La Paloma Winery
Initial Study/Mitigated Negative Declaration
City of Clovis, Fresno County, California

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SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the La Paloma Winery project in Clovis, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Clovis is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The City has discretionary authority over the project. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Section 2 includes an environmental checklist giving an overview of the potential impacts that may result from project implementation. Section 2 elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

It was determined that the preparation of an IS/MND would ensure compliance with CEQA on all environmental issues associated with the project. An MND is proposed for this project because it has been determined that the project, with mitigation measures implemented, would not have a significant effect on the environment.

1.2 - Project Location

The 16.56-acre project site is located northeast of East Dakota Avenue and North Clovis Avenue in the City of Clovis, in Fresno County California (Exhibit 1). The project site consists of two Fresno County assessor's parcel numbers (APNs 495-220-06T and 495-220-12T), located at 3495 North Clovis Avenue in the City of Clovis, California (Exhibit 2). The project is located on the Clovis 7.5-minute United States Geological Survey, topographic map, northwest quarter of Section 21, Township 13 South, Range 21 East (Latitude 36°47'20.78"N; 119°41'55.82"W) (Exhibit 3).

1.3 - Environmental Setting

The project site is situated on relatively flat land and is surrounded by vacant and residential development in the City of Clovis.

The site was most recently operated as the La Paloma Winery; prior uses include the Swiss Colony Winery. Nine buildings and associated out structures and remnants of these former uses remain intact.

The City of Clovis Parks and Recreation Center operates out of a former winery building located at the southwest corner of the site (Building 8). The remaining buildings have been abandoned since

the 1970s and have been sealed to prevent trespassing, although evidence of human intrusion is evident in the form of graffiti and refuse.

Exhibit 2 shows the locations of the nine existing buildings and out structures.

The following is a summary of the existing structures that are located on the project site.

Table 1: Existing Onsite Structures

Building Number	Square Feet	Description
1	8,800	The building has precast concrete exterior walls and a flat roof. The building is set upon a concrete slab-on-grade foundation and reportedly was used to house a former on-site distillery and administrative offices.
2	40,000	The building has precast concrete exterior walls and a flat roof. The building is set upon a concrete slab-on-grade foundation. The interior of this building has been gutted and only the exterior walls and concrete floor remain. In order to retain structural integrity, metal poles were placed symmetrically along the interior of the walls. The concrete floor is cracked and filled with weeds, and different bands of color and texture were visible throughout the concrete floor. Reportedly, this was the former location for the storage of numerous wine barrels and vats.
3	1,200	Building 3 is a four-story tower with cast-in-place concrete exterior walls and large vertical window openings. This building is set upon a concrete slab-on-grade foundation. Round and square concrete foundations and several troughs were observed on the ground floor. Reportedly, the concrete foundations were used to support large, aboveground storage tanks (ASTs) and piping. An exterior metal ladder system allows secondary access to the upper floors.
4	12,600	Building 4 is a two-story industrial-style building with a flat roof. The building is set upon a concrete slab-on-grade foundation and was used for storage purposes. It appears this building was constructed to integrate the Building 3 tower into its southwest corner. The concrete walls of the building contain numerous metal sash windows. The original second story wooden floor appears to be intact. Openings between Building 4 and Building 3 appear to have been filled in with brick and concrete block.
5	88,000	Building 5 is a multi-story building with a flat roof built upon a concrete slab-on-grade foundation. The building is occupied by numerous large concrete wine vats that are open on the top. Some of the vats were observed to be integrated into the exterior walls of the building.
6	32,200	Building 6 is a two-story building with a flat roof and exterior walls made up of concrete and corrugated sheet metal. The building is built on a concrete slab-on-grade foundation. The interior of this on-site building is filled with 20-foot-tall concrete vats accessed by a series of stairs and catwalks. A small vacant workshop area was observed within the southeast corner. A small metal utility shed and appurtenances is adjacent to the east of Building 6.

Table 1 (cont.): Existing Onsite Structures

Building Number	Square Feet	Description
7	32,200	Building 7 is nearly identical to Building 6. It is a two-story building with a flat roof and exterior walls made up of concrete and corrugated sheet metal. The building is built on a concrete slab-on-grade foundation. The interior of this on-site building is filled with 20-foot-tall concrete vats accessed by a series of stairs and catwalks. Some of the vats within this building have been turned into storage units.
8	30,000	Building 8 is a single-story building with concrete walls and a flat roof built on a concrete slab-on-grade foundation. This building has symmetrically spaced openings along the exterior walls that suggest that they were designed to accommodate truck loading and unloading. This building is currently occupied by the City of Clovis Recreation Center, which consists of two basketball courts, a roller hockey rink, and offices.
9	600	Building 9 is a small approximately 600-square-foot building with stucco exterior walls and a tile roof set upon a concrete slab-on-grade foundation. Reportedly, this building was formerly used as a guard station and is currently vacant.
Source: City of Clovis Constraints Analysis Report, March 5, 2015		

The area to the east of Building 5 and 6 contains remnants of the former operations. The northern half is paved with asphaltic-concrete (AC) and contains three long, concrete, trough-like structures. The southern half is occupied by a large, open, rectangular concrete aboveground storage tank set upon a large concrete block foundation. The tank is empty and divided into two compartments.

A 10,000-gallon, steel aboveground storage tank (AST) is located between Buildings 5 and 6. The tank formerly contained water that was to be used in the event of a fire at the winery.

The City of Clovis water well No. 18 and pad-mounted electrical transformer are located in the northern portion of the site. The water well provides the site with water.

The southeastern portion of the site (approximately 2.4 acres) is an open field that is regularly disked.

A row of trees consisting of Canary Island pine (*Pinus canariensis*) and Washington fan palm (*Washingtonia robusta*) line North Clovis Avenue and the Fresno-Clovis Rail Trail.

Exhibit 4a nd Exhibit 4b provide views of the project site. Exhibit 5a and Exhibit 5b provide views of the project buildings and palm trees.

1.4 - Surrounding Land Uses Designations

Surrounding lands consist of residential development to the north and west and an approximately 20-acre disked field to the east and south. Table 2 provides a summary of the existing land uses and their General Plan Land Use and Zoning designations.

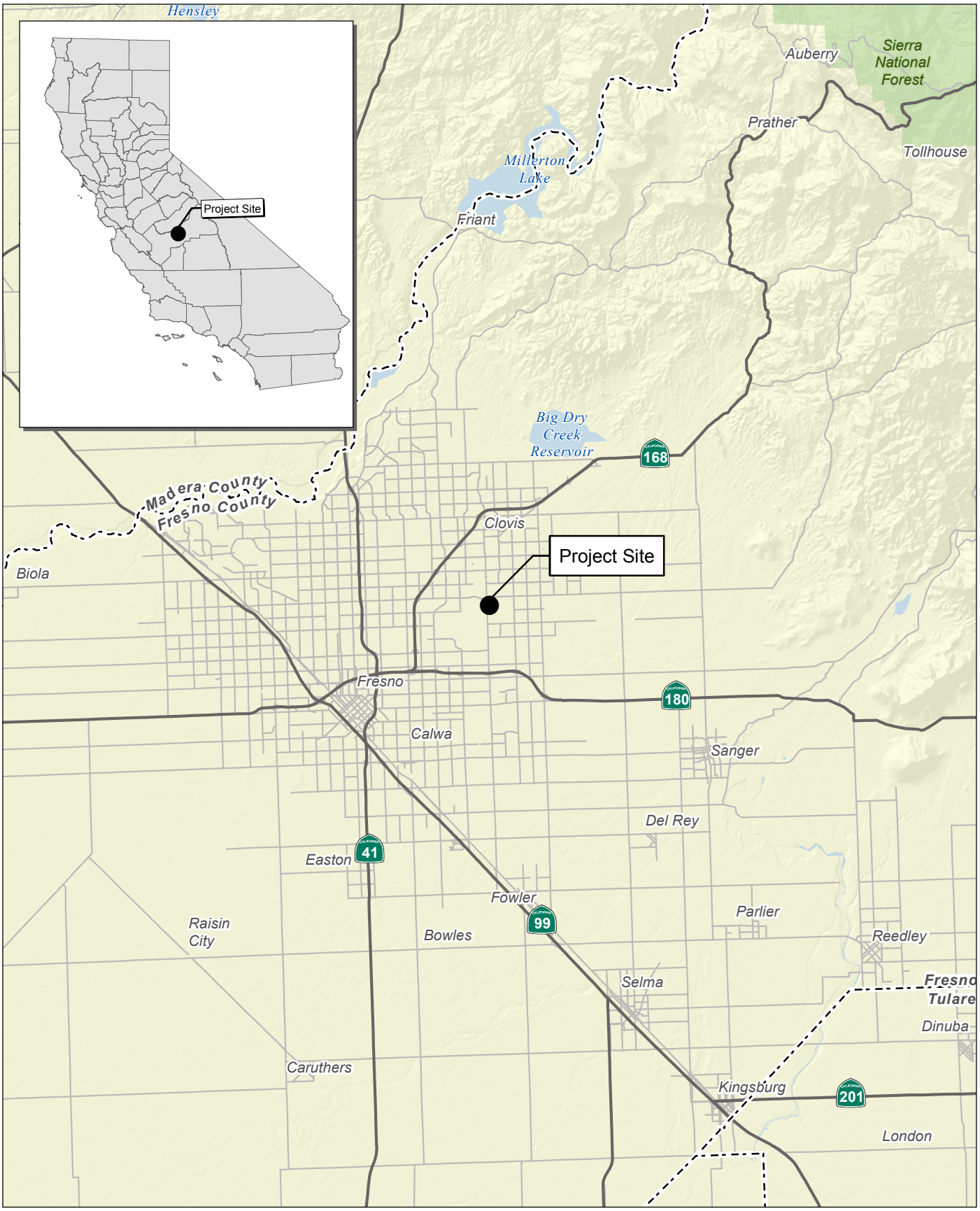
Table 2: Existing Land Use, General Plan and Zoning Designations

Area	Existing Land Use	Adjacent Street	Jurisdiction	General Plan Designation	Zoning Designation
Project Site	Former winery and Recreational Center	Clovis Avenue	City of Clovis	Mixed Use Village (MU-V)	• Community Commercial (C-2) • Commercial - Light Manufacturing (C-M) • Light Manufacturing (M-1) • General Industrial (M-2)
North	Residential	Portion of East Sussex Way	County of Fresno	Single Family Residential (R1)	R1 - Single Family Residential
East	Residential, Vacant Land	None	City of Clovis	• Residential - Medium Density Residential (4.1-7.0 DU/AC) • Vacant Land - Mixed Use Village (MU-V)	• Residential - Single Family Residential (R-1) • Vacant Land - Residential Land (R-A)
South	Residential, Vacant Land	East Dakota Avenue	City of Clovis	Residential - Medium Density Residential (4.1-7.0 DU/AC)	Residential - Single Family Residential (R-1)
West	Fresno-Clovis Rail Trail	Clovis Avenue	City of Clovis	Existing Trail	Existing Trail
West of Clovis Avenue	Residential	Clovis Avenue	County of Fresno	Single Family Residential (R1)	R1 - Single Family Residential
Sources: County of Fresno, Web Mapping Application, 2015. City of Clovis General Plan Land Use Designations, Revised June 26, 2015. City of Clovis Zone Map, Revised July 28, 2014.					

1.5 - Project Description

The project involves the demolition of several buildings associated with the former winery use. The project site has become an attractive nuisance and many of the buildings are crumbling and a potential safety hazard. The City wishes to clear these dangerous buildings and secure the site so that it is not a safety hazard.

The City of Clovis intends to demolish Buildings 2, 5, 6, 7, and 9. The distillery building (Building 1), Building 4, and the tower (Building 3), would be preserved for potential future re-use. Building 8, which serves as the City of Clovis Parks and Recreation Center, would also remain. Exhibit 2 shows the buildings proposed for demolition.



Source: Census 2000 Data, The CaSIL, FCS GIS 2013.

FirstCarbon® SOLUTIONS

5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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CITY OF CLOVIS • LA PALOMA WINERY
INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

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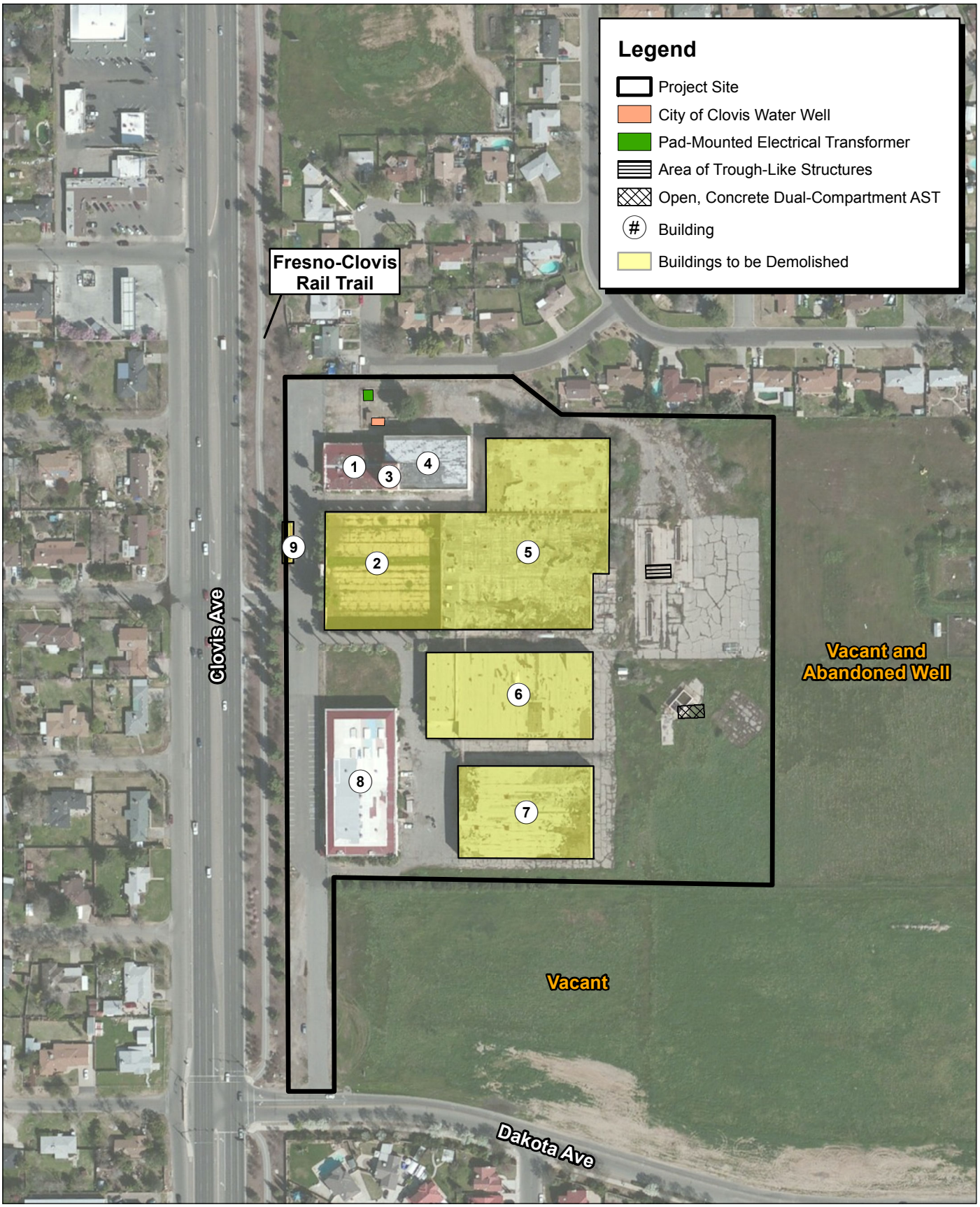

Source: ESRI Aerial Imagery, FCS GIS 2015.

FirstCarbon SOLUTIONS

250 125 0 250 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

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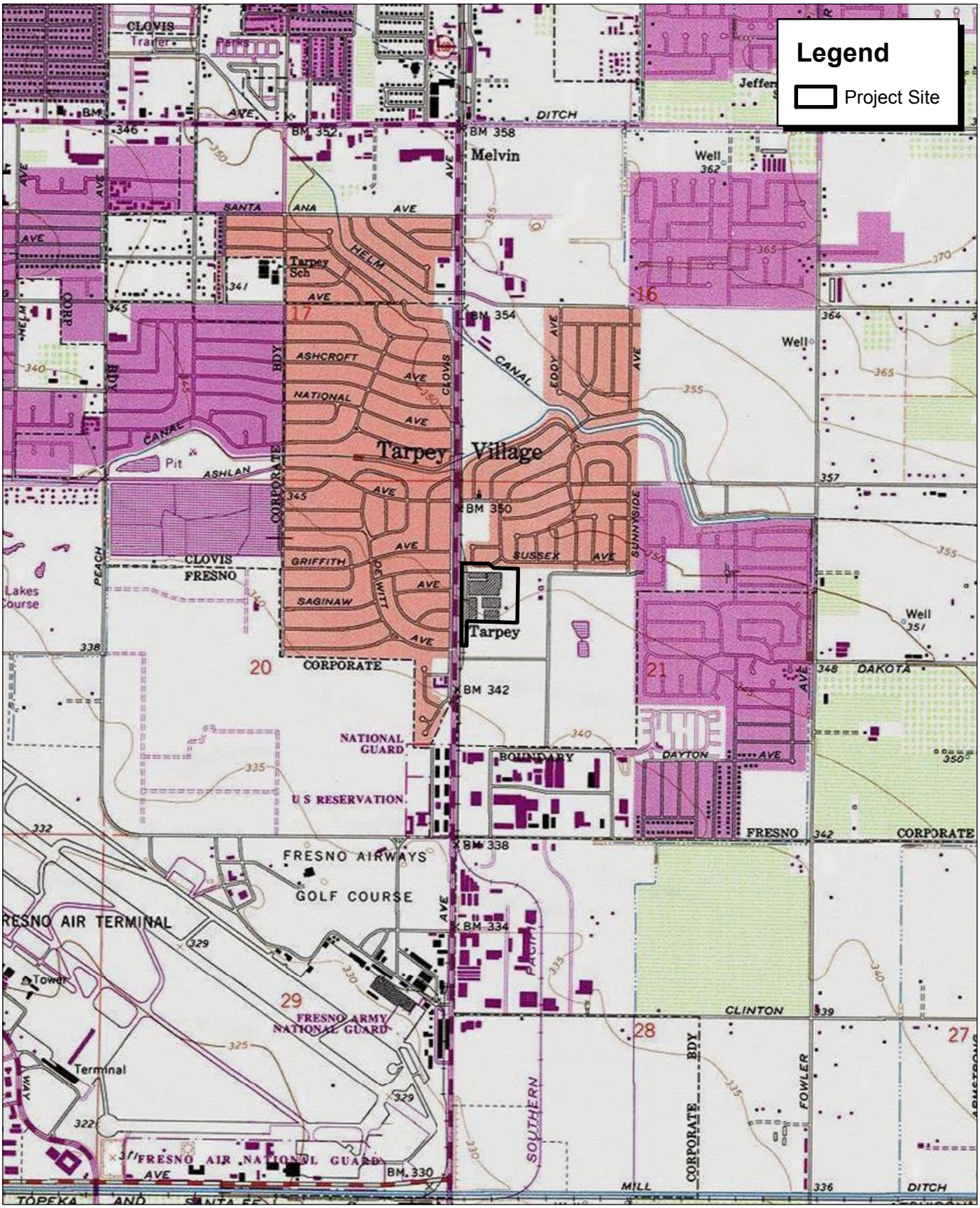

Source: USA Topo Maps USGS Clovis, CA 7.5' DRG.

FirstCarbon® SOLUTIONS

2,000 1,000 0 2,000 Feet

Exhibit 3
Local Vicinity Map
Topographic Base

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View of project site from residences near Clovis Avenue and Pontiac Avenue (looking east)

View of project site from residences west of Clovis Avenue (looking southeast)

View of project site from residences directly across Clovis Avenue (looking east)

View of project site from southwest corner of Dakota and Clovis Avenue (looking northeast)

Source: FirstCarbon Solutions, 2015.

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Exhibit 4A
Views of Project Site

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View of project site looking north from Dakota Avenue at southern project boundary

View looking northeast from Dakota Avenue at southern project boundary

View looking northwest from Dakota Avenue

View looking northwest of project site from Westcal II Park (Dakota Avenue and Phillip Avenue)

Source: FirstCarbon Solutions, 2015.

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Exhibit 4B
Views of Project Site (continued)

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View of Buildings 1, 3 and 4

View of Building 2 Interior

View of Build 2

View of Palm Strand and Building 2

Source: FirstCarbon Solutions, 2015.

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Exhibit 5A
Views of Project Buildings

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View of Buildings 5, 6, and 7

View of Buildings 7, 6, 5

View of Building 9

View of Building 8

Source: FirstCarbon Solutions, 2015.

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Exhibit 5B
Views of Project Buildings (continued)

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The City also intends to clear overgrown vegetation and remove debris that has accumulated on the project site. The City intends to keep the strand of palm trees adjacent to Building 2. Demolition and clean-up will begin in January 2016 and will be completed within 12 months.

There are no existing development plans for the re-use of the project site. In the future, if the City is presented with plans for re-use, the potential re-use of the project site would be subject to further environmental review.

1.6 - Intended Uses of this Document

This IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the project. The Draft IS/MND will be circulated for a minimum of 30 days, during which period comments concerning the analysis contained in the IS/MND should be sent to:

Steven E. White, City Engineer
City of Clovis
1033 Fifth Street
Clovis, CA 93612
Phone: 559.324.2844
Email: stevenw@cityofclovis.com

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected

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

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

Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: 10/6/15 Signed: _____

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. Aesthetics *Would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Setting

The project is located in the City of Clovis, which lies within Fresno County. Fresno County is located in a geographically diverse region with the peaks of the Sierra Nevada Mountains framing its eastern region, while its western portion includes the San Joaquin Valley floor. The City of Clovis is located near the center of Fresno County, bordered by the City of Fresno to the southwest and the Sierra Nevada foothills to the east.

The project site surrounded by urban development associated with the City of Clovis. The project is bordered by residential uses to the south and east, with additional residences located west of Clovis Avenue (the project's western border).

Environmental Evaluation

Would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than significant impact. A scenic vista is generally considered a view of an area that has remarkable scenery or resources that is indigenous to the area. The City of Clovis General Plan does not identify any scenic vistas within the project area. The project itself does not provide any visual resources that would be considered a scenic vista or part of a scenic vista, because it primarily consists of existing structures related to the former winery and other urban uses that are relatively common in other areas of Clovis and are not unique to the surrounding visual setting (see Exhibit 4a and Exhibit 4b). Additionally, the project would preserve the more architecturally significant structures and mature vegetation for potential future reuse. Exhibit 5a and 5b provide views of the project buildings and show the dilapidated nature of the buildings to be demolished. Neither the

project site nor any adjacent land uses contain features typically associated with scenic vistas (e.g., ridgelines, peaks, overlooks). Therefore, little opportunity exists for project activities to obscure views of scenic vistas. The project would result in less than significant impacts to scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?

No impact. The project site is not located on or near a state designated scenic highway. The scenic corridor portions of State Route 168 (SR-168) and SR-180, which are identified in the Caltrans Scenic Highway Mapping System as Eligible State Scenic Highways (DOT 2015), are located approximately 10 miles and 17 miles respectively from the project site. The project site is not visible from these routes, thus this condition precludes the potential to substantially damage scenic resources within a state scenic highway; therefore, no impact would occur.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant impact. The project site is visually obscured from south and west by mature landscaping that borders the fenceline and the Fresno-Clovis Rail Trail respectively (see Exhibit 4a). Residential uses to the north of the project site have a clear view of the site. Residential uses to the east have a clear view of the existing vacant land and the existing buildings in the distance.

Presently, the site contains several buildings related to the former winery use, along with a lot of overgrown vegetation and debris. Visually, the site has fallen into a state of decay and disrepair. The project would demolish many of the buildings on the project site due to their dilapidated nature and safety risk. The project would retain the more architecturally significant buildings (Building 1, Building 4, and Building 3), which the City intends to preserve for potential future re-use. In addition, the project would retain Building 8, which serves as the City of Clovis Parks and Recreation Center. The project would also maintain the mature growth of palm trees that exist on the project site. The project would clean up much of the overgrown vegetation and debris that has accumulated. Therefore, although some of the buildings would be removed, the project would retain the more significant buildings and would alleviate the state of disrepair that is the current visual characteristic. The impact would be less than significant.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than significant impact. The City currently maintains security lighting at the site. There are minimal sources of glare, as the existing buildings do not contain large glass walls or highly reflective glass. Some temporary lighting may be used during demolition for security purposes; however, the project would not add any permanent sources of lighting or glare. All temporary lighting would be hooded and/or directed downward away from Clovis Avenue and away from the residences to the north of the project site in compliance with the City of Clovis' Municipal Code. Therefore, project impacts would be less than significant.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Setting

The area encompassing and surrounding the project is identified by the Fresno County Important Farmland 2012 Map as Urban and Built-up Land. The project site is designated by the City of Clovis General Plan as Mixed Use Village (MU-V).

Environmental Evaluation

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997)

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

Would the project:

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

No impact. The project site is mapped as "Urban and Built-up Land" by the California Department of Conservation Farmland Mapping and Monitoring Program. Therefore, implementation of the project would not result in the conversion of Important Farmland ton non-agricultural use. No impacts would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. The project site is zoned Community Commercial (C-2), Commercial – Light Manufacturing (C-M), Light Manufacturing (M-1), and General Industrial (M-2) by the City of Clovis. These are urban designations; accordingly, no conflict would occur with an agricultural zoning.

There are no Williamson Act contracts on the project site; accordingly, no conflict would occur.

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))?

No impact. The project site is not zoned as forest land. This condition precludes the possibility of the project conflicting with existing forest land zoning or cause rezoning of forest land. No impact would occur.

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

No impact. The project site does not contain any active forest land or support trees that may be commercially harvested. No impacts would occur.

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

No impact. Surrounding land uses consist of urban development. Therefore, it is unlikely that the proposed activity would create the conversion of farmland to non-agricultural use or the conversion of forestland to non-forest use. Therefore, no impact would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. Air Quality *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.* *Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Environmental Setting

The project is located in the City of Clovis, within the San Joaquin Valley Air Basin (SJVAB). SJVAB lies within the central portion of the San Joaquin Valley, approximately 300 miles long, and is shaped like a bowl. It is open in the north and is surrounded by mountain ranges on all other sides. The Sierra Nevada Mountains are along the eastern boundary (8,000 to 14,000 feet in elevation), the Coast Ranges are along the western boundary (3,000 feet in elevation), and the Tehachapi Mountains are along the south boundary (6,000 to 8,000 feet in elevation). The project is located within the San Joaquin Valley Air Pollution Control District (SJVAPCD), which includes eight counties in the Central Valley: San Joaquin, Stanislaus, Merced, Madera, Fresno, Kings, Tulare, and the San Joaquin Valley Air Basin portion of Kern.

The basin is designated as nonattainment for state ozone, PM_{10}, and $PM_{2.5}$ standards and federal ozone and $PM_{2.5}$ standards. Therefore, the pollutants of concern for the project are ozone, $PM_{10,}$ and $PM_{2.5}$.

Ozone is not emitted directly into the air; rather, it is a regional pollutant formed by a photochemical reaction in the atmosphere. Ozone precursors, which include reactive organic gases (ROG) and oxides of nitrogen (NO_x), react in the atmosphere in the presence of sunlight to form ozone. Significant ozone formation generally requires an adequate amount of ozone precursors in the

atmosphere and several hours in a stable atmosphere with strong sunlight. The conditions for ozone formation are prevalent during the summer when thermal inversions are most likely to occur. PM levels tend to be highest during the winter months when the meteorological conditions favor the accumulation of localized pollutants. This occurs when relatively low inversion levels trap pollutants near the ground and concentrate the pollution.

The SJVAPCD has issued a Guide for Assessing Air Quality Impacts (GAMAQI). The SJVAPCD recommends the following thresholds be used to determine significant impacts:

- CO – 100 tons per year
- ROG – 10 tons per year
- NO_x – 10 tons per year
- SO_x – 27 tons per year
- PM_{10} – 15 tons per year
- $PM_{2.5}$ – 15 tons per year

Environmental Evaluation

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?

Less than significant impact. The CEQA Guidelines indicate that a significant impact would occur if the project would conflict with or obstruct implementation of the applicable air quality plan. The GAMAQI does not provide specific guidance on analyzing conformity with the Air Quality Plan (AQP). Therefore, this document proposes the following criteria for determining project consistency with the current AQPs:

1. Will the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs? This measure is determined by comparison to the regional and localized thresholds identified by the District for Regional and Local Air Pollutants.
2. Will the project conform to the assumptions in the AQPs?
3. Will the project comply with applicable control measures in the AQPs?

The use of the criteria listed above is a standard approach for CEQA analysis of projects in the District's jurisdiction, as well as within other air districts, for the following reasons:

- Significant contribution to existing or new exceedances of the air quality standards would be inconsistent with the goal of attaining the air quality standards.

- AQP emissions inventories and attainment modeling are based on growth assumptions for the area within the air district's jurisdiction.
- AQPs rely on a set of air district-initiated control measures as well as implementation of federal and state measures to reduce emissions within their jurisdictions, with the goal of attaining the air quality standards.

AQPs are plans for reaching attainment of air quality standards. The assumptions, inputs, and control measures are analyzed to determine if the Air Basin can reach attainment for the ambient air quality standards. In order to show attainment of the standards, the District analyzes the growth projections in the valley, contributing factors in air pollutant emissions and formations, and existing and future emissions controls. The District then formulates a control strategy to reach attainment that includes both State and District regulations and other local programs and measures.

Contribution to Air Quality Violations

A measure of determining if the project is consistent with the air quality plans is if the project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the air quality plans. Because of the region's nonattainment status for ozone, $PM_{2.5}$, and PM_{10}, if project-generated emissions of either of the ozone precursor pollutants (ROG or NO_x), PM_{10}, or $PM_{2.5}$ would exceed the District's significance thresholds and were not included in the plan's growth forecast, then the project may be considered to conflict with the attainment plans. Projects requiring a General Plan Amendment may not be included in the air quality plans growth forecast. However, adding additional vacant land to the inventory may not result in an increase in the actual amount of land developed by the plan's attainment year.

As discussed in question 3c) below, emissions of ROG, NO_x, PM_{10}, and $PM_{2.5}$ associated with the construction and operation of the project would not exceed the District's significance thresholds. As shown in question 3b) below, the project would not result in carbon monoxide (CO) hotspots that would violate CO standards. Therefore, the project would not make a significant contribution to air quality violations.

Consistency with Assumptions in AQPs

The primary way of determining whether a project is consistent with the AQP's assumptions is to determine if the General Plan is consistent with the growth assumptions used in the AQPs for the Air Basin and if the project is consistent with the applicable General Plan. 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 designates locations for land uses to regulate growth. The Fresno Council of Governments uses the growth projections and land use information in adopted general plans, among other sources, to estimate future average daily trips and then vehicle miles traveled (VMT), which are then provided to the District 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 provide the amount of emission reductions required to reach attainment of the air standards based on the projected growth in

emissions and includes control measures required to achieve those reductions by the deadlines mandated by the Clean Air Act.

The applicable General Plan for the project is the City of Clovis General Plan, which was adopted in 2014 following the SJVAPCD's adoption of the latest AQPs. The land use assumptions from the new 2014 General Plan will not be incorporated into the AQP until the next plan or update is approved. The SJVAPCD is currently preparing the AQP for the 2008 8-hour ozone standard that is expected to be submitted to the United States Environmental Protection Agency (EPA) in 2016.

The Program EIR prepared for the General Plan Update found the impact of the buildout of the General Plan to be significant and unavoidable and adopted a Statement of Overriding Considerations (SOC). Projects that are consistent with the General Plan policies and comply with the mitigation measures included in the Program EIR mitigation measures are able to rely upon the SOC finding to address its cumulative air quality impacts. The PEIR indicates that application of SJVAPCD Rule 9510 – Indirect Source Review and implementation of the General Plan policies and implementation actions would reduce impacts to the extent feasible.

In this case, the project does not propose any additional development and would not be subject to Rule 9510. The project would also comply with all applicable SJVAPCD rules for demolition and dust control.

As a demolition project, there would not be an increase in population or vehicle miles traveled in the region. Therefore, the project would be consistent with the assumptions of the AQPs and would have a less than significant impact for this criterion.

Control Measures

The AQP contains a number of control measures, which are enforceable requirements through the adoption of rules and regulations. The project will comply with all of the District's applicable rules and regulations. Therefore, the project complies with this criterion and would not conflict with or obstruct implementation of the applicable air quality attainment plan. Impacts are less than significant.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than significant impact. Air pollutant emissions have regional effects and localized effects. This analysis assesses the regional effects of the project's criteria pollutant emissions compared with SJVAPCD thresholds of significance for short-term construction activities and long-term operation of the project. Localized emissions from project construction and operation are also assessed using concentration based thresholds compared with ambient air quality standards or significance thresholds.

The primary pollutants of concern during project construction and operation are ROG, NO_x, PM_{10}, and $PM_{2.5}$. The SJVAPCD's current GAMAQI adopted in March 2015 contains thresholds for ROG, NO_x; PM_{10}, and $PM_{2.5}$.

Ozone is a secondary pollutant that is formed in the atmosphere sometimes miles away from the source of emissions through reactions of ROG and NO_x emissions in the presence of sunlight. Therefore, ROG and NO_x are termed ozone precursors. The Air Basin often exceeds the state and national ozone standards. Therefore, if the project emits a substantial quantity of ozone precursors, the project may contribute to an exceedance of the ozone standard.

The Basin also exceeds air quality standards for PM_{10}, and $PM_{2.5}$; therefore, substantial project emissions may contribute to an exceedance for these pollutants. The SJVAPCD recommends its significance thresholds be used to define substantial contribution from both construction and operational emissions.

Construction Emissions

CalEEMod was used to estimate emissions from the project. Detailed modeling assumptions are provided in Appendix A of this Initial Study.

Demolition activities would commence in January 2016 and are anticipated to take 12 months to complete. If construction dates are extended to later years, emissions would decline because of ongoing advancements in off-road construction equipment technology as a result of state and federal regulations.

Table 3 provides the estimated maximum annual emissions during the project and compares them with the thresholds of significance.

Table 3: Construction Emissions (Tons per Year)

Year	ROG	NO_x	CO	PM_{10}	$PM_{2.5}$
2016	0.14	1.80	1.22	0.43	0.17
Threshold (ton/year)	10	10	100	15	15
Exceed Threshold?	No	No	No	No	No
Significant?	No	No	No	No	No
Source: CalEEMod 2013.2.2; FirstCarbon Solutions, 2015.					

As shown in Table 3, the construction emissions would be less than significant based on the SJVAPCD's thresholds of significance. It is important to note that the emissions shown above assume compliance with the SJVAPCD's Regulation VIII – Fugitive PM_{10} Prohibitions. Regulation VIII is a series of rules designed to reduce fugitive dust from construction sites, parking and staging areas, open areas, material storage areas, etc. No permits are required by this regulation, but failure to comply can result in fines and penalties. Construction contracts would require the incorporation of Best Management Practices (BMPs) to reduce fugitive dust.

The project does not include any new development; therefore, no increase in the existing operational emissions is associated the project. Accordingly, operational emissions were not estimated for the project.

Localized Pollutant Analysis

The SJVAPCD has requested that projects analyze the potential to generate or substantially contribute to a localized exceedance of criteria pollutants. A significant impact would result if the change in the NO_2, SO_2, or CO pollutant impacts from the addition of the project plus the background concentrations of these pollutants contributed by other local and regional emission sources exceeds the most restrictive ambient air quality standards. In locations that already exceed standards for these pollutants, significance is based on a significant impact level (SIL) that represents the amount that is considered a cumulatively considerable contribution to an existing violation of an air quality standard. Although the Air Basin has not violated the national ambient air quality standards or PM_{10} in the past 5 years, it has violated the state standard for PM_{10} during the past several years. The Air Basin also exceeds both the national and state $PM_{2.5}$ air standards. However, the District has not adopted local significance thresholds specifically for either PM_{10} or $PM_{2.5}$. For PM_{10} and $PM_{2.5}$, a significant impact would occur if the net change in PM_{10} or $PM_{2.5}$ exceeds the respective SILs.

The SJVAPCD has provided guidance for screening localized impacts in its GAMAQI document that establishes a screening threshold of 100 pounds per day of any criteria pollutant. If a project exceeds 100 pounds per day of any criteria pollutant, then ambient air quality modeling would be necessary. If the project does not exceed 100 pounds per day of any criteria pollutant, then it can be assumed that it would not cause a violation of an ambient air quality standard.

Construction: Localized Concentrations of PM_{10}, $PM_{2.5}$, CO, and NO_2

Local construction impacts would be short-term in nature lasting only during the duration of construction. Because of the short duration and limited amount of construction anticipated for the project, application of best management practices through compliance with Regulation VIII Fugitive Dust Prohibitions to minimize construction emissions, and levels of emissions less than the SJVAPCD's emission significance thresholds, localized construction concentrations are considered less than significant. It should also be noted that the on-site construction emissions would be less than 100 pounds per day for each of the criteria pollutants, as shown in Table 4. Therefore, based on the GAMAQI, the construction emissions would not cause an ambient air quality standard violation. Impacts would be less than significant.

Table 4: Localized Concentrations of PM_{10}, $PM_{2.5}$, CO, and NO_2 for Construction

Source	Emissions (pounds per day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Construction[1]	20.05	16.20	9.37	5.49
Significance threshold	100	100	100	100
Exceed threshold - significant impact?	No	No	No	No

Notes:
NO_x = nitrogen oxides CO = carbon monoxide PM_{10} and $PM_{2.5}$ = particulate matter
[1] Daily construction emissions reflect emissions during demolition in 2016. These are the highest daily emissions for the project.
Note: Emissions for construction and operation are on-site emissions.
Source: Appendix B.

CO Hotspot

Carbon monoxide (CO) "hot spot" thresholds ensure that emissions of CO associated with traffic impacts from a project in combination with CO emissions from existing and forecasted regional traffic do not exceed state or national ambient air quality standards for CO at any traffic intersection impacted by a project. Project concentrations may be considered significant if a CO hot spot intersection analysis determines that project generated CO concentrations cause a localized violation of the state CO 1-hour standard of 20 parts per million (ppm), state CO 8-hour standard of 9 ppm, national CO 1-hour standard of 35 ppm, or national CO 8-hour standard of 9 ppm.

The SJVAPCD's GAMAQI states that a CO hot spot analysis should be conducted if (1) a traffic study for a project indicates that the level of service (LOS) on one or more streets or at one or more intersection in the project vicinity will be reduced to LOS E or F; or (2) a traffic study indicates that a project will substantially worsen an already existing LOS F at one or more intersections.

According to the General Plan EIR, Clovis Avenue between Ashlan and Shields Avenues currently operates at an acceptable LOS C and is projected to operate at an LOS C in the cumulative 2035 scenario during the AM peak hour and LOS D in the PM peak hour. According to the California Environmental Health Tracking Program, Clovis Avenue between Ashlan and Dakota Avenues currently has a traffic volume of 26,970 vehicles per day, or roughly 2,697 AM peak-hour trips and 2,913 PM peak-hour trips.

The project would not affect the long-term LOS, since it would involve demolition only and would not add any new development that could contribute to long-term additional traffic; however, it would temporarily add traffic to the roadways during demolition. The project would implement Mitigation Measure TRANS-2, which requires the preparation of a transportation management plan to reduce potential congestion from construction traffic. It is anticipated that construction trips would not coincide with the AM and PM peak hours; however, even if all of the construction trips did occur within the AM and PM peak-hour trips, only 68 passenger car equivalent trips would be added (see Transportation/Traffic section for calculations). This would increase the AM peak-hour trips to 2,765 and the PM peak-hour trips to 2,981. This is significantly below the 44,000-peak-hour trip screening threshold the Bay Area Air Quality Management District uses to determine if additional analysis is warranted. While the SJVAPCD does not have the same screening threshold, as noted above, local roadways are not identified as operating at unacceptable conditions under existing and future buildout conditions according the City of Clovis's General Plan. In addition, the highest background 8-hour average of carbon monoxide in the last 3 years was 2.06 ppm, which is lower than the state ambient air quality standard of 9.0 ppm. Therefore, the project would not significantly contribute to an exceedance of state or federal CO standards.

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)?

Less than significant impact. The cumulative air quality analysis prepared for the project follows guidance from the SJVAPCD. In general, to result in a less than significant impact, the following must be true:

1. **Emissions analysis:** emissions of nonattainment pollutants must be below the SJVAPCD's project level significance thresholds. This is an approach recommended by the SJVAPCD in its 2002 GAMAQI.
2. **Summary of projections:** the project must be consistent with current air quality attainment plans including control measures and regulations. This is an approach consistent with Section 15130(b) of the CEQA guidelines.
3. **Cumulative health impacts:** the project must result in less than significant cumulative health effects from the nonattainment pollutants. This approach correlates the significance of the regional analysis with health effects, consistent with the court decision, *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219-20.

Emissions Analysis

Ozone is a secondary pollutant that can be formed miles away from the source of emissions through reactions of ROG and NO_x emissions in the presence of sunlight. Therefore, ROG and NO_x are termed ozone precursors. The Air Basin often exceeds the ozone standards. Therefore, if the project emits a substantial quantity of ozone precursors, the project may contribute to an exceedance of the ozone standard. The SJVAPCD established significance thresholds for ozone precursors, ROG and NO_x, and has published them in its GAMAQI. Cumulative health impacts of ozone and/or particulate matter would result if these thresholds are exceeded.

The criteria pollutant emissions analysis assessed whether the project would exceed District thresholds of significance. As shown in Table 3, criteria pollutant emissions would not exceed any threshold of significance during project demolition. In addition, operational emissions were not modeled because the project does not propose any new development and there would be no increase in the existing operational emissions. Therefore, project emissions would not cumulatively contribute to a significant impact according to this criterion.

Summary of Projections

Section 15130(b) of the CEQA Guidelines states:

> The following elements are necessary to an adequate discussion of significant cumulative impacts: 1) Either: (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

In accordance with CEQA Guidelines Section 15130(b), this analysis of cumulative impacts is based on a summary of projections analysis. Under the amended CEQA Guidelines, cumulative impacts may be analyzed using other plans that evaluate relevant cumulative effects. The air quality attainment plans describe and evaluate the future projected emissions sources in the Basin and set forth a strategy to meet both state and federal Clean Air Act planning requirements and federal

ambient air quality standards. Therefore, the plans are relevant plans for a CEQA cumulative impacts analysis. As discussed in question 3a), the project is consistent with the air quality attainment plans. Therefore, according to this criterion, this impact is less than significant.

Cumulative Health Impacts from Criteria Pollutants

The Basin is in nonattainment for ozone, PM_{10}, and $PM_{2.5}$, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (such as the elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some sensitive individuals in the population would experience health effects. However, the health effects are a factor of the dose-response curve. Concentration of the pollutant in the air (dose), the length of time exposed, and the response of the individual are factors involved in the severity and nature of health impacts. If a significant health impact results from project emissions, it does not mean that 100 percent of the population would experience health effects.

ROG and NO_x have significance thresholds because they are ozone precursor emissions. The significance thresholds for ROG and NO_x are not designed to be indicators of health effects from ROG and NO_x individually. However, one could conclude that a project would make cumulatively considerable contribution to the existing health impacts of ozone and/or secondary particulate matter if the thresholds are exceeded. The impacts are not considered a project-specific impact because project emissions of ROG and NO_x emissions from a single project would not result in a measurable change in ozone or particulate concentrations; however, the combined effects of many projects dispersed throughout the region could potentially increase concentrations or slow progress toward achieving the air quality standards. The combination of project emissions with pollutants from other sources within the Basin could cumulatively contribute to a significant impact.

The emissions analysis shown above indicates that the increase in emissions would not exceed the SJVAPCD's regional significance thresholds. The project would not result in significant cumulative health impacts.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. This discussion addresses whether the project would expose sensitive receptors to naturally occurring asbestos, construction-generated fugitive dust (PM_{10}), construction-generated diesel particulate matter (DPM), operational related toxic air contaminants (TACs), or operational CO hotspots.

A sensitive receptor is a person in a population who is particularly susceptible to health effects caused by exposure to an air contaminant. The following are land uses (sensitive sites) where sensitive receptors are typically located:

- Long-term health care facilities
- Rehabilitation centers
- Convalescent centers
- Hospitals
- Retirement homes
- Residences
- Schools, playgrounds and childcare centers

The project site itself is not a sensitive receptor. However, the closest sensitive receptor to the project site is the single-family residence located approximately 90 feet north of Building 5.

Naturally Occurring Asbestos

The California Department of Conservation maps naturally occurring asbestos (NOA) areas throughout the State of California. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The risk of disease is dependent upon the intensity and duration of exposure. California Division of Mines Open File Report 2011-1188 maps areas of the State with reported occurrences of NOA based on the location of ultramafic rock and previous asbestos mines. The mapping does not show the project site within an ultramafic rock area or mine. As such, disturbance of NOA is not a concern for the project. Therefore, potential health hazards resulting from NOA dust would be less than significant.

Asbestos-Containing Materials (ACMs) and Lead-Based Paint

As indicated in the Constraints Analysis prepared by Krazan and Associates and included in this Initial Study as Appendix D, some of the buildings did include asbestos-containing materials (ACMs) and lead-based paint. There is potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are inhaled. In addition, deterioration, damage, or disturbance of lead-based paint may result in hazardous exposure and can cause lead poisoning when consumed or inhaled. The City of Clovis will need to comply with the SJVAPCD Rule 4002 – National Emission Standards for Hazardous Air Pollutants (NESHAP), which will require a survey by a certified asbestos consultant and preparation of an Asbestos Notification Form.

Mitigation Measure HAZ-1 requires the removal and disposal of hazardous materials by licensed contractors in accordance with federal, state, and local laws. Implementation of this mitigation measure would reduce potential exposure to hazardous materials to a less than significant level.

Construction: Localized Emissions

Air pollutant emissions from project construction could create localized health impacts if the ambient air quality standards are exceeded. As shown in question 3b) above, the project would not exceed the SJVAPCD's localized significance thresholds for construction-generated emissions. Therefore, the project would not expose receptors to substantial air pollutant concentrations from construction activities.

Construction: Diesel Particulate Matter

Equipment used during construction of the project would emit DPM, which is a carcinogen. However, the DPM emissions are short-term in nature. Guidance published by the California Air Pollution Control Officers Association (CAPCOA), Health Risk Assessments for Proposed Land Use Projects, does not currently include guidance for health risks from construction projects addressed in CEQA documents; standards for receptors near construction projects are expected to be included later when the toxic emissions from construction activities are better understood. However, given the brief duration of the construction period and considering the dispersion of the emissions, exposure to potential health impacts caused by DPM would be considered less than significant.

Operation: CO Hotspot

As shown in 3(b), above, the project would not create a localized CO hotspot. Therefore, the project would not expose receptors to substantial CO concentrations from operational activities.

Conclusion

The project would not expose receptors to substantial quantities or significant concentrations of asbestos from soils disturbance; asbestos, lead, and arsenic from demolition activities; construction-generated emissions; construction-generated DPM; or CO hotspots. Therefore, the project would result in a less than significant impact.

e) Create objectionable odors affecting a substantial number of people?

Less than significant impact. Odors are generally regarded as an annoyance rather than a health hazard. People may have different reactions to the same odor. An odor that is offensive to one person may be acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor and recognition only occurs with an alteration in the intensity of the odor. Typically, odor impacts are recommended to be addressed in a qualitative manner. Such an analysis shall determine whether a project would result in excessive nuisance odors, as defined under the California Code of Regulations and Section 41700 of the California Health and Safety Code, and thus would constitute a public nuisance related to air quality.

Diesel exhaust and reactive organic compounds (ROG from paving off-gassing) would be emitted during demolition activities. However, emissions would disperse rapidly from the project site and thus would not reach an objectionable level at the nearest sensitive receptors.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
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?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Environmental Setting

The project site lies within the southern San Joaquin Valley sub region of the Central Valley and is devoid of native habitat as a result of extensive agricultural production. The project site consists of vacant disturbed land with some sparse patches of annual/ruderal vegetation that have become naturalized and have effectively excluded the growth of native perennial grass species. A Biological Resources Evaluation Report was prepared for the project site by Live Oak Associates, Inc. in November 2014, a copy of the evaluation is included in the Constraints Analysis Report included in this IS/MND as Appendix D.

The impact analysis is based on this evaluation.

Environmental Evaluation

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. According to the Biological Resource Evaluation prepared by Live Oak Associates, the project site does not provide suitable habitat for any Federal or state listed threatened and endangered species. However, the presence of trees and buildings on the project site provide suitable nesting habitat for common urban birds. The Migratory Bird Treaty Act (MBTA) is a federal law that protects most birds by prohibiting the killing, possessing, or trading in migratory birds. The MBTA encompasses whole birds, parts of birds, bird nests, and eggs. Most birds are protected from project activities, if those activities will destroy nests and young (including eggs). However, three non-native birds common to urban areas are not protected by state or federal law: the house sparrow (*Passer dometicus*), European starling (*Sturnus vulgaris*), and rock pigeon (*Columba livia*). These three species are considered by the California Department of Fish and Wildlife (CDFW) to be nuisance species that can be a threat to human health, human infrastructure, or native bird populations.

If birds other than the house sparrow, European starling, and rock pigeon were to nest on the project site prior to construction, project-related activities could result in the abandonment of active nests or direct mortality to these birds. Such an activity would constitute a violation of state and federal law and would be a potentially significant impact.

If demolition occurs during the non-nesting season (typically September 1 through February 14), no impacts are expected; however, if demolition activities are scheduled to occur during the nesting season, mitigation would be necessary to avoid potential impacts to migratory birds and their nests. Implementation of Mitigation Measures BIO-1 would reduce potential impacts to a less than significant level.

The project site may also support a wildlife nursery site for colonial roosting bat species, including three special-status species bats known to occur or that historically occurred in the region: the pallid bat, Townsend's big-eared bat, and western mastiff bat. It is not uncommon for abandoned buildings to become occupied by bats. Bat colonies can range from dozens to thousands of individuals. Live Oak Associate's biologist did not observe any signs of roosting bats; however, they were not able to survey the interior of all buildings. In addition, it is possible for bats to occupy the site in the future prior to demolition. If bats were roosting within on-site buildings prior to building demolition, demolition activities could result in the mortality of a significant number of bats. This would be a potentially significant impact.

With the implementation of Mitigation Measure BIO-2, the impact would be reduced to a less than significant level.

Mitigation Measures

MM BIO-1 In order to minimize construction disturbance to active migratory bird nests, the City shall implement one or more of the following measure(s), as necessary, prior to project implementation:

- In order to avoid impacts to all nesting migratory birds, building and tree removal shall be initiated between September 1 and January 31. This would ensure that project activities potentially impacting nesting birds would not coincide with the nesting season (February 1 to August 31).
- If building or tree removal must be initiated between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for active migratory bird nests within 15 days of the onset of these activities.
- Should any active nests be discovered in or near proposed construction zones, the biologist shall identify a suitable construction-free buffer around the nest(s). This buffer shall be identified on the ground with flagging or fencing, and shall be maintained until the biologist has determined the young have fledged.

MM BIO-2 In order to minimize construction disturbance to active bat roosts, the City shall need to implement one or more of the following measure(s), as necessary, prior to building demolition:

- The City of Clovis shall hire a qualified biologist to monitor the project site and help establish when the roosting bats are gone.
- Prior to building demolition, a qualified biologist shall conduct a pre-construction survey for roosting bats within 30 days of the onset of demolition activities.
- Should any active bat roosts be discovered, the biologist shall identify a suitable construction-free buffer around the roost. The buffer should be identified on the ground with flagging or fencing, and should be maintained until the biologist has developed an eviction plan. Eviction plans may include partial building dismantlement and/or placement of exclusion devices. The plan may restrict eviction activities during times of the year when young bats are unable to fly (generally late spring/early summer) or during cold winter months when bats may be in torpor (a type of hibernation).
- If roosting bats are present, a qualified biologist shall set up bat houses around the project site to relocate bats if any remain hibernated for the winter.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No impact. There are no riparian habitats or other sensitive natural communities located within the project site. The project site is highly disturbed and soils found on the project site are heavily compacted. No impact would occur.

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?

No impact. Wetlands or "other waters"—including lakes, rivers, streams (including intermittent streams), mud flats, sand flats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds—fall under the jurisdiction of the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act. The United States Fish and Wildlife Servce's National Wetlands Inventory does not identify wetland waters of the U.S. within and adjacent to the project site. This condition precludes the potential to have any adverse effect. No impacts would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less than significant impact with mitigation incorporated. The project site has no aquatic habitat that can support native resident or migratory fish species. It is not located within any identified wildlife movement corridor.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than significant impact. The City of Clovis has no local ordinance protecting biological resources, such as a tree-preservation ordinance. The project site does not contain any sensitive wildlife habitat, and it is located on disturbed land that contains little to no sensitive biological resources. Less than significant impacts would occur.

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?

No impact. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that is applicable to the project area. Therefore, no impact would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?	☐	☒	☐	☐

Environmental Setting

Fresno County lies within a culturally rich province of the San Joaquin Valley. Studies of the prehistory of the area show inhabitants of the San Joaquin Valley and foothills maintained fairly dense populations situated along the banks of major waterways, wetlands, and streams. Fresno County was inhabited by a number of aboriginal California Native American groups. Of the main groups inhabiting the Fresno County area, the Yokuts occupied the largest territory.

This section identifies historical resources (resources determined eligible for listing in the California Register of Historical Resources) that could be affected by the project. It presents the methods employed to identify historical resources, assesses impacts to those historical resources, and presents mitigation measures to address significant impacts. The following tasks were conducted to complete this section:

- Previous Studies Review
- Records Search and Literature Review
- Initialize Consultation with Potentially Interested Parties
- Pedestrian Survey

Previous Studies

The project area has been the subject of previous studies, conducted by or under the direction of the City of Clovis, that have either focused on or included cultural resources. These studies are summarized below.

2008 Evaluation of La Paloma Winery

In preparation for an undefined 36-acre project, the City contracted with Applied Earthworks to conduct an evaluation of La Paloma Winery for eligibility for listing in the California Register of Historical Resources (CR). The report (Nettles and Baloian 2008) found that the winery is eligible for listing in the CR under criteria 1 and 2 within two separate periods of significance (1912–1919 and 1934–1942). Although the winery consists of several buildings and landscape features, only four were identified as retaining sufficient integrity to convey their historical significance. These consist of the distillery, the fermenting and wine storage cellar, the four-story tower, and the row of palm trees within the confines of the winery.

2012 Cultural Resources Study

In support of the General Plan Update, the City contracted with SWCA to conduct a cultural resources study of the General Plan area. This study (Treffers and Dietler 2012) included a records search, substantial literature review, and outreach to Native American representatives. The study did not include a pedestrian survey or an architectural resources survey. However, several CR-eligible and potentially eligible cultural resources were identified and located on a confidential map for planning purposes. Mitigation measures were provided for the types of resources identified in anticipation of a broad range of foreseeable activities that could take place as a result of the approval of the General Plan Update. The findings and mitigation recommendations in the report (Treffers and Dietler 2012) were then carried into the General Plan and Development Code Update EIR (City of Clovis 2014a).

2014 General Plan Update CEQA Findings

In August 2014, the City certified the Final Programmatic EIR (PEIR) for the General Plan and Development Code Update, adopted associated CEQA Findings and Statement of Considerations, and adopted an accompanying Mitigation Monitoring Program (City of Clovis 2014b). The City found that the mitigation provided in the PEIR did not mitigate all environmental impacts to a less than significant level, resulting in significant unavoidable impacts. The City correspondingly adopted a Statement of Overriding Considerations that identified other benefits that outweigh the unavoidable, adverse impacts of the project in accordance with CEQA Section 21081(b) and CEQA Guidelines Section 15093. Among the significant unavoidable impacts were those to cultural resources as a result of the 2035 Scenario Full Buildout as follows:

> Impact 5.5-1, Historic Resources. The proposed General Plan Update would allow development in areas that have historic resources identified by previous cultural resource surveys and the Fresno County List of Historic Places. Development in these areas would potentially disturb historic resources. Mitigation Measure 5-1 requires historic resources assessments prior to construction of projects that may impact historic resources. Mitigation Measures 5-2 and 5-3 would reduce impacts to historic resources; for instance, Mitigation Measure 5-3 requires recording resources. However, impacts to historic resources would remain significant and unavoidable for both the 2035 Scenario and Full Buildout.

These mitigation measures (5-1, 5-2, 5-3) discuss impacts to *historic resources*; in this context, it is intended to refer solely to cultural resources that are buildings, structures, or objects (also known as the *built environment*).

The remaining General Plan Mitigation Measures address archaeological resources (5-4 and 5-5) and paleontological resources (5-6 and 5-7) and do reduce the impacts to less than significant levels.

2014 Constraints Analysis and Recordation of La Paloma Winery

The City contracted with Krazan & Associates and J&R Environmental Services to conduct special studies to address potential constraints to the proposed redevelopment of the La Paloma Winery property. The constraints analysis (Krazan & Associates 2014) states that the City plans to demolish the winery, which would result in a significant adverse impact to the environment. The report explains that all feasible mitigation must be pursued, however, even if doing so does not mitigate below a level of significance. In pursuit of a feasible mitigation in which an archival record of the winery would be provided, J&R Environmental (2014) recorded the eligible portions of La Paloma Winery. In addition, J&R Environmental elected to record one of the non-eligible industrial buildings. Recordation was consistent with the level set forth by the National Park Service (NPS) Historic American Building Survey (HABS) Guidelines.

Records Search and Literature Review

On August 5, 2015, the staff at the Southern San Joaquin Valley Information Center (SSJVIC) at California State University, Bakersfield conducted a record search at the request of FirstCarbon Solutions (FCS) staff. The records search was conducted to identify known cultural resources (archaeological and built) that could be impacted by the proposed project and to determine the sensitivity for the presence of cultural resources that could be impacted by the project. The records search was conducted for the project area and a 0.5-mile radius surrounding the project area. Sources consulted consisted of the Directory of Properties in the Historic Property Data File (CA OHP 2012a) and the Archaeological Determinations of Eligibility (CA OHP 2012b) for Fresno County.

The records search indicates that no other cultural studies other than the winery evaluation conducted by Nettles and Baloian (2008) have been conducted within the project area. Although that study shows complete coverage of the project area, a review of the report indicates no survey for archaeological resources was conducted as part of the study. Four surveys have been conducted within the larger 0.5-mile radius (Bowie 1998; Cursi 1981; Baker and Maniery 2007; O'Connell 2002); however, only one cultural resource (P-10-5197) has been identified within this 0.5-mile radius. Even so, only approximately 10 percent of the 0.5-mile radius has been surveyed specifically for archaeological resources. Because no archaeological resources have been identified within the project area or the 0.5-mile radius and the project area lacks full survey coverage, additional literature review was conducted to ascertain the likelihood that archaeological resources may exist below ground surface.

To determine the likelihood of past human use and the likelihood of preservation of cultural materials in the project area, review of a variety of sources focused on the cultural preferences of local prehistoric populations in terms of natural resource interaction, the historic activities that

occurred or may have occurred in the project area, the natural environment in terms of resources amenable to human use, and the underlying soils and geology. Sources reviewed included the cultural section of the 2014 General Plan, historic USGS topographical quadrangles, online sources through the UC Davis Soil Lab, geologic maps of the region, historic maps of the township and range, and associated land patent data, hydrologic maps, ethnographic sources, and historic overviews of the region.

The project area is located within the San Joaquin Valley section of the Great Valley Province. This Province is a broad alluvial plane, extending from the northern part of the Sacramento Valley to the southern part of the San Joaquin Valley, approximately 400 miles long and 50 miles wide. It is essentially a trough in which sedimentation has been accumulating for the past 208 million years. Sediments in the San Joaquin Valley average approximately 2400 feet in thickness (CGS 2002a, 2002b). The ancient sediments in the project area (the geologic context) is composed of Pleistocene era river and lake sediments (Matthews and Burnett 1965). This geologic context could contain nonrenewable paleontological resources (City of Clovis 2014a).

Soils overlying this thick bed of ancient sedimentation in the project area consist of acidic (6 to 4 pH) coarse loam of the Atwater series that occur to maximum depths of 152 centimeters (cm) (UC Davis California Soil Resource Lab 2008). This level of acidity creates an environment in which organic materials cannot maintain their cellular structure over time; thus, organic archaeological materials (bone, natural fibers, organic waste, etc.) are not likely to be found in this context.

The topography and climate of the region is relatively flat and dry at the interstices between the Sierra Nevada foothills and the valley floor (Wallace 1978). Natural water resources consist of the San Joaquin River 7.5 miles to the northwest and the Kings River 12.5 miles to the southeast. No year-round natural creeks or springs existed in the project vicinity (GLO 1854; Matthews and Burnett 1965). Ethnographic villages are documented along natural waterways, the nearest of these villages identified 13.5 miles north and 13 miles southeast of the project area (Wallace 1978). Given this natural environment, prehistoric use of the project vicinity was likely limited to resource procurement such as gathering plant materials and hunting mammals.

Historic-period use of the area was limited to agricultural purposes (livestock grazing and grain growing) until the Southern Pacific Railroad's San Joaquin Valley line was surveyed and constructed, prompting the establishment of the town of Clovis (Gudde 1974). The project area, situated south of the Clovis downtown area, was not developed until Mr. Tarpey constructed his winery here in 1912 (Sanborn Map Company 1904, 1907, 1912, 1929; USGS 1923).

Initiate Consultation with Potentially Interested Parties

On August 5, 2015, FCS sent a request to the Native American Heritage Commission (NAHC) to review its sacred lands file search and to provide a consultant list of Native Americans who may have an interest in or knowledge of cultural resources that could be impacted by the project. The request included summary information regarding the project and its location. A second e-mail following up on the initial request was sent to the NAHC on August 20, 2015, and a phone call was placed to the NAHC on August 28, 2015. The NAHC provided a response dated September 10, 2015. The NAHC

indicated that the search of the Sacred Lands Files resulted in negative results for the project site. The NAHC provided a list of 18 tribal representatives who should be consulted regarding potential adverse impacts to tribal resources. Requests for consultation were sent to the 18 different tribal representatives on September 14, 2015. As of this date, no response has been received from the tribal representatives. Copies of the letter to the NAHC and the consultation letters are provided in Appendix C of this Initial Study.

On August 18, 2015 a letter was sent to the Clovis Big Dry Creek Historical Society notifying it of the proposed project. The letter requested any additional information pertaining to cultural resources in the vicinity of the project area. As of this date, no response has been received.

Pedestrian Survey

On August 14, 2015, FCS Archaeologist Dana DePietro, PhD conducted a pedestrian survey of the entire project area. Because the entire project area has been developed and covered in concrete, asphalt, or landscaping, very little of the natural soil was visible. Areas covered in such landscaping were cursorily surveyed in transects measuring 30 meters wide.

Large swaths of exposed surface at the northeast and southeast corners of the site were surveyed in transects measuring no more than 15 meters wide. These areas had been recently plowed, and soil visibility was good, ranging from 70 to 90 percent. Soils were silty, medium-brown in color, and interspersed with many cobbles of slate, quartz, and schist. Clear glass bottle shards that appear to date from the period of the winery's operation are located throughout the plowed, exposed sections of the project area. No other cultural materials were encountered during the course of the survey.

Environmental Evaluation

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less than significant impact with mitigation incorporated. The La Paloma Winery is eligible for listing in the CR under criteria 1 and 2, for its association with the early Fresno region wine industry and its association with Michael Tarpey, a significant individual. It has two periods of significance: 1912 to 1919 and 1934 to 1942. Four elements of the winery have been identified as retaining sufficient integrity to convey their significance from these time periods: the distillery (Building 1), the fermenting and storage cellar (Building 2), the four-story tower (Building 3), and a row of palm trees. The proposed project would demolish Building 2, resulting in a significant impact.

CEQA Guidelines Section 15063(b)(1)(b) provides guidance in the situation wherein the agency determines that there is substantial evidence that any aspect of the project may cause a significant effect on the environment. In such instance, the agency has three options, one of which is to use a previously prepared EIR that the lead agency determines would adequately analyze the project at hand. The impact to this resource was addressed in the 2014 General Plan (City of Clovis 2014a) and the City's subsequent CEQA Findings and subsequent Statement of Overriding Considerations (City of

Clovis 2014b). As discussed above, the City found that the mitigation provided in the PEIR would not mitigate the impact to historic resources to a less than significant level, resulting in significant unavoidable impacts. The City correspondingly adopted a Statement of Overriding Considerations that identified other benefits outweigh the unavoidable, adverse impacts of the project in accordance with CEQA Section 21081(b) and CEQA Guidelines Section 15093.

Using the previously prepared 2014 General Plan PEIR, the City determines that the current project will have a significant unavoidable impact on La Paloma Winery but that other benefits outweigh the unavoidable, adverse impacts of the project.

Regardless of the above determination, CEQA requires that all feasible mitigation must be pursued, even if it does not mitigate below a level of significance. In anticipation of this project, the City has recorded the eligible portions of La Paloma Winery (J&R Environmental 2014). Recordation approximated the level set forth by the NPS HABS Guidelines. While drawings and photographs may not mitigate the impact to a level below a significant adverse impact ". . . recordation serves as a legitimate archival purpose" (14 CCR §15126.4[b]).

In pursuit of all feasible mitigation, the City will also implement Mitigation Measures CUL-1 and CUL-2.

Mitigation Measures

MM CUL-1 The City of Clovis shall erect permanent signage in reasonable proximity to the site in order to inform and educate the public about its historic nature. This signage should include historic photographs of the winery complex, as well as information pertaining to its important role in the City's development and association with the Tarpey family as detailed in Department of Parks and Recreation Primary Record P-10-005837.

MM CUL-2 The City of Clovis shall prepare a document presenting the history of La Paloma Winery and its significance. This document may take the form of a booklet or a website accessible to the public through the local library or through the City's website. The document may also be made available to purchase at local stores and at the local historical society, the proceeds of which would be donated to the local historical museum and/or historical society.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than significant impact with mitigation incorporated. Based on the records search results and literature review discussed above, the project area does not appear to be sensitive for the presence of prehistoric or historic-period archaeological resources. Although little archaeological research has been conducted in the area, the area appears to have been the location of little human activity that would leave cultural materials in place. It is therefore unlikely that subsurface archaeological deposits will be identified as a result of any planned or future ground-disturbing activities.

Despite the low likelihood of the presence of archaeological resources in the project area, it is always possible that ground-disturbing activities may encounter previously undiscovered and significant archaeological resources. Disturbance of significant archaeological resources could result in a significant impact. The implementation of MM CUL-3 (which is adapted from Mitigation Measure 5-5 in the City of Clovis General Plan) would reduce this impact to a less than significant level.

Mitigation Measures

MM CUL-3 Should any cultural resources, including human remains, be discovered during project implementation, no further ground-disturbing activities shall occur in the area of the discovery until the City Planning Director concurs in writing that adequate provisions are in place to protect these resources. Unanticipated discoveries shall be treated in accordance with applicable state law and evaluated for significance by a professional archaeologist that meets the Secretary of Interior's Professional Qualifications Standards. If significance criteria are met, then the project shall be required to protect the resource through avoidance or mitigate impacts to the resource by performing data recovery; curate materials with a recognized scientific or educational repository; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation Series 523 forms.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than significant impact with mitigation incorporated. The proposed project area has the potential to contain nonrenewable paleontological resources below the Atwater soil horizons, which generally occur to a maximum depth of 152 cm. Disturbance of significant paleontological resources could result in a significant impact. The implementation of MM CUL-4 (which is adapted from Mitigation Measure 5-7 in the City of Clovis General Plan) would reduce this impact to a less than significant level.

Mitigation Measures

MM CUL-4 Should any potentially significant fossil resources be discovered during project implementation, no further ground-disturbing activities shall occur in the area of the discovery until the City Planning Director concurs in writing that adequate provisions are in place to protect these resources. Unanticipated discoveries shall be treated in accordance with applicable state law and evaluated for significance by a certified professional paleontologist that meets the Secretary of Interior's Professional Qualification Standards. If significance criteria are met, then the project shall be required to protect the resource through avoidance or mitigate impacts to the resource by performing data recovery, professional identification, radiocarbon dates as applicable, and other special studies; curate materials with a recognized scientific or education repository; and provide a comprehensive final report, including catalog with museum numbers.

d) Disturb any human remains, including those interred outside of formal cemeteries?

Less than significant impact with mitigation incorporated. No human remains are known to exist within the project site. However, there is always the possibility that subsurface construction activities associated with the proposed project, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Therefore, if human remains are discovered, implementation of MM CUL-5 would reduce this potential impact to a less than significant level.

Mitigation Measures

MM CUL-5 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code § 7050.5; Public Resources Code § 5097.94 and § 5097.98 must be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.
2. Where the following conditions occur, the landowner or his authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance:
   - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission.
   - The descendant identified fails to make a recommendation.
   - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

e) Cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

Less than significant impact with mitigation incorporated. The project site is not a likely area for Native American populations to have inhabited, as Native American populations in Central California tended to occupy sites near waterways. Additionally, no Native American features, artifacts, or resources were discovered during the course of the field survey. Requests for consultation were sent to 18 different tribal representatives seeking their input on potential adverse impacts to cultural resources as a result of project implementation. No responses have been received, which may indicate the project site has a low potential to affect tribal resources. However, subsurface construction activities such as trenching and grading associated with the project could potentially disturb previously undiscovered tribal resources. Accordingly, this is a potentially significant impact. Mitigation is proposed to reduce this potentially significant impact to a level of less than significant.

Mitigation Measures

MM CUL-6 Should any tribal resources be discovered during project implementation, no further ground-disturbing activities shall occur in the area of the discovery until the City Planning Director concurs in writing that adequate provisions are in place to protect these resources. Unanticipated discoveries shall be treated in accordance with applicable state law and evaluated for significance by a professional archaeologist that meets the Secretary of Interior's Professional Qualifications Standards.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. 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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Environmental Setting

The project is located in the City of Clovis, which is located in the San Joaquin Valley. The San Joaquin Valley project is located in a seismically active part of northern California. Many faults in the San Francisco Bay Area are capable of producing earthquakes, which may cause ground shaking at the site. The nearest fault to the project site is the Clovis Fault located approximately 6 miles northeast of the project site. The Clovis Fault is not mapped as active, and is mapped as showing no recognized displacement in the Quaternary Period, that is, within the last 1.6 million years. No other faults within 50 miles of the project site are mapped on the 2010 Fault Activity Map of California.

Environmental Evaluation

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.

No impact. The 1972 Alquist-Priolo Earthquake Fault Zoning Act required the State Geologist to establish regulatory "Earthquake Fault Zones" around the surface ruptures of active faults, in order to mitigate the hazard of surface fault rupture to structures for human occupancy. A fault is considered active if it has ruptured within the last 11,000 years. The project site is not located within or near an Alquist-Priolo Earthquake Fault Zone, and no mapped evidence of active or potentially active faulting was found near the project site. In addition, the project includes demolition of six existing buildings and site preparation. No structural development will be undertaken as a part of the project, and, therefore, the project would not expose people or structures to potential substantial adverse effects involving the rupture of a known earthquake fault, and no impact would occur.

ii) Strong seismic ground shaking?

No impact. Ground shaking—motion that occurs as a result of energy released during faulting—could result in damage or collapse of buildings and other structures, depending on the magnitude of the earthquake, the location of the epicenter, and the character and duration of the ground motion. Other factors that determine the amount of potential damage from strong seismic ground shaking are the characteristics of the underlying soil and rock, the building materials used, and the workmanship of the structure. Ground shaking is expressed in terms of peak ground acceleration (PGA) using a percentage of gravity (g) or a percentage of the earth's normal gravitational strength. The intensity of ground shaking depends on the distance from the earthquake epicenter to the site, the magnitude of the earthquake, site soil conditions, and the characteristic of the source.

No structural development will be undertaken as a part of the project, only demolition and site preparation activities. Therefore, the project would not expose people or structures to potential substantial adverse effects related to seismic shaking, and no impact would occur.

iii) Seismic-related ground failure, including liquefaction?

No impact. Liquefaction is a process by which water-saturated materials (including soil, sediment, and certain types of volcanic deposits) lose strength and may fail during strong ground shaking. Liquefaction occurs when granular material is transformed from a solid state into a liquefied state as a consequence of increased pore-water pressure. Liquefaction is most commonly induced by strong ground shaking associated with earthquakes. In some cases, a complete loss of strength occurs and

catastrophic ground failure may result. Factors determining the liquefaction potential are soil type, the level and duration of seismic ground motions, the type and consistency of soils, and the depth to groundwater. As mentioned previously in Section 6a) i) and a) ii) above, the project site is not located in a seismic hazard zone and is not susceptible to strong ground shaking and thus would not be considered to be at risk from liquefaction hazards. In addition, no structural development will be undertaken as a part of the project only demolition and site preparation activities. Therefore, the project would not expose people or structures to potential substantial adverse effects related to liquefaction, and no impact would occur.

iv) Landslides?

No impact. Ground failure including landslides is dependent on slope and geology as well as the amount of rainfall, excavation, or seismic activities. As discussed above in Section 6a) ii), Fresno County is not located in a seismic hazard zone; thus, the project site is not considered at risk from landslides as a result of active faulting. Areas with slopes greater than 20 percent have an elevated risk of landslide and erosion. According to the Fresno County Multi-Hazard Mitigation Plan, there is no risk of large landslides caused by earthquakes in the valley area of the County, due to its relatively flat topography (Fresno County 2009). The project site is located within an area that is generally flat where there is no imminent likelihood for landslides to occur. Therefore, the project would not expose people or structures to potential substantial adverse effects related to landslides, and no impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

Less than significant impact with mitigation incorporated. Construction activities associated with the project would not involve any extensive grading or excavation activities. These activities could expose barren soils to sources of wind or water, resulting in the potential for erosion and sedimentation on and off the project site. The project would involve demolition of six existing buildings on-site and site preparation activities. During this period, nuisance flow caused by minor rain could flow off-site. The City would employ appropriate sediment and erosion control BMPs pursuant to Mitigation Measure GEO-1 to minimize the potential for erosion and sedimentation as part of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would be prepared in accordance with contract specification and with California National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges associated with construction activity. Therefore, the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

Mitigation Measures

MM GEO-1 The City shall employ appropriate sediment and erosion control Best Management Practices to protect water quality during the construction of the project.

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?

No impact. Subsidence is typically related to over extraction of groundwater from certain types of geologic formations, such as fine-grained sediments where the water is partly responsible for supporting the ground surface. As previously discussed in question 6a)iii), the project site's liquefaction and landslide potential is low. The United States Department of Agriculture Natural Resources Conservation Service indicates that Atwater sandy loam and Greenfield sandy loam underlies the project site. This soil is not susceptible to subsidence. In addition, no structural development will be undertaken as a part of the project only demolition and site preparation activities. Therefore, the project would not result in landslides, lateral spreading, subsidence, liquefaction, or collapse, no impact would occur.

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?

No impact. Soils with high clay content are usually expansive. Minerals in certain clays swell with increased moisture content and then contract during dry periods. The soil's volume changes can damage shallow building foundations and pavement. On slopes, the continuous shrinking and swelling of expansive soils can cause the soil to migrate downslope.

The United States Department of Agriculture Natural Resources Conservation Service indicates that Atwater sandy loam and Greenfield sandy loam underlies the project site. These well-drained sandy loams have a low potential for expansion. While surface soils may have relatively lower levels of cohesion, the underlying materials are more stable. In addition, no structural development will be undertaken as a part of the project only demolition and site preparation activities. As such, there would be no impact related to expansive soils.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No impact. The project does not include the construction, replacement, or disturbance of septic tanks or alternative wastewater disposal systems. No impact would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Setting

The project is located in the City of Clovis, which is located in the San Joaquin Valley Air Basin under the jurisdiction of the SJVAPCD. The City of Clovis does not have an adopted greenhouse gas reduction plan.

Environmental Evaluation

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than significant impact. The project may contribute to climate change impacts through its contribution of greenhouse gases. The project would generate a variety of greenhouse gases during construction and operation, including several defined by Assembly Bill (AB) 32, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) from the exhaust of equipment and the exhaust of vehicles for employees, visitors, and construction hauling trips. The project may also emit greenhouse gases that are not defined by AB 32. For example, the project may generate aerosols from DPM exhaust. Aerosols are short-lived greenhouse gases, as they remain in the atmosphere for approximately one week. The project would emit NO_x and reactive organic compounds (ROG), which are ozone precursors. Ozone is a greenhouse gas; however, unlike the other greenhouse gases, ozone in the troposphere is relatively short-lived and is being reduced in the troposphere on a daily basis.

Certain greenhouse gases defined by AB 32 would not be emitted by the project. Perfluorocarbons (PFCs) and sulfur hexafluoride (SF_6) are typically used in industrial applications, none of which would be used by the project. Therefore, it is not anticipated that the project would emit PFCs or SF_6.

The SJVAPCD does not have a recommendation for assessing the significance of construction-related emissions. The construction-related emissions would occur prior to the year 2020, which is the year

the State is required to reduce its greenhouse gas emissions to 1990 levels. Additionally, emissions from construction would be temporary.

CalEEMod was used to estimate emissions from the project. Detailed information on the assumptions included in the modeling are included in this Initial Study as Appendix A, Air Quality and Greenhouse Gas Modeling Assumptions and Modeling Output.

Table 5 shows the estimated annual metric tons of carbon dioxide equivalents ($MTCO_2e$).

Table 5: Greenhouse Gas Construction Emissions (Annual $MTCO_2e$)

Year	$MTCO_2e$
2016	344
Source: CalEEMod Version 2013.2.2	

The construction-related emissions would occur prior to the year 2020, which is the year the State is required to reduce its greenhouse gas emissions to 1990 levels. The total greenhouse gases from construction would be 344 $MTCO_2e$. It should be noted that the annual construction emissions would be significantly less than the 25,000 $MTCO_2e$ reporting threshold in the ARB's cap and trade program. Therefore, any construction-related emissions would be less than significant.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Less than significant impact. There are currently no adopted local or regional greenhouse gas reduction plans applicable to the project.

The Scoping Plan states, "The 2020 goal was established to be an aggressive, but achievable, mid-term target, and the 2050 GHG emissions reduction goal represents the level scientists believe is necessary to reach levels that would stabilize climate" (ARB 2008). The year 2020 greenhouse gas emission reduction goal of AB 32 corresponds with the mid-term target established by Executive Order S-3-05, which aims to reduce California's fair-share contribution of greenhouse gases in 2050 to levels that would stabilize the climate.

Construction of the project is estimated to generate greenhouse gases. However, AB 32 requires that greenhouse gas emissions generated in California in year 2020 be equal to or less than California's statewide inventory from 1990. Construction emissions would occur before the year 2020, so the project's construction would not contribute to year 2020 emissions. Therefore, construction emissions would not conflict with the AB 32 Scoping Plan.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
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?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Environmental Setting

A Phase I Initial Site Assessment (Phase I ISA) was prepared by Krazan and Associates, Inc. as part of the Constraints Analysis Report in March 2015 for the project and is included in this Initial Study in Appendix D. The analysis herein is summarized from the Phase I ISA.

Hazardous materials are defined by the California Code of Regulations as substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic: causes human health effects
- Ignitable: has the ability to burn
- Corrosive: causes severe burns or damage to materials
- Reactive: causes explosions or generates toxic gases

The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. The project site is currently not listed on any federal, state, regional, or local hazardous materials databases.

Environmental Evaluation

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than significant impact with mitigation incorporated. This impact will evaluate the project's potential to create hazards caused by the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Construction of the project would involve the routine transport and handling of hazardous substances such as diesel fuels, lubricants, solvents, and asphalt. Handling and transport of these materials could result in the exposure of workers to hazardous materials. However, the project would not create a significant hazard to the public or the environment because project construction would comply with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials, and BMPs would include spill prevention and cleanup measures applicable to hazardous waste.

As indicated in the Constraints Analysis Report, asbestos was used during the construction of the La Paloma tower building. There is potential for exposure when ACMs become damaged to the extent that asbestos fibers become airborne and are inhaled. The scope of work for the asbestos survey included conducting a visual survey of the tower building structure and conducting bulk sampling and analysis of materials suspected to contain asbestos. This survey was performed in accordance

with applicable local, state, and federal regulations. Twenty-six samples of suspected ACMs were collected from throughout the structure. Based upon the sampling and laboratory analysis, the following materials were identified as containing at least one percent asbestos:

- Floor tile mastic – daycare restrooms (Sample No. 18). This material would be considered a Category I non-friable ACM under the NESHAP Regulations.
- Roof mastic – roof patches (Sample No. 26). This material would be considered a Category I non-friable ACM under the NESHAP Regulations.

The NESHAP defines regulated asbestos-containing materials (RACM) as the following:

a) Friable materials containing more than one percent asbestos as determined by polarized light microscopy;

b) Category I non-friable materials (i.e., floor tiles, asphalt roofing products) containing more than one percent asbestos that have become friable, have been subjected to or will be subjected to sanding, grinding, cutting, or abrading; and

c) Category II non-friable materials (i.e., non-friable asbestos-containing materials that are not Category I materials) containing more than one percent asbestos that have a high probability of becoming or have already been reduced to a friable condition by demolition or renovation activities.

The above-noted samples that contain greater than one percent asbestos may meet the definition of a RACM under the NESHAP depending on the abatement method employed. In addition, the California Division of Occupational Safety and Health (Cal-OSHA) defines asbestos-containing construction material (ACCM) as greater than 0.1 percent asbestos. The above-noted samples that contain greater than 0.1 percent asbestos would meet the definition of an ACCM.

Because the project involves the demolition of six buildings, removal of friable and non-friable ACMs that have the potential to become friable during demolition is federally regulated under the NESHAP. The SJVAPCD is the responsible agency on the local level to enforce the NESHAP. The SJVAPCD Regional Office requires that ACMs be removed prior to demolition activities. Additionally, the SJVAPCD must be notified prior to any demolition activities.

The Constraints Analysis Report also surveyed for a possibility of any lead-based paint on existing buildings. Occupational exposure to lead is regulated by both the Federal Occupational Safety and Health Administration (OSHA) and Cal-OSHA. All construction work where an employee may be occupationally exposed to lead containing paint, including building renovation and demolition, must comply with OSHA Regulation 29 CFR 1926.62 and Cal-OSHA Title 8, CSO 1532.1. These regulations requires initial employee exposure monitoring to evaluate worker exposure during work that disturbs lead containing paint.

The lead-based paint survey found that Building A, Building B, the Tower Building, and the open air vats contained lead based paint. Lead based paint is defined as paints with 0.5 percent or greater

total lead by weight. Additionally, Building A, Building B, the Tower Building, and the open air vats contained lead-containing paint. Lead-containing paint is defined as paints with greater than 0.009 percent total lead by weight.

Krazan and Associates, Inc. recommended that engineering controls and air monitoring for airborne lead be conducted at the start of projects in which worker exposure to lead containing paint is likely.

Mitigation Measure HAZ-1 requires the proper notification and removal of hazardous materials by licensed contractors. Through adherence to the mitigation measure, and to state and federal regulations as identified in the Constraints Analysis Report, the project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Mitigation Measures

MM HAZ-1 Prior to commencement of demolition, the City shall comply with the SJVAPD Rule 4002 for asbestos removal and shall incorporate recommendations from the Constraints Analysis for the protection from airborne lead. The City shall have a licensed contractor properly remove and dispose of these hazardous materials in accordance with federal, state, and local laws. These substances shall be disposed of at an approved disposal facility as determined by the materials' characteristics.

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?

Less than significant impact. As mentioned in Section 8a) above, the project may result in the release of hazardous materials during the demolition of existing buildings. While the project would involve the short-term handling of hazardous materials during construction, the handling and storage of said materials during construction would comply with all applicable local state and federal standards. In addition, the project involves the removal and disposal of identified hazardous materials, which include asbestos, lead based paint, and lead-containing paint. Removal of hazardous materials would require compliance with state and federal regulations. As such, the project would not create a significant hazard to the public involving the release of hazardous materials into the environment, and impacts would be less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No impact. The closest school is Miramonte Elementary School, which is located approximately 0.40 mile east of the project site. No schools are located within 0.25 mile of the project site. This condition precludes the possibility of activities associated with the proposed project exposing schools within a 0.25-mile radius of the project site to hazardous materials. No impact would occur.

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?

No impact. The project site is not listed on California's Department of Toxic Substances Control Hazardous Waste and Substances List (DTSC 2015) or the (EPA 2013), nor is it located in the vicinity of any listed sites. Because the project is not listed as a hazardous materials site, the project would not create a significant hazard to the public or the environment, and thus, no impact would occur.

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?

Less than significant impact. The nearest public airport is the Fresno Yosemite International Airport, which is located approximately 1 mile southwest from the project site. The project site is not within the Airport Land Use Compatibility Plan. As previously discussed, no structural development will be undertaken as a part of the project, only short-term demolition and site preparation activities. Therefore, no impacts associated with public airport hazards would occur.

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?

No impact. There are no private airstrips located in the project area. Additionally, no structural development will be undertaken as a part of the project, only short-term demolition and site preparation activities. Therefore, no impact associated with private airstrip hazards would occur.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than significant impact. The proposed project does not include any characteristics (e.g., permanent road closures) that would physically impair or otherwise interfere with emergency response or evacuation in the project vicinity. These conditions preclude the possibility of the proposed project conflicting with an emergency response or evacuation plan. Construction activities, which include demolition of existing buildings and site preparation activities, would not significantly affect the circulation of emergency services through the project area in the event of a major emergency. Therefore, the project does not impair implementation of or physically interfere with an adopted emergency response or evacuation plan, and impacts would be less than significant.

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?

No impact. According to the California Department of Forestry and Fire Protection, the project site is outside an area susceptible to wildland fire hazard and is not located in either a State Responsibility Area or Local Responsibility for Fresno County (DFFP 2012). Additionally, no structural development will be undertaken as a part of the project, only short-term demolition and site

preparation activities. The project would remove overgrown vegetation and clean up the project site so that there is little potential fire hazards. Therefore, no impacts associated with wildlands fire would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
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?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Environmental Setting

Drainage

The City of Clovis is in three hydrologic areas (Fresno, Academy, and Humphry's Station), all of which are parts of the South Valley Floor hydrologic unit. The project site is located in the Fresno hydrologic area.

The project is located in an area that is served by a network of storm drains that discharge into retention basins, most of which provide drainage for a one- to two-square-mile area. Detention and retention basins in the Fresno Metropolitan Flood Control District's (FMFCD's) flood control system are sized to accommodate stormwater from each basin's drainage area in buildout condition. The current capacity standard for FMFCD basins is to contain runoff from 6 inches of rainfall during a 10-day period and to infiltrate about 75 to 80 percent of annual rainfall into the groundwater basin (City of Clovis 2014).

In addition to their flood control and water quality functions, many FMFCD basins are used for groundwater recharge with imported surface water during the dry season through contracts with the Fresno Irrigation District and the cities of Fresno and Clovis; such recharge totaled 29,575 acre feet during calendar year 2012 (City of Clovis 2014).

The pipeline collection system in the urban flood control system is designed to convey the peak flow rate from a two-year storm. Most drainage areas in the urban flood control system do not discharge to other water bodies, and drain mostly through infiltration into groundwater. When necessary, FMFCD can move water from a basin in one such drainage area to a second such basin by pumping water into a street and letting water flow in curb and gutter to a storm drain inlet in an adjoining drainage area (City of Clovis 2014).

Groundwater

Clovis is underlain by the Kings Groundwater Basin that spans 1,530 square miles of central Fresno County and small areas of northern Kings and Tulare counties. The Kings Subbasin has been identified as critically overdrafted (City of Clovis 2014).

Flood Hazards

The urban areas of Clovis are largely protected from flooding through the use of the flood control infrastructure maintained by the FMFCD. Regionally, the major flood issues are associated with the San Joaquin River, the Kings River, and their tributaries.

Environmental Evaluation

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less than significant impact. Demolition of six existing buildings and site preparation activities would require ground-disturbing work. Vehicles and various construction-related activities (e.g., site

preparation) that would make these areas susceptible to erosion by stormwater runoff would disturb the project site. Site preparation activities would temporarily decrease vegetative cover and increase the potential for soil erosion until vegetation is re-established, which could cause a temporary increase in suspended solids in runoff and local receiving waters.

In addition to impacts from erosion, impacts to runoff water quality during construction could potentially result from leaks or spills of fuel or hydraulic fluid used in construction equipment; outdoor storage of construction materials; or spills of paints, solvents, or other potentially hazardous materials commonly used in construction.

A Storm Water Pollution Prevention Plan (SWPPP), in accordance with contract specification and with California NPDES General Permit for Stormwater Discharges associated with construction activity would be implemented as part of the project. The SWPPP would require the implementation of appropriate construction BMPs, in accordance with Caltrans's Construction Site Best Management Practices Manual and would ensure no water quality standards or waste discharge requirements would be violated. Construction BMPs may include but not limited to stabilized construction entrances, straw wattles on embankments, and sediment filters on existing inlets. Additionally, the SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants, should any of the BMPs fail; and a sediment monitoring plan, should the site discharge directly into a water body listed on the 303(d) list for sediment. Section A of the Construction General Permit lists all elements that must be contained in a SWPPP.

The intent of the NPDES provision is to enforce federal, state, and other local agencies regulations designed to eliminate stormwater pollution. Implementation of regulatory permit requirements along with construction BMPs minimize any construction effects on local water quality.

The preparation, implementation, and participation with both the NPDES General Permit and the Construction General Permit, including the SWPPP and BMPs, will reduce project demolition and site preparation impacts on erosion to acceptable levels. Therefore, short-term construction impacts associated with water quality standards will be less than significant.

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?

Less than significant impact. The project would not require long-term water supplies, but would require water for dust suppression during construction. Water required during construction would be obtained from existing entitlements or brought in from the City's recycled water plant; therefore, the project would not deplete existing groundwater supplies. The project is not in an area identified as a groundwater recharge area, therefore it would not interfere with groundwater recharge. The soil in the project area comprises Atwater sandy loam and Greenfield sandy loam. These soils are characterized as well-drained, with low runoff and high permeability. It should be noted that the project would remove impermeable surfaces; therefore, additional groundwater recharge may occur. No structural development will be undertaken as a part of the project; therefore, the project would

not substantially deplete groundwater supplies and would not affect groundwater recharge such that a net deficit would occur. Impacts would be less than significant.

c) Substantially alter the existing drainage pattern of 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?

Less than significant impact. No structural development will be undertaken as a part of the project, only demolition of six existing buildings and site preparation activities. Removal of buildings and vegetation on-site could temporarily alter the existing drainage within the project site. However, as addressed in Impact 9 (a), the preparation, implementation, and participation with both the NPDES General Permit and the Construction General Permit, including the SWPPP and BMPs, will reduce project demolition and construction impacts on erosion to less than significant would ensure that potential construction erosion and siltation would not affect drainage facilities on-site. Therefore, impacts would be less than significant.

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?

Less than significant impact. While the project would potentially result in temporary minor alterations to local drainage patterns, as described above in Section 9c), implementation of the SWPPP and construction BMPs would help to alleviate any potential impacts resulting from the project. Therefore, the project would not substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river, and would not substantially increase the rate or amount of surface runoff that would result in flooding. Impacts would be less than significant.

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?

Less than significant impact. The project would not alter the existing stormwater drainage system designed to collect and contain surface runoff. Nearby land uses are residential in nature and is within a developed area access to existing stormwater drainage systems within the project area. The project would demolish six existing buildings and would undertake site preparation activities. Construction activities would decrease the amount of impervious surfaces, which would result in an insignificant decrease in runoff. In addition, as described above in Section 9a), implementation of the SWPPP and construction BMPs would reduce any potential sedimentation and pollution impacts during construction. Therefore, the project would not provide substantial additional sources of polluted runoff, and impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less than significant impact. As previously indicated, standard construction erosion control measures as well as the SWPPP would be implemented as a part of the project and would ensure

that potential construction erosion would be minimized and would not degrade water quality. Impacts would be less than significant.

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?

No impact. No structural development will be undertaken as a part of the project, only demolition and site preparation activities. The project does not involve the construction of housing, and, therefore, no impact would occur.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No impact. According to the Federal Emergency Management Agency's Floor Insurance Rate Map Number 06019C1590H, the project site is located in Zone X, outside of the 100-year flood zone. Additionally, no structural development will be undertaken as a part of the project, only demolition and site preparation activities. Therefore, the project would not place structures within a 100-year flood hazard, which could potentially impede or redirect flood flows.

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?

No impact. There are no levees near the project site that could result in flooding as a result of failure. According to the City of Clovis General Plan and the Fresno County General Plan Background Report, the project site is outside of any dam failure inundation areas. No structural development will be undertaken as a part of the project, only demolition and site preparation activities. Therefore, the project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of a levee or dam failure.

j) Inundation by seiche, tsunami, or mudflow?

No impact. The project site is located over 100 miles away from the Pacific Ocean and therefore would not be subject to tsunami hazards. There are no bodies of water near the project site capable of producing seiches. Areas surrounding the project site consist primarily of vegetated slopes and therefore would not be likely to produce mudflows. As such, site inundation by a seiche, tsunami, or mudflow is unlikely, and no impact would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
10. Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☐	☐	☐	☒

Environmental Setting

The project site is located in a built-up urban area within the City of Clovis. Residential and vacant land surround the project site.

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The project does not involve construction of any new structures that could potentially divide an established community. The demolition would be wholly contained within the existing project boundaries. The project itself does not propose any new roads or land division than what currently exists. Therefore, the project would not disrupt or divide an established community and no impacts would occur.

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?

Less than significant impact. The project would not require any change to the General Plan land use designation or zoning assigned by the City of Clovis. The project is being implemented in a manner consistent with the City of Clovis General Plan policies for the protection of natural and historical resources through the implementation of biological surveys and mitigation measures incorporated into the project. The project also includes preparation of air quality and greenhouse gas analysis and

a cultural resource investigation to ensure consistency with applicable land use plans and policies. Impacts would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

No impact. The project site is not within the boundaries of a habitat conservation plan or natural community conservation plan. This condition precludes the possibility of the proposed project conflicting with the provisions of such a plan. No impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Setting

The project is located in the City of Clovis, which is mapped as MRZ-3 by the California Geological Survey, which means the significance of mineral deposits cannot be determined from available data. The City of Clovis is within the Fresno Production Consumption (P C) Region, which spans much of central Fresno County and most of the west half of Madera County. According to Figure 5.11-1 of the General Plan Draft EIR, there are no significant mineral resources present within the project vicinity.

Environmental Evaluation

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

This impact analysis addresses both checklist questions 11a) and b).

No impact. There are no current mineral extraction activities on the project site. The project site is not located in a Mineral Resource Zone designated by the State, and the City of Clovis General Plan does not identify any locally significant mineral resources near the project site. Therefore, the development of the project would not result in the loss of a mineral resource of statewide or local significance. No impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
12. 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?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Environmental Setting

Characteristics of Noise

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB) with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds that we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. Noise is typically generated by transportation, specific land uses, and ongoing human activity.

The standard unit of measurement of the loudness of sound is the decibel (dB). The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments. While a change

of 5 dBA is considered to be the minimum readily perceptible change to the human ear in outdoor environments.

Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) was derived to relate noise to the sensitivity of humans, it gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for a number of various sound level metrics, including the day/night sound level (L_{dn}) and the Community Noise Equivalent Level (CNEL), both of which represent how humans are more sensitive to sound at night.[1] In addition, the equivalent continuous sound level (L_{eq}) is the average sound energy of time-varying noise over a sample period and the L_{max} is the maximum instantaneous noise level occurring over a sample period.

Noise Regulatory Framework

The project site is located within the City of Clovis. The City of Clovis has established noise policies for residential and non-residential land uses in the Environmental Safety Element of the Clovis General Plan 2035 (Clovis 2014). The following policies of the General Plan are specifically applicable to the proposed demolition activities associated with implementation of the project.

- **Policy 3.4 Acoustical study:** Require an acoustical study for proposed projects that have the potential to exceed acceptable noise thresholds or are exposed to existing or future noise levels in excess of the thresholds in the city's noise ordinance.
- **Policy 3.14 Control sound at the source:** Prioritize using noise mitigation measures to control sound at the source before buffers, soundwalls, and other perimeter measures.

The City of Clovis also provides noise performance standards in the Noise Ordinance of the Municipal Code (City of Clovis 2015). The following noise ordinances and standards are specifically applicable to the proposed demolition activities associated with implementation of the project.

- **5.27.604 Construction activities:** Unless otherwise expressly provided by permit, construction activities are only permitted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times be in strict compliance with the permit (§ 1, Ord. 14-02, eff. March 5, 2014).
- **9.22.080 Noise:**
  - The following acts are a violation of this section:
  - Construction activities shall be subject to the provisions of Section 5.27.604, which sets forth the permissible hours for construction activity. At all other times, no person shall operate, or cause to be operated, tools or equipment used in alteration, construction,

[1] L_{dn} is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m. CNEL is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 decibels to sound levels occurring in the evening from 7:00 p.m. to 10:00 p.m. and after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m. Source: Harris, Cyril M. 1998. Handbook of Acoustical Measurement and Noise Control.

demolition, drilling, or repair work so that the sound creates a noise disturbance across a residential property line, except for emergency work. Stationary equipment (e.g., generators) shall not be located adjacent to any existing residences unless enclosed in a noise attenuating structure, subject to the review and approval of the Director.

- **9.22.100 Vibrations:** Temporary construction exempt. Vibrations from temporary construction/demolition and vehicles that leave the subject parcel (e.g., trucks) are exempt from the provisions of this section (§ 2, Ord. 14-13, eff. October 8, 2014).

Sensitive Receptors

The closest sensitive noise receptors consist of a residence approximately 70 feet north of the Building 5.

Environmental Evaluation

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?

Less than significant impact with mitigation incorporated. Implementation of the project would result in potential noise impacts from operation of heavy construction equipment on the project site in the vicinity of off-site noise sensitive receptors.

Short-Term Construction Impacts

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase. Table 6 lists typical construction equipment noise levels, based on a distance of 50 feet between the equipment and a noise receptor.

Table 6: Typical Construction Equipment Maximum Noise Levels, L_{max}

Type of Equipment	Impact Device? (Yes/No)	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Pickup Truck	No	55
Pumps	No	77
Air Compressors	No	80
Backhoe	No	80
Front-End Loaders	No	80
Portable Generators	No	82
Dump Truck	No	84
Tractors	No	84
Auger Drill Rig	No	85
Concrete Mixer Truck	No	85
Cranes	No	85
Dozers	No	85
Excavators	No	85
Graders	No	85
Jackhammers	Yes	85
Man Lift	No	85
Paver	No	85
Pneumatic Tools	No	85
Rollers	No	85
Scrapers	No	85
Concrete/Industrial Saws	No	90
Impact Pile Driver	Yes	95
Vibratory Pile Driver	No	95
Source: FHWA, 2006. Highway Construction Noise Handbook, August.		

The demolition phase is expected to require the use of excavators, dozers, tractors, front-end loaders, backhoes, and concrete saws. The maximum noise levels for these types of equipment range from 80 dBA to 90 dBA L_{max} at a distance of 50 feet from the equipment operating at full power.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model was used to calculate construction noise levels at nearby sensitive receptors surrounding the project site during each phase of construction. The modeled receptor locations represent the closest residential units

to the west, south, east, and north of the project site. The modeled receptor locations are shown in Exhibit 1 of Appendix B. Construction equipment assumptions are based on the default construction equipment list from the air quality impact analysis for this project. A worst case scenario was modeled assuming each piece of modeled equipment would operate simultaneously at the nearest reasonable locations to each modeled receptor. Overall average daily project construction noise levels would be much lower than this worst case scenario as all equipment would not always operate simultaneously and would also be lower as the equipment operates toward the center of the project site further from off-site receptors. A summary of the modeling results are shown in Table 7. The construction noise modeling assumptions and outputs are provided in Appendix B of this report.

Table 7: Construction Noise Model Results Summary (dBA)

Receptor Location	Demolition Phase	
	L_{eq}	L_{max}
R-1: Closest residence to north of Building 5	83.3	84.5
R-2: Closest residence to north of Building 2 & 9	71.6	74.6
R-3: Closest residence to east of Building 5	64.9	66.4
R-4: Closest residence to south of Building 7	67.8	69.3
R-5: Closest residence to west of Building 9	74.1	76.3

Note:
L_{max} is the loudest value of any single piece of equipment as measured at the modeled receptor location.
Source: FirstCarbon Solutions, 2015.

As shown in the modeling results of Table 7, although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer term (daily) ambient noise levels would be small, but could result in annoyance or even sleep disturbance of nearby sensitive receptors if not restricted to daytime hours. However, according to the noise ordinances of the Municipal Code, unless otherwise expressly provided by permit, construction activities are only permitted between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday. Extended construction work hours must at all times be in strict compliance with the permit. At all other times, no person shall operate, or cause to be operated, tools or equipment used in alteration, construction, demolition, drilling, or repair work so that the sound creates a noise disturbance across a residential property line, except for emergency work. Stationary equipment (e.g., generators) shall not be located adjacent to any existing residences unless enclosed in a noise attenuating structure, subject to the review and approval of the Director.

Therefore, implementation of mitigation requiring compliance with best management practice construction noise reduction measures and restrictions on permissible hours of construction would ensure that construction noise would not result in a noise disturbance across any residential property line.

Mitigation Measures

MM NOI-1: Implementation of the following multi-part mitigation measure is required to reduce potential construction period noise impacts:

- Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between 9:00 a.m. and 5:00 p.m. on Saturday and Sunday. From June 1st through September 15th, permitted construction activity may commence after 6:00 a.m. Monday through Friday.
- The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.
- The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.
- The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- The construction contractor shall ensure that stationary noise-generating equipment shall be located at a minimum of 100 feet from all off-site sensitive receptors and placed so that emitted noise is directed away from adjacent residences.
- The construction contractor shall ensure that the construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the project site.
- The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. The construction contractor shall conspicuously post a telephone number for the disturbance coordinator at all entrances to the construction site.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes

of this analysis, project related impacts are expressed in terms of PPV. Typical vibration source levels from construction equipment are shown in Table 8.

Table 8: Vibration Levels of Construction Equipment

Construction Equipment	PPV at 25 Feet (inches/second)	RMS Velocity in Decibels (VdB) at 25 Feet
Water Trucks	0.001	57
Scraper	0.002	58
Bulldozer – small	0.003	58
Jackhammer	0.035	79
Concrete Mixer	0.046	81
Concrete Pump	0.046	81
Paver	0.046	81
Pickup Truck	0.046	81
Auger Drill Rig	0.051	82
Backhoe	0.051	82
Crane (Mobile)	0.051	82
Excavator	0.051	82
Grader	0.051	82
Loader	0.051	82
Loaded Trucks	0.076	86
Bulldozer - Large	0.089	87
Caisson drilling	0.089	87
Vibratory Roller (small)	0.101	88
Compactor	0.138	90
Clam shovel drop	0.202	94
Vibratory Roller (large)	0.210	94
Pile Driver (impact-typical)	0.644	104
Pile Driver (impact-upper range)	1.518	112
Source: Compilation of scientific and academic literature, generated by FTA and FHWA.		

Propagation of vibration through soil can be calculated using the vibration reference equation of:

*PPV = PPV ref * (25/D)^n (in/sec)*

Where:

PPV = reference measurement at 25 feet from vibration source
D = distance from equipment to property line
N = vibration attenuation rate through ground

According to Chapter 12 of the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment manual (2006), an "n" value of 1.5 is recommended to calculate vibration propagation through typical soil conditions.

The FTA has established industry accepted standards for vibration impact criteria and impact assessment. These guidelines are published in its Transit Noise and Vibration Impact Assessment document (FTA 2006). The FTA guidelines include thresholds for construction vibration impacts for various structural categories as shown in Table 9.

Table 9: Federal Transit Administration Construction Vibration Impact Criteria

Building Category	PPV (in/sec)	Approximate VdB
I. Reinforced – Concrete, Steel or Timber (no plaster)	0.5	102
II. Engineered Concrete and Masonry (no plaster)	0.3	98
III. Non Engineer Timber and Masonry Buildings	0.2	94
IV. Buildings Extremely Susceptible to Vibration Damage	0.12	90
Source: FTA, 2006.		

Out of the variety of equipment used during construction, the large dozers that are anticipated to be used would produce the greatest groundborne vibration levels. Impact equipment, such as clam shovel drops or pile drivers, is not expected to be used during implementation of this project. Large dozers produce groundborne vibration levels ranging up to 0.089 inches per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment.

The nearest off-site receptor is located approximately 70 feet from the nearest construction footprint where large vibratory rollers would potentially operate. At this distance groundborne vibration levels could range up to 0.019 PPV from operation of a large dozer. This is well below the industry standard vibration damage criteria of 0.12 PPV for even the most sensitive type of structures (see Table 4). Therefore, construction-related groundborne vibration impacts would be considered less than significant.

Upon completion of the proposed demolition activities, the project would not include any permanent sources of groundborne vibrations. As such, implementation of the proposed project would not expose persons within the project vicinity to excessive groundborne vibration levels. Therefore, project-related groundborne vibration impacts would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No impact. Upon completion of the proposed demolition activities, the project would not include any permanent noise sources or any related ongoing activities that would result in a permanent noise increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, implementation of the project would result in no impact regarding any permanent increase in ambient noise levels in the project vicinity compared to levels existing without the project.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant impact with mitigation incorporated. As addressed in Impact 12a), the operation of heavy construction equipment on the project site during project implementation could result in high intermittent noise levels at the closest noise sensitive land uses surrounding the project site. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer term (daily) ambient noise levels would be small, but could result in annoyance or even sleep disturbance of nearby sensitive receptors if not restricted to daytime hours. However, implementation of MM NOI-1 requiring compliance with best management practice construction noise reduction measures and restrictions on permissible hours of construction would ensure that construction noise would not result in a noise disturbance across any residential property line and would reduce impacts related to project-related temporary increases in ambient noise levels to less than significant.

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?

Less than significant impact. The project site is located approximately 1.2 miles northeast of the Fresno Yosemite International Airport (the nearest airport). While aircraft noise is occasionally audible on the project site, due to the distance from the airport and orientation of the approach paths, the project site does not lie within the 60 dBA CNEL noise contours of this or any airport. Therefore, the impact of noise levels from aviation sources would be less than significant.

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?

No impact. The project site does not lie within 5 miles of any private airstrip. While aircraft noise is occasionally audible on the project site from aircraft flyovers, aircraft noise associated with nearby private airstrip activity would not expose people residing or working in the project area to excessive noise levels. Therefore, no impacts associated with private airstrip noise would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. Population and Housing *Would the project:*				
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)?	☐	☐	☐	☒
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Setting

The City of Clovis is located in Fresno County, within the San Joaquin Valley of Central California. In January 2015, the City had an estimated population of 104,339 (California Department of Finance 2015). Homes in the vicinity of the project site are located in the City of Clovis or within the City's sphere of influence. These homes are designated as medium-density residential (4.1-7.0 dwelling units/acre) in an urban development setting (City of Clovis 2015).

Environmental Evaluation

Would the project:

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)?

No impact. The project includes demolition of the existing building occupying the project site. The project does not contain plans for extensions of roads or construction of employment facilities. Therefore, the project would not indirectly result in population growth to either the City of Clovis or Fresno County areas. Because the project would not induce substantial population growth either directly or indirectly, no impacts would occur.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

This impact addresses checklist questions 13b) and c).

No impact. The project site contains the remnant of a former winery and distillery, and the City of Clovis Recreation Center. There are no dwelling units on the project site. Therefore, the project would not result in the displacement of persons or housing. No impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. Public Services *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:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Environmental Setting

Fire Protection/Emergency Medical Service

The Clovis Fire Department provides primary fire protection and emergency medical services to the project site. Service to the project site is provided by City of Clovis, Station 4, approximately 1.78 miles northeast of the project site.

Police Services

The City of Clovis Police Department provides police services to the project site. The Clovis Police Department is located approximately 2.42 miles north/northeast of the project site.

Schools

The project site is within the Clovis Unified School District service area. The schools serving the area around the project site include:

- Miramonte Elementary School—approximately 0.60 mile northeast of the project site
- Reyburn Intermediate —approximately 3.09 miles northeast of the project site
- Clovis East High School—approximately 3.09 miles northeast of the project site
- New Heights Christian Academy—approximately 0.70 mile south of the project site
- Tarpey Elementary School—approximately 1.06 miles northwest of the project site
- CART (Center for Advanced Research and Technology) High School—approximately 1.06 miles north of the project site

Parks

The nearest parks are:

- Westcal II Park 0.23 mile southeast of the project site
- Melody Park—approximately 0.97 mile southeast of the project site
- Helm Ranch Park—approximately 0.76 mile northwest of the project site
- Basin 1E Park—approximately 0.70 mile northeast of the project site

Libraries

The closest libraries to the project site include:

- Clovis Library—approximately 2.40 miles north-northeast of the project site
- Cedar-Clinton Library—approximately 3.33 miles southwest of the project site
- Sunnyside Regional Library—approximately 3.73 miles south-southwest of the project site

Environmental Evaluation

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:

a) Fire protection?

Less than significant impact. No additional housing is proposed as a part of project activities. As such, no impacts to fire protection services related to population growth and the need for new or altered fire facilities would occur. The construction activities associated with project would be temporary and would not significantly increase the need for emergency fire services. The main access road from the project site, Clovis Avenue, would remain open during construction activities. In addition, the project would comply with all required measures of the Uniform Fire Code. Compliance with regulation would reduce potential fire impacts to a less than significant level.

Upon completion of the project, there would be less need for fire protection of the project site. Removal of the existing deteriorating buildings and weedy herbaceous vegetation that currently occupies the project site would decrease potential fire hazards in the area.

Demolition of buildings (during or after) would not result in substantial adverse impacts associated with fire services in the area; therefore, the impact would be less than significant.

b) Police protection?

Less than significant impact. No additional housing is proposed as a part of project activities. As such, no impacts to police protection services related to population growth and the need for new or

altered police facilities would occur. Construction activities associated with clearance of the project site would be temporary and is unlikely to increase needs for emergency police services. No part of the project would result in the closure of Clovis Avenue.

Implementation of the project would not increase the amount of police protection the project site currently requires. Clearance of the buildings currently occupying the project site would lessen the need for police protection. Eight of the nine buildings on the project site have been abandoned since the 1970s. These abandoned buildings have served as an attraction for criminal trespass. Many of the buildings were sealed to prevent human intrusion. Nonetheless, evidence of human intrusion is evident in the form of graffiti and refuse.

Upon completion of the project, the site would be more secure with the removal of the attractive nuisances of the deteriorated buildings and overgrown vegetation. Accordingly, additional police services would not be required. The impact would be less than significant.

c) Schools?

No impact. The project would not include any residential uses and, therefore, would not result in direct population growth. Job opportunities associated with the project would be temporary and are not anticipated to result in indirect population growth into either the City of Clovis or Fresno County areas from outside areas. Because the project would not cause direct or indirect population growth, no school enrollment growth would occur. Accordingly, no impacts would occur.

d) Parks?

No impact. The project would not include any residential uses and, therefore, would not result in direct population growth. As discussed previously, the project's temporary job opportunities are not anticipated to result in indirect population growth. One large building (Building 8) is currently being used as the City of Clovis Parks and Recreation Center. The project would not affect the operations of the Recreation Center.

Because the project would not cause direct or indirect population growth, and because it would not result in the closure of the City of Clovis Parks and Recreation Center, the project would not cause an increase in park usage; therefore, there would be no need for new or expanded park facilities. There would be no impact.

e) Other public facilities?

No impact. The project would not include any residential uses and, therefore, would not result in direct population growth. Additionally, the project's short-term job opportunities are not anticipated to result in indirect population growth from areas outside of Fresno County. Therefore, the project would not result in an increased demand or need for other public facilities, and no impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. Recreation				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Environmental Setting

The project site includes the Clovis Recreation Center. Other nearby recreational areas include:

- Westcal II Park—approximately 0.23 mile southeast of the project site
- Melody Park—approximately 0.97 mile southeast of the project site
- Helm Ranch Park—approximately 0.76 mile northwest of the project site
- Basin 1E Park—approximately 0.70 mile northeast of the project site

Environmental Evaluation

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?

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?

This impact analysis addresses both checklist questions 15a) and b) above.

No impact. The project involves the demolition of five of the existing nine buildings and does not include any residential development that would directly induce population growth. As discussed previously, the project's job opportunities would be temporary and are not anticipated to result in indirect population growth into the either the City of Clovis or Fresno County areas from outside areas. Therefore, the project would not result in the need for new or expanded recreational facilities or cause physical deterioration of existing recreational facilities from increased usage. No impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. 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?	☐	☒	☐	☐
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?	☐	☐	☐	☒
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
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?	☐	☒	☐	☐

Environmental Setting

Roadway Network

The following are summaries of key roadways in the project vicinity.

Clovis Avenue is a north-south roadway that begins in Clovis at Shepherd Avenue, and extends south across SR-99 to the community of Wildflower. Within Clovis, Clovis Avenue is a four- to six-lane arterial, with portions that are divided by a median. Within the City, speed limits on Clovis Avenue range from 35 miles per hour (mph) to 45 mph. Clovis Avenue is under the jurisdiction of the City of Fresno south of Ashlan Avenue. Adjacent to the project site, Clovis Avenue is an existing six-lane divided arterial with a posted speed limit of 50 mph.

Dakota Avenue is an east-west street that provides a connection to the project site via Clovis Avenue. Near the project site, Dakota Avenue is an existing two-lane undivided collector south of the project site.

Level of Service

The Transportation Research Board Highway Capacity Manual, 2010 (TRB 2010) defines level of service (LOS) as "A quantitative stratification of a performance measure or measures that represent quality of service, measured on an A-F scale, with LOS A representing the best operating conditions from the traveler's perspective and LOS F the worst." The City of Clovis strives to maintain an LOS D as the acceptable LOS, except where allowing lower LOS would result in public benefits.

Traffic Operations

The City of Clovis General Plan Draft EIR did not identify either Clovis Avenue or Dakota Avenue to operate at an unacceptable LOS in the existing and cumulative (2035) AM or PM peak-hour scenarios.

Existing Site Access

Primary site access is provided from Clovis Avenue through a driveway access along the Saginaw Avenue alignment. The driveway crosses the Fresno-Clovis Rail Trail.

Secondary site access is provided from Dakota Avenue to a driveway in front of the project site. Access via this secondary site does not cross the Fresno-Clovis RailTrail.

Transit

The project is located adjacent to the Fresno Area Express Route 45 Bus Stop along Clovis Avenue. The nearest City of Clovis Stageline Transit stop is located 0.20 mile north at Clovis and Ashlan.

Bikeways

The City of Clovis Class 1 Bicycle Path along the Fresno-Clovis Rail Trail is adjacent to the project site's western boundary. Vehicular traffic crosses the Class 1 Bicycle Path to access the project site.

Environmental Evaluation

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?

Less than significant impact with mitigation incorporated. The project involves the demolition of a former winery and cleanup of overgrown vegetation to provide a safer project site for potential future re-use. The demolition and cleanup is estimated to take 12 months. The project would generate traffic through the transport of workers and equipment to and from the project site and from the hauling of debris away from the project site. Such transport activities would be temporary;

however, increases in traffic levels, although temporary, could still potentially result in adverse effects to the regional and local circulation system. As such, the project's traffic impacts require evaluation. The analysis presents the project's impacts. Table 10 provides the projected traffic levels that are expected to be produced over the project construction schedule. Table 11 provides the average daily trips for the project. It should be noted that the project does not propose and new development; therefore, there would not be a long-term increase in traffic levels.

Table 10: Construction Trips

Activity	Construction Trips per Day		Haul Trips (Total) (Heavy-Duty Diesel Trucks)
	Worker (Passenger Vehicles)	Vendor (Medium Duty Vehicles)	
Demolition	20	2	3,043
Source: CalEEMod 2013.2.2 and First Carbon Solutions, 2015.			

Table 11: Construction Daily Trips

Activity	Construction Trips per Day
Average Daily Truck Trips (ADT) Converted to Passenger Car Equivalent	28
Construction Worker Average Daily Trips (ADT)	40
Total Average Daily Trips	68

Notes:
[1] Based on 255 construction work days
[2] The Average Daily Truck Trips were converted to passenger vehicle equivalent by multiplying by a factor of 2 pursuant to guidance in the Highway Capacity Manual, 2000.
[3] Vendor trips were added to the truck trips
[4] Construction worker trips were estimated based on a maximum of 20 employees, which total 20 inbound trips to the site and 20 outbound trips from the site.

For the purposes of this traffic analysis, it is assumed that inbound construction worker traffic would arrive at the project site from Clovis Avenue, and would enter and exit through Dakota Avenue to minimize potential pedestrian and bicycle conflicts. This direction is incorporated into the project through Mitigation Measure TRANS-1, which clearly states that Dakota Avenue shall be the access point for all construction traffic.

Mitigation Measures

MM TRANS-1 During project construction, the City's contractor will use standard cones and barricades to protect the public and the work areas. Access to the site by construction traffic shall be limited to Dakota Avenue. Flagging and other means of traffic control will be required to allow for the movement of traffic through the work zone. Cones, signing, and flagging for traffic control will conform to the requirements of the California Manual of Uniform Traffic Control Devices (MUTCD).

MM TRANS-2 The City shall require construction contracts to contain special provisions requiring that a traffic management plan be prepared. The traffic management plan shall be provided to the City for review and approval prior to issuance of demolition permits. The traffic management plan shall include strategies for minimizing impacts to traffic, effectively managing traffic flow and reducing the number of trips accessing the project site during the AM and PM peak hours. These strategies shall include but not be limited to:

- Require parking within designated areas on the project site and prohibit parking along the shoulders of adjacent roadways.
- Provide for emergency vehicle movement through the project area at all times during demolition.
- The construction contractors shall conduct early coordination with utility service providers, law enforcement, and emergency service providers to ensure minimal disruption to service during construction.
- Adjust work schedules so workers do not access the project site during the peak hours.
- Facilitate materials delivery during off-peak traffic hours and comply with regulations governing oversized loads.

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?

No impact. The passage of AB 2419 in 1996 allowed counties to "opt out" of the California Congestion Management Program. If a majority of local governments elected to exempt themselves from California's congestion management plans. On September 25, 1997, the Fresno Council of Governments Policy Board rescinded the Fresno County Congestion Management Program at the request of the local member agencies. Therefore, this impact criterion is not applicable, and no impact would occur.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No impact. The project is located outside the airport influence area of the Fresno Yosemite International Airport. The project would not result in features or actions that would affect air traffic patterns. No impact would occur.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than significant impact. The project does not propose to alter existing roadway designs within the project area; as such, the existing roadway system has been designed in accordance with City of Clovis, City of Fresno, and Fresno County roadway standards to avoid roadway hazards and other traffic-related hazardous features. Impacts would be considered less than significant.

e) Result in inadequate emergency access?

Less than significant impact. No facilities are proposed as part of the project that would change emergency access to the project site or that would affect access to nearby uses. Because no changes in emergency access or access to nearby uses would occur as a result of the project, there would be no impact associated with emergency vehicle access.

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?

Less than significant impact with mitigation incorporated. The project is located adjacent to the Fresno Area Express Bus Stop for Route 45 and to the City of Clovis Class 1 Bicycle Path along the Fresno-Clovis Rail Trail. The project does not include features that would affect existing bus ridership or bicycle routes. Mitigation Measure TRANS-1 requires the project to install signage and fencing to protect the public and work areas. This would serve to protect potential pedestrians and bicyclists accessing the bicycle route and bus stop. Additionally, because of the limited nature of the project, the performance of the transit facility and bicycle route will not be affected. Therefore, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, and less than significant impacts would occur.

Mitigation Measures

Implement Mitigation Measure TRANS-1.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. Utilities and Service Systems *Would the project:*				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

Environmental Setting

The project is located in an area that receives utilities and services such as water, wastewater, storm drainage, solid waste removal, electricity, and gas from a variety of providers.

The water and solid waste provider for the project site is the City of Clovis. Wastewater services are provided by the City of Fresno. Storm drainage is provided by the FMFCD. Pacific Gas and Electric (PG&E) provides both gas and electric service to the project site.

Environmental Evaluation

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than significant impact. The project would retain the existing City of Clovis Recreational Center but would not involve any changes that would increase potential wastewater generation that would exceed the wastewater treatment requirements of the Regional Water Quality Control Board. The project involves only temporary construction activities. During construction, a maximum of 18 workers may be on-site; however, wastewater would be contained within portable toilet facilities and disposed of at an approved site according to regulations. The construction contractor would enter into an agreement with a local service provider to dispose of the wastewater at an approved wastewater disposal location. A negligible amount of wastewater would be generated during construction, but it would not affect the ability of wastewater treatment facilities to meet their applicable wastewater treatment requirements; therefore, this impact would be less than significant.

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?

Less than significant impact. As a demolition project, the project would not require a permanent connection to water or wastewater facilities. The existing water and wastewater use by City of Clovis Recreational Center would not be affected; therefore, there would be no increase in demand for water or wastewater treatment that would require the expansion of existing facilities or the construction of new facilities. Water and wastewater facilities required during construction would be temporary and would consist of water trucked on-site or from well #18 on-site with existing entitlements as needed for construction and portable toilet facilities. Accordingly, the project would not require the construction of new water or wastewater treatment facilities. No impact would occur.

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?

Less than significant impact. The project currently contains all drainage on-site. The project would not generate additional stormwater runoff. The project would comply with NPDES requirements during construction to prepare a SWPPP to minimize erosion and runoff during demolition activities. The project would not require new stormwater drainage facilities or the expansion of facilities.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than significant impact. As discussed in impact 17b) above, the project would not require additional water supplies. During construction, all non-potable water required would be supplied through existing entitlements. Bottled water for employees would be brought to the project site as well. Water would be obtained from persons with existing entitlements to water, and no new

entitlements would be required. Upon project completion, no water source would be required for project operation. Therefore, the project would have sufficient water supplies available and no new or expanded entitlements would be needed. No impact would occur.

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?

Less than significant impact. The existing wastewater demand by the City of Clovis Recreational Center would not be affected by the project; therefore, there would be no need for additional service capacity. During construction activities, wastewater would be contained within portable toilet facilities and disposed of at an approved site according to regulations. The negligible amount of wastewater generated during construction would not be expected to exceed wastewater treatment capacity. No other sources of wastewater are anticipated during the project construction activities, and operation of the project would not result in the production of wastewater. As such, impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than significant impact. This impact assesses whether the proposed project would be served by a landfill with adequate capacity to meet the project's solid waste disposal needs. The existing project site is currently served with solid waste and recycling services provided by the City of Clovis.

Solid waste generated within the City is delivered to three landfills: City of Clovis Landfill, American Avenue Disposal Site, and Avenal Regional Landfill. The project would send its construction waste to two different landfills. Hazardous materials would be sent to Forward Landfill in Stockton and other debris would be sent to American Avenue Landfill. The City of Clovis has a Construction and Demolition Recycling Ordinance, which requires approximately 50 percent of materials to be diverted to recycling facilities. There are various recycling facilities within a 20-mile radius of the project site with which the City of Clovis would enter into an agreement to send its project material. The remaining debris would be send to the two landfills. It is estimated that approximately 147,360 cubic yards of material would be hauled away from the project site. Approximately, 73,680 cubic yards would be sent for recycling. Table 12 shows the remaining capacity at the landfills that are proposed to be used by the project. As shown below, the landfills have sufficient capacity to accommodate the project.

Table 12: Remaining Landfill Capacity

Landfill Name	Location	Remaining Capacity, cubic yards	Estimated Closing Date
Forward Landfill (San Joaquin County)	Stockton	54,000,000	2031
American Avenue Landfill	Kerman	29,358,535	2031
Sources: City of Clovis, 2014a; San Joaquin County, Draft EIR for the Forward Landfill Expansion, 2014.			

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than significant impact. Solid waste disposal must follow the requirements of the contracted waste hauler, which follows federal, state, and local statutes and regulations related to the collection of solid waste. The proposed project would comply with all state and local waste diversion requirements regarding trash and recycling areas. Less than significant impacts would occur.

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. 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?	☐	☒	☐	☐
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)?	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Environmental Evaluation

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?

Less than significant impact with mitigation incorporated. As evaluated in this IS/MND, the project would not substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory. Mitigation measures have been included herein to lessen the significance of potential impacts to special-status species and habitat through the incorporation of Mitigation Measures BIO-1 and BIO-2. Mitigation Measures CUL-1 through CUL-6 have also been included herein to lessen the significance of potential impacts to cultural resources. The City through its construction contractor(s) has agreed to implement all required mitigation measures; therefore, less than significant impacts from the project implementation would occur.

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)?

Less than significant impact with mitigation incorporated. As described in the impact analysis in Sections 2.1 through 2.17 of this IS/MND, any potentially significant impacts of the project would be reduced to a less than significant level following incorporation of the mitigation measures listed herein. Projects completed in the past have also implemented mitigation as necessary. Future projects would similarly be required to mitigation potential impacts. Accordingly, the project would not otherwise combine with impacts of related development to add considerably to any cumulative impacts in the region, and impacts would be considered less than significant.

c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than significant impact with mitigation incorporated. The project would not directly or indirectly cause substantial adverse effects on human beings. Air quality, greenhouse gasses, hazardous materials, and/or noise would have the only potential effects through which the project could have a substantial effect on human beings. However, all potential effects of the project related to air quality, greenhouse gases, noise, and hazardous materials are identified as less than significant or less than significant with the implementation of mitigation. The impact analysis included in this IS/MND indicates that for all other resource areas, the project would either have no impact, no significant impact, or—for impacts that would not affect human beings—less than significant impact with mitigation incorporated.

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