Kenneth Crawford, owner of proposed Infill Rezone sites 595, 596 and 597. We support the redesignation and rezoning of the subject sites as proposed by Clovis' Planning and Development Services staff.

The Crawford family are longtime residents of the Clovis area and have owned portions of this site since 1985. They have maintained several rental houses there over the years and it has always been their desire to develop a quality independent senior residential village at this location. The proposed infill rezoning program recommended by staff will greatly assist in moving forward with this project.

We respectfully request that the Planning Commission support staff's recommendation in assigning R-4 (Very High Density Residential) Zoning to the subject sites.

Please feel free to contact me with any questions you may have.

Sincerely,



Dwight D. Kroll AICP, President

P.O. Box 1432 Clovis, CA 93613 | 559.289.1090 | krollandassociates@gmail.com | www.krollandassociates.com

McKencie Perez

From: noreply@revize.com
Sent: Saturday, May 23, 2026 6:16 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT

date-1745483708617 = 2026-05-28
text-1745483711071 = Government Code Section 65759 GPA 2024-003
text-1745483712599 = Rob Rahal
text-1745483713055 = [redacted]
textarea-1745483714111 = Concern here obviates a traffic pattern study. This may be included in the Environment Assessment, but is very important to the quality of life and potential increase in crime and potential need for Clovis Police and Sheriff patrol. Recommend that considerations for appropriate road widths and lanes be part of the assessment.
Client IP = 73.90.12.228

McKencie Perez

From: noreply@revize.com
Sent: Saturday, May 23, 2026 6:23 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT

date-1745483708617 = 2026-05-28
text-1745483711071 = R2024-002
text-1745483712599 = Rob Rahal
text-1745483713055 = [redacted]
textarea-1745483714111 = Consideration for the Environmental Assessment. With the Master Plan to re-designate and develop High Density and Multifamily High Density dwelling units, the potential for crowding and increase in potential crime rates. The need for increased Clovis Police and Sheriff patrols may be necessary. Also the potential the the esthetics in the community would be compromised.
Client IP = 73.90.12.228

McKencie Perez

From: noreply@revize.com
Sent: Saturday, May 23, 2026 6:29 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT

date-1745483708617 = 2026-05-28
text-1745483711071 = Government Code Section 65759 GPA 2024-003
text-1745483712599 = Rob Rahal
text-1745483713055 = [redacted]
textarea-1745483714111 = With the development of High Density Multifamily dwellings, what are the property tax implications. How will they be determined and by who. Also consider water usage for that many dwellings and whether or not the water levels could sustain that increase. There is also the upkeep of the common areas. That will be much more challenging. Thank you for your time.
Client IP = 73.90.12.228

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, May 27, 2026 8:23 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT

date-1745483708617 = 2026-05-28
text-1745483711071 = 3
text-1745483712599 = Ciarán Jones
text-1745483713055 = [redacted]
textarea-1745483714111 = Subject: Opposition: Clovis Infill Rezone Program - Sites 197 and 157
Dear Mayor Mouanoutoua, Honorable Members of the Clovis City Council, Members of the Clovis Planning Commission, and Deputy City Planner Perez,I am writing on behalf of my parents, Gerard and Sarah Jones, owners and residents at [redacted] Whiteash Ave ([redacted]), to express their strong opposition to the proposed rezoning of Site 157 and Site 197. These sites, located in northeast Clovis at the corners of De Wolf and Owens Mountain Parkway, are being considered under the Infill Rezone Program for High-Density Residential use (R-3). This email was also submitted as public comment for the May 28th session of the Planning Commission, which we were unfortunately unable to attend.We strongly urge the Planning Commission to remove Sites 157 and 197 from the Infill Rezone Program site list. Barring this removal, we urge the City Council to reject any rezoning plan that includes these proposed changes in zoning.The proposed rezone represents a jarring departure from the established vision set forth in the City of Clovis General Plan. These sites were never designed, intended, or structurally situated to absorb R-3 multi-family residential densities. Shifting from the existing mixed-use village and very low-density residential usage is a drastic change well beyond anything accounted for in the surrounding neighborhood design.The existing street infrastructure surrounding Sites 157 and 197 is not designed for and is incapable of safely handling the massive influx of traffic generated by high-density complexes. Intended primarily for low-density residential access, the local roads, intersections, and neighborhood streets are already constrained. In particular, the critical intersection at De Wolf and Owens Mountain Parkway is already heavily impacted. Upzoning these sites will trigger severe traffic congestion, peak-hour gridlock, and elevated safety risks for pedestrians and local cyclists. Dropping high-occupancy developments into an area lacking major arterial capacity is fundamentally irresponsible.Beyond these immediate traffic deficiencies, high-density zoning demands a robust network of supporting public infrastructure and nearby transit options. Placing R-3 zoning in this specific location will result in a massive increase to vehicle miles traveled (VMT), running in direct defiance to the intent of regional environmental goals and sustainable urban growth.Sincerely,Ciarán Jones
On behalf of Gerard and Sarah Jones
[redacted] Whiteash Ave, Clovis
Email: [redacted]
Client IP = 68.254.250.171

McKencie Perez

From: Ciaran Jones <[redacted]>
Sent: Wednesday, May 27, 2026 8:24 PM
To: McKencie Perez; Vong Mouanoutoua; Diane Pearce; Lynne Ashbeck; Matt Basgall; Drew Bessinger
Subject: Opposition: Clovis Infill Rezone Program - Sites 197 and 157

Dear Mayor Mouanoutoua, Honorable Members of the Clovis City Council, Members of the Clovis Planning Commission, and Deputy City Planner Perez,

I am writing on behalf of my parents, Gerard and Sarah Jones, owners and residents at [redacted] Whiteash Ave ([redacted]), to express their strong opposition to the proposed rezoning of Site 157 and Site 197. These sites, located in northeast Clovis at the corners of De Wolf and Owens Mountain Parkway, are being considered under the Infill Rezone Program for High-Density Residential use (R-3). This email was also submitted as public comment for the May 28th session of the Planning Commission, which we were unfortunately unable to attend.

We strongly urge the Planning Commission to remove Sites 157 and 197 from the Infill Rezone Program site list. Barring this removal, we urge the City Council to reject any rezoning plan that includes these proposed changes in zoning.

The proposed rezone represents a jarring departure from the established vision set forth in the City of Clovis General Plan. These sites were never designed, intended, or structurally situated to absorb R-3 multi-family residential densities. Shifting from the existing mixed-use village and very low-density residential usage is a drastic change well beyond anything accounted for in the surrounding neighborhood design.

The existing street infrastructure surrounding Sites 157 and 197 is not designed for and is incapable of safely handling the massive influx of traffic generated by high-density complexes. Intended primarily for low-density residential access, the local roads, intersections, and neighborhood streets are already constrained. In particular, the critical intersection at De Wolf and Owens Mountain Parkway is already heavily impacted. Upzoning these sites will trigger severe traffic congestion, peak-hour gridlock, and elevated safety risks for pedestrians and local cyclists. Dropping high-occupancy developments into an area lacking major arterial capacity is fundamentally irresponsible.

Beyond these immediate traffic deficiencies, high-density zoning demands a robust network of supporting public infrastructure and nearby transit options. Placing R-3 zoning in this specific location will result in a massive increase to vehicle miles traveled (VMT), running in direct defiance to the intent of regional environmental goals and sustainable urban growth.

Sincerely,

Ciarán Jones
On behalf of Gerard and Sarah Jones
[redacted] N. Whiteash Ave, Clovis
Email:[redacted]

McKencie Perez

From: noreply@revize.com
Sent: Friday, May 29, 2026 9:27 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Angela Collins Kismet
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Broadbent Ln
textarea-1755209560293 = I have serious concerns regarding a high density housing development being built at Owen's Mt. and DeWolf. This area cannot handle this type of development. Bud Rank Elementary cannot handle the additional students. Many of us purchased homes in this area for the low traffic and quiet neighborhood. Changes to this area will have many of us relocating.
Client IP = 50.147.117.18

McKencie Perez

From: noreply@revize.com
Sent: Friday, May 29, 2026 11:53 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Emily Hunt
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Sample Ave
textarea-1755209560293 = Just a quick question as I have not been part of this type of occurrence before. What happens with the homes that are in the infill rezone squares? Is the city at risk of not meeting the needs from the court ruling if those tenants decide not to sell?
Client IP = 76.20.90.97

McKencie Perez

From: Grace Nelson <[redacted]>
Sent: Saturday, May 30, 2026 7:42 AM
To: Vong Mouanoutoua; Diane Pearce; Matt Basgall; Lynne Ashbeck; Drew Bessinger; McKencie Perez
Subject: Re: Infill Court Decision (Dez Martinez v. City of Clovis) Court-Mandated Housing Program

Hello, All:
It was a great meeting on May 28, 2026. Thank you for all your efforts.
It seems clear that the rezoning will happen, but there's one topic I don't believe anyone brought up regarding the two lots located at De Wolf Ave. and Owens Mountain Parkway and that is to please consider building senior living above anything else, please.
Thank you for your attention, Grace Nelson.

On Sun, Feb 8, 2026 at 9:04 AM Grace Nelson <[redacted]> wrote:

> Dear Ladies & Gentlemen:
> I have been made aware of the Infill Court Decision (Dez Martinez vs. City of Clovis) that may directly affect me and my community in Clovis, CA, and more specifically Harlan Ranch, which is directly across the street from the potential rezoning project(s). As part of this effort, the City of Clovis has identified 20 properties for potential rezoning to R-3 (medium-high density residential), with a few sites proposed as R-4:
>
> •• Site 115: Approximately 7 acres located at the southwest corner of Harlan Ranch, proposed to be rezoned to R-3, allowing up to 30 units per acre and three-story apartment development.
> •• Additional nearby property: The northwest corner of Owens Mountain Parkway and DeWolf Avenue, immediately west of an existing home, is also proposed for R-3 zoning.
>
> If this rezoning occurs, and the housing developments are built, it will greatly affect me and my community.
>
> One option that has been discussed by me and other residents of Harlan Ranch is that any development at these sites be restricted to senior housing, which could help mitigate several potential impacts, including:
>
> • Reduced traffic congestion
> • No impact on local schools
> • Lower demand on community amenities by non-residents
> • Addressing the current shortage of senior housing in Clovis
>
> Please consider building senior housing, above anything else, in the above-described locations.
>
> Thank you for your attention,
> Concerned Clovis, CA, Resident, Grace Nelon ([redacted])

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 1, 2026 7:18 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT

date-1745483708617 = 2026-06-25
text-1745483711071 = June 25th agenda not yet posted
text-1745483712599 = Ankara Lee
text-1745483713055 = [redacted]
textarea-1745483714111 = Regarding the low income housing plans for Owens Mountain Parkway in Clovis near Harlan Ranch

I understand the city is reacting to a lawsuit against Clovis for the lack of mixed housing throughout the city

However the longterm impacts of mixing low income housing in areas of Clovis where we want to keep decades of future home buyers coming and being able to sell properties at their highest value is important. The short term gain of placing low incoming housing in this area will only have longterm negative impacts that will never rebound from this decision. What areas of Clovis are left where homes will continue to bring in higher property taxes to fund all the other projects as minimum wage to fix city still increase.

The planned low income housing may have plans to look nice and modern but ptoential homebuys will be deterred by it. I know there is new developments going up and those properties will lend money to the city but Clovis residents are proud to live here. The people will lose hope in the city and those people who make improtant decisions because the people aren't valued or heard.

Besides the quick resolution with negative outcomes - is there anything else that can be considered to keep high values to more homes (such as those in Harlan Ranch) and the spirit of the residents alive — where we want to care about how we treat our city and their neighbors?

Pretty soon this city will look like Fresno and no one ever says they want to move or live in Fresno

Can we possibly reserve this piece of land for senior citizen housing / community? Or small mom and pop stores (similar to Old Town Clovis) with housing located above the shops? I'm not too familiar with all the laws/etc - however are there any other avenues up for consideration?

Thank you for your time in reading this and I hope that there is something else we can do with this area
Client IP = 108.227.94.245

McKencie Perez

From: Rebecca Simonian
Sent: Wednesday, June 3, 2026 11:43 AM
To: McKencie Perez
Cc: Briana Parra
Subject: FW: Where do I start?

Good morning,

Please see the email below which should be included in your citizen comments for the July 6th meeting, for the Infill Rezone Program item.

Thank you,

Rebecca Simonian
Executive Assistant
Office: 559-324-2060
rebeccas@clovisca.gov

From: Alice Silverman <[redacted]>
Sent: Wednesday, June 3, 2026 9:19 AM
To: City Council <citycouncil@clovisca.gov>
Subject: Where do I start?

RE: Lot 72

We've lived on W Kenosha Ave for over 28 years. We remember when Willow and Nees were only 2 lanes and the corner of Willow and Nees was undeveloped. So we've seen a lot of change - mostly good. We're writing to share some history about Lot 72 as rezoning it to R3 or R4 would be disastrous to our neighborhood.

Lot 72 originally had just one home on it. When the owner passed away, the spouse sold it to the current owner, orthodontist. He told us from the beginning that he wanted to build a family compound on the land and shared his plans with us as he wanted to build and orthodontist building that contains office space as well. He went on about how being across from the Buchanan Complex would bring him a lot of business - all those teeth to straighten. Well, here we are many years later and it doesn't appear that the business is thriving at this location. He has several around the valley, we understand. Nor did the family compound ever get built.

In the meantime, we've had to contend with the parking lot noise, pop-up business on Saturdays, hour long clearing of the parking lot by the gardener using a handheld blower, smokers of all sorts (not just tobacco). A broken sprinkler on their side of the wall flooded our yard. We called the orthodontist office asking for help and were referred to the sprinkler installer whose business is up north and go no help. Long story short, they expected us to deal with it and offered no help. We never heard from the owner and eventually we contacted the county for help. A drone was sent out to verify the problem. They reported back that yes there was indeed a rupture but they couldn't help because the owner needed to deal with it. We had to turn off the sprinklers that were leaking and then their gardener turned them back on. Eventually it was fixed. It *only* took about 2 months. (Mind you this is when water was being rationed). The

orthodontist building has not been well cared for either. The lettering on the signs are coming down, the building itself is in need of paint - rust is visible, there was a cracked window that faced the street for several months. Landscape is mediocre at best.

The most problematic issues are the weeds/trash and mosquito problem. I've enclosed some photos of the field/yard that butts up to our yard and our neighbors yard. Mind you, their fence is wood and would more than likely, burn fast if it were to catch fire. We've had to contact weed abatement and the owner waits until the very last day before he's fined to take care of the issue. But the truth is he doesn't take care of the issue - he does piece meal fixes. He mows down the weeds on Peach across from the school. You know the stuff you can see. The renter of the home on the property mows his front "lawn" but not the rest of the yard that extends toward us. You'll see what we're mentioning in the photos. There is also a water valve (which is also in the photos) that leaks and so weeds continue to grow. Water pools which, you guessed it, grows mosquitoes. (Not sure this is owner's problem or city problem to fix).

The renters of the home on the property are relatives of the orthodontist and are nice neighbors. They've had problems with school children and some adults, trying to take a shortcut through their front yard to Kenosha. This might be the reason why they've not cleared the area (to discourage them - since it's a dangerous mess to traverse). There's also a broken down chainlink fence that they erected (it was not properly installed - just propped up) and fell within a few weeks. So, what remains is a true mess. The weeds grow out on to Kenosha in front of our home. We've tried to clean it up but it's a huge job. It would take tools we don't have.

It is now June 3rd, the deadline passed to clean up the weeds. Yesterday the large field was disced but not the mess near us. The owner hasn't been a good neighbor or corporate citizen and is now offering his 2 acres across from Garfield Elementary as property to develop into R3 or R4. His previous attempts to develop the land was met with stiff opposition by us, the homeowners. We are an established neighborhood. We deserve to be able to continue with the same and we need your help.

















McKencie Perez

From: noreply@revize.com
Sent: Sunday, June 7, 2026 3:24 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Claudia Aghoian
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] El Paso Ave., Clovis, CA 93611
textarea-1755209560293 = I am very concerned about the impact of this dense and low income housing on our schools that are already at capacity within the tight city limits. I value the high caliber public education Clovis offers and do not want to see that diluted due to overcrowding. In addition, I am concerned about the impact on traffic and pollution to our community. Since I am a home owner directly affected by this proposal, I am concerned about the type of housing, number of residences in the proposed housing and how this will affect my property value. I would appreciate further information about the use of these proposed parcels. I plan to attend the meeting June 23, 2026.
Client IP = 146.75.136.138

McKencie Perez

From: Suzan Blair <[redacted]>
Sent: Monday, June 8, 2026 5:45 PM
To: McKencie Perez
Subject: City Infill Rezone Program DeWolf and Owen's Mt Rd

I strongly oppose this project. The traffic is already heavy at peak times on Owen's Mt. We purchased this property due to its peacefulness and quiet neighborhood. We have been here just over seven years, and were told no high density housing/apartments would be built. The lack of crosswalks already puts children at risk. Is a new school going to be built? I can't imagine Bud Rank being able to accommodate the children in the high density housing. I am unable to attend June 23, but strongly voice my opposition.

Suzan. Blair
[redacted] Trenton Avenue
Clovis CA 93619
[redacted]
Suzan

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, June 10, 2026 6:49 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Scott Beckman
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Graybark Ave
textarea-1755209560293 = High density housing where there are no services for them. Not a bright idea. Small business and coffee shops a must. Would serve people enabling goals for master plan living. What ever happened to those goals???
Client IP = 108.71.99.67

McKencie Perez

From: Susan Colby <[redacted]>
Sent: Friday, June 12, 2026 8:27 AM
To: McKencie Perez
Subject: Parcel 108

Hello,

We are very opposed to the Infill Rezone Program in parcel 108. It is a small “L” shaped parcel of land, surrounded by banks, dental office and other professional buildings. Behind this property are homes in a very quiet establishment neighborhood with most residents being senior citizens. This parcel would need access on Clovis Ave, which is already over congested. Furthermore, across Clovis Ave you have approved 3 car dealerships, restaurants, etc which has already started building. One cannot even image the traffic issues that will be caused with that. Already people cut through the quiet neighborhood to avoid the lights and traffic on Clovis Ave.

Please DO NOT APPROVE this parcel of land for this project.

Thank you,

Susan Colby
[redacted]N Hughes
Clovis, CA

McKencie Perez

From: Rob <[redacted]>
Sent: Friday, June 12, 2026 2:36 PM
To: McKencie Perez
Subject: Property Owner informational Meeting Regarding The City's Infill Rezone Program

Good afternoon McKencie Perez, MPA, Deputy City Planner,

I'm not sure if I'll be able to make the meeting due to some health care concerns, but have a few questions and comments to pass on, if that is acceptable.

1. If I understand the *Martinez v. City of Clovis* court judgement correctly, the plaintiff is directing the City of Clovis to offer more "low-cost" housing to residents of the Central Valley, or those that may want to move here. The judgement directs the City of Clovis to conduct a search to contract with builders such as Wilson Homes to develop such housing to the tune of 1284 units. Rezoning to higher density means that there will be more units per zone at a lower cost to potential buyers. Is that about the long and the short of it? If so, what power do the current area owners have to interrupt that progress? Is this a meeting to satisfy a requirement? I'm interested in making sure I'm understanding the situation. Appreciate any feedback on that.

2. Being a retired military member and Veteran, I do have a few concerns, if this is the situation.

- Most of the residents of this area have worked hard and had to save to purchase a more expensive house. Bringing in lower-income housing would negatively impact that proposition.
- It appears that Wilson Homes and other builders are already breaking ground to build units. Are these the Very High Density dwellings you speak about in your notice? If this is the case, what are the options to curtail this development.
- I sent a previous note as a precursor to the previous meeting on May 28, 2026, but I'd like to reiterate that there should be some traffic evaluation and preparation prior to any development of new housing, be it low-income or regular developments prior to the work starting. I was stationed in San Antonio when new developments both residential and commercial were built around Lackland Air Force Base. This caused a lot of gridlock and caused the city to conduct reactive road widening and building after the fact. As you can imagine, this caused grief and traffic backups.
- Another concern is that when you increase the population in areas and, with all due respect, include low-income or as you refer to as Very High Density housing, the crime rate will increase. This will put a stress on the Clovis Police and Sheriff's Departments. Are they or will they be ready to withstand additional work patrols and potentially more crime in the area. Many of residents have settled here to get away from the high crime rate in other areas in the Central Valley.

I'm sure other residents have concerns as well. For the above and other reasons, I respectfully request that this court order be reevaluated to take the current residents in the area into consideration. Thank you for your time. Take care.

Respectfully submitted,

Robert Rahal, MPA, LFACHE
Concerned Veteran

[redacted] N. Whiteash Ave.
Clovis, CA

"For Leaders Who Care"

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 15, 2026 12:38 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ingrid O'Neal
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N De Wolf Avenue, Clovis, CA 93619
textarea-1755209560293 = Water availability is of the utmost concern with this proposed high-density rezone program. Any influx of users and consumers, whether they are on city water or on wells, will adversely impact the already depleted water table in this and surrounding areas.
Can the council please make an appeal to the administrators of the state housing requirements and of the court order, emphasizing the detrimental results of adding such a high-density population to the area? We are running out of water. Please, put an end to this.
Thank you.
Client IP = 146.75.136.66

McKencie Perez

From: Alma O'Neal <[redacted]>
Sent: Monday, June 15, 2026 12:40 PM
To: McKencie Perez
Subject: Clovis Infill Rezone Program

Dear Ms. Perez,

Water availability is of the utmost concern with this proposed high-density rezone program. Any influx of users and consumers, whether they are on city water or on wells, will adversely impact the already depleted water table in this and surrounding areas.
Can the council please make an appeal to the administrators of the state housing requirements and of the court order, emphasizing the detrimental results of adding such a high-density population to the area? We are running out of water. Please, put an end to this.
Thank you.
Ingrid O'Neal

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 15, 2026 4:37 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Richard Clymore
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] W Muncie Ave
textarea-1755209560293 = Did the City of Clovis put forth any effort in fighting this Martinez vs City of Clovis court judgement, or did you just roll over. Your proposal to put a 72 unit across from the Buchanan Complex is ignorant at best. In addition, has a study been done to determine by how much that is going to decrease the price of our homes in the development behind the proposed development? We didn't purchase our homes to be forced to have a low income development built next door. Also, traffic, which is already a problem in the morning and afternoon, is going to be much worse. I'm quite sure the neither the City Planner nor members of the City Council would appreciate the development placed in your neighborhood. Finally, since we are being forced into having this low-income apartment complex in our neighborhood, is the City of Clovis going to compensate us for the loss in value of our homes?
Client IP = 67.174.54.214

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 15, 2026 7:04 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Erin Crowe
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N Hughes Ave., Clovis, CA 93612
textarea-1755209560293 = Hello,

We are very opposed to the Infill Rezone Program in parcel 108. It is a small “L” shaped parcel of land, surrounded by banks, dental office and other professional buildings. Behind this property are homes in a very quiet establishment neighborhood with most residents being senior citizens. This parcel would need access on Clovis Ave, which is already over congested. Furthermore, across Clovis Ave you have approved 3 car dealerships, restaurants, etc which has already started building. One cannot even image the traffic issues that will be caused with that. Already people cut through the quiet neighborhood to avoid the lights and traffic on Clovis Ave.

Please DO NOT APPROVE this parcel of land for this project.

Thank you,
Client IP = 146.75.136.0

McKencie Perez

From: noreply@revize.com
Sent: Friday, June 19, 2026 9:25 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Chris Kalashian
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] W Vermont Ave
textarea-1755209560293 = This is concerning the parcel across the street from Garfield on Peach Avenue. I am asking for the city to reconsider this parcel as part of the rezone project. As the city has grown north, Peach Avenue has become much busier. More and more people are using it from Shepherd as opposed to using Minnewawa or Willow. When school is in session, this only amplifies the traffic. Must the city now add hundreds of people to this corner who will cause even more traffic and crowd an every growing area? Aren't there better places for this? Why add more people next to a school where cars are already an issue during the commuting hours and children are walking, biking, etc? In looking at the other parcels on this map, I don't see the surrounding area being impacted as much by the addition of hundreds of people and who knows how many additional vehicles. In addition to this, Fresno has changed the entire everyday life in this area by adding enormous apartment complexes all along Willow. This little area has disproportionately been impacted by the addition of many, many, multi unit developments in recent years and the impact on driving, parking, crowding, etc cannot be overstated. Will the city please reconsider adding another massive amount if people to an area that has already been impacted so greatly in recent years?
Client IP = 50.168.40.111

McKencie Perez

From: noreply@revize.com
Sent: Friday, June 19, 2026 3:01 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Tammy Vestal
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Oak Creek Road
textarea-1755209560293 = My property is 235 W Rialto and is adjacent to lot 110. I was wondering if I could get my lot rezoned? If at all possible? Any information would be appreciated. Thank You
Client IP = 140.248.20.66

McKencie Perez

From: noreply@revize.com
Sent: Sunday, June 21, 2026 7:54 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kayleigh Moranda
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N. Graybark Ave.
textarea-1755209560293 = Hello,

As a homeowner in the area I have deep concerns regarding this project. I have written into the city of Columbus many times regarding how fast people are driving down Quincy Avenue. It is a huge hazard two children inside a neighborhood when people are driving 35+ miles an hour in a neighborhood street because they are using it as a cut off because the city does not have any streets that are more accessible to get from Dewolf to Locan closer to the 168. The traffic down, Quincy remains dangerous and has not changed since many of my writings. Putting even more people in a complex right there would make traffic even worse unless the city does something about the roads. Also, there is nothing accessible out here, so it would be difficult for people who are living in these apartments or in a low income area to access shopping, food, jobs, especially if they are lacking transportation, being all the way out here. This location does a disservice to them if they lack transportation. My largest concern however is the danger on Quincy and this project will just make this far worse.
Client IP = 108.71.98.181

McKencie Perez

From: noreply@revize.com
Sent: Sunday, June 21, 2026 7:56 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kayleigh Moranda
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N. Graybark Ave.
textarea-1755209560293 = I forgot to mention in my prior submission that Dewolf is not set up for this type of traffic considering it is one lane each way as is Owens Mountain Parkway. This project would require significant road work and if not done, would cause major traffic issues on these roads as they are already plugged in the morning without more homes/apartments.
Client IP = 108.71.98.181

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 22, 2026 12:50 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = David Rete
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] E Alluvial Ave
textarea-1755209560293 = Not in favor of proposed sites. Water issues, crime issues and traffic issues are my concerns.
Client IP = 74.253.6.64

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 22, 2026 1:00 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Shirley Peracchi
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Tollhouse Rd. Clovis. Ca. 93719
textarea-1755209560293 = I oppose the building of low income housing and apartments. This will cause more congestion, noise and crime. What will happen to our wells. There is not enough water for all that building. This is country!
Client IP = 12.75.225.47

June 23, 2026

Dear Mayor Mouantoua and Council Members,

Planning for growth and development in an area should be guided by the following considerations: long-term sustainability of water, the environment, infrastructure, fiscal responsibilities, and the character of the community.

As California continues to face periodic drought conditions and uncertainty regarding the water supply, careful stewardship of natural resources becomes increasingly important. A priority should be to develop areas where infrastructure has already been planned and invested in. When possible, using existing water systems, sewers, roadways, and utility systems is likely to be more efficient and cost- effective than extending services into areas not originally intended for higher-density development.

Community character deserves thoughtful consideration. Many Clovis residents made long-term commitments in their homes based on adopted plans and the established nature of their neighborhoods. While communities inevitably evolve, proposed changes should be carefully evaluated to ensure they complement surrounding development and preserve qualities that make Clovis a desirable and attractive place to live.

It is our hope that the City of Clovis will maintain a strong commitment to public participation which includes early notification of meetings that avoid times when citizens are likely to be out of the area (like holidays). Trust and optimal outcomes are promoted when citizens are provided with meaningful and realistic opportunities for resident input and active participation. The overall quality of life should remain the key factor in planning.

Thank you for the opportunity to provide comments regarding current planning discussions in our community.

Thank you for your service to our community and for considering this request.

Could you please confirm the specified date and time these comments will be entered into the public record and become publicly available for review?

Sincerely,
Rural Clovis Residents

See signatures on following page(s) referenced to this letter.

Mail or Deliver to } Mayor Vong Mouanoutoua
1033 5th St.
Clovis, CA 93612

From: noreply@revize.com
Sent: Tuesday, June 23, 2026 6:13 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ross Miller
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Sunnyside Ave
textarea-1755209560293 = I'm concerned with a few elements of this plan:
1. What efforts were taken to ensure that the infill projects do not create an inequitable burden on low/lower income neighborhoods?
2. Will traffic studies be conducted for sites prior to development?
3. What will be done to ensure that noise and construction do not cause significant impacts to neighbors? The City recently repaved Sunnyside in the vicinity of three of the parcels that are being rezoned, which included vibrating drum rollers operating attachment to many houses between midnight and 5 AM
Client IP = 174.227.178.170

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, June 24, 2026 5:44 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Tyler Stjerne
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N MAINE AVENUE
textarea-1755209560293 = City Council & Planning Members Constituents,

I respectfully do not support the 2026 infill project that would get us "The City of Clovis" in compliance with the court judgement of Martinez v. City of Clovis.

*A yes vote does more than kick the can down the road appeasing a court mandate.

My wife, son & I moved to our Harlan Creek neighborhood for the "Clovis way of Life" and enjoy the opportunity to live in a quiet low density neighborhood almost four years ago.

My now 6 year old loves to ride his bike and we happily go to our neighborhood park "always using the crosswalk" as much as possible. He is the highest priority for my wife and I.

I'm concerned for his safety as well as all of all our neighborhood kids, runners & walkers as the infill project brings potentially hundreds of additional cars daily through our 25mph neighborhood streets when they weren't designed for that capacity. We already experience excessive speeding as surrounding master planned communities use the streets of Quincy, Richmond & Salem as cut throughs to get from DeWolf to Locan or the inverse. It was eleven years ago my wife and I lost our first born son who is buried at the Academy Cemetery nearby and his loss amplifies the fear of loosing another child or neighbor.

Again specifically speaking to site #197 within my "Very Low Density Residential" neighborhood rezoning would bring additional traffic through our residential 25mph street that includes a crosswalk midway for a pedestrian parkway path said street narrows to 24' from curb-to-curb. Prior to my family moving in some neighborhood advocates have been trying to ask the city to either reduce the speed limit, put in speed bumps or patrol the area to avoid a car vs pedestrian fatality. I don't believe a 24' width residential two way street is to code in a neighborhood. Referencing city code 9.66.090 Circulation standards I see 26' as the minimum. If aware of this specific concern and or issue & you pass this rezoning allowing more residential development resulting to higher traffic through this choke-point and some is seriously hurt or killed it would be lifechanging for everyone involved.

Other parcel sites that are proposed for this infill rezoning have similar traffic concerns as our current planning and development was designed many years ago for the existing zoning. Site #157 could additionally bring near two times the traffic through our streets on top of the hundreds from #197. This safety concern is my primary objection. Please vote no or at least help us slow the speeding cars down that blaze through our neighborhood.

Tyler Stjerne
Client IP = 12.7.53.218

McKencie Perez

From: noreply@revize.com
Sent: Friday, June 26, 2026 6:26 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Crystal
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] Soledad Ave
textarea-1755209560293 = Zone 115 poses future traffic issues and disturbance in an otherwise quiet neighborhood. The placement of multi-family units in that space, even if planned to regulation standards it's not the ideal place for multi family units. Zone 590 is the better option of the 2. Please reconsider the fact that Leonard is narrow, and is not able to accommodate the influx of traffic. As well as, the fact of inconvenience as a renter. I myself would prefer to live somewhere less compact and easier to get in and out of having to drive to work or the store everyday.

Client IP = 104.56.39.181

McKencie Perez

From: Jason Horg <[redacted]>
Sent: Sunday, June 28, 2026 7:27 PM
To: Vong Mouanoutoua; Diane Pearce; Lynne Ashbeck; Matt Basgall; Drew Bessinger
Cc: McKencie Perez
Subject: Infill Rezone Program and July 6th Public Hearing

Dear Mayor, Clovis City Council, and Deputy City Planner,

I hope this email finds you all doing well. I have been meaning to reach out the past several weeks, but like many in the area we live in, I am a busy professional and parent. I wished to take more time with this, but hopefully it will cover the pertinent issues. This email is in regards to the Infill Rezone Program and specifically the lots chosen by Harlan Ranch and Dry Creek area. We own a home within 800 feet of the property being proposed for the project so we were notified, and have attended a few of the Clovis Planning Department meetings, where I spoke at one.

The first issue I would like to point out is the recent Clovis Unified Boundary fight we went through just a year or two ago. Our neighborhood, Wilson Windsor, which is by the Diamond Crest community encompassing the area between 168 and Teague, and De Wolf and Locan. We were in the middle of that battle and in the end we were able to show good reason why our area is already highly impacted, look at Dry Creek Elementary enrollment alone, and the high traffic and congestion issues already present. I will admit, I was skeptical that Clovis Unified was truly looking for parent feedback and suggestions in the process and meetings, and would actually use our feedback. I suggested a plan using the data, and the fact that Clovis Unified is going through the same aging in place issues NW Fresno went through years ago, meaning the children move on after school, but the parents stay, so no new children to feed into the school. This is now happening at Clovis High, Clovis West and Buchanan. My suggestion was to fill those elementary schools with declining enrollments, such as Garfield, by bumping the lines down a few streets for everyone to balance out the numbers. Much better than having to build new schools. Norm Anderson actually reached out and let me know mine, along with a few other similar plans, were actually used in the final draft. I was shocked and impressed that they held to their word and truly were listening to us.

Our area is isolated, with the only nearby basic few restaurants and the only gas station, which is small and very high priced, is on Temperance. There is also no road that runs East to West from our area except for Shepherd, which is only one lane heading in the western direction. Otherwise you have to use Nees, but to get to Nees you have to go through one of our neighborhoods. We already have a ridiculous amount of traffic through our neighborhoods on small residential and country single lane roads now, can't imagine an increase. Clovis Unified had this studied and agreed with the traffic flowing through the neighborhood being an issue. Again, if this was all true then, only a year or two ago, it is absolutely still true now. I don't see how this was ignored or not communicated in light of the lots chosen for the infill.

If our neighbor, Susan Thompson, who spoke also at one of the meetings, was at all accurate with her figures, then that would mean 250-350ish of the 1300 new residents would be filled into our tiny area. This seems to be an onerous and unfairly heavy burden to be placed on any one location, especially one as isolated and unconducive as ours. That would mean 20-25% would be in our two proposed lots!!! De Wolf in that area is a tiny one lane each direction road with a median, and a three way stop on the corner. I wanted to include pictures to show you how tight and dangerous that stretch

already is. Also, if you look at the entire stretch of Harlan Ranch in its southern area, they are mostly high density housing already. These are the small lot homes stacked next to the proposed lots. I would say we already have quite a bit of high density housing in our area as it is. Also, going back to the boundary fight, if they saw how impacted the schools were then, how in the world could they place another 300 families in this area. Let's say that is an average of one child per household, which is low by national standards, that would be 300 new students!! Let's say it is half that, 150 new students!! Our children were almost forced to move to new schools and we own homes here, but they want to cause a major injection of new students?

I think the most troubling thing is how the planning division has conducted itself so far. What we witnessed at that meeting was the opposite of what we experienced with Clovis Unified. They told us at that meeting that when given the mandate to identify and study these lots, that they did not look for any contingency or alternatives in case one of them did not work. That is either lazy or very intentional, making sure they could force it upon us, which is exactly what happened during the vote that night. I could only imagine if I was tasked with something and provided no contingency or alternative spaces. In business, you get fired or sued for such behavior. They work for us taxpayers, and I would imagine would have to abide by some kind of prudent man or fiduciary capacity. After letting us speak, only one planning division member dissented on the vote to change the zoning. He was very disturbed by what he had heard from all of us as Clovis residents, but the rest of them just rammed through the vote, changing the only lots in our area zoned for commercial or retail, leaving us no chance of having any much needed services in our area. I was disgusted by what I saw that night.

A much more suitable location would be in new construction like over by Clovis Ave and Shepherd, by Willow, or in all of the vast growth area in SE Clovis. Our area is so isolated that ather would be now services or transportation available out here either. I think the planning division, and the council, need to remember that we are the taxpayers that make all of this possible, and we have rights as well, and I am hoping that the city will fight for us just as hard.. Hearing that attorney that won the case against Clovis in her news clips is so blatantly racist, "these are areas that are upper middle class, and mostly white". I have never been so offended, what are other races that aren't white not capable of being upper middle class. I think it is time for people to stand and be counted. If this city starts to fold now to pressure or groups, I can tell you first hand from what I have heard from so many friends and neighbors, they will not just move, but leave the state. Once all of those heavy taxpayers leave, then Clovis will start to feel it.

One alternative idea for the space, if it has to be high density, would be a retirement home. This area is quiet, and I don't know of any in the area. It would keep the traffic down, and not add to the issue with school capacity by adding more students. Also, there is a freeway right there with access to Clovis Community right down the road, and the others easily accessible with 168. Plus plenty of doctors and medical groups nearby. You wouldn't have to worry about a grocery store or similar services or stores being nearby, since most of those provide food in house. I think that would be a much smarter fit. Just a thought.

I will be on vacation like most people for the July 6th meeting. I cannot say I agree with that being the date chosen given it is the Monday after the 4th of July weekend, meaning many people will most likely be unable to attend. I hate to be cynical, but it seems intentional to me.

I know this is a very long email, but a very important and informational one as well, so I hope you can find the time to read it in its entirety. Thank you so much for what you do, and your time and attention to this matter.

Sincerely,

Jason Horg

McKencie Perez

From: noreply@revize.com
Sent: Monday, June 29, 2026 8:38 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Terry Maldonado
text-1755209464120 = [redacted]
text-1755209498255 = [redacted] N. Bush Ave
textarea-1755209560293 = I could not find specific information on the details regarding R-3 zoning. Assuming it's apartments but how many and how many stories is proposed? I'm also assuming the decisions have been made and they are final?
Client IP = 73.151.54.177

McKencie Perez

From: noreply@revize.com
Sent: Wednesday, July 1, 2026 3:35 PM
To: Aaron La Mattina
Cc: McKencie Perez
Subject: PLANNING COMMISSION PUBLIC COMMENT
Attachments: New Development at 270 W Herndon.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

date-1745483708617 = 2026-07-06
text-1745483711071 = (GPA)2024-003
text-1745483712599 = keith avera
text-1745483713055 = [redacted]
textarea-1745483714111 = Attached is my letter and pictures of concerns regarding the development at 270 W Herndon
Client IP = 73.151.52.253

Keith Avera

[redacted]

[redacted]

June 30,2026

To: Planning Commission

Council Members

Planning Department

RE: APN: 491-020-42

Address: 270 W Herndon

I am writing concerning the development of the above property. Unfortunately, the hearing is on the day after July 4, 2026, holiday and I will not be able to attend. I have two concerns as a resident in the neighborhood adjacent to this property. We currently are experiencing the effects of the city planning decisions and as of now my neighbors and I have been essentially told that we must live with the use of our residential streets as parking for adjacent business. My concern is that the development of multiple housing units on this parcel will increase the parking in our neighborhood, especially on weekends when friends/family come to visit the tenants/owners in the housing units. This will only exacerbate the current issues to our residential community and affect our home values in the long run unless some remediation can be done. Currently our issues with the adjacent businesses are as follows:

1. The grade differential and the impact that the lighting will have on our neighborhood. This property is currently being graded at 3 to 3.5 feet above our adjacent properties. This is evidenced by the additional 150 vehicle sale spaces that were added to the business at Nissan of clovis.

2. Parking: Nissan of Clovis added parking spaces for their car sales and not for employee parking and ever since their employees have been parking up and down our streets and using our residential neighborhood to ferry their inventory through them. The employee parking that Nissan of Clovis is using in our residential neighborhoods is primarily on Peach, Magill and N Bush St. The day care center at 290 N Villa, Clovis CA 93612 uses W Fremont for business parking. The employees park all the way to the end of the corners at the access points of Fremont/Villa and Magill/Peach. This type of parking blocks the view to safely exit onto Villa and Peach for our residents.

My hope is that you will consider my points and believe that with extra thought the issues of grade differentials, light impacts to our neighborhood and the additional impacts of parking can be addressed to make our community safe and avoid issues later. If you have any further questions, please contact me.

Sincerely,

Keith Avera

[redacted]

[redacted]



Nissan of Clovis employee parking on Bush



Nissan of Clovis employee parking on Magill



Nissan of Clovis added sales parking



Grade differential of 270 West Herndon and back fences of residential Magill.



Nissan of Clovis employee parking on Peach

McKencie Perez

From: [redacted]
Sent: Thursday, July 2, 2026 1:07 PM
To: McKencie Perez
Subject: Comments Regrading Infill Rezoning Program
Attachments: Clovis Infill Rezoning Program Comments - S. Gettman.docx

Good Afternoon,

Please find attached written comments to be included for the July 6, 2026 Clovis City Council Meeting regarding the proposed Infill Rezone Program.

Thank you.

Steve Gettman
[redacted]
[redacted]
[redacted]

To: Clovis City Council Members
Clovis Planning and Development Services Department

From: Steve Gettman
[redacted]

Date: July 2, 2026

RE: Clovis Infill Rezone Program Parcels 157 and 197 in Harlan Ranch

I'm reaching out due to my concern regarding the Infill Rezoning Program (Parcels 157 and 197) that the Planning Commission approved resolutions recommending the City Council approve the project on May 28, 2026.

While I understand the need for high density housing and affordable housing within the City of Clovis, I have also seen what makes them successful:

- Transparency from all parties involved in the decision-making/planning process including community members
- Doing the process together, not having the process done "to you"
- Smaller developments that do not overload the infrastructure and drastically change existing communities
- Being proactive to concerns and not reacting after the fact

Unfortunately, the city has failed in these areas:

- There has been a lack of transparency regarding the selection of parcels for the Infill Rezone Program. The 20 selected parcels were presented to the public on December 16, 2025. We were told at that time as well as on May 28, 2026 (when Planning Commission approved the parcels) that any changes to the selected parcels could not be made as it could result in litigation. In addition, all parcels had to be approved together and not individually. If one parcel was changed, the process of selection and approval would need to be completely redone.
- It feels like the Harlen Ranch Community is having it "done to them". They were not involved in the selection process, there was little transparency, and it feels like the decision that the Planning Department/Commission made to move forward with the rezoning was already decided prior to any notifications or meetings (information given, showed parcels that were selected, told cannot make any changes).
- The proposal for Harlen Ranch feels disproportional/punitive. It has the area receiving approximately 25% of the High-Density Rezoning (up to 353 units). No other area is being impacted in this way. The magnitude of these 2 developments will adversely affect the Harlen Ranch Community and their quality of life.

I have worked extensively in communities with Affordable High-Density housing and have found the following to be true:

- When individuals live close together, there is more conflict. In the High-Density communities I have worked in, the police were somewhat active in those developments that had approximately 100 units. In developments that had 200+ units, the police were very active (a police substation was put in one of the developments due to continued conflict and crime).
- Parking becomes a major problem with many tenants having 2 or more cars combined with guests. Parking spills over into the surrounding areas which creates conflict in the community.
- Due to increased traffic in and out of the area, crime and vandalism increases in these communities.
- High Density Housing puts stress on an area's infrastructure, especially areas where the infrastructure is already insufficient or doesn't exist.

The following problems **currently exist** in the Dewolf Avenue/Owens Mountain Parkway area and have yet to be addressed for over 10 years due to inadequate infrastructure being provided in the area and I have little faith that these issues will be addressed in a timely manner if the rezoning is approved and development on these parcels begins.

- Currently the 168/Owens Mountain Intersection cannot handle the volume of traffic that is being moved from 168 to Owens Mountain Parkway. Owens Mountain Parkway "squeezes" to one lane which becomes a safety concern (I have been "pushed" into oncoming eastbound traffic by drivers trying to make last minute passes on the right side heading west. In addition, the traffic backs up at the intersection of Owens Mountain Parkway and Dewolf (3 way stop sign).
- Since Owens Mountain Parkway fails to connect to Temperance Avenue, Richmond, Salem, and Quincey Avenues have become main thoroughfares in connecting Temperance Avenue to Dewolf Avenue. This increased traffic volume and speeding through these residential areas has created safety concerns in the residential area.
- The intersection of Nees Avenue and Locan Avenue (access roads used by many drivers) constantly floods during inclement weather (rain) for at least the last 10 years but has yet to be addressed by either the City of Clovis or Fresno County. This again continues to create unsafe conditions in the area. I have also heard no plans for Nees Avenue east of Locan Avenue.
- The infrastructure in the area does not support the area at this time and will worsen with the addition of 300+ housing units. Planning and construction for the Owen's Mountain Parkway and appropriate freeway entrance and exit should have started over 10 years ago when developments to the west of Dewolf Avenue were proposed. The freeway development as well as Owen's Mountain Parkway is dependent on land acquisition that has yet to be acquired as well as CalTrans approval (freeway and land owned south of Owen's Mountain Parkway).
- If the proposed 2 parcels are Rezoned to High Density, it will multiply the already existing traffic and safety concerns in the Dewolf Avenue/Owens Mountain Parkway area. Not only

will traffic significantly increase due to increased population (up to 353 units multiplied by 2 to 3 vehicles) and their guests but since there will be no zoned commercial property (restaurants, gas, food, stores) in the area, the community is forced to either drive to acquire these services, or vehicles come into the community to provide these services (food deliveries, UPS, Fed Ex, Amazon, etc.).

- In addition, I have little faith that these issues will be addressed in a timely manner once the rezoning is approved and development on these parcels begins.

In closing, I am very disappointed in the lack of transparency regarding the rezoning of properties as infill in the City of Clovis. With approximately 25% of the High-Density Zoning being in the Harlan Ranch Community (both parcels across the street from each other) it feels disproportional to the rezoning being done in the rest of the City of Clovis.

Since the first meeting I attended in December, it felt that the meetings were compliance driven to inform residents of the Infill Rezoning and that it was already decided that they would be moving forward to recommend approval of all 20 parcels without regard to the affected community concerns.

I am not opposed to one of the parcels being rezoned (preferably the corner east of Dewolf Avenue since we would still be able to retain commercial property to the west of Dewolf Avenue).

It was quite evident from the Planning Department that the decision to move forward with the 20 parcels had already been decided prior to any meetings being held. The individuals that bought property and live in the area were under the impression from developers and the Harlan Ranch Master Plan that there would be planned commercial on the northeast corner of Owens Mountain Parkway and Dewolf Avenues that would provide services to the area. If 157 and 197 are approved, all commercial zoning in the Harlan Ranch Master Plan will be gone and be replaced with more people, more congestion, and no commercial services for the community.

Thank you.

McKencie Perez

From: Jeff Arkelian <[redacted]>
Sent: Thursday, July 2, 2026 10:22 PM
To: McKencie Perez
Subject: Re: Fwd: Infill Rezone Program

Sent from Yahoo Mail for iPhone

On Thursday, July 2, 2026, 8:51 PM, Jeff Arkelian <[redacted]> wrote:

Sent from Yahoo Mail for iPhone

On Thursday, July 2, 2026, 8:47 PM, Lynn Arkelian <[redacted]> wrote:

---------- Forwarded message ---------
From: **Jeff Arkelian** <[redacted]>
Date: Thu, Jul 2, 2026 at 8:44 PM
Subject: Infill Rezone Program
To: <[redacted]>

Sent from my iPhone
Dear McKencie Perez,

My name is Jeff Arkelian and I reside in the neighborhood that is adjacent to Parcel # 72. I've lived @ 526 W. Enterprise Ave with my family for the past 30 years. We were the first home owners to move into our development and it's been a great experience for all these years! But we are very concerned about the City of Clovis's Infill Rezone Program. Obviously, we would prefer houses or condos to be built on this parcel of land!!

Anyway, about 2 years ago, the owner of Parcel #72, John Bayrakdarian, DDS, the owner of a chain of Unique Orthodontic offices, held a meeting at his office at Peach & Nees. He had his Architect Ron Marlette inform myself and the folks from our neighborhood that Bayrakdarian intended to develop his property and have 3/4 story Apartments placed throughout his development. Needless to say, nobody at the meeting was pleased to hear

this.
He stated that there would be 2 driveways placed right across the street from Garfield Elementary School for access on the East side of the Apartments. I assumed at the time that Kenosha Ave. would be opened up for access on the West side of the development. Kenosha Ave runs into Sylmar Ave., which T's into Nees Ave., our southern access into our neighborhood.
This access from Nees on Sylmar has already been impacted by the Valley Cresent School's rush hour traffic in the AM. Cars come into our neighborhood on Sylmar and make a U-turn on Sylmar in our neighborhood around a center island. The cars then sit in the bike lane on Nees to access the 1 driveway into the school. I'm not sure if the school is still pushing to increase their enrollment from 171 students a to 415? What a bigger mess that will become!!! And how about all the traffic steaming out onto Peach right across from Garfield from the 2 proposed apartment driveways in the AM traffic crush. And then add the Alta Sierra & Buchanan traffic into the mix and we have a big mess for everyone in the area. This is very poor planning by the City of Clovis. You all need to do better for our neighborhood and the students at the Buchanan Educational Complex.

So, I'm not surprised that the City of Clovis has pretty much given the green light to the owners of these properties involved in this poorly conceived program. I was born and raised in Fresno and I was in the area and do remember that in the mid 90's there was a big corruption scandal called Operation Rezone. It sure seems like the the DEVELOPERS are again calling the shots, this time with the City of Clovis with their undo influence. It's obvious that the City of Clovis could've required the developers in the Loma Vista and Heritage Grove developments to place low income apartments in the vicinity of their projects!!
It's understood that DEVELOPERS make most of their money on single family homes. The financial structure of Clovis has long been based on developer fees(until
Measure Y) and the City of Clovis desired to keep them happy by not requiring them to help solve our low income housing issues and gave them a free pass ? So, this is where the Infill Rezone Program comes in by having big, ugly 3/4 story apartments jammed down our collective throats. Ms. Perez, I'm sure you wouldn't want this type of development in your backyard! I can see placing 2 story apartments, but this whole program STINKS the way it's laid out. Put yourself in our shoes. The City of Clovis needs to show the Clovis residents in these Infill Rezone areas some love and compassion, there has to be a better solution.

I sure wish the City of Clovis would have continued developing low income housing like the way they did on the Northeast corner of Willow and Alluvial. The address is 725 W. Alluvial. It's a 4 acre parcel that only has 1/2 story units throughout the apartment complex. The complex is called Solivita Commons. It's tucked in between the ARCO on the West, a Derrel's Mini Storage on the North, and a Senior Living complex on the East. My youngest daughter lived there for about 1 year after it opened in 2021. There are 60

units in this clean, safe, nice looking gym complex. So, this turned out to be an ideal spot for low income housing. This complex was conceived with thoughtful planning , unlike what's transpiring throughout the Infill Rezone Program.

In conclusion, the City of Clovis got the State of California off their backs and managed to keep the DEVELOPERS super happy and unaffected. You know, you stated that you initially had earmarked 24 units for this program and then lowered it to 20. Why not go for 28 or 30 parcels to keep the apartments to 2 stories? Why jam 3/4 story, ugly apartments in these parcels and compromise nicely planned single family neighborhoods. I understand that there needs to be a workable plan, so, why not seek the middle ground and compromise with ONLY 1/2 story apartments? It sure seems like you're following the path of least resistance with this Infill Rezone Program, you all need to up your game!!! You're creating a lot of animosity amongst amongst a good number of long term residents of Clovis who deserve better. You know the saying, Clovis, it's a way of life. I'm thinking sadly, that mindset is long gone!!!!

Sincerely, Jeff Arkelian

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 11:14 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Rhianna Beaumont-Lamb
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = V

Dear Mayor and City Council Members,
As a homeowner in the Harlan Ranch/Owens Mountain area, I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/commercial" to high-density affordable housing.

Many residents purchased homes here based on promises of walkable, nearby shopping—a plan changed without prior notification to homeowners. While we understand the need for affordable housing, this specific location cannot support the infrastructure strain:

Bud Rank Elementary is already at capacity. High-density family housing will severely overcrowd our local schools.

Additionally, roads in this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety.

We respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.
Please protect our neighborhood's infrastructure and support senior housing for this site.
Client IP = 50.201.240.100

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 3:32 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Michael
text-1755209464120 = [redacted]
text-1755209498255 = Harlan Ranch
textarea-1755209560293 = I am writing to express my concerns regarding the proposed rezoning for additional affordable housing near the Owens Mountain area.

I understand the need for affordable housing, but I do not believe this location is the right place for additional high-density development. This area is already experiencing significant growth, and I am concerned that adding more housing will overwhelm the existing infrastructure.

Our local schools are already facing increasing enrollment, and additional housing could further overcrowd them. There are also very few shopping centers, grocery stores, restaurants, and other everyday services in this part of Clovis.

Traffic is another major concern. This is one of the last residential developments before the foothills, and there are very few roads available to handle the increased traffic that hundreds of additional homes would generate. Roads such as Owens Mountain Parkway, De Wolf Avenue, Shepherd Avenue, and Highway 168 are already heavily traveled during peak hours. Without significant roadway improvements, I believe this development will create congestion and safety concerns for residents.

I respectfully ask the City to carefully evaluate whether the infrastructure—including roads, schools, emergency services, and commercial development—is sufficient before approving additional housing in this area. I hope the City will consider the long-term impact on the existing community and ensure that growth is balanced with the services and infrastructure needed to support it.

Thank you for taking the time to consider my comments.
Client IP = 99.20.222.154

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 3:33 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kris and Aida Kachadoorian
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = As a homeowner in the Harlan Ranch/ Owens Mountain area, I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/ commercial" to high-density affordable housing.
Many residents purchased homes here based on promises of walkable, nearby shopping—a plan changed without prior notification to homeowners. While we understand the need for affordable housing, this specific location cannot support the infrastructure strain:
Bud Rank Elementary is already at capacity. High-density family housing will severely overcrowd our local schools.
Additionally, roads in this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety.
We respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.
Please protect our neighborhood's infrastructure and support senior housing for this site.
Client IP = 170.232.227.254

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 3:42 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Adan Bautista
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = I just want express my disapproval and opposition to this project in the Harlan Ranch area.
Client IP = 104.36.176.198

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 3:48 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Kevin Sciutto
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = To rezone the Harlan Ranch area would unjustly impact our communities and home values. We moved further away from the city have less density, not higher.
Client IP = 74.253.6.110

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 3:51 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Hyung Tae Kim
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = I am writing as a homeowner in the Harlan Ranch/Owens Mountain neighborhood to raise serious concerns about the proposed rezoning of the parcel at Owens Mountain and De Wolf Avenues from live-work/commercial to high-density affordable housing.
Many of us purchased homes here based on the original plan for walkable, nearby commercial space — a change that was made without any prior notification to residents. We understand and support the City's need to meet its affordable housing mandates, but we believe this particular site is not well-suited to high-density family housing, for two key reasons:
School capacity. Bud Rank Elementary is already operating at capacity. Adding high-density family housing to this parcel would significantly overcrowd the school and strain educational resources for the entire neighborhood.
Traffic and safety. The roads surrounding this parcel are already heavily congested. A large influx of multi-family units would worsen gridlock and create additional safety risks for pedestrians, cyclists, and drivers alike.
As a constructive alternative, we respectfully request that this parcel be zoned exclusively for affordable senior housing. This approach would allow the City to make meaningful progress toward its housing goals while avoiding the strain on Bud Rank Elementary and minimizing the added traffic burden on our streets.
Client IP = 172.59.51.227

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 4:13 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Samantha Keen
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = I have been a resident in clovis for 10 yrs. I moved herw from orange county to harlan ranch because it made me feel safe being a single mother. I also was very impressed by the school district. However now I am concerned about crime increasing in the area and our schools being overwhelmed by more children. Therefore I am asking the city to please only use this zoned area for low income senior housing
Client IP = 143.105.117.90

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 4:21 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Carolyn Mendonca
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = As a homeowner in the Harlan Ranch/Owens Mountain area, I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/commercial" to high-density affordable housing.
Many residents purchased homes here based on promises of walkable, nearby shopping—a plan changed without prior notification to homeowners. While we understand the need for affordable housing, this specific location cannot support the infrastructure strain:
Bud Rank Elementary is already at capacity. High-density family housing will severely overcrowd our local schools.
Additionally, roads in this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety.
We respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.
Please protect our neighborhood's infrastructure and support senior housing for this site.

Client IP = 104.56.37.53

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 6:04 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Amanda Tejeda
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = As a resident in the Harlan Ranch/Owens Mountain area, I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/commercial" to high-density affordable housing.

Many residents purchased homes here based on promises of safe, walkable nearby shopping and an area that would maintain the value of our homes. A nefarious plan by those in Sacramento who have no idea of the infrastructure or congestion of our already schools and roads should not dictate what voters have already decided on.
Bud Rank Elementary is already at full capacity to include surrounding Elementary schools. Family housing will severely overcrowd our local schools and decrease our home value.

Additionally, roads in this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety. Harlan Ranch in particular.

I respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.

Please protect our neighborhood's infrastructure and support senior housing for this site.
Client IP = 98.255.24.50

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 8:06 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Amy bennett
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = As a homeowner in the Harlan Ranch/Owens Mountain area, I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/commercial" to high-density affordable housing.

Many residents purchased homes here based on promises of walkable, nearby shopping—a plan changed without prior notification to homeowners. While we understand the need for affordable housing, this specific location cannot support the infrastructure strain:

Bud Rank Elementary is already at capacity. High-density family housing will severely overcrowd our local schools.

Additionally, roads in this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety.

We respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.

Please protect our neighborhood's infrastructure and support senior housing for this site.
Client IP = 73.66.49.85

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 6, 2026 9:01 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Pamela Paras, CMT, LMT, MLD-C
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 =
When my family and I moved cross country, we chose Harlan Ranch based on promises of walkable, nearby shopping (a plan changed without prior notification to homeowners) and to pursue a more quiet, safe environment for our family.

As a resident I am writing to express serious concerns regarding the proposed rezoning at Owens Mountain and De Wolf Avenues from "live-work/commercial" to high-density affordable housing.

While I understand the need for affordable housing, this specific location cannot support the infrastructure strain.

While my child is no longer in elementary school, I know that Bud Rank Elementary is already at capacity. High-density family housing will severely overcrowd our local schools and bring more child foot traffic and school busses into an already bustling neighborhood. The roads in and around this area are already heavily congested; a large influx of multi-family units will worsen gridlock and safety both in and outside of Harlan Ranch.

My family and I respectfully request that this parcel be zoned exclusively for Affordable Senior Housing. This compromise allows Clovis to meet its housing mandates while completely protecting Bud Rank Elementary from overcrowding and significantly reducing potential traffic congestion.

Please protect our neighborhood's infrastructure and support senior housing for this site.

Sincerely,

Pamela Paras, CMT, LMT, MLD-C

Client IP = 73.2.98.245

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, July 7, 2026 3:39 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Cheryl Rusconi
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = As a homeowner in the Harlan Ranch/Owens Mountain community, I would like to share my concerns about the proposal to rezone the property at Owens Mountain and De Wolf from live-work/commercial to high-density affordable housing.

When many of us chose to purchase our homes here, we did so with the expectation that the area would eventually include neighborhood shops and services within walking distance. Learning that this plan may change without input from nearby residents is concerning.

I fully support the need for affordable housing, but I don't believe this location is the best fit for a high-density family development. Bud Rank Elementary is already very busy, and adding a large number of family housing units could place even more pressure on the school. Traffic in this area has also increased significantly, and additional high-density housing would likely make congestion and safety concerns worse.

I encourage the City to consider affordable senior housing for this site instead. It would still help address the community's housing needs while having a much smaller impact on our schools and local traffic.

Thank you for taking the time to consider the perspectives of the residents who live in and care deeply about this neighborhood.
Client IP = 198.0.227.89

City of Clovis

Re: Clovis Infill Rezone Program

Dear McKencie Perez,

My name is Marty Bohigian and I reside in a home that sits on a property adjacent to parcel #72 in the city of Clovis. I have lived at [redacted] with my family for over 28 years. We were one of the first homeowners to move into our newly built home at the time and it has been a great experience for these past years. However, we are very concerned about the city of Clovis Infill Rezone Program. Obviously, we would prefer to see zoning for parcel #72 remain as is, so that single family homes be built like the rest of our neighborhood.

One of the biggest concerns I have with the addition of high density or very high density housing on parcel #72 is safety. There is currently a large amount of congestion of vehicles and students coming and going to school at the Buchanan Education Center; including Garfield elementary each weekday morning and afternoon. Access to a new high density apartment complex would require at least one or two driveways that would force additional traffic onto Peach Avenue directly across the street from Garfield.

I have many concerns keeping everyone safe in our community today with the congestion of vehicles, students (riding bicycles, e-bikes and scooters) and parents moving in and around Garfield.

In conclusion, I realize the city of Clovis is trying to comply with the state of California regarding the addition of affordable housing. It just seems like you're taking the path of least resistance with this Infill Rezone Program by using willing land owners to comply with the state mandate. I moved here from Fresno for the "Clovis Way of Life", but sadly that will end for my family and our neighborhood if this parcel #72 rezone takes place and apartments are built.

Sincerely,

Marty Bohigian

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 13, 2026 2:32 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Charles Baley
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = Ask almost any Clovis resident if they want affordable high density housing in their neighborhood. The overwhelming answer will be no. We don't want to be like Fresno. That's why we choose to live in Clovis. Infill Rezone Program is a horrible idea being forced on the people who actually call Clovis their home by outsiders. It must be stopped before it too late.
Client IP = 67.181.14.214

McKencie Perez

From: Briana Parra
Sent: Wednesday, July 15, 2026 11:26 AM
To: McKencie Perez
Cc: Andrew Haussler; Renee Mathis
Subject: FW: City of Clovis Apartment rezone

Please see below Public Comment.

Thank you,

Briana Parra
City Clerk
Office: 559-324-2060
brianap@clovisca.gov

From: Kim Eidson <[redacted]>
Sent: Wednesday, July 15, 2026 10:10 AM
To: Matt Basgall <mbasgall@clovisca.gov>; Lynne Ashbeck <lynnea@cityofclovis.com>; Diane Pearce <dianep@clovisca.gov>; Vong Mouanoutoua <vongm@clovisca.gov>; Drew Bessinger <drewb@cityofclovis.com>
Subject: City of Clovis Apartment rezone

Good morning!

I have been reading the article on the proposed rezones. What stood out to me and seems to be overlooked is the City offering to lower standards for these proposed properties with less parking and no greenspace required when the standards should be elevated to make these proposed complexes a part of the neighborhoods rather than a problem.

I live behind Coventry Cove Apartments and went through the same process years ago when that property was being rezoned to high density. The initial plans proposed by the builder were very different from what we were able to have changed to make the complex more a part of the neighborhood without detracting too much from our existing homes. The initial plans had parking directly behind our homes against the existing wooden fences, 2 story units right behind our homes looking into our backyards. We were able to get block walls, have parking moved to the front and one story units behind our homes. Green space, trees and greenery added to cut sound and give us a buffer.

My point is that with input from residents, the City can work to create a compromise similar to Coventry Cove. Do we still have issues - yes, we have police activity there quite often. Much of that could be mitigated with the addition of cameras which would weed out the problem tenants.

A city, resident commission would be very helpful with the process. Most homeowners worked hard to get where they are and they just want to enjoy their homes. Support from the city and planning commission to hold these projects to a standard that fits with the existing neighborhood would go a long way. Don't compromise on the projects at the expense of our beautiful city and neighborhoods. Anything proposed should fit within the Clovis Way of Life.

Kim Eidson

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 27, 2026 2:30 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = K L
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = I oppose building these low income in our neighborhood of Harlan ranch! They should've been proposed back when these builders built and advised homeowners that they would have low income housing in the development at that time. Then signed acknowledgement. That is not the case and I used to work in new home construction/sales and that was what was happening at that time (in another county). People knew what was going to be in the neighborhood. We do not want low income housing bringing our house values down and is not fair to us. We have been homeowners for a long time here in this neighborhood. Build these low income houses in some of your new build developments and let the new homeowners be advised of this upfront. We are not OK and oppose this every single one of us for the most part are going to agree! Stand up for our city & long term homeowners and citizens! We don't need our homes to lose value and they will over this nonsense!!!!
Client IP = 108.227.94.93

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 27, 2026 2:42 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Ethan Eliason
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = I would like to know more information about the 2 rezone sites...157 and 197. What density are those two sites going to be rezoned to?
Client IP = 97.213.153.197

McKencie Perez

From: noreply@revize.com
Sent: Monday, July 27, 2026 4:00 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Hilda Vandergriff
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = We have lived In Harlan Ranch community for over 17 years. I would not like to see lower income housing near our neighborhood. It will bring people into our community parks, our school traffic will be affected, the traffic for people going to work will also become a nightmare. We pay HOA dues to keep our community clean and safe.

Client IP = 76.20.65.15

McKencie Perez

From: Daniel Valluzzi <[redacted]>
Sent: Monday, July 27, 2026 4:04 PM
To: McKencie Perez
Subject: Infill Rezone Program Question

Good afternoon,

In regards to the infill rezone near the Harlan Ranch community, could you please provide me with an example of the type of housing development that may be built?

Thanks,
Daniel

McKencie Perez

From: Gregory Belemjian <[redacted]>
Sent: Tuesday, July 28, 2026 6:28 AM
To: McKencie Perez
Subject: In fill

My name is Greg Belemjian. My wife, Mary and I reside at [redacted].
We are very concerned about the in fill rezone taking place at several locations in Clovis including two large properties adjacent to Harlan Ranch. We've lived here since 2009 and love the community. Our children and Grandchildren live here as well.
Unfortunately, promises have been made to Harlan Ranch residents for the use of this land for years. Shopping villages with integrated residential, promises of no high density apartments, etc.
Now we learn R1 zoning is being changed to R3 and R4 allowing multi story, high density apartments on this land.
My understanding is this radical change is the result of a court order as a result of a law suit accusing the city of Clovis of not providing adequate low income housing. This law suit I'm told originated and was directed by parties not residing in Clovis.
It appears all development requirements are being relaxed and EPA regulations are being waived.
Information regarding details of these projects are sparse at best and we've been told how this project is going forward. The city has no choice but to change the zoning and hand the project to developers.
We're told the cities involvement ends and the developers have a free hand once the zoning is changed.
Where is leadership on the part of the city of Clovis.
Who in city government is going to stand up and say NO! This is nuts. Absolutely no consideration of this kind of development when our adjacent communities were developed.
No one's opposed to high density communities, but building them on top of established single family communities makes no sense.
We have no water, schools, sewage, retail, transportation, or basic life support for this kind of retrofitted development.
These kinds of developments bring nothing positive to Clovis. Have we learned nothing from similar developments in Fresno.
This appears corrupt at its core.
We have more than adequate low income housing available in Clovis.
This zoning change will seriously impact the lives of the family's who have invested their life's work into their homes. For many, their homes are their primary financial assets. This development is doomed to failure. The lack of rationally planned infrastructure alone, before a shovel of dirt is turned should be a GIANT RED FLAG!!!!
Retrofit infrastructure always becomes an expensive ongoing nightmare.
Clovis is a way of life, one of the best places to live in this crumbling state. We've been able to maintain this quality of life while growing sensibly to allow more people to enjoy the quality of life we have provided for decades.
Please don't roll over. Please stand tall and strong.
All of us are depending on you to preserve the unique quality of life we cherish.
Our children and Grandchildren are counting on you to do the right thing.
This zoning change and consequent development will irreparably damage the existing communities.
Quality of life is at stake.
Don't let our "way of life"
slip away.
Please stand against this zoning change. Once passed, there's no going back.

Thank you for your consideration.
Regards,
Greg Belemjian

Sent from my iPhone

McKencie Perez

From: noreply@revize.com
Sent: Tuesday, July 28, 2026 6:35 AM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Michelle Ascue
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = NO for high density housing! It will destroy the property values and overburden the area roads with too many cars and the overwhelm the schools with too many new kids! Please rethink this!!! If you want to add Senior Housing that could be a viable option. I have heard from many homeowners (as a resident and local Realtor [redacted]) that have lived here for awhile, including myself, and NOBODY wants Hi Density housing in this Harlan Ranch region!
Client IP = 45.25.87.226

McKencie Perez

From: Gregory Belemjian <[redacted]>
Sent: Tuesday, July 28, 2026 8:25 AM
To: McKencie Perez
Subject: Rezone

Good morning,
I'd like to add one further thought.
I've always wondered how Kingsburg has managed to control its growth and quality of life.
Kingsburg is a Charter city.
I'm no expert, but the basic structure of a Charter city is local governance over local issues.
Can this be a possible solution to the rezone issue, as well as local governance going forward.
Has this already been considered?
Regards,
Greg Belemjian

Sent from my iPhone

McKencie Perez

From: Paul Armendariz
Sent: Wednesday, July 29, 2026 9:29 AM
To: Briana Parra; McKencie Perez
Subject: FW: density review for vacant property at Shaw and Locan

Infill rezone public comment.

Paul

Paul Armendariz
Assistant City Manager
Office: 559-324-2060
PaulA@clovisca.gov

From: Vong Mouanoutoua <VongM@clovisca.gov>
Sent: Tuesday, July 28, 2026 10:27 PM
To: Paul Armendariz <PaulA@clovisca.gov>; Andrew Haussler <andrewh@clovisca.gov>
Subject: Fw: density review for vacant property at Shaw and Locan

FYI

Vong Mouanoutoua
Mayor
Office: 559-324-2010
VongM@clovisca.gov

From: Cyndy Thomas [redacted]
Sent: Tuesday, July 28, 2026 1:50 PM
To: Vong Mouanoutoua <vongm@clovisca.gov>
Subject: density review for vacant property at Shaw and Locan

Good afternoon Mayor,

I apologize for sending an email rather than appearing in person at the City Council meeting tonight, but no one would want me sharing my flu germs. I hope this email will suffice.

I would like to address the proposed rezoning of the vacant property at Logan and Shaw. I have no doubt that this will ultimately be rezoned, but I would like the city council to carefully consider the traffic situation before making a final decision.

Locan is a two-lane roadway, with a turn lane in the center. During the summer, traffic is manageable. During the school year the area becomes heavily congested due to the close proximity of both Freedom Elementary School and Red Bank Elementary School.

I completely understand the need for affordable housing. However, I question whether this particular property is well suited for high density development. I respectfully ask the City Council to consider rezoning the property for **medium or low density** residential use.

Thank you for your time and consideration.

Sincerely,

Cyndy Thomas
[redacted]
[redacted]

"Some people wait a lifetime for a miracle, we raise them one at a time"

McKencie Perez

From: Ken Codeglia <[redacted]>
Sent: Wednesday, July 29, 2026 1:36 PM
To: McKencie Perez

Just wanted to offer my opinion that the proposed housing project next door to Harlan Ranch is an inappropriate site. I am not against the project and for the need to build additional housing, and certainly to comply with the court order. But that particular site is not appropriate for low-income families due to the lack of proximity to shopping and transit. Also, if there are school-age children involved it may negatively impact Bud Rank Elementary school.

Ken Codeglia
[redacted]

McKencie Perez

From: noreply@revize.com
Sent: Thursday, July 30, 2026 4:30 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Leland Howard
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = RE: Parcel #72

I are concerned about the proposed development on parcel #72, behind Unique Orthodontics.

There are 2 primary concerns that the City of Clovis needs to consider:

1. Traffic Impact - Peach Ave and Nees Ave are already extremely busy and the addition of apartments with vehicles and 2 additional access points will create an impact to both traffic and the safety of the children (and adults) the attend Garfield Elementary as well as Alta Sierra Intermediate.

2. Neighborhood Safety – The additional of Very High Density Residential will (unfortunately) decrease the safety of existing residents of the City of Clovis as they will most certainly be additional crime.

Local infrastructure should be looking to serve the safety of the families in the homes already in the area. Has there been a traffic impact study that specifically evaluates student safety during peak hours? Have the residents in our area and the neighborhood to the south participated in any type of questionnaire to delve into the impact of safety in our neighborhoods?

There was a reason this parcel was zoned as it was. I request that the city not rezone this parcel, as it is not in the best interest of the citizens of Clovis.

Client IP = 73.151.51.49

McKencie Perez

From: noreply@revize.com
Sent: Thursday, July 30, 2026 5:41 PM
To: McKencie Perez
Subject: Planning Infill Rezone Program Form - contact us

text-1755209425252 = Melissa Howard
text-1755209464120 = [redacted]
text-1755209498255 = [redacted]
textarea-1755209560293 = My name is Melissa Howard and my family and I have lived in the Buchanan Estates neighborhood just north of the corner of Peach & Nees for over 26 years.
As a long time residents of Clovis, my husband and I are concerned about the proposed development on parcel #72, behind Unique Orthodontics.

Over the years, we have watched our community grow in positive ways. However, we are becoming increasingly concerned about this proposed development at the expense of our neighborhood safety, and truly, The Clovis Way of Life.

Our primary concern regarding this project, is the massive increase in traffic directly across from Garfield Elementary School. This area is already heavily congested during morning drop off and afternoon pick up times. Having a high density complex in this parcel location will flood the streets with more vehicles, creating severe traffic problems, but most importantly, endangering children and their parents walking or biking to and from school, not to mention the residents who walk, bike, and run alone the sidewalk.

Local infrastructure should be looking to serve the safety of the families in the homes already in the area. Has there been a traffic impact study that specifically evaluates student safety during peak hours? Have the residents in our area and the neighborhood to the south and south east participated in any type of questionnaire to delve into the impact of safety in our neighborhoods?

There was a reason this parcel was zoned as it was. If that must change - we request the City Council make modifications in the best interest of the citizens in this neighborhood of Clovis.
Client IP = 73.151.51.49