

**CITY OF REEDLEY
MITIGATED NEGATIVE DECLARATION**

prepared for Environmental Assessment (EA) No. 2017-7

The Notice of Intent for this proposed environmental finding was filed with the

FRESNO COUNTY CLERK
2220 Tulare Street, 1st Floor
Fresno, California 93721-2600

On **April 26, 2018**
(copy Attached)

LEAD AGENCY:

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

APPLICANT:

United Health Centers of San
Joaquin Valley
650 Zediker Avenue
Parlier, CA 93648

PROJECT LOCATION:

Site Latitude: 36°36'15.984"N
Site Longitude: 119°25'49.9224"W

Assessor's Parcel Numbers: 363-070-49 (19.076 gross acres)

PROJECT DESCRIPTION: The City of Reedley initiated Environmental Assessment No. 2017-7 for the purpose of assessing the environmental effects of Annexation Application No. 2017-2, Pre-Zone Application No. 2017-2, and Site Plan Review Application No. 2017-3.

Annexation Application No. 2017-2 pertains to the annexation of approximately 19.076 gross acres into the City of Reedley and detachment from the County of Fresno, Fresno County Fire Protection District, and the Kings River Conservation District. The proposed annexation is adjacent to the existing City of Reedley City Limits and promotes orderly growth and development. The proposed annexation is consistent with the City of Reedley's adopted Sphere of Influence and the subject property has a Community Commercial Planned Land Use Designation pursuant to the City of Reedley 2030 General Plan.

Pre-Zone Application No. 2017-2 pertains to the pre-zoning of a 19.076 gross acre parcel to the CC (Central and Community Commercial) zone district designation in preparation for annexation consistent with the Reedley 2030 General Plan.

Site Plan Review Application No. 2017-3 pertains to the master planning of approximately 19.076 gross acres of commercially designated land. Phase I consists of an approximately 19,895 square foot single story medical clinic at the intersection of East Manning Ave and South Buttonwillow Avenue. Proposed building and parking for clinic use is assumed to be 4 acres in the southwest corner of the parcel. Phase 2 consists of the development of approximately 80,600 square feet of commercial uses and 17,000 square feet of residential/commercial mixed-use development, with parking and landscaping for the entire project, which exceeds the 25% development requirement for annexation.

The project site is located in the northeastern sector of the City of Reedley, on the northeast corner of East Manning Avenue and South Buttonwillow Avenue. The project site consists of one parcel (APN: 363-070-49). The 19.076 gross acres is currently vacant land and agricultural land. The area is bounded by commercial and industrial development to the south, a commercial shopping center to the west, county agricultural land to the north and county agricultural land to the east.

The City of Reedley has conducted an environmental analysis for the above-described project, contained in the attached initial study. The City of Reedley, as the Lead Agency, proposes to adopt a Mitigated Negative Declaration for this project. This Mitigated Negative Declaration is tiered from the certified Program Environmental Impact Report (SCH No. 2010031106) (PEIR) prepared for the Reedley General Plan Update 2030 (GPU). The project has been determined to be a subsequent project that is not fully within the scope of the certified Program Environmental Impact Report prepared for the GPU. Pursuant to Public Resources Code §21083.3 and California Environmental Quality Act (CEQA Guidelines) §15168, this project has been evaluated with respect to each item on the attached environmental checklist to determine whether this project may cause any additional significant effect on the environment which was not previously examined in the Program Environmental Impact Report (SCH No. 2010031106).

After conducting a review of the adequacy of the Program Environmental Impact Report (SCH No. 2010031106) pursuant to Public Resources Code Section 21083.3, the City of Reedley, as the lead agency, finds that no substantial changes have occurred with respect to circumstances under which the Program Environmental Impact Report (SCH No. 2010031106) was certified, and that no new information which was not known and could not have been known at the time that the PEIR was certified, has become available.

The completed environmental impact checklist, its associated narrative, and any proposed mitigation measure(s) reflect applicable comments of responsible and trustee agencies, as well as research and analysis conducted to examine the interrelationship between the proposed project and the physical environment. The information contained in the project application and its related environmental assessment application, responses to requests for comment, checklist, initial study narrative, and any attached thereto, combine to form the record indicating that an initial study has been completed in compliance with the California Environmental Quality Act and the CEQA Guidelines.

All new development activity and many non-physical projects contribute directly or indirectly toward cumulative impacts on the physical environment. It has been determined that the incremental effect contributed by this project toward cumulative impacts is not considered substantial or significant in itself, and/or that cumulative impacts accruing from this project may be mitigated to less than significant with application of feasible mitigation measures.

For some categories of potential impacts, the checklist may indicate that a specific adverse environmental effect has been identified which is of sufficient magnitude to be of concern. Such an effect may be inherent in nature and magnitude of the project. The completed environmental checklist form indicated whether an impact would be less than significant, or less than significant with mitigation. Effects so rated are not sufficient in themselves to require the preparation of an Environmental Impact Report, and have been mitigated to the extent feasible.

The project is not located on a site which is included on any of the lists enumerated under Section 65962.5 of the Government Code including, but not limited to, lists of hazardous waste facilities, land designated as hazardous waste property, hazardous waste disposal sites and others, and the information in the Hazardous Waste and Substance Statement required under subdivision (f) of that Section.

The initial study has concluded that the proposed project will not result in any adverse effects which fall within the "Mandatory Findings of Significance" contained in Section 15065 of the State CEQA Guidelines.

With the project specific mitigation imposed, there is no substantial evidence in the record that this project may have additional significant direct, indirect or cumulative effects on the environment that are significant and that were not identified and analyzed in the certified Program Environmental Impact Report (SCH No. 2010031106).

Additional information on the proposed project, including a copy of the proposed environmental findings, may be obtained from the City of Reedley, Community Development Department, City Hall, 1733 Ninth Street, Reedley, California 93654 during normal business hours (Monday-Friday, 8 AM – 5 PM). Electronic copies can be obtained by e-mailing ellen.moore@reedley.ca.gov.

Environmental Assessment No. 2017-7, Annexation Application No. 2017-2, Pre-Zone Application No. 2017-2, and Site Plan Review Application No. 2017-3 are scheduled to be considered by the City of Reedley Planning Commission on May 17, 2018. The Commission meeting will be held at 5:00 p.m., in the Council Chambers at Reedley City Hall, located at 845 G Street, Reedley, California 96354.

INITIAL STUDY PREPARED BY:
Ellen Moore, Associate Planner

DATE: April 26, 2018

SUBMITTED BY:



Ellen Moore, Associate Planner
Community Development
Department
CITY OF REEDLEY

Attachments: Notice of Intent to adopt a Mitigated Negative Declaration for Environmental Assessment (EA) No. 2017-7, dated April 26, 2018

EA No. 2017-7 Initial Study (including checklist from CEQA Guidelines Appendix G)

CITY OF REEDLEY
NOTICE OF INTENT TO ADOPT A
FINDING OF A MITIGATED NEGATIVE DECLARATION

Environmental Assessment (EA) No. 2017-7

FILED WITH:

FRESNO COUNTY CLERK
 2220 Tulare Street, 1st Floor
 Fresno, California 93721-2600

LEAD AGENCY:

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

APPLICANT:

United Health Centers of San
 Joaquin Valley
 650 Zediker Avenue
 Parlier, CA 93648

FILED

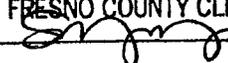
APR 26 2018

TIME
9:18am

PROJECT LOCATION:

Site Latitude: 36°36'15.984"N
 Site Longitude: 119°25'49.9224"W

Assessor's Parcel Numbers: 363-070-49 (19.076 gross acres)

FRESNO COUNTY CLERK
 By  DEPUTY

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SUMMARY OF FINDINGS: The City of Reedley has conducted an environmental analysis for the above-described project. The project has been determined to be a subsequent project that is not fully within the scope of the certified Program Environmental Impact Report (SCH No. 2010031106) prepared for the Reedley General Plan 2030 Update (GPU). Therefore, the City of Reedley, as the lead agency, proposes to adopt a Mitigated Negative Declaration for this project.

The completed environmental impact checklist, its associated narrative, and any proposed mitigation measure(s) reflect applicable comments of responsible and trustee agencies, as well as research and analysis conducted to examine the interrelationship between the proposed project and the physical environment. The information contained in the project application and its related environmental assessment application, responses to requests for comment, checklist and initial study narrative combine to form the record indicating that an initial study has been completed in compliance with the California Environmental Quality Act and the CEQA Guidelines.

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With the project specific mitigation imposed, there is no substantial evidence in the record that this project may have additional significant direct, indirect or cumulative effects on the environment that are significant and that were not identified and analyzed in the certified Program Environmental Impact Report prepared for the Reedley General Plan Update 2030. After conducting a review of the adequacy of the Program Environmental Impact Report (SCH No. 2010031106) pursuant to Public Resources Code Section 21083.3, as the lead agency, finds that no substantial changes have occurred with respect to circumstances under which the Program Environmental Impact Report (SCH No. 2010031106) was certified, and that no new information which was not known and could not have been known at the time that the Program Environmental Impact Report (SCH No. 2010031106) was certified, has become available.

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E201810000109

ANY INTERESTED PERSON may comment on the proposed environmental finding. Comments may be submitted at any time between the date of this notice and close of business on May 16, 2018. Please direct comments to Ellen Moore, Associate Planner in the Community Development Department at City Hall, 1733 Ninth Street, Reedley, California 93654, or phone: 559-637-4200, Ext. 222, or e-mail ellen.moore@reedley.ca.gov.

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INITIAL STUDY PREPARED BY:
Ellen Moore, Associate Planner

SUBMITTED BY:

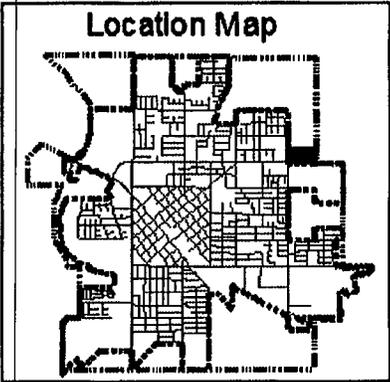
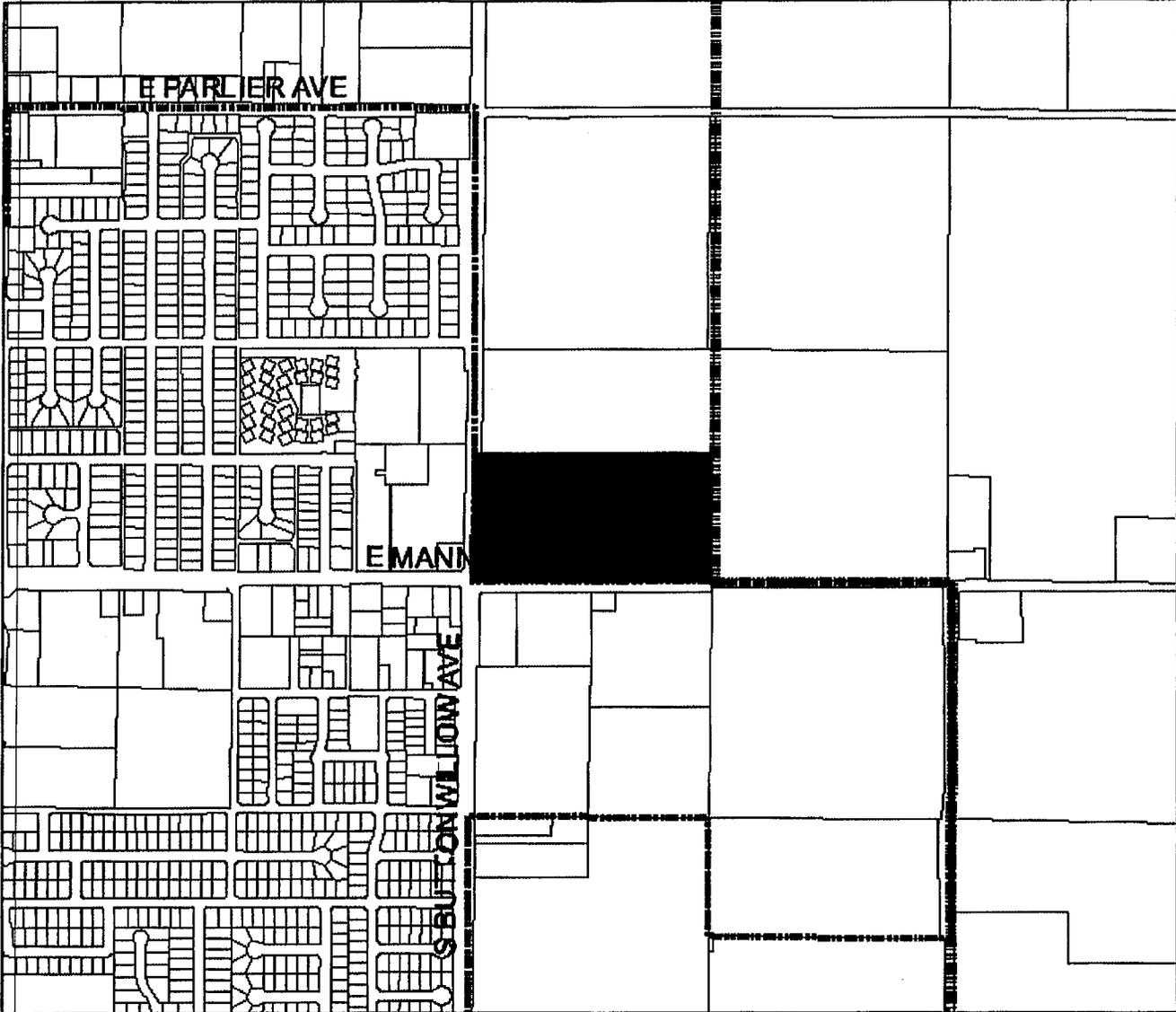


Ellen Moore, Associate Planner
Community Development
Department
CITY OF REEDLEY

DATE: April 26, 2018

Attachments: Annexation Application No. 2017-2
PreZone Application No. 2017-2
Site Plan Review Application No. 2017-3

City of Reedley
Environmental Assessment No. 2017-7
Annexation Application No. 2017-2



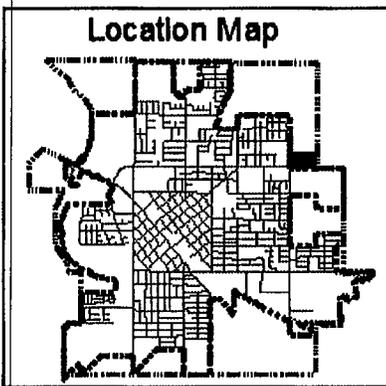
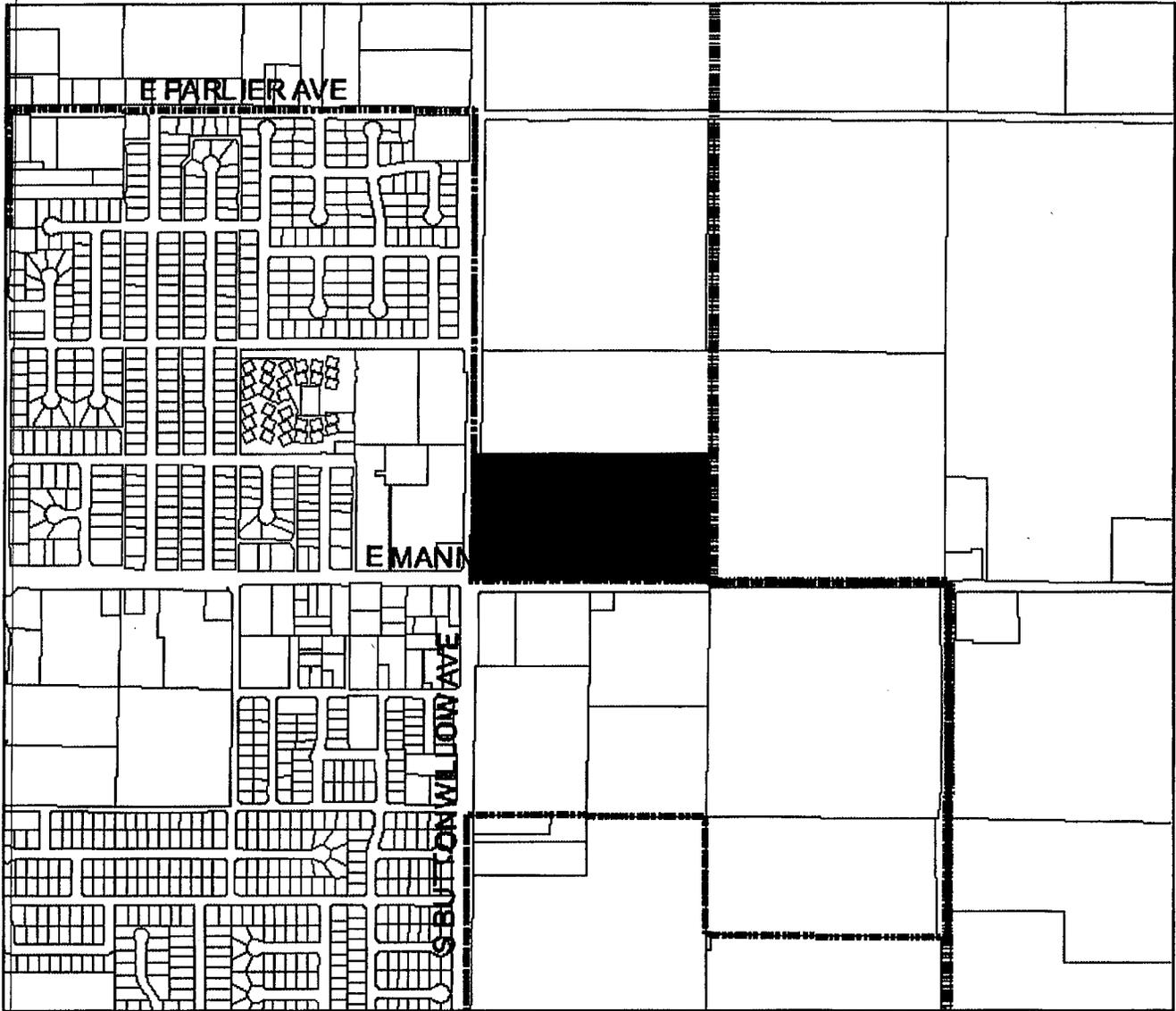
Legend

-  Reedley City Limits
-  Reedley Sphere of Influence
-  Proposed Annexation (approx. 19.076 acres)

0 250 500 1,000 Feet



City of Reedley
Pre-Zone Application No. 2017-2
Manning and Buttonwillow Annexation



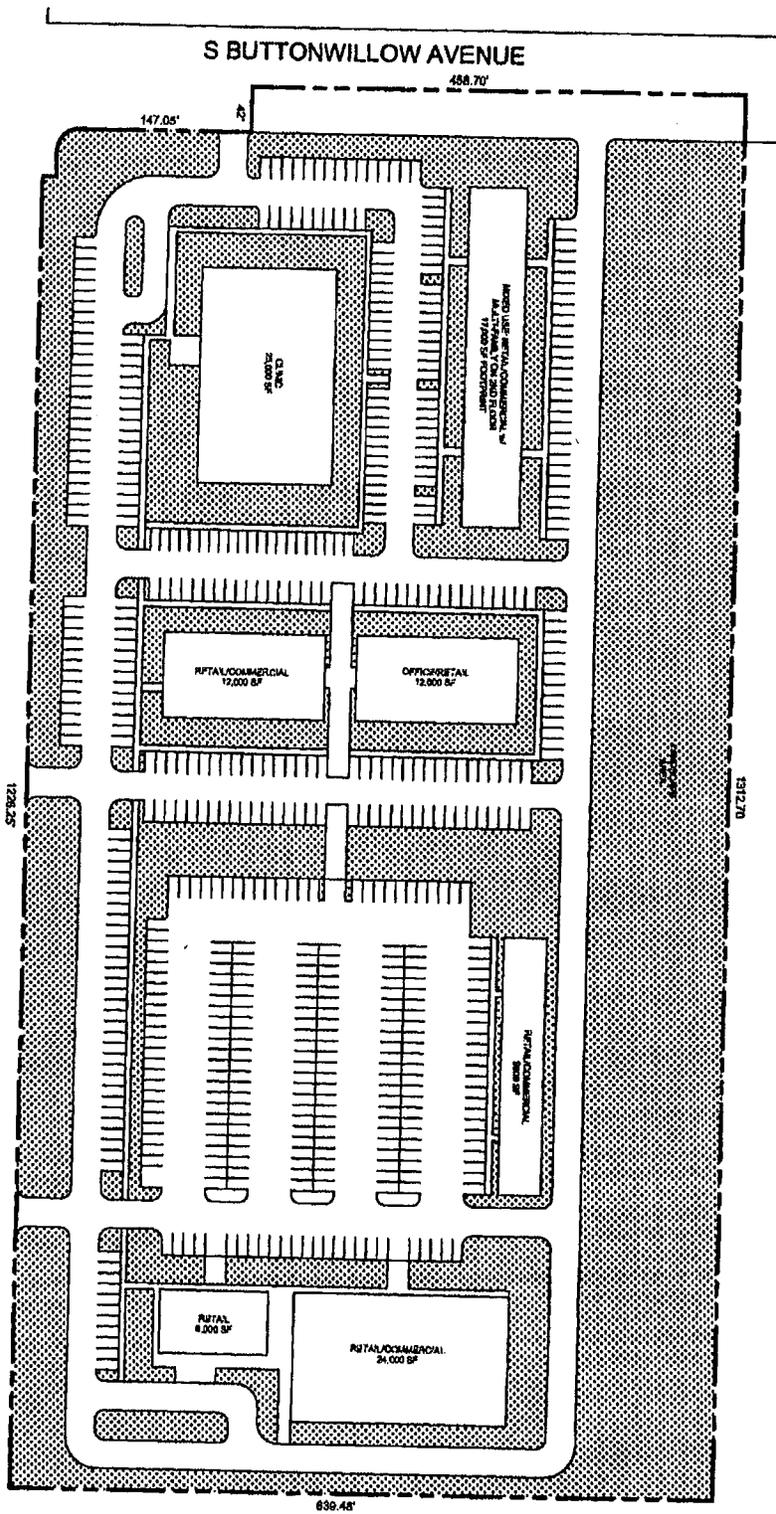
Legend

-  Proposed Pre-Zoning: CC Central and Community Commerical
-  Reedley City Limits
-  Reedley Sphere of Influence



date: 07.03.2017

UHC Reedley Clinic | Master Site Plan



LAND USE	AREA	PARKING
CLINIC	24,000 SF	375 REQUIRED
OFFICE/RETAIL	17,000 SF	600 PROVIDED
RETAIL/COMMERCIAL	12,000 SF	
RETAIL/COMMERCIAL	69,800 SF	

R E C E I V E D
 JUL 5 2017
 CITY OF REEDLEY
 COMMUNITY DEVELOPMENT DEPT.

EXHIBIT: 3
 APP #: EA 2017-7
 DATE: 7/5/2018
 APPROVED: *[Signature]*

the neenan company
 1"=100'

EXHIBIT A

INITIAL STUDY, USING A CEQA GUIDELINES APPENDIX G CHECKLIST

analyzing a subsequent project under City of Reedley, certified Program Environmental Impact Report (SCH No. 2010031106) prepared for the Reedley General Plan Update 2030

Environmental Assessment No. 2017-7

April 26, 2018

1. **Project title:** Manning-Buttonwillow Reorganization
Annexation Application No. 2017-2
Pre-Zone Application No. 2017-2
Site Plan Review Application No. 2017-3

2. **Lead agency name and address:**

City of Reedley
Community Development Department
1733 Ninth Street,
Reedley, California 93654

3. **Contact person and phone number:**

Ellen Moore, Associate Planner
Community Development Department
1733 Ninth Street,
Reedley, California
(559) 637-4200 ext. 222

e-mail ellen.moore@reedley.ca.gov

4. **Project location:** Site Latitude: 36°36'15.984"N
Site Longitude: 119°25'49.9224"W

Assessor's Parcel Number: 363-070-49 (19.076 gross acres)

5. **Project applicant/sponsor name and address:**

United Health Centers of San Joaquin Valley
650 Zediker Avenue
Parlier, CA 93648

6. **General plan designation:**
Existing: Community Commercial

7. **Zoning:**
Existing: AL-20 (Limited Agricultural)
Proposed Pre-Zoning: CC (*Central and Community Commercial*) Zone District

8. **Description of project:**

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9. **Surrounding land uses and setting::**

	Planned Land Use	Existing Zoning	Existing Land Use
North	Medium Density Residential	AL-20 (Limited Agricultural) Outside City Limits	Agricultural land
East	Community Commercial	AL-20 (Limited Agricultural) Outside City Limits	Agricultural land & Rural Homestead
South	Neighborhood Commercial & Light Industrial	CN (Neighborhood Commercial) & ML (Light Industrial) Zone Districts	Existing Commercial & Light Industrial Businesses
West	Community Commercial	CC (Central and Community Commercial)	Existing Commercial Shopping Center

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

County of Fresno (MOU Consistency Letter)
 Fresno County Fire Protection District
 Kings River Conservation District

The Fresno Local Agency Formation Commission (LAFCo), whose role is to consider changes of organizations and spheres of influence, is a Responsible Agency under CEQA for this project. LAFCo will take action on this annexation request by the City of Reedley.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

A Formal Notification of Determination that a Project Application is Complete and Notice of Consultation Opportunity was delivered on September 11, 2017. To the date of the preparation of this initial study, there was no request for consultation received by the City of Reedley.

NOTE: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

Pursuant to Public Resources Code Section 21001.1 and 21080, the purpose of this initial study is to analyze the potential environmental impacts of the project, to determine whether the project would have a significant adverse environmental impact requiring preparation of and Environmental Impact Report, or whether adverse impacts may be mitigated below a level of significance with features incorporated into a project and imposition of mitigation measures.

It is noted that the environmental setting for this project and a range of potential environmental impacts of development and use of land in the City of Reedley Sphere of Influence were described in the Program Environmental Impact Report (PEIR) certified in 2014.

Environmental factors checked below would be potentially affected by this project, although none of the impacts would be potentially significant with application of project-specific mitigation measures:

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology /Soils
<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Hazardous Materials	<input type="checkbox"/> Hydrology/Water Quality
<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Noise

<input type="checkbox"/>	Population /Housing	<input type="checkbox"/>	Public Services	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Transportation/Traffic	<input type="checkbox"/>	Utilities/Service Systems	<input type="checkbox"/>	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that, although some aspects of these activities that would be allowed subsequent to the proposed project could have some adverse effects on the environment, those effects would not result in a significant adverse effect because revisions in the project have been made and project-specific mitigation measures will be applied, as agreed to by the project proponent. I further find that the project will not have additional significant adverse effects on the environment beyond those identified in the City of Reedley, certified Program Environmental Impact Report, prepared for the Reedley General Plan Update 2030.

Therefore, A MITIGATED NEGATIVE DECLARATION will be prepared.

X Ellen Moore 4/26/18
 Ellen Moore, Associate Planner April 26, 2018
 Community Development Department

EVALUATION OF ADDITIONAL ENVIRONMENTAL IMPACTS:

1. For purposes of this Initial Study, the following answers have the corresponding meanings:
 - a. "No Impact" means the subsequent project will not cause any additional significant effect related to the threshold under consideration which was not previously examined in the PEIR.
 - b. "Less Than Significant Impact" means there is an impact related to the threshold under consideration that was not previously examined in the PEIR, but that impact is less than significant;
 - c. "Less Than Significant with Mitigation Incorporation" means there is a potentially significant impact related to the threshold under consideration that was not previously examined in the PEIR, however, with the mitigation incorporated into the project, the impact is less than significant.
 - d. "Potentially Significant Impact" means there is an additional potentially significant effect related to the threshold under consideration that was not previously examined in the PEIR.
2. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

3. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
4. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
5. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
6. Earlier analyses may be used where, pursuant to the tiering, PEIR or MIER, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in the PEIR or another earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
7. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
8. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
9. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
10. The explanation of each issue should identify:
 - a. The significance criteria or threshold, if any, used to evaluate each question; and
 - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

The 2013 PEIR found no significant impacts to scenic vistas in the project area from future buildout of the General Plan in the project area. The project would not adversely affect scenic vistas or scenic resources in the City of Reedley, because the project is an in-fill development project that is surrounded on two sides by buildings of similar height, mass and bulk. The subject property does not include any scenic resources such as trees, rock outcroppings, or historic structures. The subject territory would not damage any scenic resources nor would it degrade the visual character or quality of the site and its surroundings. Furthermore, development of the subject territory will not create a new source of substantial light or glare which would affect day or night time views in the project area, given that during the entitlement process, staff would ensure that lights are located in areas that will minimize light sources.

Compliance with the zoning regulations and implementation of the 2030 General Plan's proposed policies would reduce the impacts to visual character associated with the project to a less than significant level.

Therefore, no project-specific mitigation for aesthetics impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>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?</p>			X	
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>			X	
<p>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))?</p>				X
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>				X
<p>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?</p>			X	

In general the loss of viable agricultural cop land is considered a "significant" adverse impact. Development of a city's General Plan and establishment of the urban Sphere of Influence of a city typically involves the establishment of programs, policies and standards to minimize these impacts to the maximum degree feasible and that the benefits resulting from the comprehensive planning approach balances the need for urban growth against adverse effects of urban encroachment onto agricultural resource areas.

The Reedley 2030 General Plan contains a range of policies which would minimize the potential for premature conversion of important farmland within the proposed SOI. These policies include:

- LU 2.5.2 New development opportunities in the City shall be sequential and contiguous to existing development to ensure the orderly extension of municipal services and unnecessary conversion of agricultural land. Development standards shall incorporate measures to protect and preserve agricultural land.
- LU 2.5.7 Require contiguous development within the Sphere of Influence unless it can be demonstrated that the development of contiguous property is infeasible. An analysis of the fiscal, public utilities, surface transportation and service impacts shall be required as part of the application to annex new territory into the City.

The approximately 19-acre property is within the Sphere of Influence and within the boundaries of the Reedley 2030 General Plan, which was analyzed in the 2013 Draft Program EIR and Recirculated Program EIR. The majority of the subject site is designated as "Prime Farmland" and a small portion is designated as "Urban and Built-Up Land" on the Fresno County Important Farmland 2014 Map, Rural Land Mapping Edition, and Program Environmental Impact Report, Figure 6, Important Farmland Map. According to both maps, the project location is substantially surrounded on two sides by "Urban and Built-Up Land".

The property is directly adjacent on two sides to built-up area within Reedley City Limits, and contiguous property consists of urban and built-up land. Approval of Annexation Application No. 2017-2, Pre-Zone Application No. 2017-2, and Site Plan Review Application No. 2017-3 would constitute infill development which would prevent potential cumulative consumption of agricultural land for additional development in the City of Reedley.

The parcels within the subject territory are not known to be under Williamson Act contract, and not surrounded by sites under a Williamson Act contract. The proposed Annexation Application No. 2017-2, Pre-Zone Application No. 2017-2, and Site Plan Review Application No. 2017-3 does not conflict with any forest land or Timberland Production or result in any loss of forest land because there is no land located within the City, within the existing SOI, or within the proposed expanded SOI that is zoned as forest land or timberland. Therefore, the project would have no impact on forest land.

Given the extent of urban uses to the west and south of the project site, other changes in the existing environment that could result in conversion of Farmland to non-agricultural use would be less than significant because Reedley has historically taken a conservative approach to expansion of the Reedley City Limits, thus avoiding premature conversion of farmland.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements PEIR mitigation measures relating to agricultural land preservation (AG-1 & AG-2), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for agricultural and forestry resources is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY AND GLOBAL CLIMATE CHANGE - Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan (e.g., by having potential emissions of regulated criterion pollutants which exceed the San Joaquin Valley Air Pollution Control Districts (SJVAPCD) adopted thresholds for these pollutants)?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		X		
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	

An Air Quality & Greenhouse Gas Impact Assessment was prepared for the project by VRPA Technologies, Inc., dated March 2018, and is attached to this initial study (Attachment 4). An executive summary of the assessment is provided below:

The primary way of determining consistency with the air quality plan's (AQP's) assumptions is determining consistency with the applicable General Plan to ensure that the Project's population density and land use are consistent with the growth assumptions used in the AQPs for the air basin.

As required by California law, city and county General Plans contain a Land Use Element that details the types and quantities of land uses that the city or county estimates will be needed for future growth, and that designate locations for land uses to regulate growth. Fresno COG uses the growth projections and land use information in adopted general plans to estimate future average daily trips and then VMT, which are then provided to SJVAPCD to estimate future emissions in the AQPs. Existing and future

pollutant emissions computed in the AQP are based on land uses from area general plans. AQPs detail the control measures and emission reductions required for reaching attainment of the air standards.

The applicable General Plan for the Project is the City of Reedley General Plan, which was adopted in 2014. The Project is consistent with the currently adopted General Plan for the City of Reedley and is therefore consistent with the population growth and VMT applied in the plan. Therefore, the Project is consistent with the growth assumptions used in the applicable AQPs. As a result, the Project will not conflict with or obstruct implementation of any air quality plans, thus creating a less than significant impact.

Tables 7 and 8 of the Air Quality and Greenhouse Gas Impact Assessment show the estimated construction emissions using CalEEMod that would be generated from the development of the Project with the implementation of the SJVAPCD applicable Regulation VIII control measures.

Table 7
Phase 1 Project Construction Emissions (tons/year)

Summary Report	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Project Construction Emissions Per Year	3.90	6.27	0.80	0.01	1.75	1.07
SJVAPCD Level of Significance	100	10	10	27	15	15
Does the Project Exceed Standard?	No	No	No	No	No	No

Source: CalEEMod 2016.3.1

Table 8
Phase 2 Project Construction Emissions (tons/year)

Summary Report	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}
Project Construction Emissions Per Year	4.07	4.17	1.28	0.01	1.52	0.80
SJVAPCD Level of Significance	100	10	10	27	15	15
Does the Project Exceed Standard?	No	No	No	No	No	No

Source: CalEEMod 2016.3.1

Source: VRPA Technologies, Inc. page 36

The construction emissions are therefore considered less than significant with the implementation of the SJVAPCD applicable Regulation VIII control measures (MM AQ-1), which are provided below.

1. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.
2. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.
3. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.
4. When materials are transported off-site, all 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.
5. All 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.
 6. 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.
 7. Within urban areas, track out shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.

The proposed Project's construction phase may cause asbestos to become airborne due to the construction activities that will occur on site. In order to control naturally-occurring asbestos dust, the Project will be required to submit a Dust Control Plan under the SJVAPCD's Rule 8021 (MM AQ-2). The Dust Control Plan may include the following measures:

1. Water wetting of road surfaces
2. Rinse vehicles and equipment
3. Wet loads of excavated material, and
4. Cover loads of excavated material

Tables 10 summarize the Project's operational impacts by pollutant. Results indicate that the annual operational emissions from Phase 1 of the Project will be less than the applicable SJVAPCD emission thresholds for criteria pollutants (shown in Table 9, page 37 of the Air Quality Assessment). However, operational emissions from the entire 19-acre site will exceed the SJVAPCD emissions threshold for NOx emissions by 1.56 tons/year.

Table 10
Phase 1 and 2 Project Operational Emissions (tons/year)

Summary Report	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}	CO _{2e}
Project Operational Emissions Per Year	7.27	11.63	1.45	0.05	2.92	0.81	5,142.37
Nectarine Orchard Emissions Per Year	0.42	0.07	—	—	0.44	0.05	—
Net Project Operational Emissions Per Year	6.85	11.56	1.45	0.05	2.48	0.76	5,142.37
SJVAPCD Level of Significance	100	10	10	27	15	15	None
Does the Project Exceed Standard?	No	Yes	No	No	No	No	No

Source: CalEEMod 2016.3.1

Source: VRPA Technologies, Inc. page 37

Compliance with Rule 9510 will reduce Project Operational NOx Emissions by 33.3% and PM10 emissions by 50% according to the SJVAPCD's Guidance for Assessing and Mitigating Air Quality Impacts adopted in March 2015 (SJVAPCD 2015). This reduction will alleviate Project impacts to the SJVAPCD's threshold for NOx emissions as noted in Table 15 below.

Table 15
Phase 1 and 2 Project Operational Emissions with Rule 9510 (tons/year)

Summary Report	CO	NO _x	ROG	SO _x	PM ₁₀	PM _{2.5}	CO _{2e}
Project Operational Emissions Per Year	7.27	11.63	1.45	0.05	2.92	0.81	5,142.37
Neetarine Orchard Emissions Per Year	0.42	0.07	—	—	0.44	0.05	—
Net Project Operational Emissions Per Year	6.85	7.71	1.45	0.05	1.24	0.76	5,142.37
SJVAPCD Level of Significance	100	10	10	27	15	15	None
Does the Project Exceed Standard?	No	No	No	No	No	No	No

Source: CalEEMod 2016.3.1

Source: VRPA Technologies, Inc. page 45

Therefore, the project's construction emissions are therefore considered less than significant with the implementation of the San Joaquin Valley Air Pollution Control District Rule 9510, Indirect Source Review (MM AQ-3) during Phase 2 of the project.

Fresno County is nonattainment for Ozone (1 hour and 8 hour) and PM10 (State standards) and PM2.5. The SJVAPCD has prepared the 2013 Ozone Plan, 2007 PM10 Maintenance Plan, and 2012 PM2.5 Plan to achieve Federal and State standards for improved air quality in the SJVAB regarding ozone and PM. Inconsistency with any of the plans would be considered a cumulatively adverse air quality impact. As discussed in Section 4.1.1, the Project is consistent with the currently adopted General Plan for Fresno County and is therefore consistent with the population growth and VMT applied in the plan. Therefore, the Project is consistent with the growth assumptions used in the 2013 Ozone Plan, 2007 PM10 Maintenance Plan, and 2012 PM2.5 Plan.

Results of the CALINE analysis (Section 3.3.2 of the Assessment) show that the intersections of Buttonwillow Avenue at Manning Avenue, Buttonwillow Avenue at Dinuba Avenue, and Zumwalt Avenue at Manning Avenue are expected to generate CO concentrations that would not exceed the federal or state 1-hour and 8-hour standards. Further, as indicated in Section 3.3.2, the Project would not create objectionable odors affecting a substantial number of people. The Project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Therefore, the project would have a less than significant impact on net increases of any criteria pollutant.

Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses that have the greatest potential to attract these types of sensitive receptors include schools, parks, playgrounds, daycare centers, nursing homes, hospitals, and residential communities. From a health risk perspective, the Project is a Type B Project in that it may potentially place sensitive receptors in the vicinity of existing sources.

The first step in evaluating the potential for impacts to sensitive receptors for TAC's from the Project is to perform a screening level analysis. For Type B Projects, one type of screening tool is found in the CARB Handbook: Air Quality and Land Use Handbook: A Community Perspective. This handbook includes a table (depicted in Table 4) with recommended buffer distances associated with various types of common sources. The screening level analysis for the Project shows that TAC's are not a concern based upon the recommendations provided in Table 4. An evaluation of nearby land uses shows that the Project will not place sensitive receptors in the vicinity of existing toxic sources. Since the Project is not located within the recommended buffer distances associated with the sources found in Table 4, the Project will not expose sensitive receptors to substantial pollutant concentrations. Therefore, the project

would have a less than significant impact on exposing sensitive receptors to substantial pollutant concentrations.

The proposed Project will not generate odorous emissions, but will attract people to its site for medical and retail purposes. As a result, the Project will not be evaluated for its potential to place sensitive receptors near existing odor sources.

The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. The SJVAPCD has identified some common types of facilities that have been known to produce odors in the SJV Air Basin. The types of facilities that are known to produce odors are shown in Table 5 above along with a reasonable distance from the source within which, the degree of odors could possibly be significant. None of the facilities shown in Table 5 fit the characteristics of the Project.

Based on the assessment above, the Project will not generate potential odorous emissions or attract receivers and other sensitive receptors near existing odor sources. Therefore the project would have a less than significant impact on creating objectionable odors affecting a substantial number of people.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to air quality (AQ-1 & AQ-2), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Project Specific Mitigation Measures

- MM AQ-1. Project specific mitigation shall be in compliance with the San Joaquin Valley Air Pollution Control District Regulation VIII control measures, as identified in the attached Exhibit B, Project Specific Mitigation Monitoring Checklist, dated April 26, 2018.
- MM AQ-2. Project specific mitigation shall be in compliance with the San Joaquin Valley Air Pollution Control District Rule 8021 (Dust Control Plan), as identified in the attached Exhibit B, Project Specific Mitigation Monitoring Checklist, dated April 26, 2018.
- MM AQ-3. Project specific mitigation shall be in compliance with the San Joaquin Valley Air Pollution Control District Rule 9510 (Indirect Source Review), as identified in the attached Exhibit B, Project Specific Mitigation Monitoring Checklist, dated April 26, 2018.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional project would not adversely habitat, wetlands, plants or wildlife, migratory routes, conservation plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
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?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	

The project lies within the scope of the 2013 Draft Program EIR for the Reedley 2030 General Plan. As identified in Figure 8 of the DPEIR, a small portion of the site is developed area, and the remaining portion of the site is identified as agricultural croplands. Generally speaking, excluding untilled property margins, there would be limited biological value expected within agricultural croplands, primarily due to their intensive, regular disturbance regime. The project would not adversely affect habitat, wetlands, plants or wildlife, migratory routes, conservation plans, or other biological resources because no known resources of this type exist on the premises. There is no known threatened or endangered plant or animal species, or migratory fish or wildlife species on the site. Nor is there any wetland, riparian or other sensitive habitats on the site. The proposed development would not interfere with a tree preservation policy or ordinance, or conflict with any habitat conservation or natural community conservation plan.

Because this subject property is located within and adjacent to an urbanized area of Reedley, the project would have a less than significant impact on any protected habitat, wetlands, plants or wildlife, migratory routes, conservation plans, or other biological resources because no known resources of this type exist on the premises. The subject property has no vegetation or wetlands to provide habitat.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to biological resources (BIO-1), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for biological impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X	
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
d) Disturb any human remains, including those interred outside of formal cemeteries?			X	

The project lies within the scope of the 2013 Draft Program EIR for the Reedley 2030 General Plan. As identified in the DPEIR, there are no structures which exist on or within the immediate vicinity of the site that are listed on, or considered to be eligible for the National or Local Register of Historic Places, and the subject site is not within either a designated or proposed historic district. As such, this project would have a less than significant impact on any cultural resources.

There is no evidence that cultural resources of any type (including historical, archaeological, paleontological, or unique geologic features) exist within the subject territory. Past record searches for the region have not revealed the likelihood of cultural resources on the subject property or in its immediate vicinity. However, because of the slight possibility of hidden archeological or paleontological resources that may be uncovered during excavation required for this development, the project will adhere to the protocols established in CEQA and the PEIR to address delayed discovery of such resources.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to cultural resources (CR-1 – CR-4), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for cultural impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	

The project lies within the scope of the 2013 Draft Program EIR for the Reedley 2030 General Plan. As identified in the DPEIR, the City of Reedley and the surrounding County of Fresno area has no known active earthquake faults, and is not in any Alquist-Priolo Special Studies Zone. The immediate Fresno area has extremely low seismic activity levels, although shaking may be felt from earthquakes whose epicenter lie to the east, west, and south. Known major faults are over 50 miles away and include the San Andreas Fault, Coalinga area blind thrust fault(s), the Long Valley, Ownes Valley, and White Wolf/Tehachapi fault systems. The most serious threat to Reedley from a major earthquake in the Eastern Sierra would be flooding that could be caused by damage to dams on the upper reaches of the San Joaquin River. Since the project site, like the entire City of Reedley, is located on the level San Joaquin Valley floor, risks from landslides would generally be minimal and potential impacts on new development would remain less than significant.

As identified in the DPEIR, soil types located within the proposed SOI generally have low to moderate potential for water and wind erosion. Moderately expansive soils, including soils in the Ramona (Rb; Rc) series that exist on this project site, would usually cause damage only to substandard structures and to flatwork such as streets and patios. In addition, foundations can usually be especially engineered to minimize damage due to these moderately expansive soils. The project would tie into the City of Reedley's existing waste water system, so the use of septic tanks or alternative waste water disposal systems would not be necessary.

The GPU contains a range of goals and policies which will serve to mitigate potential soil erosion impacts to a less than significant level. The most important of these includes the following policies:

SE 5.2.1 Proposed development projects may be subject to a variety of discretionary action and conditions of approval. The actions and conditions are based on adopted City plans and policies essential to mitigate adverse effects on the environment including the health, safety, and welfare of the community. For example, the City may require preliminary soil (Reedley Municipal Code, Section 11-4-2-D), geotechnical or seismic reports when the subject property is located on land exhibiting potentially unstable soil conditions, suitability for additional development, or other hazardous geologic conditions.

SE 5.2.2 Development should be prohibited in areas where corrective measures to affect the geologic hazard are not feasible.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to geology and soils (GEO 1 – GEO 4), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for geology and soils impacts is required.

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

As shown in Table 12, the Project would generate 6,912.01 Metric Tons of Carbon Dioxide Equivalent per year (MTCO₂eq./year) using an operational year of 2005, which includes area, energy, mobile, waste, and water sources. "Business as usual" (BAU) is referenced in CARB's AB 32 Scoping Plan as emissions projected to occur in 2020 if the average baseline emissions during the 2002-2004 period grew to 2020 levels, without control or Best Performance Standards (BPS) offsets. As a result, an estimate of the Project's operational emissions in 2005 were compared to operational emissions in 2020 in order to determine if the Project meets the 29% emission reduction. The SJVAPCD has reviewed relevant scientific information related to GHG emissions and has determined that they are not able to determine a specific quantitative level of GHG emissions increase, above which a project would have a significant impact on the environment, and below which would have an insignificant impact. As a result, the SJVAPCD has determined that projects achieving at least a 29% GHG emission reduction compared to BAU would be determined to have a less than significant individual and cumulative impact for GHG. Results of the analysis show that the Project's GHG emissions in the year 2020 is 6,446.97 MTCO₂eq./year. This represents an achievement of 7% GHG emission reduction on the basis of BAU, which does not meet the 29% GHG emission reduction target.

Table 12
2005/2020 Phase 1 and 2 Operational Greenhouse Gas Emissions

Summary Report	CO ₂ e
Operational Emissions Per Year (2005)	6,912.01 MT/yr
Operational Emissions Per Year (2020)	6,446.97 MT/yr
SJVAPCD Level of Significance	29% Reduction Compared to BAU
Does the Project Meet the Standard?	No

Source: CalEEMod 2016.3.1

Source: VRPA Technologies, Inc. page 42

In the event that a local air district's guidance for addressing GHG impacts does not use numerical GHG emissions thresholds, at the lead agency's discretion, a neighboring air district's GHG thresholds may be used to determine impacts. On December 5, 2008, the South Coast Air Quality Management District (SCAQMD) Governing Board adopted the staff proposal for an interim GHG significance threshold for projects where the SCAQMD is lead agency. The SCAQMD guidance identifies a threshold of 10,000 MTCO₂eq./year for GHG for construction emissions amortized over a 30-year project lifetime, plus annual operation emissions. This threshold is often used by agencies, such as the California Public Utilities Commission, to evaluate GHG impacts in areas that do not have specific thresholds (CPUC 2015). Therefore, because this threshold has been established by the SCAQMD in an effort to control GHG emissions in the largest metropolitan area in the State of California, this threshold is considered a conservative approach for evaluating the significance of GHG emissions in a more rural area, such as Madera County. Though the Project is under SJVAPCD jurisdiction, the SCAQMD GHG threshold provides some perspective on the GHG emissions generated by the Project. Tables 13 and 14 shows the yearly GHG emissions generated by the Project, which is approximately 88% less than the threshold identified by the SCAQMD for Phase 1 operations and 48% for Phase 1 and 2 operations.

Table 13
Phase 1 Project Operational Greenhouse Gas Emissions

Summary Report	CO ₂ e
Project Operational Emissions Per Year	1,133.44 MT/yr

Source: CalEEMod 2016.3.1

Table 14
Phase 1 and 2 Project Operational Greenhouse Gas Emissions

Summary Report	CO ₂ e
Project Operational Emissions Per Year	5,169.46 MT/yr

Source: CalEEMod 2016.3.1

Source: VRPA Technologies, Inc. page 42

Based on the assessment above, the Project will have a less than significant impact on the generation of greenhouse gas emissions.

As required by California law, city and county General Plans contain a Land Use Element that details the types and quantities of land uses that the city or county estimates will be needed for future growth, and that designate locations for land uses to regulate growth. FCOG uses the growth projections and land use information in adopted general plans to estimate future average daily trips and then VMT, which are then provided to SJVAPCD to estimate future emissions in the AQPs. Existing and future pollutant emissions computed in the AQP are based on land uses from area general plans. AQPs detail the control measures and emission reductions required for reaching attainment of the air standards.

The applicable General Plan for the Project is the City of Reedley General Plan, which was adopted in 2014. The Project is consistent with the currently adopted General Plan for the City of Reedley and is

therefore consistent with the population growth and VMT applied in the plan. Therefore, the Project is consistent with the growth assumptions used in the applicable AQPs.

Based on the assessment above, the Project will further the achievement of the City's greenhouse gas reduction goals and will not conflict with applicable plans, policies or regulations adopted for the purpose of reducing the emissions of greenhouse gases. Therefore, the project would have a less than significant impact on the environment in regards to GHG reduction plan, policy or regulation conflicts.

Therefore, no project-specific mitigation for greenhouse gas emissions impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIAL -- Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X

All existing and future development within the City will continue to be bound by County, state and federal regulations regarding the transportation, storage, use and handling of hazardous materials. Through implementation of Reedley 2030 General Plan Policies, enforcement of the City's related zoning regulations, County, state, and federal enforcement of the hazardous materials regulations for which they are responsible, and implementation of the City's emergency operations plan in the event of a hazardous materials release incident, impacts on public health and safety from use and/or accidental release of hazardous materials would be reduced to a less than significant level. In light of the noted policy mitigations and regulatory requirements, risks from release of hazardous emissions within one-quarter mile of a school site would be less than significant.

The project is not located on a known hazardous materials site, nor is it located in close proximity to one. Risks to public health and safety from development on or in the vicinity of this project site would be less than significant.

The subject property is not located in any airport safety area, private airstrip, or adjacent to any freight rail lines. Urban areas have overhead and buried power, gas, rail and communication utility lines. Regulations require that contractors verify precise locations of these lines and avoid damaging them during construction activities; again, environmental assessment can rely on compliance without specific additional mitigation.

The City's emergency operations plan has recently been updated to reflect response plans for a range of emergency situations that are relevant to conditions in the Reedley area. Development of this project site should not differ substantially in terms of its character or types of emergency situations that could arise from it, the potential impact of impairing implementation or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

There are no wildland areas near the project, therefore the project would have no impact related to exposing people or structures to a significant risk of loss, injury or death involving wildland fires.

Therefore, no project-specific mitigation for hazardous materials and hazardous facilities impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY -- Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, 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?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
e) 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?			X	
f) Otherwise substantially degrade water quality?			X	
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
j) Inundation by seiche, tsunami, or mudflow?			X	

Water Supply, Water Treatment and Delivery Maintenance

The City of Reedley lies directly over the Kings Basin from which the City extracts its domestic water supply. The Kings Basin is a large groundwater subbasin located within the southern part of the San Joaquin Valley Basin, in the Central Valley of California. The groundwater basin covers an area of 1,530 square miles.

The City of Reedley depends entirely on groundwater pumping from the Kings Basin. The topography of the Reedley area is relatively flat, and the primary slopes within the SOI are those found within the Kings River corridor. Subsurface lateral movement of runoff from the Sierra Nevada Mountains to the east and some general surface runoff in creeks, irrigation ditches and open space, percolation ponds and the Kings River are all a source of replenishment of the groundwater table. The City's groundwater supply is pumped from wells located entirely on the eastern side of the Kings River. The City does not pump or operate any groundwater wells on the westerly side of the Kings River.

The City has historically provided domestic water supply solely through groundwater extraction. The City operates seven active domestic supply water wells that pump water directly into the water system which includes approximately 82 miles of pipeline and three elevated storage tanks (2015 UWMP page 34). It is common practice for the City to drill its water production wells at depths greater than 800-feet to ensure sufficient supply and meet State Water Quality standards. This is because water quality in the Kings Basin is generally very good and groundwater quality in the Reedley vicinity is also generally good. In the City of Reedley 2016 Water Quality Report, the City reported that after testing for over 100 constituents, the City's groundwater supply met all health related standards established by the California Department of Public Health, and the U.S. Environmental Protection Agency. According to the 2015 UWMP, the City manages water quality risks by monitoring contaminants to maintain that concentrations remain below the required MCL, as well as other regulatory health-based objectives, when feasible (page 35).

In 2012, the City used 1,632,000,000 gallons of water (City of Reedley, 2012 Water Quality Report). In 2013, the City used 1,597,000,000 gallons of water (City of Reedley, 2013 Water Quality Report). In 2014, the City used 1,498,000,000 gallons of water (City of Reedley, 2014 Water Quality Report). In 2015, the City used 1,302,000,000 gallons of water (City of Reedley, 2015 Water Quality Report). In 2016, the City used 1,365,000,000 gallons of water (City of Reedley, 2016 Water Quality Report). This data shows that over the past few years, water usage within the City has decreased.

To satisfy the provisions of SB X7-7, the City must establish a per capita water use target for the year 2020 as well as an interim target. In 2015 the City's daily per capita water use was determined to be 139 GPCD, which is less than the 2015 Interim Target of 242 GPCD and Confirmed 2020 target of 215 GPCD. Therefore, the City has met their 2015 per capita water use and is already on track to meet the Confirmed 2020 Target (2015 UWMP 2015, Section 5.8.1, page 32).

Through the Reedley Municipal Code (RMC) the City has implemented regulations for the conservation of potable water. Pursuant to RMC, Water Conservation, Section 8-1-12(A), the goals of this section are to minimize water use and reduce unnecessary use of potable water supplies. This section of the code provides a definition of "waste of water", irrigation design guidelines, watering schedules and the enforcement process and penalties.

The GPU goals, policies, RMC and supporting plans (UWMP) represent an effort to effectively manage a valued resource. To effectively manage this finite resource the GPU includes numerous goals and policies promoting public education, transparency, conservation and collaboration with other governmental agencies. Implementation of all of these water polices will not wholly mitigate the critical overdraft of the Kings Basin. However, the collective Public Utilities Goals and Policies were specifically designed as a comprehensive set of tools to ensure the avoidance of a critical overdraft and ensure the City's diligent oversight, management and use of a finite water resource.

After taking into account the City's immediate efforts to implement the General Plan policies that would further reduce its consumptive use, and/or applying any building standards related to low flow fixtures, it was concluded the project would have a less than significant impact.

Wastewater Management

The City currently operates its own wastewater treatment plant (WWTP) located at 1701 West Huntsman Avenue, Reedley, California. The WWTP Phase 1 project was completed which expanded the plant's capacity to 5.0 million gallons per day (mgd) and constructed new percolation ponds. The waste water plant has also been designed to readily expand to a total capacity of 7.0 mgd. At total plant build-out the plant could accommodate the anticipated growth for the next 20 years. The plant is currently operating at approximately 2.3 mgd.

Additionally the WWTP site contains three additional stormwater basins. According to the City of Reedley, Waste Water Treatment Plant Draft Environmental Impact Report (2006), "New percolation ponds (approximately 20 acres total) will be constructed within the WWTP boundary, and will enable the plant to continue to provide 100 percent effluent reclamation via percolation" (Page 2-7). It is also noteworthy that part of the City's permit for the WWTP is that the City is required to discharge effluent reclamation waters between October and May, into three specific ponding basins for recharge purposes. According to WWTP records, the five-year average of effluent discharge used for percolation purposes is 704.4 million gallons; and, in 2012, 654.0 million gallons were discharged into these percolation ponds for groundwater recharge.

According to orders and permits issued by the California Water Quality Control Board for the City's WWTP, certain limits have been placed on discharge flows to percolation ponds and the Kings River. The WWTP is limited to a monthly average discharge flow of 3.5 million gallons per day (mgd) of waste water to approximately 39 acres of percolation ponds. The City is also limited to a monthly average discharge flow of 1.75 mgd of waste water into the Kings River. According to the Alta Irrigation District's Amended Groundwater Management Plan (2010), "effluent discharge by the City of Reedley ('Agency') from its sewer treatment plant into the Kings River should not be considered to be the prohibited exportation of groundwater, if such effluent recharges or benefits underground supplies available to landowners in the District".

Drainage, Stormwater Management and Flood Control

Storm water flows into street collection systems and enters the storm drain inlets where it is conveyed through sub-surface drainage piping to one of several storm water retention basins located throughout the City of Reedley. The design of the storm drainage collection system is based upon the peak flow that the pipeline collection system can carry and the topographic slope (or gradient) available in the area. The design of a storm water retention basin is based upon the total volume of runoff that the retention basin must be capable of storing. The estimate of peak flow and total runoff volumes includes calculations utilizing hydrological principals.

The City has ten drainage zones, nine permanent storm water retention basins, underground storm drains, storm drain inlets, a drainage ditch, and a pump station distributed throughout the City. For example, the Buttonwillow Irrigation Ditch is located on the east side of the City. Storm drains also carry water to one of three retention basins. The Camacho Park Retention Basin is located at the northeast corner of North Avenue and Columbia. Another retention basin is located at the end of Hemlock Avenue and Curtis Avenue, adjacent to the Reedley Parkway. Both of these retention basins are designed to use gravity to fill with water. Storm water is collected in these basins and percolates through the soil or evaporates into the air. The third retention basin is located at the intersection of Washington Avenue and Carolyn Lane. Storm water from this basin is pumped to an irrigation canal. See Figure 3.2 - Map of Retention Basin Sites. In addition, the Waste Water Treatment Plant is a significant source of groundwater recharge, as previously discussed above in the Public Utilities - Waste Water section.

There are also two well-defined areas in the City of Reedley that collect stormwater runoff, which flows directly to Alta Irrigation District (AID) facilities. The northern area is generally bound by Parlier,

Frankwood, Manning and Hollywood Avenues. The second area is generally bound by North, East, and Dinuba Avenues. The two areas described above consist of approximately 20 acres of land. The amount of annual flow to the AID facility could be calculated based upon the annual rainfall level.

The storm drain runoff from this 20 acre area is an indirect source of groundwater recharge for AID. The collected stormwater runoff drains into irrigation ditches and canals which are an excellent opportunity for groundwater recharge. Any runoff not absorbed through seepage is available to AID for further recharge or delivery to their customers, which in turn reduces the potential need for drawing more water from the Basin for remaining service needs.

The National Pollutant Discharge Elimination System (NPDES) program controls and reduces pollutants to water bodies from point and non-point discharges. The NPDES Phase II Storm Water Program requires separate municipal storm sewer systems to obtain a permit and develop a storm water management program designed to prevent harmful pollutants from being washed by storm water runoff into local water bodies. The program must include public education, public participation and involvement, illicit discharge detection and elimination, construction site runoff control, post-construction runoff control and pollution prevention, and good housekeeping.

The City's Stormwater Management Implementation Plan (Starr Engineering 2007), represents the five-year management strategy for controlling the discharge of pollutants to the "maximum extent practicable" in stormwater runoff from the City urban area during the first NPDES stormwater permit term. The plan was prepared in support of the City's application for a Municipal Stormwater (MS4) Permit to the Central Valley Regional Water Quality Control Board. The plan includes information on federal, state, and local storm water quality regulations, stormwater quality control strategies and programs to be implemented in Reedley, storm water quality monitoring and assessment, and plan implementation requirements. The City is currently in compliance with all State Stormwater regulations and in the process of updating its Storm Drainage Master Planning Report.

The Reedley Municipal Code, Stormwater Management Section 8-5-1, sets forth the local governing regulations for implementing stormwater quality management strategies consistent with its General Construction permit from the Central Valley Regional Water Quality Control Board. The regulations are applicable to all storm water generated on any developed or undeveloped urban land within the City or conveyed by the public storm drain system. The critical component of the regulations is as follows:

All persons engaged in activities which will or may reasonably be expected to result in pollutants entering the public storm drain system shall undertake best management practices (BMPs) to minimize such pollutants, shall provide protection from accidental discharge of pollutants to the public storm drain system and comply with cleanup and notification requirements of this chapter. Such measures shall include the requirements imposed by federal, state, county, or local authorities. BMPs are site specific and are described in the documents "Storm Water Best Management Practice Handbook: Construction"; "Storm Water Best Management Practice Handbook: New Development And Redevelopment"; "Storm Water Best Management Practice Handbook: Industrial And Commercial"; "Storm Water Best Management Practice Handbook: Municipal"; or other guidance documents available from EPA and/or RWQCB. (Reedley Municipal Code, Section 8-5-1)

To support these and other storm drainage facilities the City has created and implemented an impact fee program (Development Impact Fee Study, dated March 24, 2015). The current drainage system is comprised of street gutters and underground pipes that convey the storm event runoff to detention basins, irrigation canals and the Kings River. \$6,917,486 of the total cost constructing and maintaining the drainage system has been allocated to new development projects and is being spread to the various

land uses in proportion to their need for storm water runoff capacity based on the table of storm drainage runoff coefficients (Development Impact Fee Study, dated March 24, 2015). The development impact fee is now being charged and collected at the time a building permit is issued.

Based on a review of the project size and location, the project will not substantially alter the existing drainage pattern or cause drainage capacities to be exceeded. It is not located in a 100 year flood hazard area, nor does it propose structures within such an area. Given its location and existing infrastructure, the project does not expose people or structures to a significant risk of flooding or inundation.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to hydrology and water quality (HYD-2), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for hydrology and water quality impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING - Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

The subject property is located within the boundaries of the Reedley 2030 General Plan, which was adopted in 2014. The proposed 2030 General Plan provides guidance on future development that would occur largely within agricultural areas that are currently undeveloped. Where development would occur within the developed portions of the City, that development would largely occur on vacant infill parcels. The proposed 2030 General Plan contains a range of policies that would promote compact, orderly growth.

Buildout of the proposed project would have no impact on physically dividing an established community because it is a property with flat land and is contiguous on two sides to the existing City Limits. Implementation of the boundaries of the Reedley General Plan 2030 would not require major future infrastructure (i.e. highways) that could be perceived as a major barrier between existing developed uses or future developed uses.

The proposed project would not conflict with adopted plans or policies or regulations. The proposed 2030 General Plan was found to be consistent with the San Joaquin Valley Air Pollution Control District's air quality management plans, Fresno Council of Government's Regional Transportation Plan, and the Valley Blueprint as described in Section 1.4 of the 2013 Draft Program EIR.

As identified in the Reedley 2030 General Plan, the General Plan Planned Land Use Designation for the property is Community Commercial, which is intended to "provide a wide range of consolidated shopping opportunities near residential concentrations. Such activities in the designation serve the entire community" and "should be concentrated into unified retail centers" (Reedley 2030 General Plan, page 43). The pre-zoning for the proposed project is consistent with the GPU Planned Land Use and Zoning District Consistency Matrix (GPU, Table 2-4, Page 30).

The project is consistent with a variety of General Plan Land Use Element policies, including the following:

- LU 2.7.G Ensure adequate commercial shopping opportunities and office space to meet anticipated need for economic development.

- LU 2.7.41 Community Commercial areas should be concentrated into unified retail centers of five to forty acres in size and shall be comprehensively planned. Visual compatibility with surrounding residential neighborhoods shall be required.

- LU 2.7.42 Community Commercial designations shall be primarily at arterial/arterial or arterial/collector intersections to ensure adequate surface transportation accessibility.

The proposed pre-zoning designation of the subject property is the CC (*Central and Community Commercial*) zone district. The annexation and development of office/commercial uses are by-right uses in the CC (*Central and Community Commercial*) zone district, and certain uses are subject to a conditional use permit depending on the type and intensity of the proposed use. Therefore the proposed uses are consistent with the Reedley Municipal Code.

There are no applicable habitat conservation plans or natural community preservation plans that apply to this project, or any project within the existing or proposed Reedley Sphere of Influence.

Therefore, no project-specific mitigation for land use impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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?				X
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?				X

The Fresno County General Plan Update Background Report (Mintier & Associates 2000) provides information on the location and types of mineral resources located in the County. The Background Report shows that there are no areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists (classified as Mineral Resource Zone MRZ-2). The City has not previously or currently designated important mineral resources recovery areas within or immediately adjacent to the City.

Therefore, no project-specific mitigation for mineral resource impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE -- Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X

Noise is an important factor which can influence the quality of life in the City of Reedley. Such exposure to excessive noise levels can adversely affect human health. Therefore, we must recognize the interrelationship of the noise element to land use, housing, circulation and open space. The purpose of the General Plan Noise Element is to identify noise sources that exist within the City and proposed Planning Area. The Noise Element also establishes goals and policies to minimize potential adverse impacts from transportation and stationary noise to sensitive land uses such as residences, schools, churches and hospitals.

The methods used in the preparation of the Noise Element are defined by California Government Code Section 65302 (f) and the Guidelines for the Preparation and Contents of Noise Elements of the General Plan, adopted and published by the California Office of Noise Control (ONC). The ONC Guidelines provide definitions related to major noise sources, noise-sensitive uses (receptors), and identifies the types of major sources to be quantified. The current adopted guidelines give local governments' flexibility in identifying local levels of concern, in identifying sensitive uses, and in tailoring the noise element to local conditions.

A noise assessment was completed in Reedley in 2010 as part of the general plan update. Through that study it was determined that there are four major sources of community noise within the Planning Area: traffic on major local roadways, rail operations on the San Joaquin Valley Railroad (SJVRR), commercial/industrial facilities and aircraft operations at the Reedley Municipal Airport. Due to Reedley's location in a major agricultural area, noise from farming activities is also a concern.

According to the Government Code and ONC Guidelines, noise exposure information should be developed in terms of the Day-Night Average Level (DNL) or Community Noise Equivalent Level (CNEL) for transportation related noise sources. Analytical noise modeling techniques are typically

used to measure major noise sources (traffic and railroads) within the study area. The CNEL descriptor was developed for the quantification of aircraft noise and used to measure noise sources at the Reedley Municipal Airport. These noise sources are then quantified for evaluating their impacts on sensitive receivers and land uses. This noise element was prepared in accordance with State law, ONC and an Environmental Noise Assessment, prepared by Brown-Buntin Associates, Inc.

Noise sensitive land uses identified in the Government Code and applicable in the City of Reedley would be residential development, schools, hospitals, churches and libraries. Sensitive noise sources and receivers are listed in Table 6-1 - Noise Sensitive Receivers Reference and further illustrated on Figure 6.1 - Noise Sensitive Receivers Map (GPU, Pages 166 & 167).

Noise is generally defined as “unwanted sound”, which is a subjective determination of measureable physical phenomena. Ambient noise levels are a major determinant of “quality of life”. Noise levels not only affect the utility and enjoyment of property, they directly affect property values and affect human health.

The City Noise Element establishes a land use compatibility criterion of 60dB DNL for exterior noise levels in outdoor activity areas of new residential developments. Outdoor activity areas generally include backyards of single family residences and patios and common open space areas in multi-family developments. The intent of the exterior noise level requirement is to provide an acceptable noise environment for outdoor activities and recreation. Furthermore, the Noise Element also requires that interior noise levels attributable to exterior noise sources not exceed 45 dB DNL. The intent of the interior noise level standard is to provide an acceptable noise environment for indoor communication and sleep.

Table 6.1.2-A – Allowable City-Wide Noise Exposure

ALLOWABLE TRANSPORTATION SOURCE NOISE EXPOSURE		
	Noise Sensitive Land Uses	New Transportation Noise Sources
Indoor	45	45
Outdoor	60	60
<p>1. This table is applicable to noise sources created by either new development and/or new transportation projects.</p> <p>2. Based on an evaluation of the existing condition and proposed project, the Community Development Director may allow exterior exposure up to 65 dB DNL where practical application of construction practices has been used to mitigate exterior noise exposure.</p>		

Table 6.1.2-B - Allowable Noise Exposure

ALLOWABLE STATIONARY SOURCE NOISE EXPOSURE		
	Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 p.m. to 7 a.m.)

Hourly Leq, dBA	55	50
Maximum Level, dBA	70	65
<p>1. As determined within outdoor activity areas of existing or planned noise-sensitive uses, if outdoor activity area locations are unknown, the allowable noise exposure shall be determined at the property line of the noise sensitive use.</p> <p>2. Based on an evaluation of the existing condition and proposed project, the Community Development Director may allow exterior exposure up to 65 dB DNL where practical application of construction practices has been used to mitigate exterior noise exposure.</p>		

The City of Reedley is bisected, in part, by the Exeter Branch of the San Joaquin Valley Railroad (formerly Southern Pacific Railroad). The rail line is located on a northwest-southeast corridor through the center of Reedley. The community's major industrial belt is concentrated on both sides of the rail corridor, both through the central core and through the southeastern quadrant of the Planning Area. This combined rail and industrial corridor is the principal noise generator within Reedley. The corridor's impact on residential uses and on sensitive receivers is minimized, however, due to the attenuation provided by the existing Central Business and Service Commercial uses located immediately northeast of the tracks and by the Service Commercial strip located along the southwest side of "I" Street.

Further, practical application of construction practices and daily construction scheduling between the hours of 7:00 a.m. and 5:00 p.m. will be used to mitigate exterior noise exposure, and the project will incorporate and implement, as applicable, the PEIR mitigation measures relating to noise and General Plan Noise Element Policies. The City therefore concludes that, even if construction-related exterior noise exposure in excess of 65 dB occurs, the impacts will be intermittent and less than significant.

The project is surrounded on two sides by existing commercial/industrial development, which are not significant noise generating uses. The addition of this project, which is not a significant noise generating project, would not substantially increase existing noise levels. Therefore, the exposure to ambient noise levels or noise levels in excess of standards established in the local general plan or noise ordinance would be less than significant.

The project is not located within an airport land use plan or within two miles of an airport or private airstrip.

Relevant EIR Mitigation Measures

1. The proposed project incorporates and implements as applicable PEIR mitigation measures relating to noise (N-1), as identified in the attached Exhibit C, Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan 2030, dated February 18, 2014.

Therefore, no project-specific mitigation for noise impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING -- Would the project:				

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial 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)?			X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

On March 8, 2016, the City Council adopted the 2015-2023 Multi-Jurisdictional Housing Element. The Housing Element is intended to provide citizens, public officials, and the general public with an understanding of the housing needs in the community and set forth an integrated set of policies and programs aimed at the attainment of defined goals to meet those needs.

According to California Government Code Section 65581, it is the intent of the Legislature in enacting Housing Element Law:

- (a) To assure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goal
- (b) To assure that counties and cities will prepare and implement housing elements that, along with federal and state programs, will move toward attainment of the state housing goal
- (c) To recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the state housing goal, provided such a determination is compatible with the state housing goal and regional housing needs
- (d) To ensure that each local government cooperates with other local governments in order to address regional housing needs

The Housing Element was prepared pursuant to Sections 65580 through 65589 of the California Government Code and contains a statement of goals, policies, objectives and programs for the development of housing in the community. State housing law mandates that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law acknowledges that, in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development.

On July 22, 2016, the City of Reedley received a letter from the HCD indicating that the City of Reedley 2015-2023 Housing Element meets the statutory requirements of State housing element law. This project would help the City of Reedley implement the goals outlined in the 2015-2023 Housing Element by providing housing opportunities for current and future Reedley residents.

The City did a worst case scenario evaluation of the residential population increase that could be a result of the project. The master site plan of the project identified 17,000 square feet of commercial uses on the 1st floor of one building and multiple family units on the second floor. According to the Mixed Use Section of the Reedley Zoning Ordinance (Reedley Municipal Code Section 10-13-9), mixed use developments with a zoning designation of CC (Central and Community Commercial) must be developed in accordance with the High Density Residential Planned Land Use Designation of 15-29 dwelling units per acre. 17,000 square feet converted to acres is approximately 0.39 acres. At the highest density available in the High Density Residential Planned Land Use Designation of 29 dwelling units per acre, the project can have up to 11 dwelling units within this mixed-use area. If the average (higher) calculation for the average family size of 3.94 persons (United States Census Bureau, 2010 Census) was multiplied times the total number of proposed residential dwelling units in the project (11) it would arrive at the potential total population increase. The result would be a potential increase of 43 persons to the Reedley community.

The Proposed Project population estimate would not exceed any single year forecast as presented in the GPU, Table 2-2 Population Forecast, or any projection over a several year period. This is also assuming that all of the residential dwelling units were constructed at the same time and made available to the general public at the same time, and all of the residents came from outside Reedley and no current residents would occupy any of the proposed units.

In the worst case scenario of residential unit development, the potential increase in population would not exceed either the historic population data or population forecast that is currently represented in the General Plan Update (GPU, Table 2-1-Historic Population Data, Page 18 & Table 2-2 Population Forecast, Page 19).

The project would provide for anticipated growth (GPU, Land Use, Section 2.1, Page 18) and anticipated development consistent with the planned land use designation. Although future development would be intensifying the use of the currently undeveloped site, there is no significant distinction between the existing and proposed land use designations, which are identified in the GPU. Additionally, all future development applications must have consistency between the planned land use designation and corresponding zone district (GPU Planned Land Use and Zoning District Consistency Matrix (GPU, Table 2-4, Page 30). Properties within the vicinity of the subject territory have been developed and continue to develop at the intensity and scale designated by the GPU. Therefore, the proposed project would not either directly or indirectly induce substantial population growth in the area, nor would it displace substantial number of people.

Therefore, no project-specific mitigation for population and housing impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES --				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			X	
Fire protection?			X	
Police protection?			X	
Drainage and flood control?			X	
Parks?			X	
Schools?			X	
Other public services?			X	

The project provides for additional construction and thus would add a small increment of service demand for fire protection, wastewater treatment, police services, drainage/flood control, parks, schools, libraries, and other public services. Project conditions of approval and applying development impact fees to the project serve to mitigate any incremental impact caused by the project.

The proposed development project is required to connect to the water, sewage collection, wastewater treatment, and storm drainage systems. The small increment of additional service demand will be well within the available capacities of each of the public utility systems and thus less than significant.

Therefore, no project-specific mitigation for public service impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION --				

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

The proposed project does not remove any existing recreational facility. The proposed project is a commercial development project with a small multiple family residential component, and thus would add a small increment of service demand for recreational facilities. Project conditions of approval and applying development impact fees to the project serve to mitigate any incremental impact caused by the project.

Therefore, no project-specific mitigation for recreation impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC -- Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	T-1: Less than Significant	X		

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures or other standards established by the county congestion management agency for designated roads or highways?		X		X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				X

Reedley's surface transportation system is composed of numerous city streets, which, in some cases, connect to county roads on the peripheral of the City. Other system modalities include public transit system, fixed route transit services, paratransit services, general aviation and freight rail services. Where service is available, public transportation is utilized primarily by a transit-dependent population; i.e., the elderly, students, low-income residents and the physically handicapped. These segments of the population generally have limited access to automobiles. Implementation of the Reedley General Plan Circulation Element will improve the existing regional transportation and circulation system.

The Circulation Element identifies a hierarchy of roads based upon their intended function and projected travel levels. The City's surface transportation system of streets and highways is based on a functional classification system providing four levels of service: major arterials, arterials, collectors, and local roads. The hierarchy of roadways is listed and briefly described below in Table 3-1 -Roadway Classifications.

Major Arterial roadways are typically designed with four through lanes, two transition/right-turn lanes and are divided by a raised median providing left-turn lanes. Major Arterial roadways are intended to

provide a high capacity in selected high volume corridors. Major arterial roadways are designed with required right-of-way, as described in the City of Reedley, Standard Plans and Specifications.

Table 3-1-Roadway Classifications

Facility Type	Functional Emphasis
Freeway/Highway	Mobility with no direct land access and access limited to interchanges.
Expressway	Mobility with more frequent access to “arterial” but no direct land access.
Arterial	Mobility with access to “collectors”, some “local” streets and major traffic generators.
Collector	Connects “local” streets to “arterials”, also provides access to adjacent land uses; balances mobility and access. May be “major” or “minor” collector streets.
Local	Access to adjacent land uses only; no mobility function.
Alley	Access to adjacent land use only, no mobility function.

Arterial roadways are typically designed with four through lanes and two shoulder/transition lanes and can be divided or undivided by a median. Arterial roadways provide connection to collector streets and access to major traffic generators. Arterial roadways are designed with required right-of-way, as described in the City of Reedley, Standard Plans and Specifications.

Collector roadways are typically designed with four through lanes and two parking/transition lanes and provide connection between arterial streets to local streets. Collector streets can provide some limited access to private properties. Collector roadways are designed with required right-of-way as described in the City of Reedley, Standard Plans and Specifications.

Local streets are typically designed for either industrial or residential carrying capacity. Local streets are intended exclusively to provide direct access to properties and designed to discourage through traffic between major streets. Typically designed for either industrial or residential carrying capacity, these street cross-sections can be found in the City of Reedley, Standard Plans and Specifications. However, local streets are typically not planned by the General Plan 2030 Update, Land Use and/or Circulation Elements, but existing local streets may be shown on exhibits for informational purposes.

The City has also developed surface transportation standards for alleys, frontage roads, secondary and emergency/maintenance access road standards. These standards can be found in the City of Reedley, Standard Plans and Specifications.

Level of Service

“Level of Service” (LOS) is a description of the ability of a street segment or intersection to accommodate levels of traffic demand. LOS is a qualitative measure of traffic operating conditions, whereby a letter grade “A” through “F” is assigned to an intersection or roadway segment representing progressively worsening traffic conditions (See Table 3-2 - Level of Service Description). LOS A, typically represents unrestricted free flow of traffic and excellent comfort for motorists, while LOS F, which represents highly congested forced flow conditions where traffic exceeds the capacities of streets. The adopted LOS in the General Plan 2030, Circulation Element is LOS C, was adopted.

Table 3-2- Level of Service Description

LOS	Conditions	Description	Intersections		
			Signalized	Unsignalized	All-Way Stop
A	Free Flow	Very slight delay. Progression is very favorable, with turning movements easily made.	≤10.0	≤10.0	≤10.0
B	Stable Operation	Good progression and/or short cycle lengths. Vehicle platooned are formed. Many drivers begin to feel somewhat restricted within groups of vehicles.	>10 and ≤20.0	>10 and ≤15.0	>10 and ≤15.0
C	Stable Operation	Higher delays resulting from fair progression and/or longer cycle lengths. Back-ups may develop behind turning vehicles. The number of vehicles stopping is significant and drivers feel somewhat restricted.	>20 and ≤35.0	>15 and ≤25.0	>15 and ≤25.0
D	Approaching Unstable	The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high volume-to-capacity ratios.	>35 and ≤55.0	>25 and ≤35.0	>25 and ≤35.0
E	Unstable Operations	Generally considered to be unacceptable to most drivers. Jammed conditions. Back-ups from other locations restrict or prevent movement. May also occur at high volume-to-capacity ratios.	>55 and ≤80.0	>35 and ≤50.0	>35 and ≤50.0
F	Forced Flow	Generally considered to be unacceptable to most drivers. Often occurs with over saturation. Jammed conditions. May also occur at high volume-to-capacity ratios. There are many individual cycle failures. Poor progression and long cycle lengths.	>80.0	>50.0	>50.0

Sources: Highway Capacity Manual 2000

The City will require Traffic Impact Studies for new development projects which have a significant impact based upon the number of vehicle trips generated by the project, location of the project relative to the existing circulation system, and actual or assumed level-of-service of surrounding streets or intersection. The General Plan policy is stated below:

CIR 3.2.28 Development resulting in any of the following shall be required, as part of the special permit approval process, to have a licensed engineer complete a traffic impacts study. The scope of that study shall be determined by the City Engineer and paid for by the developer.

- (a) 500 vehicle trips per day; or
- (b) 250 a.m. or p.m. peak hour trips; or
- (c) 25 Percent increase to existing traffic conditions from the development project.

The proposed project exceeded these thresholds. Therefore, pursuant to GPU Policy CIR 3.2.28, Traffic Impact Study was prepared under the direction of the City Engineer. VRPA Technologies, Inc. prepared the Master Planned 19-Acre Annexation including UHC Health Center Traffic Impact Study, dated March 2018 (Attachment 5). After consultation with the traffic consultant, the City Engineer shall have the authority, based upon his/her professional judgment, to apply, modify and incorporate mitigation measures to ensure the surface transportation systems operates at an acceptable LOS, as required by the Reedley General Plan Update 2030. The City's General Plan Goal CIR 3.2B: "Maintain a level of service (LOS) of "C" or better, as the established threshold of significance. An executive summary of the study is provided below:

Results of the LOS intersection analysis along the street and highway system in the project area from Existing through the Cumulative Year 2040 Plus Project scenario are reflected in Table E-1. Considering the significance criteria provided in Section 1.4, results of the analysis show that the Project will result in a direct project-specific impact at one (1) of the seven (7) study intersections (Zumwalt Avenue at Manning Avenue) when comparing the Existing and Existing Plus Project scenarios. It should be noted that the direct project-specific impact is related to full development of the site, or Phase 2 development. Phase 1 of the Project does not generate enough trips to directly impact the Zumwalt Avenue at Manning Avenue intersection.

Results of the analysis also show that the Project will result in a direct project-specific impact at four (4) of the seven (7) study intersections (Buttonwillow Avenue at Manning Avenue, Zumwalt Avenue at Manning Avenue, Buttonwillow Avenue at Dinuba Avenue, and Buttonwillow Avenue at Project Driveway) when comparing the Cumulative Year 2040 Without Project and Cumulative Year 2040 Plus Project scenarios.

Results of the LOS segment analysis along the street and highway system in the project area from Existing through the Cumulative Year 2040 Plus Project scenario are reflected in Table E-2.

Considering the significance criteria provided in Section 1.4, results of the analysis show that the Project will result in a direct project-specific impact at two (2) of the four (4) study roadway segments (Buttonwillow Avenue between Manning Avenue and Dinuba Avenue and Manning Avenue between Buttonwillow Avenue and Zumwalt Avenue) when comparing the Cumulative Year 2040 Without Project and Cumulative Year 2040 Plus Project scenarios.

Described below are potential improvements at study area intersections and segments for various scenarios that would, in most cases, result in acceptable levels of service. In order to mitigate the Project's impacts, the Project may be required to build improvements that are identified under the 'Existing Plus Project' and 'Near-Term Opening Year 2018 Plus Project' conditions to improve identified LOS deficiencies. In addition, the proposed Project will be required to contribute a fair-share towards the costs of improvements that are identified for the Cumulative Year 2040 scenarios.

Existing Plus Project Mitigation Measures

INTERSECTIONS

MM TR-1. Zumwalt Avenue at Manning Avenue

Recommended improvements to achieve acceptable levels of service:

- Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)

The intersection is forecasted to operate at acceptable LOS 'C' in the AM peak hour and unacceptable LOS 'D' in the PM peak hour under the Existing Plus Project scenario considering the improvements recommended above. This intersection does not meet the peak hour traffic signal warrant because the minor approach does not carry enough traffic to justify signalization. A traffic signal would alleviate the level of service deficiency anticipated in the PM peak hour.

It should be noted that the intersection operates at LOS 'D' in the AM and PM peak hour under Existing conditions. The improvements identified above for the Existing Plus Project scenario will reduce the PM peak hour delay experienced in the northbound approach to 31.8 seconds, which is within 5.0 seconds of the delay reported for Existing conditions. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-1. The improvement identified above is related to full development of the site, or Phase 2 development. Phase 1 of the Project does not generate enough trips to directly impact the Zumwalt Avenue at Manning Avenue intersection under Existing Plus Project Conditions.

Cumulative Year 2040 Plus Project Mitigation Measures

INTERSECTIONS

MM TR-2. Buttonwillow Avenue at Manning Avenue

Recommended improvements to achieve acceptable levels of service:

- Widen the westbound approach to 1 left turn lane, 2 through lanes, and 1 right turn lane (adding 1 right turn lane)

The intersection is forecasted to operate at acceptable LOS 'C' in the AM peak hour and unacceptable LOS 'D' in the PM peak hour under the Cumulative Year 2040 Plus Project scenario considering the improvements recommended above. It should be noted that the intersection operates at LOS 'D' in the PM peak hour under Cumulative Year 2040 Without Project conditions. The improvements identified above for the Cumulative Year 2040 Plus Project scenario will reduce the PM peak hour average delay to 46.8 seconds, which is within 5.0 seconds of the delay reported for the Cumulative Year 2040 Without Project scenario. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-2.

MM TR-3. Zumwalt Avenue at Manning Avenue

Recommended improvements to achieve acceptable levels of service:

- Install Traffic Signal
- Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)
- Widen the westbound approach to 1 left turn lane and 1 through lane (adding 1 left turn lane)

The intersection is forecasted to operate at acceptable LOS 'C' in the AM and PM peak hour under the Cumulative Year 2040 Plus Project scenario considering the improvements recommended above. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-3.

MM TR-4. Buttonwillow Avenue at Dinuba Avenue

Recommended improvements to achieve acceptable levels of service:

- Widen the southbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)
- Widen the eastbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)

- Widen the westbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)

The intersection is forecasted to operate at acceptable LOS 'B' in the AM peak hour and acceptable LOS 'C' in the PM peak hour under the Cumulative Year 2040 Plus Project scenario considering the improvements recommended above. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-4.

It should be noted that Dinuba Avenue between Frankwood Avenue and the eastern sphere of influence is planned to be widened from 2 to 4 lanes. Buttonwillow Avenue between South Avenue and Floral Avenue is also planned to be widened from 2 to 4 lanes. These capacity increasing projects are listed in the Fresno COG 2014 RTP Financially Constrained Project List (PROJECT ID FRE500700 and FRE500764).

MM TR-5. Buttonwillow Avenue at Project Driveway
Recommended improvements to achieve acceptable levels of service:

- Limit access to right-in/right out

The intersection is forecasted to operate at acceptable levels of service in the AM and PM peak hour under the Cumulative Year 2040 Plus Project considering the improvements recommended above. This intersection does not meet the peak hour traffic signal warrant because the minor approach (Project Driveway) does not carry enough traffic to justify signalization. A traffic signal would alleviate the level of service deficiency anticipated in the PM peak hour. Limiting access at this driveway to right-in/right out would alleviate the level of service deficiency. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-5.

ROADWAY SEGMENTS

MM TR-6. Buttonwillow Avenue between Manning Avenue and Dinuba Avenue
Recommended improvements to achieve acceptable levels of service:

- Widen the northbound travel lane from 1 to 2 lanes (adding 1 travel lane)
- Widen the southbound travel lane from 1 to 2 lanes (adding 1 travel lane)

The northbound and southbound travel lane is forecasted to operate at acceptable LOS 'C' in the AM and PM peak hour under the Cumulative Year 2040 Plus Project scenario considering the improvements recommended above. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-6.

It should be noted that Buttonwillow Avenue between South Avenue Floral Avenue is planned to be widened from 2 to 4 lanes. This capacity increasing project is listed in the Fresno COG 2014 RTP Financially Constrained Project List (PROJECT ID FRE500764).

MM TR-7. Manning Avenue between Buttonwillow Avenue and Zumwalt Avenue
Recommended improvements to achieve acceptable levels of service:

- Widen the eastbound travel lane from 1 to 2 lanes (adding 1 travel lane)
- Widen the westbound travel lane from 1 to 2 lanes (adding 1 travel lane)

The eastbound and westbound travel lane is forecasted to operate at acceptable LOS 'C' in the AM and PM peak hour under the Cumulative Year 2040 Plus Project scenario considering the improvements recommended above. Therefore, the Project's impact is considered less than significant with incorporation of MM TR-7. Phase 1 of the Project will be developed first and will only be responsible for widening its Project (Phase 1) frontage.

It should be noted that Manning Avenue between Buttonwillow Avenue and Zumwalt Avenue is planned to be widened from 2 to 4 lanes. This capacity increasing project is listed in the Fresno COG 2014 RTP Financially Constrained Project List (PROJECT ID FRE500761). The widening of Manning Avenue is also listed as a TIER 2 Project on the Final 2006 Measure "C" Extension Expenditure Plan (PROJECT ID GG).

Equitable Fair-Share Responsibility

The Project will be required to build improvements that are identified for the Existing Plus Project scenario to improve identified LOS deficiencies. Improvements identified for the Existing Plus Project scenario include the addition of an eastbound right turn lane at the Zumwalt Avenue at Manning Avenue intersection. It should be noted that this improvement is related to the full development of the Project (Phase 1 and 2).

MM TR-1. Zumwalt Avenue at Manning Avenue

Existing Plus Project scenario:

- Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)

The proposed Project will be required to contribute a fair-share towards the costs of improvements that are identified for the Cumulative Year 2040 scenario. The intent of determining the equitable responsibility for the improvements identified above for the Cumulative Year 2040 scenario, is to provide a starting point for early discussions between the applicant and the City to address traffic mitigation equitability and to calculate the equitable share for mitigating traffic impacts. As noted above, roadway improvements identified for the Buttonwillow Avenue and Manning Avenue roadway segments are included in the project list for the City of Reedley's Development Impact Fees. The Project's share of mitigation for these improvements will be satisfied by the payment of the City's Development Impact Fees, which has been previously been determined to be \$7,214.50 per 1,000 square feet for commercial land use types.

The formulas used to calculate the equitable share responsibility to City of Reedley/Fresno County facilities is as follows:

$$\text{Equitable Share} = (\text{Project Trips}) / (\text{Cumulative Year 2040 Plus Project Traffic} - \text{Existing Traffic})$$

Table E-5 shows the Project's equitable fair share responsibility for Phase 1 and Phase 2 on a percentage basis for improvements to City of Reedley and Fresno County facilities as described above. The equitable fair share responsibility shown in Table E-5 is the result of LOS enhancements related to capacity. Table E-6 shows recommended improvements as a result of the Project and which phase of the Project triggers the need for the improvements.

**Table E-5
Cumulative Year 2040 Equitable Fair-Share Responsibility**

INTERSECTION	PEAK HOUR	EXISTING	PHASE 1 PROJECT TRIPS	PHASE 2 PROJECT TRIPS	CUMULATIVE YEAR 2040 PLUS PROJECT (PHASE 1&2)	FAIR SHARE PERCENTAGE PHASE 1	FAIR SHARE PERCENTAGE PHASE 2
Buttonwillow Avenue / Manning Avenue	PM	1,930	59	402	3,504	3.7%	25.5%
Zumwalt Avenue / Manning Avenue	PM	903	6	52	1,483	1.0%	9.0%
Buttonwillow Avenue / Dinuba Avenue	PM	1,702	19	125	2,943	1.5%	10.1%
Buttonwillow Avenue / Project Driveway	PM	--	24	124	--	16.2%	83.8%
ROADWAY SEGMENTS							
Buttonwillow Avenue							
Manning Avenue to Dinuba Avenue	NB PM	483	6	72	848	1.6%	19.7%
	SB PM	510	15	78	897	3.9%	20.2%
Manning Avenue¹							
Buttonwillow Avenue to Project's Eastern Boundary	EB PM	477	9	121	882	2.2%	29.9%
	WB PM	459	33	157	913	7.3%	34.6%
Project's Eastern Boundary to Zumwalt Avenue	EB PM	459	5	27	882	1.2%	6.4%
	WB PM	429	1	25	913	0.2%	5.2%

¹ - The capacity analysis of Manning Avenue indicated a LOS deficiency between Buttonwillow Avenue and Zumwalt Avenue. To accurately show the Project's fair-share to the Manning Avenue roadway, the segment was divided as shown above.

Source: VRPA Technologies, Inc. TIS page 50

**Table E-6
Recommended Improvements**

IMPROVEMENT	PHASE 1 PROJECT DEVELOPMENT ¹	PHASE 1 & 2 PROJECT DEVELOPMENT
<u>MM TR-1 Zumwalt Avenue at Manning Avenue</u> - Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)		★
<u>MM TR-2 Buttonwillow Avenue at Manning Avenue</u> - Widen the westbound approach to 1 left turn lane, 2 through lanes, and 1 right turn lane (adding 1 right turn lane)	★	
<u>MM TR-3 Zumwalt Avenue at Manning Avenue</u> - Install Traffic Signal - Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane) - Widen the westbound approach to 1 left turn lane and 1 through lane (adding 1 left turn lane)		★
<u>MM TR-4 Buttonwillow Avenue at Dinuba Avenue</u> - Widen the southbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane) - Widen the eastbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane) - Widen the westbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)		★
<u>MM TR-5 Buttonwillow Avenue at Project Driveway</u> - Limit access to right-in/right out	★	
<u>MM TR-6 Buttonwillow Avenue between Manning Avenue and Dinuba Avenue</u> - Widen the northbound travel lane from 1 to 2 lanes (adding 1 travel lane) - Widen the southbound travel lane from 1 to 2 lanes (adding 1 travel lane)		★
<u>MM TR-7 Manning Avenue between Buttonwillow Avenue and Zumwalt Avenue</u> - Widen the eastbound travel lane from 1 to 2 lanes (adding 1 travel lane) - Widen the westbound travel lane from 1 to 2 lanes (adding 1 travel lane)		★

¹ -Table 4-4 shows the Project's equitable fair share responsibility for Phase 1 on a percentage basis for improvements to City of Reedley and Fresno County facilities as described above.

★ Signifies when improvement is warranted

Source: VRPA Technologies, Inc. TIS page 51

Project Specific Mitigation Measures

MM TR-1. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 2:
Zumwalt Avenue at Manning Avenue

- Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)

MM TR-2. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 1:
:
Buttonwillow Avenue at Manning Avenue

- Widen the westbound approach to 1 left turn lane, 2 through lanes, and 1 right turn lane (adding 1 right turn lane)

MM TR-3. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 2:
:
Zumwalt Avenue at Manning Avenue

- Install Traffic Signal
- Widen the eastbound approach to 1 through lane and 1 right turn lane (adding 1 right turn lane)
- Widen the westbound approach to 1 left turn lane and 1 through lane (adding 1 left turn lane)

MM TR-4. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 2:
:
Buttonwillow Avenue at Dinuba Avenue

- Widen the southbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)
- Widen the eastbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)
- Widen the westbound approach from one (1) entry lane to two (2) entry lanes at the roundabout (adding 1 entry lane)

MM TR-5. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 1:
:
Buttonwillow Avenue at Project Driveway

- Limit access to right-in/right out

MM TR-6. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 2:
:
Buttonwillow Avenue between Manning Avenue and Dinuba Avenue

- Widen the northbound travel lane from 1 to 2 lanes (adding 1 travel lane)
- Widen the southbound travel lane from 1 to 2 lanes (adding 1 travel lane)

MM TR-7. Project specific mitigation shall include the construction of the following improvements by the Project developer during Phase 2:
:

Manning Avenue between Buttonwillow Avenue and Zumwalt Avenue

- Widen the eastbound travel lane from 1 to 2 lanes (adding 1 travel lane)
- Widen the westbound travel lane from 1 to 2 lanes (adding 1 travel lane)

MM TR-8. Project specific mitigation for the future impacts to “off-site” improvements shall include the proposed Project developer contributing their fair-share towards the costs of improvements that are identified for the Cumulative Year 2040 scenario, as shown in Table E-5.

**Table E-5
Cumulative Year 2040 Equitable Fair-Share Responsibility**

INTERSECTION	PEAK HOUR	EXISTING	PHASE 1 PROJECT TRIPS	PHASE 2 PROJECT TRIPS	CUMULATIVE YEAR 2040 PLUS PROJECT (PHASE 1&2)	FAIR SHARE PERCENTAGE PHASE 1	FAIR SHARE PERCENTAGE PHASE 2
Buttonwillow Avenue / Manning Avenue	PM	1,930	59	402	3,504	3.7%	25.5%
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Buttonwillow Avenue / Project Driveway	PM	--	24	124	--	16.2%	83.8%
ROADWAY SEGMENTS							
Buttonwillow Avenue							
Manning Avenue to Dinuba Avenue	NB PM	483	6	72	848	1.6%	19.7%
	SB PM	510	15	78	897	3.9%	20.2%
Manning Avenue¹							
Buttonwillow Avenue to Project's Eastern Boundary	EB PM	477	9	121	882	2.2%	29.9%
	WB PM	459	33	157	913	7.3%	34.6%
Project's Eastern Boundary to Zumwalt Avenue	EB PM	459	5	27	882	1.2%	6.4%
	WB PM	429	1	25	913	0.2%	5.2%

¹ - The capacity analysis of Manning Avenue indicated a LOS deficiency between Buttonwillow Avenue and Zumwalt Avenue. To accurately show the Project's fair-share to the Manning Avenue roadway, the segment was divided as shown above.

Source: VRPA Technologies, Inc. TIS page 50

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES -- Would the project:				
a) cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			X	

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			X	

Pursuant to Public Resources Code section 21080.3.1, a Formal Notification of Determination that this project is Complete and a Notice of Consultation Opportunity was delivered on September 11, 2017. To the date of the preparation of this initial study, there was no request for consultation received by the City of Reedley. The project site is not listed or eligible for listing in the California Register of Historical Resources or in a local register of historic resources. After providing the opportunity for consultation and not receiving a request, the lead agency has determined that the project site is not a significant resource to a California Native American tribe. The project is vacant land and agricultural land surrounded on two sides by existing urban uses. Therefore, the project would not cause a substantial adverse change in the significance of a tribal cultural resource.

Therefore, no project-specific mitigation for tribal cultural resources is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS -- Would the project:				

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
e) 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?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	

The City of Reedley, General Plan Update 2030 (approved February 2014), Urban Water Management Plan (approved January 2017) and Integrated Master Plan for Potable Water, Sanitary Sewer, and Storm Drainage Systems (approved May 2014) demonstrate the City has an adequate water supply to support urban growth for future decades, including the small increment of growth that may be created by the this proposed development project.

The proposed development project is required to connect to the water, wastewater, and storm drainage systems. The small increment of additional service demand would be *de minimis* and well within the available capacities of each of the public utility systems.

Therefore, no project-specific mitigation for utilities and service system impacts is required.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?			X	
b) Does the project have impacts that 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)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

In summary, given the preceding analysis, conditions of approval applied to the project and Program Environmental Impact Report (SCH No. 2010031106), Mitigation Monitoring Checklist, being incorporated into Annexation Application No. 2017-2, Pre-Zone Application No. 2017-2, and Site Plan Review Application No 2017-3, it may be concluded that the proposed development project:

- does not have environmental impacts which will cause substantial adverse effects on human beings, either directly nor indirectly.
- does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish/wildlife or native plant species (or cause their population to drop below self-sustaining levels), does not threaten to eliminate a native plant or animal community, and does not threaten or restrict the range of a rare or endangered plant or animal.
- does not eliminate important examples of elements of California history or prehistory.

- does not have impacts which would be cumulatively considerable even though individually limited.

Therefore, there are no mandatory findings of significance and the preparation of a Mitigated Negative Declaration is warranted for this project.

Attachments:

1. Aerial photo of subject property
 2. Annexation Application No. 2017-2
 3. Pre-Zone Application No. 2017-2
 4. Diagram of the project proposed by Site Plan Review Application No. 2017-3
 5. Master Planned 19-Acre Annexation Including UHC Health Center – Air Quality & Greenhouse Gas Impact Assessment – prepared by VRPA Technologies, Inc. – dated March 2018
 6. Master Planned 19-Acre Annexation Including UHC Health Center – Traffic Impact Study – prepared by VRPA Technologies, Inc. – dated March 2018
- Exhibit A: City of Reedley, General Plan Land Use Map (As adopted by City Council Resolution No. 2014-18)
- Exhibit B: Project Specific Mitigation Monitoring Checklist, dated April 26, 2018
- Exhibit C: Mitigation Monitoring Checklist for Final Environmental Impact Report (SCH No. 2010031106) & Reedley General Plan Update 2030, dated February 18, 2014.

Documents Referenced:

The Initial Study is referenced by the documents listed below. These documents are available for public review at the City of Reedley Community Development Department, 1733 Ninth Street, Reedley, California.

City of Reedley General Plan 2030, Policy Document and Program EIR

City of Reedley Zoning Ordinance

Important Farmland 2014 Map, State Department of Conservation

Google Earth Pro Historical Imagery

U.S. Census Bureau 2010 Census

Note: Authority cited: Sections 21083 and 21083.05, 21083.09 Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2, 21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.